



# **Relevant Representation of Suffolk County Council in respect of the proposals for the Sizewell C Nuclear Power Station under section 56 of the Planning Act 2008**

**28 September 2020**

*Suffolk County Council's Registration Identification  
Number with the Planning Inspectorate: 20026012*

**SUMMARY**

1. Suffolk County Council (the Council) has always supported the principle of a new nuclear power station at Sizewell, recognising that Sizewell C would be an important contribution to the national energy strategy and welcoming the benefits such a development would bring to Suffolk, regarding jobs, skills and legacy.
2. However, whilst the Council has always supported a new nuclear power station at Sizewell in principle, it cannot support the current proposals as submitted by the applicant in its Development Consent Order (DCO) application.
3. The Council does not consider the DCO proposals sufficiently avoid, minimise, mitigate, or compensate for the impacts it will have on the communities and environment of Suffolk. To be acceptable and to make the development work for Suffolk, it is essential that these impacts are minimised, by following the mitigation hierarchy (avoid – minimise - mitigate – compensate), prioritising sustainable transport modes and by addressing the sensitivity of its location and any community impacts arising.
4. The Council sets out in this Relevant Representation the areas where the Council has significant concerns that remain unresolved. The impacts of the proposals submitted by the applicant will be further expanded on in the Council's Local Impact Report which will be submitted separately at a later stage. The Council will provide further amplification and detail of its concerns, where appropriate, in the its Written Representations.
5. The Council does not support the applicant's proposed freight transport strategy as it stands, due to the fact that (1) it is not a sustainable strategy, because an increased proportion of rail transport (and potentially sea-borne transport) could be reasonably achievable, and (2) it does not currently mitigate its transport impacts on the highway network to acceptable levels for the community. The Council asks the Examining Authority to consider the proposals against national policies promoting sustainable transport solutions. The Council is not content that the Sizewell C proposals have not replicated the much greater use of sea transport which occurred at Hinkley Point C and is proposed for Bradwell B. Given the minimal use of sea transport, the Council is particularly disappointed that opportunities have not been taken up by the applicant to pursue an upgrade of the East Suffolk Line which would allow for a greater percentage of materials to be delivered to site by rail. The Council considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries at this point.
6. In the event that the Examining Authority considers the applicant's transport strategy as it stands today as an acceptable approach, the Council as the Local Highway Authority would seek additional assurances from the applicant, in order to secure the maximum possible rail and sea usage, robust transport controls and monitoring arrangements, and additional mitigation to address

junction and road capacity issues, increased carbon footprint and emissions and community impacts.

7. Notwithstanding the Council not supporting the applicant's freight transport strategy, the Council has instructed its officers to seek to resolve the following (non-exhaustive list of) key concerns, in advance of and during the examination:
- i) Maximising the tonnage of freight to be delivered by rail and sea;
  - ii) Securing controls for all Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs), and robust transport management plans and monitoring arrangements of all Sizewell C traffic;
  - iii) Additional highway improvements required to ensure continued sustainable and safe movement of people and materials and improving road capacity (locations where additional improvements are sought are listed in paragraph 33 below);
  - iv) Aspirational travel plan measures and associated appropriate improvements in sustainable transport infrastructure so that construction workers use sustainable modes of transport rather than cars to reach the main development site and Park and Ride sites;
  - v) Designing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction;
  - vi) Removing the proposed pylons for electricity export connection on the main development site, by utilising alternative means to connect to the grid;
  - vii) Replacing the proposed causeway to cross the Sizewell Marshes Site of Special Scientific Interest (SSSI) with a three-span bridge design, to reduce its ecological impact;
  - viii) Providing comprehensive mitigation for a range of species, including bats and water voles;
  - ix) Providing robust contingency strategies for fen meadow and wet woodland mitigation;
  - x) Improving ecological connectivity to Aldhurst Farm;
  - xi) Removing the outage car park from its proposed location within the Suffolk Coast and Heath Area of Natural Beauty (AONB), by either co-locating it with Sizewell B outage car park or replacing it with a Park and Ride solution;
  - xii) A comprehensive coastal change Monitoring and Mitigation Plan (MMP), with an allocated mitigation/compensation budget, that allows determining if and to what extent an observed coastal change in the Sizewell C zone of influence is attributable to the development, and appropriate and required mitigation measures;
  - xiii) Provision for the cost of full removal of the hard sea defence as part of the decommissioning process unless and until a future study changes this position;

- xiv) Acceptable realignment of the coastal footpath, as well as a safe and suitable diversion route during its closure for the construction of the development and for the operation of the Beach Landing Facility;
  - xv) Introducing appropriate mitigation packages for transport related community impacts (including noise and vibration from road and rail transport, at day and night-time, and mitigating the economic cost of congestion);
  - xvi) Acceptable proposals for potable water supply;
  - xvii) Acceptable and sustainable drainage solutions for the Main Development Site, Land East of Eastlands Industrial Estate and the Associated Development Sites;
  - xviii) An acceptable solution to mitigate the impact on the Leiston Household Waste Recycling Centre at Lovers Lane;
  - xix) Securing the necessary archaeological work, by providing a suitably detailed overarching written scheme of investigation and binding commitments;
  - xx) Comprehensive monitoring arrangements in all areas, but particularly for natural environment and transport impacts, with appropriate attached contingency funding for unforeseen impacts identified by monitoring/review groups.
8. Noting that the applicant proposes funds to mitigate and compensate its impacts, to make these acceptable to the Council, each of these need to be of reasonable size and scope, and have clear criteria and robust governance. The Council will raise its proposals on the hosting of and the governance for and between these funds separately with the applicant. The funds to be considered include:
- i) A natural environment fund (for both the construction period and whole lifetime of the power station including decommissioning – to deal with impacts on ecology and on AONB special qualities and characteristics – which needs to be wider than the proposed AONB Fund);
  - ii) Community Fund;
  - iii) Tourism Fund;
  - iv) Skills, aspiration and employment investment package;
  - v) Housing Fund;
  - vi) Funding package to mitigate health and community safety impacts;
  - vii) Public Services Resilience Fund;
  - viii) Costed mitigation package for Leiston and Wickham Market, acceptable to the Town/Parish Council, with legal assurance from the applicant to cover possible cost overruns;
  - ix) Contributions towards increased highway maintenance costs resulting from construction traffic using the A12, B1122 and other local roads. This includes additional costs to undertake maintenance at night or

advance of construction to avoid disruption and structural damage to local highways;

- x) Public Rights of Way and cycling package;
  - xi) Suitable levels of funding for Council officers to manage controls and mitigations, discharge requirements and engage with the applicant, including funding of the Transport Review Group and other management groups.
9. The County Council expects that it will take the lead in discharging requirements related to its relevant statutory functions, specifically highways (including Public Rights of Way), drainage and surface water, and archaeology. The Council accepts that East Suffolk Council is the appropriate discharging authority for all other matters but asks that a formal requirement is put in place that the County Council be fully consulted on these matters before any requirement is discharged. The County Council expects to reciprocate this arrangement for the activities where it has functional responsibility.
10. It is disappointing that several gaps in the evidence base presented by the applicant remain, despite the Council and other stakeholders requesting specific additional information at every stage of pre-submission consultation. The submission leaves evidence gaps in, for example, assessing impacts and mitigation requirements for the natural environment, or for the removal of the marine and rail options during the consultation period. The Council is also concerned about the silo approach taken in the Environmental Statement, in that individual impacts are considered but, in many cases, the overall combined impact is not. As such, it is difficult for the Council to conclude, in some topic areas, whether the proposals can be considered appropriate.
11. As noted above, the Council recognises the wider contribution that a new nuclear power station would make to the national energy strategy and the Council would welcome the benefits to Suffolk in terms of jobs, skills, and legacy. That contribution and those benefits would be capable of being delivered by the current proposals, but in the Council's view that would also be the case for a modified proposal that satisfactorily addressed the concerns outlined above. Consequently, the Council is not persuaded that the positive elements of the current proposals as they stand today are sufficient to outweigh or over-ride the negative factors that have been identified by the Council. Those positive elements would not be lost if the proposals were revised to address the Council's concerns.
12. Based on its concerns, the Council expects the following topics (in no particular order) to be carefully considered during the examination (with fuller detail on each topic area being provided in the main body of the Relevant Representation below):
- a) Impacts on Suffolk's transport infrastructure, from a significant increase of Heavy Goods Vehicles (HGVs), Abnormal Indivisible Loads (AILs), buses, Light Goods Vehicles (LGVs) and cars on the A12 and other local roads, noting that in the final proposals, only up to 40% of materials are to be transported by rail or sea, with more than 60% by HGVs (noting that, despite reference to a 40% target for rail, the DCO materials indicate that

significantly less than 40% of materials will actually be rail hauled). The concerns in this topic area include:

- i) The high reliance on transport of materials by road as part of the proposed “Integrated” freight management proposal, a solution that is in effect a partially mitigated road led solution. An increased proportion of rail transport and potentially sea-borne transport could, in the Council’s opinion, be reasonably achieved; as such we do not consider the current proposals to be a sustainable transport solution;
  - ii) Maximising rail and sea deliveries, with legally binding provisions of maximum proportions of materials brought to site by road;
  - iii) Measures to make the overall transport approach as sustainable as reasonably achievable, in relation to carbon emissions, air quality, community and natural environment impacts;
  - iv) The need for robust monitoring with enforceable caps on HGV numbers and other key transport indicators;
  - v) Timely implementation of the associated works designed to mitigate transport impacts;
  - vi) Mitigation of transport impacts on the highway network to acceptable levels for the community, including the need for more highway safety, capacity and community severance measures than suggested, along the A12, B1078, various rural roads and through Little Glemham, Marlesford, Wickham Market and Leiston (see paragraph 33 below);
  - vii) Whether the Sizewell Link Road should not be permanent and instead be removed after Sizewell C construction is completed;
  - viii) Consideration of the transport impact on the emergency services’ response times;
  - ix) The need to phase implementation / delivery of highway improvements to avoid disruption to the additional Sizewell C traffic;
  - x) Mitigation for transport related community impacts;
  - xi) Night-time impacts of rail and HGV movements;
  - xii) Suitable Public Rights of Way and cycling mitigation and improvements.
- b) Impacts on the landscape and natural environment which is of national and international importance and sensitivity. The Council remains concerned that the impact on the natural environment has not – and cannot – be fully mitigated. This topic area includes:
- i) Ecology and biodiversity – impacts on European Protected Species and Suffolk Priority Species and Habitats, requiring both on- and offsite mitigation;

