



EXTRAORDINARY FULL COUNCIL

3 September 2020

DEVELOPMENT CONSENT ORDER FOR EDF ENERGY / SZC CO. SIZEWELL C NEW NUCLEAR POWER STATION – RESPONSE OF EAST SUFFOLK COUNCIL – DRAFT RELEVANT REPRESENTATION

EXECUTIVE SUMMARY

1. EDF Energy has submitted a nationally significant infrastructure proposal for a new nuclear power station to be located at Sizewell on the East Suffolk coast. The application was submitted to the National Infrastructure Unit of the Planning Inspectorate (PINS) on the 27 May 2020 and accepted on 24 June 2020. The formal Section 56 engagement began on the 8 July and will close on the 30 September 2020 by which time the Council has to submit its Relevant Representation.
2. The proposals have been the subject of pre-application consultation with the Council and four formal rounds of public consultation, the last of which ended in September 2019. East Suffolk Council is a statutory consultee in the decision-making process. The Secretary of State for Business, Energy, and Industrial Strategy will make the final decision on the proposals, based on the recommendation of the Examining Authority (appointed by PINS), following an examination process. Five Inspectors have been appointed by PINS to examine the proposal. East Suffolk Council's priority is to ensure that should the Sizewell C new nuclear power station be granted consent by the Secretary of State, we have achieved the best possible outcome by virtue of maximising benefits, minimising adverse impacts, and achieving mitigation and compensatory measures for the district.
3. This report provides a summary of the emerging considerations to be set out in the Relevant Representation, with a preliminary draft provided in the Appendix. East Suffolk Council has been working closely with Suffolk County Council (SCC) on this project and sharing technical expertise. This report is to enable all East Suffolk Councillors to provide

local input into the emerging Relevant Representation to ensure it is appropriately representative of the District.

4. Copies of the SZC application documents are available on the PINS website at www.infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/?ipcsection=overview.
5. Full Council is being asked to endorse and support the Deputy Leader and Cabinet Member for Economic Development in seeking delegated authority as detailed in the recommendation, in conjunction with the Head of Planning and Coastal Management, from Cabinet.

Is the report Open or Exempt?	Open
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Wards Affected:	Directly: Aldeburgh and Leiston, Wickham Market, Kelsale and Yoxford, Saxmundham, Halesworth and Blything, Orwell and Villages, Rendlesham and Orford, and Deben. Indirectly: Melton, Martlesham and Purdis Farm, Woodbridge, Framlingham, Lowestoft Wards: Gunton and St Margarets, Oulton Broad, Harbour and Normanston, Carlton and Whitton, and Kirkley and Pakefield.
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Cabinet Member:	Councillor Craig Rivett Deputy Leader & Cabinet Member with responsibility for Economic Development
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Supporting Officers:	Philip Ridley Head of Planning & Coastal Management 01394 444432 Philip.ridley@eastsoffolk.gov.uk Lisa Chandler Energy Projects Manager 01394 444538 lisa.chandler@eastsoffolk.gov.uk
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1 INTRODUCTION

- 1.1 EDF Energy/SZC Co. has submitted an application to build a nuclear power station at Sizewell. This will be a very significant development for Suffolk. This proposal is being considered under the Nationally Significant Infrastructure Project (NSIP) process, under the Planning Act 2008. EDF Energy/SZC Co. submitted a Development Consent Order (DCO) application on 27 May 2020 and the Planning Inspectorate (PINS) accepted the application, confirming it was valid on 24 June 2020. The application is now within the pre-examination stage of the DCO process. The DCO will be determined by the Secretary of State for Business, Energy, and Industrial Strategy (BEIS), taking into consideration a report and recommendation from the Examining Authority (appointed by PINS), following an examination process.

National Policy Context

- 1.2 The principle of new nuclear development was agreed by national government, and its policy is enshrined in National Policy Statements (NPS) for Energy (EN-1) and for Nuclear Power (EN-6). NPSs will be taken into account by the Examining Authority, along with other considerations, in determining this application. They were designated by the then Secretary of State for Energy and Climate Change on the 19 July 2011. An updated version of NPS EN-6 is expected to be published by the Government, but this is currently delayed – this revision will take into account deployment of new nuclear sites by 2035. The publication and designation of the NPS followed the Planning Act 2008. The overarching NPS EN-1 for Energy states that we should encourage a diverse mix of technologies and fuels, so that we do not rely on any one technology or fuel. We also need sufficient electricity capacity as it cannot be stored. The system must be able to accommodate unforeseen fluctuations in supply or demand. The aim is to maintain security of supply as we move to a low carbon economy. In 2019, the UK Government committed to the 100% reduction Net Zero target to reach net zero greenhouse gas emissions by 2050. Changes are needed to reach this, including extensive electrification, particularly of transport and heating, supported by a major expansion of renewable and other low-carbon power generation.
- 1.3 NPS EN-6 includes a list of potentially suitable sites for the deployment of new nuclear power stations before the end of 2025. Sizewell is included as one of those suitable sites and a high-level analysis of its impacts is contained in EN6 Vol II. Vol II is also clear that it assessed alternatives, as required, by the Habitats Directive in the Habitats Regulations Assessment, and that there are Imperative Reasons of Overriding Public Interest (IROPI) that required the NPS to be designated.
- 1.4 In assessing IROPI, the Government considered: why new generating capacity was needed, why there is a need for nuclear power as part of the generating mix, why it is necessary for the sites assessed as potentially suitable to be listed in the NPS, why not sites at different locations, and why the Nuclear NPS was needed. The IROPI relate to the protection of human health, public safety and overriding beneficial consequences of

primary importance for the environment. Further detail can be read in NPS EN-6 Vol. II, but it concludes that because of the

‘urgent need to reduce carbon dioxide emissions in order to avoid significant, long-term adverse environmental, social and economic consequences, whilst maintaining security of energy supply and preserving public safety and public health, the Government believes that nuclear generation needs to be part of the future low carbon electricity generation mix.’

It is clear that with a 10-12 year build time, Sizewell C is not capable of deployment by 2025, as such NPS EN-6 is a material planning consideration in the DCO process but not the only policy that the proposal is considered to comply with. On 7 December 2017, the Government published a Written Statement on Energy Infrastructure. This Statement, as well as reiterating the need for new nuclear, explained that for projects not capable of deployment before 2025, but listed in NPS EN-6, maintain strong Government support in principle and that section 105 of the Planning Act 2008 would apply to the decision on whether or not to grant development consent for the project.

1.5 Section 105 of the Planning Act 2008 states:

105 Decisions in cases where no national policy statement has effect

(1) This section applies in relation to an application for an order granting development consent if section 104 does not apply in relation to the application.

(2) In deciding the application, the Secretary of State must have regard to –

(a) any local impact report (within the meaning given by section 60 (3)) submitted to the Secretary of State before any deadline specified in a notice under section 60 (2),

(b) any matters prescribed in relation to development of the description to which the application relates, and

(c) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision.

Covid-19 Impacts

1.6 The Covid-19 crisis appears to have shifted priorities for national government and a period of economic stimulus is expected to be necessary to support recovery. As local authority, this economic recovery is supported, and it is becoming clear that supporting major infrastructure proposals is one way the Government seeks to support recovery. As such, it is anticipated that proposals such as Sizewell C new nuclear power station are likely to be supported by national Government.

1.7 On the 1 July 2020, the Secretary of State for BEIS issued his decision in relation to Vattenfall’s Norfolk Vanguard Offshore Windfarm. This was an interesting decision as the Secretary of State granted consent for the wind farm despite the Examining Authority recommending refusal. The Examining Authority had concluded that consent should not be granted due to the potential impact on habitats and species afforded protection under the Habitats Directive. The Secretary of State disagreed and concluded the project

would not have an adverse effect. The full decision is available:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010079/EN010079-004278-SoS%20decision%20letter.pdf> and further officer assessment of the decision is available.

However, it is important to note that the decision concluded that the benefits of the project outweighed its adverse impact and made reference to the strong endorsement of offshore wind electricity generation set out in the NPSs.

