

**The Sizewell C Project, Ref. EN010012**

## **Executive Summary of Suffolk County Council's Written Representation**

**Suffolk County Council Registration ID Number: 20026012**

**Deadline 2**

**2 June 2021**

### **Purpose of the Written Representation**

1. The Local Impact Report (LIR) [REP1-045] sets out the two local authorities' detailed assessment of the DCO application (including the proposed changes). This Written Representation, prepared by Suffolk County Council (hereafter referred to as 'SCC'), should be seen as supplementary to the LIR, and elaborates upon and sets out further evidence and background to a number of important topic areas: The transport strategy (including the evolution of rail and sea proposals, and for the Two Village Bypass and Sizewell Link Road an overview of the evolution of the schemes and SCC's stance on them, and the matters that still need to be addressed to make the transport strategy acceptable to SCC), the rationale for and practicalities of removing the Sizewell Link Road, and further evidence and an elaborated rationale for SCC's request for alternative solutions to on-site pylons and overhead lines, and to the proposed outage car park at Goose Hill.
2. SCC hopes that this additional detail is helpful for the Examining Authority to better understand SCC's, and the community's, concerns and related evidence on these matters, and the reasons why certain, in SCC's view better, alternatives to the Applicant's proposals have not been further pursued at this stage.

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3. The evidence in this Written Representation provides important additional detail to some of what SCC considers as the most important issues for the Sizewell C proposals, namely the transport impacts and the impacts on the Suffolk Coast and Heaths Area of Natural Beauty (AONB).

4. Regarding the Transport Strategy, it is noted that, during the pre-submission consultations, the Applicant moved gradually away from sustainable, i.e. rail and sea based, means to transport materials to site. Only with the recently accepted change application to the DCO proposals has the Applicant returned to strategies which prioritise rail and sea. Whilst opportunities for better rail solutions have been missed, and there are still questions around deliverability, timing and suitability of mitigation measures, SCC strongly supports the principle of the proposals to increase rail and sea deliveries.
5. The Written Representation sets out the evolution of proposals for the Two Village Bypass and Sizewell Link Road, and notes that opportunities for better solutions have been missed.
6. Whilst SCC sees the Two Village Bypass as essential minimum mitigation for the Sizewell C development that also has legacy benefit and considers that it is not proportionate for the Applicant to fund a longer bypass than the proposed Two Village Bypass, we consider it unfortunate that an opportunity to develop a full four village bypass (known as the “Suffolk Energy Gateway”) could not be realised, as funding from the Department for Transport could not be secured.
7. For the Sizewell Link Road, it is noted that this is essential mitigation for local communities during the construction phase of Sizewell C. However, as the proposed routeing is in parallel to an existing road, the B1122, which is adequate for operational traffic, SCC considers that the road has too limited legacy value to justify its retention post-construction. We note that alternative routes that had been assessed but were dismissed by the Applicant could have had considerably more legacy value and would have had additional benefits during the construction period, in terms of reduced distances for HGVs to travel.
8. That part of the Written Representation is concluded with an overview of the matters that need to be addressed by the Applicant in full, for SCC to review whether the (with the change application revised) transport strategy is considered acceptable.
9. In the second part of the Written Representation, SCC sets out further evidence to explain the rationale for SCC’s view that the Sizewell Link Road should be removed after completion of the construction of Sizewell C, and why it considers such a removal is practical and desirable.
10. The third part of the Written Representation provides further detail on SCC’s requested changes to the proposals that could reduce the impact on the AONB, assessing these against policy tests whether there is an overriding need for the developments to take place within the AONB.
11. The Applicant proposes new overhead lines and pylons on the main development site, which would be visually prominent and adversely impact the AONB, and SCC provides in the Written Representation and its Appendices 4a-d evidence that, in the

view of SCC's expert consultants, pylons and overhead lines could be avoided if a different technology, of Gas Insulated Lines, was applied. SCC is not convinced by the Applicant's evidence that Gas Insulated Lines could not be accommodated on the site.

12. The Written Representation also provides a more detailed rationale and policy assessment why, in SCC's view, the proposed outage car park at Goose Hill in the AONB does not constitute an overriding need for this additional development within the AONB, and sets out alternatives which involve shared outage car park arrangements with Sizewell B, and off-site "park and ride" solutions for those rare occasions where multiple outages occur in parallel.
13. The inclusion of pylons and overhead lines would significantly exacerbate the residual impacts on the character and special qualities of the AONB, and the additional AONB land take of the outage car park would further add to the impact. The priority, according the mitigation hierarchy, has to be to avoid and reduce the impact. If this avoidance or reduction is not considered possible, then the compensation of this additional residual impact needs to reflect this increased impact.
14. With regard to the SSSI crossing, the Written Representation reiterates that there is an alternative to the proposed SSSI causeway crossing which would result in less land take and reduced ecological impact.