

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 13 (16 September 2021)
– (ISH13) Landscape and Historic Heritage**

Suffolk County Council Registration ID Number: 20026012

Deadline 8

24 September 2021

Issue Specific Hearing 13 (16 September 2021) - (ISH13) Landscape and Historic Heritage.

Post Hearing Submissions including written summary of Suffolk County Council's Oral Case

Note: These Post Hearing Submissions include a written summary of the Oral Case presented by Suffolk County Council (SCC). They also include SCC's submissions on all relevant Agenda Items, not all of which were rehearsed orally at the ISH due to the need to keep oral presentations succinct. The structure of the Submissions follows the order of the Agenda Items but within each Agenda Item, the Submissions begin by identifying the main points of concern to SCC and then turn to more detailed matters.

Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 – Sizewell Link Road		
Landscape and visual impacts of the link road. To include, but not limited to: <ul style="list-style-type: none"> ▪ night-time lighting effects ▪ suitability of proposed landscaping scheme 	Discharge of Landscape Requirements Following discussions between the Local Authorities and the Applicant we have reached agreement that, whilst ESC will lead the discharge for landscaping for this scheme both within and beyond the Highway Boundary, rather than the discharge of requirements being split, there will be an additional provision for the undertaker to consult the highway authority regarding those proposals within the highway boundary before submitting details to ESC for approval. In this way, SCC would have input at the formative stages of such proposals (as well as consultation in the discharge process via Schedule 23, paragraph 1(4)). This would be on the basis of the following being included in R22A, which we understand is acceptable to the other parties:	Based on precedent from EA1 DCO

	<p>"(2) Before submitting details under paragraph (1) which relate to any proposals within the proposed highway boundary, the undertaker must consult the highway authority regarding those proposals."</p> <p>Current landscaping proposals</p> <p>SCC has identified a number of areas where there are discrepancies between plans for approval, those supplied to the authority for technical approval and other documents submitted by the applicant. These are generally where the lack of information particularly relating to the location and size of drainage lagoons means that the highway boundaries and landscaping cannot be determined. Also of concern are areas which are shown on plans unlikely to be adopted as public highway nor returned to the original landowner. Further detail is required on the future ownership and maintenance of these areas. These matters were raised in ISH11 and REP7-157. SCC (and ESC) will continue to discuss these with the applicant.</p> <p>Additional Landscaping</p> <p>We note the ongoing discussions between the applicant and Interested Parties as set at Sect 3.10 of REP7- 061 and the landscaping proposals set out at Appendix J of REP7-063 for a permanent Link Road scheme, the Council is supportive of these emerging proposals and await the outcome of further discussion and engagement.</p> <p>Lighting</p>	
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	<p>The Highway Authority considers that the applicant would need to set out effective control measures at the discharge of requirements stage. Indicative areas of street lighting are included within the plans not for approval (REP5-023) and the authority agreed with these in principle (REP7-157).</p> <p>Design (DMRB) SCC consider that a design according with the Design Manual for Roads and Bridges is appropriate for the SLR. While the local authority does have local specifications, these are for residential roads rather than those designed to support a large-scale construction project.</p> <p>Design (Speed Limits) Comments were made about the design speed limit for the SLR. SCCs policy is speed limits must be appropriate to the nature of the road. The SLR clearly a traffic dominated road designed for the SZC construction traffic and therefore guidance (see references, right) would indicate no speed limit other than the national limit is necessary. If a speed limit is imposed, it needs to be self-enforcing. If not, there is a significant risk that drivers will not comply with the speed limit and drive at higher speeds on a road where other road users may not anticipate such behaviour. This will be exacerbated post construction of SZC when traffic flows will be low for a road of this nature. It would not be appropriate to design a road to standards applicable to a road with the national speed limit and then impose a lower speed limit, since this would create an unnecessary (and unfunded) enforcement burden on the enforcing authorities.</p>	<p>Exq1 REP 2-192 LI 1.88</p> <p>SCC Speed Limit Guidance https://suffolkroadsafe.com/wp-content/uploads/2021/07/Speed-Limit-Policy.pdf https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/ https://suffolkroadsafe.com/wp-content/uploads/2021/07/Speed-Limit-Policy.pdf National Speed Limit Guidance</p>
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	The SLR speed limit matter is further discussed in SCC's D8 submission responding to [PD-052] Request for further information - Rule 17 Letter.	https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits
Additional monitoring and mitigation suggestions	SCC remains of the view that the legacy benefits of the scheme do not outweigh the range of harms beyond the construction period of the project. Therefore, the SLR should be temporary, as it is not a reasonable or necessary burden on the highways network or with regard to its impacts on the local environment and local communities in the long term.	
Agenda Item 3 – Southern Park and Ride		
Landscape and visual impacts of the park and ride facility. To include, but not limited to: <ul style="list-style-type: none"> ▪ night-time lighting effects ▪ legacy planting and landscaping provision ▪ cumulative effects 	SCC is content with the proposals and defers on matters of detail to the discharging authority, East Suffolk Council	
Additional monitoring and mitigation	No Comments	
Agenda Item 4 – Two Village Bypass		
Landscape and visual impact of the link road. To include, but not limited to: <ul style="list-style-type: none"> ▪ night-time lighting effects ▪ suitability of proposed landscaping scheme ▪ update by Applicant in respect of more detailed landscaping scheme 	<p>Discharge of Landscape Requirements See agenda Item 2</p> <p>Current Landscaping proposals See comments on SLR. Of specific concern to the authority is the location of the lagoon east of the River Alde bridge (REP7-157).</p>	

