

FREEPOST SZC Consultation
EDF Energy Ltd

18 March 2019

Dear Sir/Madam,

Sizewell C Stage 3 Pre-Application Consultation

1. Introduction

I am writing on behalf of the Suffolk Preservation Society (SPS) in response to the Stage 3 pre-application consultation for the Sizewell C nuclear power station project. SPS is a non-political, independent, self-funding charity with charitable objects to *promote the conservation, protection and improvement of Suffolk's physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability possible*. We campaign on important issues which affect Suffolk's built heritage, its historic buildings, conservation areas and diverse landscapes. SPS acknowledges the contribution that projects such as Sizewell C could make towards securing the Nation's future energy needs and accepts that nuclear generation forms part of the Government's low carbon energy strategy.

Notwithstanding this position, SPS's charitable objects charge us with a responsibility to campaign to protect and promote the special landscape and heritage of Suffolk. We aim to achieve this by ensuring that the landscape and visual impacts of these proposals are fully identified, critically assessed and where possible properly mitigated.

In Summary

- SPS objects to the Sizewell C development as currently proposed due to the harm that this will cause to the Suffolk Coast and Heaths Area of Outstanding Beauty (AONB);
- SPS objects to the abandonment of the marine led strategy in favour of the rail and/or road options;
- SPS objects to the scale and location of the accommodation campus;
- SPS objects to the lack of information on the landscape and heritage impacts of the two villages bypass, the Yoxford junction alterations, the Sizewell link road and the Southern park and ride;

- SPS objects to the permanent development outside the main site at Goose Hill, the generic design of the plant, the inclusion of chimney stacks and additional pylons within the AONB and the lack of visualisations of these elements;
- SPS calls for an environmental fund in addition to the housing and tourism funds proposed
- SPS objects to the lack of analysis of the cumulative landscape and heritage impacts of Sizewell C with the Scottish Power Renewables EA1(N) and EA2 windfarms and National Grid infrastructure

2. Impact on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty

It is clear that despite responses to the previous stages of consultation, EDF continues to understate the importance of the Suffolk Coast and Heaths AONB designation. Para 3.6.6, Volume 1, of the consultation document states that *the fact that the Sizewell area is designated as an AONB and a Heritage Coast in local designations may well be important and relevant*. The Countryside and Rights of Way Act 2000 (CROW Act) clearly sets out the protection afforded to AONBs and the duty to conserve and enhance its natural beauty. The Natural Beauty and Special Qualities Indicators V1.8 21 Nov 2016 established, in agreement with the AONB Partnership and EDF Energy, that these indicators include: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage. The impact of the proposals on these indicators will be significant. Clarification is required on the impact of the proposals on the AONB through a formal assessment against these indicators.

3. Transport strategy options

SPS is disappointed that the sea based strategy has been discarded in favour of a road led approach alongside a rail led approach. There is no justification as to why the sea jetty approach has been rejected. The implications of the road led approach are considerable with a rise in HGV movements from 900 to 1500 per day plus two freight trains per day. Whereas the impacts on the road network by a rail led strategy are significantly less with an anticipated range of daily HGV movements from 450 to 900. SPS considers that the rejection of the marine led approach has not been robustly evidenced and any impediments to this approach must be weighed against the consequences of the road and rail approaches. The associated environmental impacts on the environment and communities are at stake and therefore in the absence of clear and convincing justification, we continue to call for the adoption of a marine led strategy.

4. Main development site

SPS continues to object to the generic design of the reactors and the absence of any design detail at this advanced stage. Chimneys have been included at Stage 3 which were not indicated at earlier

stages. Furthermore, no details about height or finish has been included. The use of a technology that requires chimney stacks together with associated plumes is totally unacceptable within the AONB and will result in an ever greater industrialisation of this landscape harming the special qualities of tranquillity and remoteness. We strongly object to the introduction of a pylon line of four towers, which are as high as the dome of Sizewell B, as they will introduce further visual blight into this sensitive landscape.

The physical constraints of the site are brought into sharp relief by the proposed permanent development outside of the main site on Goose Hill to provide the training centre and the outage car park. This further erosion of the AONB is wholly unacceptable. The proposed causeway to provide a new access to Sizewell C results in the greatest loss of the SSSI. Whilst we defer to others on the ecological impacts, the landscape and visual impacts of the monolithic raised structure in this fragile landscape is highly damaging. We strongly object to the scale and design of this structure.

