

Cllr Louise Gooch
East Suffolk Council
Responding in a personal capacity
[REDACTED]@east Suffolk.gov.uk
March 10th, 2021

The Sizewell C Project Case Team
National Infrastructure Planning

Unique Reference: 20026488

Dear team,

**Re.: Application for the Development Consent Order for the project of Sizewell C;
Examining Authority's Preliminary Meeting on Tuesday March 23rd, 2021 (or
Wednesday 24th); response to Rule 6 Letter**

Due to daytime work commitments, I am unable to attend the Preliminary Meeting. Thus, please accept my comments below as an additional written submission to my earlier recorded comments (Sept. 29th, 2020).

I am an East Suffolk Council Cllr for the Lowestoft south ward of Kirkley and Pakefield. I am writing this in an entirely personal capacity.

Re. Agenda Item 5

I am concerned that the timing of the announcement of changes made by EDF to the initial planning application have not permitted adequate scrutiny by either the residents of East Suffolk or by statutory consultee bodies.

The *New Civil Engineer* reported concerns about the application in the article: "Sizewell C | Fears design changes will be rushed through on £20bn nuclear plant"
(14 JAN, 2021 BY ROB HORGAN)

In relation to the amendments made to the original planning application, the article stated:

"The Environment Agency and Natural England have raised concerns that design changes made to the proposed £20bn Sizewell C nuclear power plant will be rushed through without adequate time to be evaluated."

"While the design changes are expected to be deemed within the scope of the original development consent order (DCO) application, both the Environment Agency and Natural England believe that some of the changes are "significant" and need proper evaluation."

"The Environment Agency expressed concerns about the "sheer volume of new and additional information", while Natural England said that without additional time it will "constrain our ability to provide sufficiently complete and robust advice to the Examining Authority".

"Both public bodies also expressed concerns that the current Covid-19 lockdown would impact on their ability to adequately assess the design changes."

The not inconsiderable changes made to the original planning application (change to the SSSI crossing design; change to the location of the Water Resource Storage Area; additional SSSI

fen meadow compensation site; change to Sizewell B relocated facilities proposals; a new Beach Landing Facility (BLF); change to transport delivery strategy; change to sea defence design; and new temporary marine outfall) were submitted in early January, at the time of a second national lockdown, which has had an impact upon public gatherings should protest groups wish to make joint submissions, and on statutory consultees who need to undertake full and detailed local impact assessments on the proposed changes. The deadline for the Local Impact Assessments of May 12th is during Covid-19 restrictions and this must have an effect on the ability of consultees to fully exercise their functions.

I am not commenting on the individual changes themselves; my primary concern is in relation to the entire consultation process. Lockdown both in 2020 and 2021 has prevented face-to-face meetings of the relevant local authorities (Suffolk County Council and East Suffolk Council); it has reduced the ability of local residents to engage fully with the process by attending public presentations; it has curtailed the activities of concerned residents' groups (even the ExA acknowledges the phenomenon of 'videoconferencing fatigue'); and now there is a real danger that statutory consultation bodies will not have, or have had, opportunity to fully scrutinize these changes.

In conclusion, my first submission (Sept. 29th, 2020) protested against the granting of planning permission for Sizewell C for reasons of the impacts on transport; the SSSI and AONB environment; local tourism; and the recklessness of giving a greenlight to another nuclear power station when successive governments have failed to secure a Geological Disposal Facility.

I still stand by my first submission. Additionally, this second submission is to request that if the Examining Authority is minded to do so, it not tigger the legally binding six-month period until it is entirely certain that statutory consultees have had and will have time and opportunity to fully scrutinize EDF's amendments and that, almost certainly, will require Preliminary Meeting Part II on Wednesday April 14th if not further meetings.

Yours faithfully,
Louise
ESC Cllr Louise Gooch