

The Sizewell C Project, Ref. EN010012

**Executive Summary of Suffolk County Council's
Relevant Representation [[RR-1174](#)] in respect of
the proposals for the Sizewell C Nuclear Power
Station**

Originally submitted on 28 September 2020

Suffolk County Council Registration ID Number: 20026012

Submitted at Deadline 1 (12 May 2021)

Please note that this is a summary the Relevant Representation as submitted on 28 September 2020 and represents Suffolk County Council's views at that point in time. Therefore, it does not take into account the change application by the Applicant which has been accepted by the ExA on 21 April 2021, or any other information that has come forward since.

EXECUTIVE SUMMARY (as of 28 September 2020)

1. Suffolk County Council (the Council) has always supported the principle of a new nuclear power station at Sizewell, recognising that Sizewell C would be an important contribution to the national energy strategy and welcoming the benefits such a development would bring to Suffolk, regarding jobs, skills and legacy.
2. However, whilst the Council has always supported a new nuclear power station at Sizewell in principle, it cannot support the current proposals as submitted by the applicant in its Development Consent Order (DCO) application.
3. The Council does not consider the DCO proposals sufficiently avoid, minimise, mitigate, or compensate for the impacts it will have on the communities and environment of Suffolk. To be acceptable and to make the development work for Suffolk, it is essential that these impacts are minimised, by following the mitigation hierarchy (avoid – minimise - mitigate – compensate), prioritising sustainable transport modes and by addressing the sensitivity of its location and any community impacts arising.
4. The Council sets out in this Relevant Representation the areas where the Council has significant concerns that remain unresolved. The impacts of the proposals submitted by the applicant will be further expanded on in the Council's Local Impact Report which will be submitted separately at a later stage. The Council will provide further amplification and detail of its concerns, where appropriate, in the its Written Representations.
5. The Council does not support the applicant's proposed freight transport strategy as it stands, due to the fact that (1) it is not a sustainable strategy, because an increased proportion of rail transport (and potentially sea-borne transport) could be reasonably achievable, and (2) it does not currently mitigate its transport impacts on the highway network to acceptable levels for the community. The Council asks the Examining Authority to consider the proposals against national policies promoting sustainable transport solutions. The Council is not content that the Sizewell C proposals have not replicated the much greater use of sea transport which occurred at Hinkley Point C and is proposed for Bradwell B. Given the minimal use of sea transport, the Council is particularly disappointed that opportunities have not been taken up by the applicant to pursue an upgrade of the East Suffolk Line which would allow for a greater percentage of materials to be delivered to site by rail. The Council considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries at this point.
6. In the event that the Examining Authority considers the applicant's transport strategy as it stands today as an acceptable approach, the Council as the Local Highway Authority would seek additional assurances from the applicant, in order to secure the maximum possible rail and sea usage, robust transport controls and monitoring arrangements, and additional mitigation to address

junction and road capacity issues, increased carbon footprint and emissions and community impacts.

7. Notwithstanding the Council not supporting the applicant's freight transport strategy, the Council has instructed its officers to seek to resolve the following (non-exhaustive list of) key concerns, in advance of and during the examination:
- i) Maximising the tonnage of freight to be delivered by rail and sea;
 - ii) Securing controls for all Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs), and robust transport management plans and monitoring arrangements of all Sizewell C traffic;
 - iii) Additional highway improvements required to ensure continued sustainable and safe movement of people and materials and improving road capacity (locations where additional improvements are sought are listed in paragraph 33 below);
 - iv) Aspirational travel plan measures and associated appropriate improvements in sustainable transport infrastructure so that construction workers use sustainable modes of transport rather than cars to reach the main development site and Park and Ride sites;
 - v) Designing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction;
 - vi) Removing the proposed pylons for electricity export connection on the main development site, by utilising alternative means to connect to the grid;
 - vii) Replacing the proposed causeway to cross the Sizewell Marshes Site of Special Scientific Interest (SSSI) with a three-span bridge design, to reduce its ecological impact;
 - viii) Providing comprehensive mitigation for a range of species, including bats and water voles;
 - ix) Providing robust contingency strategies for fen meadow and wet woodland mitigation;
 - x) Improving ecological connectivity to Aldhurst Farm;
 - xi) Removing the outage car park from its proposed location within the Suffolk Coast and Heath Area of Natural Beauty (AONB), by either co-locating it with Sizewell B outage car park or replacing it with a Park and Ride solution;
 - xii) A comprehensive coastal change Monitoring and Mitigation Plan (MMP), with an allocated mitigation/compensation budget, that allows determining if and to what extent an observed coastal change in the Sizewell C zone of influence is attributable to the development, and appropriate and required mitigation measures;
 - xiii) Provision for the cost of full removal of the hard sea defence as part of the decommissioning process unless and until a future study changes this position;