- 1.8 Given the existing endorsement of new nuclear power in the NPSs, it is considered to be imperative for East Suffolk Council to ensure that if this development is going to be approved, that it is carried out in a manner that benefits our residents and our local economy and where there are adverse impacts, these are, where possible, fully mitigated and/or compensated. As such, this Council will continue to challenge EDF Energy/SZC Co. to ensure the development is of the highest standard achievable. Further, this Council will continue to challenge the Government and the Planning Inspectorate to ensure the proposal is held to account, and we will maximise opportunities for mitigation and where not possible, compensation for East Suffolk. Alongside this, this Council will be ensuring that we maximise the legacy potential arising from the proposal through skills improvement, sports and leisure provision, tourism boosts, supply chain improvements and education improvements.

DCO Process

Following acceptance of the applications by PINS, the promotor has a duty to publicise the applications in accordance with the 2008 Planning Act. The notice provides a deadline of 30 September 2020 for the submission of Relevant Representations on the project to be received. A Relevant Representation is a summary of a person's or an organisation's views on an application in writing. The submission of a Relevant Representation registers the author as an Interested Party, which ensures that they can take part in the examination process. As one of the host authorities, East Suffolk Council will automatically be identified as an Interested Party. However, the Council considers it is important to still submit a Relevant Representation to PINS, as this will help the Examining Authority determine the key topics and issues to be addressed during the Examination stage. By making our Relevant Representation as detailed as we can at this stage, we are clearly setting out discussion areas for the Examination.

- 1.9 As a statutory consultee, the Cabinet will consider and agree the final version of the Relevant Representation at its meeting of 21 September 2020. One of the terms of reference of the Council's Strategic Planning Committee (SPC), amongst other things, is to consider and advise the Council and Cabinet where appropriate on planning matters impacting the whole of the district, including NSIP applications. The Council's Committees receive their delegated powers and terms of reference from the full Council. Given the impact of this application on the whole of the district, it was considered appropriate that the Council, rather than the SPC, consider it, so that all Members of the Council have the opportunity to discuss it. Following these discussions, it is hoped that the draft Relevant Representation can be endorsed by Council, as a work in progress, alongside any updates or revisions to the said document, as detailed in the discussions at

this meeting, that they be considered by the Deputy Leader and Cabinet Member for Economic Development and the Head of Planning and Coastal Management, and that they be attached and reported for consideration by Cabinet on 21 September 2020.

DCO Proposal

- 1.10 Sizewell C is a nuclear power station proposed to comprise as permanent components:
- Two UK European Pressurised Reactor units made up of reactor and associated buildings, plant and infrastructure, and turbine halls and electrical buildings;
 - fuel and waste facilities, including interim storage for radioactive waste and spent fuel;
 - an operational service centre (including offices), a training building, and ancillary, office and storage buildings;
 - a cooling water system and combined drainage outfall in the North Sea;
 - drainage and sewerage infrastructure;
 - transmission infrastructure including 400kV overhead lines and pylons, a National Grid 400kV substation and associated modifications to the existing National Grid transmission lines;
 - backup power source and emergency response equipment store at Upper Abbey Farm;
 - internal roads, a causeway to cross the Sizewell Marshes Site of Special Scientific Interest (SSSI), car parking, and a vehicle search area;
 - sea defence and a beach landing facility;
 - relocation of facilities at the Sizewell B site;
 - an access road including a new roundabout to join the B1122;
 - Two Villages Bypass;
 - Sizewell link road;
 - Other minor highway improvements;
 - Upgrades across the East Suffolk Line to improve rail safety; and
 - landscaping of the areas to be restored following use during construction.

During the construction period which is anticipated to last between 9 and 12 years, there will be additional components required (these will be removed post- construction and the land either re-instated or improved in accordance with the reinstatement and landscape plan, including:

- Northern Park and Ride facilities, Darsham;
- Southern Park and Ride facilities, Wickham Market;
- Freight management facility, Seven Hills;
- Construction land, railhead, stockpile, early years park and ride and caravan sites at Land East of Eastlands Industrial Estate (LEEIE), Leiston;
- Construction working compounds (parking, laydown areas, working areas, and related works and structures);
- An induction centre, site offices, and temporary structures, including a concrete batching plant;
- Temporary rail infrastructure, including a rail route into the main development

- site;
- Site access, construction roads, fencing, lighting, security features, landscape bunds and screening;
 - Temporary spoil management areas, including borrow pits and stockpiles;
 - Public access works, including permanent and temporary closures and diversions of public rights of way;
 - water management zones, utilities, and services infrastructure; and
 - an accommodation campus.

Sizewell C nuclear power station, with the potential output of 3,340MW once operational, would provide approximately 7% of the UK's electricity needs, equal to powering approximately 6 million homes. This should also be seen in the context of the existing Sizewell B station and the numerous offshore windfarms that are connecting to shore in the council area. It is estimated that if all schemes were to be delivered, East Suffolk will be accommodating 25-30% of the UK's electricity.

- 1.11 East Suffolk Council and Suffolk County Council have been working closely together in responding to the proposals, as well as with other Statutory Consultees. Previously, prior to the merger of Suffolk Coastal District Council and Waveney District Council, joint responses were submitted in relation to the different consultation phases between Suffolk Coastal District Council and Suffolk County Council, with Waveney District Council sending their own independent response. It has been made clear in previous consultation responses that the Council is supportive of the principle of new nuclear development, both in terms of seeking to reduce carbon emissions and creating sustainable economic growth in east Suffolk, provided this can be achieved without unacceptable damage to the environment, residents and businesses and tourist economy of Suffolk.

PLANNING POLICY CONTEXT

- 1.12 The proposals are considered as NSIPs under the Planning Act 2008; consent for an NSIP takes the form of a DCO. The Planning Act 2008 makes provision for National Policy Statements (NPS), which set out the policy framework for determination of NSIP applications. The two NPSs of relevance are EN-1 (Overarching NPS for Energy), and EN-6 (NPS for Nuclear Power Generation) – see para.1.2 – 1.4 of this report for national policy context.
- 1.13 The revised National Planning Policy Framework (NPPF) published in 2019 does not contain any specific policies for NSIPs, however, it remains a material consideration.
- 1.14 The 2013 Suffolk Coastal District Local Plan Core Strategy and Development Management Policies Development Plan Document contains policies of relevance.
- 1.15 The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate for examination on Friday 29 March 2019. The examination hearings took place between 20 August and 20 September 2019. The new Local Plan

includes Policy SCLP3.5 'Proposals for Major Energy Infrastructure Projects'. This policy identifies the need to mitigate the impacts arising from such developments and will be used to guide East Suffolk Council in due course. This policy has outstanding representations and was discussed with the Inspector and representatives during the examination hearings, so at this stage, the weight which can be attributed to this policy is reduced. The Inspector's Report has been received and minor tweaks to the policy suggested. A main modifications consultation ended in July; the new Local Plan is anticipated to be adopted in September 2020. However, NPSs usually override local planning policy.

- 1.16 Suffolk County Council's Local Transport Plan (LTP2) recognises Lowestoft as a key area focusing on the energy sector for economic recovery but most of its focus is on the key urban areas. However, the transport sector will be reliant on the future development of renewable energy and other low carbon resources to power electric vehicles. The LTP2 also lists Leiston passenger rail service reinstatement as a medium / long term priority.

2 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

- 2.1 The vision for East Suffolk includes maintaining and sustainably improving the quality of life for everyone growing up, living in, working in, and visiting East Suffolk. East Suffolk has a long history of hosting nuclear power stations, and the Council recognises the opportunities for the UK, and more locally, of hosting a next generation nuclear power station alongside offshore wind farms. Also, the Council has been supportive to date in relation to the existing decommissioning Sizewell A nuclear power station, the operating Sizewell B nuclear power station, Galloper, Greater Gabbard, East Anglia 1 and East Anglia 3 offshore windfarms. However, the Council has raised concerns with the proposals for East Anglia One North offshore windfarm and the East Anglia Two offshore windfarm which are both currently at Examination.
- 2.2 Sizewell C proposes approximately 25,000 roles during its construction lifetime and the aim is to have as many of these occupied by home-based employees. There is a skills, employment and education team working closely with EDF Energy/SZC Co. and others, including the New Anglia Local Enterprise Partnership and Suffolk Chamber of Commerce, to ensure that Suffolk people and businesses are optimally placed to take advantage of these opportunities. In addition, there will be 900 jobs permanently based at Sizewell C, once operational. A key area for investment and development is the supply chain required to facilitate and service a construction site and operation of the scale proposed. It is hugely important that the Council encourages supply chain development in East Suffolk to ensure some of the economic benefits of the project can be realised in the district.

