



## STRATEGIC PLANNING COMMITTEE

Monday, 9 September 2019

### EAST SUFFOLK COUNCIL RESPONSE TO EDF ENERGY'S SIZEWELL C NEW NUCLEAR POWER STATION STAGE 4 PUBLIC CONSULTATION

#### EXECUTIVE SUMMARY

1. EDF Energy is holding a fourth public consultation into their proposals for a new nuclear power station, Sizewell C, in the parish of Leiston-cum-Sizewell. This is an additional round of consultation that was announced in July 2019. It runs for 10 weeks from 18 July to 27 September 2019.
2. Previous rounds of public consultation have resulted in joint responses being sent to EDF Energy on behalf of East Suffolk Council (formerly Suffolk Coastal District Council) and Suffolk County Council following jointly prepared Cabinet reports. The intention is for the full response to be presented to East Suffolk Council's Cabinet at a special meeting on Monday 23 September, it is again intended that the same report will be presented to Suffolk County Council's Cabinet on Tuesday 24 September.
3. This report provides background to the consultation, detail of the consultation, and the Councils previous stance at Stages 1 – 3 (where relevant) in order to seek advice from the Strategic Planning Committee on how the Deputy Leader and Cabinet Member for Economic Development, Cllr Craig Rivett, should advise Cabinet on the Councils response to the Stage 4 public consultation.
4. The recommendation is that Strategic Planning Committee supports Cllr Craig Rivett as the Cabinet Member responsible for the report responding to the Stage 4 public consultation, in presenting a draft response to Cabinet highlighting areas of remaining concern with the Sizewell C project but recognising that the Council supports the principle of new nuclear development provided it is constructed and operated in a manner that benefits the residents of East Suffolk more than it adversely affects them.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	Aldeburgh & Leiston, Kelsale & Yoxford, Saxmundham, Wickham Market, Wrentham, Wangford & Westleton, Melton, Woodbridge, Carlford & Fynn Valley, Orwell & Villages, Martlesham & Purdis Farm
<b>Cabinet Member:</b>	<p>Cllr Craig Rivett</p> <p>Deputy Leader &amp; Cabinet Member with responsibility for Economic Development</p>
<b>Supporting Officer:</b>	<p>Lisa Chandler</p> <p>Energy Projects Manager</p> <p>01394 444538</p> <p><a href="mailto:Lisa.chandler@eastsuffolk.gov.uk">Lisa.chandler@eastsuffolk.gov.uk</a></p>

## **1 INTRODUCTION**

- 1.1 EDF Energy is proposing to build a new nuclear power station at Sizewell. A Stage 3 public consultation was carried out earlier this year in March. A joint response from Suffolk Coastal District Council and Suffolk County Council was sent following a Cabinet meeting at SCDC on the 11 March 2019, a response was also sent on behalf of Waveney District Council to EDF Energy. Both these responses are available on our website.
- 1.2 EDF Energy announced a fourth stage of public consultation between 18 July – 27 September 2019, this is described as being an extension to the Stage 3 consultation and is targeted on specific elements of their proposals. At this stage in the 10 week consultation process, all the technical officers involved on behalf of East Suffolk Council and the Energy Team are still working closely with Suffolk County Council on formulating a joint response to the Stage 4 public consultation.
- 1.3 This Committee will be verbally updated on the 9 September on the most recent draft response; the full draft response will be presented to East Suffolk Council's Cabinet at a special meeting on the 23 September. The Deputy Leader and Cabinet Member for Economic Development, Cllr Craig Rivett, welcomes the advice of Strategic Planning Committee in taking this response forward to a Cabinet decision.

## **2 EDF ENERGY'S STAGE 4 PUBLIC CONSULTATION**

- 2.1 The Stage 4 public consultation by EDF Energy is likely to be the final round of public consultation prior to EDF Energy submitting their application to the Secretary of State for Business, Energy and Industrial Strategy, for Development Consent Order (DCO) under the Planning Act 2008. EDF Energy have indicated that the DCO submission will be made in Spring 2020. East Suffolk Council as host Authority is a statutory consultee in the DCO process.
- 2.2 In the early stages of this consultation process, we jointly held an event with Suffolk County Council and invited our Towns and Parish Councils likely to be affected by the proposals to attend and give us their feedback on EDF Energy's Stage 4 proposals. The event was well attended and a summary of comments received is available on our website.
- 2.3 The Stage 4 public consultation makes clear that this consultation is an addition to and not a replacement for the Stage 3 public consultation and that all comments received at Stage 3 remain valid and will not be superseded by comments received in relation to Stage 4 (unless specified).
- 2.4 The key areas for consideration in Stage 4 by EDF Energy are:
  - a) an alternative freight management option referred to as the integrated strategy (combines features of both the rail-led and road-led strategies consulted at Stage 3);
  - b) an alternative approach for traffic management with regard to additional traffic movements through Wickham Market in connection with the southern park and ride facility;
  - c) a new option for the rail-head at land east of Eastland's Industrial Estate;
  - d) whether the Sizewell link road should be a permanent development or whether sections of the road should be removed at the end of the construction period;
  - e) proposals for flood mitigation areas which require significant additional land;
  - f) proposals for ecological mitigation areas which require significant additional land;and

- g) other less significant red line changes to site area across the projects main development site and associated development sites.

