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To: [SizewellC](#)
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Subject: Suffolk County Council Written Submission on Examination procedures and timetable - Procedural Deadline A - ID Number: 20026012
Date: 10 March 2021 13:37:18
Attachments: [SCC Procedural Deadline A response.pdf](#)

Dear Sir/Madam

Please find attached Suffolk County Council's written submission for Procedural Deadline A. Please confirm receipt.

Please note that, whilst I have submitted on behalf of Suffolk County Council the online form (referring to the attached document with regard to the issues we wish to raise), as set out in the attached submission the Council will require in addition to a log-in for myself also log-ins for Michael Bedford QC ([REDACTED]@cornerstonebarristers.com) and Alastair Lewis, Solicitor ([REDACTED]@sharpepritchard.co.uk).

Yours faithfully
Michael Moll

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The Sizewell C Project, Ref. EN010012

Suffolk County Council Written Submission on Examination procedures and timetable

In response to the [Rule 6 letter](#) dated 23 February 2021

Procedural Deadline A

10 March 2021

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GLOSSARY OF ACRONYMS

<i>AONB</i>	<i>Suffolk Coast and Heaths Area of Outstanding Natural Beauty</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>HGV</i>	<i>Heavy Goods Vehicle</i>
<i>SZC Co.</i>	<i>The applicant</i>
<i>TA</i>	<i>Transport Assessment</i>

“The Council” refers to Suffolk County Council.

A. REQUEST TO BE HEARD ORALLY AT PRELIMINARY MEETING PART 1 AND PART 2

1. Suffolk County Council (“the Council”) requests to be heard orally at the Preliminary Meetings Part 1 and Part 2.
2. The Council will require log-ins for Michael Bedford QC (██████████@cornerstonebarristers.com), Michael Moll, Programme Director Sizewell C (██████████@suffolk.gov.uk) and Alastair Lewis, Solicitor (██████████@sharpepritchard.co.uk).
3. The Council wishes 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
4. The sections below highlight the key points the Council will wish to make.

B. COMMENTS ON ITEM 4: INITIAL ASSESSMENT OF PRINCIPAL ISSUES

5. The Council notes that the list of principal issues is not intended to be comprehensive or exclusive, however, the Council considers the following key issues, which are currently only implied, should be referenced to reflect their importance (the order of these comments is alphabetic):
 - a. **Area of Outstanding Natural Beauty (AONB) impacts:** The AONB is a national statutory designation and whilst there is no statutory definition of ‘natural beauty’, the AONB Management Plan recognises that the concept embraces wider matters than landscape and scenic quality and includes relative wildness, intrusiveness/relative tranquillity, natural heritage, cultural heritage, and (human) associations. The impacts on these special characteristics of the AONB are currently only indirectly referenced, under the “Landscape Impact” heading. In the Council’s view, the AONB should be considered as a separate heading, given the importance of the AONB as recognised in National Planning Statement EN-6 and the need to consider impacts on all its special characteristics, both individually and cumulatively.
 - b. **Biodiversity and ecology or Amenity and Recreation:** The Council considers one of these issues should include reference to recreational displacement.
 - c. **Coastal geomorphology** (currently only referred to under the “Climate change and resilience” heading, and beach landing facilities under Transport): The Council considers that the development’s impact on coastal geomorphology should be considered as a key issue in its own right, to cover potential impacts on coastal processes from the proposed hard coastal sea defence together with the soft coastal defence and the temporary and permanent beach landing facilities, and the Coastal Monitoring and Mitigation Plan.
 - d. **Potable / non-potable water supply:** The Council considers this a key issue that should be given more prominence in the list of Principal Issues, and not only be referenced under “Waste (conventional) and material resource”.

- e. **Socio-economic:** The Council considers that this issue should also refer to
 - Skills enhancement packages
 - Residual community impacts
- f. **Traffic and Transport:** The Council considers the deliverability of the freight transport strategy, transport management plans, and the need for vehicular movement caps should each be included under this issue.
- g. **Waste (conventional) and material resource:** The Council considers that this issue should also refer to on-site materials strategy, including use of borrow pits and stockpiles.

C. COMMENTS ON ITEM 5: THE APPLICANT'S PROPOSED CHANGES TO THE APPLICATION – ANNEX B

- 6. In respect of the two specific points raised in the Rule 6 letter at the top of page B4:
 - (1) the Council confirms that it considers acceptance of the change request would not mean that the development now proposed is not in substance that which was originally applied for and
 - (2) the Council considers that, if accepted, the examination of the change application should be conducted as an integral part of the examination of the DCO proposals (i.e., avoiding the need for interested parties to address the original proposals as well as the proposals as changed).
- 7. While the Council notes that the Preliminary Meeting is not the place for discussion of the merits of the change application, the Council does wish to draw attention to one aspect of the material supporting the change application, because it has a bearing on the programming of the Examination, even if the change application is not accepted.
- 8. 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. It 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 TA 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.
- 9. The Council 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, and further modelling of coastal processes impacts to be submitted in relation to the beach landing facilities and

coastal defences. 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.

D. COMMENTS ON ITEM 6: DRAFT EXAMINATION TIMETABLE – ANNEX D

10. The Council welcomes the fact that Deadline 1 and Open Floor Hearings are proposed to take place after polling day for the local elections.
11. In relation to the large number of issues to be discussed and the expected numbers of participants at Issue Specific Hearings, the Council suggests that, notwithstanding the primarily written nature of the Examination, the Examining Authority may wish to consider incorporating additional Reserve Dates for Issue Specific Hearings (over and above the two reserve weeks already indicated) into the timetable at this early stage, to enable all stakeholders to plan resources accordingly. The Council would also invite the Examining Authority to consider whether it would be possible to identify particular blocs of time during the summer period when no Examination events would be scheduled, so as to allow participants to plan when to take annual leave. Lastly on the timetable, the Council would ask whether it will be possible to specify the general topics to be discussed at particular Issue Specific Hearings at an early stage (e.g., by Deadline 2) to assist in resource and personnel planning.

E. COMMENTS ON ITEM 7: PROCEDURAL DECISIONS TAKEN BY THE EXA – ANNEX E

12. The Council confirms that it intends to:
 - a. Be party to a tripartite Statement of Common Ground with the applicant and East Suffolk Council, and confirms that it will be looking to indicate clearly which authority is agreeing what common ground.
 - b. Submit a Local Impact Report written jointly with East Suffolk Council by Deadline 1.
 - c. Comment on the Applicant's draft Accompanied Site Inspection schedule by Deadline 1.
 - d. Continue to work with the Applicant on other key documents, including Section 106 and the DCO.
13. Given the Government's timetable for easing COVID restrictions, the Council is hopeful that some of the hearings can take place in person, to complement virtual hearings. Hearings in person are particularly important for issues with strong community involvement such as the Open Floor Hearings. If the Government's timetable holds true, consideration should be given to a second set of Open Floor Hearings to be held in person. The Council wishes to stress that, based on experience from the recent [East Anglia 1 North](#) and [East Anglia 2](#) hearings, it sees merit in continuing to have some virtual hearings in any event. If it is considered that meetings should be held in person, the Council asks that Interested Parties should still be able to participate virtually for safety or practical reasons.