- ii) Impacts on Sizewell Marshes SSSI (including causeway proposals) and other habitats, and the need for further mitigation/compensation;
  - iii) Ecological monitoring and contingency strategies;
  - iv) Landscape and visual effects and mitigating residual impacts; including possible alternatives to the pylon proposals;
  - v) Inadequate proposals for mitigating and offsetting the landscape impacts both within and beyond the nationally designated landscape, putting the purposes of the AONB designation at risk;
  - vi) Other impacts on AONB special qualities, including the location of an outage car park in the AONB;
  - vii) Coastal processes – impacts, monitoring and contingency bond;
  - viii) Ecological and landscape impacts of the Associated Development sites;
  - ix) Mitigation and compensation packages for the residual natural environment impacts expected from the construction, operation and decommissioning of Sizewell C.
- c) Dealing with the socio-economic impacts: Securing positive impacts of the development for employment and skills in Suffolk, as well as dealing with negative impacts on the economy and community. This topic area includes:
- i) Investment in skills and inspiration;
  - ii) Securing local employment opportunities and local business opportunities in the supply chain;
  - iii) Mitigation of displacement effects in the labour market;
  - iv) Impacts on and mitigation for the tourism industry and the wider Suffolk coast tourism offer;
  - v) Accommodation and housing market impacts;
  - vi) Community safety impacts resulting from the non-home-based workforce;
  - vii) Mitigating impacts on public services, including impacts on health provisions, social care, schools and early years provision;
  - viii) Fire & Rescue service impacts and impacts on other emergency services;
  - ix) Residual community impacts / Community funding.
- d) Other topics that the Council wishes to see considered in the examination include:
- i) Flood risk and surface water drainage issues for all sites both during construction and, where relevant, during operation;

- ii) Potable water supply - the impacts of the options have not to date been fully defined or assessed by the applicant;
  - iii) Air quality, noise, vibration;
  - iv) Mitigation for Leiston Recycling Centre on Lovers Lane.
- e) In addition, there remains lack of clarity on the following issues, though these may be resolved in advance of the examination, including:
- i) Emergency planning provisions;
  - ii) Archaeological provisions;
  - iii) Implementation contingency funding;
  - iv) Site remediation bond;
  - v) Cumulative impacts;
  - vi) Monitoring approach;
  - vii) Discharging responsibilities / Protective Provision.
13. A glossary of acronyms can be found at the end of this document.



## DETAILS ON THE AREAS OF CONCERN

### Transport

14. The Council expects the applicant to implement the most sustainable transport solution possible for the construction of Sizewell C, considering national and local policies as well as in response to the climate emergency. A considerable environmental impact from transporting materials and workers to and from the site is unavoidable given the scale of the project, but the impact needs to be minimised as much as possible, and comprehensive residual mitigation needs to be considered.
15. The Council does not support the applicant's proposed freight transport strategy, due to the fact that (1) it is not a sustainable strategy, because an increased proportion of rail transport (and potentially sea-borne transport) could be reasonably achievable, and (2) it does not currently mitigate its transport impacts on the highway network to acceptable levels for the community.
16. **Freight transport strategy:** The proposal put forward by the applicant relies heavily on HGV deliveries of materials, with more than 61% of materials due to be transported by HGV, and only up to 38% by rail and the delivery of a limited number of Abnormal Indivisible Loads (AILs) by sea. It should be noted that the materials plan shows significantly less than 40% of materials are proposed to be rail hauled. In comparison, for the proposed new nuclear power station at Wylfa, it is proposed that only up to 40% of materials would be delivered by HGV (with 60% by sea and an aspiration to increase this to 80%). As a result of its HGV-reliant strategy, Sizewell C models significantly higher peak two-way HGV movements to/from the main development site than proposed for Wylfa or for the nuclear power station at Hinkley Point C currently under construction. The table below compares the expected HGV movements at peak for the three sites.

		Sizewell C	Wylfa	Hinkley Point C
Peak Two Way HGV movements to/from the main development site.	Average	660 HGVs	320 HGVs	500 HGVs
	Busiest day	1,000 HGVs	~ 480 HGVs <sup>1</sup>	750 HGVs

<sup>1</sup> Assuming 50% increase for busiest day as per other projects

17. It should be noted that, due to the distance of Sizewell C to the Strategic Road Network being noticeably greater than either at Wylfa or Hinkley Point C [see table below for comparative distances], any HGV traffic will place greater strain on the local road network in Suffolk, including greater potential for light vehicles to divert away from the main access roads (A12 and B1122). The route to Sizewell C passes through several settlements such as Yoxford, Little Glemham and Marlesford, and significantly goes very close to a number of larger urban areas, Martlesham and Woodbridge. In comparison, whilst the route from the M5 to Hinkley Point C passes through the suburbs of Bridgewater, and it is noticeable that the main route to Wylfa passes few some villages but no significant urban areas.

	Sizewell C	Wylfa	Hinkley Point C	
Distance from SRN to main site	A14	A55	M5 J23	M5 J24
	47km	20km	21km	19km
MRN or A class roads	A12	A5025	A39	
	36km	19km	11km	9km
Local Road network	11km	1km	10km	10km

18. National Planning Policy, through the overarching National Policy Statement EN-1, states that, for Nationally Significant Infrastructure Projects (NSIPs), an aim should be “to secure more sustainable patterns of transport development when considering mitigation measures”, that “water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective”, and that “adverse impacts on transport networks arising from the development” should be mitigated<sup>2</sup>. The National Planning Policy Framework<sup>3</sup> states an expectation that developments should promote sustainable transport modes (defined as means of transport with overall low impact on the environment). The Council does not consider the applicant’s freight transport strategy to be sustainable and believes that an increased proportion of rail transport, and potentially water-borne transport, would be reasonably achievable. With rail- and marine-led options having been proposed by the applicant in pre-submission consultations but discarded without full justification, it is clear that there would have been more sustainable options available, but opportunities have not been taken up by the applicant to fully pursue more sustainable approaches to transporting materials.
19. We ask the Examining Authority to consider the transport proposals against national policies requiring sustainable transport solutions and transport strategies accepted for similar consented projects.
20. With the proposals submitted as part of the DCO having moved further freight transport onto HGVs, the construction traffic volumes on roads will be even

<sup>2</sup> National Policy Statement for Energy EN-1. Paras 5.13.9, 5.13.10 and 5.13.6

<sup>3</sup> National Planning Policy Framework. §9

more disruptive to communities and businesses across a wide area of Suffolk. The greater number of HGVs from the proposed “Integrated Strategy” (which is basically a road-based strategy which has not maximised rail or sea transport) means that greater road mitigation is required than would have perhaps been the case with a rail-led freight transport strategy - particularly the additional need for the Sizewell Link Road (the applicant considered at its Stage 3 and 4 consultations that the Sizewell Link Road may not be required if the rail-led proposal was implemented), which has its own associated environmental impact that could have been avoided with a more sustainable strategy.

21. We note that the applicant has moved during every stage of consultation of the project further away from sustainable solutions (with marine-led and rail-led proposals included in Stage 1 and 2, which was then reduced to a rail-led proposal or the alternative of a road-led solution in Stage 3, and the options of either a rail-led, an “integrated” or a road-led solution in Stage 4), with limited evidence that these options were seriously pursued, to the submitted road-based “integrated” solution with some rail and limited marine deliveries.
22. We have still not seen convincing evidence that a marine transport strategy, with the construction of a jetty as proposed at Stage 2, would not have been possible or cost effective, and that an increase of sea-borne transportation of materials is not possible. This may be achievable even within the submitted proposals by increasing the use of the Beach Landing Facility.
23. The discarding of the rail-led strategy has not been robustly justified, and the Council strongly notes its disappointment that the applicant has missed opportunities over the past two years to work with Network Rail to further pursue a rail-led approach (as proposed in Stage 2, 3 and 4), with upgrades to the East Suffolk Line. The rail-led strategy proposed previously would have resulted in allowing a minimum of five rail deliveries per day (which would all have been at day-time), compared to the now proposed three rail deliveries per day, most at night-time. The upgrades to the East Suffolk Line previously proposed under the rail-led approach would also offer a real legacy benefit of the scheme, supporting long term aspirations for the line.
24. The Council commissioned advice from transport consultants Aecom and Cadenza on options to increase rail deliveries in the applicant’s proposal<sup>4</sup>. It is clear from this advice that there are realistically deliverable options for an increased share of rail deliveries that warrant full exploration, including, within the current proposals, the use of longer freight trains, increasing the number of train deliveries at night time from three to potentially five trains and delivering deliveries by rail 7 days per week, and, with amendments, the potential to fast track or make alternative rail improvements to allow for more daytime rail movements than currently proposed. This technical report has been supplied to the applicant for its consideration and further discussions with the applicant and Network Rail in response to this report are awaited. On the basis of the findings of this report, the Council considers that there is every expectation that a considerably higher proportion of materials can reasonably be delivered by rail, and that enhanced rail transport solutions to the one proposed by the

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<sup>4</sup> Available at <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects/sizewell-c-nuclear-power-plant/>

applicant can and should be pursued. The Council asks the Examining Authority to continue to fully explore whether changes could be made that would allow a greater proportion of traffic to use rail and sea.

25. If the Examining Authority acknowledges the applicant's "Integrated" freight transport strategy as it stands as an acceptable approach, the Council expects to see every effort made to make that transport strategy as sustainable as possible and mitigating its transport impacts on the highway network to acceptable levels; by maximising rail deliveries and ensuring legally binding provisions are in place requiring the maximum proportions of materials to be brought to site by rail. A wide range of additional mitigation measures should be pursued by the applicant to make the overall transport approach more sustainable and mitigate its transport impacts on the highway network to acceptable levels, by for example by:
- Maximising the tonnage of freight to be delivered by rail and sea;
  - Reducing carbon emissions and improving air quality, such as by promoting low carbon initiatives, including electric cars, cycle and buses for the applicant's workforce and reduced emission freight transport;
  - Mitigating community impact through means such as triple glazing or safer road crossings;
  - Additional highway improvements (see paragraph 33);
  - promoting sustainable transport modes including improvements to the Public Rights of Way and cycling infrastructure and an aspirational travel plan;
  - Mitigation for residual impacts for communities along transport corridors through funding initiatives.
26. ***Environmental Statement and Assessment of Transport Impacts:*** Whilst the Council recognises that the methods used to assess environmental impacts of transport are commonly used by industry, they remain in their application a coarse tool that masks impacts, given that the criteria for different "Magnitudes of Impacts" are so wide. This means that large impacts can go unnoticed as they fail to trigger a somewhat arbitrary threshold, whilst in some cases smaller less noticeable impacts may result in a certain "Magnitude of Impact" being triggered. The assessment has failed to pick up the impacts of delays associated with AILs, both on general traffic and on emergency vehicle response times. To be able to respond to such unforeseen impacts that this form of high-level assessment may fail to identify, the Council expects a substantial contingency pot to draw down from to address such impacts.
27. It should be noted that the assessment method, including the transport modelling, has not been agreed by the Council at this point, and so all impacts set out are those identified by the applicant only. The Council cannot accept several conclusions currently being drawn by the applicant in several areas, particularly impacts to driver delays. The applicant continues to refine the transport model, aiming to make it acceptable to forecast traffic movements and hence realistic worst-case impacts for assessment in the Environmental

Statement. Therefore, whilst the Council has been working closely with the applicant on this matter, it is possible that additional transport related impacts may be identified before the examination, as a result of possible changes to the model. If applicable, these will be included within the Local Impact Report or Written Representations. The Council is concerned that other data such as the profile of workers, visitors, HGV, LGV and car movements over the duration of the project has not been submitted in the DCO making full analysis of impacts difficult.

