



## **Appendix B: Summary of East Suffolk Council's Relevant Representation (20026200) Sept 2020**

ESC's Relevant Representation exceeded 1,500 words; a summary has therefore been requested by the ExA for Deadline 1 (D1) which should not exceed 10% of the original text. This summary sets out the key facts of the submission and is representative of the original document, covering key topics and themes, however for a comprehensive list of ESC's discussion points and detail, please refer to the original submission.

East Suffolk Council (ESC / the Council) has long supported the principle of a new nuclear power station at Sizewell, and the existing power stations on the east Suffolk coast – Sizewell A (decommissioning stage) and Sizewell B (operational). ESC recognises that as well as being an important contributor to the national energy strategy, Sizewell C has the potential to bring additional benefits to east Suffolk regarding jobs, skills and potential legacy benefits in these areas and others by encouraging appropriate mitigation in relation to the project.

ESC takes a neutral approach to the Sizewell C proposal, neither fully supportive nor against the proposals. There are too many outstanding issues at this stage to enable us to commit further. By highlighting these issues, we aim for SZC Co. to seek to address them, if possible, through the remainder of the DCO process.

In September 2020, ESC provided general comments under specific topic areas used in SZC Co. documents as well as site specific comments, a combined summary of ESC's position on these areas is provided below:

### **Noise**

- There are several significant adverse impacts from noise predicted to noise sensitive receptors from various elements of the proposals along with a level of uncertainty in the assessment that will need to be considered further. A flexible and comprehensive scheme of ongoing assessment, monitoring and mitigation is likely to be essential to minimising the noise impact and we will be seeking assurances to this effect.
- It is anticipated that we will now be discussing several areas at length with a view to securing further clarification and/or changes to the approach in some areas. However, it is likely that a project of this scale and magnitude will have noise impacts that will not be able to be reasonably addressed and those impacts will be present at varying degrees over the life of the project, and this will need to be considered further

### **Environmental Impacts – Contaminated Land**

- In terms of contaminated land SZC Co. are using the correct procedures as outlined by the relevant guidance (CLR:11 and GPLC). There is a commitment to continue this compliance, but it will need to be included in the relevant documents and clearly so, be that in the Materials Management Plan or Spoil Management Plan, although we would suggest due to the wide range of this project, they should also undertake to produce a Contamination Management Plan so that there is not confusion with other Plans / responsibilities.

### **Lighting**

- Lighting is an area that has the potential to significantly impact with regards to nuisance, ecology, tranquillity, and dark skies. The lighting documents put a strong emphasis on the prevention of nuisance; the dynamic

nature of construction and the need for lighting has been accepted and they have stated that there will be provision for monitoring.

### **Landscape and Visual Impact (LVIA)**

- Despite embedded mitigation to minimise effects during operation, significant adverse effects will remain for the existing landscape character of the area (Estate Sandlands, Coastal Levels LCTs). Significant adverse effects on visual amenity have been identified for views at Westleton Walks and Dunwich Heath, RSPB Minsmere, Coastal strip between Dunwich, Minsmere Sluice and Beach View holiday park, Eastbridge and Leiston Abbey, Sizewell Belts, views from NT Dunwich Heath Coastguard Cottages, views from offshore and the Suffolk Coast Path and Sandlings Walk.
- It is claimed that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during operation on these designations are therefore assessed as not significant. The Council does not agree with this. As construction activity winds down, so landscape restoration will commence. Provided that the anticipated intention to return the EDF Energy Sizewell estate to what is substantially acid grassland and lowland heath, plus woodland and hedgerow, then that must be regarded as a notable enhancement of the AONB landscape, although it will take many years before it is fully realised.

### **Ecology**

- There are many Important Ecological Features (IEFs) where the ES conclusion after mitigation is that there will be Minor Adverse, Not Significant impact. However, it is unclear whether the sum of all these impacts has been considered or how they will be mitigated/compensated.
- Insufficient weight is being given to Suffolk Priority Habitats and Species, further effort in identifying suitable mitigation, monitoring and enhancement for these species is required.

