



# Together Against Sizewell C

SIZEWELL C PLANNING APPLICATION INQUIRY (IP no. 20026424)

## **DEADLINE 8: ORAL REPRESENTATIONS & COMMENTS REGARDING ISH13 LANDSCAPE, VISUAL IMPACT, DESIGN & TERRESTRIAL HERITAGE**

TASC are disappointed that Natural England were unable to attend this ISH as we feel this has led to a less robust scrutiny of the issues discussed. Although we appreciate that the ecological impacts of the SSSI crossing have been discussed, TASC would also like to express our concern that the landscape and visual impact of the SSSI crossing and access road have not been specifically considered at an ISH.

### **2. Sizewell Link Road**

- **Landscape and visual impacts of the link road. To include, but not limited to:**
  - **night-time lighting effects;**
  - **suitability of proposed landscaping scheme;**
- **Additional monitoring and mitigation suggestions.**

Chris Wilson's oral submission for TASC is included in the following:-

The link road will form a new permanent 6.8km, 60mph, carriageway running from A12 south of Yoxford to join the B1122. It will take 24 months to build. It will be outside the AONB [APP-459, ES (Vol.6) Chapter 6, fig.6.1] but will fall (almost exclusively) within the Ancient Estate Claylands Landscape Character Type (LCT) [APP-458, ES (Vol.6) Chapter 6, fig.6B.1]. A small area would be within the Special Landscape Area.

As referenced in [APP-457, ES (Vol.6) Chapter 6, para.6.6.55], the Applicant accepts the permanent effects would be of a "high magnitude and would result in moderate adverse effects".

That is coupled with the effects of lighting, which are assessed in [APP-457, ES (Vol.6) Chapter 6, para.6.6.57] to be of a "high magnitude and a moderate adverse effect"; however, the Applicant goes on to suggest that to be not significant "given the relative lack of existing artificial lighting within this LCT". TASC say that conclusion is perverse. As the Applicant explains:

"The Sizewell C development site lies within an area of intrinsically dark skies with the only other source of significant lighting in the immediate vicinity being that of the existing Sizewell A and B power stations." [APP-182, ES (Vol.2) Chapter 2, Appendix 2B, para.1.2.16]

And of the LCT generally:

“...this LCT is generally relatively dark with little existing light pollution ...”[APP-458, ES (Vol.6) Chapter 6, Appendix 6B, para.1.4.11]

The External Light Pollution Map shows this to be an area of very low levels of light. ” [APP-458, ES (Vol.6) Chapter 6, Appendix 6B, fig.6B.1].

The link road is said by Natural England in [REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.53] to be within the setting of the AONB.

As such, policy SCLP6.3 Suffolk Coastal Local Plan is engaged and breached, because it provides that development in the setting of the AONB, development should: “h) [m]inimise(s) light pollution from artificial light sources and ensure(s) the retention of dark skies”.

TASC wish to support Kelsale cum Carlton Parish Council’s concerns, particularly that the speed limit on the SLR is now proposed to be 60 mph and agree with their suggestion that a 40 mph speed limit would be more appropriate.

TASC also endorse the comments of Suffolk Coast and Heath’s AONB, that no amount of mitigation or compensation can adequately offset the impacts on the AONB.

### **3. Southern Park and Ride**

- **Landscape and visual impacts of the park and ride facility. -To include, but not limited to:**
  - **night-time lighting effects;**
  - **legacy planting and landscaping provision;**
  - **cumulative effects;**
- **Additional monitoring and mitigation suggestions.**

Chris Wilson’s oral submission for TASC is included in the following:-

This development comprises 26.4ha of predominantly agricultural land north-east of Wickham Market. It will take 12-18 months to build.

A small part of the development is within the Special Landscape Area, the majority lies within the Plateau Estate Farmlands. [APP-392 ES (Vol.3) Chapter 6, figs.6.1 and 6.3]. The loss of an open agricultural field to the development is acknowledged to be a moderate adverse effect.[APP-390 ES (Vol.3) Chapter 6, para.6.6.39].

The northern part of the site lies in a dark area, as shown on the External Light Pollution Map.58[APP-391, ES (Vol.3) Chapter 6, Appendix 6B, fig.6B.1]. That is acknowledged to give rise to moderate adverse effects “given the relative lack of existing artificial lighting in the vicinity of the northern part of the site”[APP-390 ES (Vol.3) Chapter 6, para.6.6.41].

That conflicts with policies SCLP6.4 and SCLP10.4 Suffolk Coastal Local Plan, which provides that anywhere across the plan area development should:

“Policy SCLP6.4 ...

f) Minimise[...] light pollution from artificial light sources and ensures the retention of dark skies;”

“Policy SCLP10.4 ...

“... protect and enhance the tranquillity and dark skies across the plan area.”

TASC agree with Marlesford Parish Council’s comments that if LED lighting is to be used then measures to help combat the adverse impacts on the insect population should be employed and that legacy planting/improvement of existing hedgerows is required.

#### **4. Two Village Bypass**

- **Landscape and visual impact of the link road. To include, but not limited to:**
  - **night-time lighting effects;**
  - **suitability of proposed landscaping scheme;**
  - **update by Applicant in respect of more detailed landscaping scheme;**
- **Additional monitoring and mitigation suggestions.**

Chris Wilson’s oral submission for TASC is included in the following:-

The bypass will comprise a new permanent, 2.4km, 60mph, single carriageway road which will depart from the A12 south-west of Stratford St Andrew before re-joining the A12 east of Farnham. It will take 24- months to build. It will fall outside the AONB but a large section would be within the Special Landscape Area. The road would run through the Rolling Estate Sandlands, Valley Meadowlands and Plateau Estate Farmlands LCTs.[APP-424, ES (Vol.5) Chapter 6, fig. 6.3].

