

08 December 2020

[info@sizewellc.co.uk](mailto:info@sizewellc.co.uk)

FREEPOST SZC Consultation  
EDF Energy Ltd

Dear Sirs,

### **Sizewell C proposed New Nuclear Development. Stage 5 post DCO submission Consultation**

I am writing on behalf of the Suffolk Preservation Society in response to EDF Energy's Stage 5 Consultation on Sizewell C. The Society is disappointed that having prepared and submitted our Statement to Register as an Interested Party to the DCO, within weeks we are asked to comment on a further raft of changes and possible changes to the scheme. For small community groups with limited capacity it is unreasonable that EDF, after 10 years preparing this scheme, is still making significant adjustments after the DCO application has been submitted. Many of the issues to which this consultation relates, including coastal defences and traffic, are matters that have been raised by the community over many years and it is deeply frustrating that they have not been responded to until this very late stage. Having reviewed the submitted alterations to the scheme the SPS wishes to make the following response:

#### **Evolving nature of the proposals**

In many respects the nature of some of the proposals is predicated on feasibility studies, modelling assessment and changes resulting from ongoing detailed design work. This places enormous additional demands on stakeholders to constantly play catch up with this evolving process. Furthermore, the public are being asked to comment on a scheme that continues to be far from finalized and is still evolving and without any degree of certainty. This is wholly unsatisfactory as it continues to place unreasonable demands upon stakeholders and is also of limited value as they may yet change further. Therefore, this stage 5 consultation risks taking up further time and effort of small parishes and their residents which in turn may risk engagement fatigue on this most important scheme.

#### **Freight Strategy**

The SPS welcomes the efforts which are finally being made to address the significant highway and environmental impacts by increasing sea and rail movements and reducing the number of

anticipated HGV movements across Suffolk's inadequate highway system. However, it is the communities most likely to be impacted by these changes whose views must be given precedence. We also welcome the amendments to the landscape mitigation at the southern park and ride and reduction in land take at the Yoxford roundabout.

The proposed enhancement of the Permanent Beach Landing Facility and options for a temporary Beach Landing Facility are in principle welcomed as a positive approach to address the concerns of the communities and other stakeholders who have sought to minimise HGV movements. However, the proposed changes will see additional negative impacts on the scenic qualities and tranquility of the AONB in the proposed development area as a result of larger structures and increased levels of activity. Sufficient information has not been provided to assess the magnitude of these impacts. The range of scenarios and inadequate level of detailed information heavily impacts upon the effectiveness of this consultation exercise. There has not been an adequate assessment of the impact of additional structures on views further along the coast and without further assessment the SPS is concerned that in a bid to reduce traffic impacts on the highway network the appropriate level of weight to the designated landscape has not been given. In order to minimise the impacts a more detailed assessment of landscape and visual impacts together with embedded mitigation is required.

### **Landscape and Visual Impacts**

The proposals include a significant increase in land take involving hedgerow and tree loss as a result of the recent more detailed design work. We note the assertion that on balance these amendments do not affect the conclusion of the Environmental Statement. Yet we remain concerned that in the case of the Sizewell Link Road there appear to be a total of 50 additional parcels of land that are to be included within the Order while only one area which is to be excluded. The landscape impacts by stealth will continue to erode the landscape value of surrounding villages and we question whether on balance this continued land take should not be comprehensively re-assessed. In summary the modifications to the land take for the link road and two village bypasses in no way responds to the previously stated concerns that the Society has set out in its response to the Stage 3 consultation regarding the associated environmental impacts on the Sizewell link road and the Two Village bypass. SPS continues to be concerned that the routes have been identified without adequate assessment of the impacts on the surrounding landscape and the settings of numerous heritage assets and that insufficient information has been provided to justify the chosen routes.

