



The Sizewell C Project

9.106 Written Submissions Responding to Actions Arising from Issue Specific Hearing 13: Landscape, Visual Impact, Design and Terrestrial Heritage (16 September 2021)

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CONTENTS

CONTENTS	1
1 ISSUE SPECIFIC HEARING 13: LANDSCAPE, VISUAL IMPACT, DESIGN AND TERRESTRIAL HERITAGE	1
1.1 Introduction	1
Sizewell Link Road	1
1.2 Requirement 22A: Associated Developments – Highway Landscape Works 1	1
1.3 Requirement 20: Associated Development sites – Buildings, structures and landscape	1
1.4 Drainage ponds	1
1.5 Extent of Adoption	2
1.6 Landowner Discussions regarding enhanced landscaping proposals .	2
1.7 Speed Limit for the Sizewell Link Road	10
Southern Park and Ride	11
1.8 Associated Development Design Principles	11
1.9 Transport Incident Management Area	11
1.10 Response to Marlesford Parish Council	12
1.11 Requirement 24: Associated Development sites – Removal and reinstatement	12
Two Village Bypass	12
1.12 Two Village Bypass Landscape and Ecology Management Plan	12
1.13 Drainage Lagoon	12
Terrestrial Heritage	13
1.14 National Trust	13
Suffolk Coast and Heaths AONB	13
1.15 Construction Phase Visualisations	13
Monitoring and Control	13
1.16 Suffolk Design Review panel	13
1.17 Requirement 23: Landscape planting	14

1 ISSUE SPECIFIC HEARING 13: LANDSCAPE, VISUAL IMPACT, DESIGN AND TERRESTRIAL HERITAGE

1.1 Introduction

1.1.1 This document contains the Applicant's written submissions responding to actions arising from Issue Specific Hearing 13 (ISH13) held on 16 September 2021.

1.1.2 This document corresponds to the Applicant's **Written Summaries of Oral Submissions made at ISH13** (Doc Ref. 9.102) submitted at Deadline 8.

Sizewell Link Road

1.2 Requirement 22A: Associated Developments – Highway Landscape Works

1.2.1 Following ISH13, SZC Co. and SCC has agreed that requirement 22A will be updated at Deadline 10 to confirm that consultation with SCC must be undertaken before any detailed landscape scheme can be submitted pursuant to requirement 22A.

1.3 Requirement 20: Associated Development sites – Buildings, structures and landscape

1.3.1 The Associated Development Sites Design Principles include lighting design principles that must be complied with. Requirement 20 has been updated to clarify that the Statement of Compliance must demonstrate how the design principles have been complied with. Paragraph 2 has been amended to clarify that the works must be carried out in accordance with the details set out in the Statement of Compliance. This ensures that the lighting details are consistent with the design principles and ESC, in consultation with SCC, have appropriate control over these elements.

1.4 Drainage ponds

1.4.1 The drainage ponds will be designed so far as possible to maximise their biodiversity benefits, albeit whilst ensuring that their primary drainage function is not compromised. The LEMPS for the Sizewell link road and the Two village bypass both include a commitment to provide ponds specifically to provide biodiversity benefits whilst the Sizewell link road proposals also include additional ponds specifically designed for breeding great crested newts.

1.5 Extent of Adoption

- 1.5.1 A note will be provided at Deadline 9 setting out the process of confirming the extent of land to be adopted as highway.

