



CABINET

Tuesday 31 January 2017

RESPONSE TO EDF ENERGY'S SIZEWELL C STAGE 2 PUBLIC CONSULTATION (CAB04/17)

EXECUTIVE SUMMARY

1. EDF Energy is proposing to build a new nuclear power station at Sizewell. This would be a very significant development for Suffolk, with a wide range of potential positive and negative impacts.
2. EDF Energy's pre-application consultation on developing plans for a new nuclear power station at Sizewell is organised in three stages. The Stage 1 consultation took place in 2012/13, to which Suffolk County Council and Suffolk Coastal District Council (referred to in this report as "the Councils") submitted a joint response. EDF Energy has now launched its Stage 2 consultation, with some further details of the proposal. A final Stage 3 consultation, possibly expected in 2018, will be undertaken ahead of the formal submission of an application for development consent that will be determined by the Secretary of State for Business, Energy and Industrial Strategy.
3. This report sets out the draft response to EDF Energy's Stage 2 consultation on this development in the appendix, as well as recommendations as to how the Councils should work with other partners to maximise opportunities and minimise impacts of the development.
4. Suffolk Coastal District Council and Suffolk County Council have the status of statutory consultees in relation to the proposed development of a new nuclear power station at Sizewell. This is a highly significant development for Suffolk, due to its scale and potential impacts, both positive and negative, upon the area resulting from both construction and operation of the new power station. Not only will the immediate area surrounding the construction site be affected but also the areas where Associated Development sites are proposed. Each of these off-site developments are substantial developments in their own right and include two Park and Ride sites and an accommodation campus. Furthermore, there will be economic impacts across a wider area of Suffolk, the region and beyond.
5. The two Councils' lead officers have produced a draft Joint Response to EDF Energy's Stage 2 public consultation on their emerging proposals and this is included as an Appendix. Members are asked to consider and if they are content endorse the responses set out in the Appendix. Evidence to support these recommendations is set out in the main body of the report with further technical detail contained in the Appendix.

6. It is recommended that, in line with previously determined policy, the Councils continue to support the principle of a new nuclear power station at Sizewell C, recognising the significant benefit that such a development would bring to Suffolk. However, based on the information put forward in the Stage 2 Consultation, the Councils are not yet able to fully support the specific proposals by EDF Energy, as the impacts of the proposed development are not yet fully developed or evidenced. As such it is not possible to confirm a definitive position on many aspects of the emerging scheme nor comment fully as to whether the impacts have been appropriately mitigated or compensated. Therefore, the Councils are not yet fully convinced that the benefits of EDF Energy's proposals are considered greater than the impacts. We will welcome the opportunity to further engage with EDF Energy to help it develop its proposals, including seeking to mutually resolve the necessary mitigation and compensation measures.
7. The reports being discussed by separate Cabinet meetings of the two Councils have a consistent content, the same recommendations and the same proposed joint response to EDF Energy in their appendices. It is considered that such a joint response lends greater weight to the views of the two Councils.
8. **Members have been provided with copies of EDF Energy's consultation documents and are advised to bring them to the cabinet meeting. They are also available on EDF Energy's website at <http://sizewell.edfenergyconsultation.info/szc-proposals/stage-2/>**

Is the report Open or Exempt?	Open
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Wards Affected:	Whole district
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Cabinet Member:	Councillor Geoff Holdcroft, Cabinet Member with responsibility for Economic Development
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Supporting Officer:	Philip Ridley Head of Planning and Coastal Management – Suffolk Coastal and Waveney District Councils 01394 444432 Philip.ridley@eastsuffolk.gov.uk
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1 INTRODUCTION

- 1.1 EDF Energy is proposing to build a new nuclear power station at Sizewell. This would be a very significant development for Suffolk. The investment into Sizewell C would be similar to the Crossrail project, with £14bn+ investment, and would be equal in size to the Olympic Park in East London. The construction site would take up 300ha of land, largely within the Area of Outstanding Natural Beauty (AONB) which also contains many ecological designations. It would create 5,600 peak construction jobs, 900 operational jobs (60-70% of which are non-nuclear specific) and 500 temporary jobs supporting Associated Development sites. The development is expected to generate a £100m pa investment boost to the regional economy during construction and £40m pa during operation.
- 1.2 This proposal will be considered under the Nationally Significant Infrastructure Project (NSIP) process, under the Planning Act 2008, and it must be noted that the process of consultation is undertaken and “owned” by the development promoter and not by the local authorities. The planning application will be examined by the Planning Inspectorate who will make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy (BEIS). It will be the Secretary of State who makes the decision on whether the proposal will be approved.
- 1.3 However, Suffolk Coastal District Council and Suffolk County Council (referred to below as “the Councils”) have a key role to play in putting forward the views of the local community at this stage. As consultees the Councils are committed to doing all they can to make sure the development can work for the people of Suffolk as well as the nation’s energy needs. Subsequently, there will also be explicit roles for the Councils in providing a Local Impact Report for the Examination of the application by the Planning Inspectorate. In these contexts, the roles of the two Councils are equal. The Councils will also, as local planning authorities, be responsible for discharging the Requirements (planning conditions) on the Development Consent Order (DCO) and be responsible for the monitoring and enforcement of any DCO made.
- 1.4 EDF Energy is consulting on its Stage 2 proposals to build a new nuclear power station at Sizewell, together with the required Associated Development at various locations in East Suffolk. This is the second stage of what is now a three-stage process of consultation, with indications that the third and final stage consultation could take place in 2018. After the third consultation stage, it will be for EDF Energy to decide whether to submit its application for a Development Consent Order to the Secretary of State for consideration via the National Infrastructure Planning section of the Planning Inspectorate (<https://infrastructure.planninginspectorate.gov.uk/>).
- 1.5 The Stage 2 Consultation started on 23 November 2016, with a closing date of 3 February 2017. It should be noted that the two councils raised concerns regarding the short length of the consultation period and will be making strong representations to EDF Energy that the Stage 3 consultation must be longer.
- 1.6 The Stage 2 consultation follows EDF Energy’s Stage 1 consultation in 2012-13, to which the two Councils jointly responded in early February 2013. The Stage 2 consultation includes further details on many of the proposals which are of great importance to Suffolk and the local residents most affected by the development. The main changes compared to Stage 1 are:
 - a) On the main development site, the proposal now includes onsite borrow pits and stockpiles of up to 35 m height;

- b)** Confirmation of EDF Energy's proposed Campus site location at Eastbridge Road; with three design options;
- c)** The proposal of a temporary caravan accommodation east of Eastlands Industrial Estate;
- d)** Consultation document lists four options for mitigating impact at Farnham (do nothing, road widening, one-village-bypass, two-village-bypass);
- e)** Improvement options for B1122 – two options for junction with A12, and proposals for small scale improvements along B1122;
- f)** Preferred sites for Park and Ride sites: Wickham Market in the South and Darsham in the North;
- g)** Freight Management Facility is no longer proposed;
- h)** Two rail options, two jetty options and one beach landing facility option

