## **Unconfirmed**



Minutes of the Special Cabinet Meeting held in the Deben Conference Room, East Suffolk House, Riduna Park, Melton on Monday 11 March 2019 at 6.30 pm

## Members of Cabinet present:

R Herring (Leader), G Holdcroft (Deputy Leader), A Fryatt, S Gallant, T-J Haworth-Culf, S Lawson, C Poulter, A Smith.

## Other Members present:

S Harvey.

## Officers present:

S Baker (Chief Executive), L Chandler (Energy Projects Manager), K Cook (Democratic Services and Cabinet Business Manager), N (Khan (Strategic Director), Naomi Goold (Senior Energy Projects Manager), P Ridley (Head of Planning and Coastal Management), S Taylor (Chief Finance Officer and Section 151 Officer).

## 1. Apologies for Absence

Apologies for absence were received from Councillor R Kerry.

#### 2. Declarations of Interest

There were no declarations of interest.

#### 3. Announcements

The Leader announced that the agenda would be re-ordered to bring forward agenda item 7, Decision to Write Off Non-Domestic Rates. This agenda item would be considered following consideration of the Sizewell C Task Group Minutes.

## 4. Task Group Minutes

It was proposed, seconded and unanimously

#### **RESOLVED**

That the Minutes of the Sizewell C Task Group Meeting held on 12 February 2019 be received.

### 7. Decision to Write off Non-Domestic Rates

Cabinet received report **CAB 24/19** by the Cabinet Member with responsibility for Resources which stated that one non domestic ratepayer within the District had outstanding business rates liabilities of £61,341.05 issued. Since the liability orders were issued the ratepayer had been found to have vacated the property on 31 January 2017 and had gone into liquidation on 19 May 2017, and therefore further recovery action could not be undertaken and the only action left for the Council was to write off the debt. Cabinet was advised that under the Council's Financial Procedure Rules individual sums to be written off that exceeded £50,000 required the approval of the Cabinet.

It was proposed, seconded and unanimously

#### **RESOLVED**

That the outstanding non-domestic rates debt of £61,341.05 be written off.

# 5. East Anglia One North and East Anglia Two Offshore Windfarms Phased 4 Consultation from Scottish Power Renewables

Prior to the presentation of his report, the Deputy Leader and Cabinet Member with responsibility for Economic Development, Councillor Holdcroft, paid tribute to all those who had supported him over the last eight years. Councillor Holdcroft gave thanks to the Head of Planning and Coastal Management, and his team; to the Joint Local Authorities Group (JLAG); and to Suffolk County Council (SCC) colleagues, both members and officers.

Cabinet received report **CAB 22/19** by Councillor Holdcroft who reported that Scottish Power Renewables (SPR) was proposing to construct two offshore wind farm projects; East Anglia One North (EA1N) and East Anglia Two (EA2). The wind turbines would be constructed off the Suffolk coast with cables making landfall north of Thorpeness and running underground for 9km terminating at a site immediately north of Friston village where the onshore substations were to be located. This Phase 4 public consultation was the last stage of the consultation proposed prior to the submission of both projects under the Nationally Significant Infrastructure Project regime proposed for Quarter 4 2019.

At the previous phase of consultation Suffolk Coastal District Council (SCDC) submitted a joint response with SCC not supporting Friston as the preferred substation location and offered greater support for the use of EDF Energy land at Broom Covert, Sizewell for the onshore infrastructure.

The current consultation provided a significant amount of Preliminary Environmental Information. The documents were continuing to be assessed by technical experts within both councils. Due to the recent publication of the consultation material and the limited timeframe for the consultation (six weeks), the report before Cabinet had been drafted with limited input from the technical experts at this stage, although their feedback would be fully incorporated into the councils' final EA1N and EA2 responses.

The report had been drafted setting out the key high level comments coming out of each of the topic areas, highlighting the main concerns the councils had in relation to the projects. The recommendation at the end of the report was that the Council objected to EA2 in relation to the significant effects predicted by SPR on seascape, coastal landscapes, character and qualities of the AONB, users of the Suffolk Coast Path and cumulatively with EA1N. It was also recommended that

the Council object to the overall impact of the onshore substations of EA1N and EA2 individually and cumulatively on the village and environs of Friston, including adverse impacts on archaeological and heritage assets, landscape character, visual effects, noise and residential amenity. It was recommended that the Council also identified concerns in relation to the loss of good quality agricultural land and the impact of the cable route works on the setting of Aldringham Court (Grade II listed) in addition to setting out the areas where further information was necessary.

Councillor Holdcroft, at this point, gave a presentation; he stated that the EA2 assessment identified significant effects on seascape; coastal landscapes; the character and special qualities of the AONB (landscape quality and scenic quality); coastal receptors and settlements visually; users of the Suffolk / England Coast Path; and cumulatively.

Councillor Holdcroft, turning to EA1N, stated that the assessment identified significant effects on the settlement of Kessingland and cumulatively with EA2 as previously identified.