2.5 We are currently working with SCC on formulating our joint response in the above areas and a verbal update on these discussions will be given at the meeting.

2.6 However, there are a number of concerns that we raised jointly at Stage 3 which EDF Energy has not taken the opportunity to address in the Stage 4 consultation, this includes:

- h) the dropping of a marine-led construction strategy – we still have not received the justification from EDF Energy dropping the marine-led strategy at Stage 3;
- i) introduction of four pylons on the operational site– EDF Energy have suggested two alternative options but both include keeping at least 4 pylons, we had sought an alternative to new pylons at Stage 3;
- j) introduction of additional permanent development to the north of the main operational site within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;
- k) mitigation proposals for Wickham Market –stage 4 does not revise previously proposed options for Wickham Market but refers to working with the Parish Council to provide further options;
- l) mitigation proposals for an increased workforce now proposed at 7900 + 600 – this was sensitivity tested at Stage 3 but is now being proposed as a maximum but no additional mitigation measures are incorporated at Stage 4;
- m) further ecological surveys and mitigation – this is an ongoing process and further work is being undertaken by EDF Energy in this area;
- n) platform footprint and position – nothing referring to this in Stage 4;
- o) coastal processes – nothing additional in this area – at Stage 3 we sought recognition of the ongoing monitoring regime that will be required and has been requested;
- p) design of the nuclear power station – independent review, no comment on this in Stage 4;
- q) SSSI crossing – no satisfactory response in Stage 4 to concerns raised at Stage 3;
- r) beach landing facility – we had questions at Stage 3 that have not been answered;
- s) Northern Mound – again we had questions at Stage 3 that have not been answered;
- t) spoil management proposals – as above, we raised concerns at Stage 3 and these have not been addressed in Stage 4;
- u) evidence for siting of campus where proposed – the Councils had asked for further evidence as to why the campus cannot be sited in Ipswich or Lowestoft;
- v) proposals for land east of Eastlands Industrial Estate (LEEIE) – we are pleased to see that revisions to the layout have been included at Stage 4 but we still have questions with regards to overnight train movements, noise, unloading / loading of trains, park and ride on the site (who for?), HGV parking – is this just for vehicles transferring aggregate from the rail head to the main site? None of these questions answered.
- w) surface, ground and potable water impacts – further detail and reassurance in this area is required and is not included at Stage 4;
- x) suitability of proposed traffic mitigation measures – there are some details in Stage 4 but these are limited;

- y) requirement for road and junction improvements – this remains an area for discussion with EDF Energy around works that may be required;
- z) phasing of associated transport infrastructure – at Stage 3 we requested details of the phasing plan for associated development and this has not yet been made available;
- aa) Car park spaces justification – at Stage 3 we wanted a calculation to ensure the appropriate number of car park spaces are proposed at park and rides, the campus and the main site, this has not been received; and
- bb) rail-led strategy – we had suggested additional road mitigation that was required to support this at Stage 3, no further information has been provided at Stage 4.

2.7 Therefore in addition to responding to the issues raised at Stage 4, we will need to refer to the matters not covered that remain outstanding. In all areas we expect EDF Energy to continue working with us in order to address as many of our outstanding concerns pre-DCO submission as is possible. It is expected that we will not have time between now and submission to address all of the outstanding issues but it is hoped we can agree (or disagree) common ground in a good proportion of issues prior to EDF Energy submitting their DCO in Quarter 1 2020.