- 1.7 Post the Stage 1 public consultation EDF Energy submitted a request for a Scoping Opinion as required by the Environmental Impact Assessment (EIA) Regulations to the Planning Inspectorate. The Councils were consulted on this submission. A joint response from the Councils was sent to the Planning Inspectorate dated 22 May 2014 giving our comments and opinion on the submission. This was taken into consideration by the Planning Inspectorate in the formal [Scoping Opinion published in June 2014](#).
- 1.8 This Scoping Opinion sets out the required contents of the Environmental Statement necessary to accompany the Development Consent Order (DCO) submission and which will need to address all matters set out therein, including evidence for the respective choices that EDF Energy has undertaken together with cumulative effects. It is understood that the Stage 3 consultation may include a draft Environmental Statement.
- 1.9 If consent is given, it is anticipated it will take 10 to 12 years to build and complete the station. Following construction, Sizewell C will be operational for a minimum of 60 years. However, spent fuel is likely to be stored on site beyond the operational life of the station whilst a permanent spent fuel repository to store all the nation's nuclear waste is established elsewhere in the country by Government.
- 1.10 EDF Energy is seeking the views of the Councils alongside those of other bodies and the public. As with the Stage 1 response, Suffolk Coastal District Council and Suffolk County Council aim to again issue a joint response to EDF Energy in relation to their Stage 2 consultation.
- 1.11 The appendix contains the draft joint response from the Councils to EDF Energy's Stage 2 proposals for the new power station and Associated Development sites.
- 1.12 The draft response has been developed with, and informed by, close joint working between the two councils. The lead members on Sizewell C are meeting regularly with local members representing the most affected wards to ensure that local views are taken into account. In addition, the District Council's Sizewell C Task Group has the role to scrutinise the consultation proposals and make recommendations and comments to be considered by the District Council's Cabinet. This Task Group enables local members to input directly into the process and provide local knowledge on how the proposals affect their local areas. Attached to this report as Appendix C are the Unconfirmed Minutes of the Sizewell C Task Group meeting held on the 11th January where it considered the consultation documents.

- 1.13 The consultation documentation for Stage 2 remains insufficiently comprehensive or not sufficiently evidenced in a number of important areas for the Councils to be able to consider fully the impacts. Therefore, we are not able to evaluate fully how adequate the proposed mitigation proposals are. As a result of this, and the need to ensure that the Council can set out fully all the elements of this significant project that need to be considered as the proposals evolve, the report is not limited to responding to the consultation questionnaire presented by EDF Energy; it is written to address all those issues that matter to East Suffolk and in many respects Suffolk as a whole. This is to ensure that as statutory consultees in this process the Councils can provide the local leadership required to deliver the best outcomes for the area, accepting that the Councils support the principle of new nuclear build.
- 1.14 Therefore, the Councils are not yet fully convinced that the benefits of EDF Energy's proposals are considered greater than the impacts. It is a source of some dissatisfaction that because of the above the Councils cannot come to an evidence based view on so many matters. We will therefore welcome an opportunity to engage further with EDF Energy to help them develop their proposals, including seeking to mutually resolve the necessary mitigation and compensation. It is in both parties' interest that the Sizewell C proposal becomes a proposal which can work in and for Suffolk.
- 1.15 This report sets out the rationale behind the draft responses.

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NATIONAL POLICIES

- 2.1 The Planning Act 2008 requires that major infrastructure proposals must be considered in accordance with a relevant National Policy Statement (NPS). These relate to different topics and have been ratified by Parliament. In the context of this proposal, the relevant NPSs are the overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Nuclear Power Generation (EN-6). It states that the Infrastructure Planning Commission (now the National Infrastructure Unit of the Planning Inspectorate) "must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent it is satisfied that to do so would result in adverse impacts from the development outweighing the benefits. The fact that a site is identified as potentially suitable within this NPS does not prevent the impacts being considered greater than the benefits."
- 2.2 Although the National Policy Statements provide the main policy context for the Planning Inspectorate, it should also refer to other matters which it thinks are both important and relevant to its recommendations to the Secretary of State. This could include the Development Plan of the local planning authority. However, in the event of a conflict between the National Policy Statement and any other matter, the National Policy Statement prevails.
- 2.3 Relevant elements of the National Policy Statements relating to the need for the proposal include:
- a) The Infrastructure Planning Commission (now the National Infrastructure Unit of the Planning Inspectorate) should assess all applications for development consent for the types of infrastructure covered by the Energy National Policy Statement on the basis that Government has demonstrated that there is a need for those types of

infrastructure and that the scale and urgency of that need is as described for each of them [see d) below].

- b) The Planning Inspectorate should give substantial weight to the contribution which projects would make towards satisfying this need and to the benefits (including the displacement of Carbon Dioxide emissions) when considering applications for development consent.
- c) It is Government policy that new nuclear power should be able to contribute as much as possible to the UK's need for new capacity.
- d) Given the urgent need for low carbon forms of electricity to contribute to the UK's energy mix and enhance the UK's energy security and diversity of supply, it is important that new nuclear power stations are constructed and start generating as soon as possible and significantly earlier than 2025.
- e) The National Policy Statements also set out a series of criteria against which the Planning Inspectorate should test applications. In large part these replicate the types of test that would be used for any development proposal, but their specific applicability to the energy sector is identified.

2.4 As part of the production of the National Policy Statements, the Department of Energy and Climate Change (now Department for Business and Industrial Strategy) undertook a Strategic Siting Assessment for new nuclear power stations. Operators were invited to submit proposals for locations for such power stations and the suitability of these locations was then assessed.

2.5 Sizewell was one of eight sites across England and Wales that was considered to be potentially suitable. However, the fact that a site is identified as potentially suitable within the National Policy Statement does not prevent the impacts being considered greater than the benefits, with the consequence that the application could be rejected. It is this important assessment that members need to be mindful of when they consider the overarching merits and dis-benefits of the proposed development.

LOCAL POLICIES

2.6 As mentioned above, the National Policy Statements state that it is appropriate for other matters to be considered by the Planning Inspectorate, including the Development Plan. In this context, it would be most appropriate to look at the provisions of the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, as well as Suffolk County Council's Minerals Local Plan Core Strategy.

2.7 The principal relevant policy in the Suffolk Coastal District Local Plan Core Strategy is SP13 on nuclear energy. This policy sets out a series of local criteria which should be addressed, in addition, it identifies the opportunities that should be maximised, including:

- a) achieving renown with associated economic benefits e.g. a reputation as a 'centre of nuclear excellence';
- b) the long term implications for housing; and
- c) financial contributions to local communities.

2.8 Policy SP24 on Leiston recognises the potential impact of Sizewell on the town and seeks to achieve social and community benefits from future investment.

- 2.9 The County Council's Minerals Local Plan Core Strategy also includes policies which are relevant to the use of borrow pits.
- 2.10 The District Council's recently published East Suffolk Business Plan 2015-2023 is supportive of growth within the districts of Suffolk Coastal and Waveney District Council (WDC) and specifically refers to the huge opportunity for growing East Suffolk's economy through the Sizewell C new nuclear development opportunity.

STRATEGIC OBJECTIVES

- 2.11 The Lead Members and local Members of the two Councils agreed the following key strategic objectives to be achieved in partnership with EDF Energy, Government and other organisations, in relation to their requirements to safeguard the interest of east Suffolk residents during the development and operation of Sizewell C if the development were to take place:
- a) To provide a lasting legacy for the local communities and the economy;
 - b) To appropriately mitigate and/or compensate for local impacts;
 - c) To secure skills and education benefits for the wider area;
 - d) To support economic growth of the region and East Suffolk in particular;
 - e) To act as an environmental exemplar within the protected landscape, Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB);
 - f) To secure an infrastructure legacy;
 - g) To provide for funding of long-term community benefit; and
 - h) To have an appropriate decommissioning and removal of nuclear waste strategy.
- 2.12 Many of these objectives will not be delivered by working with EDF Energy alone, there will need to be a partnership approach and those partners will vary depending on the issue at hand. For example, working with Natural England, the Environment Agency and other partners will be key to delivering objective (e), while working with Government and the New Nuclear Local Authorities Group will be important in respect of objective (g). Objective (d) requires close working with the Chamber of Commerce, while for example a Four Village Bypass (under objective (f)) will require funding and support from Government.
- 2.13 It should also be acknowledged that in terms of jobs and skills issues in particular, there is the likelihood of other significant new nuclear build, and major national infrastructure projects under construction in the country. This may include new nuclear build at Bradwell, Essex. This adds to the "complexity" of the issues to deliver the maximum opportunity for the wider area.