Referring to substation location, Councillor Holdcroft stated that the landscape and visual impact assessment identified significant effects on the residents of Friston; specific viewpoints and landscape character. The location was surrounded by above and below ground heritage assets. There would also be noise impacts.

Finally, Councillor Holdcroft stated that he did acknowledge and recognise, and support the principle of offshore wind; he acknowledged that jobs would be created during the construction phase; however, at this point, his concern was for the residents of the District.

Following a question from the Cabinet Member with responsibility for Planning, who asked if there was any recognition by Government of the cost and damage, Councillor Holdcroft referred to meetings that had taken place with the Minister of State for the Department for Business, Energy and Industrial Strategy, raising those concerns; there must, he said, be a strategic view at Government and lobbying would continue.

The Cabinet Member with responsibility for Customers, Communities and Leisure gave thanks to all members of the public who had responded to the consultation; she stated that she had been approached by many members of the public and she highlighted, for Cabinet, some of the concerns raised.

Councillor Haworth-Culf suggested that it would have been beneficial, for members of the public wishing to respond, for feedback forms to have been provided by SPR; this would have made responding simpler.

Councillor Haworth-Culf stated that the communications from SPR, especially early on, had not been effective; people were concerned regarding tourism in the area; Aldeburgh depended on visitors coming to the town; there would be a huge impact on the surrounding villages; the amount of traffic was of concern; SPR had failed to supply detail; and further projects may follow.

In conclusion, Councillor Haworth-Culf requested that Cabinet Members be provided with the final response, in draft, prior to it being sent.

The Cabinet Member with responsibility for Coastal Management questioned the strength of objection in respect of seascape; he felt that this was not justified. He also questioned the impact on tourism, suggesting that this would not be the case. Councillor Smith, in conclusion, felt that the quality of life of residents would not be affected and he said that the turbines would only be visible in the far distance.

The Leader reminded Cabinet Members that the Deputy Leader and Cabinet Member with responsibility for Economic Development, through his report, was asking Cabinet to continue to support the principle of offshore wind as a significant contributor to the reduction in carbon emissions and for the economic opportunities that it may bring to ports in the NALEP geography that could support the construction and maintenance of the windfarms. Councillor Herring stated that there would always be some disadvantages, and it would always be impossible to mitigate the whole impact, but he stated the importance of protecting the quality tourism offer in this part of the District. The Leader asked, to what extent, could mitigation be provided in respect of seascape. The Head of Planning and Coastal Management responded, stating that according to the assessments, the mitigation of visual impacts was dependent on the effective and timely delivery of mitigation planting. No more than an initial outline scheme of mitigation had been presented to date. Furthermore, the congested nature of the site, with the potentially competing interests of visual amenity, historic landscape / assets and the need for SuDS suggested that delivering an effective scheme of mitigation would be extremely challenging and may not be possible. The Head of Planning and Coastal Management advised Cabinet that turbines could be 300 metres high; he also stated that SPR itself had acknowledged the significant impact. The Leader, in response to this, commented that it would be impossible to hide something of this magnitude, that was there all of the time; he felt that compensation measures would be appropriate. In conclusion, the Leader stated that, whilst being fully supportive of the principle of offshore wind, the Council had many concerns regarding what it saw as serious impacts.

The Cabinet Member with responsibility for Customers, Communities and Leisure again stated the concerns of local people, referring, amongst other things, to noise and house prices. The Head of Planning and Coastal Management, referring to onshore elements, said that there would be an impact on communities; he referenced the two onshore stations being huge buildings and said that complete mitigation would not be possible, both during construction and permanently. In addition to that there would be no local benefits.

The Cabinet Member with responsibility for Coastal Management suggested that, perhaps, the recommendations should be amended, where applicable to refer to the seeking of compensation. This, he felt, would serve the communities better.

The Deputy Leader and Cabinet Member with responsibility for Economic Development referred to the special designated coast and stated that, as such, this needed to be protected; he stated that it was the Council's duty to do this.

Councillor Harvey, Ward Member for Kirton, commented that throughout the whole process, the Council had not been given sufficient information; this, she said, presented massive challenges, and worried her immensely. Councillor Harvey stated that the impact on the AONB, the impact on tourism, listed buildings, together with the loss of woods, must not be underestimated. It would, Councillor Harvey concluded, be a blot on the landscape. The Cabinet Member with responsibility for Customers, Communities and Leisure thanked Councillor Harvey for echoing the comments of many.

Concluding, the Deputy Leader and Cabinet Member with responsibility for Economic Development, stated that this would be the final opportunity that this Council had to consider this matter before it came before the Planning Inspector. Councillor Holdcroft stated that he wished to work with SPR in the coming weeks and months. Again, he referred to the huge impacts on the District's landscapes and stated that the Council had to consider the long term effect on the Friston

area and the seascape. During the construction phase there would, Councillor Holdcroft stated, be really significant effects, and it was not possible, at the moment, to quantify these.

