

**Confirmed**



Minutes of a Meeting of the **Cabinet** held in the Deben Conference Room, East Suffolk House, Melton on **Monday, 23 September 2019 at 6:30 pm**

**Members of the Cabinet present:**

Councillor Stephen Burroughes, Councillor Steve Gallant, Councillor James Mallinder, Councillor David Ritchie, Councillor Craig Rivett, Councillor Mary Rudd, Councillor Letitia Smith

**Other Members present:**

Councillor Jocelyn Bond, Councillor Alison Cackett, Councillor Maurice Cook, Councillor Mike Deacon, Councillor TJ Haworth-Culf, Councillor Mark Jepson, Councillor Rachel Smith-Lyte

**Officers present:**

Stephen Baker (Chief Executive), Lisa Chandler (Energy Projects Manager), Karen Cook (Democratic Services Manager), Philip Ridley (Head of Planning and Coastal Management).

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**1 Apologies for Absence**

Apologies for absence were received from Councillor Brooks and Councillor Kerry.

**2 Declarations of Interest**

There were no declarations of interest.

**3 Sizewell C Stage 4 Public Consultation Response**

Cabinet received report **ES/0155** by the Deputy Leader and Cabinet Member with responsibility for Economic Development who reported that EDF Energy was proposing to build a new nuclear power station at Sizewell. Following the Stage 3 consultation at the beginning of the year, which was discussed at Cabinet on 11 March 2019, a fourth round of consultation on specific elements of the proposal had been launched.

The report before Cabinet set out a summary of the draft response to EDF Energy's Stage 4 consultation, with the full draft response in the appendix. It was proposed that Suffolk County Council and East Suffolk Council, both statutory consultees in the process, submit a joint response to the consultation, as they had done in the three previous consultation stages. It was considered that such a joint response would give greater weight to the views of the two councils.

It was expected that EDF Energy would formally submit an application for development consent early in 2020 that would be determined by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) following examination by the Planning Inspectorate.

The primary purpose of the report before Cabinet was to explain the key changes in the proposals compared to Stage 3 and propose a stance on the topic areas. The report also updated on the progress that the councils had made putting the case for Suffolk to Government. A particular issue within this was the cumulative impact of all the planning issues arising from all the national infrastructure projects in East Suffolk and the representations the Councils would make to Government.

The report also considered the next steps for the councils and it included consideration of a consultation by BEIS, on the “Regulated Asset Base” funding model which was proposed to be used for Sizewell C.

The councils’ report was prepared after a community consultation event with the parish councils on 26 July 2019 and, alongside representations from local residents, drew upon their advice and local understanding. The councils had also discussed the issues raised by EDF Energy with other statutory consultees. The councils were referencing existing work and understanding arising from membership of the New Nuclear Local Authority Group (NNLAG), this included reference to the draft version of a longitudinal study funded by NNLAG regarding impacts of Hinkley Point C which was in its final stages but not yet published.

Evidence to support the recommendations was set out in the main body of the report with further technical detail contained in the Appendix.

Cabinet was advised that Suffolk County Council was taking a similar report with the same response attached to its Cabinet meeting on the 24 September 2019.

The Deputy Leader and Cabinet Member with responsibility for Economic Development stated that he welcomed the stage 4 consultation and the opportunity to comment. He was, however, disappointed that the opportunity had not been taken by EDF Energy to clarify and fully evidence more of the issues raised by the councils at Stage 3, and previous, leaving the councils unable to come to an evidence-based view on so many matters. Amongst many other issues the councils were particularly disappointed that the issues referenced within paragraph 8.59 had not been addressed.

The Deputy Leader and Cabinet Member with responsibility for Economic Development and the Head of Planning and Coastal Management summarised the contents of the report, stating that East Suffolk had hosted nuclear power at Sizewell since Sizewell A, which was commissioned in 1966. Sizewell B was the UK’s only commercial pressurised water reactor and was commissioned in 1995. It was still generating now, it was anticipated that its lifetime would be extended by 20 years, taking its forecasted decommissioning date to 2055. Sizewell A currently had 170 staff on site and managed the Bradwell B site which was now in its care and maintenance programme. Sizewell B currently had 544 members of staff and around 250 contracting partners, it added approximately £20m to the local economy which doubled during an outage. Sizewell C (two reactors) was forecast to have 900

operational posts, it was expected to put at least £100m a year into the regional economy during construction and £40m a year during each of its 60 years of operation.

In respect of key areas for consideration related to the main elements of change, it was reported that there was an alternative freight management option – integrated strategy; there was an alternative approach for traffic management through Wickham Market (no details yet); there was a new option for a rail-head at land east of Eastlands Industrial Estate; the Sizewell Link Road would possibly be removed post-construction; flood mitigation areas; ecological mitigation areas; 7900 plus 600 workers proposed (no longer sensitivity testing); and red line changes across the project's main development site and associated development sites.