STRATEGIC RATIONALE FOR PROPOSED RESPONSE IN THE APPENDIX

Overview

The following section sets out the rationale for responses set out in the Appendix.

- 2.14 As proposed in the recommendation of this report (see summary paragraph 1.13, it is recommended that the Councils continue to support the principle of a new nuclear power station at Sizewell C, however, based on the information put forward in the Stage 2 Consultation, the Councils are not yet able to support the specific proposals by EDF

Energy, as the impacts of the proposed development are not yet fully developed or evidenced.

- 2.15 To be able to support the development in full, the Councils expect to see significantly more detail and information in the next stages of consultation in order to be able to consider and review and advise on the appropriate mitigation or compensation for the significant negative impacts of the development. The Stage 2 consultation documentation does not provide sufficiently detailed information or sufficiently robust and evidenced mitigation proposals as well as still considering a number of different options for aspects of the scheme. This includes a lack of detail around the modal split, which has significant consequential impacts on many of the proposals. Substantial further work will be required before a Stage 3 consultation to satisfy the Councils' requirements. We will seek the opportunity to engage further with EDF Energy to help them develop their proposals, including seeking to mutually resolve the necessary mitigation and compensation, and welcome the opportunity indicated by EDF Energy in their documents that there may be additional consultation ahead of Stage 3 on specific elements to help them develop their scheme.
- 2.16 The Councils expect that the development must create a lasting economic legacy, supporting and developing local talent, act as an environmental exemplar and make appropriate provision for transport and the funding of wider community benefits. The general principles below amplify in detail how the development can be a success for Suffolk. Overall the Councils' approach to Sizewell C is to maximise the positive impacts that development can bring whilst minimising those negative impacts.
- 2.17 Even though the individual mitigation proposals have their cost, this has to be seen in the context of the level of investment. While Sizewell C's level of investment has not been announced yet, Hinkley Point C's investment level of £18bn gives a clear indication of the scale of the expected investment. For Hinkley Point C, EDF Energy agreed to compensation and mitigation through Section 106 agreements to the value of £92m. Sizewell C is, in comparison with Hinkley Point, a much more complex site with more demanding mitigation requirements for its impacts on the AONB.
- 2.18 Beyond mitigation and compensation, we will seek from EDF Energy a good level of benefit to the local community, to compensate for the many intangible impacts a project of this scale causes, in a similar way to that which exists in Somerset. This would also demonstrate that EDF Energy is a good local business that takes its corporate social responsibility to its locality seriously.
- 2.19 The District Council has a Community Infrastructure Levy in place; this would not apply to the Sizewell C development proposals. Any mitigation needed to facilitate the development would have to be provided by the developer as part of the Development Consent Order. In addition, a Section 106 legal agreement will be signed by interested parties and taken into account on the basis it meets the following tests: be necessary to make the development acceptable in planning terms, must directly relate to the development and should be fairly and reasonably related in scale and kind to the development. Discussions around S106 obligations are yet to commence.
- 2.20 Councillors will be aware that there have been proposals by National Grid for the twinning of the pylon line from Bramford (west of Ipswich) to Twinstead (south of Sudbury). This would be to allow for the future growth in generating capacity in this region, including Sizewell C but also the major windfarms off our coast. National Grid would submit its own Development Consent Order for such a proposal, and in the past, the local authorities (in this case Suffolk and Essex County Councils, Babergh and

Braintree District Councils) have proposed that this additional line should be underground. There has been no activity on this proposal for some time, but it may well come back once the timetable for the delivery of Sizewell C is clearer. As for the line from Sizewell to Bramford, this is already twinned and it is not anticipated that there is any need for additional pylons.

Economic impacts, skills, community impact

- 2.21 We welcome EDF Energy's aims, objectives and aspirations around socio-economics, aspiring to limit any significant adverse economic and social impacts, while creating significant business, training and job opportunities for local and regional communities during construction and operational stage.
- 2.22 In all socio-economic areas, the Stage 2 consultation indicates generally appropriate aspirations, but there is not enough detail on delivery mechanisms to determine whether the aspirations are achievable. We are committed to continue working with EDF Energy over the coming months, in advance of the Stage 3 consultation, to provide further input to their evolving proposals.
- 2.23 To meet EDF Energy's aspirations for opportunities for local businesses, skills development and employment, the draft Response to EDF Energy includes detailed feedback on a number of issues. This includes urging EDF Energy to be even more ambitious in increasing the percentage of locally based workers, particularly for the highly skilled jobs. We also request further work on the expected adverse economic impacts on other sectors, such as tourism.
- 2.24 We recognise that, in order to maximise the advantage of the development to the Suffolk and regional economy, the Councils will need to continue to work closely with Therese Coffey MP's Suffolk Energy Coast Delivery Board, Government, the Local Economic Partnership (New Anglia LEP), China General Nuclear Power Group, the Suffolk Chamber of Commerce and other partners in conjunction with EDF Energy to ensure that the right framework is created in order to lever the maximum economic benefit for Suffolk.
- 2.25 The Councils are also working at officer level with Essex County and Maldon District Councils in relation to EDF Energy's proposed Bradwell B Nuclear Power Station, to realise the cumulative benefits to the region of the two new nuclear builds. The travel to work zone of one will abut the other, thus it may be feasible to look at the two workforces in conjunction. There are potentially significant opportunities around skills and economic development in linking with Bradwell B, with the opportunity for potential local offices of EDF Energy and some of the tier 1 suppliers to serve both nuclear power stations.
- 2.26 The Councils highlight in their draft response to EDF Energy the need to mitigate and compensate for the community impacts of the development. Further detail is required to determine and mitigate the impact of the proposal on public services, to ensure that Councils and partners can effectively deliver its services to this increased population alongside Suffolk's current residents. This includes impacts on community facilities (such as schools, GP surgeries, dentists, hospitals), blue light / emergency services, social care and local community and amenity facilities. As part of EDF Energy's accommodation strategy we expect robust measures to mitigate any impacts on the wider housing market and local services and facilities associated with the demands of EDF Energy workers. We will look to explore opportunities for the Council to work with EDF Energy around these impacts.

- 2.27 We also ask EDF Energy to set up a Community Impact Fund to benefit those communities that suffer adverse impacts from the development.
- 2.28 The Sizewell C development will have a significant impact on the Leiston Household Waste Recycling Centre (Lovers Lane IP16 4UJ) by increasing congestion, leading to the risk of queuing. The County Council will seek early discussions about how the impact can be mitigated so that Leiston and the surrounding area can continue to receive a good recycling service. The Household Waste Recycling Centre is an important community facility and the Leiston Town Council has expressed concern about what impact the Sizewell C development may have on the site and its services.
- 2.29 The Government has committed to deliver a community benefit package to communities who will host new nuclear power stations, recognising the scale and duration of the impact of new nuclear power stations and the role that communities will play in hosting nationally significant infrastructure. The Councils will continue to work with local MPs and the New Nuclear Local Authority Group to ensure that a community benefit package is delivered alongside a full package of mitigation secured through the planning process. Detailed discussion with the Government is required in relation to the arrangements for delivering community benefit alongside proposals for the retention of business rates arising from Sizewell C in Suffolk. Government confirmed in 2013, when announcing that a community benefit scheme would be delivered for host communities, that there would be an annual sum paid over a 40 year period, based on electricity generated by a plant, to be provided to the local communities. This would be managed locally and used to bring a long-term economic and social legacy. The Government has been silent on this for some while. Recently the DCLG has informed the New Nuclear Local Authorities Group (NNLAG), with Cllr Holdcroft as the current Chairman, that there is to be a consultation, linked to the issue of Business Rates retention that will consider this issue. To date nothing has been forthcoming and officers are continuing to press. It should be noted that there is precedent for this type of fund from the off-shore wind developments and in the emerging fracking areas, albeit these possibly being different mechanisms than would be required in this case. This is a matter that needs to be taken forward by the Councils.