It was proposed, seconded and unanimously

#### **RESOLVED**

- 1. That Cabinet agrees to inform Scottish Power Renewables that it continues to support the principle of offshore wind as a significant contributor to the reduction in carbon emissions and for the economic opportunities that it may bring to ports in the NALEP geography that could support the construction and maintenance of the windfarms. Notwithstanding that position, the Council:
- a) Objects to EA2 in relation to the significant effects predicted offshore by SPR on seascape, coastal landscapes, character and qualities of the AONB and cumulatively with EA1N. The EA2 project will result in a significant change to the sea views from key viewpoints on the AONB coast with the horizon cluttered with turbines. An impact which will be continuously experienced along the coastline further exacerbated when viewed in combination with EA1N and other existing wind farm arrays. That the Council expresses concerns in relation to the effects of EA1N on seascape, landscape and visual effects and objects in relation to the cumulative impacts with EA2;
- b) Objects to the overall impact of the onshore substations of EA1N and EA2 individually and cumulatively on the village and environs of Friston, including on archaeological and heritage assets, landscape character, visual effects, noise and residential amenity. The development of the substation site will permanently change the character of the landscape and have significant visual effects with the setting of the village and the relationship between the historic buildings and their farmland setting permanently changed. The development will also introduce a noise source within an existing tranquil location which at the present noise limit set (35dB) would unacceptably increase the background noise levels;
- c) Is of the view the impacts on the cable route are predominantly capable of being mitigated in the long term but the Council needs to discuss with SPR the measures necessary to mitigate impacts during the construction period including the transport impacts.
- d) Registers concern about both EA1N and EA2 projects in relation to the following matters:
  - i) Loss and sterilisation of good quality agricultural land at Friston in order to accommodate the substations for the projects;
  - ii) Impact on the Grade II listed building at Aldringham Court and its landscape setting from the cable route.
- e) Seeks further information from SPR on both EA1N and EA2 projects in relation to the following matters:
  - i) Impacts on air quality during the operational and construction phases of the projects, justifications for assessment scope and modelling results and cumulative impacts with Sizewell C;
  - ii) Gaps in the information available on flood risk impacts and flood alleviation;
  - iii) Noise sources on site including National Grid infrastructure and mitigation;

- iv) Highways modelling assessments and assumptions utilised, highways mitigation proposed and how this would be implemented and secured;
- v) Coastal processes associated with the cable landing point;
- vi) Ground contamination mitigation,
- vii) Ecology mitigation and justification for scope of assessments;
- viii) Archaeological surveys and results;
- ix) Impact of projects on heritage assets including assessment of coastal heritage assets;
- x) Socio-economic assessment assumptions and employment predictions, labour displacement effects, current skills shortages and mitigation strategies proposed;
- xi) Impact on tourism and recreation during the construction and operation phases and mitigation strategies;
- xii) National Grid connection infrastructure
- xiii) Cumulative impacts of the projects with other projects;
- f) Will impress upon the Planning Inspectorate that during examination of the impacts of EA1N and EA2 schemes, it should consider carefully the in-combination impacts with other energy projects in the area, including Sizewell C and the National Grid Venture projects;
- g) Agrees to work with SPR to identify the means by which the impact of the proposals can be mitigated and/or compensated if the developments do take place including the opportunity to achieve betterment in flood alleviation in Friston;
- h) Requires SPR to work closely with other developers including EDF Energy and National Grid Ventures to consider how mitigation across the schemes can be combined to minimise the impact of the totality of developments in the local area;
- Seeks a wider compensation package from developers and the Government that deals with the broader impacts on community, environment and businesses of this and other energy projects in the area.
- 2. That Cabinet agrees to raise with Government concerns that the process by which decisions made by National Grid without wider consultation on identifying points of connection to pylon lines is flawed. Furthermore, that the Council has a broader concern that Government needs to take a leadership role to develop a more strategic view on all energy projects, including managing the bringing forward of offshore windfarms and their associated onshore infrastructure, Sizewell C, interconnectors and extensions to and future new windfarms. That the Council lobby Government to take a clearer role in managing the energy projects in a way that would reduce the environmental impact and be more effective for the consumer.
- 3. That the Head of Planning and Coastal Management at Suffolk Coastal District Council in consultation with the Deputy Leader for Suffolk Coastal District Council / Cabinet Member for Economic Development, be authorised to draft and send responses to the EA1N and EA2 Phase 4 public consultations that are based on the issues summarised within the report.

## 6. Sizewell C Stage 3 Public Consultation

Cabinet received report **CAB 23/19** 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 and had launched its Stage 3 consultation for the proposal. Stage 3 was the final planned consultation phase for Sizewell C ahead of the formal submission of an application for development consent that would be determined by the Secretary of State for Business, Energy and Industrial Strategy.