Cabinet was advised of the three transport options proposed – rail-led, integrated, and road-led. The main issue of concern for East Suffolk Council was the rail line, there being significant concerns regarding noise and vibration.

Cabinet was advised that another element of concern was pylons, there were currently two options, option 1 – four pylons, three reduced in height by 25%, and option 2 – five pylons, all reduced in height by 25%. Neither were attractive to the councils.

Cabinet was further advised of other additions since the Stage 3 consultation, there were two compensation areas to mitigate loss of floodplain at the SSSI crossing; up to three potential Marsh Harrier mitigation areas; and proposed Fen meadow mitigation (loss of SSSI).

Other minor changes included confirmation of offsite sports facilities at Leiston Sports Centre / Alde Valley Academy; minor changes to red line at the main site (ie at the entrance roundabout, which included Round House; minor changes to the red line at AD sites (link road, 2VBP, park and ride sites, freight management facility, junctions) to reflect further design work including water management; and the Yoxford Road roundabout, move by 20 metres, which EDF Energy suggested would allow offline construction.

In respect of social and economic, mitigating impacts, there were references to embedded environmental principles and mitigation for the project; project benefits including minimum 1000 apprentices, work with Suffolk colleges and businesses, aim to meet nuclear sector target of 40% female workforce; reference to a Community Fund to promote the economic, social and environmental well-being of communities; and property support, work with local potentially affected residents to explore alternatives to statutory blight claims.

Cabinet was advised that there were several things missing from the consultation: There was no reference to changes to development on Goose Hill, a key concern for the councils at Stage 3; response to network highway issues raised by the councils at Stage 3, ie Woodbridge contribution and other junctions ie Bredfield; response to consultees comments on public rights of way level crossing closures in rail-led option; details of construction programme and delivery of associated sites; removal of a marine-led strategy; no response to concerns regarding coastal processes, beach

landing facility, SSSI Crossing, and Northern Mound; plus other issues as referred to in paragraphs 354 to 376 within the report.

Cabinet was apprised of areas of difference between the East Suffolk report and the Suffolk County Council report; the recommendation was very similar between the two councils, but the response differed in two sections: The Sizewell Link Road: East Suffolk Council considered that should a road-led strategy be considered above a marine or rail-led strategy that the route demonstrated for the Link Road was potentially acceptable subject to further detailed studies and assessments. Also, in respect of retention of the Sizewell Link Road post-construction, East Suffolk Council continued to not support proposals to remove a Sizewell Link road and recognise the benefits of a separate HGV route to serve the existing A and B stations as well as the new C station.

The Cabinet Member with responsibility for Customer Services and Operational Partnerships referred to the rail and road options, with extended hours for HGVs, possibly 24 hours a day; he requested further information in respect of this. The Head of Planning and Coastal Management explained that, at this time, nothing had been agreed in respect of overnight generation; significant discussions were required and dialogue was taking place with EDF Energy.

The Cabinet Member with responsibility for the Environment stated his concerns regarding insufficient mitigation; he asked if there would be an analysis to ensure that this was strengthened. The Head of Planning and Coastal Management responded, stating that officers would be working diligently on this and the Deputy Leader and Cabinet Member with responsibility for Economic Development added that consultants would be utilised as necessary.

The Cabinet Member with responsibility for Planning and Coastal Management stated that the report made it clear that what was planned for coastal defences was not certain; he was concerned regarding this. The Head of Planning and Coastal Management, in response, stated that there was a lot of ongoing dialogue, in particular trying to understand what EDF Energy's proposals were; officers had not yet had sight of all of the proposed details in relation to coastal processes. There were outstanding concerns related to the position of the station platform and there were potential amenity impacts with the future predicted loss of beach. These issues were raised during the stage 3 consultation. All matters would be addressed as part of EDF's application for development consent. The Head of Planning and Coastal Management, in conclusion, stated that officers were working diligently on this matter.

Councillor Haworth-Culf stated that she could not find a reference to coach movements within the report. This, she stated, alongside HGV movements, was an important issue. She asked for confirmation of the proposed numbers, on a daily basis, together with mitigation information. The Head of Planning and Coastal Management stated that coach movements were included in the transport assessments; his understanding was, he stated, that there would be 400 movements a day, 200 in and 200 out. It was explained that this was not part of the current consultation because nothing had changed since previous iterations.