If the site layout cannot be reduced to allow for these associated developments to be included within the site area and away from the SSSI, then the scale of the development should be questioned and reviewed.

In light of the above we consider that the site is too constrained for the proposed two reactors and the recent Government's response to its consultation 'On The Siting Criteria And Process For A New National Policy Statement For Nuclear Power With Single Reactor Capacity Over 1 Gigawatt Beyond 2025' (July 2018) is relevant. This response includes reference to Sizewell C and that EDF will need to '*provide information to demonstrate that the sites continue to meet the updated criteria*' (para 2.114) particularly as the report states at para 2.69 '*If a developer plans to bring forward a proposal for multiple units at a single site an area greater than 30 ha is likely to be needed*'.

Justification is required which demonstrates this compliance requirement and to state how this project can be progressed in an environmentally sympathetic manner, given the constraints that this site and its surrounding landscape imposes.

5. Accommodation campus at Eastbridge

SPS fundamentally disagrees with the selection of Eastbridge as an appropriate location for the workers campus. Notwithstanding the proposed reduction in footprint by limiting the campus to the east of Eastbridge Road, reduction in height from five to four storeys and the relocation of the sports facility to Leiston, we consider that the tranquil, deeply rural location adjoining the AONB is wholly inappropriate. Stage 3 of the consultation is based on a significant increase in modelling of the workforce from 4500 to a maximum of 7900, yet the campus provides for 2400 bed spaces and is clearly not capable of expansion. It is unclear what the justification is for this increase. SPS continues to assert that the Eastbridge site is unacceptable on the grounds that it is: sensitively sited on the edge, and within the setting, of the AONB, will dominate the nearby community of

Eastbridge, not large enough to accommodate the likely number of workers, and fails to provide much needed legacy housing in the county.

We continue to call for alternative, dispersed locations for the workers accommodation such as Ipswich, Lowestoft and Leiston which are better connected to the transport network, will provide better services and facilities for the workers as well as provide a housing legacy in areas of housing need.

6. Highways

SPS continues to call for a marine led approach which seeks to minimise the reliance upon road led solutions. With regard to the proposed highway changes, the technical aspects of road building falls outside our charitable objects and areas of expertise. We also defer to local communities who have detailed knowledge of current and future challenges faced by the local road network and acknowledge their concerns regarding congestion, pollution, noise and how these will be exacerbated by Sizewell C and other energy proposals. However we wish to make the following comments on the elements of the proposals which will have demonstrable negative impacts upon the heritage and landscape of the area.

6.1 Two villages bypass

While it is recognised that the bypass offers a benefit to communities and the setting of heritage assets within the villages of Farnham and Stratford St Andrew, the bypass has the potential to seriously impact on the setting of heritage assets, historic landscape character, field patterns and ancient woodland. The PEIR identifies 15 designated heritage assets within the study area of the bypass and states that only Glemham Hall (and Park), and Benhallstock Cottages as likely to experience negative impacts. SPS considers that insufficient information has been provided to justify this conclusion. A full settings assessment is therefore essential to inform the selected route of the bypass.

- Two roundabouts are proposed, one adjoining Glemham Hall, a grade I listed building and grade II registered park and garden, and the other to the south of Benhall Park, a non designated heritage asset. Although the bypass is not proposed to be lit, both roundabouts will be illuminated. The urbanising effect of these proposals has the potential to cause significant harm to the setting of these heritage assets.
- The area of search only includes the eastern part of the Glemham Hall parkland and we would consider that it is appropriate for this to be extended to include the Hall to ensure that all likely impacts are assessed. The siting of a construction compound adjoining Glemham Hall Park and garden may have impacts during the construction phase and should be fully assessed.
- Nos 54 and 55 Benhallstock Cottages are located adjacent to the northern roundabout and a construction compound. The location of the construction compound will have negative

impacts upon the setting of these heritage assets and detailed consideration of mitigation is required. Furthermore, the lighting of the roundabout will impact on the setting of these assets and will also require mitigation.

- The proposed bypass will run immediately to the south of Farnham Manor, a grade II listed building. It is unclear as to why the red line area extends west from the suggested route in close proximity to the designated asset. The impacts of the route on its setting must be fully considered in the EIA and mitigation provided.
- Hill Farm to the south of the proposed route is currently in a deeply rural setting which will be impacted by the bypass. This requires assessment.

In summary, no meaningful heritage assessment or landscape and visual impact assessment is available and therefore it is not possible to make further detailed comment at this stage. Furthermore no details of cuttings, embankments or junctions, or visualisations on the height of the proposed road, are provided and therefore a full assessment of the impact of the proposal on heritage and the historic landscape is not possible.

