

24 January 2017

FREEPOST SZC Consultation
EDF Energy Ltd

Dear Sirs,

Sizewell C Stage 2 Pre-Application Consultation

1. Introduction - Suffolk Preservation Society

I am writing on behalf of the Suffolk Preservation Society (The Society) regarding the 'emerging proposals' for the Sizewell C nuclear power station contained within the Consultation Summary Document and Consultation Document (Autumn/Winter 2016) which forms Phase II of the EDF public consultation exercise

The Society is a non-political, independent, self-funding charity that was established in 1929. Its charitable objects are 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". The Society also represents the Campaign to Protect Rural England (CPRE) in Suffolk.

Suffolk's built heritage, its historic buildings, conservation areas, diverse landscapes and the sustainability of its communities are a major part of the Society's work in protecting what is fundamentally important in and to the County. Scrutiny of any proposals that affect heritage assets are a particular focus in helping to protect a County landscape that has pride in and respect for its vernacular past. The Society campaigns on important issues which affect its area of work and works constructively with the County and local planning authorities and other relevant bodies to help achieve better outcomes in planning and the management of our historic natural and built environment. The Society works and promotes co-operation with other groups whose objects are consistent with its own, including town and parish councils and local amenity societies, on shared issues.

The Society acknowledges the important contribution that Sizewell C, if approved, will make towards securing the Nation's future energy needs and fully accepts that nuclear generation forms part of the Government's low carbon energy strategy. As such it would also appear realistic that existing nuclear sites such as Sizewell are considered for expansion. However whilst this project is a Nationally Significant Infrastructure Project where decisions will be made nationally, it is important to stress that the physical impacts will be experienced locally.

2. Summary

The proposed power plant and associated development represents significant environmental damage on an unprecedented scale in a sensitive location, much of which is nationally designated. The reasons for designating the AONB, namely conserving and enhancing the outstanding natural beauty of the area, have not sufficiently informed the proposals. The construction phase will cause massive disruption to communities in East Suffolk over many years and permanent change to our landscapes and heritage in both its natural and built form.

Suffolk's natural and built environment in this coastal belt is unique, remarkably undeveloped and strongly characterised by a sense of remote wildness. The resultant tranquillity provides both a quality of life for its residents and a major draw for tourists. However this isolation, by its own nature, is fragile and is easily damaged and quickly lost forever. This has been recognised by numerous statutory designations to protect these special qualities including AONB status as well as Heritage Coast, and includes areas of SSSI and Ramsar sites.

The industrialisation of a semi-natural landscape and the loss of countryside, woodland and farmland will result in a significant loss of tranquillity, scenic beauty, wildness and remoteness of Sizewell and adjoining settlements. The scale of the engineering works will also result in a significant loss of archaeological evidence. The resultant impact of the spoil heaps, borrow pits, and large scale engineering upon the setting of designated assets including an abbey, churches, farmhouses and other vernacular buildings that make a significant contribution to the special qualities of our county will be considerable. This will have a significant impact upon local communities as well as the economic benefits of tourism. The intrusion of large scale industrial development across numerous locations with their associated noise, disturbance and associated lighting will be considerable. It must be recognised that development of the Sizewell site cannot be at unlimited cost to the quality and character of our county and its communities.

3. Policy Context

The Society considers that, contrary to National Energy Policy Statements, no real legacy that represents a meaningful benefit to the county and locality will be forthcoming from the proposals in return for hosting Sizewell C.

The National Energy Policy Statements provide a number of relaxations, including a general presumption in favour of consent, which circumvent many traditional planning considerations. However these relaxations carry responsibilities for any developer, most importantly to have due regard and care to the locality affected, engineering the project so that it results in as little adverse effect as practicably possible. In fact there is a need to ensure the social and environmental fabric of the local communities are not weakened but strengthened. This is an overriding principle in the Policy Statements and requires the impact of proposals to be appropriately mitigated. Moreover, regard should be given, during the consideration of the scheme, to the legacy benefits from the scheme that may accrue.

