

**Issue Specific Hearing 5 Landscape and Visual Impact and Design on behalf of
Theberton and Eastbridge Parish Council, Stop Sizewell C and Minsmere
Levels Stakeholders Group
Oral Contribution by Cllr. Paul Collins**

Landscape and Visual Impact and Design Issues

Please note any text highlighted with bold and italic emphasis in the following submission represents additional information not conveyed in the oral submission.

2. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)

- **Impact of the Main Development Site on the AONB and the ability to continue to deliver its statutory purpose**
 - I would echo and agree with the points that Cllr Fellowes, Dr Bowes and Mr Collinson
 - The sheer size and extent of this development and including significant developments on its immediate border (Campus, recreational and administration buildings, two storey car park, borrow pits, entrance roundabout, entrance plaza) will sever the AONB physically, ecologically and environmentally in two for 10-12 years and have a residual and permanent impact due to the continued severance by the access road and car parks on Goose Hill.
 - ESC pointed out the restoration to a semi-natural landscape, interestingly with a couple of new hills on it, but in fact the degradation and time over which is required for the landscape to once again contribute positively and to recompense for the decade of impacts means that, as mitigation, it is of questionable value to biodiversity, a subject I'll come back to later in the week.

3. Landscape and Visual Impact Assessment (LVIA)

- **Adequacy of LVIA**
 - It seems that the applicant has covered this in the previous discussions. Once again much has been made of EN-6 and its assessment of Sizewell along with the applicability of need within those documents. We did cover this issues last week and the fact that the energy landscape and government assessment of need has changed compared to the time when those documents were created and published, so I won't go though that again.
 - However, since Fukushima the requirements for nuclear sites have changed significantly with footprint consequences for the Sizewell C and other sites, in that this 32 hectare site has had to adjust the footprint of Sizewell B and has made a very significant impact into the coastal frontage which has short and long term impacts on the AONB and any LVIA.
 - It will take many years for the landscaping that they intend to put over the hard coastal defence to actually re-establish itself and be more

than sand and shingle and grows back to something which is similar to perhaps what you see now on Bent Hills. But of course, the other point of that is that the applicant will take all of that dressing off at again at a later date to put another in another Hard Coastal Defence adaptation on top of it as sea level rises.

- None of this would have been apparent when EN-1 and EN-6 and the appraisals of sustainability for the Sizewell site were made. These documents are now being reviewed by the government with aspirations for completion by the end of this year. It's highly unlikely given the current situation that the same requirement for five nuclear power sites, which was in the original assessments, will be back again today. ***There seems to be differences of opinion between Committee for Climate Change, National Infrastructure Council and National Grid as to whether Hinkley Point will be enough, whether we need another large reactor project, or perhaps we'll end up with small modular reactors. Who knows? But the fact of the matter is, the requirement will change.***
 - In fact, the EN-6 document is already halfway through its review. The appraisal of sustainability parameters for the replacement for EN-6, have still got a site size of 30 hectares for a single reactor in it.
 - So, we come back to this "site size" point and the impact on the coast due to the advancing coastal defence which is a reflection of what happened at Fukushima and the impacts on nuclear power station safety design requirements and lack of space for a two reactor station at this location.
- **Provision of additional construction phase visualisations through the construction phase**
 - In terms of the business about additional visualisations, I would just echo everything that Councillor Fellowes, and the previous speakers have said. It's really difficult for interested parties and the public to understand exactly what this development will look like during its construction, and also when it's completed.
 - It is essential that visualisations are given at various stages of the development and on into the point when the project is completed and is operational.
 - There is another discussion about the use of rock armour on the northern mound a bit later, but the issue of what this will look like when it first gets put in, is going to be significant and it will take a significant amount of time for it to blend in as the landscaping grows back.
 - Whether you can blend in a 14 metre high at coastal defence, when the Sizewell B defence is only 10 metres, is doubtful, and it will be a significant distance forward of that defence.
 - There are issues with the permanent Beach Landing Facility with its piles going out into the sea and across the beach, which people will be expected to walk under or walk through.
 - So, I don't accept that what has been provided so far is good. And I think the applicant is perfectly capable of doing this. They did have an interactive graphical environment that they took around to a number of

the consultations where you could actually ask to look at the site from different aspects. And they could even look at it from my bedroom window, because they could pick a location and pick up how high you are and show what you're looking at.