28. **Controls, monitoring and contingency funding:** Due to the great impact of HGV and AIL traffic on Suffolk's communities and environment, the Local Highway Authority expects robust provision to manage the HGV traffic and AILs to the main development site and Associated Development sites. This needs to include HGV and AIL caps (controls) reflecting reasonable worst-case scenarios which were used to determine the impacts in the Environmental Statement, as well as monitoring and enforcement to ensure these are not exceeded. The Council considers that additional controls and monitoring are required in the Construction Traffic Management Plan (CTMP) and Construction Worker Travel Plan (CWTP) to ensure that construction workers use sustainable transport modes. The presumed high occupancy of the main campus accommodation and caravan accommodation at the Land East of Eastlands Industrial Estate (LEEIE) will require monitoring as if lower than forecast in the transport model, this could significantly increase worker trips. Controls are required for bus movements and monitoring of light vehicle movements to the main development site and Park and Ride sites to ensure that impacts do not exceed those assessed in both the Early Years and Peak Years of construction. In addition, controls and measures to deal responsively with problems associated with informal "fly-parking" that have been seen at the Hinkley Point C construction need to be in place. A contingency fund should be made available to address impacts arising that have not been predicted as part of the DCO and its Environmental Statement.
29. The submission documents suggest delivery of the associated highway developments according to the implementation plan only *as far as reasonably practical*. Any delays expose the transport system to a risk that the traffic volumes will exceed those forecasts in the early years scenario without mitigation being in place; and thus, the impacts could be greater than stated in the Environmental Statement. The Council would seek to limit traffic volumes to any agreed early year figures until the associated developments are available for use.
30. The currently presented outline transport management plans (Code of Construction Practice (CoCP), Construction Traffic Management Plan (OCTMP), Transport Incident Management Plan (OTIMP), Construction Worker Travel Plan (CWTP)) are not robust enough and require more controls, including aforementioned HGV controls, relevant monitoring of Sizewell C related workforce traffic and time restrictions for HGVs on the whole Suffolk

network. It is noted that the current proposals for controls within the DCO fall far below those agreed for Hinkley Point C.

31. A Transport contingency fund is required to assist with compliance and deal with unplanned impacts and impacts which were not forecast or identified in the transport assessment.
32. **Additional road improvements:** The Council expects that the construction of the project will be, in a number of locations, detrimental to highway safety, highway capacity and will increase environmental impacts of road traffic such as severance, delay and fear and intimidation in a number of communities. Such impacts are expected along the A12, the B1122 prior to the delivery of mitigation, the B1078, specific rural roads, roads in Leiston and Wickham Market, and to a lesser extent the A14. The impacts have been further exacerbated with the applicant having moved away from a rail-led freight transport solution, with resulting additional increases in expected HGV movements.
33. Whilst some road improvements are proposed by the applicant, these are not considered to be comprehensive, and the Council requires a more substantial highway improvement package from and funded by the applicant for mitigation that covers further junction improvements, local impacts such as severance, and for capacity improvements. The Council also expects the Transport Review Group (TRG) to have funding provided to address additional unforeseen impacts that arise during the construction period and for sustainable transport improvements to support the Construction Workforce Travel Plan (CWTP). Locations that the Council considers are likely to require additional improvements include the following (noting that further work is still undertaken by the Council on the transport assessment, and that the final modelling data has yet to be provided and the impacts fully understood which may identify further locations or works):
  - i) Mitigation fund for impacts on the highway network to the east of the A12; most notably the two A1094 / B1069 junctions, but inclusive of other unforeseen impacts;
  - ii) Mitigation for the B1125 through Westleton and Middleton because of environmental and community impacts – including local pedestrian and cycle improvements;
  - iii) Mitigation for impacts of construction and operational traffic in Leiston;
  - iv) Mitigation for the A1120 through Yoxford because of environmental and community impacts – including local pedestrian and cycle improvements;
  - v) Mitigation for the B1122 prior to delivery of the Sizewell Link Road – including local pedestrian and cycle improvements / infrastructure;
  - vi) Highway capacity improvements for the A12 corridor between the A1152 and A14. This includes mitigation to the Sizewell C traffic impacts on the A12 south of Woodbridge. The modelling appears to show that congestion in this area diverts traffic of all classes of local traffic onto other routes e.g. B1078, A1120, B1438 and A1152/B1069. Additional improvements to the A12 corridor would, to an extent, mitigate this diversion and avoid issues such as congestion, poor air quality and severance on these other routes;

- vii) Mitigation for the A12/Woodbridge Road junction at Bredfield because of delays on the side road exit causing driver frustration with increased risk of collisions;
  - viii) Mitigation for the A12 at Little Glemham and Marlesford because of environmental and community impacts - including local pedestrian and cycle improvements;
  - ix) Mitigation for the significant impacts at the B1078 / B1079 - sufficient funding needs to be in place for this corridor;
  - x) Mitigation for the A12 at Blythburgh - including local pedestrian and cycle improvements;
  - xi) Mitigation of impacts in Saxmundham and adjacent junctions on the A12 and the B1119 towards Leiston.
34. For Wickham Market and Leiston, the Council expects an agreed and costed formal mitigation package that is acceptable to the Council as well as the local parish / town council.
35. **Transport related associated developments:** The Council supports the principle of a Freight Management Facility and the two Park and Ride Facilities (plus the early years Park and Ride facility).
36. In respect of the specific site proposals, the Environmental Statement identifies several impacts. The Council will be seeking through the Examination process to ensure that those impacts – including landscape and visual, ecological, archaeological and surface water drainage related – are taken account of and appropriately mitigated in the detailed design, and that this is adequately secured through the discharge of any related requirements. The Council is in particular aware of local concerns around landscape impacts at the Southern Park and Ride site. The Council will provide further comments on all Associated Development sites in our Local Impact Report and seek improvements and mitigation of any impact where it may exist.
37. The Council is not convinced why the applicant does not use Darsham railway station, adjacent to the Darsham Park and Ride Facility, as the main transfer point to bus shuttles for worker arriving by rail, but instead propose using Saxmundham Railway station with its constrained forecourt and access.
38. The location of the proposed Freight Management Site to the east of the Orwell Bridge reduces its ability to manage construction traffic when incidents occur at the Orwell Bridge. The chosen location also generates additional traffic movements at Seven Hills Interchange which has limited spare capacity at peak periods. Details of the operation of the incident management area in the Southern Park and Ride have not been provided so the Council cannot comment on the effectiveness of this as a mitigation measure.
39. The associated works as proposed will lead to a slight loss in existing layby capacity on the A12, but more importantly the proposed lack of adequate controls for HGVs on the local road network is likely to lead to greater demand

for such parking facilities and overspill into less suitable areas of highway, contrary to the NPS<sup>5</sup>.

40. **Sizewell Link road:** The route selection for the Sizewell Link road has not, in the Council's opinion, been robustly justified, with alternative routes further south referred to by the applicant in its Stage 3 consultation likely to offer a better transport solution with more legacy benefits for Leiston.
41. Whilst the Council considers a new Link Road necessary to mitigate the impacts of **construction** traffic, it does not consider the Sizewell Link Road with its proposed routeing to have strategic legacy benefit **after construction**, as the proposed route runs parallel to an existing road (the existing B1122) which would appear to be suitable for the operational traffic of Sizewell C. A new permanent road would have a permanent detrimental impact on landscape and ecology, would result in permanent loss of agricultural land (predominantly grade 2 and 3), and would place an additional maintenance burden on the highway authority. Therefore, the Council's preference is for the Sizewell Link Road to be removed on completion of the Sizewell C project, to minimise long term environmental damage in the area.
42. If the Examining Authority disagrees with the Council's position and concludes that the Sizewell Link Road should be retained, the Council would expect to see clear provision for funding to downgrade the current B1122 to become a quiet road, used by limited local vehicular traffic with priority given to walking and cycling with appropriate measures to create cycling connectivity to the surrounding area, appropriate arrangements and standards for the adoption of the Link Road in due course, and commuted sums for maintenance by the Council. Satisfactory detailed designs, with suitable ecological and landscape mitigation, Public Right of Way diversions and mitigations and drainage proposals, would be required.
43. **Two-Village bypass:** The Council supports this scheme and considers the proposed route to be the least-worst option, subject to satisfactory detailed design and mitigation for ecology, noise, historic environment and public rights of way, and the adoption of the road to be delayed until the end of the Sizewell C construction.
44. The scheme will result in the permanent loss of 2.91ha of floodplain grazing marsh, a UK Priority habitat. No compensation is currently proposed for the loss of Floodplain Grazing Marsh – the Council expects that compensation must be provided. The Council has some concern about the impact of the two-village bypass on Foxburrow Wood County Wildlife Site (CWS), which is adjacent to the proposed route. Whilst the Environmental Statement recognises the importance of the wood, the Council requires further work on impact and mitigation for the stress on the woodland edge during construction and operation.
45. **Green Rail Route:** The Council supports the proposal for direct rail access into the main development site (the "Green Rail Route") as it removes rail movements and unloading activity (proposed primarily at night-time) from the centre of Leiston, subject to noise and surface water drainage/flooding impacts

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<sup>5</sup> Overarching National Policy Statement for Energy EN-1. Para. 5.13.11



being satisfactorily addressed. It is expected that the Green Rail Route is temporary and should be removed and reinstated as soon as practical after completion of construction of the power station.

46. **Noise, vibration and air quality impacts of rail movements:** The Council does not think that the applicant has sufficiently considered and addressed the noise and vibration impact of rail movements on local communities, particularly at night-time.
47. Currently, there are no night-time rail movements on the East Suffolk Line or Leiston branch line. The applicant proposes during construction five night-time and one day-time rail movements. The rail route passes very close to significant residential areas, most notably (from South to the site) Ipswich, Westerfield, Woodbridge, Melton, Saxmundham and, in the early years before construction of the new branch line into the construction site, Leiston. The applicant assessed that there would be only 40-50 properties where noise levels would exceed the Significant Observed Adverse Effect Level (SOEL), which the Council believes is likely to be underestimation. The proposed mitigation measures are insufficient.
48. In addition, in the early years freight will be unloaded at the East of Eastlands Industrial Estate at night time; the impact of this may have been underestimated and will require further mitigation and justification in terms of the noise impact on Leiston and surrounding residential dwellings.
49. Further information is required about emissions from freight trains, including from idling train engines. The Council understands from its air quality consultants that this is unlikely to be of a scale to require additional air quality mitigation but this needs to be confirmed.
50. **Noise, vibration and air quality impacts of HGV / Road Transport Movements:** The large number of additional HGVs will significantly impact local communities, in terms of noise, vibration and air quality. Roads are currently very quiet at night-time, with an increase of HGVs at night-time (or in the late hours of evening and early hours of the morning) being very noticeable. The main HGV route passes several significant residential areas which are not proposed to be included in mitigation, including Yoxford, Little Glemham, Marlesford, Woodbridge and Martlesham. The Council expects additional mitigation and compensation to be required for these locations. The Council has some concern that the applicant proposes the timing of HGV movements being controlled at the main gate only and hence, whilst times of arrival and departure would be controlled, HGVs would be free to travel through local communities at any time of the day or night.
51. The applicant should commit to further reduce road traffic air quality impacts by requiring lower emission construction vehicles, HGVs and buses, of Euro VI – currently, the applicant has only committed to Euro V emissions standards for HGVs. This requirement should be balanced against the desirability of using local contractors where possible, if this results in limitations on the availability of HGVs with the highest emissions standards. A clear monitoring and enforcement regime is required for this matter.
52. The Council is particularly concerned about the emissions impacts and the robustness of the related assessments within the Stratford St Andrew Air

Quality Management Area (AQMA), especially in the early years before completion of the two-village bypass. The Council has concerns that the impact has been under-reported, both during the Sizewell C-only and cumulative scenario with East Anglia 1 North (EA1N) and East Anglia 2 (EA2) constructed concurrently. Measures should be taken to ensure that air quality in this location is not worsened, by carrying out a robust and conservative assessment which reflects the construction vehicle fleet, and by providing suitable controls within the management plans combined with a robust monitoring system. The potential for local traffic to divert onto local roads due to congestion on the A12 is considered to pose a significant risk for an increase in emissions at the Woodbridge AQMA or an excess of thresholds in other areas, for example the A1152 / B1438 Melton crossroads.

