

14 MARCH 2019



SUFFOLK COASTAL DISTRICT COUNCIL

WEEK ENDING 15 MARCH 2019

**DECISIONS BY THE CABINET  
CALL IN DEADLINE 5.00 PM ON 21 MARCH 2019**

**The following decisions have been taken by the Cabinet and will come into effect on 22 March 2019 unless the call-in procedure is activated:**

**(For clarity, where an item is 'to be noted', 'received' or recommended to Council for a decision, this is deemed not to be a formal Executive decision and so the call-in provisions will not apply).**

**Report Title / Ref No: East Anglia One North and East Anglia Two Offshore Windfarms Phase 4 Consultation from Scottish Power Renewables (CAB 22/19)**

**Decision Made by Cabinet:**

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;
  - i) 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.

**Reason for Decision:**

As statutory consultees, Suffolk County Council and Suffolk Coastal District Council have scrutinised the information on the projects submitted by Scottish Power Renewables. They conclude that the proposals which are subject to consultation would have a significant impact on the village of Friston, the cable corridor (during construction) and the wider coastal environment. In addition, there are wider concerns which relate to Government policy on the onshore elements of offshore windfarms.

**Alternative Options Considered and Rejected:** None.

**Any Declarations of Interest declared:** None.

**Any Dispensation Granted:** None.

**Report Title / Ref No:** Sizewell C Stage 3 Public Consultation (CAB 23/19)

**Decision Made by Cabinet:**

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 in-combination 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 provide 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);
  - v. 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:

- i. 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 Council's concerns over the transport strategy, the Council supports the principle of the following aspects of a transport strategy:

1. 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);
5. (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:
  - a) 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;
  - c) 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.

**Reason for Decision:**

The decisions are based on many months of work led by the Deputy Leader for Suffolk Coastal District Council, and the Cabinet Member for Finance and Assets and Cabinet Lead for Sizewell C for Suffolk County Council in the lead up to and during the Stage 3 consultation. It presents the councils' proposed way forward based on the information supplied by EDF Energy through its public consultation.

**Alternative Options Considered and Rejected:** None.

**Any Declarations of Interest declared:** None.

**Any Dispensation Granted:** None.

**Report Title / Ref No:** Decision to Write Off Non Domestic Rates (CAB 24/19)

**Decision Made by Cabinet:**

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

**Reason for Decision:**

Financial Procedure Rules require Cabinet to approve the write off of sums that exceed £50,000 and there is no further action that can be taken to recover the debt.

**Alternative Options Considered and Rejected:** None.

**Any Declarations of Interest declared:** None.

**Any Dispensation Granted:** None.

**DECISIONS BY INDIVIDUAL CABINET MEMBERS  
CALL IN DEADLINE 5.00 PM ON 21 MARCH 2019**

**Title: Write off Non-Domestic Rates**

**Decision Made by Cabinet Member with responsibility for Resources:**

That the Cabinet Member with responsibility for Resources agrees to write off 12 outstanding non-domestic rates debts that are individually below the £50,00 limit.

**Reason for Decision:** No other options are available.

**Other Options Considered and Rejected:** None.

**Any Declarations of Interest Declared:** None.

**Any Dispensations Grants:** None.

**DECISIONS BY INDIVIDUAL AUTHORISED OFFICERS  
IN RESPECT OF KEY DECISIONS  
CALL IN DEADLINE 5.00 PM ON 21 MARCH 2019**

No decisions were taken by individual authorised officers this week.

If you have a query or wish to request that a proposed decision is called in, please contact the Democratic Services Section by telephone on 01394 444326 or by email to [democratic.services.scdc@eastsoffolk.gov.uk](mailto:democratic.services.scdc@eastsoffolk.gov.uk)