3 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 3.1 East Suffolk Council has signed a Letter of Intent with EDF Energy/SZC co. which enables the Council to recover costs in relation to the input from a large number of Officers working in relation to the Sizewell C project across East Suffolk up to the start of the

examination. This enables the Council to fully engage with EDF Energy/SZC Co. on the specific technical details of their project in order to identify and mitigate potential adverse impacts arising from their development proposals. The Council also works collaboratively with Suffolk County Council and other statutory consultees to ensure that we are speaking with one voice, where possible, to emphasise our position in certain areas. The monies paid to this Council by EDF Energy/SZC Co. are reinvested in the service areas and used to backfill posts where necessary. By doing this, the Council aims to avoid the over-use of consultants (where possible) and maintain the knowledge and expertise of the project in-house.

4 OTHER KEY ISSUES

- 4.1 An Equality Impact Assessment (EqIA) was not undertaken as the Council is responding to the planning proposals of EDF Energy/ SZC Co. As such, EDF Energy / SZC Co. is required to satisfy the EqIA requirements.
- 4.2 The draft Relevant Representation has been appended to this report. It is in a draft form as technical officers are continuing to read through the documentation associated in the applications and, therefore, may need to make changes or additions, as appropriate. The discussions at Council also provide an opportunity for Councillors to highlight additional areas of importance to them, arising from their local knowledge, that may not have been incorporated so far.

5 CONSULTATION

- 5.1 At each round of public consultation run by EDF Energy/SZC Co., this Council, jointly with SCC, hosted a meeting for those town and parish councils across East Suffolk which might be affected by the proposals, in order to seek their views on them. This consultation contributed to the Council's joint responses with SCC at each round of public consultation by EDF Energy/SZC Co. Most recently, the Council held a well-attended, virtual meeting following the submission of the DCO application, to seek views on what the Council may wish to consider within their representations to PINS. The Council is not obliged to carry out this consultation by the NSIP process, but chose to do so, to provide support to our town and parish councils, and to learn from them. There are a number of action groups formed in relation to the proposals and the Council has engaged with them, where we have been able to. The Council has also carried out internal consultation with technical officers in areas including economic development, coastal management, landscape, ecology, and environmental protection, the responses from which being combined with the technical detail provided by Suffolk County Council Officers in relation to highways, archaeology, flood risk and drainage, education and skills, Public Health, and Fire and Rescue. All of this demonstrates the Council's full engagement in the pre-application process with EDF Energy/SZC Co.
- 5.2 EDF Energy/SZC Co. continue to engage with Officers on the proposals and there are several documents to be produced over the coming months that will require further collaboration, such as statements of common ground and heads of terms for agreement

to be made under section 106 of the Town and Country Planning Act 1990.

6 PROPOSALS

- 6.1 EDF Energy/SZC Co. is proposing to build a nuclear power station at Sizewell. This would be a very significant development for Suffolk. The investment into and size of Sizewell C would be similar to the London 2012 Olympics, with about £20bn plus investment and an area similar in size to the Olympic Park in East London. The construction site would take up 300ha of land, largely within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) which also contains many European and national ecological designations. It would create 7,900 peak construction jobs plus 600 jobs supporting Associated Development sites. Once in operation, the power station would generate 900 permanent jobs of which 60-70% are suggested to be non-nuclear specific. EDF Energy/SZC Co. expect the development to generate a £100m pa investment boost to the regional economy during construction and £40m pa during operation. The Council seeks to ensure that where possible, most of these potential economic benefits are kept within Suffolk.
- 6.2 EDF Energy/SZC Co. has carried out four rounds of public consultation (with an additional focussed “informal” targeted round of consultation with key stakeholders). Following the Stage 1 consultation, EDF Energy/SZC Co. submitted a request for a Scoping Opinion as required by the Environmental Impact Assessment (EIA) Regulations to the Planning Inspectorate. The Councils were consulted on this submission. A joint response from the Councils was sent to the Planning Inspectorate, dated 22 May 2014, giving our comments and opinion on the submission. This was taken into consideration by the Planning Inspectorate in the formal Scoping Opinion which they published in June 2014. In 2019, EDF Energy/SZC Co. submitted a further Scoping Opinion to the Planning Inspectorate to update the previous Scoping Opinion. This required the development to be considered having regard to the EIA Regulations 2017. The Councils submitted our opinion to the Planning Inspectorate on the 18 June 2019. The Planning Inspectorate published their Scoping Opinion in July 2019 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012-000735-SIZE%20-%20Scoping%20Opinion.pdf>)
- 6.3 In 2010, East Suffolk Council and Suffolk County Council signed a Planning Performance Agreement (PPA) with EDF Energy/SZC Co. This included a joint vision for the project which included:
- a contribution to the national need for secure, low carbon electricity and for the replacement of decommissioning nuclear capacity at the national level in accord with applicable and current Government and Development Plan policies;
 - a significant benefit to the local economy, both during construction and in operation, through local employment opportunities, training and workforce development, expenditure on local facilities and services, and business for the supply chain, and the appropriate publicising of such opportunities;
 - additional/enhanced social and community provisions and/or facilities, where

possible in the form of legacy provisions, to mitigate the impacts of the influx of construction workers and serve the operational workforce;

- a power station design, layout and associated grid infrastructure that avoids undue adverse visual impact on the AONB and Heritage Coast, minimises any such impacts whilst complying with operational, safety and security requirements;
- a positive long-term contribution to local biodiversity, landscape quality and countryside access;
- a development that minimises impacts on coastal processes and is in accordance with the strategies set out in the Suffolk Shoreline Management Plan;
- use of sustainable transport modes wherever practicable and improvements to the transport infrastructure where required to minimise the impact of and improve access to the development and ancillary facilities;
- a secure and safe Project with robust emergency planning provisions, that complies with all operational safety and security requirements and minimises any adverse impacts on health and well-being of the local population during construction and operation; and
- if granted consent, completion of the Project in line with the Developer's objective of having four nuclear generating units operational in the UK by 2025.

The Vision was caveated in that the two Councils confirmed that, in endorsing the Vision, they did not commit themselves to act in any way other than in accordance with their statutory powers and duties.

- 6.4 The Council recognise that Sizewell C has the potential to be an important contribution to the national energy strategy and welcomes the benefits such a development could bring to Suffolk, with regards to jobs and skills. However, to make the development work for Suffolk, it is essential that local impacts are minimised by following the mitigation hierarchy, prioritising sustainable transport modes and by addressing the sensibility of its location and any arising community impacts.
- 6.5 This Council has welcomed the additional rounds of public consultation from EDF Energy/SZC Co., although remain disappointed that the level of detail which the Council has required to address outstanding issues and concerns has not been forthcoming in the public consultations. The Council has had to wait for the DCO submission, and in some instances, information requested is still omitted and we are challenging EDF Energy / SZC Co. to provide additional information, where required, pre-Examination. The Council has worked with EDF Energy/SZC Co. throughout the pre-application and pre-DCO submission process and will continue to work with them as we approach the examination period. It is expected that the Council may be able to reach common ground in some areas and agree potential mitigation and compensation arising from identified impacts, in other areas. East Suffolk Council will continue to work closely with EDF Energy/SZC Co. to seek more detail on aspects of the proposals, including seeking to agree mitigation and levels of compensation packages to be delivered through a S106 agreement. This is considered

especially important as it is acknowledged that many communities have reservations about the proposals, and this is seen as a way of positively addressing concerns by providing detail and clarity on these matters.