1.6 Landowner Discussions regarding enhanced landscaping proposals

- 1.6.1 The following schedule (Table 1) records the landowners SZC Co. are liaising with in relation to enhanced mitigation and the status of matters at Deadline 8. The enhanced mitigation proposals (work in progress) for each landowner are to be issued at Deadline 8 to the landowners, with the offer of follow up meetings with landowners to support agreement in principle. A further update will be provided to the ExA at Deadline 10, with copies of the plans for the proposals included. Any proposals will need to be approved by ESC in due course, so they emerging designs cannot be committed to at this stage.
- 1.6.2 This note addresses landscape matters only and not noise attenuation or redirected field drainage etc.
- 1.6.3 The following sequence of activity is anticipated following in principal agreement of mitigation enhancement:
- Agree in principle, a scheme for additional landscape mitigation works with affected landowners as enhancement to the existing proposals and within the red line. Note the existing proposals have already been consulted upon with East Suffolk Council (ESC)/Suffolk County Council (SCC). Agree extent of off any off-site planting in landowner's control (this will be agreed under separate written agreement)
 - Agree landscape proposals with ESC and highway design with SCC
 - Agree extent of landscape/planting works within highway boundary/adoption extents (see separate note to be submitted at Deadline 9 on this process)
 - Develop detail sufficient for submission for Requirement 22A (landscape for highway schemes) – Requirement 22A is agreed. The discharge by ESC for landscape works both inside and outside highway boundary has now been agreed and this will require a revision to the wording of Requirement 22A.
 - SZC Co will be responsible for highway delivery, including design development for construction.

- Handover of the highway, including landscape works, within highway boundary will occur following the adoption of the schemes by the Highways Authority along with commuted sums for ongoing maintenance. Any planting outside adopted highway management to be by agreed mechanisms to be submitted to the ExA at Deadline 9.

Table 1.1: Sizewell link road

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
Mr and Mrs Grant Fordley Hall, Fordley Lane	Views of highway and traffic including headlights at proposed 'T' junction	Additional thickening of areas of planting within red line to be further explored to support screening and address concerns regarding visible vehicle lights at the 'T' junction. Consideration of locations where enhancement of existing boundary vegetation within Mr Grant's ownership may be beneficial.	Balancing pond area at 'T' junction to be configured to maximise planting opportunities and specify tall, feathered whips to accelerate screening. Provide additional planting extending north and south of 'T' junction.
Mr and Mrs Lacey Oakfield House, Fordley Road	Proximity and visibility of road to new home under construction and formation of new junction between Fordley Road and the Sizewell link road.	Explore additional planting within large areas of attenuation basin between house and road to support screening and possible realignment of junction to further support screening.	Additional planting proposed around reconfigured balancing ponds to support screening. Option for realignment of junction within limits of deviation being explored to further enhance screening and views directly down Fordley Road

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
			outside dwelling towards junction with Sizewell link road.
Mr and Mrs Boden Trust Farm, south of Title Road junction	Views across fields from farm property towards Sizewell link road including elevated sections; understand vertical alignment of road and effectiveness of planting in short and long term and visibility of traffic on the Sizewell link road.	Provide additional visualisations from agreed viewpoint/s to help understanding of performance of screening proposed – develop planting strategy in vicinity of balancing pond and within red line adjoining highway and consider benefits of off-site planting. Mr Boden to revert on the latter based on exploration of locations at site meeting.	Planting in balancing pond area near house to be coordinated with culverted watercourse and maximise screening close to existing hedgerow along access drive. Possibility of planting on land outside red line to be explored to support early screening including existing hedgerow within direct view of Mr and Mrs Boden senior's home.
Mr and Mrs Bacon Theberton Hall Farm	Use of additional land to be purchased by SZC Co. within former parkland of Theberton Hall at Sizewell link road intersection of Plumtreehills Covert	Joint discussion with Mr and Mrs Bacon/ESC conservation officer/SZC Co. (including landscape and heritage consultants) would be useful to explore what could be done with the land. Meeting to be progressed in due course.	SZC Co. advised that it was not necessary for the additional land to integrate the highway but could enhance the existing proposals.

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
Mr and Mrs Dowley Theberton House	View from first floor windows channelled between parkland trees to Glasshouse Plantation where trees are thinner/track enters fields on other side of woodland screen that would permit views of the proposed roundabout / roundabout lighting/ campus etc, Greenhouse plantation is deciduous and whilst wide will not totally screen views especially during winter; effects of possible tree and hedgerow loss along B1122 where Sizewell link road ties in - extent to be defined to understand scale of issue	SZC Co. to prepare proposals to explore enhanced screening at Greenhouse Plantation; prepare plan that illustrates extent of land and vegetation loss along Sizewell link road route to inform planting/mitigation strategy screening to Sizewell link road tie in, subject to extent of vegetation loss; and explore enhanced screening to B1122/site access roundabout including lighting control. Subsequent request by the Dowley's to remove a strip of their land from the Order limits, part of which is required for the tying-in of the Sizewell link road with the B1122 to ensure the land can maintain its landscape screening function for the dwelling from the adjacent highway. It is the	Opportunities to consider additional reinforcement planting (including evergreen planting) to strengthen young screen belt to west side of Glasshouse Plantation; possible additional parkland trees east of village lane in grassland area to interrupt view from first floor windows; additional planting north of B1122/site access roundabout along Eastbridge Road tie in (within red line and further option of additional planting outside red line to join with Glasshouse Plantation and use land that can't be used for arable production due to narrowness); exploration of lighting controls including use of shields to direct light down; prepare plan that illustrates extent of land and vegetation loss along Sizewell link road route to inform