Councillor Bond asked, in the light of the lack of information, if it was felt that the joint proposed response was sufficient to protect the area, bearing in mind rising sea levels and the impact, ie health, wellbeing and tourism, that would be felt by everyone in the area. The Head of Planning and Coastal Management stated that it was believed that the response was adequate. He added that Cabinet should bear in mind that this was a process undertaken by EDF Energy, the Council was just a consultee in the process. It was, he stated, incumbent upon EDF Energy, in their application in 2020, to include all the information so that the Secretary of State could make a reasoned decision. The Head of Planning and Coastal Management added that if the application was submitted without that information, that would be the appropriate time for the Council, if it so wished, to make comments in relation to that.

Councillor Haworth-Culf referred to the many East Suffolk Council policies that referred to the importance of tourism for the district; she asked for an assurance that these policies would be reviewed and, where appropriate, be updated to reflect what would happen with Sizewell. The Head of Planning and Coastal Management stated that tourism was indeed a key factor and the Council would need to assess the impact on this. The Head of Planning and Coastal Management referred to the National Policy Statement and said that this was written in a way that made it clear that there were eight sites nominated across England and Wales and there was the presumption that they would be delivered to provide energy in the country. That was the context against which the Council should assess the local impact, in the best and most positive way.

The Leader stated that the Council needed to be realistic and pragmatic in its approach and that that would involve commitment and compromise; it also needed to be honest with the public. He stated that the report before Cabinet was a culmination of many hours of work by officers and he gave thanks for that.

The Assistant Cabinet Member with responsibility for Transport stated that she did not think the roads in Suffolk could cope; in her view they were not big enough, and this was a concern for her.

The Cabinet Member with responsibility for Customer Services and Operational Partnerships stated that, in his view, the Council was faced with a double edged sword; Sizewell C offered huge economic benefits to the area. It was, he said, a slightly worrying proposal that was put to the government in 2018 about funding a four villages bypass. This August, statistically, had been the busiest time for road capacity on the A12, more than ever recorded, so, mitigation was needed in respect of the road network. Sizewell C was, Councillor Burroughes stated, a huge opportunity for the district's tourist economy; he stated that, in fact, people had been going to Hinkley to view the construction. There were many benefits to having Sizewell C but, clearly, that would come with disadvantages. The benefits must outweigh the disadvantages. Councillor Burroughes added that it was critical that Suffolk County Council and East Suffolk Council worked together. Councillor Burroughes, in conclusion, stated that he was happy to support the recommendations within the report, pending clarification of the issues outstanding; he hoped that officers would press EDF Energy to obtain the answers that were needed.

The Cabinet Member with responsibility for the Environment stated that he was mindful that East Suffolk Council would achieve the best deal possible for its residents. The environment was not just trees and grasses, it was also about buildings and infrastructure work. Councillor Mallinder stated that the Council needed to be mindful of what the UK was trying to achieve in trying to be carbon neutral. A diverse portfolio of energy was needed and nuclear had to be part of that. However, Councillor Mallinder stated that he had reservations regarding the proposals and he felt that mitigation needed working on.

Councillor Mallinder stated that he was concerned regarding the accommodation for workers; he did not understand why EDF Energy was not proposing a futuristic way of living, a zero carbon footprint, electric bikes, cycle routes, and electric cars. Councillor Mallinder stated that transport was also a concern for him; priority should be marine first and roads last. In conclusion, Councillor Mallinder stated that he wanted something, for East Suffolk, in return for Sizewell C; he wanted to see more investment by national government in helping East Suffolk deal with these big issues. That said, Councillor Mallinder stated, East Suffolk would need to be careful not to take this project at any cost. Councillor Mallinder stated that today should be protected in order to ensure tomorrows were secured.

Councillor Haworth-Culf thanked all members of the public who had responded to the consultation; she added that the devil was in the detail and she felt that sufficient detail had not been received. Councillor Haworth-Culf stated that it must be ensured that, when more detail was received, it be communicated out to those who had responded. She added that the benefits of Sizewell C must outweigh the negatives; there would be a huge impact on the area and East Suffolk Council must represent the views of the public.

Councillor Smith-Lyte stated that she echoed the views of many of her colleagues; she said that if Sizewell C was allowed to go ahead the tourists would stop coming to the area; she referred to Sizewell C being hugely expensive and stated that, by the time that it was built, the technology would be redundant. Councillor Smith-Lyte stated that mitigation should not keep endlessly happening and she also said that wildlife were territorial and needed space.

The Leader stated that Members must remember that they were there to consider the Council's response to the consultation; it was not within the Council's power to say yes or no to Sizewell. He believed that the draft response was sensible, realistic and balanced in its approach, but he acknowledged that a lot more detail was needed. In conclusion, the Leader stated the importance of achieving the best deal possible.