- 6.6 East Suffolk Council, along with Suffolk County Council, were asked by PINS to formally comment on EDF Energy/SZC Co.'s consultation and did so on the 9 June 2020 (response available on the PINS web pages for Sizewell C). The Council responded by saying that with regards to the formal elements of the response, EDF Energy/SZC Co. had met the appropriate tests within Sections 42, 47 and 48 of the Planning Act. However, the Council did hope that our repeated requests for additional information would be made available to give full and detailed consideration of the potential impacts. The Council believe that the supply of further information, earlier on, would have benefited the engagement process.
- 6.7 This Councils expectation is that, if approved, the development should create a lasting economic legacy, support and develop local talent, act as an environmental exemplar, make appropriate provision for necessary mitigation measures, and fund wider community benefits to mitigate for residual impacts. The Councils' expectations have been set out over time in a number of Joint Local Authority Group agreed principles papers (<https://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/sizewell-c-ecology-access-design-estate-and-skills-principles/>). **Overall, this Councils approach to Sizewell C is to maximise the positive impacts that development can bring whilst minimising the negative impacts.**
- 6.8 Beyond mitigation and direct compensation, the Council will seek from EDF Energy/SZC Co. recognition of the many intangible and residual impacts a project of this scale causes on the quality of life of local residents. This is expected to be in the form of a Community Impacts Fund similar to that which EDF Energy/SZC Co. provided in relation to the Hinkley Point C development. In addition, given the location of Sizewell C in the AONB, the Council expect a compensation fund in response to the residual environmental impacts of the proposals. The Council will seek to continue to work with local communities and EDF Energy/SZC Co. in order to ensure that a Community Fund meets the recognised and residual impacts of the development on the local community.
- 6.9 The draft Relevant Representation is structured around the following areas which are summarised here:
- Environmental Impacts**
- 6.10 *Noise, vibration, air quality*: our relevant representation contains a number of concerns and seeks clarification from EDF Energy/SZC Co. with regards to various aspects of the project. In particular the Council raises concerns with regards to the proposed overnight movement and unloading of rail and the potential noise and vibration impacts arising from this. We have concerns with regards to the number of HGVs on the roads and the potential for adverse noise impact arising from this.
- 6.11 The Council has yet to receive clarification that impacts of the main construction site on occupants of the accommodation campus and caravan site at Land east of Eastlands Industrial Estate (LEEIE) have been appropriately mitigated for.
- 6.12 From an air quality perspective the Council needs clear understanding of the timing of

construction of associated developments in particular the Two Village Bypass to ensure it is operational at the earliest possible stage of the development in order to take HGVs out of the Air Quality Management Area at Stratford St Andrew.

- 6.13 There needs to be more detail on air quality assessments for non-road mobile machinery, emergency diesel generators, workers accommodation, the combined heat and power plant and for general construction included. Dust management measurements included appear to be satisfactory, but dust deposition monitoring is required when soil stripping is undertaken in close proximity of sensitive receptors.
- 6.14 *Lighting*: there has been limited detail provided to date with regards to lighting. There is potential for lighting from the site to adversely impact with regards to nuisance, ecology, tranquillity and dark skies. The Council needs to ensure appropriate controls and monitoring is in place during construction and operation – this will be required at all associated development and the main construction site.
- 6.15 *Landscape and Visual Impact*: despite embedded mitigation measures and the fact that construction areas – approximately 300 hectares worth, will be reinstated in accordance with agreed ecological and landscape management plans, significant adverse effects will remain for the existing landscape character of the area. Therefore, an appropriately robust compensation fund will be required for the lifetime of the development including decommissioning phase.
- 6.16 Significant adverse effects on visual amenity have been identified for views at: Westleton Walks and Dunwich Heath, RSPB Minsmere, coastal strip between Dunwich, Minsmere Sluice and Beach View holiday park, Eastbridge and Leiston Abbey, Sizewell Belts, Views from Dunwich Heath Coastguard Cottages, views from offshore and effects on the visual amenity of the Suffolk Coast Path and Sandlings Walk.
- 6.17 *Ecology*: the project demonstrates a number of areas where there will be minor adverse, not significant impacts, but it does not appear to consider all of these impacts cumulatively. It is critical that an appropriately robust mitigation, compensation and enhancement fund is secured as part of the DCO to address concerns that cannot be addressed through embedded mitigation. The Council is concerned that there is not the inclusion of a contribution to the Suffolk Coast Recreation Avoidance Mitigation Strategy to ensure the development does not result in an adverse effect on the integrity of any European designated sites. Air quality impacts on habitats needs further detailing.
- 6.18 *Heritage*: The Council understands the rationale set out in the described methodology and we accept that the quality and calibre of the work on built heritage assets has been undertaken to an acceptable standard of good quality, using appropriate references and with a clear rationale.

Flood and Water

- 6.19 *Potable water*: this is a significant ongoing issue for which there are no clear answers in the DCO documents. The Council will need to ensure that the solution proposed does not adversely impact or cause risk to private water supplies in the area.
- 6.20 A number of the potential solutions will involve unassessed construction and unassessed operational plant noise which may have impacts of their own. These will need to be fully considered when the relevant decisions on solution have been made.
- 6.21 *Drainage*: SCC as lead local flood authority supports sustainable drainage systems that are considered to be environmentally beneficial as the priority for drainage solutions. However, sustainable drainage solutions are not always achievable and therefore the Council supports the hierarchy of drainage and the principle aim to avoid risk of flooding

elsewhere.

- 6.22 *Flood Risk Assessment/Coastal Processes:* The Environment Agency are the key flood risk authority and the Council works very closely with them in relation to assessing flood risk from proposals, ESC is the responsible authority with regards to coastal flood risk, and we are closely examining the proposals, in particular, the coastal flood defences that are proposed, to ensure that they will not have an adverse impact on coastal geomorphology, and that any potential impact can be appropriately monitored and mitigated for.

Socio-Economic Impacts

- 6.23 *Communities:* communities in East Suffolk will be impacted directly by the Sizewell C development by virtue of living in close proximity to the main development site and associated development sites, and indirectly by sharing and using the same highway and railway network, local recreational facilities and services affected by the proposal. Once operational the primary impacts of the development on communities will be predominantly in Leiston, during construction impacts will be spread across East Suffolk, adjoining Districts and Boroughs, and the wider County of Suffolk. The Council will seek to minimise impacts on our East Suffolk communities and work closely with partnership agencies to mitigate and minimise wider impacts across Suffolk.
- 6.24 *Community Safety:* there are concerns that the submission does not accurately represent the potential impact on community safety with regards to crime as the extrapolation used is flawed. The Council has concerns regarding the potential impact on local communities through increased tension, potential traffic congestion issues and related community safety issues, anti-social behaviour being a key concern. The Council expect there to be additional funding support for the Police in East Suffolk and a substantial contribution to support and expand existing community work in the most likely affected area (Leiston). The Council welcomes the Workers Code of Conduct and expect good community liaison to be in place during construction in order to be able to address concerns as they arise with the site management.
- 6.25 *Schools Capacity:* the Council appreciates that the number of nursery and school aged children generated in response to the development is unlikely to adversely impact on local school places. However, they could potentially impact on other services such as local health services, and early intervention services and this will need to be considered and funded by the project.
- 6.26 *Public Health / Social Services:* identified impacts arising from the submission can predominantly be managed with the provision of appropriate section 106 funding towards public health services and the identified Clinical Commissioning Groups (CCGs), this must include the Ipswich and East Suffolk CCG and the Gt Yarmouth and Waveney CCG. The Council expects provision to include preventative and reactive measures.
- 6.27 *Emergency Services:* there are concerns with the ability for emergency services to meet their delivery indicators during construction of Sizewell C, this Council supports the emergency services in writing to EDF Energy/SZC Co. direct for requests for service contributions through S106 to try and mitigate some of the impacts. Fire and Rescue comes under SCC, but it is understood they will be writing to EDF Energy/SZC Co. independently. However, the Council supports their representations in relation to the Sizewell C project.
- 6.28 *Accommodation Strategy:* the Council is supportive of the proposal to have an accommodation campus housing 2400 workers adjacent to the main development site, the Council is appreciative that it is no more than 4 storeys high thus reducing its impact

on the setting of Leiston Abbey. The Council expects the campus to be constructed to a high environmental standard and to incorporate environmental exemplar features to minimise its carbon footprint. The Council support the 400-pitch caravan park at Land east of Eastlands Industrial Estate provided it is laid out to meet our specific requirements with regards to space standards, shared facilities etc. However, we need to be reassured that the caravan park will be available prior to work commencing on the main development site and that the accommodation campus will be available, preferably on a phased basis, before peak levels of construction. If there is evidence during the construction phase that the caravan site is not operating at capacity as anticipated, the Council will expect there to be flexibility in the Housing Fund to account for this.

