



Appendix A Summary of East Suffolk Council's Comments of other Relevant Representations (Sept 2020)

The following table sets out East Suffolk Council's high-level comments in relation to comments contained within Relevant Representations submitted to the Examining Authority by other key stakeholders in September 2020. This list is not intended to be exhaustive.

Stakeholder	Stakeholder Topic Area / Summary	ESC's Position
Environment Agency (EA) [RR-0374]	<p>The EA raised the following in their RR:</p> <p>Flood Risk – EA have yet to agree that the supporting flood risk modelling is sufficient to consider the extent and consequences of flooding. The current Flood Risk Assessment (FRA) identifies increased flooding to properties without identifying appropriate mitigation and compensation measures. In terms of the objectives of an FRA, this is an unacceptable conclusion.</p> <p>Water Supply - The water supply options described do not provide evidence to demonstrate that a suitable and ecologically sustainable source of water can be provided to the Sizewell C Project.</p> <p>Terrestrial Ecology –The proposed use of culverts will have significant impacts to watercourses, designated habitats and protected species. Current assessments do not sufficiently identify likely impacts or provide appropriate mitigation and/or compensation measures.</p>	<p>ESC agrees with these specific comments of the EA - the Council expects any proposal to have appropriate surface water drainage infrastructure which prioritises the use of SuDS and does not increase existing surface water flood risk. Currently, some of the proposals cause concern in this respect.</p> <p>ESC agrees with these specific comments of the EA - this is a potentially significant ongoing issue for which there are no clear answers in the DCO documents.</p> <p>ESC agrees with these specific comments of the EA - the SSSI Crossing option selected (embankment and culvert) is not considered to be the least impacting available technique.</p> <p>Further detail on areas of alliance is in our Local Impact Report.</p>

<p>Marine Management Organisation (MMO) [RR-0744]</p>	<p>The MMO notes that the coastal defence features will be positioned landward of current Mean High Water Springs (MHWS). As this is outside of the MMO's jurisdiction, the conditions in the DML relating to these works will not be enforceable by the MMO. These conditions will need to be secured elsewhere in the DCO so that they can be enforced by East Suffolk Council.</p> <p>The MMO is also concerned about the level of detail provided in the application documents. Throughout the application, particularly in the Habitats Regulation Assessment (HRA), the level of detail provided is lacking.</p>	<p>ESC agrees with these specific comments of the MMO. Further detail is provided in our Local Impact Report.</p>
<p>Natural England (NE) [RR-0878]</p>	<p>Natural England highlighted that in the context of their remit, a significant amount of further information is required before it can be determined as to whether or not the proposal will have significant impacts on a number of internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), nationally designated sites (Sites of Special Scientific Interest (SSSIs)), protected species, ancient woodland, a nationally protected landscape (Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)) and the Aldeburgh to Hopton on Sea stretch of the England Coast Path (ECP). Natural England's advice is that, in relation to these issues, there are fundamental reasons of principle why the project should not be permitted in its current form. Some of these may not be possible to overcome as proposed. For others, the applicant has provided insufficient information to establish the significance of impacts or efficacy of avoidance, mitigation and/or compensation proposals but they consider these to be potentially resolvable with the submission of further information.</p>	<p>In reference to the Shadow HRA, ESC agrees that long-lasting damage and disturbance would be caused by the current proposals. It is Natural England's responsibility to provide further comment on the Shadow HRA provided by SZC Co. Further areas where ESC is aligned with NE will be clear in reading the Local Impact Report.</p>
<p>National Trust [RR-0877]</p>	<p>The National Trust raise concerns highlighting that the current proposal risks unacceptably damaging the integrity and beauty of the site at Dunwich Heath and the wider landscape. The Trust is concerned about the methodology and conclusions of some assessments</p>	<p>ESC agrees with the National Trust, acknowledging that after the impacts on Upper Abbey Farm, one of the greatest construction phase impact from the Main Development Site will be on the non-designated heritage assets (NDHA) - Coastguard Cottages at Dunwich Heath, due to physical and visual proximity and the fact</p>