The report before Cabinet set out a summary of the draft response to EDF Energy's Stage 3 consultation, with the full draft response in the appendix, as well as recommendations as to how the Council should work with other partners to maximise opportunities and minimise impacts of the development. It was proposed that Suffolk County Council (SCC) and Suffolk Coastal District Council (SCDC), both statutory consultees in this process, submit a joint response to the consultation, as they had done in the two previous consultation stages. It was considered that such a joint response would give greater weight to the views of the two councils.

The report summarised the progress made in some areas since the Stage 2 consultation, explained key changes in the proposals, and highlighted concerns and gaps in the evidence base provided by EDF Energy. The report considered whether or not sufficient progress had been made to enable SCDC to in principle fully support the development. SCC was taking a similar report with the same response attached to its Cabinet meeting on 12 March 2019.

Cabinet was asked to consider and if it was content, to endorse the responses set out in the report and the Appendix. Evidence to support these recommendations was set out in the main body of the report with further technical detail contained in the Appendix.

Cabinet Members had been provided with copies of EDF Energy's consultation documents.

The report explained that to understand the whole impact of this proposal on Suffolk, the report should be read in conjunction with the Cabinet report "Consultation by Scottish Power Renewables on East Anglia Offshore Windfarms One North and Two". Some of the recommendations were common or similar to both reports but had been included in each report so that each could be read as a stand-alone document.

The Deputy Leader and Cabinet Member with responsibility for Economic Development stated that the proposal by EDF Energy 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 £14bn 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 AONB which also contained many European and National ecological destinations. It would create 5,600 peak construction jobs plus 500 jobs supporting associated development sites, and in Stage 3, EDF Energy was also considering a higher assessment case considering the effects of a peak workforce of 7,900 workers plus 600 workers on associated development sites. Once in operation the power station would generate 900 permanent jobs. 60-70% of jobs were suggested to be non-nuclear specific. EDF Energy expected the development to generate a £100m per annum investment boost to the regional economy during construction and £40m per annum during construction.

Councillor Holdcroft stated that this proposal would be considered under the Nationally Significant Infrastructure Project (NSIP) process, under the Planning Act 2008, and it must be noted that the process of consultation was undertaken and "owned" by the development promoter and not by the local authorities. The planning application would be examined by the Planning Inspectorate who would make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy. It would be the Secretary of State who would make the decision on whether the proposal would be approved. However, the councils had a key role to play in putting forward the views of the local community. As consultees the councils were committed to doing all they could to make sure the development could work for the people of Suffolk as well as the nation's energy needs. Subsequently, there would also be a key role for the councils in providing a Local Impact Report for the examination of the application by the Planning Inspectorate. In these contexts, the roles of the two councils were equal. The councils, in particular the new East Suffolk Council, would, as local planning authorities, be responsible for discharging the requirements (planning conditions) on the Development Consent Order (DCO) and be responsible for the monitoring and enforcement of any DCO made.

Councillor Holdcroft emphasised that all issues had to considered in the balance; the good and the harm; he said that the B Station was described as iconic, but he emphasised that he did not want to see the area spoilt, if Sizewell C was coming, it had to be constructed in the best possible way.

Councillor Holdcroft, at this point, outlined the main changes compared to Stage 2, firstly in respect of transport proposals, then in respect of other proposals.

Councillor Holdcroft then stated that the Council was not content with the following aspects of the proposal: the dropping of a marine-led strategy; the introduction of four pylons; the introduction of additional permanent developments in the Suffolk Coast and Heaths AONB; and mitigation proposals for Wickham Market.

Turning to issues that the Council was not yet able to come to a considered view on, Councillor Holdcroft stated that these were socio-economic impacts; mitigation proposals for possible increase in workforce; ecological surveys and mitigation; platform footprint and positon; coastal processes; design of the nuclear power station; site crossing over the SSSI; beach landing facility; proposed redevelopment of the Northern Mound; spoil management proposals; location of the accommodation campus; land east of Eastlands Industrial Estate; surface and groundwater impacts; lack of sufficient evidence in the rail and road-led proposals, including mitigation proposals, road junction improvements, phasing of delivery of transport infrastructure, car park spaces etc.

The Council recognised, Councillor Holdcroft advised, that positive progress had been made in several topic areas, ie aspirations set for socio-economic topics; proposals for a housing fund and tourism fund; improvements in design of non-nuclear buildings; location of sports facilities in Leiston; two village bypass; location for park and ride facilities; the principle of a roundabout at A12/N1122 junction; upgrade of East Suffolk line(rail-led); bypass for Theberton (rail led); principle of mitigation for the B1122 and an alternative route (road led); wider compensation packages.

In conclusion, Councillor Holdcroft stated his wish to continue to press for the four villages bypass.

The Cabinet Member with responsibility for Customers, Communities and Leisure stated that, generally, local people recognised that a balance had to be achieved; however more information and detail was needed. Councillor Haworth-Culf stated that there must be proper

compensation and mitigation; the impact on quality of life was huge. In conclusion, Councillor Haworth-Culf asked that Cabinet Members be kept up to date as proposals moved forward.

