

**From:** [REDACTED]  
**To:** [SizewellC](#)  
**Subject:** Emailing: Response to Rule 6 letter  
**Date:** 10 March 2021 10:33:13  
**Attachments:** [image001.png](#)  
[Response to Rule 6 letter.pdf](#)

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Dear Michele and team,

Please see the attached letter to the ExA in response to the Rule 6 letter.

I have filled in the online form, however, it does not allow multiple entrants with regards to representation at the preliminary meetings.

As you will see in the attached:

East Suffolk Council will attend both Preliminary Meetings on Sizewell C.

At both meetings we will be represented by:

Andrew Tait QC [REDACTED] [@ftbchambers.co.uk](#)  
Philip Ridley [REDACTED] [@eastsuffolk.gov.uk](#)

Could they both please have log-ins for the PM's?

Thanks very much,

Lisa



**Lisa Chandler | BSc (Hons) MA DMS MRTPI**  
**Energy Projects Manager**

East Suffolk Council

[REDACTED] | PLEASE NOTE I AM NOW AVAILABLE ON  
THIS NUMBER.

[www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)

[www.eastsuffolkmeansbusiness.co.uk](http://www.eastsuffolkmeansbusiness.co.uk)

**East Suffolk Council will continue to review and prioritise the  
delivery of its services during this unprecedented time.**

The COVID-19 outbreak will severely impact what we are able  
to do, however we will continue to support and protect our  
communities, delivering the critical services you need.

Your message is ready to be sent with the following file or link attachments:

Response to Rule 6 letter

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Wendy McKay  
Lead Examiner  
Examining Authority (ExA)

sizewellc@planninginspectorate.gov.uk

**Your ref:** EN010012

**Our ref:** 20026200

**Date:** 10 March 2021

**Please ask for:** Mrs. Lisa Chandler

**Customer Services:** 03330 162 000

**Email:** [REDACTED]@eastsuffolk.gov.uk

Dear Ms. McKay,

**Procedural Deadline A: 10 March 2021**

**Request to appear at the Preliminary Meeting(s) as an Interested Party: 20026200**

**Tuesday 23 March (Part 1)**

**Wednesday 14 April (Part 2)**

East Suffolk Council (ESC) (20026200) request to be heard orally at the Preliminary Meeting Part 1 and Part 2.

ESC will require log-ins for Andrew Tait QC ([Andrew.tait@ftbchambers.co.uk](mailto:Andrew.tait@ftbchambers.co.uk)) and Philip Ridley, Head of Planning and Coastal Management ([Philip.ridley@eastsuffolk.gov.uk](mailto:Philip.ridley@eastsuffolk.gov.uk)).

ESC will be wanting to contribute on:

Item 4: Initial Assessment of Principal Issues – Annex C

Item 5: The Applicant's proposed changes to the application – Annex B

Item 6: Draft Examination Timetable – Annex D

Item 7: Procedural Decisions taken by the ExA – Annex E

**Item 4: Initial Assessment of Principal Issues – Annex C**

ESC welcomes the identification of principal issues put forward by the Examining Authority (ExA). However, we consider there to be a small number of omissions / suggested revisions to the list that would be of benefit to the ExA. We note the interrelationship and overlap between Principal Issues, however, we would like the following to be considered explicitly by the ExA:

- a. The list refers to the beach landing facility under Transport, and the defence adaptations under Climate Change. The proposed hard coastal defence together with the soft coastal defence (that is proposed as mitigation for the negative impact of the former) plus the temporary and permanent beach landing facilities have potential to cause significant impacts on coastal

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LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

processes. All the above was the subject of significant design changes in the January 2021 submissions. At the time of writing, we are awaiting the supply by the Applicant of full details of those changes and a comprehensive updated assessment of their impacts. It is essential that these issues should be given thorough scrutiny as part of the Examination process. We therefore request that the Coastal Geomorphology topic, covering the aforementioned items and the Coastal Monitoring and Mitigation Plan, should feature more prominently in the list of Principal Issues and that coastal processes be considered as an item for an Issue Specific Hearing.

- b. The location of the Main Development Site in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) is considered to be a key issues, and we raise a concern that its inclusion under “impact on landscape and visual amenity, including the setting of protected landscapes”, may not give it the prominence that it warrants as a nationally protected landscape, designated as such to protect the land so as to conserve and enhance its natural beauty. ESC considers that impacts on the AONB will need to be appropriately considered as a Principal Issue alongside and as part of landscape and visual amenity.
- c. Recreational Displacement is not mentioned explicitly in either Amenity and recreation or under Habitats Regulation Assessment matters. We consider that this should be included for clarity.
- d. Potable / non-potable water supply is a key issue that should be given prominence in the list of Principal Issues rather than as part of the waste (conventional) and material resource topic. Alongside this, the use of borrow pits is not identified under this heading and we consider that it should be specifically identified as a Principal Issue and examined accordingly.
- e. ESC has a concern that potential impacts on local communities has not been given the prominence it deserves in the initial assessment of principal issues. Health and wellbeing and socio-economic topics may not adequately cover potential impacts arising from an influx of non-home-based workers to the locality; this includes areas outside of local law and order including anti-social behaviour, local attitudes, and worker attitudes to one another. The residual community impacts need a place to be discussed.
- f. ESC considers the socio-economic section should be expanded to include reference to skills enhancement packages.
- g. The Council considers the deliverability of the freight management strategy, transport management plans, and the need for vehicular movement caps should be included under Traffic and transport topic.