4. Presentation and Consultation Material

We would like to register our disappointment at the inadequacy of the presentation material which consistently fails to denote statutory designations including the AONB, scheduled

monuments and listed buildings as well as local designations such as Special Landscape Areas and Conservation Areas.

It is worthy of note that on visiting a public exhibition four EDF representatives were asked where the boundary of the AONB was and none of them could identify it. With this lack of awareness of such critical constraints, it is apparent that the overall quality of the consultation material significantly underplays the sensitivity of the environment that will be affected by these proposals. The statutory duty on EDF is to have regard to the qualities of the AONB and designated heritage assets. It is difficult to see how this can be achieved when they are not annotated on their presentation material. We would ask that all future material is comprehensively and clearly annotated to assist in the understanding of the proposals.

The consultation documentation contains significant omissions, inaccuracies and an astonishing understatement of likely permanent impacts upon the cultural heritage and landscape quality and character of East Suffolk. Detailed environmental impact reports including heritage impact assessments, traffic impact analyses and landscape visual impact assessments across the entire range of proposed development are omitted.

The Society is extremely concerned that EDF does not acknowledge the national importance of this area in its setting, features and heritage. Section 3.6.4 of the consultation document states *“For example, the fact that the Sizewell area is designated as an AONB and a Heritage Coast in local designations may well be important and relevant....”*. This is clearly inaccurate on two accounts. Firstly the designation is a statutory designation and secondly it is not true to say that it ‘may well be important and relevant’ but it **is** important and highly relevant. Accordingly, there should be no detrimental impact upon the area’s environmental quality as a result of any expansion from Sizewell without appropriate mitigation and safeguarding.

The Society is disappointed in the scant level of detail provided in this phase II consultation exercise. Having discussed the latest plans with local community groups and some of the statutory consultees, it is clear that very little has substantially changed since the initial consultation phase and that the majority of their concerns remain unaddressed. Although the Society appreciates that this consultation is an additional stage that EDF has voluntarily included, the documentation fails to put in context the potential impact of the development on the receiving landscape and environment.. By portraying the project as a series of individual elements or options it is particularly difficult to gain any real appreciation of the potential cumulative implications. This could be very misleading, in particular to the general public.

With a lack of environmental detail it is currently difficult to fully understand and quantify the effects of the proposals and even more difficult to begin to evaluate the mitigation, residual impact and associated compensating enhancements that will be required. However the EDF ‘fly through’ model available during the public exhibitions appears to be a good approach to providing a more comprehensive visualisation of the whole development. It is hoped that EDF is willing to provide this model for use by all interested parties to gain a better insight to Sizewell C.

Before the Society can take a more informed opinion on the project it is critical that elements of the preliminary environment impact assessment are made available. This includes the initial heritage impact study and local visual impact assessment. However to aid the continued progress of the proposals the following summary of the Society’s initial key concerns is provided.

5. Transport

It is clear that there will need to be a multimodal approach to transport with potential key enhancements to all rail, port and highway infrastructure. One of our primary concerns relates to the amount of development traffic that will be introduced to the local road network, impacting heavily upon the countryside, villages and the quality of life for the local communities. Chapter 6 of the consultation document, para. 4.47 states that potentially 900 heavy goods vehicle movements and an assumed 700 light goods vehicle movements per day at peak phase of construction. Up to 400 bus movements per day will also be generated. This will result in the B1122 experiencing an increase in traffic movements from 3350 – 4950 per day to 5000 – 7600 per day – approximately a 50% increase. These figures starkly contrast with the assumed 100 people per day travelling by rail to Darsham. We are also concerned that the traffic modelling to date does not allow for seasonal changes of increased traffic on the A12 at peak tourist season in high summer.

