

Wickham Market

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Our ref: Sizewell SZC DCO RR

Date: June 2nd 2021

SIZEWELL C APPLICATION FOR DCO Written Representation June 2021

I **strongly object** to the proposal to build SZC. The location on the sensitive Suffolk coast and within our nationally designated coastal 'Area of Outstanding Natural Beauty' (AONB) is unacceptable for many reasons. One of the statutory purposes of the designation of a landscape as an AONB is that it should be both conserved and enhanced.

The NPPF states that:

Areas of Outstanding Natural Beauty, and Heritage Coast which have the highest status of protection in relation to the conservation and enhancement of the natural environment.

The NPPF at Para 172 states that:

The scale and extent of development within the designated AONB area should be limited and planning permission should be refused for major development other than in exceptional circumstances, and of course it is these which are under now under consideration. Significant adverse and detrimental impacts have not been sufficiently 'moderated'.

1. Overarching

The development and all aspects of the construction and its subsequent operation will result in a legacy of carbon emissions and radioactive waste which will plague and pollute both Suffolk and the UK for many centuries into the future.

The **construction impacts** for the proposed 12 year period will be over a 'long term' period (GLVIA 2013). Likely delays (evidence from France, Finland and the UK) will extend this into an even longer term period with resulting damaging consequences.

This development, ancillary works/laydown/accommodation/access arrangements and works areas will result in significant detrimental physical landscape and visual impacts across the coastal area.

I have concern that **new jobs and apprenticeships** for local people will be limited in both scope and longevity. It is clear to see that the construction of both SZA and SZB

did not have lasting economic benefits for Leiston and the surrounding areas. Any jobs which support the production of a toxic waste legacy should be feared and not welcomed.

If DCO is consented:

- Guarantees must be given that the local population will benefit from new jobs and apprenticeships being created.
- Specific measures to support plant nursery (local provenance propagation will be needed), landscape and environmental management trades must be put in place.

Local people and visitors enjoy this region for its tranquillity, coastal landscapes, beaches, Minsmere bird reserve, natural habitats, and dark skies. Sizewell C will have a negative impact on all these elements and keep visitors away from many parts of the coast and inland area. Local people from an expanding population will lose a treasured green space and recreational resource. The region will suffer greatly from a diminished tourism business and scope for people to enjoy the coastal landscapes.

2. Main development site

I worked on the SZB and C (proposed) projects in 1990's with the LPA; dealing with landscape mitigation, northern mounds, woodlands, marshland and tree belts amongst other aspects. These features are just maturing after some 30 years of life and much will now be removed by the construction of SZC.

Since the first submission of a SZC plant in the mid 1990's the development, lay down area, accommodation, and transport issues have escalated in terms of scale, site coverage and resulting impacts.

The main development site, as a result of its poor design, scale/mass, and loss of natural landscape will result in many impacts:

- **Significant landscape** and visual impacts across a wide area of coastal and inland landscapes.
- **The two nuclear reactor domes** will look ugly and incongruous. They will be framed by a mass of box shaped buildings dwarfing the current SZB white dome and making the impact from SZB seem fairly minor. This dome has become a familiar and iconic design albeit visually prominent in many views.
- A development of this magnitude should be designed with the upmost skill in order to create a high-class design both in terms of architecture and landscape setting. The poor design approach is summed up in the Design and Access statement which indicates a series of disparate structures across the site area, with many of the ancillary roads, buildings and car parks intruding beyond the main site area and into the natural landscape setting.
- **The proposed pylons** will create additional detrimental visual intrusion and harm to the landscape.
- **The landscape setting of the current B station** has been significantly impacted by the loss of Coronation Wood with the adverse intrusion of development into

this area. The woodland may have had some elements of poor condition, but this is purely a result of a lack of management over the years which could have been remedied if EDF had the interest in doing this. Removal of woodland should not been seen as an option whenever more development space is needed.

- **The Sizewell B relocated facilities, proposed Outage car park and access/fencing** will now intrude into the setting of the current station causing fragmentation and detrimental impacts on the acid grassland natural habitat and landscape. This proposal along with the works associated with Coronation Wood and the use of Sandy Lane as a haul route creates further intrusion into the Sandlings landscape area west of the SZB station.
- **The cumulative landscape and visual impacts** with the Greater Gabbard and Galloper sub stations have not been fully considered. LVIA Para 13.4.49 states that these developments exert an influence on local character, they clearly do. Further visual intrusion into the area will result in cumulative harm to the character of the AONB landscape. This aspect of industrialisation, coalescence of development, and lighting will result in significant harm to the Sandlings landscape.
- **The existing wind farm substation developments** have resulted in loss of habitat and woodland with the alleged landscape mitigation resulting in scattered dead trees and redundant plastic tubes across the Sandlings landscape including Broom Covert. This does not represent any form of sensitivity towards the treatment, protection or enhancement of the AONB landscape.
- **The permanent northern plant site access road and car park.** This was proposed to be temporary at Stages 1 and 2. At Stage 3 EDF failed to include any information or questions relating to this change of approach. The road will cause harm to the landscape (which currently has SSSI status) using hard materials, drainage, traffic movement, air pollution, noise, lighting, and the causeway to the car park. It is not clear how workers access the site from the car park, further hard footways/on site transportation is inevitable. Longer term, with a permanent access road there will inevitably be pressure for further ancillary developments within this northern area.
- Peter Youngman, one of our famous landscape architects developed a vision for Sizewell B and the EDF estate and his work is finally beginning to mature after decades of management. The development will remove large parts of that landscape including screening woodland, Kenton Hills and Goose Hills, the northern mound woodlands, with their thickets of holm oak, pine, and gorse planted in the 1990's, marshland habitats and tree belts. There is evidence of a lack of management in some of these areas with plastic littering the planting areas, this does not inspire confidence in the future estate management.
- The SZB station was designed with some imagination, with its iconic white dome and blue box it has become a local landmark and although seen against the backdrop of the concrete block of SZA both were until recently, partially masked in some views by the Coronation woodland.
- The proposed build is a series of large imposing buildings, ugly and incongruous, with little sign of sensitive design input, doubling the size of the

