

Report Author Checklist

Before submitting this report to Democratic Services:

1. Please confirm you have:

	Please confirm 'yes' below
Prepared the report in accordance with the Cabinet Report Writing Guidelines	Yes
Included the Equality Impact Assessment (or information on why one is not required) in the report as instructed in the Report Writing Guidelines	Yes (not required)

2. Please confirm that the FINAL version of the report has been cleared by:

	Date cleared:
The Assistant Director	25/02/2019
The Director	22/02/2019
The Cabinet Member	25/02/2019
The Head of Legal Services	25/02/2019
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Cabinet

Report Title:	Response to EDF Energy's Sizewell C Stage 3 Public Consultation
Meeting Date:	12 March 2019
Lead Councillor(s):	Councillor Richard Smith MVO, Cabinet Member for Finance and Assets and Lead Cabinet Member for Sizewell C
Local Councillor(s):	Suffolk-wide, but in particular Aldeburgh and Leiston – Councillor Russ Rainger Blything – Councillor Richard Smith MVO Carlford - Councillor Robin Vickery Felixstowe North and Trimley – Councillor Stuart Bird Framlingham – Councillor Stephen Burroughes Martlesham – Councillor Patricia O'Brien Wickham – Councillor Alexander Nicoll Wilford – Councillor Andrew Reid Woodbridge – Councillor Caroline Page
Director:	Mark Ash, Director of Growth, Highways and Infrastructure
Assistant Director or Head of Service:	Bryn Griffiths, Assistant Director, Infrastructure & Waste
Author:	Michael Moll, Programme Director Sizewell C / Lisa Chandler, Suffolk Coastal District Council

Brief summary of report

1. EDF Energy is proposing to build a new nuclear power station at Sizewell and has launched its Stage 3 consultation for the proposal. Stage 3 is the final planned consultation phase for Sizewell C 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.
2. This report sets out a summary of the draft response to EDF Energy's Stage 3 consultation, with the full draft response in the appendix, as well as recommendations as to how we should work with other partners to maximise opportunities and minimise impacts of the development. It is proposed that Suffolk County Council and Suffolk Coastal District Council (referred to in this report as "the Councils"), both statutory consultees in this process, submit a joint response to the consultation, as they have done in the two previous consultation stages. It is considered that such a joint response gives greater weight to the views of the two Councils.
3. This report summarises the progress made in some areas since the Stage 2 consultation, explains key changes in the proposals, and highlights concerns and gaps in the evidence base provided by EDF Energy. The report considers whether or not sufficient progress has been made to enable Suffolk County Council to support the development. Suffolk Coastal District Council has taken

a similar report with the same response attached to their Cabinet meeting on the 11 March 2019.

4. Members are asked to consider and if they are content to endorse the responses set out in this report and 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.
5. Cabinet Members have been provided with copies of EDF Energy's consultation documents. They are also available on EDF Energy's website at <https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/proposals/stage-3>
6. To understand the whole impact of this proposal on Suffolk, this report should be read in conjunction with the Cabinet report "Consultation by Scottish Power Renewables on East Anglia Offshore Windfarms One (North) and Two", discussed at this same Cabinet meeting. Some of the recommendations are common or similar to both reports but have been included in each report so that each can be read as a stand-alone document.

What is Cabinet being asked to decide?

7. That Suffolk County Council responds to the EDF Energy Stage 3 consultation and agree an approach to Government and key partners to maximise the benefits of the proposed development. This recommendation is aligned to a report being taken to Suffolk Coastal District Council's Cabinet on 11 March 2019.
8. That this Council seeks to focus Government and all the promoters on the in-combination effects of Sizewell C and proposals related to Offshore Wind projects and National Grid interconnectors in the Leiston area. The Council to seek commitments from Government, EDF Energy and the other promoters to explain how the in-combination effects will be addressed.
9. That following agreement by the Cabinet of Suffolk County Council (and by Suffolk Coastal District Council on 11 March 2019), the response set out in detail in the Appendix and summarised below will be submitted jointly, and that both Suffolk County Council and (subject to its meeting on 11 March 2019) Suffolk Coastal District Council continue engagement with Government and key partners as set out below.
10. That EDF Energy, in line with previously determined policy, be informed that this Council continues to support the principle of a new nuclear power station at Sizewell, recognising the significant benefit that such a development would bring to Suffolk.
11. That EDF Energy be furthermore informed that this Council is disappointed that the Stage 3 proposals have not evolved more considerably since Stage 2, particularly given the time that has been available and that this is the final public consultation. There remain a considerable number of issues to be addressed between Stage 3 and submission of the Development Consent Order (DCO). At this stage there are still some areas where this Council is not content, cannot come to a clear view or has been unable to update its response since Stage 2.
12. That based on the new information put forward in the Stage 3 Consultation, this

Council is still not able to support all the specific proposals put forward by EDF Energy and the impacts of the proposed development are still not yet fully developed or evidenced. This Council expects to work with EDF Energy towards a position where its Cabinet can conclude that on balance the advantages of EDF Energy's proposals outweigh the disadvantages. This Council will work with EDF Energy to help it address the issues identified below and to develop its proposals, including seeking mutually to resolve the necessary mitigation and compensation. In particular, this Council wishes EDF Energy to address the following points:

- a) To make the development deliverable in Suffolk and address areas of considerable public concern, there are a number of issues that EDF Energy needs to address. This Council is not content with the following aspects of the proposal:
 - i) The dropping of a marine-led materials transport strategy with the introduction of a road-led strategy alongside the alternative of a rail-led option. The Council continues to support marine-led and rail-led transport strategies and has not yet seen convincing evidence that a marine-led strategy is not feasible and/or environmentally preferable. If the marine-led option is proven to be impossible, the Council wishes to see the rail-led strategy implemented. The Council is not content with a road-led option, with the significant number of additional Heavy Goods Vehicles (HGVs) resulting in a detrimental effect on Suffolk's road network. This Council is not content with the possibility of a relaxation of HGV operating hours into the night time.
 - ii) The introduction of four tall pylons to the development site, which would have considerable detrimental impact on the Suffolk Coast and Heath Area of Natural Beauty (AONB);
 - iii) The introduction of additional permanent development AONB, including the proposal of a training centre and outage car parking on Goose Hill;
 - iv) The mitigation proposals for Wickham Market – while this Council welcomes the recognition of potential delays on the B1078 in Wickham Market as a result of additional Sizewell C traffic, the two proposed options for mitigation (removal of on-street car parking in Wickham Market or a diversion route via the narrow, weight restricted and listed Glevering Bridge) are not appropriate.
- b) That, due to a lack of further detail and/or enough evidence, the Councils are not yet able to come to a considered view regarding the following topic areas put forward in the Stage 3 Consultation, and would welcome further engagement with EDF Energy to consider more appropriate solutions:
 - i) Socio-economic impacts: While the Stage 3 consultation recognises the areas of work and impacts that need to be addressed, more information is required on the delivery mechanisms to achieve sufficiently ambitious socio-economic aspirations and mitigations, including employment opportunities for local residents and supply chain opportunities for local businesses. EDF Energy need to further detail their assessment of the adverse economic impacts on tourism and other industries, and provide further detail to determine and

mitigate the impact of the proposal on public services;

- ii) Mitigation proposals for a possible increase of the expected workforce from 5,600 + 500 to 7,900 + 600, as part of EDF Energy's sensitivity testing: To consider the acceptability of an increase of the workforce number beyond 5600, this Council expects deliverable and enforceable mitigation proposals, to avoid or mitigate impacts on the local housing market, the local workforce and transport infrastructure. This Council does not accept that the consultation suggests that an increase of the workforce to up to 7900 does not create any additional traffic impact as suggested;
- iii) Ecological surveys and mitigation: EDF Energy need to undertake further significant work to seek to survey, understand, quantify and qualify and mitigate impacts of the development on the ecology;
- iv) The platform footprint and position: This Council highlighted at Stage 2 that the proposed footprint is further seaward than Sizewell B, which gives this Council significant concerns around the impact on coastal processes and coastline and may make this design unacceptable. The Council needs to see a full assessment of the coastal process impacts and an assessment of alternatives (such as moving the platform back inland, or redesigning the layout);
- v) Coastal processes: EDF Energy need to undertake further assessments, and establish with this Council a robust process for ongoing monitoring of coastal change and Sizewell C impacts, with an obligation for EDF Energy to provide mitigation if actual change departs from anticipated baseline change;
- vi) The design of the proposed nuclear power station: Whilst improvements have been made to the design of some non-nuclear buildings (see c) iii) below), this Council remains concerned about the overall design of the site, and requests that the nuclear power station design is independently reviewed through the Design Council (formerly known as CABE);
- vii) The site access crossing over the Site of Special Scientific Interest (SSSI): This Council requires further evidence to show why EDF Energy has chosen the causeway with culvert as its proposed scheme above the three-span bridge, which was the Council's preference at Stage 2;
- viii) The Beach Landing Facility: While this Council supports the principle of a Beach Landing Facility to allow deliveries of large items via sea, EDF Energy needs to provide appropriate levels of detail and evidence on the impacts and practicalities of such a facility, addressing concerns including impacts on coastal processes, ecology, landscape and access to the beach and the England Coast Path;
- ix) The proposed redevelopment of the Northern Mound: Further detail and impact assessments need to be provided;
- x) The spoil management proposals: This Council requires additional information and evidence to convince it that the proposed borrow pits

and stockpiling will not have an unacceptable impact on the sensitive local environment (including on the AONB and the Royal Society for the Protection of Birds (RSPB) Minsmere) and on neighbouring land uses;