53. **Appropriate mitigation package for transport related community impacts:** Due to the expected residual impact of transport on local communities (including impacts from traffic volumes, noise and vibration from road and rail transport, on health and wellbeing, quality of life, community severance and general community wellbeing), the Council considers the applicant needs to provide a mitigation package for such residual impacts in support of affected communities. This should be made available to all affected communities along the main transport corridors (both road and rail) and near the Associated Development sites (such as Wickham Market and the surrounding parishes being affected by transport impacts related to the Park and Ride site).
54. **Maintenance contribution to Highways:** The Council expects appropriate levels of maintenance contribution for all affected highways; this has not been confirmed yet by the applicant. Maintenance may have to occur at night-time as the construction traffic will make it disruptive to program maintenance works on the A12 and B1122 / SLR in daytime off peak hours. The Council also considers that the volume of HGV traffic will result in significant structural damage to local roads with resultant delays for essential maintenance and additional costs for the authority which needs to be covered by the applicant.
55. **Public rights of way and cycling provision:** The Council expects comprehensive mitigation for temporary closures of all public rights of way and the Coast Path.
56. With regard to the Coast Path and the adjacent public footpath 21, further improvements to the proposed alternative inland route during coastal path closures have to be made. The current proposal does not provide a safe and suitable diversion for the coastal path when it is closed, for construction of the sea defences and the beach landing facility and subsequent use of the Beach Landing Facility. Specifically, in current proposals, diverted pedestrians will be required to use Eastbridge Road north of Bridleway (BR) 19, a narrow lane without footways or verges. Further measures are required to address these concerns. The Public Right of Way along the beach needs to be designed for

its availability in the long term, so should not be located on the sacrificial sea defence, but on top of the hard sea defence.

57. Public Rights of Way need to be secured in the long term, including linking Kenton Hills to Aldhurst Farm, and Kenton Hills to the coast once construction is completed.
58. Detail of Public Right of Way realignments and improvements, for the areas around the main development site, the rail link between Saxmundham and the development site, and all the Associated Development sites need still to be resolved to the Council's satisfaction.
59. A comprehensive package should mitigate the wider impacts on Public Right of Way and amenity and recreation. The Council seeks a package of Public Rights of Way and cycle infrastructure improvements in the wider area around Sizewell C, as well as, where appropriate, along its transport corridors and near its Associated Development sites. Such a package should be aimed to encourage workers to walk or cycle to the construction and operational site, and for construction workers to enjoy the recreational health benefits provided by Public Rights of Way and cycling. It should equally aim to mitigate the tourism and local amenity impacts and to reduce overall carbon emissions and environmental impact in the local area through other users, to respond to the non-sustainable freight transport solution by the applicant.

### Impacts on the natural environment

60. The development site is in a location of highest environmental sensitivity in a landscape and natural environment of national and international importance and sensitivity, including RSPB Minsmere and the Suffolk Coast and Heath Area of Outstanding Natural Beauty (AONB). The potential landscape and biodiversity impacts were highlighted in the National Planning Statement (NPS) 6 Vol II<sup>6</sup>. Given these environmental sensitivities, the Council has always advocated that the applicant must seek to deliver Sizewell C in a manner which can be described as an environmental exemplar, following the mitigation hierarchy and achieving biodiversity enhancement. In response to the biodiversity emergency we are facing, safeguarding and enhancing the biodiversity of this special natural environment is now even more important. The Council remains concerned that the impact on the natural environment cannot be fully mitigated and that the proposals as they stand do not mitigate those impacts to the greatest extent reasonably achievable.
61. **Ecological assessments and mitigation:** Ecological assessments provided by the applicant remain incomplete, particularly for the Associated Development sites, and some of the data and reports for the main development site are old. For example, some surveys relied on in the Environmental Statement for bats<sup>7</sup> and plants and habitats<sup>8</sup> are from 2012 and some

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<sup>6</sup> As identified in: National Policy Statement for Nuclear Power Generation (EN-6), Vol 2, Annex C, pp. 206-209

<sup>7</sup> Book 6.3, Main Development Site Environmental Statement, Chapter 14: Terrestrial Ecology and Ornithology, Appendix 14A8: Bats.

<sup>8</sup> Book 6.3, Main Development Site Environmental Statement, Chapter 14: Terrestrial Ecology and Ornithology, Appendix 14A3: Plants and Habitats.

invertebrate surveys date back to 2010<sup>9</sup>. Given its location in a highly sensitive landscape, there will be a significant impact on both protected species and local species, which the Council believes can in any case be only partially mitigated through further embedded mitigation.

62. Much of the ecological mitigation relies on Aldhurst Farm, as a key proposed (and already established) mitigation site. Whilst the ecological mitigation at Aldhurst Farm is welcome and supported, the ecological carrying capacity of this mitigation site is being over-estimated and is compromised by public access and the lack of ecological connectivity to the Sizewell Marshes SSSI underneath Lovers' Lane.
63. The Council notes that any ecological mitigation measures need to be in place in advance of significant impacts occurring. Many are not currently in place.
64. The Council expects there to be residual impacts on the ecology after mitigation, which will need to be recognised through wider mitigation and compensation packages.
65. **Shadow Habitats Regulation Assessment (HRA):** The Council is concerned that the proposals may result in long lasting damage to habitats which have not been fully recognised or mitigated by the applicant. In this context, the Council recognises Natural England's responsibility to give the definitive view on the Shadow HRA, and they will be better placed to further comment on the specific species affected.
66. For the applicant to use the IROPI (Imperative Reasons of Overriding Public Importance) option, it must demonstrate "...compensatory measures must be demonstrated to be available and deliverable..."<sup>10</sup>. The Council is concerned that, for the reasons stated elsewhere in this document, compensation for the Special Protection Areas (SPAs)/ Special Areas of Conservation (SACs) features may not be available or deliverable. For example, for Marsh Harriers, a species vulnerable to displacement by noise, light and construction, mitigation habitat has been identified, yet only high-quality monitoring can confirm the suitability of this. For Harbour Porpoise, the Council considers there to be a likely impact from the, on the worst days, over 3,400 kg of fish being interred by the cooling system and the resulting spread of dead and dying fish over 5 hectares of Sizewell Bay; however the applicant concludes "no adverse effect", with no proposals to mitigate or compensate for this impact. Disturbance to wildfowl and waders is acknowledged (these are SPA features for the nearby Estuaries), but the applicant does not consider this to be a significant impact that requires mitigation. The Council concludes that further assessment, mitigation and compensation will be required, complemented by a robust

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<sup>9</sup> Book 6.3, Main Development Site Environmental Statement, Chapter 14: Terrestrial Ecology and Ornithology, Appendix 14A4: Invertebrates.

<sup>10</sup> Book 5.10, Shadow Habitats Regulation Assessment Report, Volume 1: Screening and Appropriate Assessment. Para 3.5.2

monitoring regime with structures and funding in place to undertake any necessary remedial mitigation works.

67. The Council disagrees with the statement<sup>11</sup> that the Suffolk Coast RAMS (Recreational Disturbance Avoidance and Mitigation Strategy) is not directly applicable to the Sizewell C project, given that the application includes the housing of 2,400 workers in an onsite campus and 600 in a caravan site, for the construction period (9-12 years). Whilst it is accepted that some mitigation will be achieved through the delivery of alternative recreational opportunities as part of the development, the Sizewell C project will still add to the recreational pressure on European designated sites. This will require addressing in the form of a strategic mitigation package delivered as part of the Suffolk Coast RAMS through financial contributions by the applicant, to avoid adverse effects on the integrity of European designated sites through in-combination increased recreational disturbance as a result of the development.
68. **Impacts on Sizewell Marshes Site of Special Scientific Interest (SSSI):** The Council strongly disagrees with the conclusion in the Environmental Statement that impacts on Sizewell Marshes SSSI are “Minor Adverse, Not Significant”. This conclusion appears to be based on onsite mitigation measures during construction and the delivery of compensation habitats at Aldhurst Farm (reedbed and ditches), Benhall (fen meadow and potentially wet woodland) and Halesworth (fen meadow and potentially wet woodland). However, the assessment does not recognise that it will be extremely challenging, if not impossible, to establish replacement habitats that would suitably compensate for the high-quality habitat that would be lost, in particular fen meadow. Whilst some wet woodland creation potential is identified, this is not sufficient to compensate for the wet woodland to be lost (2.6ha). The Council advocates that there should be recognition of this risk, by having robust contingency strategies for fen meadow and wet woodland mitigation as well as recognition of a likely residual impact that would need to be compensated for.
69. In the context of the Sizewell Marshes SSSI and the ecological system in the wider area, effective water level control and management will be crucial during the build as failure to monitor and control will lead to significant harm, as has been the case previously. Therefore, a robust monitoring and control scheme needs to be set up.
70. **SSSI Crossing:** The applicant’s proposals for a causeway to cross the Sizewell Marshes SSSI and the resulting ecological impact on this SSSI is of serious concern. A causeway design would have a much higher ecological impact than the alternative of a three-span bridge across the Sizewell Marshes SSSI (as was proposed as one option during the pre-submission consultations), as the causeway would involve a greater amount of direct land-take from the SSSI than a bridge option and would sever connectivity for species moving between Sizewell Marshes SSSI and Minsmere (particularly species such as water vole, birds and invertebrates, and including European Protected Species). The applicant has not provided convincing arguments of the need for a causeway option and the Council continues to seek replacing the causeway with a bridge

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<sup>11</sup> Book 5.10, Shadow Habitats Regulation Assessment Report, Volume 1: Screening and Appropriate Assessment. Para 7.7.94

design to reduce the ecological impact. The Council notes that the causeway option is also against the applicant's own design principles which includes to "seek to retain areas of habitat connectivity and continuity as far as possible", to "design the development (...) to minimise (...) severance of habitats, where reasonably practical", and to "minimise land take from the SSSI"<sup>12</sup>.