The Leader emphasised the quality of the environment, the tourism offer, the good level of the economy and stated that, because of these factors the impact would be great; he stated that EDF Energy would have to go the extra mile in respect of compensation and mitigation.

The Cabinet Member with responsibility for Resources recognised the significant benefits of Sizewell C, but stated that the impacts, including traffic and tourism, must be taken into account.

The Cabinet Member with responsibility for Planning, in referring to any outstanding information, asked if the Secretary of State would have to resolve the outstanding issues. The Head of Planning and Coastal Management, in responding, stated that there would be the opportunity for the local authorities and others to raise any unresolved issues through representations to the Planning Inspectorate. EDF Energy had indicated that it hoped to submit its application in early 2020. Mr Ridley stated that the councils had good engagement with EDF Energy; if there were unresolved issues they would need to establish what they were and articulate them at the Inquiry. He also referred to the cumulative impact, the challenges ahead, the growing economy, and other projects coming forward. These issues would be tackled, working alongside others, through negotiation. There would be workshops together with meetings of JLAG.

The Cabinet Member with responsibility for Customers, Communities and Leisure referred to the need for support to be in place for town and parish councils; she asked what assistance could be provided by the District Council. The Head of Planning and Coastal Management agreed, stating that the District Council should do all that it could to provide support.

The Deputy Leader and Cabinet Member with responsibility for Economic Development emphasised that this was not the end of the process; there was, he said, a lot of work to be done over the next 18 months, by officers and by JLAG.

The Cabinet Member with responsibility for Coastal Management referred to an email that he had received, and he thought that other members of Cabinet probably had received too, from a member of the public referring mainly to air pollution issues and the impact on tourism and small to medium sized businesses in Suffolk Coastal. The Energy Projects Manager responded, stating that a lot of the points raised were in relation to road led proposals; all of the points had been raised by Environmental Health Officers and would be discussed further with EDF Energy. Discussions were also taking place with SCC regarding employing a consultant to take this forward.

Councillor Smith drew Cabinet's attention to paragraph 1.3 of the report, and the references to the views of the local community. Councillor Smith emphasised that the local community would have a spectrum of views and he stated the importance of the Council taking a wider balanced view; that, he said, was owed to all constituents.

Councillor Smith stated that he was very concerned regarding the balance taken on rail led / road led proposals; he stated that he had been very concerned, for a long time that the issues around the rail led strategy had not been properly considered in regard to the already critical lack of rail capacity in the eastern region of network rail on all routes through Ipswich to the south and the west whence construction materials would need to be sourced. Councillor Smith stated that he was unsure as to whether the councils' response around the model split was taking account of all issues and he stated that, in reality, there was a need to consider how the Sizewell project might affect the wider strategic economy.

Councillor Harvey, Ward Member for Kirton, stated that East Suffolk's tourism depended on people being able to reach the area; Councillor Harvey was concerned that the disruption to the rail would affect this, particularly at weekends. The roadworks at Yoxford, future works in the Adastral Park area, and the Copdock interchange would also have an impact. All of these things, together, Councillor Harvey felt could stop people coming to East Suffolk. Councillor Harvey described Minsmere as being the "jewel in the crown" and said that the birds would disappear. In conclusion, Councillor Harvey stated that it was critical to strike the right balance.

The Deputy Leader and Cabinet Member with responsibility for Economic Development said that tourism was 10% of the district's economy, and tourism must be protected. He said that there remained so many unanswered questions; at the moment there were more questions than answers.

The Cabinet Member with responsibility for Coastal Management, commenting on the points made by Councillor Harvey, agreed that Minsmere was a critical site; he said that everything possible must be done to defend this frontage. Councillor Smith also commented on drainage issues at Leiston; this, he said was a long term major issue.

In conclusion, the Leader referred to the joint response that would be made by SCC and SCDC; he supported the approach of a joint response and he thanked SCC colleagues.

It was proposed, seconded and unanimously

#### **RESOLVED**

- 1. That Suffolk Coastal District Council agrees to respond to the EDF Energy Stage 3 consultation and agrees an approach to Government and key partners to maximise the benefits of the proposed development. This recommendation is aligned to a report being taken to Suffolk County Council Cabinet on 12 March 2019.
- 2. That the Council agrees to seek to focus Government and all the promoters on the incombination effects of Sizewell C and proposals related to Offshore Wind projects and National Grid interconnectors in the Leiston area. The Council to seek commitments from Government, EDF Energy and the other promoters to explain how the in-combination effects will be addressed.
- 3. That, subject to agreement by the Cabinet of Suffolk Coastal District Council, (and subsequently by the Cabinet of Suffolk County Council on 12 March 2019) the response set out in detail in Appendix A to this report and summarised below will be submitted jointly, and that both Suffolk Coastal District Council and (subject to its meeting on 12 March 2019) Suffolk County Council will continue engagement with Government and key partners as set out below.
- 4. That the Council agrees to inform EDF Energy, in line with previously determined policy, that it continues to support the principle of a new nuclear power station at Sizewell, recognising the significant benefit that such a development would bring to Suffolk.
- 5. That the Council agrees to further inform EDF Energy it is disappointed the Stage 3 proposals have not evolved more considerably since Stage 2, particularly given the time that has been available and that this is a final public consultation. There remain a considerable number of issues to be addressed between Stage 3 and submission of the Development Consent Order (DCO). At this stage there are still some areas where this Council is not content, cannot come to a clear view or has been unable to update its response since Stage 2.