- 6.29 *Housing Fund:* the Council supports the principle of a Housing Fund providing it is robust and flexible to meet the needs of a potentially changing housing market. Contingency payments should be written into the Fund to ensure it can be fluid in its response to the situation on the ground at all times of the construction. An element of the Housing Fund is aimed at mitigating potential impacts on the tourist visitor economy throughout the year – through boosting provision by supporting existing tourist accommodation providers in expanding as one potential solution.
- 6.30 *Skills, education and employment:* an additional workforce of up to 7,900 workers is proposed to support the Sizewell C construction, plus 600 home based workers on associated development sites, the DCO proposes the increase from 5,600 to 7,900 to all be non-home based workers, this would add significant additional pressure to our local housing market. The alternative that the Council is promoting is that we maximise the homebased workforce through an extensive skill and education-based programme so the reliance on a non-home-based workforce is reduced significantly. In order, to achieve this, the Council needs EDF Energy / SZC Co. to invest in a skills and education-based programme now in order to ensure workers will be available with the necessary skillsets once construction commences. Working with SCC and EDF Energy /SZC Co. the Council can ensure this is delivered in a timely manner provided it is appropriately funded.
- 6.31 The submission suggests that the lower paid, lower skilled positions will be filled by very local communities, which may suit some local communities, but working with SCC and EDF Energy/SZC Co. the Council wants to ensure that our local residents have access to the higher paid positions as well throughout the lifetime of the build programme and beyond.
- 6.32 In summary, the DCO is comprehensive with regards to the wider benefits of the proposed development, which the Council can agree will be significant from a national / regional perspective but we are still very light on plans and proposals for securing benefits locally through skills development, education, supply chain, inward investment amongst other potential support areas. The Council is encouraged to see EDF Energy / SZC Co. desire to work with existing initiatives across the County and we can see how these can be enhanced to support the Sizewell C development rather than creating a series of new initiatives for the lifetime of the Sizewell C development. Our aim is to work with EDF Energy / SZC Co. to provide sustainability to existing interventions and create legacy in the local area.
- 6.33 The Sizewell C Jobs Service proposed as part of the DCO has the potential to be highly important in terms of ensuring the local workforce can take advantage of Sizewell C opportunities. However, it could provide a potential conveyor for workers from Hinkley Point C which could limit local opportunities. The Council would want to ensure that it is managed correctly so it can be seen as a positive development to enable a greater

content of local workers across all aspects of the development.

- 6.34 The flexible Asset Skills Enhancement & Capability Fund could be extremely beneficial to our existing college and provider base. It takes strong learning points from Hinkley Point C to avoid the creation of 'white elephants' and again attempts to build on existing strengths to create sustainability and a strong legacy within this sector. The focus within the strategy of a skills strategy not just for the Sizewell C supply chain but supporting the skills need within the economy more generally is welcomed as there are numerous infrastructure / longer term construction projects in Suffolk that will benefit from this legacy.
- 6.35 *Economic Development:* the Council is seeking further evidence from EDF Energy / SZC Co. in relation to potential impacts arising from Brexit, Covid-19, changes during the construction phase with reference to a tight labour market. Our ambition is that the Council maximises opportunities arising from Sizewell C by anticipating in-combination effects with other construction projects and known employment growth across the district, ensuring a robust mitigation strategy is in place with key targets in particular for supply chain, tourism support, inward investment. East Suffolk is at the forefront of new energy production as well as being a centre for ICT (Austral Park) and the ports of Felixstowe and Lowestoft. The Council wants to develop partnerships with all these business sectors for their mutual benefit to maximise the opportunity and use this to promote further investment in necessary services and infrastructure. The Council wants to maximise the local benefits from the project as the negative impacts are anticipated to be very local in effect whilst benefits more likely to be regional and national in their focus.
- 6.36 *Tourism:* it is anticipated and proven through surveys by the Suffolk Coast Destination Management Organisation and EDF Energy that there is a negative perception impact on willingness to visit Suffolk if the Sizewell C development goes ahead. In order to address this, a Tourism Fund is proposed, the Council expects this to be robust and appropriately governed to ensure it meets the need to mitigate adverse impacts arising from the Sizewell C construction. EDF Energy / SZC Co. are proposing a Visitor Centre, joint with Sizewell B, as part of their proposals, the Council supports provision of this as a positive visitor destination initiative in East Suffolk.

Transport Strategy Impacts

- 6.37 *Transport Strategy:* it is important to ensure that the transport strategy for construction of Sizewell C is as sustainable as possible and that the potential impacts of the development on transport networks is proactively addressed. Although this Council would have preferred greater use of rail in the strategy, we accept that a jetty on the coast at Sizewell would not have been appropriate. As such, this Council is content with the use of the beach landing facility as proposed subject to further detail with regard to beach closures during operation, accessibility to the beach, and timings of operation of the beach landing facility.
- 6.38 *Rail:* the NPS states that water-borne or rail transport is preferred over road transport where cost-effective, the Council would add that this should also advocate where achievable as well. The Council has promoted greater use of rail throughout all stages of pre-application consideration of Sizewell C and is disappointed that the DCO proposes only 3 two-way rail paths a day, five movements of which will be overnight. This brings with it concerns in relation to noise and vibration for residents in close proximity to the rail line during operation and for noise implications with regard to unloading of trains

overnight at Land east of Eastlands Industrial Estate.

- 6.39 *Integrated Strategy:* the proposed integrated strategy is a combination of HGVs and rail transport, on a busiest day during peak construction this equates to 1000HGVs a day, on an average day during peak construction this would be 750 HGVs a day. To mitigate the adverse impact this large number of HGVs (along with significant numbers of LGV and cars) will have on the highway network, EDF Energy / SZC co. is proposing a number of new roads as well as improvements across the highway network. The key transport infrastructure proposals are a two village bypass of Stratford St Andrew and Farnham of the A12, a Sizewell link road from the A12 south of Yoxford direct to the new roundabout at the main site access on the B1122, and a new roundabout at Yoxford joining the B1122. The Council has always been supportive of a bypass for Stratford St Andrew and Farnham, we would have preferred a full four village bypass but funding from government for this was not forthcoming so the Council is satisfied that the two village bypass proposed by EDF Energy/SZC Co. will address the priority concern with regards to the existing Air Quality Management Area at Stratford St Andrew and the pinch point on the network at Farnham.
- 6.40 The Sizewell link road, follows a direct line from the A12 to the new site entrance effectively bypassing Middleton and Theberton villages, having long advocated an alternative route to the B1122 for HGV access to Sizewell the Council is supportive of the Sizewell link road as an alternative route for HGV traffic to the C Station. This will also become the primary HGV and Abnormal Indivisible Load (AIL) route for the existing A and B stations taking additional traffic from the B1122. This Council supports the permanent retention of this road and promote the aspiration for Sizewell C to provide funding and investment for the B1122 to be downgraded in status and capacity and for it to become a cycle friendly route from Darsham Station/A12 in to the AONB/Heritage Coast as a further boost to the tourism offer.
- 6.41 The use of a large number of HGVs brings concerns with regards to the potential for early morning and late at night HGV movements on the local network, there are a large number of residential properties in close proximity to the highways that will be used by HGVs, outside of usual 8am – 6pm these roads are very quiet, HGVs outside of these hours could have a significant impact and the Council needs further detail to ensure that this can be appropriately avoided or mitigated. SCC as Highway Authority are responsible for traffic related noise but have yet to carry out an assessment in this area. Further detail is required on this from them. Further detail on AIL movements is required as this could have a significant impact on local roads particularly during the early years of construction, prior to the new roads and bypasses being completed.
- 6.42 Sizewell C is just one major project potentially being delivered in East Suffolk. With the planned growth in the two Local Plans, the growth of the offshore wind sector and a growing economy, including the Port of Felixstowe, it is essential that the promoters, Highways England and Suffolk County Council work collaboratively to coordinate the necessary investments in roads at the right time and have the necessary communication in place to make it clear East Suffolk is open for business and tourists.
- 6.43 *Air quality:* emissions from train engine idling has been represented but further information is required to agree that a reasonably conservative estimate has been undertaken. Detailed air quality assessments in relation to transport have been provided, and there are some requests for clarification within the detailed submission. Further detail is requested with regards to potential impacts arising from car parks and human

health receptors. The Council expects all car park facilities including park and ride sites to have facilities for electric car parking to be provided. Air quality monitoring will be required at agreed locations during the works in order to confirm modelled pollutant concentrations.