71. **Other impacted habitats:** Specific mitigation or compensation measures are required for the Sizewell Levels County Wildlife Site (CWS) and the Suffolk Shingle Beaches CWS (with its Vegetated Shingle Habitat likely to be "of national importance") (identified by the applicant as moderate adverse impact).
72. **Impacted species - bats:** The Council strongly disagrees with the applicant's conclusion that the impact on bat populations are considered "minor adverse, not significant", despite recognition of possible local population extinctions. Further habitat mitigation and compensation measures are needed to address this impact, including strengthening the available commuting and foraging habitats and the provision of additional roosting and hibernating opportunities. Together with East Suffolk Council, the Council has commissioned an expert investigation into the potential impacts on bats which will be fed into its written representations.
73. **Impacted species – water voles:** The Council strongly disagrees with the applicant's conclusion that the impact on water voles are considered "minor adverse, not significant". The fragmentation of populations by the proposed causeway to cross the SSSI (see paragraph 70) is significant, and the receptor site at Aldhurst Farm is much smaller than the amount of habitat lost from the SSSI. With no improvement to the culvert under Lovers Lane the existing fragmentation between Aldhurst Farm and the SSSI will be exacerbated. The applicant's proposals fail to address these impacts. Additional mitigation should be provided, and the ecological connectivity between Aldhurst Farm and the SSSI needs to be significantly improved.
74. **Impacted species - reptiles and Natterjack Toads:** The mitigation proposals seem more appropriate for these. The Council expects that suitable habitats will be created, managed and enhanced, with suitable monitoring programme and contingency funding.
75. **Suffolk Priority Habitats and Species:** Insufficient weight and mitigation is being given to these locally important features, and the Council expects additional suitable mitigation, monitoring and enhancement.
76. **Ecological monitoring:** There is inconclusive and incomplete evidence that the sensitive ecology, including at RSPB Minsmere, is not significantly affected, and that headline European Protected Species (bats, marsh harriers etc) and Suffolk Priority Species are not significantly affected as a result of the high intensity construction activities. The Council notes that there is still reliance on old data and reports for the conclusions made, and the applicant has not evidenced whether the age of the reports and data is sufficiently robust to verify the conclusions.
77. Therefore, the applicant has failed to establish an adequate understanding of the ecological baseline of the proposed development site. As a result, the

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<sup>12</sup> Book 8.1, Main Development Site Design and Access Statement. Table 5.1

Council considers the applicant's assessment of impacts over both the short-term (construction) and long-term (operational) lifetime of the project requires further evidence and justification. It is the Council's view that the likely impacts on species over the lifetime of the project will be far greater than the Environmental Statement claims. The applicant should use realistic "worst case scenarios" when assessing the environmental impacts, which the Council considers is not currently the case.

78. Once it is ensured that the Environmental Statement is considered adequate and all feasible embedded mitigation measures are being pursued, a transparent, robust, adaptive and comprehensive monitoring framework throughout the construction and operational lifetime of the development is essential. Monitoring needs to cover all ecological receptors with crossovers to other disciplines and permitting/licensing regimes covered and should be secured via the DCO/S106 (as appropriate). It is important that the ecological monitoring and mitigation strategy is adaptive to enable issues which arise during construction to be addressed. The Council notes the finding in Oxford-Brookes' "Study on the impacts of the early stage construction of the Hinkley Point C Nuclear Power Station" (2019)<sup>13</sup> that biophysical environmental impact monitoring information is not publicly available in a transparent way for the Hinkley Point C development. The study recommends monitoring and public reporting of actual performance against a full set of biophysical indicators/KPIs. Given that EN-6 has identified that there is a much more sensitive environment at Sizewell C and its surrounding area, robust monitoring will be essential.
79. Any monitoring proposal must ensure it is supported by a means to provide contingency funding should further work be required in response to monitoring.
80. **Landscape and Visual Effects:** Due to its prominent location in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the design of the power station and its impacts on the character and special qualities of the AONB have to be considered as of very high importance to the development. This has been identified in EN6 and its supporting documents and recognised in the applicant's Environmental Statement.
81. Significant adverse effects on visual amenity have been identified for several views from important local receptors. However, the applicant states that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during **operation** on these designations are therefore assessed as not significant. The Council disagrees with this conclusion, as the impact on the defined characteristics, in particular the coastal aspects, of the AONB designations within the locality of the main site are of notable significance, both at day- and night-time, and both during construction and operation.
82. The Council considers the applicant's proposals for mitigating and offsetting these landscape impacts both within and beyond the Nationally Designated Landscape as inadequate, given that the purposes of the AONB designation, i.e. conserving and enhancing natural beauty, in the areas around the

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<sup>13</sup> Impact Assessment Unit (IAU), Oxford Brookes University: Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station: Monitoring and Auditing Study Final Report (2019) available at <https://doi.org/10.24384/xeb3-7x48>

operational site are at risk. This includes inadequate consideration of embedded mitigation, specifically alternatives to the use of pylons, and insufficient control of detailed design issues in the DCO requirements commensurate with the sensitivity of the receiving environment and the scale and extent of residual impacts.

83. The Council accepts that the design of the nuclear reactor cannot be changed due to the need for compliance with the Generic Design Assessment (GDA), but the Council notes that the design of the Sizewell C nuclear domes will be inferior to the iconic design of the Sizewell B dome. The GDA design solution is driven by engineering considerations and replicability, and as such cannot respond to the sensitivities of the proposal site and its surroundings. This being the case the Council considers that the poor aesthetics of the nuclear buildings, and the consequent adverse impacts on the AONB need to be compensated for and offset over the lifetime of the power station.
84. The Council welcomes that the applicant has sought to reduce the impact of the major non-nuclear buildings, and notes that implementation of this design (as well as of the concrete finish of the reactor domes) needs to be legally enforceable. Further changes may be required to the requirements, Design and Access Statement or parameter plans to achieve this.
85. The proposals include four additional tall pylons with overhead lines on the development site for the power export connection, which would have considerable additional detrimental impact on the Suffolk Coast and Heaths AONB, by adding significant clutter to the design. In previous rounds of consultation, the applicant proposed to underground the cabling on site, but now considers that such an option is not possible. However, the Council remains unconvinced that other, less intrusive, alternatives without pylons are not achievable. The Council commissioned a review by technical experts, Pöyry Energy Limited (AFRY) into grid connection options<sup>14</sup>. This review indicates that the use of Gas Insulated Lines (GIL) to connect to the National Grid (NGET) substation is a feasible alternative to overhead lines and pylons, suggesting that this is a viable and less impactful alternative which has the highest availability/ reliability of all the options and has been used elsewhere in the context of nuclear power stations. This technical report has been supplied to the applicant for consideration and a response is awaited. On the basis of the findings of this report, the Council considers that there is every expectation that power export connection through pylons and overhead lines can be reasonably avoided without unacceptably exacerbating other environmental impacts, and that alternative solutions to the one proposed by the applicant can and should be pursued. The Council considers this essential, in order to reduce the adverse residual impact of the proposal on the character of the AONB and specifically on the statutory purposes of designation: to conserve and enhance natural beauty.
86. If it is concluded by the Examining Authority that there are no technically possible alternatives to the use of pylons, a significant compensation package

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<sup>14</sup> Available at <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects/sizewell-c-nuclear-power-plant/>



over the lifetime of the pylons would be important to compensate for their impact.

87. **Residual impact:** The Council strongly disagrees with the applicant's assessment that there will be "insignificant" residual effects on most areas of ecology and impact on the special qualities of the AONB, including by impacting on biodiversity, visual impacts, tranquillity and through potential increased coastal erosion. Considering the scale of development, the length of the construction period, and the complex sensitivities of the site, it can be expected that there will be significant residual impacts notwithstanding the embedded mitigation. The Council expects a very significant environment fund, with appropriate criteria and governance, over the lifetime of the power station (including construction, operation and decommissioning) to provide mitigation for these residual impacts.
88. **Outage car parking on Goose Hill:** The proposed staff car parking and outage car parking at Goose Hill represents additional permanent development within the AONB. The Council considers that there is no overriding need specifically for an outage car park in this location. Alternative solutions could include shared use of the Sizewell B outage car park (which is proposed to be relocated as part of the DCO), or a Park and Ride solution with a Park and Ride site in a less sensitive location.
89. **Ecological impacts of Associated Development sites:** Surveys for Associated Development sites are incomplete and rely on one, non-representative, season, therefore the Council considers that some of the impacts are underestimates. The Council is concerned that impacts on farmland birds such as Skylark have been scoped out, as have impacts on water voles. However, the Council considers impacts will occur that will need to be mitigated or compensated. Similarly, the impact on bats, particularly for the Sizewell Link Road, appears to be underestimated. We have commissioned expert consultants to clarify the true impact on bats, with reference to in-combination effects, which will be provided to the applicant in due course, and referred to in the Council's Written Representations.
90. **Sizewell Link Road:** The DCO documents propose that the Sizewell Link Road is to be retained permanently as a public highway. This inherently causes a greater permanent residual landscape and ecological impact than a temporary solution, as well as resulting in permanent loss of agricultural land. As there is no strategic transport case for permanent retention of the Sizewell Link Road (see transport section, paragraphs 40-42 above), the Council requests the road to be removed after the construction period.
91. **Coastal processes/ coastal geomorphology:** The Council is extremely concerned about the potential impacts of Sizewell C on coastal processes.
92. The Sizewell C platform is estimated to extend around 40m further seaward than the 'building line' established by Sizewell A and continued by Sizewell B (note that the Council understands that the actual position of the sea defence is still subject to final design). Particularly the hard, rock sea defence may have a significant and enduring negative effect when it is exposed by a naturally retreating shoreline. The applicant has identified that the hard coastal defence feature will probably become exposed and block the flow of sediment leading

to accretion, predominantly on the Minsmere (North) side, or erosion, predominantly on the Thorpeness (South) side, when compared with natural changes that would have occurred in a “No Sizewell C” scenario. The Council expects suitable mitigation plans to prevent or correct these departures from natural change.

