



# The Sizewell C Project

## 9.26 Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021

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## 1 INTRODUCTION

### 1.1 Overview

1.1.1 The Open Floor Hearings were attended by Carly Vince (Chief Planning Officer), Richard Bull (Transport and Associated Development Lead) and Tom McGarry (Head of Communications) on behalf of the Applicant, SZC Co. An overview of the Applicant's oral submissions is provided in **SZC Co.'s Summary of Oral Submissions at the Open Floor Hearings** (Doc Ref. 9.25). At these hearings Carly Vince committed to provide the following documents at Deadline 2, which are provided in this document in Sections 2-8:

- A note on the chronology and current position in respect of rail infrastructure at Campsea Ashe, which was offered by the Applicant on 18 May 2021 (evening session). Refer to Section 2 of this document for details.
- A note responding to concerns raised by landowners as to lack of meaningful engagement and negotiations in relation to compulsory acquisition and temporary possession of their land, which was requested by the Examining Authority on 19 May 2021 (evening session). Refer to Section 3 of this document for details.
- A note on lessons learnt from the Hinkley Point C Project in relation to impacts on the local housing market, which was offered by the Applicant on 18 May 2021 (evening session). Refer to Section 4 of this document for details.
- A note providing an overview of temporary changes to HGV limits in the early years in connection with Hinkley Point C Project, arising from oral submissions during the open floor hearings. Refer to Section 5 of this document for details.
- A copy of a report by Atkins referred to by Mr Scott in his oral submissions on 19 May 2021 (afternoon session), which was requested by the Examining Authority in that same session. Refer to Section 6 of this document for details.
- A copy of the Layfield Report referred in oral submissions on 20 May 2021 (afternoon session), which was requested by the Examining Authority in that same session. Refer to Section 7 of this document for details.

- A note on the approach taken to the felling of Coronation Wood, in accordance with the planning permission (ref) and the necessary ecological licences. Refer to Section 8 of this document for details.

## 2 SUMMARY OF ENGAGEMENT WITH NETWORK RAIL AND THE CONSIDERATION OF A PASSING LOOP ON THE EAST SUFFOLK LINE

- 2.1.1 SZC. Co has been in discussion with Network Rail since 2011 in relation to the necessary work and agreements required to enable the Sizewell C Project to be served by rail for the delivery of construction materials. A brief timeline is set out below.
- 2.1.2 In the period 2011-2016, SZC Co. and Network Rail worked together to establish rail freight principles for the Project which were the subject of Stage 1 and Stage 2 consultation in November 2012 and November 2016 respectively. SZC Co. and Network Rail signed a Basic Services Agreement in November 2015 to review a rail freight pre-feasibility study.
- 2.1.3 July 2016: A Development Services Agreement was signed by the Parties to complete GRIP 1 and undertake GRIP 2 feasibility work.
- 2.1.4 June 2017: Network Rail completed a GRIP 2 feasibility study to establish the viability in providing the train paths, and the associated infrastructure works required to operate freight trains along the East Suffolk line and Leiston branch line. The work considered two scenarios:
- a) operating 2 tpd overnight, outside of the passenger service, operating within the existing track capability and regulations
- 2.1.5 The report concluded, at that stage of project maturity, that it was considered feasible to provide 2 trains per day (tpd) from Ipswich to Sizewell overnight. A risk assessment workshop established that the level crossings on the Leiston branch line at Bratts Black House, Leiston and Sizewell would need improvements. The operational procedures would need to be approved to accommodate two trains on the SIZ line (the Saxmundham to Sizewell branch line). The 2tpd operation would have an impact on the current maintenance regime and the future Engineering Access Statement and Rules of the Route, which needs further exploration during GRIP 3.
- 2.1.6 July-December 2017: Following the work completed at GRIP 2, SZC Co. confirmed that two freight strategy options would be consulted on at the Stage 3 consultation:

- Road-led strategy – based on 2tpd operating overnight on the East Suffolk line. This would include proposals on the Leiston branch line but not on the East Suffolk line.
- Rail-led strategy – based on 5tpd operating during the day. This would include proposals for a passing loop on the East Suffolk line and the required interventions at level crossings to reduce safety risks.

**2.1.7** During this period engagement took place between the parties on the level crossing upgrades or closures required for the East Suffolk line. The impact of the speed increase to facilitate the rail-led strategy was to raise the risk categorisation which would require an intervention at 45 of the of 47 level crossings along the East Suffolk line. Network Rail and SZC Co. worked closely with the Local Authorities on the required upgrades or potential level crossing closures with PRow diversions. The output of this work was required to be presented in the Stage 3 consultation to support the rail-led strategy option.