### **Relocation of facilities at Sizewell B**

The SPS has responded to the planning application (Ref 20/04646) for proposed works to relocate facilities at Sizewell B to accommodate Sizewell C in association with the destruction of

Coronation Wood under separate cover. For the sake of completeness, we reiterate our comments here. SPS acknowledges the recent unsuccessful judicial review of the council's decision to approve the previous application ref: 19/1637/FUL. While we regret the loss of Coronation Wood, we welcome the amendment to EDF's proposals which no longer propose to locate an outage car park on Pill Box Field, but rather to retain it as an undeveloped site and provide additional landscaping to enhance its landscape and biodiversity value. Accordingly, SPS will restrict its comments to the landscape and visual impacts of the current application to develop the former Coronation Wood upon the special qualities of the Suffolk Coast and Heaths AONB.

Having reviewed the documents, the Society is concerned that the loss of Coronation Wood to accommodate the relocated facilities has not been adequately mitigated. Figure 3.2 and 3.4 Development Area Landscape Plan within chapter 3 of the Environmental Statement shows a combination of retained deciduous woodland and hedgerow, proposed woodland edge planting and grass mix on the western boundary, adjoining the Sizewell Marshes SSSI.

The SPS considers that this will be inadequate to screen, soften or provide filtered views of the proposed development. The topography of the site is relevant in this regard as the lowest part of the escarpment to the west of the proposed development area is 5m while the height of Coronation Wood is shown as 10m. The datum levels across the development area varies averages between 7-8 metres. Therefore, it is reasonable to conclude that there will be glimpsed views of the car park as well as the Administrative Building (20m in height) and Training Facility (10m in height) by receptors to the west from Sandy Lane bridleway. Significant landscape scale planting in the form of blocks of additional woodland must therefore be provided,

Furthermore, the extensive illumination of the car park, including reflection off metallic surfaces of the facing materials of the Administrative Building and Training Facility, together with substantial hard landscaped areas of car parking will cumulatively result in a harmful impact upon the special qualities of the AONB. The loss of the evergreen Coronation Wood and replacement by modest levels of deciduous and largely small-scale planting will not adequately mitigate the landscape and visual impacts of the proposed large structures. The SPS considers that this is a serious omission and calls for materially increased levels of planting within the car park and at the boundaries of the western access road in order to soften the industrialising effects in this designated landscape.

Finally, we note that the applicant argues that the proposed landscape planting at Pill Box Field will mitigate for the loss of Coronation Wood (LVIA chapter, para. 7.6.33). However, this is considered to be illogical and the SPS does not accept that the proposed planting to the south of the Sizewell Power Plant can mitigate the loss of screening from the west for the reasons set out above. In conclusion, the SPS calls for a significant increase in planting to both the western edge of the car park, together with planting within the car park to provide filter the views, which will provide enhanced screening as well as biodiversity net gain.

## **Pakenham Fen**

In particular we note the proposed creation of offset mitigation at Pakenham, over 50 miles from Sizewell. We are concerned by these proposals, not only because they do not justify the loss of designated habitat at Sizewell but also that the proposals raise serious issues for the natural and historic environment at Pakenham.

Pakenham is unique in Suffolk in that it enjoys both a wind and watermill. The Pakenham Water Mill is an important surviving mill, listed as of national architectural and historic importance, and is a much-loved Suffolk visitor attraction run by a strong and enthusiastic team of volunteers. The proposed creation of a fen meadow raises multiple concerns, firstly: that changes to the hydrology on the other side of the Mill Stream may have an adverse effect on the existing SSSI meadow. Secondly, it appears that the boundary of the new fenland follows the route of Pakenham stream. This poses questions about any impact this may have upon the flow of the stream and in turn the watermill and how EDF will ensure that there are no negative consequences for the SSSI and watermill at Pakenham. Until full information is provided, this is an aspect of the proposals that the SPS is very concerned by and discussion must be entered into with the parish council as well as the Suffolk Building Preservation Trust who own the watermill.

In conclusion, the latest set of amendments/proposals do not materially address many of the objections raised by the SPS and in some instances raise new issues that we have serious concerns about, accordingly we continue to object.

Yours Faithfully,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC  
Director**

Ccs:

MPs: Therese Coffey,

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 Gallidoro, Caroline Page, Alexander Nicoll, James Reeder, Keith Robinson

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

Beverley McClean, AONB Partnership

STOPSZC

Clerk, Pakenham Parish Council

Piers Hart, Chair Suffolk Building Preservation Trust