The assessment is of a permanent:

- a. Moderate-adverse effect on the Rolling Estate Sandlands[APP-421, ES (Vol.5) Chapter 6, para.6.6.59].
- b. Moderate-adverse effect on the Valley Meadowlands [APP-421, ES (Vol.5) Chapter 6, para.6.6.63].
- c. Moderate-adverse effect on the Rolling Estate Claylands [APP-421, ES (Vol.5) Chapter 6, para.6.6.67].

There is again an acknowledged adverse effect arising on all three LCTs from lighting [APP-421, ES (Vol.5) Chapter 6, paras.6.6.61, 6.6.65 and 6.6.69]. This is within an area with very low levels of light, as shown on the External Light Pollution Map [APP-422, ES (Vol.5) Chapter 6, Appendix 6B, fig.6B.1].

Again, that conflicts with policies SCLP6.4 and SCLP10.4 Suffolk Coastal Local Plan, which provides that anywhere across the plan area development should:

“Policy SCLP6.4 ...

f) Minimise[...] light pollution from artificial light sources and ensures the retention of dark skies;”

“Policy SCLP10.4 ...

“... protect and enhance the tranquillity and dark skies across the plan area.”

The policies of the Suffolk Coastal Local Plan are consistent in this respect with paragraph 185(c) NPPF which enjoins decision makers to “limit the impact of light pollution from artificial light on ... intrinsically dark landscapes ...”. As such, the conflict should carry significant weight.

Mr Philpott, for the Applicant, made comments about those opposing the 2VB needing to assess this ‘mitigation’ as compared with the alternative of doing nothing. It would seem to TASC that Mr Philpott overlooks the fact that this so-called mitigation i.e. a bypass (1) is just moving the impact of huge amounts of traffic from one person’s doorstep to someone else’s and (2) cannot be deemed to be true mitigation as the Applicant is not intending for the 2VB to be in place before the SZC project commences so will only make a bad situation even worse in the early years as there will be the cumulative impact of the building of the 2VB at the same time as starting work on the main development site and other associated development sites.

## **5. Terrestrial Heritage**

### **• Heveningham Hall Estate Impacts**

**Impact on assets and any remaining areas of disagreement;**

**any additional monitoring and additional mitigation suggestions**

### **• National Trust Coastguard Cottage Impacts**

**Remaining areas of disagreement**

**Additional monitoring and mitigation suggestions**

The SZC project would introduce large prominent man-made structures into the AONB which would be dominant over Sizewell B and the surrounding countryside and heritage coast and will be particularly evident from Coastguard Cottages as can clearly be seen from the illustration in [APP-223: fig.13.10.66]. So TASC agree with the National Trust and ESC that there will be significant adverse impact.

## **6. Suffolk Coast and Heaths Area of Outstanding Natural Beauty Cumulative Impact**

### **• Adequacy of assessment**

**Has sufficient weight been given to all of the defined qualities of the AONB?**

Chris Wilson’s oral submission for TASC is included in the following:-

TASC do not consider that the Applicant has given adequate consideration to the defined qualities of the AONB. We know that the NPPF, the CRoW Act and EN1 [para 5.9.9] all say that substantial weight should be given to the purpose of conserving and enhancing AONBs. TASC's Written Representation [REP2-481f] and Deadline 5 submission [REP5-296] re ISH5 provide greater background to these matters as well as numerous areas where TASC consider that great weight should be given to protecting the defined qualities of the AONB. From the inception of the SZC project through to more recent changes, it seems clear to TASC that the Applicant pays little regard to protecting the AONB. The assessment of the potential SZC site within EN6 expressly excluded consideration of the access road impact and actually says, "...there is no presumption that development will take place in the area of the access road". Yet within the DCO application, the Applicant still has the access road effectively cutting the AONB in two, and its causeway resulting in loss of SSSI habitat, causing severance of habitats etc. The recent addition of the temporary jetty, the greater detail provided with regard to the sea defences and the proposed desalination plant, all would have significant adverse impacts on the AONB; it seems that to overcome many other problems with this project, such as the inability of rural roads to cope with the volume of traffic and the lack of potable water, the proposed solutions adversely impact the AONB to an even greater extent.

Mr Philpott, for the Applicant, responded to the above points by saying that TASC needed to consider striking a balance between taking traffic off the road and the additional adverse impact on the AONB from additional shipping and use of the BLFs. To this, TASC say that what the Applicant fails to accept or understand is that however they try to strike their balance, the total adverse impacts, both in the AONB and across all of East Suffolk, makes the whole SZC project totally unacceptable. The Applicant fails to grasp that, as so much so-called mitigation and compensation is required, it demonstrates their proposals for the SZC development far exceeds the capacity of such an isolated rural area to accommodate a project of this size. This is clearly evidenced by the need to build part of the platform on the SSSI and the loss of a large part of the Heritage Coast under the sea defences.

- **Assessment of other plans and projects**

**Will appropriate and proportional mitigation be secured within the project in respect of cumulative impacts?**

## **7. Monitoring and Controls**

- **Relevant schedules within the draft Deed of Obligation**

**Schedule 17 Governance – Suffolk Design Review Pane**