ESC identifies several outstanding issues in our detailed RR in relation to ecological matters.

### **Air Quality**

- The construction mitigation measures within the draft CoCP and Dust Management Plan allow for monitoring associated with specific activities.
- There are ecological receptor locations which are estimated to receive an increase of 1% or more in nutrient nitrogen deposition. SZC Co. has provided a clarification note which explains apparent discrepancies between the tabulated model results (Appendix 12B Tables 1.27 – 1.29) and their interpretation in paragraph 12.6.73.
- It is mentioned that emissions from train engine idling have been represented within the dispersion modelling exercise, however further information is required to confirm whether a reasonably conservative assessment has been undertaken.
- The outline CoCP should commit the contractors to using stage V compliant NRMM.
- Euro VI emission standard should be specified for all tiers of construction contractors' HGVs in the Outline CoCP.

### **Heritage**

- We support the view that all identified harm is to be treated thus, regardless of its magnitude. It would have been more helpful, however, for the ascribed magnitudes to be aligned in their effects with the National Planning Policy Framework (NPPF) terminology of substantial and less-than-substantial harm. Further detail given in the main RR document.

### **Socio-Economic Impacts – Communities**

- There are multiple communities living within close proximity to the Main Development Site and Associated Development sites across East Suffolk. Other communities will be impacted by the Sizewell C proposal by virtue of sharing and using the same highway network during the construction phase. Also, by using recreational facilities close to the development site including coastal paths, local public rights of way etc. Once operational, the primary impacts of the development on communities will be predominantly in Leiston.
- Community Safety is a key issue across the construction of the project. We are working closely with colleagues in Suffolk Constabulary and SCC 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).

### **Accommodation Strategy**

- ESC supports the building of an accommodation campus to house 2400 workers adjacent to the Main Development Site and is supportive of proposals for a workers' caravan site with 400 pitches, housing up to 600 workers on LEEIE. However, we need to be reassured by SZC Co. that the caravan site at the LEEIE will be available prior to work commencing on the Main Development Site and that the accommodation campus will be available, preferably on a phased basis as constructed before peak levels of construction workers are on the site.

### **Skills, Education and Employment**

- We welcome the importance that the proposals place on capitalising upon the real potential for the development to create a positive long-lasting legacy for skills and employment in the region. We are supportive of the aspirations, including those to maximise local employment, and the commitments and investments outlined as well as the intention to integrate with regional strategy and initiatives. If the detail on the strength, scope and governance of these commitments is forthcoming, and at the level which we deem necessary, the development will undoubtedly provide many benefits for the local area.

### **Economic Development**

- This Council supports the benefits to the local economy that are achievable from the Sizewell C project, the £100m a year GVA uplift during construction and the £40m a year GVA uplift for each year of operation, has the potential to significantly improve the local economy. If this is combined with appropriate skills and education interventions, we can maximise the opportunities for our region arising from the Sizewell C project. By working with SZC Co. on expanding our existing projects and aspirations, we can seek to avoid the potential for a boom then bust scenario which is common when development is focused on a single large-scale project. By combining our efforts with legacy potential with regards to other large-scale projects including road building, flood barrier construction and offshore windfarm proposals, we can maximise the legacy from the economic investment of each project in East Suffolk.

### **Tourism**

- SZC Co. needs to provide further detail and assessment on the tourism impact, through tourism surveys, to inform opportunities and mitigation measures for tourism: Separate tourism surveys carried out by SZC Co. and the Suffolk Coast Destination Management Organisation (DMO) in 2019 both show a negative perception impact on willingness to visit Suffolk if the development goes ahead.
- To compensate for this likely impact, SZC Co. propose a Tourism Fund which has been agreed in principle to help mitigate negative impacts. We support this but require further agreement in relation to the principles and robustness of the Fund.
- ESC supports the provision of a Visitor Centre to serve both Sizewell B and Sizewell C as being a positive visitor destination initiative in East Suffolk, and we expect to be involved in future submissions in relation to design detailing of the facility.