- 6. That, based on the new information put forward in the Stage 3 Consultation, it is agreed this Council is still not able to support all the specific proposals put forward by EDF Energy and the impacts of the proposed development are still not yet fully developed or evidenced. This Council expects to work with EDF Energy towards a position where its Cabinet can conclude that, on balance, the advantages of EDF Energy's proposals outweigh the disadvantages. This Council will work with EDF Energy to help it address the issues identified below and to develop its proposals, including seeking mutually to resolve the necessary mitigation and compensation. In particular, this Council wishes EDF Energy to address the following points:
  - a) To make the development deliverable in Suffolk and address areas of considerable public concern, there are a number of issues that EDF Energy needs to address. This Council is not content with the following aspects of the proposal:
  - i. The dropping of a marine-led materials transport strategy with the introduction of a road-led strategy alongside the alternative of a rail-led option. This Council continues to support marine-led and rail-led transport strategies and has not yet seen convincing evidence that a marine-led strategy is not feasible and/or environmentally preferable. If the marine-led option is proven to be impossible, the Council wishes to see the rail-led strategy implemented. This Council is not content with a road-led option, with the significant number of additional Heavy Goods Vehicles (HGVs) resulting in a detrimental effect on Suffolk's road network. This Council is not content with the possibility of a relaxation of HGV operating hours into the night time.
  - ii. The introduction of four tall pylons to the development site, which would have considerable detrimental impact on the AONB;
  - iii. The introduction of additional permanent development within the Area of Outstanding Natural Beauty (AONB), including the proposal of a training centre and outage car parking on Goose Hill;
  - iv. The mitigation proposals for Wickham Market while this Council welcomes the recognition of potential delays on the B1078 in Wickham Market as a result of additional Sizewell C traffic, the two proposed options for mitigation (removal of on-street car parking in Wickham Market or a diversion route via the narrow, weight restricted, and listed Glevering Bridge) are not appropriate.
    - b) That, due to a lack of further detail and/or enough evidence, it is agreed this Council is not yet able to come to a considered view regarding the following topic areas put forward in the Stage 3 Consultation, and would welcome further engagement with EDF Energy to consider more appropriate solutions:
      - i. Socio-economic impacts: While the Stage 3 consultation recognises the areas of work and impacts that need to be addressed, more information is required on the delivery mechanisms to achieve sufficiently ambitious socio-economic aspirations and mitigations, including employment opportunities for local residents and supply chain opportunities for local businesses. EDF Energy need to further detail their assessment of the adverse economic impacts, on tourism and other industries, and provider further detail to determine and mitigate the impact of the proposal on public services;
      - ii. Mitigation proposals for a possible increase of the expected workforce from 5,600 + 500 to 7,900 + 600, as part of EDF Energy's sensitivity testing: To consider the acceptability of an increase of the workforce number beyond 5600, this Council expects deliverable and enforceable mitigation proposals, to avoid or mitigate impacts on the local housing market, the local workforce and transport infrastructure. This Council does not accept