- xi) The location of the accommodation campus remains a local concern: EDF Energy is requested to provide further evidence to demonstrate why it considers its favoured location to be the optimal location. This Council would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. This Council would like EDF Energy to also reconsider the nearby Leiston airfield site as an alternative location for the campus. Subject to receipt of that justification, whatever accommodation campus site is chosen the evidence will need to prove that environmental impacts can be sufficiently mitigated and compensated for;
- xii) Land east of Eastlands Industrial Estate (LEEIE): While this Council is content with the principle of operational construction use of the LEEIE, it has concerns regarding the number of different uses proposed and the relationship between these. EDF Energy needs to provide evidence that the site can be appropriately drained from a surface water perspective, does not include overdevelopment of the caravan site, and can provide mitigation for potential detrimental environmental health impacts on neighbouring residents;
- xiii) Surface and ground water impacts: EDF Energy is asked to provide detailed proposals on drainage and dealing with surface water. It needs to provide assessments on potential impacts on ground water, and evidence that the development does not result in unacceptable impacts on groundwater levels and related biodiversity (including from an increase in weight of the platform as a result of its increased height);
- xiv) Impact on the Leiston Household Waste Recycling Centre in Lovers Lane: EDF Energy is asked to discuss with the County Council how to mitigate the impact of increased traffic on Lovers Lane on the Recycling Centre so that Leiston and the surrounding area can continue to receive a good and safely delivered recycling service;
- xv) Notwithstanding paragraph a) i) regarding this Council's overall concerns over the transport strategy, this Council considers that for the following aspects of a rail-led, road-led or indeed marine-led proposal, lack of sufficient evidence means this Council cannot come to a considered view on:
 - i) The suitability of proposed traffic mitigation measures: This Council requires further clarification in several areas related to EDF Energy's traffic modelling and gravity model to determine whether the traffic mitigation measures are enough. The Councils require evidence to explain the modelled HGV numbers, to justify the assumption of a split of 85% of materials coming from the South and 15% from the North, and an indication of the number of Abnormal Indivisible Loads (AILs) arriving by road and by sea.

- ii) The route of the proposed Sizewell Link Road from the A12 to the development site in the road-led strategy: The provision of a relief road for the B1122 is welcome but the option proposed is yet to be supported by sufficient evidence. The case to justify the best possible route must revisit all the routes considered by the promoter with a comprehensive highways analysis and be mindful of any impact on allocations in the District Council's Local Plan and any other potential developments;
 - iii) The requirement for road and junction improvements in addition to those proposed in Stage 3: EDF Energy is asked to develop mitigation proposals for additional traffic pinch points affected by Sizewell C construction traffic which have not been covered, or to provide full evidence that these locations and communities are not significantly affected by their proposal. This Council expects that improvements are required for the A12 in the Woodbridge area, for several other junctions along the A12, and for the B1078 and A1120 as well as Leiston and rural roads;
 - iv) The phasing of associated transport infrastructure: This Council requires a firm commitment for early delivery of the associated transport infrastructure to avoid disruption to the main haul route (A12-B1122) during the construction period;
 - v) The car park spaces: EDF Energy need to justify that the total number of proposed car park spaces, at the Park and Ride sites, on site and at the accommodation campus, are required;
 - vi) (Rail-led strategy) Additional road mitigation: EDF Energy needs to evidence whether the rail-led strategy requires additional road mitigation as proposed under the road-led strategy, including mitigation for Middleton Moor and the provision of a Freight Management Facility.
- c) That Suffolk County Council recognises that positive progress has been made in several topic areas, and supports the following proposals put forward in the consultation:
- i) The aspirations set for the socio-economic topics, although this Council asks EDF Energy to be even more ambitious in increasing the percentage of locally based workers (see also recommendation b) i) above);
 - ii) The proposal to set up a Housing Fund and Tourism Fund to provide mitigation in these areas, the details of which are still to be developed;
 - iii) The improvements in the design of some of the non-nuclear buildings on the main development site (see also b) vi) above);
 - iv) The location of sports facilities in Leiston;
 - v) Notwithstanding paragraph a) i) regarding the Council's concerns over the transport strategy, the Council supports the principle of the

following aspects of a transport strategy:

- i) Two-villages bypass for Farnham and Stratford St Andrew: This Council welcomes this proposal as we had requested the two-village bypass as minimum mitigation at Stage 2, however the Council is still reviewing whether additional mitigation, particularly for a road-led strategy, for Marlesford and especially Little Glemham will be required;
 - ii) The proposed locations for Park and Ride facilities in Darsham and Wickham Market/Lower Hacheston;
 - iii) The principle of the proposed roundabout at the A12/B1122 junction in Yoxford;
 - iv) (Rail-led strategy) The proposed upgrade of the East Suffolk Line, including a new passing loop and upgrades of level crossings (subject to specific comments particularly related to some of the proposed level crossing closures);
 - v) (Rail-led strategy): The principle of mitigation for the B1122, and creating a bypass for Theberton (further consideration will need to be given whether additional mitigation is required for Middleton Moor);
 - vi) (Road-led strategy) The principle of mitigation for the B1122, and the creation of an alternative route from the A12 to site in the road-led strategy (but see b) vi) ii) above);
 - vii) (Road-led strategy) The principle of a Freight Management Facility in the wider Ipswich area, although further information, including the assessment of alternative options, is required to advise on this Council's preferred location.
- d) That, for those impacts of the development that are residual and cannot be mitigated, EDF Energy be expected to provide wider compensation packages, including compensation for the lasting impact on and damage to the AONB and the wider landscape around the development which is important to protect and enhance the setting of the AONB and is highly valued by the local community and visitors. This Council will want to discuss the governance of such a fund with EDF Energy. It should be stressed that compensation should only be considered after having exhausted all options to avoid or mitigate impacts.
13. That the lead officer (the Assistant Director for Infrastructure and Waste at Suffolk County Council) in consultation with the Cabinet Member for Finance and Assets be authorised to make any amendments to the draft response as agreed with the appropriate representatives of this Council.
14. That, to effectively deliver infrastructure of this scale alongside other large infrastructure projects in Suffolk including the proposals by Scottish Power Renewables and National Grid Ventures in the Leiston area, the Sizewell C development requires EDF Energy, other developers, the local Councils – Suffolk County and Suffolk Coastal District -, the New Anglia Local Economic Partnership and Government to work closely together to minimise negative impacts and maximise opportunities locally. That, to achieve this officers and Members continue to engage with Government and partners, including through

the Suffolk Energy Coast Delivery Board chaired by Therese Coffey MP, to maximise the benefits from the development. It is recommended that:

- a) This Council lobbies for Government, or one of its agencies, to be charged with taking the lead on the coordination of the range of energy projects in the Sizewell area in a way that enables their overall impact to be assessed in advance before commitments are made to initial schemes;
 - b) EDF Energy be asked to work closely with other developers, including Scottish Power Renewables and National Grid Ventures, to consider how mitigation across the schemes can be combined to minimise the impact of the totality of developments on the local area;
 - c) This Council continues to promote proposals for a four-village-bypass as part of the Suffolk Energy Gateway, and aim to persuade Government to provide funding for this alongside local contributions from EDF Energy and Suffolk County Council;
 - d) This Council works with Government and relevant agencies on additional requirements for infrastructure to accommodate Sizewell C alongside other significant strategic developments in Suffolk;
 - e) This Council seeks to persuade Government to make the maximum level of community benefits available for Suffolk, including but not limited to maximising the amount of business rates arising from Sizewell C to be retained in Suffolk;
 - f) This Council continues to work closely with the Suffolk Energy Coast Delivery Board, MPs and other partner organisations to maximise the opportunities for skills, employment and the supply chain in Suffolk.
15. That this Council continues to engage closely with all key partners to develop an evidence base on the impacts of all aspects of the proposal and develop the mitigation/compensation options, including:
- a) Significant local engagement, by working closely with Town and Parish Councils, and other groups/bodies, as appropriate, to develop a local evidence base;
 - b) Further work on the environmental impact of the development with the key environmental government bodies, including the Environment Agency and Natural England, and with non-governmental organisations such as the National Trust, the RSPB and the Suffolk Wildlife Trust;
 - c) Further collaboration with the relevant organisations, including Chamber of Commerce and the New Anglia Local Economic Partnership, in partnership with EDF Energy, on maximising skills, employment and supply chain opportunities in Suffolk and the region, as well as engagement with Essex local authorities in relation to additional economic and employment opportunities from the possible presence of two new nuclear power stations (Bradwell B as well as Sizewell C) in the region.
16. In addition, it is recommended that Cabinet authorises the Chief Fire Officer in consultation with the Cabinet Member for Environment and Public Protection to make a submission for the Suffolk Fire and Rescue Service which is consistent with and expands upon the response to EDF Energy set out in the Appendix.

Reason for recommendation

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

What are the key issues to consider?

18. The Cabinets need to consider whether the proposed draft response to EDF Energy is appropriate in robustness and ambition, without putting undeliverable demands on EDF Energy.
19. Cabinet may also wish to consider whether the wider engagement proposals for the Councils, with Government and local, regional and national partner organisations, will be effective in maximising the positive outcomes of the proposed development for Suffolk.