6.2 Yoxford junction improvements

The proposals will have a harmful impact on the character of Yoxford Conservation Area and the setting of many listed buildings as a result of the increased urbanisation of the village. The roundabout will be at a lower level than the existing junction and will be lit, signed and of a scale that it is alien to the historic character of the conservation area. The northern end of the village is within the designated conservation area and is characterised by a number of heritage assets including Satis House (grade II), White Lodge (grade II) and The Limes (grade II). The impacts of the proposals are likely to be significant and need thorough assessment.

We are aware that the Yoxford Conservation Appraisal has undergone a recent boundary review and an amended appraisal is currently out to public consultation. The proposed enlargement of the designated conservation area will include three parklands of Cockfield Hall, Rookery Hall and Grove Park; the first two adjoin or are in close proximity to the proposed roadworks. Accordingly, in the event that SCDC (East Suffolk) councillors approve the expansion of the Yoxford Conservation Area, careful consideration will need to be given to mitigating the impacts of the roundabout on the A12/ B1122 upon the historic environment.

6.3 Sizewell link road including bypass around Theberton (road led only)

Whilst we recognise that a bypass around Theberton village will provide benefits to the setting of a number of designated heritage assets, it is clear from the most preliminary examination that the route of the bypass has the potential to impact heavily upon the historic environment. SPS is concerned that the route has been identified without adequate assessment of the landscape and heritage impacts and insufficient information has been provided to justify the chosen route.

- The impacts on the character of the historic landscape and the setting of the 45 heritage assets within the agreed 750m search area have not been fully assessed.

- Leiston Abbey, a scheduled monument, has been omitted from, but is immediately adjacent to, the search area. The impact of the route on this asset needs to be considered;
- SPS has particular concerns around Theberton Hall (grade II). The footpaths potentially indicate the historic boundaries of its parkland. The route does not respond to these landscape features and renders the Hall surrounded on four sides by highways which will have an impact upon its setting.
- SPS is also concerned by the potential impact on Theberton House (grade II*), including the gate piers and gates at the junction of Leiston Road and Onner's Lane (grade II), which are included within the redline area.
- SPS would question why Para 5.5.42 identifies Moat Farm (grade II) as close to the bypass. Moat Farm it is one of the designated assets furthest away from the bypass we do not understand why this assessment has been made. There are numerous other assets which are far closer and more likely to suffer impacts which have not been identified. This leads us to question the criteria that have been used to identify the assets which are identified for assessment.
- The PEIR states that the *contextual evidence would suggest that there is the potential for prehistoric activity, both in terms of settlement as well as funerary activity, within the area. The topographic location on the southern edge of the river valley would also provide a favourable location for such activity.* In the absence of geophysical or trail trenching comment on the archaeological implications is not possible. This is required pre submission of the DCO in order to inform the proposals and allow for appropriate mitigation.

6.4 Southern park and ride (Wickham Market)

SPS is disappointed that a more dispersed parking scheme along the A12 corridor has not been pursued since the Stage 2 consultation in place of the proposed 2 large park and ride areas. Moreover the number of vehicles to be accommodated at each has risen significantly from 900 to 1250. The Southern park and ride at Wickham Market is of particular concern due to the significant landscape impacts which will result (table 9.2.2) on the special landscape between the Rivers Ore and Deben. We object to the scale of the park and ride, the extended hours of operational activity and the resultant light pollution. Yet again an assessment of the impacts on the setting of designated heritage assets has not yet been carried out.

- Wickham Market and Marlesford conservation areas are omitted from the list of designated heritage assets to be assessed (table 9.5.3). The impact on the character of these areas must be assessed in order to identify impacts and adequate long-term mitigation that is not solely reliant upon bunding;
- SPS considers that both options to accommodate traffic approaching the park and ride from the west are impractical and require further consideration;

- Option 1, which requires the removal of around 40 residential on street parking spaces, will result in a large increase of traffic through the Wickham Market Conservation Area;
- Option 2 which diverts traffic to the north of Wickham Market will have a damaging impact on the tranquil, rural landscape. It will have a detrimental impact on the grade II listed Glevering Bridge which is single carriageway; and the road changes and intensification of use of the road network will harm the scenic beauty of the Deben Valley Special Landscape Area and the amenity of users of the PROW network which includes bridleways;
- Glevering bridge, Grade II* Glevering Hall and stables, orangery and lodge (grade II) are not included in the study area but will be impacted by the alterations to “Easton Road” road improvements and require assessment.