- So the applicant has a lot of this background information available to share. The system wasn't perfect and it had some issues but it illustrates that what they could have showed in their DCO application was far more than these line diagrams which are anything but illustrative are almost impossible for lay people to understand.
- ***At Wylfa, CGI views of the site during construction were provided. The current line-based visualisations do not give any true reflection of a site that will have 40-50 tower and other large cranes in operation at the peak of construction. The applicant clearly has the ability to provide such visualisations and it is regrettable that this has not been evident in the DCO submission or in later revisions to the application.***

4. Role of a design champion, design review panel and design code

- **Position of Applicant and consideration of suggested benefits of roles/code to project**
 - I suppose that apart from the permanent development on site and the accommodation campus, all development in between in the construction site will be functional. The accommodation campus is the most obvious shop window during the development and will be difficult to blend into the local landscape.
 - On another point has the SLR and the various alternatives undergone any level of alternative design assessment alongside their LVIA
 - In terms of the main development the scale and size of imposition of this development on both the AONB, Designated sites, National Trust Coastguard Cottages (given their elevated position) are significant in the operational phase and no amount of design will be able to mitigate this impact especially given the unclad concrete finish for the two reactor domes.
 - The ability of a design champion to mitigate in any significant way the imposition of these blocky structures on the landscape will be minimal.
 - Longer term weathering of concrete tends to be unsympathetic and will only serve to increase the unacceptable impact of these structures.
 - Cladding to the other buildings whilst it may lessen the impact in comparison to the concrete domes will still be incongruous with respect to this location.
 - So, I'm not saying we shouldn't have a design review panel, but I see little positive impact being possible in terms of what this might contribute to the landscape impact assessment.
 - The applicant talked about the existence of the master plan for the campus. In my comments I wasn't talking about the lack or changes to the master plans, my point was about the cladding and the appearance of the campus buildings and we understood them to be the same as at the Hinkley Point campus site (unlike the Bridgewater campus). I don't know whether that's the case, but that was my query point. Perhaps the

applicant misunderstood what I was attempting to get at. It was confirmation of the cladding type for the campus site at the top of Eastbridge Lane.

5. Outage car park location and use of pylons

- **Strategic decision-making process and justification**

- I think we have consider what drove the necessity of putting this car park in the place that it is. The issue that we're faced with is the fact that this part of the development outside the main site and placed on Goose Hill, due to the fact that the applicant has decided to build two reactors on this site. It is a small site, it is very, very constrained, and therefore there is no room for any car parks.
- It goes back to, strategic decision making right at the beginning, that, whilst it might have been appropriate to consider a two reactor site in the past, following the increased safety requirements driven by Fukushima, the site isn't really a big enough site to fit all of the requirements onto it.
- I would also echo what Mr. Bedford has said regarding the fact that, you know, there are certain things you can't plan for, and one of them is to have both the Sizewell C reactors offline at the same time.
- The other is that you might just find yourself in a position where a planned reactor outage conflicts with other unplanned reactor outages, or a planned reactor outage gets extended, like the one at Sizewell B right at this moment, due to what they find when they open it up.
- So the idea that these two car parks can manage is not necessarily going to be the case. There may be the unlikely case, when there will be three outages at the same time for whatever reason, and that sort of planning needs to happen.
- It also occurs to me that as time goes on, if there was to be an offsite park and ride for the operational staff while an outage is going on, there is also a point at which size will be will no longer be operating and its car parks will probably become less well used because it's in decommissioning. That's the point at which the applicant can actually also stop using that offside car park.
- So there's a whole cascade of changes that are going to happen over time that should be considered.
- But the fact of the matter is, the basic problem with this site is that the applicant is trying to put too much into two small a space. And the AONB is the casualty of this approach and it shouldn't be the casualty.
- ***When EN-6 designated the Sizewell site as a potential site for a new nuclear power station it was with an expectation that site would take approximately 30 hectares for a single installation, an estimation based on the experience of Sizewell B.***
- ***The current site platform of 32 hectares has already required moving SZB facilities and a significant extension eastward towards the shoreline.***
- ***Original proposals for underground cabling from the turbine generators to the National Grid substation have now had to be***

changed as there is insufficient space for the underground galleries and to house the cabling.