What are the resource and risk implications?

20. Each of the Councils have agreed a Planning Performance Agreement (PPA) level of contribution from EDF Energy for 2019, to cover officer and external adviser time to respond to the Sizewell C proposals. It should be noted that the PPA will not cover work that is not directly relevant/attribution to the preparation of the DCO submission for EDF Energy. Therefore, additional funding from the Councils' own resources may be required to develop a comprehensive engagement process over the next few years, including during examination. The amount of such funding cannot be yet be quantified, but there is currently no provision for this in financial planning.
21. A Sizewell C Nuclear Power Station would bring significant financial opportunities to Suffolk. According to EDF Energy's figures, the development is expected to generate at least £100m pa investment in the regional economy during construction and £40m pa during its 60 years of operation. It would strengthen the Suffolk economy and employment market, and a package of mitigation and compensation would have a lasting legacy.
22. 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. In general, current proposals for business rate retention is for 75% to be retained but this may be increased in later years. It should be noted that business rate retention proposals relate to growth in business rates across Suffolk, which means that not all of the business rates from Sizewell C would automatically be retained in Suffolk. It is recommended that Cabinet agrees to further lobbying of Government to seek the maximum amount of business rate retention, as further compensation for the local community.
23. The County Council Cabinet should note the possible additional financial burden on the County Council for contributions towards the Suffolk Energy Gateway (SEGWay) if the authority is required to provide match funding or fill a gap between the justifiable sum required to mitigate the Sizewell C impacts and the cost of the full scheme. The Outline Business Case the County Council submitted to the Department for Transport indicated that this Council would

underwrite 5% funding (£6.6m in case of a dual carriageway design), but this would require further Cabinet approval and be considered alongside other priorities. A contribution equivalent to the cost of the essential mitigation for Sizewell C for the four villages would be sought from EDF Energy.

24. For any road scheme completed by EDF Energy as part of their mitigation package, the County Council needs to consider whether to adopt the road after Sizewell C's construction period, with additional ongoing costs to the Council although this could, if appropriate be ameliorated through appropriate commuted sum payments by EDF Energy.
25. 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 and tourism and other industries.
26. 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. However, some benefits have already been accrued such as EDF Energy's investment in the habitat creation area at Aldhurst Farm, Leiston.
27. An Equality Impact Assessment (EqIA) was not undertaken as we are responding to the planning proposals of EDF Energy. As such, EDF Energy is required to satisfy the EqIA requirements. The Councils will reconsider at later stages in the process whether an EqIA will be required from the Councils.

What are the timescales associated with this decision?

28. Following the decisions of Suffolk County Council's and Suffolk Coastal District Council's Cabinet meetings, taking place consecutively on 11 and 12 March 2019, an agreed joint response for EDF Energy's Stage 3 consultation needs to be submitted by 29 March 2019.
29. 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, and the Stage 2 consultation in 2016/17. The Councils submitted a joint response to each of these consultation stages. EDF Energy has now launched its Stage 3 consultation, including further details of the proposal. Stage 3 is the final planned public consultation phase for Sizewell C 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. It is expected that EDF Energy will submit this application in early 2020. The Councils expects to continue to engage with EDF Energy throughout the period up to the examination, on its proposals and mitigation and compensation proposals.
30. If development consent is given, it is anticipated it will take 10 to 12 years to build and complete the station. Following construction, Sizewell C should be operational for a minimum of 60 years.
31. It should be noted that Suffolk Coastal DC and Waveney DC will cease to exist in March 2019, with the creation of a new East Suffolk Council. Thus, between

the time of the third stage of consultation and subsequent DCO submission East Suffolk Council will be the relevant District Council.

Alternative options

32. 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.

Who will be affected by this decision?

33. The development of a Sizewell C Nuclear Power Station would have an impact on residents throughout Suffolk and beyond, in terms of the economic and employment benefits. The tourism industry along the East Suffolk coast will be particularly affected by the development.
34. Residents in the vicinity of the development site, particularly those in Eastbridge, Theberton and Leiston will be most affected by the negative impacts of the development. Transport impacts will particularly affect residents and road users of the A12 between Seven Hills junction and Lowestoft, and the B1122. However, transport impacts will affect wider areas, including along the B1078, the A1120, the A145 and a number of rural roads, as well as the wider strategic road network. Additionally, there will be an impact on local residents near the proposed Park & Ride sites, which are proposed at Wickham Market and Darsham. In the rail-led option, proposals also include closures and upgrades of rail level crossings on the East Suffolk Line between Westerfield and Saxmundham. Either rail or road-led option may have potential impacts on users of the East Suffolk Line, and the additional capacity pressure on rail could potentially have an impact on the rail operations of the Port of Felixstowe.

Main body of report

Introduction

35. EDF Energy is proposing to build a nuclear power station at Sizewell. This would be a very significant development for Suffolk. The investment into and size of Sizewell C would be similar to the London 2012 Olympics, with £14bn plus investment and an area similar in size to the Olympic Park in East London. The construction site would take up 300ha of land, largely within the AONB which also contains many European and national ecological designations. It would create 5,600 peak construction jobs plus 500 jobs supporting Associated Development sites, and in Stage 3, EDF Energy are also considering a higher assessment case considering the effects of a possible peak workforce of 7,900 workers plus 600 workers on Associated Development sites. Once in operation, the power station would generate 900 permanent jobs. 60-70% of jobs are suggested to be non-nuclear specific). EDF Energy expect the development to generate a £100m pa investment boost to the regional economy during construction and £40m pa during operation.
36. 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.

37. However, the Councils have a key role to play in putting forward the views of the local community. 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 a key role for the Councils in providing a Local Impact Report for the Examination of the application by the Planning Inspectorate. In these contexts, the roles of the two Councils are equal. The Councils, in particular the new East Suffolk Council, will, as local planning authorities, be responsible for discharging the Requirements (planning conditions) on the DCO and be responsible for the monitoring and enforcement of any DCO made.
38. EDF Energy is consulting on its Stage 3 proposals to build a nuclear power station at Sizewell, together with the required Associated Development at various locations in East Suffolk. This is the third, and expected to be final, stage of a three-stage process of consultation. After the third consultation stage, it will be for EDF Energy to decide whether to submit its application for a DCO to the Secretary of State for consideration via the National Infrastructure Planning section of the Planning Inspectorate (<https://infrastructure.planninginspectorate.gov.uk/>). At that point, there will be the opportunity for the local authorities and others to raise any unresolved issues through representations to the Planning Inspectorate. EDF Energy has indicated that they hope to submit their application in early 2020.
39. The Stage 3 Consultation started on 4 January 2019, with a closing date of 29 March 2019. At Stage 2, the two Councils requested at least a 12 weeks consultation period, without public holidays, and we are pleased that EDF Energy has given this in Stage 3.
40. The Stage 3 consultation follows EDF Energy's Stage 2 consultation in 2016-17, to which the two Councils jointly responded in February 2017. The Stage 3 consultation includes some 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 2 are:

For transport proposals:

- a) Discarding a sea-based strategy to move materials and the introduction of a road-led approach alongside a rail-led approach
- b) Rail improvements including a passing loop between Melton and Wickham Market stations (Campsea Ash), level crossing upgrades and closures;
- c) A new link road from the A12 to the site alongside the B1122 (for the road-led approach), or a Theberton Bypass only (for the rail-led approach);
- d) Confirmation of a two-villages bypass mitigation for the A12 at Stratford St Andrew and Farnham for both road and rail led options;
- e) Confirmation of the Park and Ride sites at Wickham Market (Lower Hacheston) and Darsham, with an increase of car park spaces;
- f) New proposals to mitigate traffic impacts along the B1078 in Wickham Market;

- g) For the road-led approach, a Freight Management Facility along the A14;
- h) The introduction of some other junction improvements.

Other proposals:

- i) Sensitivity testing for up to 7900 + 600 workers on site at peak;
 - j) Proposals for a housing fund and a tourism fund;
 - k) The introduction of four tall pylons and overhead cabling on the power station site;
 - l) Refinements to the design of non-nuclear buildings at the power station;
 - m) Confirmation of a causeway with culvert crossing the SSSI;
 - n) Additional development on Goose Hill to the north of the power station;
 - o) Confirmation of a Beach Landing Facility and abandonment of the jetty proposals in Stage 3;
 - p) Details on sea defences and remodelling of the Northern Mound;
 - q) Proposals to relocate Sizewell B training centre, visitor centre and outage car park (to free up space for Sizewell C);
 - r) Details on proposals for the land east of Eastlands Industrial Estate;
 - s) Refined and confirmed proposals for the Accommodation Campus.
41. 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](#).
42. This Scoping Opinion sets out the required contents of the Environmental Statement necessary to accompany the 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.
43. EDF Energy is proposing to submit a further Scoping Opinion to the Planning Inspectorate after the Stage 3 consultation period. This is to update the previous Scoping Opinion, this means the development will be considered having regard to the EIA Regulations 2017. The Councils will be asked their opinion by the Planning Inspectorate at that time and we intend to take part in that process.
44. If consent is given, it is anticipated it will take 10 to 12 years to build and complete the station. Following construction, Sizewell C should 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.