93. The proposals include an artificial sand and shingle mound placed on and seaward of the rock defence, as embedded mitigation aiming to delay the negative impact of exposure of the rock defence. This will require active management informed by a comprehensive monitoring programme. It is predicted by the applicant to be effective until 2050 / 2080. The Council has some concern that, after this date, the applicant proposes secondary mitigation involving beach management by recycling, bypassing, and nourishment. Related to this, to ensure continued accessibility of the Public Right of Way along the sea front, the Council considers that the Public Right of Way should be located on top of the rock defence rather than on the sacrificial soft sea defence as currently proposed.
94. The proposed beach landing facility has the potential to further alter natural change trends in its locality and beyond. The risk is higher during use, as barge deliveries are likely to require dredging to create navigation access. As such, the risk will be greater during the construction phase than during operation when the beach landing facility will be dormant for the vast majority of the time. As a consequence, the shoreline and / or seabed profile would be subject to an unnatural change. The Fish Recovery & Return Outfalls and the Combined Drainage Outfall have some, limited, additional potential to cause unnatural change at the shoreline by interference with nearshore sandbars that are important sediment movement pathways. As agreed with the applicant, a comprehensive monitoring and mitigation programme for detection and management of such changes needs to be secured.
95. **Coastal Monitoring and Mitigation Plan (MMP):** The Council requires a comprehensive Monitoring and Mitigation Plan (MMP) to inform decisions on if and to what extent an observed coastal change in the Sizewell C zone of influence is attributable to the development and what responses are appropriate and required and fundable by the power station operator. This should be continued until final removal of the hard sea defence after decommissioning.
96. A precautionary principle should be applied to assumptions on potential future critical requirements. The applicant/operator needs to have plans and sufficient budgets in the form of bonds or similar in place to ensure continued implementation of the MMP, allowing for increasing investment demands to manage a progressively exposed hard sea defence, unless and until the hard sea defence is removed. If the site transfers to another owner, the new owner must be bound by covenant to adopt responsibility including costs for maintaining the MMP process.
97. An independent body should be assigned to monitor the MMP, with ‘legal’ standing if possible, to direct mitigation and compensation requirements from the owner of the site.
98. **Removal of hard sea defence:** The applicant suggests that mitigation will cease before the end of decommissioning, at around 2130. The development

life is forecast to end between 2160 and 2190 after removal of the spent fuel facility, thus the rock defence will be required for between 100 and 170 years to protect the development, at which point the rock defence will no longer be required to protect the site. However, the DCO proposes not to remove the Sizewell C coastal defence after decommissioning, unless required by the Pre-Decommissioning Environmental Impact Assessment. The Council does not consider this acceptable, and expects the Funded Decommissioning Programme to make provision for the cost of full removal of the hard sea defence as part of the decommissioning process, when safe to do so, unless and until a future study, informed by monitoring and other data, changes this position. Whilst the implications of an eternal hard sea defence projecting into the sea at this location cannot be predicted with certainty at this time, the Council believes that the risk of allowing a 800m long by 10m (or 14m high if its height is increased during the lifetime of the station) mainly rock headland to indefinitely remain at this location is unacceptable.

### **Socio-Economic impacts**

99. The Council welcomes the opportunities for employment and skills from the development for Suffolk, which have the real potential to create a positive long-lasting legacy in the county and region. The Council is supportive of the applicant's aspirations in this area. However, the Council remains concerned about negative impacts on tourism, the housing market and community safety.
100. ***Economic and skills benefit***
101. Notwithstanding our concerns expressed elsewhere in this Relevant Representation, the Council continues to welcome the opportunities for employment and skills in Suffolk from the development, which would have real potential to create a positive long-lasting legacy in the region. We are supportive of the applicant's aspirations, including those to maximise local employment, and the commitments and investments outlined in the DCO submission, as well as the applicant's intention to integrate with regional strategy and initiatives. If the detail on the strength of these commitments is forthcoming, with appropriate governance, and of a scope and at the level which the Council deems necessary, the development would undoubtedly provide many benefits for the local area including:
- significant numbers of local employment opportunities at all levels of the project – including for those furthest removed from the labour market;
  - enhancement of our existing local skills and training offer including the opportunity for development of future skills 'hubs';
  - enhancement of the competencies and capabilities of our local supply chains that will stimulate and facilitate further growth in our economy;
  - an enhanced inspiration offer, raising the ambitions and achievements of individuals across Suffolk.
102. These benefits would be capable of being delivered by the current proposals, but in the Council's view that would also be the case for a modified proposal that satisfactorily addressed the concerns outlined above. Consequently, the Council is not persuaded that the positive elements of the current proposals, as

they stand today, are sufficient to outweigh or over-ride the negative factors that have been identified by the Council. Those positive elements would not be lost if the proposals were revised to address the Council's concerns.

103. **Investment in skills and inspiration; employment opportunities:** The Council supports proposals to enhance the local skills training offer and increase skills levels, to raise aspiration and achievement levels of young people in particular in Science, Technology, Engineering, Maths and Computing (STEMC) subjects to create a future workforce, and to offer employment opportunities to young people, for example through apprenticeships. To ensure these aspirations are met, the Council expects flexible, sizeable skills and inspiration funds, with appropriate governance, as well as contingency funding. Whilst the DCO submission references proposals for such funds, more detail on volume, scope and governance is required to consider whether these are appropriate.
104. There are some concerns about the basis and rationale provided by the applicant for the ambitions and targets set for local employment, with insufficient clarity on commitments to local targets. The definition of a home-based worker remains unclear, and it is not clear why none of the uplift from 5600 to 7900 workers, proposed between Stage 2 and Stage 3 consultations, is expected to be home-based. The Council seeks to see stretching targets set based on investment, and commitment to measures that will create larger local talent pools for the higher paid jobs as well as the low paid jobs.
105. To move people from economic inactivity to becoming productive and economically active, as proposed by the applicant, requires significant investment in individuals through targeted skills and educational interventions. Whilst the Council welcomes the intention to build on existing local interventions, further capital and revenue investment will be required from the applicant to achieve these ambitions.
106. **Local business opportunities in the supply chain:** The DCO refers to the applicant's supply chain ambitions for local and regional businesses, however its strategy states that the Sizewell C project will aim to replicate many of the core elements of the Hinkley Point C supply chain including choice of contractors and contract structures, and explicitly states that key personnel and expertise will transfer from Hinkley Point C. This raises obvious concerns about the ability of Suffolk businesses to take advantage of Sizewell C supply chain opportunities, and seemingly contradicts the applicant's local/ regional supply chain ambitions for Sizewell C.
107. The Council seeks a formal commitment from the applicant with its tier 1 and tier 2 suppliers that explicitly states the need to consider, encourage and support local suppliers to benefit from contracts working on the project. This would provide greater credibility to the applicant's commitments in this area and would support securing local employment and economic benefit. The Council suggests that the applicant should monitor tenders to determine how much local/ regional engagement has taken place and adjust its strategy if this falls short of the applicant's aspirations in this field.
108. **Churn / displacement effects:** The Council considers there to be churn / displacement effects in other sectors as a result of high employment demand

for Sizewell which needs to be carefully managed and monitored – this is an area the DCO does not recognise, and thus the Council is in disagreement with the applicant on this matter. The Council looks for commitment by the applicant to measures, including a strong training/skills uplift programme, to mitigate churn / displacement effects. The Council is also concerned about the potential impact on public service resilience as a result of churn and displacement, i.e. loss of staff and upward wage pressure, and looks for the Public Services Resilience Fund (referenced below in paragraphs 116 ff.) to make allowances for mitigation funding for this impact.

109. **Economic costs of congestion:** It is expected that the transport impact on Suffolk’s highway network will have a residual cost impact on Suffolk’s business continuity, because of traffic delays and perception of Suffolk as a place not open for business. The Council requests this to be recognised through a fund to mitigate for the economic costs of congestion in Suffolk’s business continuity. Traffic delays may also have an impact on the Council’s own services, and this should be considered within the proposed Public Services Contingency/ Resilience Fund (referenced below in paragraphs 116 ff.).
110. **Tourism:** As evidenced by two separate tourism surveys, one carried out by the applicant and the other commissioned by the Suffolk Coast Ltd Destination Management Organisation (DMO) in 2019<sup>15</sup>, a negative perception impact on willingness to visit Suffolk is likely if the development goes ahead, with the DMO study concluding that the number of fewer people being prepared to consider visiting during the construction of Sizewell C and the other proposed energy developments could cost the local tourism sector at least £24 million per annum. The applicant has proposed a tourism fund to help mitigate negative impacts on tourism, and the Council considers that the findings of the DMO commissioned study are important evidence to justify scale and scope for such a fund. The applicant has not yet indicated scale, scope and governance arrangements, so the Council cannot yet indicate whether the proposals for the fund are appropriate and acceptable. The Council also wishes to see improvements to the sustainability of transport related proposals, such as improvements to cycle and Public Rights of Way infrastructure, which will improve the tourism offer as well.

The Council is concerned that additional workers servicing the Sizewell C development have the potential to overwhelm local tourist accommodation. Whilst to an extent this may be welcome to fill vacancies off-season, the Council notes that Suffolk has a year-round tourism offer and demand due to its natural environment and tranquillity which is particularly vulnerable to development pressure. Thus, the Council is concerned that the availability of accommodation supply for tourists will be adversely impacted by workers seeking accommodation, in all seasons. An element of the Housing Fund (see below) should be ring-fenced to ensure adequate housing supply for workers can be

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<sup>15</sup> BVA-BDRC: “The Energy Coast – Implications, impact and opportunities for tourism on the Suffolk coast”, 2019, available at <https://www.thesuffolkcoast.co.uk/tourism-research-and-reports>

made available without impact on the tourist visitor economy throughout the year.

111. **Accommodation impacts:** The Council supports the principle of an accommodation campus to house 2,400 workers and accepts that the proposed site adjacent to the main development site is the least worst option available. It is also supportive in principle of proposals for a workers' caravan site with 400 pitches, housing up to 600 workers on Land East of Eastlands Industrial Estate (LEEIE). The Council accepts the applicant's assumption that this accommodation will reduce pressure on the private rented and tourist accommodation sectors in East Suffolk, as well as reducing transport movements to the site. There may be a risk associated with poor take up of the campus accommodation, which would further add pressure on the local housing market as well as on traffic volumes; this should be addressed through contingency mechanisms that allow the housing fund and other accommodation related measures to be adjusted.
112. The applicant should ensure the caravan site at the LEEIE will be available **prior** to work commencing on the main development site and that the accommodation campus will be available, preferably on a phased basis as constructed, **before** peak levels of construction workers are on the site. If this was not achieved, the Council is also concerned that the transport impacts set out in the Early Years assessment of the Environmental Statement are likely to be exceeded.
113. With the proposed increase in workers to 7,900 + 600 and the applicant anticipating that the majority of these will be non-home based, there is a concern that the local housing market could be overwhelmed during peak construction time periods. This potentially results in a significant adverse impact on the housing availability in the surrounding area with potential overspill into adjacent districts. The applicant is asked to put an even stronger focus on using home-based workers to minimise impact on the local housing market. The Council also seeks for the applicant to create opportunities for flexibilities to increase (or reduce) the size of the campus as and when required. The Council is particularly concerned about housing impacts on the most vulnerable in our society, many being supported through Council services, as well as safeguarding issues associated with renting out rooms.
114. East Suffolk Council has recently commissioned consultants to assess and test the robustness and predictions of the applicant's gravity model, a model used to predict the likely areas that workers will want to live, which is impacted by availability of accommodation and numbers of workers. This assessment will indicate whether the Councils can be satisfied that it accurately represents future outcomes. The review of the Gravity Model may also have an impact on transport assessments and impacts. The findings of this will be reported in the Council's Local Impact Report.
115. **Housing Fund:** The Council supports the principle of a Housing Fund, providing it is robust, flexible and of a suitable scale to meet the needs of a potentially changing housing market. It is anticipated that most of the Fund would be required to be spent and invested in the first 7 years of the construction of the project to provide additional resilience in the local housing market. The Council will continue to support East Suffolk Council in its work

with the applicant on the principles for the Fund and agreeing governance of the Fund. The Council seeks for the Housing Fund to also have a focus on mitigating the accommodation impact on vulnerable adults, families and young people.