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
		intention to confirm at Deadline 8 that the reduction in the red line is achievable as part of the Fifth Environmental Statement Addendum .	planting/mitigation strategy – awaiting tree survey information to develop proposals in detail.
Mr and Mrs Dowley Potters Farm	Oblique eastward views from farmyard garden towards main development site construction and views from driveway looking east.		Reinforcement of screening of the Eastbridge Road hedgerow where SZC Co. already own land and for early phase planting for supporting screening to construction zone C7. No other mitigation considered at this stage.
Mr and Mrs Dowley Eastbridge Farm and camping site	Screening of south eastern views across fields and hedgerows towards main development site construction from campsite and farmhouse.		Strengthening existing hedgerows on Eastbridge Road where there are gaps; explore understorey planting by the campsite to adjoin existing evergreen tree screen; explore advanced planting along borrow pit/ construction zone C7 field boundary.

Table 1.2: Two village bypass

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
Mr and Mrs Ayres Mollett's Farm	<p>Location of new road to rear of property altering views to including views of traffic etc; noise environment in most tranquil area of the farm which is currently used for holiday accommodation; and general amenity uses and impact on right of way / permissive footpath alignments and connections. First proposals not considered to substantially address concerns.</p> <p>Post first design comments:</p> <p>Extent of additional landscape mitigation shown on drawings that can be offered within the red line considered to be relatively limited.</p> <p>Rights of way/permissive right issues including ramp approach and connections punctuating a</p>	<p>SZC Co. to review additional landscape proposals based on discussions including rights of way, etc. And provide revised proposals, including sections to demonstrate how any proposed bunding would assist with reducing visibility of the proposed road and how the proposed road fits with the existing landform.</p>	<p>Revised landscape proposals prepared for discussion and following liaison with SCC as future adopting authority. Subsequent request for further cross sections to be provided and drawings prepared to support meeting. Meeting planned for 22 Sept.</p>

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
	<p>possibly continuous bund.</p> <p>Rights over adjacent landowners land being lost and how these would be retained.</p> <p>Connectivity options to be explored further to minimise impact on guest connection to nearby farm shop, woodlands, etc</p> <p>Maximising bund height and landscape mitigation.</p> <p>Query re remaining triangular fields between the farm and the two village bypass that do not fall within the DCO boundary but if taken into control could allow for a comprehensive response to screen the road.</p> <p>Concerned by constant reference to predominately 4.5m cutting which reduces as it parallels their land/open field boundary.</p>		

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
Farnham Environment Residents and Neighbours (FERN) Properties at or in the vicinity of Farnham Manor	Noise impacts during both construction and operation. Visibility of traffic using proposed road. Potential for overlooking by users of pedestrian overbridge. Details of planting proposed in terms of species, densities and heights at planting. Impacts on biodiversity – ‘island effect’ isolating populations, how bat hop-overs work, fencing types, etc	Revision of landscape proposals to address integration of the overbridge, potential for overlooking, screening for properties south of the overbridge. Provide further information on likely planting proposals. Provide further information on rights of way connectivity.	Proposals revised to slacken slope of ramps to overbridge to allow additional planting proposals. Bunding incorporated along road corridor south of the overbridge, as far as the existing hedgerow connecting to Ponds Wood. Proposal of close board fence along top of slope to overbridge to create a visual screen until planting becomes established. Follow-up meeting to present revised proposals delayed due to commitments of FERN members.