45. EDF Energy is seeking the views of the Councils alongside those of other bodies and the public. As with the Stage 1 and Stage 2 responses, the Councils aim again to issue a joint response to EDF Energy in relation to their Stage 3 consultation.
46. The appendix contains the draft joint response from the Councils to EDF Energy's Stage 3 proposals for the new power station and Associated Development sites.
47. 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 considered. 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.
48. The Councils are disappointed that the consultation documentation for Stage 3 remains insufficiently comprehensive and not sufficiently evidenced in several important areas for the Councils to be able fully to consider the impacts. Therefore, we remain unable fully to evaluate 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.
49. 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, despite this very likely being the final public consultation stage.
50. The Councils expect to work with EDF Energy towards a position where the Cabinets can conclude that on balance the advantages of EDF Energy's proposals outweigh the disadvantages. We will work with EDF Energy to help them develop their proposals, including seeking mutually to resolve the necessary mitigation and compensation, in advance of their submission of an application to the Planning Inspectorate. It is in both parties' interest that the Sizewell C proposal becomes a proposal which can work in and for Suffolk. It is acknowledged that EDF Energy propose to continue working with the Councils in advance of submitting their DCO.
51. This report sets out the rationale behind the draft responses.

Policy context

National policies

52. 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.”

53. 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 in 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 law is clear that the National Policy Statement prevails.
54. 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;
 - 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.
55. As part of the production of the National Policy Statements, the Department of Energy and Climate Change (now Department for Business, Energy 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.

56. 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.

Local Policies

57. 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 and Local Transport Plan (LTP) 2.
58. 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.
59. Policy SP24 on Leiston recognises the potential impact of Sizewell on the town and seeks to achieve social and community benefits from future investment.
60. The Suffolk Coastal Local Plan Review is at its final round of public consultation on the soundness of the document, it includes policy SCLP3.4 Proposals for Major Energy Infrastructure Projects. This policy identifies the need to mitigate the impacts arising from such developments. The Plan has not yet been examined but is in its final stages of public consultation on its soundness, so limited weight can be given to it at this time. It is expected to be adopted planning policy by the time the DCO is submitted to the Planning Inspectorate by EDF Energy.
61. The County's LTP supports 'Transforming Suffolk: Suffolk's Sustainable Community Strategy'. The LTP recognises the 'Energy Coast', including Sizewell C as a key area for growth and development. Other pertinent sectors are Tourism and the Port of Felixstowe and the development of the University Campus Ipswich. A four-villages bypass for Farnham, Stratford St Andrew, Little Glemham and Marlesford (now referred to as SEGWay, is included as a strategic scheme in Part 2 of the County's LTP as a medium to long term project delivered by developers. Also included are proposals for improvements in Coddensham to relieve the impacts of HGV's on the village and major improvements to the A14/A12 Copdock Interchange.
62. The County Council's Minerals Local Plan Core Strategy includes policies which are relevant to the use of borrow pits.

63. 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 and specifically refers to the huge opportunity for growing East Suffolk's economy through the Sizewell C new nuclear development opportunity. It states that the east Suffolk Councils will continue to work closely with EDF Energy and a wide range of partners to maximise the economic benefits of the development, whilst minimising and managing any negative impact.

Consultation

64. This 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 comprehensive approach to engaging with key stakeholders and community representatives ahead of finalising the Councils' stance.
65. Post Stage 2 consultation, there has been some engagement by the Councils with EDF Energy through a series of planned workshops under a PPA which is in place to provide support for the Councils to comment on and inform on emerging proposals. However, engagement with EDF Energy since Stage 2 had been very limited until the second half of 2018.
66. Members of the two Councils have met with local specific interest groups and representatives of anti-nuclear groups to understand and discuss their issues.
67. The Councils held a community engagement event in January 2019, 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.
68. To support Town and Parish Councils to prepare their responses to the Stage Consultation, the Councils agreed with EDF Energy that they again, as in Stage 2, fund Planning Aid England, an organisation that offers independent and professional town planning advice and support to communities, to provide assistance.
69. The Councils are committed to continuing their engagement with Town and Parish Councils following on from the Stage 3 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.

Strategic objectives

70. The Lead Members and local Members of the two Councils agreed the following key strategic objectives which they will seek to deliver in partnership with EDF Energy, Government and other organisations, in relation to their requirements to safeguard the interest of all Suffolk residents especially those in the east of the county during the development and operation of Sizewell C if the development takes 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.
71. 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 Suffolk Chamber of Commerce and New Anglia Local Economic Partnership (NALEP, while for example the Suffolk Energy Gateway (SEGWay) (under objective (f)) will require funding and support from Government. Objective (h) is supported by our work with the Nuclear Legacy Advisory Forum (NuLeAF).
72. It should also be acknowledged that in terms of jobs, skills and business growth issues in particular, there is the likelihood of other significant new nuclear build, and major national infrastructure projects under construction in the country and internationally. 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

73. The following section sets out the rationale for responses set out in the Appendix.
74. As proposed in the recommendation of this report (see paragraph 10), 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 3 Consultation, the Councils are not yet able to fully support the specific proposals by EDF Energy, as we are not content with all aspects of the development and the impacts of the proposed development are not yet fully developed or evidenced.
75. The Councils are disappointed that the Stage 3 proposals have not evolved more since Stage 2, particularly given that this is the final round of public consultation. While some proposals have evolved; in many areas only limited additional evidence is provided in Stage 3 compared to Stage 2. The Councils are disappointed with the limited levels of engagement with

EDF Energy between Stage 2 and autumn 2018. Both of these factors mean a very considerable amount of issues will have to be dealt with between Stage 3 and submission.

76. Thus, the Councils' overall response to Stage 3 is similar to that made at Stage 2. To be able to support the development in full, the Councils need to see more detail and information in order to be able to consider, review and advise on the appropriate mitigation or compensation for the significant negative impacts of the development. The Stage 3 consultation documentation does not provide sufficiently detailed information or sufficiently robust and evidenced mitigation proposals. Further work will be required before submission of the DCO Application to satisfy the Councils' requirements. We will seek the opportunity to engage further with EDF Energy to help them develop their proposals, including seeking mutually to resolve the necessary mitigation and compensation.
77. 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. These general principles are amplified below in detail as to 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.
78. Beyond mitigation and direct compensation, we will seek from EDF Energy a good level of benefit to the local community, to compensate for the many intangible and residual impacts a project of this scale causes, in a similar way to that established practise in Somerset.
79. The District Council has a Community Infrastructure Levy (CIL) 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 DCO. 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.
80. 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 and the potential interconnectors with Belgium and the Netherlands proposed by National Grid (see paragraphs 166-173 below). National Grid would submit its own DCO for such 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; there has been an indication that these may need to be re-strung which will have no significant impact.

Economic impacts, skills, community impact

81. At Stage 3, EDF Energy continue to estimate that the peak workforce will be 5,600 workers on the main development site plus a further 500 workers working on the Associated Development sites. While the Councils welcome the very significant benefits this would bring to local employment markets, supply chain and skills development, the impact of this number of workers on housing market, transport network and community facilities would be considerable.
82. EDF Energy has also introduced sensitivity testing of the peak workforce numbers, considering what the effects might be if the peak workforce increased to 7,900 workers on the main development site plus 600 on Associated Development sites. The Councils welcome that EDF Energy is considering the impacts of a “worst-case scenario” of increased workforce numbers. However, we need to be convinced that appropriate mitigation can be put in place for such a potential increase. The Stage 3 proposals need elaboration, as it is not clear how the local housing market could accommodate such an increase with the limited additional mitigation proposed, this needs to be expanded and discussed further. Neither is it clear how such a potential increase was incorporated in EDF Energy’s Gravity Model and Traffic Modelling.
83. We continue to welcome EDF Energy’s aims, objectives and intentions 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.
84. In the socio-economic areas, the Stage 3 consultation indicates generally appropriate aspirations, but there is still not enough detail on delivery mechanisms to determine whether the aspirations are achievable or ambitious enough to capitalise on the opportunity to deliver a lasting positive legacy for our residents.
85. We are committed to continue working with EDF Energy over the coming months, to provide further input to their evolving proposals.
86. To meet the Councils’ 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 residents taking up roles, particularly for the highly skilled jobs. We request further work on the expected adverse economic impacts on other sectors, such as tourism.
87. In order to deliver on the socio-economic opportunities we expect EDF Energy to invest in skills, employment and business interventions that, among other outcomes, raise aspiration and achievement levels for young people (especially in STEMC – Science, Technology, Engineering, Mathematics and Construction - subject areas), provide opportunities for those not in employment, enhance the local skills training offer and

increase skills levels that provide a legacy workforce aligned to forecast future need and provide facilities for business expansion and inward investment. We expect to see commitment to offer opportunities for local companies to benefit from the development and the ongoing operation of the site. We expect to be fully engaged, alongside Suffolk Chamber of Commerce, in the development of the supply chain engagement strategy.