Site Specific Impacts:

Main Development Site

- 6.44 *Coastal Geomorphology:* the proposed development is located on a relatively stable length of the Suffolk Coast which is subject to constant and variable change from the action of waves, currents and storms. Sea level rise and climate change are likely to alter that pace and nature of previous coastal trends, it is not possible to predict future changes with certainty. The management policy for this coastline is to allow natural change to prevail with a caveat that protection of the power station sites is a necessary Line to be defended. The Council's policy objective is to ensure that the development complies with this policy intent and that any potential disruption to natural change that is attributable to the development is avoided or mitigated and that the development is fully removed at life expiry.
- 6.45 *Proposed works impacts:* the Sizewell C platform is estimated to extend further seaward than the building line of the A and B stations, the sea defence (Hard and Soft Coastal Defence Features – HCDF / SCDF) is likely to have a significant and enduring negative effect when the HCDF is exposed by a naturally retreating shoreline, however the Council does not have a final design for the HCDF which is a concern. The beach landing facility is proposed to be used during construction and operation – approximately once every ten years during operation, this has the potential to alter natural change trends in its locality and beyond. The risk of this is higher during construction as barge deliveries requiring dredging to create navigational access could have impact. The Council's Coastal Partnership East team have carefully assessed the evidence to date, and it is indicated that a potential positive impact is accretion to the Minsmere frontage which could benefit RSPB Minsmere in the shorter term. This will need further assessment and consideration ahead of the Examination.
- 6.46 *Marine Monitoring and Mitigation Plan (MMP):* this Council agreed several years ago with EDF Energy / Sizewell Co. that a monitoring and mitigation plan for the shoreline would be required, a draft has now been produced by SZC Co. and is currently under consideration by ESC, the Marine Management Organisation, the Environment Agency and Natural England. The Council seeks to ensure that the life of the MMP correlates to the lifetime of the station not just the operational lifetime, we are seeking this through a legal obligation through the DCO process. The MMP will need to be a robust document with agreed procedures for determining outcomes and have the necessary funding in place to address negative impacts.
- 6.47 *Heritage:* there are a number of heritage assets adversely impacted by the construction and main development, the majority of these can be mitigated and a mitigation package is proposed as part of the DCO. However, some of the harm requires additional mitigation which is not included and needs to be added to the DCO proposals. Harm in relation to Leiston Abbey will be addressed formally by Historic England.
- 6.48 *Design:* from a design perspective, mindful that large elements of the permanent build are restricted by the Generic Design Assessment for new nuclear power stations and the Council cannot influence their appearance, this includes the reactor domes which will be one of the prominent buildings on the site. However, buildings the Council can influence the external appearance of include the turbine halls, operational service centre, and the

interim dry fuel store building. EDF Energy / SZC Co. have included design and access statements with their DCO and design principles for the main development site and for associated developments. The Council has some minor concerns with regard to layout and potential suggestions of alternatives but in general the design principles and materials where included are supported by this Council and we are satisfied that with the right requirements, particular details can be resolved post-consent should it be granted.

- 6.49 *Accommodation Campus:* the principle of the accommodation campus as a key element of the overall accommodation strategy has been previously stated. The design of the accommodation campus on the western edge of the main construction site will be critical with regards to its ability to be the first element that visitors and passers-by will see adjacent the main roundabout access to the site. It has the potential to form a softening edge to the construction site beyond and the Council expect that to be maximised through its design and appearance. In addition, the Council expects the campus to be as environmentally friendly as possible in a temporary building, we expect the re-use of greywater throughout the campus, the use of low levels of lighting to minimise impact on wildlife and ecology and where possible landscaping, preferably landscaping that can be retained longer term post campus. ESC would wish to work closely with EDF Energy/SZC Co. in developing the design to ensure it is of the highest environmental credentials.
- 6.50 *Permanent structures at Upper Abbey Farmhouse:* there are permanent structures proposed in the setting of Upper Abbey Farmhouse and along with the temporary campus these will lead to adverse impacts, the campus impacts will be of a transient nature (but still significant). However, the permanent buildings in relation to Upper Abbey Farmhouse are sustainable as it forms part of the wider EDF Energy estate.
- 6.51 *Pylons:* since their more recent rounds of public consultation EDF Energy / SZC Co. have been advocating an overhead line (OHL) solution which equates to four new pylons, to export power from the turbine halls to the National Grid substation on the Sizewell C site. ESC had supported an undergrounding solution and the Council is disappointed at the current proposal for an OHL solution which requires four new pylons in the AONB. EDF Energy / SZC Co. have put forward the case for OHL on the basis that the footprint of the site is not big enough to accommodate the galleries and tunnelling that would be required to underground the lines. Pursuing undergrounding of the lines would require unacceptable works in close proximity to the Sizewell B site and enlargement of the platform to the north leading to further loss of land within the Sizewell Marshes SSSI. This would not be acceptable to this Council.
- 6.52 ESC is disappointed that an alternative solution to OHL has not been found to be deliverable without adversely impacting on the SSSI or safety with regards to Sizewell B, however, the Council would support further work in this area and the potential for removal of the pylons should an alternative solution present itself as available. However, the Council would not support further encroachment into the SSSI, nor would the Council support any option that involved further encroachment onto the Sizewell beach (eastwards). Increasing the platform eastwards would push the proposed HCDF (sea defences) towards the sea which would adversely affect existing predictions and monitoring and potentially result in the HCDF becoming exposed earlier than currently predicted.
- 6.53 ESC reluctantly accepts that the SZC Co. solution of four pylons, two at 48 metres and 2 at 65 metres would be the least worst option, however, this will adversely impact on the landscape and therefore the Council expects appropriate compensation within the

proposed AONB Fund to compensate this approach.

- 6.54 *Landscape and Visual Impact Assessment:* During the construction phase there will be significant adverse effects on landscape and seascape character within the AONB and significant adverse effects on visual amenity during construction from several viewpoints. The Council also anticipates night-time effects during the construction period to be major or major-moderate across a wide range of landscape, seascape and visual receptors.
- 6.55 These impacts cannot be mitigated for by the project and therefore they will need to be compensated for. An AONB Fund is proposed but it is not considered that this goes far enough in addressing potential off-site mitigation measures which could be achieved outside of the AONB, as such the Council expects further detailed discussion with EDF Energy / SZC Co. with regards to a Natural Environment Fund to cover impacts arising from LVIA as well as other areas.
- 6.56 *Ecology:* the Council has concerns that the proposed mitigation and compensation measures proposed in the DCO to off-set impacts on the Sizewell Marshes SSSI may not deliver to the standard required. We need further understanding of the financial contribution to be made should the compensatory habitat not deliver and the mechanism for monitoring and assessing this. There are a number of concerns with regards to Sizewell Levels County Wildlife Site, Suffolk Shingle Beaches County Wildlife Site, bats, water voles, reptile and natterjack toads. These are all discussed in further detail in our full Relevant Representation.
- 6.57 *Air Quality:* there are a number of areas of concern with regard to air quality and the main construction site from non-road mobile machinery, the combined heat and power plant, impacts on occupants of the accommodation campus, dust mitigation provision. There are a number of specific queries to be addressed but mitigation is able to be provided through a requirement or detailed in the Code of Construction Practice. However, monitoring will be required to ensure that the mitigation is doing what it is supposed to.
- 6.58 *Drainage:* further detail in relation to drainage is requested to be provided, it is considered that there is an acceptable drainage strategy available for the main development site but the detail needs to be assessed and where possible it needs to be a sustainable solution preferably with some legacy benefit in this dry part of the District.
- 6.59 *Sizewell B Relocated Facilities:* This Council notes that the plans submitted for the relocation of facilities at Sizewell B are the same as those previously consented by ESC under DC/19/1637/FUL, however, a pedestrian route from the outage car park in Pillbox Field through the SSSI was removed from that application but is still shown in relation to the DCO, the Council cannot support this element of the proposals.
- 6.60 The Council is also aware that given the proposals are to be considered together at this stage we would welcome any opportunities to reduce greenfield development within the AONB for the DCO, the Council would suggest that this could be achieved by a shared outage car park or shared training centre. The Council would ask that any opportunity to reduce development in the AONB be taken by EDF Energy / SZC Co.