- *These decisions have been forced upon the applicant because of trying to fit two reactor installations into space which is only sufficient for a single installation along with all of its ancillary installations and car parks which will not now fit within the main platform envelope.*
- **Alternatives and position of the Applicant**
 - *Whilst the location of the car park and permanent access road may well meet the requirement for nuclear sites to have two routes of entry, this permanent access route and position of the staff and outage car parks are within the AONB and at a position in between the two major designated sites. The result is that AONB gains an additional permanent severance at this position which will reduce the environmental and ecological contribution to the surrounding area and AONB as a whole.*
 - *An alternative could be to share staff and outage car park/laydown area and during an outage run a park and ride from a site outside of the AONB for operational staff. As SZB comes to end of life, the car parks at this site and possibly Sizewell A could become an alternative resource over time.*
- **Monitoring and mitigation measures**
 - No additional comments

6. Main development site design considerations

- **Additional design principles to be included within the Design and Access Statement**
 - No additional comments
- **Design and scale of turbine halls, operational service centre and skybridges**
 - No additional comments
- **Colour considerations and finishes**
 - No additional comments
- **Night-time lighting effects**
 - The comments by the applicant in their representations that the sites are different and therefore any visuals will not be totally comparable are true. One of the issues at SZC is that the construction site is not as compact as at Hinkley and is elongated in nature and will this provide a wider frame of light pollution than that at Hinkley Point.
 - Night-time glow at HPC at 1.5 miles distance from the site centre was measured at between +8-10 lux compared to viewing into the countryside in the opposite direction.
 - This level of additional reflected light into the village of Eastbridge will be sufficient to cause sleep disturbance throughout the night and I think you heard earlier from Cllr Fellowes the comments from Cllrs local to Hinkley Point C about night-time visibility issues.

- The area north of the construction site at Eastbridge has recently had an initial dark skies assessment of between 20.58 and 21.35 SQM (Unihedron Sky Quality Meter) and will be reassessed in the autumn around a new moon but the measurements so far indicate that the skies are at least Rural Sky, sufficient for complex Milky Way quality observation and the current skies may well reflect a Truly/Typical Dark site when measured later in the year.
- Faced with similar night-time glows as at HPC, these skies are likely to be significantly downgraded to rural/suburban transition at best.
- ***As supporting information, I have included the initial assessment for dark skies that will be updated later this year.***
- ***The point marked with SQM 20.89, bottom right, is about 150m from the closest borrow pit.***
- ***This point was also raised by the Mr Collinson of National Trust with respect to Coastguard Cottages where night sky events are held.***



- **Proposed design of Sizewell C power station and effect on 'iconic' status of Sizewell B power station.**
 - ***Unfortunately, there is nothing that can really mitigate the fact that Sizewell B with the iconic white tile dome and contrasting blue clad building will end up surrounded by the Sizewell A weathering concrete containment building and two new concrete domed reactor buildings and ancillary buildings potentially in a non-matching cladding material. The fact that the SZB building***

cladding material is already weathered means that any attempt to match or blend in the new site will fail and, in any case, the new site overall will fail to blend into the surrounding landscape.

- **Coastguard Cottages – adequacy of LVIA and proposed mitigation**
 - ***Without realistic visualisations of the site during construction and operation, a valid LVIA cannot be achieved and mitigation in any circumstances is not possible given the incongruous nature of such a large industrial installation surrounded by designated wildlife sites and its frontage sitting on the Heritage Coast.***
- **Design and location of beach landing facilities and additional suggested requirement**
 - I would I agree with what Mr. Bedford just said regarding the necessity of actually having these two facilities if you are to reduce road transport and get a more sustainable transport strategy.
 - My concern, in terms of landscape and visual impact, is much more to do with the permanent beach Landing Facility because not only does it have these fairly substantial piles going down the beach and into the into the water and the mooring piles for vessel. This is a structure which also has a roadway basically at five metres which is right at the edge of the sacrificial coastal defence which is going to be very prominent in the landscape.
 - In the current plan, it is going to be surrounded by soft coastal defence and it is a structure which is going to be there not only for the entire duration of the operation, it will probably be they're well into the decommissioning in order to remove materials or these same large indivisible structures as the decommissioning goes on.
 - So, I think that impact is quite extensive and over an extended period of time as far as the AONB and any sort of view of the site is from north south or offshore. There are many people that actually sail up and down the shore and this will impact the Heritage Coast from the sea too.
 - So overall, it is the permanent Beach Landing Facility that is of more concern than the temporary beach landing facility.
- **Location of accommodation campus, additional design commitments and requirement**
 - ***It has long been our position that the campus should have been split and we regard EDF's initial suggestion of other sites and their assessment as flawed. It has clearly been EDF's position that "the construction workers preference was to have the campus as close to the site as possible" despite the design at HPC being for a split campus which EDF say is being well used at both locations.***
 - ***One of the original locations suggested by EDF was also included in Suffolk County Councils review of potential sites but with an access route that avoided impact on the AONB.***