The Deputy Leader referred to the earlier comments in respect of whether the Council was being robust enough in its response; he believed that it was, and referred to a balanced, evidenced based approach. He believed that the Council needed to be fair and take this approach; he believed that if the Council asked for too much the Planning Inspectorate would disregard its comments.

The Deputy Leader gave thanks to Geoff Holdcroft, who had been a former chairman of NNLAG; he also thanked colleagues from Suffolk County Council for working together on a joint response and he gave thanks to officers for their work.

In conclusion, the Deputy Leader reported that an Equality Impact Assessment had not been undertaken as East Suffolk Council was responding to the planning proposals of EDF Energy Energy. As such, EDF was required to satisfy the EqIA requirements.

## **RESOLVED**

1. That East Suffolk Council responds to the EDF Energy Stage 4 consultation, and that it continues engagement with Government and key partners as set out below. This set of recommendations is aligned to a report being taken to Suffolk County Council's Cabinet on 24 September 2019.
2. That it be agreed that the response set out in detail in the Appendix and summarised below will be submitted jointly, following its agreement by Suffolk County Council on 24 September 2019.
3. That EDF Energy be informed that, in line with the position agreed at the Cabinet Meeting on the 11 March 2019, the Stage 3 representation submitted by Suffolk County Council and (then) Suffolk Coastal District Council, and the response submitted by Waveney District Council remains valid with additional comments raised in the response in the Appendix.
4. That this Council welcome EDF Energy carrying out a Stage 4 public consultation and the opportunity to comment on revised / updated aspects of its proposals. However, it is disappointed that EDF Energy has not taken this opportunity to respond to key elements of concern raised in our Stage 3 response as detailed in paragraph 8.59 of the report.
5. Based on the new information put forward in the Stage 4 Consultation, this Council wishes EDF Energy to particularly address the following points:
  - a) As highlighted in the joint Stage 3 response, this Council expects EDF Energy to use a deliverable sustainable transport strategy to transport materials to/from the site. Unless there is strong appropriate evidence and justification, deviation away from a sustainable transport strategy should be considered to be unacceptable and this Council continues to expect maximising the use of marine- and rail- based transport to transport materials to / from the site. This Council is disappointed that Stage 4 suggests that the lack of progress on the rail-led strategy is now jeopardising delivery of this option.
  - b) Based on the above, this Council expects EDF Energy and other stakeholders including Network Rail to prioritise pursuing the rail-led strategy and confirms that we will support EDF Energy where required in pursuing a rail-led strategy above alternative road-led options. This Council expects EDF Energy to provide proportional mitigation to address its impacts at locations where their traffic is exacerbating a capacity or road safety concern, most prominently at the A12 in Woodbridge, but also other locations to the North of Woodbridge.
  - c) This Council expresses its continued opposition to four new tall pylons to the development site, which would have considerable detrimental impact on the AONB, and the options presented at Stage 4 do not appear to significantly reduce this impact;
  - d) This Council is pleased to see revisions to the layout of the Land east of Eastlands Industrial Estate (LEEIE) but expresses concern about the continued lack of detail in particular in relation to surface water drainage solutions for the site.
  - e) This Council welcomes the additional ecological mitigation and compensation areas, for Fen Meadow and Marsh Harriers, but is concerned that the feasibility of these sites cannot be evidenced and overall ecological mitigation and compensation for the whole Sizewell C DCO remains insufficient.

f) This Council welcomes the identification of flood compensation areas but will rely on the Environment Agency to provide expert advice as to their suitability, size and locations. Further detail is required for this Council to comment on the environmental impacts of these options.

g) At Stage 3, this Council was content with EDF Energy's explanation for their selection of the route of the Sizewell C Link Road. We did not consider there was any value in removing the Link Road post-construction, we recognise the legacy benefit of a Sizewell Link Road in providing a direct HGV link to the existing Sizewell A and B sites as well as the proposed Sizewell C station.

h) This Council welcomes the commitments made for project and economic benefits of the programme including the Community Fund, but requires further work related to the increase workforce number of 8,500 and its impact and required mitigation on local housing and tourism accommodation, workforce displacement, health and other socio-economic issues.

6. That the Head of Planning & Coastal Management in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development be authorised to make any amendments to the draft response as agreed with the appropriate representatives of this Council.

7. That this Council engages with EDF Energy and Network Rail, and where appropriate the Department for Transport, to identify and remove barriers to delivery of the improvements to the East Suffolk Line and hence timely implementation of the rail-led strategy, whether this is through the DCO process or Transport Works Act Order.

8. That Cabinet notes the continued work with Government, namely Ministry for Housing, Communities and Local Government (MHCLG) and BEIS with regards to cumulative impacts in East Suffolk of the numerous energy related projects existing and forthcoming.

The meeting concluded at 7:40 pm

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Chairman