Land east of Eastlands Industrial Estate (LEEIE)

- 6.61 The principle of using the site known as land east of Eastlands Industrial Estate for an extension of the main development site particularly in the Early Years of construction is acceptable to this Council. However, the Council expects the caravan park element to be kept separate from the remainder of the site and potential impacts with regard to noise,

dust, air quality, vibration, on occupiers of the caravan site to be addressed and mitigated for. The Council expects there to be an appropriate shuttle service between the LEEIE and the main site and this should be supplemented by a safe walking / running route as well as a cycle hire facility between the facilities at the campus and the caravan site. It is also expected that occupiers of the caravan site will be able to use sports facilities at the campus and at Leiston Sports and Leisure Centre and easy access to these with a drop-off via Leiston town should be provided. This will encourage less use of private cars and encourage spending within Leiston town centre by workers.

- 6.62 There are some specific drainage concerns with the LEEIE that will be needed to be addressed with the priority to be finding and facilitating a sustainable drainage system.
- 6.63 The LEEIE is proposed as an early years park and ride site so the Council needs further detail on how this will operate including the route buses will take, the aim being to minimise buses through the residential centre of Leiston.
- 6.64 The LEEIE is the rail head and sidings for the Early Years of the construction, this includes trains overnight – two a day anticipated. The Council needs to seek assurance that this will not result in adverse noise and vibration to residential properties on the Leiston branch line rail route and living in close proximity to the LEEIE. It is likely that a monitoring plan will be required in relation to this.

Sizewell Link Road / Yoxford Roundabout

- 6.65 The principle of a new roundabout at the junction of the existing B1122 and the A12 at Yoxford is acceptable, this will enable HGVs and Abnormal Indivisible Loads from the north of the District to access the B1122 without going through the centre of Yoxford. There is then a slip road from the B1122, past Middleton Moor, dropping down to the Sizewell Link Road, which is proposed from the A12, south of Yoxford, direct to the main site new roundabout access. This arrangement will take all HGV movements out of the centre of Yoxford which will be a benefit. The Council does not consider there to be any value in removing the Sizewell Link Road post-construction, this would then require the B1122 to revert back to being the HGV route to the nuclear power stations which would harm potential opportunities for converting this to a rural route suitable for cyclists and ramblers, and as a tourism offer. As such, subject to an appropriate package of mitigation for properties sited along the route, this Council supports the Sizewell Link Road as a permanent addition.
- 6.66 *Design:* there are some issues with the layout of the Sizewell Link Road and potential adverse impact on settings and views from existing properties. However, the Council recognises the benefits that the Sizewell Link Road can bring by becoming the dedicated HGV and AIL route to service not only the new C Station but the existing Sizewell A and Sizewell B stations. It will also provide an alternative route to east Leiston.
- 6.67 *Heritage:* there are a number of listed buildings whose principal elevations face towards the area or areas of proposed development and these must be considered as the surrounding landscape makes an important contribution to the setting of these heritage assets. Effects of the new road are judged to be moderate adverse and significant, however, it is to be balanced with the beneficial effects to some heritage assets arising from displacement of some traffic from the B1122 onto the new road. Some mitigation needs to be increased in some areas.
- 6.68 *LVIA:* although generally acceptable there are a few areas where additional clarification is required, particularly in relation to very localised effects which will create permanent change for example the setting of Cockfield Hall and the Theberton Hall former parkland

area.

- 6.69 *Ecology*: there is concern that this road cuts across the area cited as being preferable to bats foraging than the main development site, this could have an adverse impact on bat populations in the area and the Council is looking further into this element.
- 6.70 *Air Quality*: no exceedance of air quality objectives has been reported within this area.
- 6.71 *Drainage*: Sizewell Link Road - from the submission there is no certainty that there is sufficient space within the red line boundary for sustainable drainage systems and any flood relief basins. There has been no infiltration testing in relation to the route and no sensitivity testing for discharging to open watercourses without increase in downstream flood risk. It is not clear what pollution treatment is required to treat surface water flows along the route. The Council needs to see further evidence that sufficient space has been provided to ensure drainage basins can comply with current guidance. Yoxford Roundabout – the Council is concerned that the only proposal is for surface water to be piped to the infiltration basin, there is no secondary proposal, we need to be sure that the invert of the basin is enough to accept water from the roundabout.

Two-Village Bypass

- 6.72 The Council supports the two-village bypass and recognises the benefit of the new road for Stratford St Andrew and Farnham and in relation to air quality improvements.
- 6.73 *Design*: the Council acknowledges that there will be occupiers of properties close to the new route of the A12 that will be adversely impacted and we seek appropriate mitigation to address issues arising from predominantly noise and opportunities for additional landscape screening to nearest properties.
- 6.74 *Heritage*: the impact on heritage assets is considered to be minimal by year 15 the impact will be low due to the screening maturity. The Council has a concern that the Grade II Listed Hill Farmhouse is not included in assessment submitted with the DCO. This Council also disagrees with SZC Co. assessment that the Two-Village Bypass will have no effect on Farnham Hall – the proposed bypass has no regard for historic field pattern/boundaries which will be eroded, it will detract from rural character, the additional traffic will harm tranquil setting, and screen planting will accentuate the adverse effects, and create severance of Foxburrow Wood. However, by taking the A12 out of Stratford St Andrew and Farnham there is a benefit in restoring the village setting in more tranquil surroundings. The road will have an adverse impact on the setting of the registered parkland at Little Glemham Hall which needs to be addressed and mitigated for.
- 6.75 *LVIA*: mitigation embedded in the design seeks to minimise loss of trees and hedgerows but during construction there will be significant adverse impacts on some local visual receptor groups because of construction activity and height of plant above existing vegetation. During operation it is considered there will be no significant impact on the landscape as new planting matures to screen views of rising road and bridges. However, significant effects will remain at night for receptors at either end of the road resulting from lighting of the two roundabouts.
- 6.76 *Ecology*: at its closest point there is only a 15m buffer between the two-village bypass and Foxburrow Wood, there could be an impact on the wood during construction. New woodland planting is unlikely to be functional ten years after planting, it will take longer than this. Replacement hedgerow is unlikely to provide the same connectivity as is currently present in the landscape. Compensation for loss of floodplain grazing marsh is

required.

- 6.77 *Air Quality*: the two-village bypass is supported from an air quality perspective as once it is operational it will take a large proportion of vehicles from the Stratford St Andrew AQMA which will be beneficial. In the Early Years the Council needs to understand potential impacts on the AQMA from increased vehicles.
- 6.78 *Drainage*: further detail with regard to the potential for sustainable drainage in this location is required.

Northern Park and Ride

- 6.79 The Council supports the principle of the northern park and ride in this location and we support removal of the roundabout access post-construction as not being of benefit from a legacy perspective.
- 6.80 *Heritage*: there are no significant operational effects on heritage assets. However, there will be temporary impacts of increased traffic around the northern park and ride, but this is only minor.
- 6.81 *LVIA*: during construction there will be significant adverse visual effects for users of the cycle way along Willow Marsh Lane, Main Road, minor roads and local residents to North and East of the site. During operation there will be no significant effects.
- 6.82 *Ecology*: the potentially significant impacts on ecology are being underplayed across associated development sites and mitigation and compensation for the loss and severance of habitat must be more thoroughly considered.
- 6.83 *Air Quality*: there is potential for large dust emission from earthworks at this site which will need mitigation. Buses associated with Sizewell C should be zero-emission or ultra-low emission bus technology.
- 6.84 *Drainage*: it appears that there will be space for a sustainable drainage solution in this location which the Council welcomes.