Table 1.3: Green rail route (outside main development site)

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
Mr and Mrs Mellen Aldhurst Farm Cottages	Concern re extent of visibility from properties of rail route and trains and the correlation	Request provision of cross sections to illustrate extent of performance of bunding and	

Interested Party/Property	Nature of issues	Actions	Nature of proposals emerging
	with noise modelling contours. Request for omission of area from temporary land take to permit tree planting by Mr and Mrs Mellen.	possible fencing to screen views and support noise attenuation.	
Mr Johnston Fishers Farm	Concern re extent of visibility from property of rail route and trains and the correlation with noise modelling contours.	Request provision of cross sections to illustrate extent of performance of bunding and possible fencing to screen views and support noise attenuation.	

1.7 Speed Limit for the Sizewell Link Road

1.7.1 The Sizewell link road was originally designed as a 50mph road, as described in the Stage 3 Pre-Application Consultation, para. 10.7.2 (Doc Ref. 5.1) [APP-075]. The geometric design of the road sought to follow the topography and avoid constraints while minimising the number of design departures and relaxations. Through consultation, Suffolk County Council (SCC) and Suffolk Constabulary raised concerns around the practical enforceability of the 50mph speed limit, expressing a preference for a 60mph speed limit to be adopted instead. The design speed for the Sizewell link road was therefore changed to 60mph. Increasing the Sizewell link road speed limit to the proposed 60mph only allows cars and LGV to travel at 60mph, as the National Speed Limit on single carriageway roads is 50mph for HGV and buses.

1.7.2 The horizontal and vertical geometry of the Sizewell link road designed for 60mph remained the same as for the 50mph design speed, and SCC accepted that there would be more design departures required to achieve the 60mph design speed. The design departures have been discussed with SCC and agreed in principle. The design and character of the Sizewell link road therefore has not fundamentally changed from the original 50mph design, and therefore reducing to 50mph would not alter the assessed impacts in terms of landscape, visual impact and historic environment.

- 1.7.3 For the reasons set out above, a lower design speed of 40mph would also not be supported and would also reduce the attractiveness of the Sizewell link road for road users. This would undermine the effectiveness of the Sizewell link road in providing traffic relief along the B1122; most particularly through the communities of Middleton Moor and Theberton.

Southern Park and Ride

1.8 Associated Development Design Principles

- 1.8.1 With particular reference to the southern park and ride site, ESC have indicated that they would like to see the Associated Development Design Principles updated to ensure lighting minimising lateral and vertical light spill and provides legacy planting. Site-Specific Design Principle 3 for the southern park and ride will be updated for Deadline 8 (Doc Ref 8.3(C)) to read:

The lighting design for the proposed development will use light fittings chosen to limit stray light; and, follow guidance within the latest Institution of Lighting Professionals Guidance Note (Ref. 1.3) as far as possible.

The design would minimise light spill both laterally and vertically onto adjacent habitats, and light spill both laterally and vertically beyond the site boundary would not exceed 1 lux.

- 1.8.2 The corresponding Site-Specific Design Principle for the other Associated Development sites will also be amended to reflect this update.
- 1.8.3 In relation to legacy planting, Site-Specific Design Principles 6 and 7 already cover the treatment of proposed planting following the removal and reinstatement stage.

1.9 Transport Incident Management Area

- 1.9.1 A Traffic Incident Management Area (TIMA) is proposed at the southern park and ride facility. The TIMA will be able to hold Sizewell C HGVs and buses in the event of an incident on the highway network. It is estimated that there would be sufficient hardstanding area to accommodate circa 90 HGVs and buses, discounting areas required for access, egress, and circulation.

1.9.2 As set out in the Traffic Incident Management Plan (TIMP) (Doc Ref 8.6(A)), the TIMA must only be utilised for holding Sizewell C HGVs and buses and only in the event that the **TIMP** (Doc Ref 8.6(A)) is activated.

1.9.3 No permanent lighting is proposed in the TIMA, as shown on the Southern Park and Ride Plans Not For Approval [\[AS-126\]](#). In the event of an incident that requires HGVs to use the TIMA in hours of darkness, temporary task lighting could be deployed to assist in the parking and management of HGVs as appropriate, with appropriate/suitable lighting measures for the temporary lighting when this area is in use. Any temporary task lighting in the TIMA would only be used to ensure a safe working environment.