	<p>Additional Landscaping</p> <p>We note the ongoing discussions between the applicant and Interested Parties as set at Sect 3.10 of REP7- 061 and the landscaping proposals set out at Appendix J of REP7-063 , the Council is supportive of these emerging proposals and await the outcome of further discussion and engagement.</p> <p>Key residual issues are</p> <ul style="list-style-type: none">• Drainage lagoon 2 east of the river Alde. Details in REP5-120 Appendix G plate 8 and 13 conflict with that in plans for approval in REP5-020. The authority's position is that the lagoon is best placed adjacent to the TVB. The authority notes that the order limits are around 20m away from Whin Culvert while immediately adjacent to Foxburrow Wood so that the impacts of a cutting at the former should be no more than those at Foxburrow Wood.• Changes to highway design and landscaping adjacent to Farnham Hall and Mollets Farm that may result from noise mitigation and location of highway footways. <p>The authority is in discussion with the applicant and anticipates these issues will be resolved before final plans for approval are provided before the end of the examination.</p> <p>Lighting</p> <p>Other than a few minor technical details SCC agrees with the proposed lighting of the roundabouts (REP5-019) at each end of the TVB as stated in REP7-157.</p>	
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Additional monitoring and mitigation	SCC is aware that the Applicant is in discussion with a number of landowners and residents regarding potential noise mitigation, possibly in the form of bunds. The authority would welcome involvement in future discussions where they will affect adoption of highway infrastructure.	
Agenda Item 5 – Terrestrial Heritage		
Heveningham Hall Estate Impacts o Impact on assets and any remaining areas of disagreement o Any additional monitoring and additional mitigation suggestions	The Council defers to ESC on matters of built heritage	
National Trust Coastguard Cottage Impacts o Remaining areas of disagreement o Additional monitoring and mitigation suggestions	The Council defers to ESC on matters of built heritage	
Agenda Item 6 – Suffolk Coast and Heaths Area of Outstanding Natural Beauty Cumulative Impact		
Adequacy of assessment o Has sufficient weight been given to all of the defined qualities of the AONB?	SCC is content that the Applicant has given sufficient weight to the character and special qualities of the AONB relating to landscape and visual effects in their Landscape and Visual Impact Assessment. However, as set out in the LIR [REP1-044] (Table 2, item 2a and para 7.9), and REP5-176 (Agenda Item 2) there is a need to take a holistic approach to all of the defined qualities. SCC considers that, taking such an approach, the extent of harms (including landscape and visual harm) to the defined qualities is greater than assessed by the applicant in the ES. In that regard SCC considers that the applicant has not given sufficient weight to all those defined qualities in its initial formulation of the proposals.	

	<p>The Council does not consider that the applicant has taken all reasonable steps to reduce that harm (by following the mitigation hierarchy) in respect of both the connection to National Grid/removal of pylons, the provision of outage parking, (and by choosing for the SSSI crossing a single span bridge over and above a less ecologically damaging triple span bridge).</p> <p>However, the Council is in broad agreement that (subject to its concerns in relation to the specific issues above where it is continuing to press for refinements to the proposals), with all of the provisions that are now anticipated to be in place (including the Natural Environment Improvement Fund and the proposed Environment Trust), adequate mitigation and off-setting for the overall impact on the Area of Outstanding Natural Beauty is capable of being achieved if those matters are secured. Whilst there will remain some residual impacts to be weighed in the planning balance, SCC does not consider further mitigation/offsetting to be achievable.</p>	
<p>Assessment of other plans and projects</p> <p>o Will appropriate and proportional mitigation be secured within the project in respect of cumulative impacts?</p>	<p>Assessment of other plans and projects</p> <p>In respect of the Nautilus interconnection project, it is understood that National Grid Ventures are holding a non-statutory consultation on their proposals for 6 weeks from Tuesday 14 September – Tuesday 26 October.</p> <p>However, (subject to sight of the published content) the Council recognises that the information contained within this consultation is at pre-EIA Scoping stage, and therefore is unlikely to be</p>	

	<p>sufficient to warrant a change in the SZC cumulative assessment.</p> <p>No further information or change to the Eurolink interconnection project is known at this stage</p> <p>National Grid Electricity Transmission (NGET) is developing a new 2GW subsea electricity connection between East Anglia and Kent, the South East Anglia Link (SEAL). The project is still at a very early stage. NGET expect to hold a non-statutory public consultation on the project in the “new year” 2022.</p>	
Agenda Item 7 – Monitoring and Controls		
Relevant schedules within the draft Deed of Obligation o Schedule 17 Governance – Suffolk Design Review Panel	Defer to East Suffolk Council re Design Review Panel.	
Agenda Item 8 – Any other matters relevant to the agenda		
	<p>Requirement 22 should include works no 14B A12/B1119</p> <p>Requirement 22A and 23 should also include works no 14 Yoxford Roundabout</p> <p>Requirement 23 should include works 1B and 1C</p>	