	submitted with the application, the absence of some key assessments and inadequate proposals for monitoring, mitigation and compensation. There is also a lack of overall integrated consideration of the cumulative impact of the proposal at a landscape scale. The Trust welcomes the applicant's proposal of a ring-fenced Resilience Fund, although have states that they will also need access to other appropriate funds where on-going monitoring identifies that mitigation is required, not least as this enables the Trust to work in partnership to deliver mitigation with conservation partners.	that the cottages face Sizewell directly. Further detail is available in our Local Impact Report.
New Anglia Local Enterprise Partnership (NALEP) [RR-0883]	New Anglia LEP have highlighted their support for Sizewell C and the opportunity it offers to tackle the climate emergency and progress to 'Net Zero' while boosting the economy in Suffolk and throughout East Anglia. They are interested in the positive impact on local business growth and investment, supply chains, local employment, skills and education, infrastructure and impact on key sectors such as tourism.	ESC agrees with these specific comments of NALEP.
Stantec on behalf of Suffolk Constabulary [RR-1140]	Suffolk Constabulary is the territorial police force responsible for the county of Suffolk and has a mission to make Suffolk a safer place to live, work, travel and invest. Their RR highlighted possible community safety impacts relating to substantial demographic changes, traffic changes, and changes in emergency / civil contingency planning, preparedness and response requirements. Concerns raised included the following - the narrow scope of assessment regarding the singular focus of the policing impact assessment on recorded crimes – this is inadequate; limited consideration of demographic risks; sufficient information has not been provided regarding the range of potential transport impacts likely to require a net additional police response.	ESC agrees with these specific concerns and are working closely with colleagues in Suffolk Constabulary and SCC in order to fully understand potential impacts and the mitigation that may be necessary possibly by SZC Co. funding additional Police and contributing to existing community work in the most likely affected area (Leiston). Further detail is available in our Local Impact Report.
Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) [RR-1170]	The AONB have submitted a detailed RR highlighting their concerns which relate to their main concerns that the proposal will have a negative impact on the statutory purpose of the AONB to conserve and enhance natural beauty, that the proposal will have a greater	ESC is a member of the AONB and supports the majority of the views put forward by the AONB in their RR, further elaboration of ESC's consideration of the potential impacts on the AONB arising from the Sizewell C proposal are in the Local Impact Report.

	<p>impact than concluded by the Applicant on the AONB, that the AONB is a national designation and should not be linked to the Heritage Coast, they are separate entities, and the Applicant has not demonstrated due regard to the purposes of the AONB. The AONB do not agree with the Applicants analysis of the cumulative impacts of the proposed development on the AONB and consider the introduction of pylons to be unacceptable. Impacts on tourism have not been properly acknowledged or mitigated and considers the construction phase impacts have been underrepresented by the Applicant. The loss of Site of Special Scientific Interest is unacceptable, and specific design related details not properly taking into account the AONB.</p>	
<p>Suffolk County Council (SCC) [RR-1174]</p>	<p>SCC has provided a detailed summary their support in principle of new nuclear at Sizewell but highlighting that they cannot support the current submitted proposals without revision as it does not sufficiently avoid, minimise, mitigate or compensate for the impacts it will have on the communities and environment of Suffolk. In particular, as local highways authority, SCC raise strong concerns with the proposed freight management strategy.</p>	<p>ESC works closely with SCC and continues to do so; our joint Local Impact Report will be submitted at Deadline 1 clearly detailing the many areas that the Councils are aligned on.</p>
<p>Historic England (HE) [RR-0473]</p>	<p>HE notes their primary onshore consideration is the impact of the main development site upon the significance of two designated heritage assets known as the Leiston Abbey First and Second Sites.</p>	<p>ESC notes their interest and supports HE in making further commentary with regards to the importance of these Sites.</p>
<p>East Suffolk Internal Drainage Board (ESIDB) [RR-0345]</p>	<p>ESIDB note their concerns the possible impacts the Sizewell C project may have on flood risk within the Internal Drainage District and the wider watershed catchment area, within which the ESIDB has statutory functions. Additionally, the ESIDB is concerned that the project has not fully considered the holistic hydrological impacts of the development or the associated drainage strategy. Changes to water levels may be associated with but not limited to flood risk and drainage management as well as ecology.</p>	<p>This is a very high-level summary of the ESIDB's detailed RR, ESC agrees with the concerns highlighted by the ESIDB, in particular how it relates to wider drainage matters across the main development site and associated developments, and support them in their request for further information / detail to be provided.</p>
<p>Suffolk Wildlife Trust (SWT) [RR-1180]</p>	<p>SWT raise many concerns with regards to the current submission and the lack of sufficient detail in a number of areas in</p>	<p>ESC shares a number of concerns raised by the SWT and is working closely with them, in particular, with regards to the potential</p>

	<p>particular: the general approach to European Protected Species and other ecological designations. Lack of detail re: coastal geomorphology and longer-term impacts arising from coastal defences and other structures, impact on County Wildlife Sites, impact on Sites of Special Scientific Interest, compensatory measures, lighting, water management zones, and other matters across the main development and associated development sites.</p>	<p>impact upon bat populations arising from the proposal.</p>
<p>Royal Society for the Protection of Birds (RSPB) [RR-1059]</p>	<p>RSPB raise many concerns with the current submission and the lack of sufficient detail submitted resulting in being unable to robustly assess the submission. The RSPB's RR raises specific areas of concern in particular with design details for key features, Shadow Habitat Regulations Assessment, conclusions of no adverse effect on integrity of European Protected Sites, lack of cumulative assessment, as an adjacent landowner (RSPB Minsmere), hydrological impacts, noise and visual disturbance, lighting, displacement of beach users, amongst others.</p>	<p>ESC shares a number of the concerns raised by RSPB and continues to work with them and the Applicant on resolving these where possible.</p>