## Transport Strategy Impacts

- SZC Co. in their DCO propose what they call the 'Integrated Strategy' for transport – it is a combination of road and rail, there is a small element of sea-based transport using a beach landing facility. It is our understanding that the majority of the 3 rail paths (6 rail movements) will be over-night during peak construction. The beach landing facility will be predominantly used Spring – Autumn and not during the winter months. We want to work with SZC Co. to maximise the use of rail and sea and avoid an unacceptable impact on residents.
- The Council is disappointed that opportunities appear to have been missed over the last ten years of preparation for this DCO by SZC Co. and Network Rail to work together to enable improvements to the wider east Suffolk rail network which could have delivered a rail-led strategy resulting in a minimum of 5 rail paths a day (10 rail movements) with minimum over-night.
- We support the permanent retention of the Sizewell Link Road and promote the aspiration for SZC Co. to provide funding and investment for the B1122 to be downgraded in status and capacity and for it to become a cycle friendly route from Darsham Station / A12 in to the AONB/Heritage Coast as a boost to the tourism offer.
- We always have been and remain supportive of a rail-led approach, but we would prefer most of the rail movements to take place during the day complete with dualling of the track to avoid disruption to passenger services. We need more detail and clarification about timing of rail movements overnight so we can assess potential impacts about noise and vibration.

ESC also provided site specific comments, a summary of our position is provided below:

### Main Development Site

The Main Development Site will have far-ranging impacts that are discussed in some detail in the RR but will be elaborated and further explained in the Council's Local Impact Report which will be written with Suffolk County Council. Key areas of the Main Development Site to mention in this summary:

- Turbine halls / Operational Service Centre (OSC): ESC can support the design and location of the turbine halls / OSC subject to appropriate design detailing and use of materials.
- Accommodation Campus: The Council support the principle and location of the campus.
- Pylons: ESC reluctantly accepts that the SZC Co. solution of four pylons, two at 48 metres and 2 at 65 metres would be the least worst option, however, this will adversely impact on the landscape and therefore we expect appropriate compensation within the proposed AONB Fund to compensate this approach.

### Land east of Eastlands Industrial Estate (LEEIE)

- The Council supports use of the LEEIE but there are design and layout details that will need to be resolved.

### Sizewell Link Road / Yoxford Roundabout

- The Council supports the principle of the Sizewell Link Road as taking HGV movements from the majority of the B1122. However, there are adverse impacts arising from the design of the road that will need to be addressed by the applicant.

### Two Village Bypass

- The Council supports the principle of the two-village bypass but includes reference to specific mitigation that will be required – embedded and external to minimise adverse effects on people and property including heritage assets.

#### **Northern Park and Ride**

- The Council supports the location of the northern park and ride. There are details in relation to the design that will need addressing but we are confident that these can be covered predominantly with requirements.

#### **Southern Park and Ride**

- The Council supports the principle of the southern park and ride in this location and the access to and from.

#### **Freight Management Facility**

- The Council supports the principle of a freight management facility, although we have some reservations with regards to its location adjacent the Seven Hills junction of the A14 with the A12 – we consider there to be potential issues with additional HGVs on this roundabout particularly at peak times.

#### **Green Rail Route**

- ESC supports the green rail route proposal for direct rail access into the Main Development Site as this takes over-night rail movements from the centre of Leiston. However, there are still likely to be noise implications in relation to over-night rail movements that will need to be addressed. In principle, we support the green rail route as a temporary measure during construction. We would seek its removal and reinstatement post-construction as soon as practical.

#### **Combined Impacts on Communities**

- There may be in-combination effects on the labour market arising from other energy projects in the vicinity in the same timeframe – ScottishPower Renewables East Anglia One North and East Anglia Two as an example.

#### **Other**

ESC's RR includes reference to project wide, cumulative, and transboundary effects. It also contains reference to monitoring, mitigation, and compensation requirements.

Original RR: 44,000 words

Summary: under 2500 words (less than 10%)