### **3 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?**

3.1 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. The new nuclear power station site at Sizewell C is designated by National Government and proposals to take it forward are being promoted by EDF Energy who operates the existing nuclear power station, Sizewell B, on the East Suffolk coast at Sizewell. Alongside the now decommissioned Sizewell A, East Suffolk, has a long history of hosting nuclear power stations and we recognise the opportunities hosting a nuclear power station brings to the area including economic prosperity and growth – with permanent and temporary jobs, a highly skilled work force, investment and spend in the local supply chain, and environmental benefits – nuclear is a recognised low carbon producer of electricity. However, we acknowledge that there are also areas of environmental harm that need to be carefully considered and assessed. By working with EDF Energy on boosting skills and education in East Suffolk the proposal can help with enabling communities to make the most of the opportunities available during construction and operation of the nuclear power station. The Councils ability to respond in full to EDF Energy's proposals is partly because of an agreed Planning Performance Agreement by which EDF Energy contribute financially to the Council, enabling us to make sure we have the appropriate staff across the Authority able to interact with EDF Energy in relation to the Sizewell C proposal. This includes staff across almost all of the areas covered by critical success factors identified in the Business Plan. A specific action in the Business Plan is to: Advocate on behalf of communities & local stakeholders to maximise the local economic, community and environmental benefits & opportunities from the Sizewell C development.

## **4 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 4.1 As stated above, EDF Energy fund East Suffolk Council for just over 6 full time equivalent posts across various service areas, to enable us to fully engage with EDF Energy on the specific technical details of their project in order to identify and mitigate potential adverse impacts arising from their development proposals. We also work collaboratively with the County Council and other statutory consultees in order to ensure we are speaking with one voice where possible in order to emphasise our position in certain areas. The monies paid to this Authority by EDF Energy are reinvested in the service areas and used to backfill posts where necessary. By doing this, we avoid the use of consultants and maintain the knowledge and expertise in-house.

## **5 OTHER KEY ISSUES**

- 5.1 This report has not carried out its own Equality Impact Assessment, as a consultee in the process, we are not responsible for ensuring it has been carried out suitably, and EDF Energy will be responsible for carrying out their own EqlA on their consultation process.

## **6 CONSULTATION**

- 6.1 East Suffolk Council has carried out our own consultation with town and parish councils although we are not obligated to do so. This event was held jointly with Suffolk County Council and our Town and Parish Councils were invited to send a representative, this event was held in order for us to understand the concerns of our local residents in relation to the Stage 4 proposals. We have also carried out internal consultation with technical officers in areas including: economic development, housing, coastal management, landscape, ecology, environmental health, and communities in order to combine with technical responses from SCC officers including highways, archaeology, education and skills, and social care, in order to produce a robust response to the Stage 4 consultation which highlights areas where we await further detail.
- 6.2 EDF Energy continue to engage with officers on the emerging proposal seeking to address the outstanding issues/concerns that have been raised ahead of their DCO submission. Cllr Rivett, as the lead Cabinet Member, and senior officers, also have regular meetings with senior representatives of EDF Energy such that it is anticipated that many of the issues highlighted will have been “worked through” and that agreement can be hopefully reached to enable East Suffolk Council to be confident that the benefits to our area are such as to outweigh the negative impacts delivered as a nominated nuclear new build site that is identified in the national policy statements for energy (EN1 and EN6).

## **7 OTHER OPTIONS CONSIDERED**

- 7.1 It is not for East Suffolk Council to consider alternative options to that provided by EDF Energy in their proposals.

## **8 REASON FOR RECOMMENDATION**

- 8.1 It is important for East Suffolk Council to continue our process of pre-application discussions with EDF Energy and a key part of this is publicly responding to their proposals when the opportunity arises which includes this Stage 4 public consultation.
- 8.2 As such Strategic Planning Committee is asked to endorse the Deputy Leader and Cabinet Member for Economic Development in continuing to draft a response to EDF Energy’s Stage 4 public consultation that seeks to fully and appropriately represent the needs of East Suffolk as a Council, for its residents, businesses and visitors and in aspiring to reach the goals of our Business Plan.

## RECOMMENDATION

That the Strategic Planning Committee endorses and supports the Deputy Leader and Cabinet Member for Economic Development in working with Suffolk County Council to achieve a joint response to EDF Energy's Stage 4 public consultation to be presented to East Suffolk Council Cabinet on the 23 September 2019.

## APPENDICES – None

## BACKGROUND PAPERS

Please note that copies of background papers have not been published on the Council's website [www.eastsuffolk.gov.uk](http://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.

Date	Type	Available From
18.07.2019	Sizewell C Stage 4 Public Consultation Documents	<a href="https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/proposals/stage-4">https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/proposals/stage-4</a>
11.03.2019	Sizewell C Stage 3 Joint Council response and Cabinet report and Waveney District Council response	<a href="https://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/stage-three-consultation/">https://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/stage-three-consultation/</a>
26.07.2019	Summary of Town and Parish Council event	<a href="http://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/community-engagement/stage-4-ufford-park-melton-26-july-2019/">http://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/community-engagement/stage-4-ufford-park-melton-26-july-2019/</a>