1.10 Response to Marlesford Parish Council

1.10.1 In response to the request by Marlesford Parish Council for an off road cycle route from Marlesford to Wickham Market, this was discussed previously in a meeting with the Parish Council and SCC. It is not considered possible to deliver such a scheme within the extent of the public highway due to the existing width of the highway itself on the A12. The topography of the highway verge also limits the extent to which the verge could be incorporated into a cycle lane.

1.11 Requirement 24: Associated Development sites – Removal and reinstatement

1.11.1 Requirement 24 has been updated to reflect comments from ESC relating to securing the timing of the removal and reinstatement works. Requirement 24 has also been amended to reflect ensure that temporary highway works at Work numbers 10 and 13 would be removed. The Associated Development Design Principles will be updated at Deadline 9 to clarify that legacy landscape works would be retained where possible.

Two Village Bypass

1.12 Two Village Bypass Landscape and Ecology Management Plan

1.12.1 An update note will be provided at Deadline 9 once discussion has been possible with ESC to establish their requirements, with any changes incorporated in the version of the LEMP to be submitted at Deadline 10.

1.13 Drainage Lagoon

1.13.1 This matter is under discussion with Suffolk County Council in order to confirm the location of the lagoon and access track. The preliminary design (technical drawing) is to be updated and submitted to SCC to accord with

the DCO general arrangement drawing, with the steepened accommodation track in the latest location. The technical drawing is to clarify the maintenance access route from the TVB to the basin and interaction with the accommodation access route. Updated drainage calculations are being prepared to issue SCC with the final basin location to demonstrate the attenuation volumes, pipe gradients and levels will be sufficient.

Terrestrial Heritage

1.14 National Trust

- 1.14.1 SZC Co notes the National Trust Submission in lieu of attendance at Issue-Specific Hearing 13 (EV-142h), noting specifically the point of agreement that Coastguard Cottages are a non-designated heritage asset, and of disagreement over the magnitude of the adverse effect that would arise.
- 1.14.2 SZC Co welcomes National Trust's acceptance of the specific contribution providing for enhanced interpretation of the historical function and development of Coastguard Cottages as part of a wider package of mitigation secured by the Deed of Obligation.
- 1.14.3 SZC Co confirms that the technical note, which comprises a document signposting to relevant documents which set out SZC Co's view of the effect on Coastguard Cottages, was sent to National Trust on 16 September 2021.

Suffolk Coast and Heaths AONB

1.15 Construction Phase Visualisations

- 1.15.1 Illustrative construction visualisations both during the day and at night, along with an explanatory report setting out the approach taken and any limitations or assumptions made in preparing the visualisations, are provided as an appendix to the **Comments on Earlier Submissions and CAH1 and ISH8-10 Subsequent Written Submissions/Appendices** submitted by SZC Co. at Deadline 8.

Monitoring and Control

1.16 Suffolk Design Review panel

- 1.16.1 A link to the Suffolk Design Review Panel website is provided here: <https://www.ribasuffolk.com/suffolk-design-review-panel>.

1.16.2 Schedule 17 of the DoO (Doc Ref. 8.17(G)) has been updated for this deadline and this is now secured by paragraph 8. Before design details are submitted to East Suffolk Council for approval pursuant to Requirement 12 of the dDCO, SZC Co. must pay the Suffolk Design Review Panel £52,800 (index linked) (paid through ESC). This money is for the reasonable and proper costs of the Suffolk Design Review Panel for:

- its attendance at a site familiarisation visit at the SZC Development Site; and
- reviewing and providing written advice in respect of SZC Co's proposed design of the relevant Design Element (including attendance at a meeting to discuss such design),

1.16.3 As part of the details submitted to ESC for approval pursuant to Requirement 12, SZC Co. must submit a statement explaining how the advice from the Suffolk Design Review Panel has been taken into account in the final design.

1.17 Requirement 23: Landscape planting

1.17.1 Requirement 23 has been updated to include Work No. 14 (Yoxford Roundabout) to reflect SCC's request.