Environmental impact

- 2.30 The nominated site lies on the Suffolk Heritage Coast, wholly within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) National Designations, and the laydown area during construction phase will cross the entire width of the AONB. As a result, mitigation and compensation is very challenging, and EDF Energy needs to pay great attention to the detail. Given this high environmental sensitivity, Sizewell C should be an environmental exemplar in the way that it is executed. The mitigation hierarchy must be followed and residual environmental impacts compensated for through a Section 106 agreement. The fund established to compensate for the impact of the Dry Fuel Store is a welcome model which the Councils would like to explore further with EDF Energy.
- 2.31 The scale of the construction operation must not be underestimated; public enjoyment of this fantastic environmental resource will be hugely reduced for a significant period of time and potentially irreparably damaged – once visitor patterns are disrupted and brand credentials are damaged they can take some time to re-establish, which could have a significant effect on the tourism sector. EDF Energy will be reminded that much of the development they propose is in an AONB and thus should be delivered as an environmental exemplar. This means significant mitigation will be required to minimise

the impacts of the development and where the impacts can't be mitigated compensatory arrangements will be needed. Furthermore, the legacy of this development should be to create an environmental and amenity resource of national renown.

- 2.32 The Stage 2 consultation is disappointing in that it fails to recognise or truly acknowledge the environmental challenge that development at this site faces, nor the likelihood of residual impacts in a number of areas. Some ecological issues are hardly covered at all. There needs to be further significant work to seek to survey, understand, quantify and qualify these impacts.
- 2.33 We remain deeply concerned about the design of the main reactor site, given that Sizewell C will be sited in a landscape of national and international importance and sensitivity. The circumstances are unique in relation to new nuclear build, thus Hinkley Point C is of limited relevance in this respect. As not much further information has been provided, we will still require more detail and guarantees on the quality of exterior finish on the nuclear buildings (which are a fixed part of the generic approved design), and a more innovative approach from EDF to the design of the non-nuclear buildings. The design of Sizewell C should be an environmental exemplar, and we expect improvement in the design and, where it is not possible to improve the design quality, a compensation package due to the lasting impact on and damage to the AONB.
- 2.34 In the draft response in the Appendix, we note that the proposed compensation for the loss of Site of Specific Scientific Interest (SSSI) land at Aldhurst Farm is welcome but not sufficient, additional compensation will be required. EDF Energy provide four options for a road crossing of the SSSI, where the Councils probably prefer the three span bridge option, subject to further detail.
- 2.35 EDF Energy propose to build a new permanent access road to link Sizewell C to the B1122. This road would need to cross the Sizewell Marshes SSSI. EDF Energy provide four options to cross the SSSI, two of which are causeways, the other two bridges. Based on the information available at this point, and notwithstanding further evidence changing this view, the Councils consider that their preferred crossing option would be Option 3 (three-span bridges), as the option with likely least ecological impact on the SSSI. Option 1, a causeway over culvert, may need to be revisited should further information relating to flood defence be forthcoming that demonstrates a causeway would be required.
- 2.36 The Stage 2 consultation introduced the concept of borrow pits as part of their spoil management strategy. EDF Energy proposes to quarry construction material for use in building the power station from one or more borrow pits on site. These would be backfilled with peat and clay that will be excavated from the foundation area of the power station. The excavated and backfill material would need to be stockpiled, with the maximum stockpile height reaching 20m-35m.
- 2.37 The Councils have significant concerns about the proposal of borrow pits in a location within or adjacent to the AONB, with possible severe impacts on the AONB by changes to groundwater levels, and noise and vibration disturbance on the local wildlife. Equally, we are concerned about the visual and environmental health impacts of stockpiling at the proposed scale.
- 2.38 Due to a lack of further information on the proposals and an absence of assessments of alternative options, it is recommended that the Councils do not support borrow pits and the proposed level of stockpiling due to its impact on the sensitive environment of the AONB, unless there is evidence that a) alternative options, including the option of moving soil to the RSPB site at Wallasea Island which EDF Energy refer to as a fall back option,

have been fully considered and b) it is proven that the preferred approach does not have an unacceptable impact on the AONB and any impacts can be appropriately mitigated or compensated for. We would ask EDF Energy to clarify whether the option of shipping excavated material to Wallasea Island remains possible in the light of the judgement that was made in the Court of Appeal on 17 November 2015 (*R (Tarmac Aggregates Ltd) v Secretary of State for Environment, Food and Rural Affairs*).

- 2.39 We remain concerned about the impact of the proposed development on coastal processes and the marine environment, including the impacts of the proposed marine facilities (see para 2.69). In particular, we are concerned that the proposed footprint of Sizewell C is much further seaward than Sizewell B, which may have a significant impact on coastal processes and coastlines. No alternatives to this footprint have been provided. We recognise that pushing the footprint further inland would lead to further loss of the SSSI which would be significant and may be unacceptable; however, we have not been presented with a full assessment of this alternative to consider. However, given the potentially severe impact on our coastlines and/or on the SSSI, the Councils may find that neither of these options is acceptable. We urge EDF Energy to consider further whether the layout of the site could be further condensed to reduce the land take, and thus avoiding the footprint of Sizewell C to be neither further seaward nor taking up further SSSI land.
- 2.40 The Councils expect to establish with EDF Energy a robust process for ongoing monitoring of coastal change and Sizewell C's impacts. There should also be an obligation for EDF Energy to provide mitigation if actual change departs from anticipated baseline change. This will be difficult to achieve and will need to be backed by a strong legal document.
- 2.41 EDF Energy's interest is limited to the site, the construction and the operating period. However, the Councils, and in particular the District Council as coastal protection authority, must take into account both 'unintended consequences' of construction and it becoming a 'permanent' feature and its anticipated increasing impact on coastal processes exacerbated by climate change on the coastline and local communities.

Transport

- 2.42 Whilst the Stage 2 Consultation provides detail on the potential transport elements of the proposal, there is limited evidence to support the analysis that has been undertaken. Further clarification is required in a number of areas related to EDF Energy's traffic modelling and gravity model. With regard to transport, the draft response to EDF Energy highlights information that needs to be provided to the Councils in order for a more informed response to be made along with providing comments in regard to the proposed elements, and setting out the Councils' current position regarding the proposed mitigation.
- 2.43 The Councils remain supportive of a marine and/or rail maximised construction programme. It appears that the consultation offers either a rail or a marine maximised scenario. The Councils would urge EDF Energy to also fully investigate the option of both a rail and marine maximised scenario, and to indicate if that way the use of rail and marine transport could be further increased.
- 2.44 The Stage 2 Consultation does not provide assurances that either of these modes will ultimately be used, and as a result, the Councils remain unconvinced that the development impacts on the highway network will not be significantly greater than those identified in the Stage 2 Consultation, meaning that the impacts on the highway network may be grossly understated within their document. No evidence or supporting

information has been provided that the transportation of 60% of construction materials by rail/marine will be achieved. As a result of this lack of evidence, the Councils will continue to assume that a worst case of 90 to 100% will be transported by road as a basis for testing and assessment at this stage.