6.5 Northern park and ride (Darsham)

SPS supports the location of the park and ride as it is a sustainable location beside the A12 and will encourage workers to use the rail network to access the park and ride transport. However, impacts from the roundabout and park and ride facility on the setting of Oak Hall, a grade II listed building, immediately to the north of the development site must be fully assessed and mitigated.

7. Need for environmental fund

The Suffolk Coast and Heaths AONB is one of the most important areas of Suffolk, from a landscape and natural beauty perspective but also plays a vital economic role supporting over 4,600 jobs. The jointly agreed Natural Beauty and Special Qualities document notes states that *‘The landscape is an important contributor to the local economy. The coast in particular is a major tourist destination.’* SPS agrees with the AONB Partnership that the local population and the local economy will be significantly impacted by the current proposed development and will have unacceptable ongoing impacts on the tourism sector and other local businesses.

It is understood that the Government has recognised the ‘burden’ that local communities hosting nuclear power stations carry by announcing an annual community benefit scheme. SPS expect EDF to work jointly with the Local Authorities and central Government to ensure this is delivered alongside the package of compensation secured through the DCO process. We note that the Stage 3 proposals include an indication from EDF that they will be providing a Housing Fund, Tourism Fund and Community Fund. These must be of an adequate scale to truly offset the negative impacts on the local communities. However it is noted that funding is not being specifically made available to the AONB Partnership to offset the impacts that can be identified through the application of the ‘Natural Beauty and Special Qualities’ indicators. SPS would urge that EDF address this shortcoming prior to the DCO application.

8. Conclusion

Whilst this project is a Nationally Significant Infrastructure Project where decisions will be made on a national basis, it is important to stress that the significant physical impacts will be experienced locally within a highly sensitive landscape. SPS is concerned by the unprecedented number and scale of energy related projects that the coastal belt of Suffolk will be hosting in the near future. Apart from their individual detrimental impacts on the nature and character of the region the ad hoc approach to their provision is compounding this irreversible resulting damage.

SPS supports the call from the Local Authorities and other groups for a more coordinated delivery of energy NSIPs in East Suffolk. We call for changes that can more effectively manage the associated infrastructure in a way that minimises the harm to our natural and built heritage, our landscapes and the communities who live within them. The current unplanned approach which fails to consider the long term environmental damage and the cumulative effects is unsustainable and we are strongly opposed to schemes which do not give proper weight to identifying the injurious consequences and fail to adequately mitigate or, where necessary, compensate for them.

Yours Faithfully



Andrew Fane OBE MA FCA
Chairman

Ccs:

President Suffolk Preservation Society, Geoffrey Probert

MPs: Therese Coffey, Dan Poulter, Peter Aldous, Sandy Martin

Suffolk County Councillors: Richard Smith, Andrew Reid, James Finch, Russ Rainger, Graham Newman, Steve Wiles, Stuart Bird, Keith Patience, Steve Ardley, Michael Ladd, Jamie Starling, Jenny Ceresa, Craig Rivett, Melanie Vigo di Gallodoro, Caroline Page, Alexander Nicoll, James Reeder, Keith Robinson

Phil Watson – Suffolk County Council Landscape Officer

Robert Scrimgeour, Principle Conservation Officer, Suffolk Coastal District Council

Eloise Limmer, Conservation Officer, Suffolk Coastal District Council

Suffolk Coastal District Councillors: Tony Cooper, Ian Pratt, Terry-Jill Haworth-Culf, Maureen Jones, Carol Poulter, Phillip Dunnett, John Fisher, Mark Amoss, Geoff Holdcroft, Patricia Mulcahy, Andy Smith,

Tony Fryatt, Portfolio Holder for Planning, SCDC

Parish Councils: Theberton and Eastbridge, Yoxford, Marlesford, Little Glemham, Farnham with Stratford St Andrew, Leiston cum Sizewell, Wickham Market, Darsham, Blythburgh, Saxmundham, Middleton cum Fordley, Hacheston

Will Fletcher, Inspector Historic England

Simon Amstutz, AONB Partnership

National Trust East of England Regional Office

Chief Executive CPRE, Crispin Truman

Suffolk Wildlife Trust, RSPB

TEAGs, Roy Dowding, B1122 Action Group, Minsmere Levels Stakeholders Group: John Rea Price, Paul Collins