- xiv) Acceptable realignment of the coastal footpath, as well as a safe and suitable diversion route during its closure for the construction of the development and for the operation of the Beach Landing Facility;
 - xv) Introducing appropriate mitigation packages for transport related community impacts (including noise and vibration from road and rail transport, at day and night-time, and mitigating the economic cost of congestion);
 - xvi) Acceptable proposals for potable water supply;
 - xvii) Acceptable and sustainable drainage solutions for the Main Development Site, Land East of Eastlands Industrial Estate and the Associated Development Sites;
 - xviii) An acceptable solution to mitigate the impact on the Leiston Household Waste Recycling Centre at Lovers Lane;
 - xix) Securing the necessary archaeological work, by providing a suitably detailed overarching written scheme of investigation and binding commitments;
 - xx) Comprehensive monitoring arrangements in all areas, but particularly for natural environment and transport impacts, with appropriate attached contingency funding for unforeseen impacts identified by monitoring/review groups.
8. Noting that the applicant proposes funds to mitigate and compensate its impacts, to make these acceptable to the Council, each of these need to be of reasonable size and scope, and have clear criteria and robust governance. The Council will raise its proposals on the hosting of and the governance for and between these funds separately with the applicant. The funds to be considered include:
- i) A natural environment fund (for both the construction period and whole lifetime of the power station including decommissioning – to deal with impacts on ecology and on AONB special qualities and characteristics – which needs to be wider than the proposed AONB Fund);
 - ii) Community Fund;
 - iii) Tourism Fund;
 - iv) Skills, aspiration and employment investment package;
 - v) Housing Fund;
 - vi) Funding package to mitigate health and community safety impacts;
 - vii) Public Services Resilience Fund;
 - viii) Costed mitigation package for Leiston and Wickham Market, acceptable to the Town/Parish Council, with legal assurance from the applicant to cover possible cost overruns;
 - ix) Contributions towards increased highway maintenance costs resulting from construction traffic using the A12, B1122 and other local roads. This includes additional costs to undertake maintenance at night or

advance of construction to avoid disruption and structural damage to local highways;

- x) Public Rights of Way and cycling package;
 - xi) Suitable levels of funding for Council officers to manage controls and mitigations, discharge requirements and engage with the applicant, including funding of the Transport Review Group and other management groups.
9. The County Council expects that it will take the lead in discharging requirements related to its relevant statutory functions, specifically highways (including Public Rights of Way), drainage and surface water, and archaeology. The Council accepts that East Suffolk Council is the appropriate discharging authority for all other matters but asks that a formal requirement is put in place that the County Council be fully consulted on these matters before any requirement is discharged. The County Council expects to reciprocate this arrangement for the activities where it has functional responsibility.
10. It is disappointing that several gaps in the evidence base presented by the applicant remain, despite the Council and other stakeholders requesting specific additional information at every stage of pre-submission consultation. The submission leaves evidence gaps in, for example, assessing impacts and mitigation requirements for the natural environment, or for the removal of the marine and rail options during the consultation period. The Council is also concerned about the silo approach taken in the Environmental Statement, in that individual impacts are considered but, in many cases, the overall combined impact is not. As such, it is difficult for the Council to conclude, in some topic areas, whether the proposals can be considered appropriate.
11. As noted above, the Council recognises the wider contribution that a new nuclear power station would make to the national energy strategy and the Council would welcome the benefits to Suffolk in terms of jobs, skills, and legacy. That contribution and those benefits would be capable of being delivered by the current proposals, but in the Council's view that would also be the case for a modified proposal that satisfactorily addressed the concerns outlined above. Consequently, the Council is not persuaded that the positive elements of the current proposals as they stand today are sufficient to outweigh or over-ride the negative factors that have been identified by the Council. Those positive elements would not be lost if the proposals were revised to address the Council's concerns.