- 2.45 While the Councils support the principle of Park and Ride sites to transport workers to the development site, there is not enough evidence to determine whether the total number of car park spaces across the different sites (Park and Ride, on-site and at the accommodation campus) is required.
- 2.46 EDF Energy currently proposes not to have a Freight Management Facility, but instead have a traffic incident management facility at their southern Park and Ride site at Wickham Market. The Councils strongly encourage EDF Energy to reconsider the establishment of a Freight Management Facility at a different location along the A14, as was proposed in Stage 1, and not to proceed with the traffic incident management facility at Wickham Market.
- 2.47 EDF Energy propose road improvements at Farnham, the junction of the A12 and B1122 at Yoxford and of the B1122.
- 2.48 For the road improvements at Farnham, the Councils believe that EDF Energy's options 1 (no change), 2 (Farnham bend road widening) and 3 (Farnham bypass – a one village bypass) are unacceptable. Option 4, a 2 village bypass past Farnham and Stratford St Andrew, is seen by the Councils as the bare minimum mitigation.
- 2.49 Notwithstanding the above, the Councils remain committed to the objective of a four village bypass for Farnham, Stratford St Andrew, Little Glemham and Marlesford. However, we recognise that EDF Energy may not be the sole contributor to this scheme, as the full four village bypass cannot be justified based on the impacts of the Sizewell C development alone.
- 2.50 The Councils are seeking part Government funding to make the four village bypass scheme a reality. If successful, we will ask EDF Energy to contribute what they would otherwise have spent to help fund the two village bypass. We have already successfully persuaded Government to provide us with £1m to develop a business case for the scheme. This is of course no guarantee that it will lead to full funding, thus we will continue working with the New Anglia Local Economic Partnership (NALEP) and Government to seek confirmation of funding for this important scheme.
- 2.51 EDF Energy provide two options for junction improvements at the A12/B1122 junction at Yoxford, a signalised junction or a roundabout. It is not evidenced that either proposed option (signalised junction or roundabout) would work effectively, and there are some environmental and design concerns, so the Councils have not concluded on their preferred option and would like to engage further with EDF Energy on this.
- 2.52 EDF Energy confirm in their Stage 2 consultation the very substantial increases in traffic flows along the B1122, in particular in terms of HGVs and buses (EDF Energy forecasts 542%).
- 2.53 It should be recognised that the B1122 has a relatively light traffic load for being a 'B' road, and it is the significant change in traffic volumes and composition that gives rise to the extent of concerns, particularly for the residents of Yoxford, Middleton and Theberton. By contrast the Stage 2 proposals from EDF Energy make very modest changes to the road consisting of speed limits, pedestrian facilities and some alterations to road alignments.

- 2.54 The current proposals for the B1122 are in the Councils' view not sufficient to mitigate for the impact of increased traffic volumes. The Councils consider that, for the B1122 to work as the main access route to the site, significant further measures need to be undertaken to mitigate the impact on communities. EDF Energy is urged to look at alternatives, including those put forward in the AECOM report, and reconsider the Accent report.
- 2.55 EDF Energy do not refer to any further highway improvements in other locations. The Councils recognise that the development may have wider impacts on the A12, the A14 and the cross country routes and further work is required to consider what impact the construction phase is likely to have on parts of these roads and how it might be mitigated. This may need to look at capacity and the impact of larger numbers of slow moving vehicles. Examples include the section of the A12 from its junction with the A14 northward through to the A1214, the single carriageway section of the Woodbridge bypass, and the single carriageway section between Woods Lane and the Wickham Market bypass. Improvements may also be needed on rural roads and roads and public rights of way in and around Leiston, and mitigation for the impacts on the villages of Yoxford, Marlesford and Little Glemham needs to be considered.

Associated developments

- 2.56 The associated developments include the proposed accommodation campus, temporary caravan accommodation, two park & ride facilities, a new temporary rail terminal and a jetty and beach landing facility.
- 2.57 For the accommodation campus, EDF Energy now propose a single campus at the entrance of the main development site, near the junction of the B1122 and Eastbridge Road. This campus would accommodate up to 2400 bed spaces, along with ancillary facilities. EDF Energy propose three layout options in this location. Option 1 has the campus straddling both sides of Eastbridge Road, with up to 4 storey high buildings and sports facilities on site. Both option 2 (i) and 2(ii) have the accommodation buildings located east of Eastbridge Road only, with a height of up to 5 storeys. Option 2(i) features sport facilities on the west of Eastbridge Road, while Option 2(ii) proposes the sports facilities to be remotely located.
- 2.58 EDF Energy's preference is for a campus at the entrance site. This has operational advantages for EDF Energy with its workforce being essentially on site. While an on-site location has advantages in terms of reduced bus journeys throughout the build period, traffic impacts of an offsite location are expected to be comparably small if shuttle buses are used to move the workforce between the campus and the development site - as EDF Energy's own assessment of offsite campus accommodation at Hinkley Point C has shown.
- 2.59 While the Councils understand the rationale of an accommodation campus located at or close to the construction site, we remain concerned about the environmental impacts of the proposed site location, which may cause an overload on the sensitive environment of the AONB.
- 2.60 The Councils have pressed EDF Energy since Stage 1 to be supplied with the details of alternative options that have been considered. The Councils expect a review of potential alternative sites for the accommodation campus, to consider whether or not there are credible alternative sites in proximity of the development site, which potentially may be considered to have less environmental impact, more legacy potential and/or better community integration. The review should also consider alternative site layouts for the

proposed site, such as a layout that spreads the development to the whole of the site area of option 1 without the sports facilities, to achieve lower level accommodation units.

- 2.61 Whilst it may well be concluded that there are no credible alternative sites, the Councils cannot come to a final view on this matter either way until all other options in proximity to the construction site have been considered and fully evaluated, including the option of split sites. Further information, therefore on the business case for a campus in this location will be expected to be provided. In such a business case, EDF Energy will be expected to provide details on alternative sites that have been considered during the pre-application process and a detailed justification of the proposed size of the campus, in terms of its maximum numbers. Proposals should also be provided to enable an increase and reduction of its size during the build appropriate to the employee numbers on site.
- 2.62 For any accommodation campus site, the Councils believe that sports facilities for campus residents should be provided at a site in Leiston, in order to provide benefit and legacy to the local community.
- 2.63 There will be significant advantages to having the leisure facilities located within the town. Leiston's Neighbourhood Plan has also recently lead to the approval of up to 500 dwellings in the town; the town is thus growing. The Councils and the Town Council have put in place a programme called Leiston First to help develop and regenerate the town. The Councils propose that there are significant cumulative benefits to coordinating these development opportunities in the town to make the town more vibrant and strong. The Councils will welcome positive engagement with EDF Energy and others to embed these opportunities.
- 2.64 In addition to the accommodation campus, EDF Energy propose a temporary caravan accommodation site to the East of Eastlands Industrial Estate. The Councils support the principle of caravan accommodation, but require further information on the assessment of alternative sites, and the proposed site design.
- 2.65 EDF Energy propose to build two Park and Ride facilities, one North and one South of the development site, to transport workers to the site. Each is proposed to have 900-1000 spaces.
- 2.66 The Councils are content with the proposed Northern site at Darsham, subject to satisfactory access arrangements, with a useful location next to the railway station.
- 2.67 In the draft response, for the Southern Park and Ride Site, the Councils would would request consideration of sites further south of Woodbridge, closer to Ipswich, to reduce the number of cars on the road in the Woodbridge area. If EDF Energy consider the Wickham Market site further, there may need to be improvements to the A12 between the dualled sections of the Wickham Market and Martlesham bypasses.
- 2.68 EDF Energy propose two options for rail terminals – a temporary extension of the Saxmundham-Leiston branch into the construction site (referred to as “the green route”) or a new temporary rail terminal and freight laydown east of Eastlands Industrial Estate. The Councils' current preference is for the green route, as this will reduce traffic through Leiston and on Lovers Lane.
- 2.69 EDF Energy are considering three options with regard to marine landing facilities, which are dependent on the decision of the modal split (rail/marine): A temporary wide jetty, a temporary narrow jetty and/or beach landing facility. The Stage 2 consultation provides inadequate information in order for the Councils to give a preference. Further

assessments around the impacts on coastal processes, landscape impacts and marine ecology is required, as well confirmation of modal split.