- that the consultation suggests that an increase of the workforce to up to 7900 does not create any additional traffic impact as suggested;
- iii. Ecological surveys and mitigation: EDF Energy need to undertake further significant work to seek to survey, understand, quantify and qualify and mitigate impacts of the development on the ecology;
- iv. The platform footprint and position: This Council highlighted at Stage 2 that the proposed footprint is further seaward than Sizewell B, which gives this Council significant concerns around the impact on coastal processes and coastline and may make this design unacceptable. The Council needs to see a full assessment of the coastal process impacts and an assessment of alternatives (such as moving the platform back inland, or redesigning the layout);
- Coastal processes: EDF Energy need to undertake further assessments, and establish with this Council a robust process for ongoing monitoring of coastal change and Sizewell C impacts, with an obligation for EDF Energy to provide mitigation if actual change departs from anticipated baseline change;
- vi. The design of the proposed nuclear power station: Whilst improvements have been made to the design of some non-nuclear buildings (see c) iii) below), this Council remain concerned about the overall design of the site, and requests that the nuclear power station design is independently reviewed through the Design Council (formerly known as CABE);
- vii. The site access crossing over the Site for Special Scientific Interest: This Council require further evidence to show why EDF Energy have chosen the causeway with culvert as its proposed scheme above the three span bridge, which was this Council's preference at Stage 2;
- viii. The Beach Landing Facility: While this Council supports the principle of a Beach Landing Facility to allow deliveries of large items via sea, EDF Energy needs to provide appropriate levels of detail and evidence on the impacts and practicalities of such a facility, addressing concerns including impacts on coastal processes, ecology, landscape and access to the beach and the England Coast Path;
- ix. The proposed redevelopment of the Northern Mound: Further detail and impact assessment needs to be provided;
- x. The spoil management proposals: This Council requires additional information and evidence to convince it that the proposed borrow pits and stockpiling will not have an unacceptable impact on the sensitive local environment (including on the Area of Outstanding Natural Beauty and the Royal Society for the Protection of Birds (RSPB) Minsmere) and on neighbouring land uses;
- xi. The location of the accommodation campus remains a local concern: EDF Energy is requested to provide further evidence to demonstrate why it considers its favoured location to be the optimal location. This Council would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus (as either of these sites could have genuine legacy potential). Suffolk County Council would like EDF Energy to also reconsider the nearby Leiston airfield site as an alternative location for the campus. Subject to receipt of that justification, whatever accommodation campus site is chosen the evidence will need to prove that environmental impacts can be sufficiently mitigated and compensated for;

- xii. Land east of Eastlands Industrial Estate (LEEIE): While this Council is content with the principle of operational construction use of the LEEIE, it has concerns regarding the number of different uses proposed and the relationship between these. EDF Energy needs to provide evidence that the site can be appropriately drained from a surface water perspective, does not include overdevelopment of the caravan site, and can provide mitigation for potential detrimental environmental health impacts on neighbouring residents;
- xiii. Surface and ground water impacts: EDF Energy is asked to provide detailed proposals on drainage and dealing with surface water. It needs to provide assessments on potential impacts on ground water, and evidence that the development does not result in unacceptable impacts on groundwater levels and related biodiversity (including from an increase in weight of the platform as a result of its increased height);
- xiv. Notwithstanding paragraph a) i) regarding this Council's overall concerns with the transport strategy, the Council considers that for the following aspects of a rail-led, road-led or indeed marine-led proposal, lack of sufficient evidence means this Council cannot come to a considered view:
  - a) The suitability of proposed traffic mitigation measures: This Council requires further clarification in several areas related to EDF Energy's traffic modelling and gravity model to determine whether the traffic mitigation measures are enough. This Council requires evidence to explain the modelled HGV numbers, to justify the assumption of a split of 85% of materials coming from the South and 15% from the North, and an indication of the number of Abnormal Indivisible Loads (AILs) arriving by road and by sea.
  - b) The route of the proposed Sizewell Link Road from the A12 to the development site in the road-led strategy: the provision of a relief road for the B1122 is welcome but the option proposed is yet to be supported by sufficient evidence. The case to justify the best possible route must revisit all the routes considered by the promoter, with a comprehensive highways analysis and be mindful of any impact on allocations in the District Council's Local Plan and any other potential developments;
  - c) The requirement for road and junction improvements in addition to those proposed in Stage 3: EDF Energy is asked to develop mitigation proposals for additional traffic pinch points affected by Sizewell C construction traffic which have not been covered, or to provide full evidence that these locations and communities are not significantly affected by their proposal. This Council expects that improvements are required for the A12 in the Woodbridge area, for several other junctions along the A12, and for the B1078 and A1120 as well as Leiston and rural roads;
  - d) The phasing of associated transport infrastructure: This Council requires a firm commitment for early delivery of the associated transport infrastructure to avoid disruption to the main haul route (A12-B1122) during the construction period;
  - e) The car park spaces: EDF Energy need to justify that the total number of proposed car park spaces, at the Park and Ride sites, on site and at the accommodation campus, are required;
  - f) (rail-led strategy) Additional road mitigation: EDF Energy need to evidence whether the rail-led strategy requires additional road mitigation as proposed

under the road-led strategy, including mitigation for Middleton Moor and the provision of a Freight Management Facility.