88. 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.
89. 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 the two power stations will overlap, thus it may be helpful 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.
90. The Councils highlight in their draft response to EDF Energy the need to mitigate and compensate for the community impacts of the development. We welcome that EDF Energy's Stage 3 proposals include an indication that they would look to set up a Housing Fund, Tourism Fund and Community Fund to mitigate and compensate for some of the impacts of the development. We equally welcome that EDF Energy recognises the wide range of impacts their development may have on services for the local community, including on the health system, social care and education.
91. 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, General Practitioner (GP) surgeries, dentists, hospitals), blue light / emergency services, social care and local community facilities.
92. As part of EDF Energy's accommodation strategy we expect more detail to ensure robust measures are set up to mitigate any impacts on the wider housing market and local services and facilities associated with the demands of EDF Energy workers, including for the potential of an increased workforce of 7,900 + 600. We will look to explore opportunities for the Council to work with EDF Energy around these impacts.
93. The Sizewell C development will have a significant impact on the Leiston Recycling Centre (Lovers Lane IP16 4UJ) by increasing congestion, leading to the risk of queuing and associated risks to road users. The County Council requires early discussions about how the impact can be mitigated so that Leiston and the surrounding area can continue to receive

a good and safely delivered recycling service. The Recycling Centre is an important and well-used community facility.

94. The Government has committed to deliver a community benefit package to communities that 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.
95. 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 time, but a Government official has confirmed that it remains Government policy.
96. Recently the Ministry of Housing, Communities and Local Government has informed the New Nuclear Local Authorities Group, with Cllr Holdcroft as the current Chairman, that a consultation related to Business Rates retention would consider this issue. To date this has not happened, and officers are continuing to press for action. It should be noted that there is precedent for this type of fund from the offshore wind developments and in the emerging fracking areas, albeit these could be different mechanisms than that required in this case. This matter will be taken forward by the Councils.

Main development site - environmental impacts

97. The nominated site lies on the Suffolk Heritage Coast, wholly within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) national designation, and the lay-down 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 environment impacts compensated for through a Section 106 agreement. The fund established to compensate for the impact of the Dry Fuel Store on the Sizewell B site is a welcome precedent and model which the Councils would like to explore further with EDF Energy, but it has its challenges, so it is not suggested that it is exactly replicated.
98. The scale of the construction operation must not be underestimated; public enjoyment of this unique environmental resource will be hugely reduced for a significant period and, potentially, irreparably damaged. Once visitor patterns are disrupted and Suffolk's brand and reputation are damaged, this 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 the 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 cannot be mitigated compensatory arrangements will be needed. Furthermore, the legacy of this development should be to create an environmental and amenity resource to complement the existing features of national renown in the area.

99. At Stage 2, the Councils raised concern that the consultation failed to recognise or truly acknowledge the environmental challenge that development at this site faces, nor the likelihood of residual impacts in several areas. The Councils noted at Stage 2 there needs to be further significant ecological work to seek to survey, understand, quantify and qualify these impacts. Unfortunately, we do not feel that these concerns have been sufficiently addressed in Stage 3 - it appears that there has been no significant ecological fieldwork undertaken since Stage 2. This is of significant concern, not least as some of the survey data may be out of date.
100. Stage 3 introduces several changes to the main development site. Many of these are detrimental rather than beneficial in comparison to the Stage 2 proposals. Changes include the introduction of tall pylons on the main development site, some improvements to the design of non-nuclear buildings on site, further permanent development within the AONB at Goose Hill to the north of the site and Pill Box Field to the south of Sizewell B, and further details regarding the SSSI crossing, beach landing facility and sea defences.
101. Stage 3 does not include any detail about hydrology, treatment of surface water, impacts on ground water or on potable water supplies. The Councils are concerned that elements of the development may have significant potential impact on ground water levels. Equally, there are doubts over whether the proposed designs allow for incorporating Sustainable Urban Drainage Solutions (SUDS). Questions on the availability of potable water supplies have been raised in previous consultation responses but remain unanswered; however, we understand that the local water company, Essex and Suffolk Water, does not believe there to be an issue.

Power Station Design / pylons

102. The introduction at Stage 3 of four further pylons (each to be taller than standard pylon height, at a similar height of the proposed nuclear domes) and power connection lines on the power station site raises concerns for the Councils. Additional pylons in the AONB would have very significant additional adverse impacts on the identified special qualities of the AONB. The visualisations, particular those from further afield, such as at Dunwich Coastguard Cottages, demonstrate the additional visual clutter that pylons contribute to the skyline. The Councils have significant objections to this element of the scheme and urge EDF Energy to pursue alternative options. If EDF Energy can demonstrate they are technically essential, they should develop and evaluate proposals to increase the space for the main development site in order to facilitate undergrounding of the cables. It is not considered that there is any option for visual mitigation of additional pylons

and that the technical difficulties for undergrounding do not appear to be insurmountable. If there is a technical solution to underground the cabling but this would result in an extension of the construction schedule, the Councils would not consider this as insurmountable and would be likely to be preferable to additional pylons in the protected landscape which would endure for at least 60 years.

103. As part of their Stage 3 consultation, EDF Energy has changed some of the design elements of the non-nuclear buildings on the main site. This includes updated design proposals for the turbine halls to make them more sympathetic to their location in the AONB, and a reduced height of the operational service centre, making it less visible in the landscape. These proposals are a considerable improvement on previous iterations. However, it should be noted that these changes do not outweigh the significant additional harm the power connection and additional developments of training facilities and outage car park cause in this AONB setting.
104. As in Stage 2, we remain concerned about the design of the main reactor buildings, given the location of Sizewell C in a landscape of national and international importance and sensitivity. We will still require more detail on the quality of the exterior finish on the nuclear buildings (which are a fixed part of the generic design). Further detail is also required regarding the height and finish of the stacks adjacent to the reactor domes. Where it is not possible to improve the design quality, we expect a compensation package due to the lasting residual impact on and damage to the AONB. Given the importance of the potential impact of the design of the structures on the purpose of the AONB and the importance given within the National Policy Statement assessment of the Sizewell site to this factor, the revised design should be subject to further consideration by the Design Council (formerly known as CABE) who examined it at an earlier stage of development.

Additional developments at Goose Hill and Pill Box Field

105. The Stage 3 consultation proposes increased permanent development at Goose Hill, a site within the AONB to the north of the proposed new power station. In addition to permanent parking spaces already proposed at Stage 2, proposals now also include a training centre with car parking for Sizewell C as well as an outage car park. As part of the Sizewell B relocated facilities, Sizewell B proposes to relocate their outage car park to a different location within the AONB, at Pill Box Field.
106. As a principle, the Councils should not support any additional development within the AONB unless the location is absolutely essential. The Councils are equally concerned about the considerable potential impacts of permanent developments on Goose Hill upon biodiversity, including European Protected Species (such as bats and otters), and any development in this location would need to address these.
107. We are not satisfied with the explanation as to why the training facility building must be (a) separate from Sizewell B's requirements, and (b) in immediate proximity to the new nuclear power station. To avoid a site that adversely impacts the AONB, we would strongly encourage EDF Energy to

locate the training building for the C station offsite within Leiston. If it is demonstrated that this is not possible, the building should be co-located with the training facility arrangements for the Sizewell B station in the relocated facilities programme. Neither of these options would bring the permanent built form across the SSSI crossing into the open landscape from the main nuclear island.

108. There are additional concerns with the outage car parking at Goose Hill. The principle of locating a car park in the AONB would need to be justified to show why it could not be provided on a site outside the AONB. There appears to be no reason why two outage car parks would be required when it seems unlikely that planned outages will be undertaken simultaneously. The Pill Box Field car park would be accessible from both stations. In the highly unlikely event of unplanned outages taking place simultaneously, alternative temporary car parking could be found in the locality. The Councils would be supportive in helping this on the rare occasion it may be required. Furthermore, the scale of the operational car parking at Goose Hill would need to be fully justified.

SSSI Crossing and SSSI loss

109. At Stage 2, EDF Energy was consulting on four alternatives for crossing the SSSI immediately to the north of the proposed power station. The Councils preferred at Stage 2 the three-span bridge. At Stage 3, EDF Energy is promoting a causeway with culvert as the preferred option for the SSSI crossing. We have not seen new evidence in addition to that seen at and before Stage 2 to reassess this proposal.
110. A key consideration of the SSSI crossing proposals must be the impact of the proposed crossing on groundwater levels, which we understand will be modelled early in 2019. We also require a comprehensive assessment of the impacts of the proposal on all aspects of ecology, which will inform how to mitigate for species across the development.
111. Any crossing proposal should aim to minimise the loss of SSSI and ecological impact. Of any of proposals put forward in Stage 2, the now proposed causeway/culvert option results in the highest SSSI loss and has the highest potential adverse impact on ecological connectivity. For these reasons, the Councils, along with several other natural environment stakeholders, preferred a bridge option at Stage 2. EDF Energy has not provided any justification for deciding upon the causeway/culvert as their preferred option.
112. We understand that one of the advantages of a causeway is its potential to be adapted to act as a sea defence, to cater for potential sea level rises. We expect further assessments on this aspect of the proposal to be undertaken as part of the DCO, so that the Councils and other statutory consultees can come to an informed view of the potential impacts and benefits of this proposal.
113. Further discussions are required to agree appropriate mitigation, compensation and enhancement measures for the SSSI land lost and disturbed, including both on-site and off-site measures.