NEXT STEPS

- 2.70 It has been four years since the Stage 1 Consultation and it is clear from the contents of this Stage 2 Consultation that the project has not significantly moved forward in terms of the detail that is publically available. This has frustrated many communities and indeed the Councils who are keen to understand how the project is going to affect Suffolk with the realisation that there is still a significant amount of work for EDF Energy to undertake.
- 2.71 The recommended response in the Appendix clearly sets out all the areas of concern and/or where there is significantly more information required. As disappointed as many are with the current consultation detail it is not a process upon which the councils have any direct influence. Therefore, the councils will look to the work programme for 2017 and beyond and appreciate that as a consultee we are not the decision maker but we can collaborate with all parties to maximise the benefits for the area and influence positive outcomes.
- 2.72 The Town and Parish Council events have provided the clear view that they expect the Councils to provide local leadership to maximise the opportunities and minimising local impacts, whilst understanding there will be significant disruption/harm during construction. It was also acknowledged that some communities will be affected more than others by the development and that some, close to the site, will have potential construction impacts for many years that can't be fully mitigated. It has to be accepted that it would be impossible to develop this nuclear station without any impacts but the benefits for our area and economy are significant and it is a matter for the councils to properly balance the benefits versus harm for the wider good of the area.
- 2.73 Against this background it should also be understood that whilst there is no certainty on timescales for this development the Councils have to be prepared for the process to move forward quickly. It has already been stated that Stage 3 may occur in early 2018. Hinkley Point C is under construction and it has been cited that there are economies of scale savings to be derived from the phasing of the developments at Hinkley and Sizewell. That being the case we need to ensure we are fully prepared for the next stages. This is especially so with the "once in a generation" opportunity to seek to secure the full Four Villages Bypass as part of the Suffolk Energy Gateway ahead of the required need for A12 mitigation required for Sizewell C.
- 2.74 It is therefore recommended that the Cabinets endorse the need for significant local engagement through 2017, working closely with Towns and Parish Councils, and other groups/bodies, as required, to develop an evidence base on the impacts of all aspects of the proposal and develop the mitigation/compensation options.
- 2.75 To deliver infrastructure of this scale effectively, alongside other large infrastructure projects in Suffolk, the Sizewell C development requires EDF Energy, the local Councils and Government to work closely together to minimise negative impacts and maximise opportunities locally. In order to achieve this, it is recommended that officers and Members continue to engage with Government, including through the Suffolk Energy Coast Delivery Board chaired by Therese Coffey MP, to maximise the benefits from the development. This includes:

- a. That the Councils continue to further develop proposals for a four-village-bypass as part of the Suffolk Energy Gateway, and Councils continue to persuade Government to provide funding for this.
- b. That the Councils work with Government and relevant agencies on additional requirements for infrastructure to accommodate Sizewell C alongside other significant strategic developments in Suffolk;
- c. To persuade Government for the maximum level of community benefits for Suffolk, including but not limited to consideration of maximising the amount of business rates arising from Sizewell C to be retained in Suffolk
- d. To continue working closely with the Suffolk Energy Coast Delivery Board, MPs and other partner organisations to seize the maximum of opportunities for skills and employment in Suffolk

- 2.76 Alongside this local and national engagement, the Councils' officers will continue to work closely with EDF Energy and will be able to input the emerging specific local issues favoured through the local engagement into their process for consideration.
- 2.77 This has staffing implications for the Councils in order to be able to fully embrace all the work required to be undertaken, as well as provide the reassurance/confidence for these communities that their local concerns are recognised as part of the delivery of the whole project.
- 2.78 Currently the funding of officer time for the pre-application process is funded via a Planning Performance Agreement (PPA) that funds officer time directly attributable to work EDF Energy require to help them develop their plans. It is considered that this PPA needs to be reviewed, and this is a point acknowledged by EDF Energy. As part of the consideration of the PPA it is known that funding from promoters of other nuclear sites in the country are providing more funds to their host local authorities than in Suffolk. Whilst any input from the councils needs to be evidenced it is clear from comparing other sites to our own input with regards to costs it is necessary for more officer/consultant time to be provided.
- 2.79 However, the funding of work that is not directly relevant/attributable to the preparation of the Development Consent Order (DCO) submission for EDF Energy will not be funded from the PPA. It should be noted therefore that additional funding from the Councils' own resources may be required to develop a comprehensive engagement process over the next few years.
- 2.80 In addition, the current PPA arrangements are only covering costs in the pre- application process. The DCO submission and examination will take up significant officer time. There is also a likely need for legal representation to at least help in the preparation and drafting of S106 agreements and evidence preparation.
- 2.81 If the development was consented and the scheme was to be delivered it would fall to the District Council (or East Suffolk DC if Suffolk Coastal and Waveney District Councils will have merged by then) to manage the discharge and monitoring of the Requirements (planning conditions). Fees for the work can be resolved through the process but it is a matter that does need to be considered.

3 HOW DOES THIS RELATE TO EAST SUFFOLK BUSINESS PLAN?

East Suffolk Business Plan 2015-2023:

- 3.1 Enabling communities: People who feel included and proud of where they live; Having strong links to other places and communities.
- 3.2 Economic Growth: The proposed new Sizewell C nuclear power station provides a huge opportunity for growing the East Suffolk economy. At the peak of the construction, some 5,600 people will be employed at the site, with there being about 900 people employed there when the power station is up and running. The Councils will continue to work closely with EDF Energy and a wide range of partners to maximise the economic benefit of this development, while minimising and managing any negative impact.
- 3.3 Specific action for Suffolk Coastal: Advocate on behalf of communities & local stakeholders to maximise the local economic, community and environmental benefits & opportunities from the Sizewell C development.

- 3.4 Specific action for Waveney: Deliver the first 5 year proposals contained within the Lowestoft Transport & Infrastructure Prospectus which will address the infrastructure constraints that are acting as a brake on economic and housing growth.

4 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 4.1 The direct financial implications of this project, in terms of officer and related time, for the two Councils are discussed in the Next Steps section from para 2.78 above.
- 4.2 A Sizewell C Nuclear Power Station would bring significant financial opportunities to Suffolk. The development is expected to generate a £100m pa investment boost to the regional economy during construction and £40m pa during operation. It would strengthen the Suffolk economy and employment market, and a package of mitigation and compensation would have a lasting legacy.
- 4.3 The development could provide significant additional business rate income to the local councils; however, Government has not yet provided clarity on the proportion of business rate that can be retained in Suffolk. Cabinet is recommended to agree further lobbying of Government to aim for maximum business rate retention, as a further compensation for the local community.
- 4.4 When making its decisions, Cabinet should consider the risks related to its response to EDF Energy. If the response is not robust and ambitious enough, Suffolk may risk not achieving adequate mitigation for the development. Inadequate mitigation could have a significant damaging impact on the local environment, local communities, the transport network or tourism and other industries. However, if the response puts unrealistic demands on EDF Energy, the Councils' views are less likely to influence EDF Energy in the further development of their plans, or to be taken fully into account by the Planning Inspectorate.
- 4.5 Additionally, there is a risk that Sizewell C will not progress to development, which would mean that the efforts put into working with EDF Energy would have been wasted.

5 OTHER KEY ISSUES

- 5.1 This report has been prepared having taken into account the results of an Equality Impact Assessment, a Sustainability Impact Assessment and a Partnership Impact Assessment. These are listed as Background Papers.

6 CONSULTATION

- 6.1 This Cabinet report sets out the Suffolk Councils' Joint Response to EDF Energy's consultation. Whilst this is not a consultation process for which the Councils are responsible, there has been a very comprehensive approach to engaging with key stakeholders and community representatives ahead of finalising the Councils' response.
- 6.2 Post Stage 1 consultation, there was an extended period of limited new information being put forward by EDF Energy, and thus the public interaction was more limited, primarily focussed on widely circulated newsletters and EDF Energy's team attending a series of town and parish meetings.
- 6.3 In early 2015 the Councils held an engagement event with those Town and Parish Councils in East Suffolk that relate to the Sizewell C development in preparation for the next stage of formal consultation, which was led by lead members of the two Councils and key officers. The key message from this event was the need for the Councils to

provide leadership for the communities and the Town and Parish Councils so an effective response could be made by Suffolk. This event was followed by a short series of workshops where key issues were discussed with representatives of Town and Parish Councils facilitated by supporting officers. East Suffolk hosts a Sizewell C website (with a link from the County Council's website) that includes all necessary documentation and includes [feedback](#) from these events.