- *The applicant has removed the tallest 5 storey building proposals and the tallest buildings are now 4 storeys but considering that the whole site accommodates 2,400 workers when Eastbridge and Theberton resident population is only a few hundred and even Leiston is roughly 5,000, this size of campus is very significant in population alone and considering it borders the AONB along with its support buildings and two storey car park is a significant intrusion on this rural location and AONB.*
- Coastal defences – visibility of sheet piling, use of rock armour on the Northern Mound and effectiveness of landscaping.
 - *The fact that new information and changes to existing plans will be submitted at Deadline 5 and beyond will require further assessment of those changes and will make ISH 6 less meaningful as once again we are faced with a moving target for examination*
 - *This behaviour by the applicant on such a critical piece of infrastructure this late in the process is unacceptable and we would request that another ISH be scheduled to discuss these proposals once they are complete and will not be changed again.*
 - *AT that time a review of the LVIA should be undertaken but it is premature to suggest whether the existing LVIA will be unchanged or remain valid.*
- Location and height of borrow pits/spoil heaps and impact on neighbouring residential locations
 - *Spoil heaps up to 35m in height will be the tallest “structure” or landscape feature east of the A12. The spoil heaps are planned to be created on the 10-15m contour east of Upper Abbey farm and the proposed campus site. This means the top of these large 150,000m² spoil heaps will rise to between the 45-50m contour level of the surrounding area. A simple review of the local OS Explorer Map of the area (1:25000) reveals that until you are east of the A12 there are virtually no contours reaching 40m and 45m contours are almost entirely absent. The closest 45-50m contours are at Laxfield some 12-13 miles distant. These spoil heaps will rise well above the borrow pits to the north and will have an overbearing effect on all the properties, Eel’s Foot public house and garden and two campsites in the village. Potters farm, Theberton House, Keepers Cottages are all likely to have sight of these when they are at their maximum height and some of the properties to the West along Chapel Lane will also have sight of these.*
 - *The closest borrow pit to Eastbridge is approximately 250m from the village entrance, the combination of the perimeter bund and the proposed acoustic fencing will mean that this boundary will also impact the same properties to the north as referred to earlier regarding the spoil heaps and will have a significant impact until*

such time as the borrow pits are back filled, levelled and the perimeter fencing is removed. Whilst there is an indicative date for the back filling roughly halfway through the construction period, it is not clear whether the bund and acoustic fencing will be removed at the same time and whether there will be any additional perimeter fence outside the bund/acoustic fencing and at what time that would be moved back placing the closest borrow pit back under the landowners control with all fences removed or retreated.

The following italicised items were postponed for examination at a later point in time

- *Effectiveness of landscaping proposal in Pillbox field*
- *Monitoring and mitigation*

7. Sizewell Link Road

- *Design considerations, including night-time lighting effects*
- *Update on Pretty Road bridge design alterations and implications for LVIA*
- *Monitoring and additional mitigation suggestions*

8. Southern Park and Ride

- *Design considerations, including night-time lighting effects*
- *Monitoring and additional mitigation suggestions*

9. Two Village Bypass

- *Design considerations and location*
- *Monitoring and additional mitigation suggestions*

10. Mitigation and controls

- Draft DCO Requirement 14
 - No additional comments
- Draft DCO Requirement 22A
 - No additional comments
- Draft DCO Requirement 24
 - No additional comments
- Relevant schedules contained within proposed Deed of Obligation
 - No additional comments

11. Close of hearing