Spoil Management

114. The Stage 3 information on spoil management has not significantly changed or increased since Stage 2. The main changes are that one of the borrow pit options, east of Eastbridge Road, has been discounted. In addition, stock piles are also proposed for the Land East of Eastlands Industrial Estate (LEEIE). Otherwise, the proposals remain, to use three fields to the East of Eastbridge Road as borrow pits, and to have stockpiles of up to 30m height.
115. The Councils retain their concerns about the proposal of borrow pits in a location within or adjacent to the AONB, with possible as yet not identified, 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.
116. We would like to stress that more detailed assessments are required for us to provide an informed response to EDF Energy's proposals. To develop a full understanding of the spoil management proposals and their transport implications, we request an overview of the likely and worst-case scenario for the balance of materials, i.e. how much material would be used from borrow pits, how much additional material would need to be brought onto site, and how much surplus material would need to be taken off-site. We have some concern about the potential impact of stockpiles on adjacent uses – particularly the impacts of the main stockpiling area on the proposed accommodation campus and the stockpiling to the LEEIE on adjacent residential areas. Clarification is required in several other areas, including operating hours, depths of borrow pits, noise, vibration, air quality, lighting, stabilisation of stockpiles and groundwater movements.

Beach Landing Facility

117. As stated in our Stage 2 response, the Councils principally support sustainable transport modes to the site, i.e. sea-based and then rail-based transport. EDF Energy need still to evidence why a jetty as part of a marine-based transport strategy is not possible (see paragraph 141). Regardless of the outcome of the review of the jetty option, as such we welcome that an element of sea transport for Abnormal Indivisible Loads to a Beach Landing Facility is still part of the proposals.
118. While we welcome the principle of the Beach Landing Facility, several concerns need to be addressed. These include potential impacts of coastal change on the Beach Landing Facility structure and the adjacent rock defences and we wish to see further detailed assessments of how their future exposure will affect coastal processes. There is also no detail on any requirements for dredging to create and maintain access for barges and tugs, and the impacts this would have on coastal processes and ecology.
119. We are concerned about the disruption of Beach Landing Facility operations to recreation on the beach, particularly for the England Coast Path, if the coastal path has to be regularly closed. The England Coast Path is of national significance, as established in the Country Side Rights of Way Act 2000 and plays an important part in Suffolk's tourism economy.

Appropriate mitigation, including avoidance of closure whenever possible and a safe, attractive diversion route if absolutely necessary, needs to be considered further.

Sizewell B Relocated Facilities

120. The Sizewell B Relocated Facilities have been included as part of the DCO proposals, although an application under the Town and Country Planning Act is expected to be submitted in 2019 for determination by the new East Suffolk Council.
121. The relocated facilities include an outage car park, a training centre, a visitor's centre for the B and C stations and additional car parking and laydown area for use during outages. The full detail of the visitor centre and the training centre has not yet been designed. The relocated facilities would primarily be in Pillbox Field (outage car park) and on the site of Coronation Wood, which would be felled. The access to the parking area is along a bridleway. Mitigation to allow safe access for rights of way users will be required. These proposals have been discussed with the Councils during a pre-planning application process and, subject to final design detailing, are generally considered to be acceptable.
122. There is likely to be some local concern over the felling of Coronation Wood, however the District Council's Arboricultural Manager is content that the Wood has been poorly maintained over its lifetime and its trees are coming towards the end of their useful lifespan. However, further information and assessment is required to determine what the ecological interest is, and particularly any presence of bats. If felling is accepted, this would need to take place during the appropriate season. The relocated facilities work will be undertaken by the generating arm of EDF Energy; it is hoped that they can be carried out under a planning permission under the Town and Country Planning Act, but in order to ensure these critical elements to facilitate the construction of Sizewell C are carried out, EDF Energy are also including them in the DCO for the project. If necessary, they will be carried out by the new nuclear development team at EDF Energy. There remains some concern around the additional built development in the AONB which needs justification. The Councils would also like to see EDF Energy consolidating some facilities to be shared between the B and C station to minimise land take in the AONB (see also paragraph 107). However, we are mindful of strict ONR requirements for the licensed B station that need to be taken into account.

Coastal Processes and sea defence proposals

123. We remain concerned about the impact of the proposed development on coastal processes and the marine environment. In particular, we remain 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. This is a concern we raised at Stage 2, and still 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 likely to 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 are acceptable. We urge EDF Energy to consider further whether the layout of the site could be condensed to reduce the land

take, and thus avoiding the footprint of Sizewell C being either further seaward or taking up further SSSI land. It may be possible that the sea defences could be put nearer the station and this may be a solution but further work on this issue is needed.

124. 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 on EDF Energy to provide mitigation if actual change departs from anticipated baseline change. This will need to be backed by a strong legal document.
125. 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.

Other changes to the main development site

126. Other Stage 3 changes on the main development site include rebuilding the Northern Mound (to the north of the proposed power station site), and proposals for an emergency response equipment store, backup generator and an electrical substation in the area of Old Abbey Farm. These are commented on within the detailed draft response to EDF Energy.

Accommodation strategy

127. The potential impact of an additional workforce on the local housing market is a key area of concern, the information provided by EDF Energy demonstrates that there would be a significant uplift in workers seeking accommodation in the tourism sector and in the private rented sector, the locality does not have this level of availability. There is a real concern that this could be detrimental to the more vulnerable members of society currently in the private rented sector. An increased Housing Fund may not be enough to address the additional demand. EDF Energy is expected to work closely with the District Council to ensure that the housing market is as robust as possible for an increased number of workers to be considered sustainable.

Accommodation Campus

128. At Stage 3, EDF Energy has refined their proposals for an accommodation campus, at their preferred location at the entrance of the main development site, near the junction of the B1122 and Eastbridge Road. As in Stage 2, the proposed campus would accommodate up to 2400 bed spaces, along with ancillary facilities. At Stage 3, EDF Energy has clarified that the campus should be solely to the east of Eastbridge Road, with a maximum height of four storeys (reduced from the five storeys proposed at Stage 2). The sports facilities are now proposed to be in Leiston.
129. EDF Energy's preference is for a campus at the entrance site. This has operational advantages for EDF Energy. The Councils understand the rationale of an accommodation campus located at or close to the construction site, however this does not come without disadvantages given its sensitive location.

130. The proposed development is on a very compact site. While the compact nature of the development is in one way welcome as it reduces land-take, it does not give any scope for potential expansion should the workforce number increase from 5,400 to the higher number of 7,900 as tested within Stage 3. Whilst additional capacity could be achieved by increasing the height of the accommodation campus if considered essential, this would need to be fully and carefully assessed having regard to the potential impact on the setting of Leiston Abbey and the wider landscape. The Councils will expect to discuss and progress with EDF Energy alternative ways to boost local housing supply to accommodate additional workers.
131. EDF Energy are requested to provide further evidence and a business case to demonstrate why they consider their favoured location to be the optimal location. The Councils would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. Suffolk County Council would also like EDF Energy to reconsider the nearby Leiston airfield site as an alternative location for the campus. The Councils expect that as part of the business case, EDF Energy will be expected to provide 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. Subject to receipt of such business case and justification of location, whatever accommodation campus site is chosen will need to prove that environmental impacts can be sufficiently mitigated and compensated.
132. We welcome that EDF Energy are proposing the sports facilities for campus residents at a site in Leiston, in order to provide benefit and legacy to the local community. We welcome the shared nature of these facilities.

Land East of Eastlands Industrial Estate

133. EDF Energy has confirmed in Stage 3 their proposals for the use of the LEEIE. Proposals include either a reconfiguration of the existing Sizewell Halt rail terminal, or a new rail siding within the LEEIE, stockpiles of up to 15 metres high adjacent to the rail line, a 400-pitch caravan site, an early years Park and Ride site and a logistics compound.
134. The Councils have significant concerns about the compacted nature of these proposals, the number of different uses proposed and the relationship between these. No allowance has been made for space for Sustainable Urban Drainage (SuDS). There are concerns related to the impact of the stockpiles on adjacent properties (including on occupiers of the caravan site). There may be noise or other environmental issues from the activities proposed here, specifically night time storage of freight trains. The Councils are also concerned about the potential of a conveyor belt crossing over a public highway. Further work is required to clarify these matters.
135. The proposed caravan site on the LEEIE is in addition to the accommodation campus. The Councils support the principle of caravan accommodation, but the caravan pitch is not large enough to accommodate 400 pitches. The Councils

require further information on the assessment of alternative caravan sites, and the proposed site design.