- 6.4 Despite the Councils having urged EDF Energy to extend it, the Stage 2 consultation period has been short and included the Christmas period. As a result, there has been limited opportunity to receive the full views of local communities.
- 6.5 However, since Stage 1, the Councils have been in continued conversation with local communities and other key stakeholders. There has also been ongoing engagement with EDF Energy through a series of planned workshops under a Planning Performance Agreement (PPA) which is in place to provide support for the Councils to comment on and inform on emerging proposals. Members of the two Councils have also met with local specific interest groups and representatives of anti-nuclear groups to understand and discuss their issues.
- 6.6 The Councils held a community engagement event in December 2016, where all Town and Parish Councils in the vicinity of the proposed development were invited to contribute their views to the Councils' response. The event allowed Lead Members and officers to gain valuable insight and detail into the concerns of the local communities, and [the information received](#) allowed us to make a more comprehensive response, influencing the recommendations as set out in this report.
- 6.7 To support Town and Parish Councils to prepare their responses to the Stage Consultation, the Councils agreed with EDF Energy that they fund Planning Aid, an organisation that offers independent and professional town planning advice and support to communities, to provide assistance.
- 6.8 The two Councils are committed to continuing their engagement with Town and Parish Councils following on from the Stage 2 consultation. Over the next year, we will seek their views on all aspects of the proposal and help develop appropriate mitigation approaches for their area, to gain a robust local perspective on the issues.
- 6.9 Noting the short consultation period of the Stage 2 consultation, the Councils urge EDF Energy to allow significantly more time for the Stage 3 consultation. Given the large amount of material expected to be submitted at Stage 3, the Councils feel they would need a significantly longer period, of at least 12 weeks, or 14 weeks if over a (defined) major public holiday, in order to be able to provide EDF Energy with a response of a quality that will help EDF Energy to move their proposals forward.

7 OTHER OPTIONS CONSIDERED

- 7.1 Cabinet may wish to consider a different stance on some of the issues raised in the draft response to EDF Energy, and / or propose different or additional wider engagement activities with Government and other key stakeholders to further enhance the outcomes of the proposed development for Suffolk.

8 REASON FOR RECOMMENDATION

- 8.1 The recommendations below are based on many months of work led by the Deputy Leader for Suffolk Coastal District Council, and the Member with Responsibility for

Outside Bodies for Suffolk County Council in the lead up to and during the Stage 2 consultation. They present the Councils' proposed options and opinions on the way forward based on the information supplied by EDF Energy through their public consultation.

RECOMMENDATIONS

1. **That the Council should respond to the EDF Energy Stage 2 Consultation, and agree the approach to Government and key partners to maximise the benefits of the proposed development.**
2. **That following agreement by the Cabinets of Suffolk County Council and Suffolk Coastal District Council (referred to as "the Councils" in the recommendations below), the response set out in detail in the Appendix and summarised below will be submitted jointly, and that both Councils continue engagement with Government and key partners as set out below:**
3. That EDF Energy is informed that, in line with previously determined policy, the Councils continue to support the principle of a new nuclear power station at Sizewell, recognising the significant benefit that such a development would bring to Suffolk. However, based on the information put forward in the Stage 2 Consultation, the Councils are not yet able to fully support the specific proposals by EDF Energy, as the impacts of the proposed development are not yet fully developed or evidenced. As such it is not possible to confirm a definitive position on many aspects of the emerging scheme nor comment fully as to whether the impacts have been appropriately mitigated or compensated. Therefore, the Councils are not yet fully convinced that the benefits of EDF Energy's proposals are considered greater than the impacts. We will welcome the opportunity to further engage with EDF Energy to help them develop their proposals, including seeking to mutually resolve the necessary mitigation and compensation. In particular, the Councils wish to note:
 - a. That the Councils support the following options put forward in the consultation:
 - i. We support the aspirations set for the socio-economic areas, although we ask EDF Energy to be even more ambitious in increasing the percentage of locally based workers (see also recommendation 3.c.iii. below);
 - ii. With regard to road improvements of the A12 in Farnham, the Councils agree with proposed option 4, for a 2-village bypass for Farnham and Stratford St Andrew, as the bare minimum mitigation at Farnham. The other three options put forward in the Stage 2 Consultation should be discarded;
 - iii. With regard to the options for the site access crossing over the SSSI, subject to further information, the Councils currently prefer option 3, the three span bridges, as this would be likely to have the least ecological impact;
 - iv. The Councils accept the proposed site for the Northern Park and Ride at Darsham, subject to satisfactory access arrangements;
 - v. With regard to the rail options, the Councils prefer option 1, the temporary extension of the Saxmundham-Leiston branch line into the construction site (the "green route").
 - b. That, in the absence of further details, the Councils are not yet content with the following proposals put forward in the Stage 2 Consultation and would welcome

further engagement with EDF Energy to develop appropriate solutions:

- i. Due to a lack of information on the proposals and an absence of assessments of alternative options, the Councils do not support borrow pits and the proposed level of stockpiling due to its impact on the sensitive environment of the AONB and Minsmere, unless there is evidence that a) alternative options have been fully considered, including whether the option of moving soil to the RSPB site at Wallasea Island, which EDF Energy refer to as a fall back option, remains possible (see reference to Court of Appeal judgement in paragraph 2.39) and b) it is proven that the preferred approach does not have an unacceptable impact on the AONB and any impacts can be appropriately mitigated or compensated for;
 - ii. With regard to the platform footprint and position, we note that the proposed footprint is further seaward than Sizewell B, and that indicated at Stage 1, which gives the Councils significant concerns around the impact on coastal processes and coastline and may make this design unacceptable. Coastal process impacts have not been assessed in full, and neither have alternatives (such as moving the platform back inland, or redesigning the layout) been explored in Stage 2;
 - iii. With regard to rail or marine max scenarios, the Councils urge EDF Energy to maximise both rail and marine transport to and from site;
 - iv. With regard to the proposed B1122 road improvements, these are not seen as appropriate mitigation, and EDF Energy is urged to consider alternatives;
 - v. While the Councils understand the rationale of an accommodation campus located at or close to the construction site, we are unable to confirm our preferred location/layout due to lack of information and full appraisal of alternative site locations, as well as alternative layouts of the currently proposed site. The Councils are concerned about the environmental impact of the proposed location, particularly on the AONB. The Council strongly supports that the sports facilities, as part of any campus development, should be located in Leiston;
 - vi. Similarly, while recognising the principle of temporary caravan accommodation, further information is required on the assessment of alternative sites and proposed site design;
 - vii. With regard to the Southern Park and Ride site, the Councils would request consideration of sites further south of Woodbridge closer to Ipswich, as stated in the Stage 1 consultation;
 - viii. With regard to a Freight Management Facility, the Councils strongly encourage EDF Energy to reconsider its stance on the establishment of such a facility.
- c. That in the following areas EDF Energy has not provided enough detail for the Councils to come to a view and we would welcome early engagement with EDF Energy on these:
- i. Traffic modelling and gravity model: The Councils require further clarification in a number of areas;
 - ii. Modal split: No evidence or supporting information has been provided that

the transportation of 60% of construction materials by rail or marine can be achieved. The Councils' modelling must assume a worst case scenario, which, due to lack of evidence on feasibility of marine/rail modes, is assumed at 90 to 100% transport by road. Without this information it is not possible for the Highways Authority to make an evidence based assessment of EDF Energy's transport proposals;

