

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

SizewellC@planninginspectorate.gov.uk

Our ref: MW/G&D/SizewellC
Your ref: EN010012
Date: 10 June 2020

Dear Sirs,

Planning Act 2008 (as amended) – Section 55

Application by NNB Nuclear Generation (SZC) Limited for an Order Granting Development Consent for a New Nuclear Power Station Development at Sizewell in Suffolk (Sizewell C)

Adequacy of consultation request

Thank you for the opportunity to respond on behalf of Essex County Council (ECC) to the above in your letter to the Council as dated 27 May 2020. Essex is a neighbouring authority to the as proposed development and has responded to previous requests for comment through consultation during the process, the last being submitted on the Stage 4 consultation, and dated the 27 September 2019.

We welcome the opportunity to respond on the adequacy of consultation request. Given the time period by which our comments have to be made, and the significant impact the current COVID-19 pandemic is having on the Council, on its stakeholders and its services across a multitude of functions, this response is predicated by the time available across the Council at this time.

It is not for this Council to comment in detail as to the impact of the development in Suffolk, and no comment is made on the merits of the proposal, however there is a synergy across a number of key topics going forward including transport, skills, education and socio economics which will have significant cross border implications. We are also minded that there is a relationship between the proposals here and for development at Bradwell in Essex, where Stage 1 Consultation is currently running for the development of an additional new nuclear generating facility on the adjacent Essex coast.

In making this response ECC are minded of the comments as will be raised by Suffolk County Council in respect of the adequacy of consultation. Suffolk's comments are both detailed and significant.

From an Essex perspective the comments on the adequacy of consultation are as follows:

- We have not seen any refinement of the proposals between stages 3 and 4 of the consultation process to include what we consider is a necessary explanation of cumulative impact of the proposals to evaluate any potential impact the development could have on Essex. The consultation process seeks to ensure that as many subjects as possible and be incorporated into any Statement of Common Ground, resolving as many issues as it practical prior to the formal submission of the DCO. Levels of growth and strategic projects should be considered in terms of both the pressure placed on construction materials, availability of skilled labour, and the potential delays to freight/employee movements of the Sizewell C development proposal.
- There is no evidence within the consultation process as to why a marine led strategy, considered of significant importance to ensure the establishment of a sustainable transport strategy, has been abandoned.

- There remains a significant lack of detail afforded to the rail-led strategy, or indeed to qualify what rail strategy is now specifically proposed, which we consider is unclear, and which should be explored before the formal DCO process is considered, again being mindful of providing a sustainable transport strategy.
- Previously ECC has supported the comments as made by Suffolk to the lack of detailed evidence on the ecological and archaeological impacts of the development, including methods to mitigate and compensate against significant impact. These concerns remain outstanding.
- At Stage 3 of the Consultation Essex County Council made comments on the adequacy of detail to assess the economic impact/skills/communities impact of the development which were not responded to in the 4th Consultation, hence the previously stated concerns also remain unresolved.
- Previously at Stage 3 the Council has raised issues about the true impact the development would have on the tourist industry in this sensitive rural location asking that any future DCO application includes a tourism strategy and proposed specific mitigation measures to reduce any potential impact. This does not feature in the submitted Stage 4 documentation and therefore cannot be considered pre the DCO process.
- The interrelationships and linkages with the as proposed Bradwell B power station in Essex have not been proven, tested and evaluated.
- No design review of the power station appears to have been carried out.
- There appears to be no justification for the as proposed accommodation complex.
- ECC requested that a mineral supply audit be carried out in relation to the proposal to consider the approximate volume of aggregates required to facilitate the development on a phased basis, the broad area(s) where aggregate will likely be supplied from, implications for this demand on local aggregate supply and link into existing work carried out around the impact on any proximal infrastructure that may potentially arise as a consequence of the need to import that aggregate, in accordance with Para 207 of the National Planning Policy Framework (NPPF). The ability for proximal mineral authorities to accommodate the mineral demand of a local project of the uniqueness of Sizewell C would greatly benefit from the submission of such an aggregate supply audit.
- Essex County Council has not been able to make any specific allowance, qualitative or otherwise, relating to the demand the construction of the facility may have on the county's existing aggregate reserves. It is acknowledged that material would need to come from a wide area and may not be attributable to any one Mineral Planning Authority area. It is further acknowledged that market availability will dictate where the mineral is sourced from and hence any detailed quantification at an administrative level may not be possible. An assessment of the approximate volume of material required and its potential supply areas should be submitted
- The development will have an impact on ECC in its role as the Waste Planning Authority and the lack of an audit and associated management to identify the composition and volumes of waste arising is noted.
- ECC notes that the applicant has not submitted a Statement of Common Ground, nor has the Council's seen substantive documents which make up the necessary Environmental Impact Assessment, including the Transport Strategy pre DCO submission.
- We echo Suffolk's concerns that that there has not been adequate information available at the consultation stages to allow a properly informed response from stakeholders and the public at this time.

I would be grateful if you could take the above comments into account. If you require further information or clarification on any points raised in this response please contact Mark Woodger, Principal Planning Officer (Major Development and New Communities) by email mark.woodger@essex.gov.uk or telephone: 443330322458

Yours sincerely



Graham Thomas
Head of Planning and Development