Transport

136. At Stage 2, EDF Energy was proposing either a sea-based or rail-based approach to move materials on and off site. In the Councils' Stage 2 response, the Councils were supportive of a marine and/or rail maximised construction programme. The Stage 3 proposals do not include a sea-based strategy (although a beach landing facility for abnormally large deliveries remains). Instead, EDF Energy is now pursuing either a rail-led or a road-led approach.
137. A road-led approach would lead to a significant increase of the number of HGV movements (to site and return) at the peak construction period from 450 (rail-led) to 900 (road-led) on an average day, and from 900 to 1500 HGV movements on the busiest day. In a road-led strategy, there would still be 2 freight trains per day each way, into Sizewell Halt or upgraded rail sidings on the LEEIE in Leiston.
138. A rail-led approach would see five freight trains per day to and from site. It would include an upgrade to the East Suffolk Line as well as a new rail link into the development site.
139. Rail- and road-led approaches have two different sets of road mitigation proposals. Both rail- and road-led approaches include a two-village bypass at the A12 at Stratford St Andrew and Farnham and a new roundabout at the A12/B1122 junction in Yoxford. The rail-led strategy proposes a bypass at the B1122 for Theberton only, whereas the road-led strategy proposed a full link road from the main development site to the A12, meeting the A12 South of Yoxford. The Road-led strategy additionally proposes a freight management facility off the A14, either at Innocence Farm or Seven Hills. Both rail and road-led approaches feature also some further highway improvements, including mitigation for increased road traffic on the B1078 at Wickham Market.
140. At Stage 3, the transport modelling is based on a larger workforce than envisaged, which is used for sensitivity testing across the project. The Councils do not accept the suggestion in the EDF consultation that an increase of the workforce to up to 7900 does not create any additional traffic impact as suggested. It is unclear what assumptions were taken when increasing the modelled workforce numbers from 5,600 workers (plus 500 associated development operational workers) to a larger 7,900 workforce (plus 600 on Associated Development sites). The Stage 3 documentation is not clear how the additional workforce would be accommodated in the local housing market, and thus how it has been modelled in the gravity model. Until this has been clarified, we cannot verify whether additional mitigation may be required. To consider the acceptability of an increase of the workforce number beyond 5600, the Councils expect deliverable and enforceable mitigation proposals.

Transport strategy

141. The Councils are disappointed that EDF Energy has moved away from pursuing a strategy moving freight by sea, and request EDF Energy to

further reflect on the possibility of a marine-led strategy. We understand that EDF Energy's justification for not pursuing a marine-led strategy is the impact on marine ecology of building a jetty and a potential significant increase to the construction time. However, we have not seen any evidence for this, or any options appraisals that would weigh-up the impact of the marine-led strategy on marine mammals against the impact of additional roads in a road-led strategy on local ecology. An options appraisal for and against a marine-led strategy would need to also consider other factors, including the potential impact of jetties on the evolving coastline and coastal processes. Until we have such evidence, we retain our position at Stage 2 of favouring a marine and/or rail maximised construction programme.

142. The Councils have significant concerns about EDF Energy pursuing a road-led transport strategy. If a sea-based strategy proves to be undeliverable, the Councils urge EDF Energy to focus on a rail-led strategy as the preferred option, even though there are as yet unanswered questions regarding the availability of rail freight paths west of Ipswich and competition for these routes impacting on the existing economy of east Suffolk. Our concern remains to do all that can be done to reduce the traffic, particularly HGVs, on Suffolk's rural roads.
143. We are concerned about the potential, in a road-led scenario, to relax the restriction of hours of operation of HGV movements. Full impact assessments, including noise impacts of night-time traffic and resulting need for additional mitigation, alongside a business case that compares different levels of restrictions of hours of operation, will be required for the Councils to come to a view whether such a proposal is acceptable. In addition, air quality issues from increased traffic need to be assessed as part of all scenarios. Specifically, the impact on the A12 between Wickham Market and the two-village bypass requires further consideration in view of the increase HGV traffic in the road-led option.
144. The Stage 3 consultation still does not include full information as to how the quoted figures have been arrived at. Some of the figures in transport tables are illogical and appear to be incorrect, as referenced in the detailed response in the Appendix. The Stage 3 documentation refers to updates to the gravity model, however no further information of these updates has been made available to the Councils. Further clarification is required in these and other areas related to EDF Energy's traffic modelling, to enable an informed response on the proposals provided and other mitigations which may be required.

Rail improvements

145. The rail-led strategy proposals include several upgrade measures along the East Suffolk Line, including a new passing loop, upgrades to 33 level crossings and closures and diversions of public rights of way for a further 12 crossings. While the Councils need to consider the proposed level crossing closures in more detail, they are supportive of the principle of a rail led strategy compared to a road led strategy. The rail-led strategy also includes the construction of a new passing loop between Melton and Wickham Market (Campsea Ashe) stations. These improvements could become a valuable legacy for Suffolk. However, we require further

evidence that EDF Energy's proposals will be effective and in the right location, whilst maintaining at the very least the existing passenger service.

B1122 mitigation

146. The Councils welcome that EDF Energy is seeking to address our concerns around the traffic impacts for the B1122 raised in the Stage 2 consultation.
147. For the rail-led strategy proposals, a bypass around Theberton is proposed. We welcome this proposal in principle but need to review whether additional mitigation for the other villages along the B1122 – Middleton Moor and Yoxford – is required as the full link road as far as the south of Yoxford is not provided in this option.
148. The Stage 3 proposals for a road-led approach include a new link road from the A12 south of Yoxford to the site, bypassing Middleton Moor and Theberton. The documentation includes some information about the alternative routes assessed; however, so far, the Councils have not yet seen the detailed evidence as to how that route was selected. The case to justify the best possible route must revisit the routes considered by the promoter, with a comprehensive highways analysis and be mindful of any impact on allocations in the District Council's Local Plan and any other potential developments. Detailed evidence for each of the routes considered would be expected to include assessments on traffic modelling, ecology impacts, landscape and visual impacts, as well as air quality impacts, noise impacts and safety impacts. It should include a substantiation of the indicated split of 85% of HGV movements coming from the South and 15% coming from the North, and details of the Abnormal Indivisible Load (AIL) routes for the main site and associated works.
149. Due to its northerly location, the proposed route is unlikely to attract a significant number of cars and Light Goods Vehicles travelling from the south to the development site, LEEIE and the accommodation campus, as direct routes towards Leiston would be quicker. HGVs would have to travel the proposed link road, with the travel distance and journey time remaining similar to using the existing B1122 route.

Mitigation for Stratford St Andrew and Farnham at the A12

150. The Councils welcome the fact that EDF Energy is committed, for both rail-led and road-led strategies, to fund a two-village bypass at Stratford St Andrew and Farnham or make a proportionate contribution to the more desirable SEGWay scheme should it go ahead. The selection of the final route will need to be evidenced.
151. We explained at Stage 2 that, notwithstanding the above, the Councils were committed to the objective of the four-village bypass for Farnham, Stratford St Andrew, Little Glemham and Marlesford and were seeking Government funding to make this a reality. Based on Stage 2 information, we accepted that EDF Energy may not be the sole contributor to this scheme, as the four-village bypass could not be justified based on the impacts of the Sizewell C development alone. This position is being

reviewed by the Councils following the proposal for a road-led transport strategy with considerably more traffic at Stage 3.

152. The Councils are awaiting an announcement from Government in response to the County Council's bid for funding towards the SEGWay. This announcement has been postponed since September 2018.
153. However, for the road-led strategy at Stage 3 with more HGV movements and relaxed working hour restrictions, the Councils are also considering whether additional mitigation from EDF Energy may be required for Marlesford and Little Glemham.

Freight Management Facility

154. For the road-led version, EDF Energy has returned to proposing a Freight Management Facility. Stage 1 had featured a Freight Management Facility but was abandoned at Stage 2. At Stage 2 the Councils strongly encouraged EDF Energy to reconsider the establishment of a Freight Management Facility at a location along the A14. Therefore, the Councils welcome the re-introduction of this proposal, and wish this to be considered not only in a road-led but also in a rail-led approach.
155. EDF Energy proposes two options for the site of the Freight Management Facility: A site at Innocence Farm to the north of the A14 and west of the Trimley St Martin junction, or a site close to the A12/A14 Seven Hills Junction off the A1156.
156. Whilst the Councils welcome the principle of the Freight Management Facility, there are concerns for each option regarding the impacts on traffic flows at Seven Hills, and how to connect either site to the A14. The Stage 3 consultation material does not include sufficient traffic modelling information for the Councils to come to firm view which of the options is preferable. The Councils also request EDF Energy to consider sites to the west of the Orwell Bridge which would be a better location from a strategic transport point of view.

Park and Ride sites and car parking

157. EDF Energy has confirmed in Stage 3 their preferred Park and Ride sites, at Lower Hacheston at the A12 Wickham Market Junction, and at Darsham. Access arrangements to the Darsham site have changed, to join the A12 North of Willow Marsh Lane.
158. The Councils continue to support the principle of Park and Ride sites to transport workers to the development site and are content with the proposed locations. However, as already noted at Stage 2, 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.

Wickham Market mitigation

159. The Stage 3 proposals include two options to mitigate potential delays on the B1078 in Wickham Market, between Border Cot Lane and the River Deben Bridge, as a result of increased car traffic on the B1078. Option 1 is the temporary removal/restriction of on-street parking on this stretch of the

road, while Option 2 is a diversion via Glevering Bridge, with improvements to Valley Road and Easton Road.

160. There are significant concerns about each of the two options. The use of a narrow, weight restricted, listed bridge (Glevering Bridge) appears unrealistic, equally alternatives such as restricting parking through Wickham Market High Street raise concerns. We expect EDF Energy to reconsider this and establish alternative solutions for Wickham Market.