- iii. Socio-economic aspects: More information is required on the delivery mechanisms to achieve the socio-economic aspirations and mitigations. The current assessment of the adverse economic impacts, on tourism and other industries, are not thorough enough. Further detail is required to determine and mitigate the impact of the proposal on public services, to ensure that the Councils and partners can effectively deliver its services to this increased population alongside Suffolk's current residents;
- iv. The design of Sizewell C: The Councils remain deeply concerned about the quality of the design of Sizewell C, given its location in an Area of Outstanding Natural Beauty, and expect improvement in the design and, where it is not possible to improve the design quality, a compensation package to compensate for the lasting impact on and damage to the Area of Outstanding Natural Beauty. However, no further detail about the design has been provided since Stage 1.
- v. Platform height: While the proposed platform height has been confirmed, no further detail is available on the possible environmental impact of the resulting significant increase to the weight of the platform.
- vi. Ecological surveys and mitigation: There needs to be further significant work to seek to survey, understand, quantify and qualify and mitigate impacts of the development on the ecology.
- vii. Coastal processes: Further assessments are required. The Councils expect to establish with EDF Energy a robust process for ongoing monitoring of coastal change and Sizewell C impacts, with an obligation for EDF Energy to provide mitigation if actual change departs from anticipated baseline change.
- viii. Post construction masterplan: This has not been advanced since Stage 1.
- ix. Car park spaces: There is not enough evidence that the total number of proposed car park spaces, at Park and Ride sites, on site and at the accommodation campus, is required;
- x. Junction improvements at Yoxford A12/B1122: It is not evidenced that either proposed option (signalised junction or roundabout) would work effectively
- xi. Marine Facilities: The consultation asks for a preference for a wide or narrow jetty, but there is not sufficient information on the implications of either to come to a view on the Councils' preference.
- xii. The Sizewell C development will have a significant impact on the Leiston Household Waste Recycling Centre (Lovers Lane IP16 4UJ) by increasing congestion, leading to increased risk of queuing along Lovers Lane. The County Council will seek early discussions about how the impact can be mitigated so that Leiston and the surrounding area can continue to receive a

good recycling service.

- d. That the following areas of mitigation or compensation have not been covered by EDF Energy in their Stage 2 consultation:
 - i. Highway improvements at key pinch points of A12, as well as impacts on Leiston and rural roads
4. That the Councils urge EDF Energy to allow for a significantly longer consultation period for the Stage 3 consultation, of at least 12 weeks (14 weeks if over a defined major public holiday), noting the short consultation period of the Stage 2 consultation, and given the large amount of additional documentation expected to be submitted at Stage 3.
5. That the lead officers (Head of Planning & Coastal Management at Suffolk Coastal District Council and the Assistant Director for Infrastructure and Waste at Suffolk County Council) in consultation with their respective lead members (the Deputy Leader for Suffolk Coastal District Council, and the Cabinet Member for Environment and Public Protection in conjunction with the Member with Responsibility for Outside Bodies for Suffolk County Council) be authorised to make any amendments to the draft response as agreed with the appropriate representatives of Suffolk County Council/Suffolk Coastal District Council.
6. To effectively deliver infrastructure of this scale, alongside other large infrastructure projects in Suffolk, the Sizewell C development requires EDF Energy, the local Councils, the Local Economic Partnership and Government to work closely together to minimise negative impacts and maximise opportunities locally. In order to achieve this, it is recommended that officers and Members continue to engage with Government, including through the Suffolk Energy Coast Delivery Board chaired by Therese Coffey MP, to maximise the benefits from the development. This includes:
 - a. That the Councils continue to further develop proposals for a four-village-bypass as part of the Suffolk Energy Gateway, and the Councils aim to persuade Government to provide funding for this;
 - b. That the Councils work with Government and relevant agencies on additional requirements for infrastructure to accommodate Sizewell C alongside other significant strategic developments in Suffolk;
 - c. To persuade Government to make the maximum level of community benefits for Suffolk available, including but not limited to consideration of maximising the amount of business rates arising from Sizewell C to be retained in Suffolk;
 - d. To continue working closely with the Energy Coast Delivery Board, MPs and other partner organisations to maximise the opportunities for skills and employment in Suffolk.
7. That the Councils continue to engage closely with all key partners to develop an evidence base on the impacts of all aspects of the proposal and develop the mitigation/compensation options, including:
 - a. Significant local engagement, working closely with Town and Parish Councils, and other groups/bodies, as required, to develop a local evidence base;
 - b. Further work on the environmental impact of the development with the key environmental government bodies, including Environment Agency and Natural England, and with non-governmental organisations such as the National Trust, the Suffolk Wildlife Trust and the RSPB;

- c. Further collaboration with the relevant organisations, including Chamber of Commerce and the New Anglia Local Economic Partnership, in partnership with EDF Energy, on maximising, skills and employment opportunities in Suffolk and the region, as well as engagement with Essex local authorities in relation to additional economic and employment opportunities from the possible presence of two new nuclear power stations (Bradwell B as well as Sizewell C) in the region.
8. That the Councils negotiate with EDF Energy to secure an improved Planning Performance Agreement to ensure resources are available to provide the necessary input into securing acceptable standards of mitigation for the development and to help ensure the councils can respond on behalf of local communities to deliver the significant benefits from the development in a timely way to accord with EDF Energy's programme. Cabinet is asked to note that not all of the Councils' engagement can be funded through the Planning Performance Agreement, and additional Council funding and staff resources may be required to maintain a comprehensive engagement process over the next few years.

APPENDICES

Appendix A	Joint response to EDF Energy's Stage 2 Consultation from Suffolk County Council and Suffolk Coastal District Council
Appendix B	Maps showing proposed Main and Associated Development Sites
Appendix C	Unconfirmed minutes of the Sizewell C Task Group meeting held on 11 th January 2017 where it considered the consultation documents.

BACKGROUND PAPERS

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

Date	Type	Available From
	EDF Energy Stage 2 Consultation documents	http://sizewell.edfenergyconsultation.info/szc-proposals/stage-2/
	Department of Energy and Climate Change: National Policy Statements: Overarching Energy (EN 1) Nuclear Power Generation (EN 6)	http://www.decc.gov.uk/en/content/cms/meeting_energy/consents_planning/nps_en_infra/nps_en_infra.aspx

	Planning Inspectorate Scoping Opinion as required by the Environmental Impact Assessment (EIA) regulations	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-000093-Sizewell C Proposed Nuclear Development Scoping Opinion.pdf
	Feedback from Town and Parish engagement event 2015	http://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/JLA-response-to-Sizewell-C-town-and-parish-events-2015.pdf
	Feedback from Town and Parish engagement event 2016	http://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/community-engagement/stage-2-high-lodge-darsham-6-december-2016/
4.11.2008	Cabinet paper and minutes CONSULTATION ON STRATEGIC SITING ASSESSMENT PROCESS AND SITING CRITERIA FOR NEW NUCLEAR POWER STATIONS IN THE UK	Available on request from katherine.potts@eastsuffolk.gov.uk
2.2.2010	Cabinet paper and minutes: CONSULTATION ON DRAFT NATIONAL POLICY STATEMENTS FOR ENERGY INFRASTRUCTURE	Available on request from katherine.potts@eastsuffolk.gov.uk
5.2.2013	Cabinet paper and minutes: RESPONSE TO EDF'S SIZEWELL C STAGE 1 PUBLIC CONSULTATION	Available on request from katherine.potts@eastsuffolk.gov.uk
11.1.2017	Equality Impact Analysis Form	Available on request from katherine.potts@eastsuffolk.gov.uk

11.1.2017	Partnership Impact Assessment	Available on request from katherine.potts@eastsoffolk.gov.uk
12.1.2017	Sustainability Impact Assessment	Available on request from katherine.potts@eastsoffolk.gov.uk