116. **Community safety and public services:** The Council assumes that, despite the welcome measures related to the Workers Code of Conduct, there is a likelihood of detrimental impacts on community safety and community cohesion, as a result of the significant number of non-home based, predominantly male and young, workers within a community characterised by small towns and general rurality. The Council disagrees that potential effects on community cohesion after proposed built-in mitigation measures are likely to be “minor adverse (not significant)”. The Council is concerned that community safety impacts will occur, particularly related to sex services (sexual health), sexual exploitation of young people and trafficking, drugs / county lines, alcohol misuse, anti-social behaviour, domestic violence, sexual violence, the corresponding additional risks to safeguarding of vulnerable people in our society, as well as wider community cohesion and integration issues. A package of funding for preventative measures, robust monitoring and contingency funding is required to mitigate these impacts. This needs to include funding to Suffolk Constabulary for additional policing as well as availability of appropriate levels of funding for multi-agency responses and preventative measures to these issues.
117. The Council disagrees with the applicant’s assessment that there are insignificant impacts on most areas of community and public services. Based on realistic worst-case assumptions, the Council assumes there is a risk of impacts on service areas including social care, safeguarding, family services, housing for vulnerable adults and families, and other areas. The proposed Public Services Contingency Fund should both aim to prevent impacts and deal with unexpected impacts, therefore may be better referred to as a Public Services Resilience Fund. The fund needs to be of a scale and remit to include preventative measures based on a realistic worst-case scenario.
118. **Fire & Rescue / Emergency Services:** The Council is further investigating impacts of the development on the Fire & Rescue Service. Specific service contributions to the Fire & Rescue service will be required, at an appropriate scale. The Council expects these contributions and measures to address an increase in demand on Fire Service resources, both from the growth in population entailed by the construction project, and from the requirement for the Fire Service to visit the project site and to devise strategies and conduct specific training to manage the unique risks presented by the project.
119. Measures also need to include mitigation for delayed response times, because of Sizewell C traffic (including AILs) and the construction of online highway mitigation as part of the Sizewell C proposals along the corridor. The Council recognises concerns that the current Transport Incident Management Plan (TIMP) does not yet adequately address the impacts of disruption on the highway network, in particular the lack of suitable alternate routes for HGVs. It can also be expected that, because of the increase in traffic, there will be more road traffic accidents, which will increase the service demand for emergency services. As part of the mitigation package, the Council expects that a robust

incident management protocol for the main access routes is developed by the applicant in co-operation with the emergency services, national and local highway authorities, with appropriate levels of funding by the applicant.

120. The Council notes that similar concerns exist for the other blue light services, i.e. the Police and Ambulance services. The Council has worked in close partnership with these organisations, and fully supports their representations on this matter.
121. **Health:** Most health mitigation is limited to occupational health service which, whilst the proposed provision may be of high quality, is in itself not sufficient for the workforce. The onsite health services also do not mitigate for health impacts on the wider community, with the Council particularly concerned about detrimental impacts on mental health, stress and anxiety and sexual health. Whilst elements relating to risky behaviour, including substance misuse, sexual exploitation and trafficking, and unplanned pregnancies, are identified in the DCO, the proposed mitigation is too limited and further measures need to be included, both preventative and reactive. An agreed schedule of monitoring and mitigation of impacts on public services and social services will be required throughout the construction phase of the development. An element of mitigation will need to include service contributions to the Council in its Public Health role, through Section 106 agreements. Equally, appropriate levels of funding should be provided to the local Clinical Commissioning Groups (CCGs) (Ipswich and East Suffolk CCG and Norfolk and Waveney CCG), the Acute Trusts and the Ambulance Service, to mitigate for additional costs to and demand for their services, ensuring that the health provision for residents is not unduly affected as a result of the Sizewell C construction.
122. **Impact on schools and early years provision:** Whilst the DCO recognises a potential impact on school capacity and early years provision because of workers' families, the mechanism for funding needs to be agreed. Any significant increase in demand because of young families associated with the development could adversely impact on the Council's duty to provide sufficient childcare. It is likely that Sizewell C's worker families will impact on the delivery of school education and early years provision as a result of e.g. potential need for English as Additional Language (EAL) provision and preventative and safeguarding work; detailed agreement is required to ensure that appropriate levels of funding and clear criteria are in place for schools, early years settings and the Council to access this funding.
123. **Residual community impacts:** Due to the scale and nature of the development, there will be a substantial residual impact on the community's wellbeing and quality of life. The principal of the proposed Community Fund is supported, however further discussions are required as to its scale, scope and governance arrangements.

#### **Other impacts and concerns**

124. **Flood and drainage:** The Council expects any proposal to have appropriate surface water drainage infrastructure which prioritises the use of Sustainable



Drainage Systems (SuDS) and does not increase existing surface water flood risk.

125. Currently, some of the proposals cause significant concern in this respect. The Council has not yet seen evidence that any of the surface water drainage infrastructure proposed to serve the Main Development Site, the Land East of Eastlands Industrial Estate and Associated Developments can be facilitated within the proposed red line boundaries to a satisfactory standard. As Lead Local Flood Authority, the Council requires these issues to be resolved, with evidence that a suitable drainage solution can be delivered for all sites both during construction and operation.
126. **Water Supply:** The applicant proposes several high-level options to access the large amounts of potable and non-potable water it requires, yet it is clear that the majority of these options require medium to large scale interventions. Some of these may have significant environmental impacts, particularly in construction but also in operation, which have not been assessed within the submitted environmental statement. Equally, if the water supply measures by the applicant prove insufficient, there is the potential for risk to private water supplies in the area which will need to be properly assessed. The Council reserves judgement on these until further detail is available. The Examining Authority will need to look closely at the options proposed and their wider environmental impact, including in combination with those impacts assessed in the Environmental Statement.
127. **Noise:** (Note: Transport related noise impacts are covered in the transport section above.) The applicant has identified a range of adverse and significant adverse noise that will affect a wide range of sensitive receptors both around the development and across the wider district. It is still to be determined by the Council whether the assessments have not underestimated the impacts on those receptors that have been identified by the applicant as having low or negligible impacts. The Council is still assessing the actions and mitigations required. A flexible and comprehensive scheme of ongoing assessment, monitoring and mitigation is likely to be key to minimising the noise impact of a development of this nature and the Council will be seeking assurances to this effect, particularly if there is an expectation of flexibility on our part.
128. **Air quality and dust:** (Note: Transport related air quality impacts are covered in the transport section above.)
129. The Council is concerned about non-traffic air quality impacts particularly related to dust and wind erosion from strong coastal winds arising from stockpiles and concrete batching. Due to the height of the proposed stockpiles, wind erosion is likely to be an issue. Further work is required by the applicant to verify its assumptions about stockpile erosion, to assess the impact on ecological receptors as well as impacts on the occupants of the

- Accommodation Campus and to review and enhance necessary mitigation and monitoring arrangements.
130. The proposed lime spreading may result in lime / dust translocation posing a risk activity for nearby ecological receptors; further site-specific mitigation based on measurement of local weather conditions is required.
  131. In addition, emissions from Non Road Mobile Machinery (NRMM) have not been assessed beyond the haul roads on the main development or for the Associated Development sites which needs to be undertaken. The Council would expect the best currently available NRMM emissions controls standards, and use of electrically powered plant where possible, which are currently not being proposed by the applicant. Similarly, further assessment of air quality impacts from plant and the highest available standard of abatement for diesel generators is required to ensure that no adverse impacts arise due to operation of the generators.
  132. Further assessment of ecological impacts should be carried out in the light of the proximity of ecological receptors such as the Sizewell Marshes and Minsmere Marshes SSSI to the main development site. Based on this, suitable mitigation and monitoring needs to be identified.
  133. **Lighting:** Concerns remain about the potentially significant impact of lighting particularly during construction, with regards to nuisance, ecology, tranquillity and dark skies; this needs to be addressed through lighting plans and assessments as well as monitoring.
  134. **Leiston Recycling Centre on Lovers Lane:** Increased traffic, particularly of HGVs, will significantly impact on the road safety for access to the Recycling Centre on Lovers Lane, predominantly in the early years of development. A suitable safe solution is required; if the applicant cannot identify a transport solution that avoids congestion on Lovers Lane, a relocation of the centre to an alternative site will be required. At this point, the applicant has not yet put forward acceptable proposals.
  135. **Emergency Planning Provisions:** The Council's and District Councils' Joint Emergency Planning Team needs to undertake an assessment of impact on emergency planning provisions for Sizewell B given the increase in local residents during construction of Sizewell C. At this point, the applicant has not yet provided the required information to undertake this work in the submission or otherwise.
  136. Regarding the wider impacts of the major accidents and disasters assessment, particularly on flood risk, the Suffolk Resilience Forum will be looking to provide a collective Suffolk view on the proposed developments. In particular this will include a view on the adequacy of flood risk emergency plans for the main site.
  137. **Archaeological provisions:** Some evaluation of archaeological potential has been completed, but for much of the project area work is ongoing or yet to start. In particular, the Two Village Bypass, Sizewell Link Road and Ecological Mitigation Areas have significant areas still requiring Geophysical Survey and Trenched Evaluation. This work could be required by the DCO, rather than frontloaded, but such an approach comes with significant risks to project timescales and finance. The applicant must be willing to accept responsibility

for these risks, and a suitably robust framework for handling this work must be in place.

138. To achieve this, the Overarching Written Scheme of Investigation (WSI)<sup>16</sup> requires significant amendment prior to being acceptable. Evaluation and mitigation will be required if unexpected complex archaeological remains are identified. Currently the provided WSI does not address these concerns, and needs to be amended in order to
- provide clarity on the archaeological works and reporting to the Council, through evaluation and mitigation phases;
  - provide post-excavation assessments;
  - identify Suffolk County Council Archaeological Service as the archive for archaeological remains recovered in Suffolk; and
  - make provisions for public outreach.
139. The draft requirements need to be amended to secure the appropriate phases of archaeological investigation, and mechanisms for ensuring timely post-excavation analysis and publication of results.
140. Additionally, a specific mechanism for Suffolk County Council Archaeological Service to reclaim costs incurred is necessary because input will be required beyond discharge of DCO requirements.
141. **Heritage:** The assessments undertaken regarding built heritage assets are of an acceptable standard. Further detail on heritage impacts will be included in the Council's Local Impact Report.
142. **Implementation contingency funding:** There should be mitigation reserves to deal with impacts (and length of time of impacts occurring) as a result of implementation slippage, with a review of annual contributions in the event of extended construction period.
143. **Site remediation bond:** A site remediation bond is required in case the development is being abandoned during construction.
144. **Decommissioning of the power station:** The Council expects adequate provision for decommissioning of the power station at the end of its lifetime. This needs to include provision for adequate resources set aside to ensure that decommissioning can take place without it being a burden on the public purse, and that the site will be restored to a state commensurate with the status of the land as an AONB.