- c) That Suffolk Coastal District Council recognises the positive progress made in several topic areas, and supports the following proposals put forward in the consultation:
  - The aspirations set for the socio-economic topics, although this Council asks EDF Energy to be even more ambitious in increasing the percentage of locally based workers (see also recommendation b) i) above);
  - ii. The proposal to set up a Housing Fund and Tourism Fund to provide mitigation in these areas, the details of which are still to be developed;
  - iii. The improvements in the design of some of the non-nuclear buildings on the main development site (see also b) vi) above);
  - iv. The location of sports facilities in Leiston;
  - v. Notwithstanding paragraph a) i) regarding this Councils concerns over the transport strategy, the Council supports the principle of the following aspects of a transport strategy:
    - Two-Village Bypass for Farnham and Stratford St Andrew: This Council
      welcomes this proposal as it had requested the two-village bypass as
      minimum mitigation at Stage 2, however the Council is still reviewing
      whether additional mitigation, particularly for a road-led strategy, for
      Marlesford and especially Little Glemham will be required;
    - 2. The proposed locations for Park and Ride facilities in Darsham and Wickham Market/Lower Hacheston;
    - 3. The principle of the proposed roundabout at the A12/B1122 junction in Yoxford;
    - 4. (Rail-led strategy) The proposed upgrade of the East Suffolk Line, including a new passing loop and upgrades of level crossings (subject to specific comments particularly related to some of the proposed level crossing closures);
    - (Rail-led strategy): The principle of mitigation for the B1122, and creating a bypass for Theberton (further consideration will need to be given whether additional mitigation is required for Middleton Moor);
    - 6. (Road-led strategy) The principle of mitigation for the B1122, and the creation of an alternative route from the A12 to site in the road-led strategy (but see b) xiv) b) above);
    - 7. (Road-led strategy) The principle of a Freight Management Facility in the wider Ipswich area, although further information, including the assessment of alternative options, is required to advise on this Council's preferred location.
- d) That, for those impacts of the development that are residual and cannot be mitigated, this Council expects EDF Energy to provide wider compensation packages, including compensation for the lasting impact on and damage to the AONB and the wider landscape around the development which is important to protect and enhance the setting of the AONB and is highly valued by the local community and visitors. This Council will want to discuss the governance of such a fund with EDF Energy. It should be stressed that compensation should only be considered after having exhausted all options to avoid or mitigate impacts.

- 7. That, in consultation with the Council's lead Member (the Deputy Leader of Suffolk Coastal District Council, the lead officer (the Head of Planning & Coastal Management of Suffolk Coastal District Council) be authorised to make any amendments to the draft response as agreed with the appropriate representatives of Suffolk Coastal District Council.
- 8. That, to effectively deliver infrastructure of this scale alongside other large infrastructure projects in Suffolk including the proposals by Scottish Power Renewables and National Grid Ventures in the Leiston area, the Sizewell C development requires EDF Energy, other developers, the local Councils Suffolk Coastal and Suffolk County, the New Anglia Local Economic Partnership and Government to work closely together to minimise negative impacts and maximise opportunities locally. That, to achieve this, officers and Members continue to engage with Government and partners, including through the Suffolk Energy Coast Delivery Board chaired by Therese Coffey MP, to maximise the benefits from the development. It is recommended that:
  - This Council lobby for Government, or one of its agencies, to be charged with taking the lead on the coordination of the range of energy projects in the Sizewell area in a way that enables their overall impact to be assessed in advance before commitments are made to initial schemes;
  - b) EDF Energy be asked to work closely with other developers, including Scottish Power Renewables and National Grid Ventures, to consider how mitigation across the schemes can be combined to minimise the impact of the totality of developments on the local area;
  - This Council continues to promote proposals for a four-village bypass as part of the Suffolk Energy Gateway, and aim to persuade Government to provide funding for this alongside local contributions from EDF Energy and Suffolk County Council;
  - d) This Council works with Government and relevant agencies on additional requirements for infrastructure to accommodate Sizewell C alongside other significant strategic developments in Suffolk;
  - e) This Council seeks to persuade Government to make the maximum level of community benefits available for Suffolk, including but not limited to maximising the amount of business rates arising from Sizewell C to be retained in Suffolk;
  - f) This Council continues work closely with the Suffolk Energy Coast Delivery Board, MPs and other partner organisations to maximise the opportunities for skills, employment and the supply chain in Suffolk.
- 9. That this Council continues to engage closely with all key partners to develop an evidence base on the impacts of all aspects of the proposal and develops the mitigation/compensation options, including:
  - a) Significant local engagement, by working closely with Town and Parish Councils, and other groups/bodies, as appropriate, to develop a local evidence base;
  - b) Further work on the environmental impact of the development with the key environmental government bodies, including the Environment Agency and Natural England, and with non-governmental organisations such as the National Trust, the RSPB and the Suffolk Wildlife Trust;
  - c) Further collaboration with the relevant organisations, including Chamber of Commerce and the New Anglia Local Economic Partnership, in partnership with EDF Energy, on maximising skills, employment, and supply chain opportunities in Suffolk and the region, as well as engagement with Essex local authorities in relation to additional economic and employment

opportunities from the possible presence of two new nuclear power stations (Bradwell B as well as Sizewell C) in the region.

## 7. Exempt / Confidential Items

It was proposed, seconded and unanimously

## **RESOLVED**

That, under Section 100(a)(4) of the Local Government Act 1972 (as amended), the public be excluded from the Meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.

## 8. Task Group Minutes

It was proposed, seconded and unanimously

#### **RESOLVED**

That the Exempt Minutes of the Sizewell C Task Group Meeting held on 12 February 2019 be approved as a correct record and signed by the Chairman.

The Meeting concluded at 9.00 pm.