5.1 Highways

In respect to site access the Society wishes to put on record its strongest reservations to the permanent crossing with flyover bridge/causeway through the SSSI to the north of the power station site.

The loss of 5 hectares of irreplaceable SSSI should be wholly exceptional and therefore a full environment impact is required, more extensive than that currently provided within the consultation documentation, and made public before any option is adopted by EDF for further development. This study should explain why other less damaging routes, avoiding the SSSI, have been discounted.

The Society favours a more enhanced rail/sea strategy to minimise the amount of freight brought in by road.

The current strategy shows that all of the workforce will be brought in by road. The implications for the A12 and the B1122 are very significant and this can only be ameliorated by a change in approach to managing this traffic during the construction phase. We strongly urge that EDF reviews this approach in favour of an enhanced rail strategy.

We wish to see more dispersed parking along the A12 corridor instead of the two proposed substantial car parks at Darsham and Wickham Market.

The proposed Wickham Market Park and Ride, is of particular concern. It will potentially result in significant visual impacts due to its unprecedented scale at 18 hectares, the level of operational activity for 20 hours a day, 7 days a week and the resultant light pollution. The indicated site entry point will involve the loss of trees and fragmentation of the footpath leading to Whin Belt. There is scope within this extensive site area to re-locate the entry point to a less damaging position. The removal of a significant section of Whin Belt woodland will degrade the landscape and reduce valuable screening. The impacts on designated heritage assets (Ash Cottage, 36 Ash Road and Rookery Farm), the Wickham Market and Marlesford Conservation Areas and the Ore and Deben SLAs need to be fully appraised, through an LVIA, in order to identify impacts and adequate long-term mitigation that is not solely reliant upon bunding.

In terms of highway improvements the Society's preference would be to support the previously approved route for a 4 Villages Bypass

This would significantly improve the traffic flow and the setting of numerous historic buildings and villages in Farnham, Stratford St Andrew, Marlesford and Little Glemham. However we acknowledge that this, although subject to a separate study in conjunction with the Sizewell development, does not form part of this consultation and therefore the Society's preference of the four main options being presented would be Option 4 (the Farnham and Stratford St Andrew bypass) thereby potentially facilitating part of the much sort after 4 Village Bypass. We would also comment at this stage that the potential demolition of the grade II listed Post Office at Farnham to facilitate road widening is unwelcome. The absence of any form of heritage statement is a serious omission and makes any meaningful assessment of the proposal impossible. In the event that the loss of the nationally designated heritage asset was outweighed by the public benefit of the highway improvements then it would be necessary to consider the appropriateness of relocating the building to an alternative location such as the East Anglia Museum of Rural Life for example.

The current proposal for the B1122 from Yoxford to fully accommodate the traffic to Sizewell C during the construction phase and beyond is totally impractical and unacceptable due to the harm that will result on the local communities and the environment.

The Society notes that Suffolk County Council had similar reservations that EDF had not addressed the needs of the local communities and environment from the reliance on the B1122 for Sizewell traffic and therefore commissioned the AECOM Route D2 and B1122 Study, published in December 2014. It remains unclear whether EDF has explored any of these potential options and the Society reiterates its Stage 1 request that a more detail reassessment of least harmful options be undertaken. In addition any highway improvements required at the Yoxford B1122 junction should be on a basis of minimal land take to avoid harmful environmental impacts. If the shift to increased movement of traffic by rail occurs any highway improvement could be significantly minimised and a signalised junction would be more appropriate than the roundabout option.

5.2 Rail

An increased use of rail will make an important contribution towards reducing the impacts on the highway network and communities in close proximity to the roads. Improvements to the rail infrastructure to facilitate this will provide a lasting legacy for the county.

The Society wishes to see the impacts of road traffic upon the character of a large number of rural Suffolk villages minimised. Therefore, we support the principle of a rail route into the construction site but greater assessment of the landscape and heritage impacts of various route alternatives is required in order to make a more informed comment.