### Monitoring and governance

145. The applicant has, since submitting the DCO application, shared with the Councils its headline proposals for monitoring and governance. These look generally acceptable but need to be further developed.
146. The Council expects a transparent, robust, adaptive and comprehensive monitoring framework for all topic areas – transport, socio-economic issues and

<sup>16</sup> Book 6.3, Chapter 16: Terrestrial Historic Environment, Appendix 16H: Overarching Written Scheme of Investigation

the environment - throughout the construction phase and, where applicable throughout the operational lifetime and decommissioning of the development. The Oxford-Brookes' Study on the impacts of the early stage construction of the Hinkley Point C Nuclear Power Station (2019)<sup>17</sup> concludes this as an important learning point from Hinkley Point C, where in particular biophysical monitoring data was not available. The Council considers that ecological monitoring is especially essential given the environmentally sensitive location of Sizewell C.

147. The applicant has recently shared with the two Councils its initial proposals for governance across all topic areas. The Council will continue discussions with the applicant about the governance structure. Within these discussions, it will also raise its proposals on the governance for and between the various residual mitigation funds.

### Cumulative impacts

148. The Council considers that the full cumulative impacts of the existing and potential future projects in the east Suffolk area have not been adequately assessed within the application. In addition, whilst a number of schemes have been included in some detail, further information on these and other schemes coming forward will become available during the course of the next few months and should be taken into account by the Examination. These include offshore wind projects, inter-connector cables across the North Sea and an inter-connector project to Kent.
149. **Transport:** Notwithstanding the comments above relating to the acceptability of the assessment having yet to be agreed, a cumulative impact assessment that includes the offshore wind farm proposals by ScottishPower Renewables of East Anglia 1 North (EA1N) and East Anglia 2 (EA2) has been undertaken by the applicant for both the 'Early Years' and 'Peak Years'. The assessment includes an additional 270 HGVs on the A12 (with 85% of those travelling to/from south). Use by the EA1N and EA2 developments of two transport corridors, the A12/B1122 and A12/A1094/B1069, will add to the transport impacts resulting from Sizewell C although the latter will only affect its light vehicle movements. Delivery of mitigation schemes will need careful consideration of delivery to avoid disrupting traffic from other projects already using that route.
150. In general, the cumulative assessment indicates a worsening of junction performance across the network; most notably an exacerbation of previously identified issues on the A12 between the A1152 and A14, and at the A12 / Woodbridge Road junction at Bredfield.
151. It is important to note that the proposed Sizewell development includes mitigation at the Friday Street junction and the B1122 junction; both these junctions form routes for EA1N and EA2 traffic and therefore the potential exists

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<sup>17</sup> Impact Assessment Unit (IAU), Oxford Brookes University: Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station: Monitoring and Auditing Study Final Report (2019) available at <https://doi.org/10.24384/xeb3-7x48>

for further delays and the interaction between the projects needs to be communicated and well managed.

152. With regards to the environmental transport impacts associated with both projects; the cumulative assessment indicates an exacerbation of previously identified issues as set out below:
- Prior to delivery of the Sizewell Link Road, significant adverse impacts on the B1122 including through Theberton and Middleton Moor;
  - According to the applicant, the developments are close to triggering a Moderate Adverse Impact on Fear and Intimidation through the villages of Little Glemham and Marlesford and, prior to delivery of the Two Village bypass, Farnham and Stratford St Andrew. According to the applicant's assessment this would be triggered at 2,000 HGVs and impacts of approximately 1,950 have been assessed. It can be considered that this impact needs to be considered also without the in-combination effect, as it is not realistic to suggest that a 50 HGV difference across 18 hours would suddenly trigger an arbitrary threshold; especially on communities such as these where footways are often narrow and properties face directly onto the highway.
  - A moderate adverse impact is based on the applicant's assessment triggered in the peak years scenario as a result of impacts associated with Fear and Intimidation, but there are no proposals to provide a contribution towards mitigating these impacts; the vast majority are associated with the proposed development. The applicant indicates that a Moderate Adverse Impact may not arise due to a number of factors, one of these is the commensurate delivery of EA1N an EA2; however if the projects were to be delivered contiguously, the potential exists that this impact could be felt for a longer period of time.
  - The concerns regarding the impacts to driver delay on the network are only likely to be further exacerbated by the additional development; and importantly this will detrimentally affect emergency service vehicle response times.
  - The cumulative impact of both schemes is likely to further exacerbate issues relating to road safety.
153. Relevant controls need to be put in place to ensure that the impacts of the development do not exceed those assessed; this is pertinent in the case of cumulative impacts where combined impacts are not proposed to be mitigated by the applicant due to the length of time they are occurring for and their deemed likelihood of the impacts occurring. Therefore, it is reasonable to consider that additional funding and appropriate monitoring, as set out above, needs to be put in place to ensure those cumulative impacts can be identified and then mitigated should they occur.
154. **Environment:** While the Environmental Statement takes into account the cumulative landscape impacts in terms of the Landscape and Visual Impact Assessment of specific schemes, there is a wider impact that is not covered by this process. There will be a perception for residents and visitors of

encountering a sequence of construction and associated activity as major projects take place on several sites in the wider area.

155. In respect of the cumulative ecological impact, it is not clear why the construction of the EA1N and EA2 has been scoped out of the assessment of cumulative impacts, particularly in respect of Natura 2000 sites, when the cable corridor passes relatively close to the Sizewell C project.
156. ***Economic development and skills:*** The Council expects there to be full consideration of the potential in-combination effects on labour market of Sizewell C with other major construction projects other than just ScottishPower Renewable's projects EA1N, EA2 and EA3. The recent Technical Skills Legacy Study carried out by Pye Tait<sup>18</sup> identifies a number of significant projects that will be delivered in the same time period as the proposed construction of Sizewell C. These include but are not limited to:
- Bradwell B
  - Lake Lothing Third Crossing known as the Gull Wing;
  - Great Yarmouth Third River Crossing;
  - Vattenfall Vanguard and Boreas Windfarms;
  - Proposed windfarm extensions
  - Interconnectors (Nautilus etc);
  - Other power stations in England and Wales;
  - Sizeable engineering projects such as Crossrail 2, Lower Thames Crossing etc.
157. Alongside this, the timelines for construction of EA3 have changed and are significantly different to the timelines presented in the DCO. These changes are well known and publicised so therefore need to be reflected in the cumulative impact assessment.
158. The methodology that has been used by the applicant to assess any impact asserts that the total workforce needed to build the in scope projects would not exceed the peak employment figure being used for Sizewell C and therefore cumulative impact would be no more significant than that being mitigated against at peak employment of the Sizewell C project.
159. The Council disagrees with this conclusion, as this very basic methodology does not take into account the different skill sets needed to deliver at particular phases of the project and only concentrates on construction labour.
160. The Council expects the applicant to look at this in more detail, breaking the project into its phases (Enabling, Main Civils, MEH [Mechanical, Electrical and Heating, ventilation and air conditioning], Commissioning and Operation) and

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<sup>18</sup> Pye Tait: The Technical Skills Legacy for Norfolk and Suffolk, March 2020, page 53 ff  
<https://www.suffolkgrowth.co.uk/technical-skills-legacy>

then assessing these against the same and similar phases of a more comprehensive in scope projects list.

161. **Housing:** During the construction phase of Sizewell C there will be pressure on existing housing stock in east Suffolk proposed to be mitigated by a Housing Fund. Non- Sizewell C projects may have similar or alternative means to address impacts on housing stock. However, the Council considers that the cumulative pressure on the local housing stock may increase impacts in East Suffolk and may push workers to look further afield creating pressures on adjacent authorities such as Ipswich and Mid Suffolk. Appropriate monitoring and mitigation measures need to be put in place for all affected areas, to ensure housing impacts are managed and mitigated.

### **Discharging responsibilities / Protective Provision**

162. The County Council expects that it must take the lead in discharging requirements related to its relevant statutory functions, specifically Highways (including Public Rights of Way), drainage and surface water and archaeology<sup>19</sup>, in consultation with East Suffolk Council (and other agencies as required). This is to allow for the lead professionals to discharge their areas of expertise, and to make the discharge of requirements as effective as possible. For any other requirement outside of these functions, the Council supports that East Suffolk Council discharges them in consultation with the County Council.
163. The DCO submission is contradictory on the matter of which local authority it proposes to discharge highways responsibilities. The Council strongly represents its view that the County Council as the Local Highway Authority must discharge all transport-related requirements of the DCO, including the two-village bypass and Sizewell Link Road, junction improvements and modifications, any traffic related requirements such as caps or transport management plans, and requirements related to Public Rights of Way and cycling provision.
164. The Council considers that, in addition, some form of Protective Provision for the Local Highway Authority may be required in order for it to continue to discharge its duties under the Highways Act (1980) within those parts of the public highway included within the applicant red line , and hence under the control of the applicant during the construction phase.
165. As the Lead Local Flood Authority the County Council considers that it should discharge requirements related to drainage and surface water discharge. This is particularly important as many of the drainage proposals at this point are not fully developed and cause reason for concern (see above). The Council

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<sup>19</sup> This principle would equally apply to other statutory functions that the Council is responsible for – such as education, public health and social care – but the Council currently does not anticipate that requirements in these topic areas will feature in the Sizewell C DCO, with measures in these topic areas likely to be secured through Section 106 agreements.

proposes that Protective Provisions should also be considered for these topic areas.

166. In its statutory archaeological role, the County Council also expects to discharge archaeological requirements.

**Other contents of the Development Consent Order (DCO)**

167. The Council will pick up any further issues and comments on the Draft DCO directly with the applicant, in advance of the Examination Meeting focussed on the DCO. Further details on any remaining issues will be included in the Council's Written Representations.



**GLOSSARY**

AIL	Abnormal Indivisible Load
AONB	Suffolk Coast and Heath Area of Outstanding National Beauty
AQMA	Air Quality Management Area
CCGs	Clinical Commissioning Groups
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Site
CWTP	Construction Worker Travel Plan
DCO	Development Consent Order
EA1N	East Anglia 1 North (offshore wind farm development promoted by ScottishPower Renewables)
EA2	East Anglia 2 (offshore wind farm development promoted by ScottishPower Renewables)
EA3	East Anglia 3 (offshore wind farm development promoted by ScottishPower Renewables)
GDA	Generic Design Assessment
GIL	Gas Insulated Lines
HGV	Heavy goods Vehicle
HRA	Habitats Regulation Assessment
IROPI	Imperative Reasons of Overriding Public Importance
LEEIE	Land east of Eastlands Industrial Estate
MMP	(Coastal) Monitoring and Mitigation Plan
NPS	National Planning Statement
NRMM	Non Road Mobile Machinery
RAMS	Recreational Avoidance Strategy
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TIMP	Transport Incident Management Plan