site footprint and with a lack of visual protection in local and wider views. The poor design approach comprises a series of disparate structures across the site area, with the buildings, access road, car parks and pylons intruding beyond the main site area causing landscape and visual harm.

- The recent **destruction of Coronation Wood**, planted around 1911 and containing a mix of evergreen and deciduous species has opened up views of both the large mass of SZA and SZB from the west and south west. The woodland provided good screening and valuable habitat. Many larger trees especially oak were present along its western boundary.
- The woodland formed an important visual backdrop to the marshland, and in views from the inland landscape. There are many important recreational views from footpaths through the area which are now exposed to open views of the Sizewell site. Once built the relocated SZB facilities buildings, extensive areas of car parking, lighting and the new access road along the west site boundary, will be prominent relying on the narrow fringing tree belts to the marshes for screening.
- As well as being harmful within the wider landscape, the SZC project will result in additional and cumulative impacts when considered with those already arising from the Greater Gabbard and Galloper sub stations.
- The wind farm substation developments have resulted in the loss and fragmentation of woodland with the landscape mitigation failing to produce any effective screening. What is now visible is a Sandlings landscape strewn with abandoned and redundant plastic tubes mostly containing failed plantings. All of this is visible from the public right of way along Sandy Lane and with the same effect littering the grassland landscapes north of the Galloper substation. The resulting landscape, part of the EDF estate does not represent any sensitivity towards the treatment, protection or enhancement of the AONB landscape.
- To provide some mitigation for the loss of Coronation Wood EDF proposed and have now planted a small area of the Pill Box field. The field is mostly dry acid grassland with some scrub, including willow on its fringes where the ground is damper. I believe that this land should be left as important natural habitat and not planted.
- The design of this planting rather oddly follows the outline of the proposed Outage car park submitted as part of the DCO and as shown on those plans. I believe the Outage car park has now been withdrawn from the DCO and so it is unclear why the planting is still informed by the outline of the previously proposed car park.
- The planting is clearly not replacement woodland nor will it offer any visual mitigation to either the SZB facilities buildings nor to SZC. My last visit revealed failed and poor quality plants, poor planting methods and flimsy tree tubes (rather than rabbit fencing) already collapsed and littering the ground.

3. Transport: Southern Park and Ride site

EDF chose to ignore both residents' and Wickham Market Parish Council's (WMPC) concerns regarding this site expressed during the consultation. Instead at Stage 3 the SP&R site was increased in size (to 1250 capacity plus a traffic incident management area) after the A12 Woodbridge site was removed from any further consideration.

The SP&R will draw traffic from a wide regional area and create significant highway problems for the A12 and the local road system, through the neighbouring parishes and villages. Traffic through Wickham Market is already problematic and often dangerous. The overall cumulative increase in traffic from SP&R and other local development traffic (allocated sites in LDF) will exacerbate traffic volumes, road and pedestrian safety, noise and air pollution.

EDF have stated (DCO) that they will fund mitigation measures for Wickham Market to deal with the adverse impacts arising from the massive increase in traffic which will pass through the village. To date EDF have failed to provide any overview or detail of such proposals despite heavy input from WMPC. Liaison over a 15-month period initiated by WMPC working through SCC has not resulted in any specific proposals.

WMPC and its neighbouring parishes have also advised on a number of design improvements which would reduce the landscape and visual impacts arising from the siting and design of the SP&R. Mitigation is needed to reduce visual impacts from a number of public right of way locations which EDF have failed to recognise. Night time lighting impacts will be significant and harmful to the landscape character of dark skies and residential amenity. We have requested simple and affordable landscape and habitat enhancements which will provide a legacy benefit beyond the life of the facility.

I support the further specific concerns and detailed points raised by WMPC in their DCO RR submission dated 21st September 2020 and subsequent documents submitted.

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I urge you to consider this brief description of some of the elements relating to the AONB landscape and the further impacts which will arise from this project and to ensure that our precious AONB and heritage coast does not become further degraded by inappropriate development of a scale completely inappropriate for this protected and valued landscape.

Anne Westover BA Dip LA CMLI
June 2nd 2021