Southern Park and Ride

- 6.85 The Council supports the principle of the southern park and ride in this location and the access to and from. There are identified potential adverse impacts for Wickham Market resulting from workers accessing the park and ride by driving through the town. There are ongoing discussions with the Council, SCC as Highway Authority and Wickham Market Town Council with EDF Energy / SZC Co. to agree a costed formal mitigation package for the town.
- 6.86 *Heritage*: no significant operational effects on assets including Wickham Market and Marlesford Conservation areas.
- 6.87 *LVIA*: no significant effects on landscape character during construction partly through use of construction best practice, and minimised loss of trees and hedgerows. During operation effects will be more perceptible within the site and adjacent fields but no significant effects anticipated on landscape character.
- 6.88 *Ecology*: the potentially significant impacts on ecology are being underplayed across associated development sites and mitigation and compensation for the loss and severance of habitat must be more thoroughly considered.
- 6.89 *Air Quality*: there is potential for large dust emission from earthworks at this site which will need mitigation. Buses associated with Sizewell C should be zero-emission or ultra-low emission bus technology.
- 6.90 *Drainage*: there are concerns that space within the site has not been provided for sustainable

drainage and that there is no evidence that infiltration is suitable for this site.

Freight Management Facility

- 6.91 The Council supports the principle of a freight management facility, although we have some reservations with regards to its location adjacent the Seven Hills junction of the A14 with the A12 – the Council considers there to be potential issues with additional HGVs on this roundabout particularly at peak times. However, we will take advice from Highways England and the Highway Authority with regards to the capacity of this junction.
- 6.92 *Heritage:* although Decoy Cottages, Nacton, fall within the 1km study area, their setting is not impacted by the site.
- 6.93 *LVIA:* no significant effects during construction phase, significant visual effects are recorded for visual receptors – footpath users and local residents.
- 6.94 *Ecology:* the potentially significant impacts on ecology are being underplayed across associated development sites and mitigation and compensation for the loss and severance of habitat must be more thoroughly considered.
- Air Quality:* The freight management centre is located close to junction 58. An air quality assessment of the freight management facility has been provided. No exceedances of air quality objectives have been reported within this area. A dust nuisance impacts assessment has been provided for the freight management facility and the code of construction practice measures are considered acceptable.
- 6.95 *Drainage:* there is not enough space for sustainable drainage as attenuation crates under bunds are being proposed. Further design detail and testing is required.

Green Rail Route

- 6.96 The Council supports the principle of the Green Rail Route accessed from the Leiston Branch Line and going cross-country direct to the site. The Council has some reservations with regards to night-time rail movements that have been identified elsewhere and we will be looking for mitigation in relation to that. However, the principle of a new rail route straight into the construction site is supported. The delivery of the new rail route is a key priority.
- 6.97 *Heritage:* there will be significant adverse effect on the Leiston Abbey group from the construction of the rail extensions. Although temporary it will be there for the medium-term and this should be taken into account.
- 6.98 *LVIA:* during construction there will be no significant effects, but significant visual effects are recorded for footpath users during the operational phase and reinstatement phase.
- 6.99 *Ecology:* the potentially significant impacts on ecology are being underplayed across associated development sites and mitigation and compensation for the loss and severance of habitat must be more thoroughly considered.
- 6.100 *Air Quality:* measures within the DCO to deal with construction dust are appropriate.
- 6.101 *Drainage:* concerns with drainage for the rail line and its interaction with the surface water flow path. Further detail required, particularly on interaction with existing ordinary watercourses.

Leiston

- 6.102 Leiston as the host town will have several specific local impacts that should be addressed by EDF Energy / SZC Co. The Council is working closely with Leiston-cum-Sizewell Town Council (LTC), SCC and EDF Energy / SZC Co. to promote a mutually acceptable range of mitigation measures that include highway improvements but will not be limited to highway

improvements. LTC are currently formulating their own Relevant Representation and the Council has asked that they provide details to us so we can incorporate their concerns within this response. The expectation is that we will have that further detail prior to final consideration of the Relevant Representation by Cabinet on 21 September.

Ipswich Borough

- 6.103 The Council has expectations that a number of concerns relating to the Sizewell C project will have a similar impact on Ipswich Borough, largely in relation to potential impacts on housing supply and highway concerns. Highway concerns will be picked up by SCC as Highway Authority for the County, we are waiting to hear from IBC if they wish to contribute to our submission and the future Local Impact report on areas of mutual concern.

Mid Suffolk District

- 6.104 The Council has expectations that primarily highway concerns are likely to arise in relation to Mid Suffolk District Council boundary, as such SCC as Highway Authority will pick up on the majority of these. However, we have extended the invitation to Mid Suffolk District Council to contribute to our submission if they choose to do so, a response is currently awaited.

Combined Impacts on Communities

- 6.105 There may be in-combination effects on the labour market arising from other energy projects in the vicinity in the same timeframe – ScottishPower Renewables East Anglia One North and East Anglia Two as an example. These may have a cumulative impact on workforce and accommodation availability / pressures which also must be seen alongside other planned growth.

Cumulative Effects

- 6.106 *Heritage:* the scheduled monument at Leiston Abbey first site and historic landscape character are the only heritage assets scoped in for assessment of potential impacts from cumulative effects.
- 6.107 *LVIA:* effects at a project wide scale compared with effects arising from individual project components are no greater in respect of landscape and visual matters. It is recorded that cumulative effects on historic resources are significant when the project is taken as a whole. This matter needs further review.
- 6.108 *Other projects:* the cumulated impacts with regards to other projects that may be under construction at the same time as Sizewell C is being considered, this includes the Lake Lothing Third Crossing, the Lowestoft Flood Barrier, Brightwell Lakes, East Anglia One North, Two and Three, and potential other major developments including SCC improvements to the A12, are being considered. In particular, from a transport, air quality, economic development, supply chain and construction worker availability perspective.

Monitoring, Mitigation and Compensation

- 6.109 A programme of monitoring, mitigation, and compensation is being developed with regards to the Sizewell C proposals. This covers the majority of the areas summarised above but specifically: ecology, air quality, transport, communities, skills, education and employment, public health / social services, and coastal geomorphology.

7 REASON FOR RECOMMENDATION

- 7.1 The draft Relevant Representation summarises the Council's current position based on the initial reading and assessment of DCO documents. It is still being refined by technical officers and the Council welcomes the opportunity for input, in particular, with regards to specific

communities, that can often only be gained from speaking to representatives of those communities. There will be further opportunities to engage in the process ahead of and during the Examination.

- 7.2 East Suffolk Council as the host Authority for the Sizewell C development and all of its associated development have been working hard on assessing the proposal and will continue to so with EDF Energy / SZC Co. and all stakeholders. The Council is not the decision-making Authority in relation to this proposal and we have to positively prepare for the scheme possibly being consented by government. As such, it is critical that the Council maximises the benefits in relation to the project and minimise the adverse impacts through robustly challenging the proposal where we can and seeking maximum mitigation and compensation where we cannot.

RECOMMENDATIONS

1. That Council endorses and supports the Deputy Leader and Cabinet Member for Economic Development in conjunction with the Head of Planning and Coastal Management, in seeking delegated authority from Cabinet at its meeting on the 21 September 2020 in order to:
 - I. Be able to respond promptly to requests for information and documents during the Development Consent Order process for the Sizewell C proposal including representing the Council/authorising technical officers to represent the Council at Hearings; and
 - II. Be authorised to deal with post consent discharging of requirements and monitoring and mitigation (Section 106).
2. That Council recommends that the draft Relevant Representation be;
 - i) endorsed as a work in progress
 - ii) considered by the Deputy Leader Cabinet Member for Economic Development and the Head of Planning and Coastal Management, along with any updates/revisions to the said document, as detailed in the discussions at the meeting,
 - iii) reported for consideration by Cabinet on the 21 September 2020, along with the updates/revisions and discussions at the meeting, when it agrees the formal Relevant Representation submission.

BACKGROUND PAPERS

Please note that copies of background papers have not been published on the Council's website www.eastsuffolk.gov.uk but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.

Type	Available From
Development Consent Order Documents	https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/?ipcsection=docs
Pre-app Consultation Responses	https://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/
Adequacy of Consultation Response	https://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/development-consent-order/