#### Item 5: The Applicant’s proposed changes to the application – Annex B

In response to the ExA questions, ESC considers that the submission of the changes to the DCO do not, in substance, change the DCO as originally applied for. ESC agrees with the Applicant’s

assessment of which changes are to be considered material, but we do not conclude that the substance of the proposal is different to the original proposal as a result of the proposed changes.

If accepted by the ExA, the change submission should be examined as an integral part of the DCO examination; it would not be practical to examine the change submission as an addendum to the original proposal.

We are still awaiting some modelling from the Applicant in relation to the changes to the beach landing facilities and coastal defences, and we may be inhibited in our ability to respond depending on when that information is received. If receipt of that information is delayed, it may be that these elements will need to be examined later in the Examination timetable to enable full input from ESC.

The Council notes that the change application explains that the amount of material required for the Sizewell C construction is now assumed to be increased by 20% compared to the original DCO application. The Council considers that, if the element of the change application which concerns the freight management strategy, i.e., beach landing facility and additional train paths, is not accepted, the updated information on the amounts of materials would result in a change to the number of HGV movements which was not assessed in the Transport Assessment submitted with the original DCO application (nor in the change application). Whilst it is not clear if the 20% increase of materials would equate to a 20% increase in HGV movements, it is considered that the consequential change of traffic impacts would be material. In short, the Council considers that there would be a material change in transport terms, even if the proposals within the change application were not accepted, and time would need to be allowed in programming the Examination for (1) the Applicant to provide updated documentation showing the full effects of the increase in materials in that scenario and (2) for Interested Parties to have a full opportunity to engage with that additional information.

ESC also notes that there is, at the present time, some uncertainty about the deliverability of both the beach landing facilities and the required Network Rail improvements to allow for the additional train path. Should the change application be accepted, the Council would want these issues to be considered and this may affect the timing of some parts of the Examination.

## **Item 6: Draft Examination Timetable – Annex D**

The time scheduled for Issue Specific Hearings is noted and welcomed. However, given the large number of potential issues for discussion identified in Annex C, we welcome the setting out of Issue Specific Hearing dates and additional dates (if required) at this stage. Given the complexity of the proposal, keeping to the examination timetable will be very important.

In addition to the considerable amount of documentation that the Council is likely to have to consider in order to make informed contributions throughout the examination, it should also be noted that the Examination is scheduled across the period during which Covid-19 restrictions are

expected to be relaxed. There are a great number of Council staff who have been working under considerable pressure for the last twelve months and are entitled to and hoping for a break. It is hoped that gaps will continue to be maintained in the Examination timetable devoid of deadlines that could be utilised by those staff requiring a break.

## Item 7: Procedural Decisions taken by the ExA – Annex E

It is noted that it is proposed that agendas for Issue Specific Hearings will be issued five working days in advance of each Hearing. Given that some of the Hearings may require attendance in person, there may need to be travel and hotel arrangements made for consultants working on behalf of the Council. This area of Suffolk is very popular with tourists and hotel accommodation is likely to be fully booked in the summer periods. Early advance knowledge of the subject areas to be discussed at each Issue Specific Hearing would enable proper planning of attendance to take place by the Council.

The Council welcomes the proposal for initial Statement of Common Ground at Deadline 1 and finalised Statement of Common Ground at Deadline 8. The Council requests that no further interim Statements of Common Ground be added to the schedule as experience has proved that this can be very time and resource intensive for the Council, with limited benefit.

It is ESC's intention to be party to a Statement of Common Ground joint with Suffolk County Council and the Applicant.

ESC has reviewed Annex E and note's the list of potential Statement of Common Grounds proposed and note that the Suffolk Coast Destination Management Organisation is not included in that list. It is suggested that the ExA would benefit from a Statement of Common Ground between the Applicant and the Suffolk Coast Destination Management Organisation.

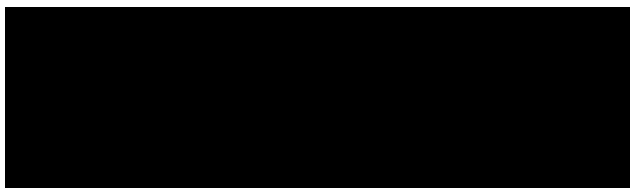
It is ESC's intention to submit a Local Impact Report written jointly with Suffolk County Council at Deadline 1.

ESC will comment on the Applicant's submitted draft Accompanied Site Inspection schedule by Deadline 1. In doing so, we will refer to the need to comply with Covid-19 safety requirements and restrictions in place at the time.

With reference to the ongoing Covid-19 situation, ESC welcomes that the start of the Examination is to be held via virtual meetings. We note that it may be possible at the later stages of the Examination timetable for meetings and hearings to be held in person. Should that be determined appropriate, the Council asks that the ability to participate virtually for all Interested Parties should

they choose to do so for safety or practical reasons be maintained throughout the whole Examination period.

Yours sincerely,



**Lisa Chandler | Energy Projects Manager**  
East Suffolk Council