Impacts on the wider road, rights of way and cycling network

161. In their Stage 3 proposals, EDF Energy propose a number of minor road improvement at other locations: The junctions of A140/B1078 west of Coddendam, B1078/B1079 east of Easton and Otley College, A12/B1119 at Saxmundham, A1094/B1069 south of Knodishall and A12/A144 south of Bramfield.
162. For a road-led strategy, and to some extent a rail-led strategy, the Councils are still considering the impacts on the wider road network and whether additional mitigation beyond those listed above will be required. In the case of a road-led strategy, the Councils initial assessment suggests that there will be a greater detrimental impact on the A12 and adjacent road network when compared to the rail-led strategy. These impacts are
- a) Congestion in the Woodbridge area leading to light vehicles diverting onto other local roads such as the A1120 and B1078 (HGV's will be restricted to the A12);
 - b) Greater instances of 'platooning' of vehicles caused by the increased numbers of HGVs resulting in longer journey times, delays and driver frustration for users of the A12;
 - c) Increased delays and queueing on side roads (for example C309 Bredfield, A1120 Yoxford) leading to driver frustration and hence more high-risk manoeuvres;
 - d) Drivers of local and Sizewell generated car and light vehicle trips diverting onto unsuitable roads forming part of the local road network when seeking to benefit from real or perceived shorter journey times or less trafficked routes;
 - e) Severance issues for local communities (e.g. Marlesford and Little Glemham) and users of the rights of way network;
 - f) Increased maintenance costs of highway infrastructure due to increased volume of HGV's, particularly the evolved parts of the A12 and B1122;
 - g) The possible extension of the operating hours beyond the 0700-2300 window causing additional disruption to communities adjacent to the A12 and other access routes.
163. The Councils believe there will be further stress on a number of junctions and communities as a result of the road-led strategy. This is expected to include, but not limited to the following junctions: Seven Hills A12/A14, Martlesham junctions, Woodbridge bypass junctions, A12/C309 Bredfield,

A12/C244 Little Glemham, A12/A144 Halesworth, A12/A145 Beccles
A12/A1095 Southwold.

164. The modelling suggests a significant increase, of 1,100 vehicles per day, on the B1078 near Wickham Market. This may mean that additional mitigation measures may also be required for other parts of the B1078, including at Coddendam. Alternatively, measures should be taken on the main routes to encourage traffic to remain on them rather than diverting onto inappropriate roads.
165. Further work needs also to be undertaken with regard to mitigation and improvements to the Public Rights of Way and cycling network. Any route diversions, not least of the England Coast Path, need to be viable and attractive alternatives. The cycle route network should be improved, both as a mitigation for local amenity and tourism impacts, as well as providing accessibility to the site for the workforce of Sizewell C.

In-Combination effects

166. The Suffolk Coast is subject to proposals not only for Sizewell C, but also for four phases of the East Anglia Offshore Wind Array (by Scottish Power Renewables), two interconnectors to Belgium and the Netherlands by National Grid Ventures, possible extensions to the Galloper and Greater Gabbard windfarms and a further Round 4 of offshore windfarm proposals by The Crown Estates. We expect that most, if not all, of these proposals would have land-based development in the Sizewell area. These are likely to have a considerable adverse impact on the communities, environment and businesses of the area. Some of these outcomes will be beneficial while others will potentially be harmful.
167. In managing these impacts, the Councils consider that the way in which new projects are brought forward, on a case-by-case basis, limits the ability for their consequences to be seen as a whole and for wider economies of scale to be achieved. From the perspective of Government, and its desire to minimise the costs to the consumer, the macro-economic outcome is actually an increased cost to the consumer, while at a more local level, the likelihood is that it will create greater damage to the environment than could otherwise be achieved.
168. For some time, the Councils have been concerned about the consequences of no one area of Government having an overview of the whole process across all the schemes and we have raised this with the Department for Business, Energy and Industrial Strategy and the Ministry for Housing, Communities and Local Government.
169. Whilst the Councils will have to consider each proposal on its own merit, they want to ensure the in-combination effects are also considered. Concerns include the need for sequencing of bringing additional capacity on stream, allocation of appropriate sites (offshore and onshore) and how additional capacity is linked into the grid.
170. Skills, education and employment outcomes can be increased by aligning activity across all energy developments. Although there are some specific skills required in each sector, a large proportion of the workforce across the

energy industry are required to have a common foundation of skills with specific sector-based competency top ups.

171. By assessing the skills and competency requirements of all energy projects we can ensure that we are training local residents to seamlessly transfer from one sector as it demobilises into another sector as it mobilises, avoiding a boom and bust employment market. This demonstrates a true legacy approach to employment and skills, capitalising on the in-combination effects of the plethora of energy projects being proposed.
172. Most importantly for the local community, there is an urgent need to consider the environmental and community impacts across all schemes, and a joint approach to mitigation. There is currently an inability to have a joint approach to mitigation – while developers need to consider the in-combination effects of publicly promoted schemes; each scheme is considered on a “stand-alone” basis in their mitigation proposals.
173. It is recommended that the Councils continue to promote and lobby for the following:
 - a) That Government, or one of its agencies, to be charged with taking the lead on the coordination of the projects in a way that enables their overall impact to be assessed in advance before commitments are made to initial schemes and that allows for the efficiencies now afforded by developing offshore transmission technology to be locked into the process for the long term benefit of the consumer;
 - b) That EDF Energy is asked to work closely with other developers, including Scottish Power Renewables and National Grid Ventures, to consider how mitigation across the schemes can be combined to minimise the impact of the totality of developments on the local area.

Next Steps

174. It has been two years since the Stage 2 consultation and it is clear from the contents of this Stage 3 consultation that the project has not sufficiently moved forward in terms of the detail that is publicly available, considering that this is expected to be the last round of public consultation. 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.
175. 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 the decisive influence, but we must continue to make our representations. Therefore, the Councils will look to the work programme for 2019 and beyond to influence the outcome in a way that is beneficial to the people of Suffolk. As a consultee we are not the decision maker, but we will work with all parties to do all that we can to maximise the benefits for the area and influence positive outcomes.
176. The Councils invited Town and Parish Councils to an event in January 2019, to learn more about specific concerns and local impacts that local community leaders have in mind and the issues and areas they are getting asked about by their residents. While the communities said that EDF

Energy had taken on some of the feedback given by local communities as part of their Stage 2 consultation, there still were a number of areas where they were not content and others that lacked detail and were of concern. Elements of mitigation where further information would be beneficial primarily focused on transport and accommodation. There is also a clear sentiment that EDF Energy need to do more to try and make a marine-led strategy work as a preferred option. Other key areas of concern raised by the community at the event included concerns around the introduction of pylons, the design of the station, the proposal for a road-led construction strategy, impacts on the existing road infrastructure and pressures on local services. There were also concerns about the level of benefit for the local population in comparison to the disruption caused by the development.

177. 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 EDF Energy may submit their DCO application in early 2020. Hinkley Point C is under construction and it has been stated that there are economy of scale savings to be derived from the timely phasing of the developments at Hinkley and Sizewell. That being the case we need to ensure we are fully prepared for the next stages.
178. It is therefore recommended that the Cabinets endorse the need for significant engagement with the Councils through 2019, working closely with other statutory and non-statutory bodies, as required, to develop an evidence base on the impacts of all aspects of the proposal and develop the avoid/mitigate/compensate options.
179. To deliver infrastructure of this scale effectively, alongside other large infrastructure projects in Suffolk, the Sizewell C development requires EDF Energy, the 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 will 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 SEGWay, 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 including a large number of energy-related nationally significant infrastructure proposals;
 - c) To persuade Government to agree 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.

180. Alongside this local and national engagement, the Councils' officers will continue to work closely with EDF Energy and will input the emerging specific local issues favoured through the local engagement into the process for consideration.
181. 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. Currently the funding of officer time for the pre-application process is funded by EDF Energy via a PPA that funds officer time directly attributable to work EDF Energy require to help them develop their plans. The levels of funding from EDF Energy have recently been reviewed and are considered adequate.
182. However, the funding of work that is not directly relevant/attribution to the preparation of the 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.
183. 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 of evidence and drafting of S106 agreements.
184. If the development was consented and the scheme was to be delivered it would fall to the new East Suffolk District Council, or potentially in some instances the County Council, 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 relevant future matter.

APPENDIX	
Draft Joint response to EDF Energy's Stage 3 Consultation from Suffolk Coastal District Council and Suffolk County Council	Page

Sources of further information		
Date	Type	Available from
04/01/2019	EDF Energy Stage 3 Consultation Documents	https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/proposals/stage-3
22/01/2013	Department of Energy and Climate Change: National Policy Statements: Overarching Energy (EN-1) and Nuclear Power	https://www.gov.uk/government/publications/national-policy-statements-for-energy-infrastructure

	Generation (EN-6)	
June 2014	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
29/01/2013	Cabinet Report “Response to EDF Energy's Sizewell C Stage 2 Public Consultation”	https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(31-01-2017),%20The%20Cabinet
29/01/2013	Cabinet Report “Sizewell C Nuclear Power Station – Response of Suffolk County Council to Stage 1 Consultation”	https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(29-01-2013),%20The%20Cabinet
July 2017	Boyer/Cannon report “Sizewell C Accommodation Campus Review”	https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/170711-FINAL-Report-Boyer-21.06.2017.pdf
July 2013	Suffolk Coastal District Council Local Plan 2013	http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/existing-local-plan/core-strategy-and-development-management-policies/
2011	Suffolk Local Transport Plan 2011-2031	https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/
June 2018	Suffolk Minerals & Waste Local Plan Submission Draft	https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/#SMWL
22/01/2019	Feedback from Town and Parish Council engagement event 2019	http://www.eastsuffolk.gov.uk/planning/sizewell-nuclear-power-station/community-engagement/stage-3-high-lodge-darsham-22-january-2019/