In addition we strongly support upgrades to the East Suffolk line and Saxmundham – Leiston branch line. The double tracking should be reinstated from Saxmundham to Woodbridge to facilitate further passenger travel from the south. We would draw EDF's attention to the strong case presented by Suffolk County Council to the Office of Rail Regulation (23 August 2013) in response to the Draft Determination of Network Rail Outputs where they also stress the important role the East Suffolk Line plays in the region and the need for its enhancement in delivering greater connectivity. This would not only provide a real shift from road to rail use, including a substantive Sizewell C freight potential, but would enable many workers to access the site daily

from the population centres between and including Ipswich and Lowestoft. Furthermore it would provide a very welcome positive legacy through the retention of the new rail facilities post construction to encourage greater use of the railway and connectivity with local buses, cycling and walking.

6.Workers' Campus at Eastbridge

The Society considers that the proposed accommodation campus for 2,500 workers plus the associated caravan park at Eastbridge is unacceptable on the grounds of landscape and visual harm of a significantly scaled residential development in this remote location.

The proposed "village" of four and five storey blocks of flats will appear very alien in this remote location and would result in serious harm to the setting of the AONB. The tranquil character of this area would be devastated and the development would be intrusive and highly visible in the landscape. Moreover the setting of the grade II listed Upper Abbey Farmhouse will potentially be harmed. The Society also shares the concerns expressed by the local councils and communities close to Eastbridge regarding the stockpile areas proposed. Further information and assessment is required in order to appreciate the potential implications.

Whilst we acknowledge that this development is "temporary" we are concerned that post demolition and reinstatement there is a high risk that the site could be considered a substantial brownfield site. The Society also has concerns that its remote location will lead to significantly increased traffic on the highway network as the campus residents inevitably wish to escape the 'campus' environment for recreational purposes.

The Society strongly suggests that campus sites should be more dispersed and located closer to existing urban centres.

Potential exists to build on brownfield sites nearer to the Ipswich or Lowestoft conurbations. We consider that this accommodation development provides a unique opportunity to contribute a substantial number of low cost housing in the county and would recommend that EDF explores opportunities for a legacy housing project with local housing association(s).

7.Design Quality

Considerably greater effort is required to provide a development that responds appropriately to the visual and environmental sensitivity of the Suffolk Heaths and Coast AONB and Heritage Coast.

The Society reiterates its comments made during the Stage 1 Consultation in respect to design considerations that it is essential that the visual sensitivity of this location is adequately reflected in the quality of the design of the development. The proposed twin reactors of Sizewell C do not meet the iconic design quality of Sizewell B. Similarly, the indicative design of the accommodation campus buildings is bland and does not respond to its special and sensitive location.

8.Energy Transmission

Notwithstanding the reference at para 7.4.29 of the summary document which states that "no additional overhead line circuits should be required for Sizewell C in the vicinity of the site" the

Society would like further reassurance that this development will not result in the need for any reinforcement or extension to the current power transmission network either immediately at Sizewell or wider afield in the county.

9. Conclusion

The Society considers that the consultation document contains significant omissions, inaccuracies and an astonishing understatement of likely permanent impacts upon the cultural heritage and landscape quality and character of East Suffolk. The options presented give an artificially narrow view of the proposals and oversimplify the substantial environmental constraints and fail to give meaningful alternatives in many cases. Detailed environmental impact reports including heritage impact assessments, traffic impact analyses and landscape visual impact assessments across the entire range of proposed development are required. Without these it is impossible to make a robust and comprehensive response at this time. Therefore, due to this lack of environmental data against which to assess the special qualities of the heritage and landscape of Suffolk, our response is equally limited and we reserve our position until further data is available.

We trust that you find these initial comments constructive and we look forward to working closely with you in this respect.

Yours Faithfully,



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Director**

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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

Simon Amstutz, AONB Partnership

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