**2.1.8** May 2018: Network Rail issued level crossing reports detailing designs for the agreed proposed upgrades for 33 level crossings on the East Suffolk line including any temporary or permanent land requirements. It was agreed to propose 12 level crossing closures with options for the PRow diversions. This detail formed the basis of the level crossing proposals presented at Stage 3 consultation.

**2.1.9** January 2019: Stage 3 consultation including road-led and rail-led alternative proposals. Within the response to the consultation Network Rail stated:

*“as noted in the consultation documents Network Rail has identified a number of risks to the rail-led solution that could potentially impact the programme in terms of the submission date for the DCO. Therefore, EDF and Network Rail recognise that this could affect their decision as to which strategy to pursue. We continue to work closely with EDF to understand the necessary timescales and impact on the programme.”*

**2.1.10** June 2019: Additional work was undertaken by Network Rail to confirm that capacity was available on the East Suffolk line, in particular with regard to Westerfield Junction and existing rail traffic from Felixstowe. The GRIP 2+ Report concluded:

- The road-led option requires running services overnight on the East Suffolk main line, but provision of two parking spaces on the Sizewell

branch would allow for services to avoid running through Leiston at unsociable hours. There is sufficient capacity to run all 4 paths overnight with 3 hours of capacity to spare, but the existing Down direction freight path can be used instead of one overnight path to reduce the number of construction trains travelling at unsociable hours.

- The rail-led option was previously analysed by a study in 2016/17 and the change of assumptions presented in this analysis does not impact the ability to accommodate 10 trains per day between Sizewell and Westerfield.

2.1.11 Having established that there was three hours of spare capacity for the road-led strategy, Network Rail were asked to confirm whether it was feasible to operate a third train overnight on the East Suffolk line. The appendix to the GRIP 2+ Report stated that *'to achieve a 3rd train path per day, only the Sizewell C branch line upgrades may be required with no upgrades required on the section of line between Ipswich and Saxmundham. Repurposing of the Nuclear flask path may be required to ensure the 3 trains per day can run to Sizewell C'*.

2.1.12 The third train path was subsequently incorporated into the integrated freight strategy proposed at Stage 4 consultation.

2.1.13 August 2019: Network Rail issued the GRIP 2+ Report which provided the following outputs:

- An indicative GRIP 3-8 Order of Magnitude estimate for the works.
- An indicative high-level programme for implementation.
- A 'refresh' and re-write of the previous capacity assessment is required for timetable modelling and impact over the 10-year construction period.

2.1.14 The report also summarised the interventions required for the rail-led and road-led options:

b) Road-led

- Provide 14 new signals, 1 new power point, 1 new trap point
- Convert 2 User Worked Crossings (UWCs) to Miniature Stop Lights (MSLs) with detection by the interlocking: Bratts Black House, Snowdens

- Convert 3 TOG crossings to ABCLs: Knodishall, Westhouse, Saxmundham Road
- Convert 2 footpath crossings to MSL and detection by the interlocking: Buckles Wood, Summerhill
- Convert 2 Traincrew Operated Gates (TOGs) to Traincrew Operated Barriers (TOBs): Leiston, Sizewell

**c) Rail-led**

- Re-Signalling main line control to existing signaller's GE Transportation System (GETS) Modular Control System (MCS) workstation and 1 new interlocking
- New passing loop on the East Suffolk line and associated signalling at between existing Uffold User Worked crossing (UWC) and between bridge 432 Loudham Hall and bridge 433 Loudham Lane. Assume no new formation required
- At Saxmundham Junction a new double crossover, double track, new formation and associated signalling on to the Sizewell branch
- 1 new manually controlled barrier with closed circuit television (MCB CCTV) level crossing
- 9 new manually controlled barrier with obstacle detector equipment (MCB OD) level crossings
- 23 new miniature stop lights (MSL) level crossings, 1 with bridleway, 1 with power operated gate openers (POGO)
- Recovery of 10 footpaths

**2.1.15** SZC Co. and Network Rail held a number of discussions and meetings to discuss further the outputs of the study, in particular the deliverability of the rail-led strategy within the required timescales of the SZC programme. Following this engagement SZC Co. made the decision to focus on the proposed upgrades required for the road-led strategy, in particular focussing on additional trains that could be run under this scenario. No further work has since been undertaken on the Campsea Ashe passing loop or the other infrastructure interventions that would have been necessary for the rail-led strategy.

**2.1.16** July 2019: Stage 4 consultation including the integrated freight strategy. This was based on the road-led strategy plus an additional train, and also



including the Green rail route and Sizewell link road. With the response to the consultation Network Rail stated:

*“EDF have commissioned early development work to look at 3 trains per day to support the integrated strategy as described in this stage of the consultation. Very early findings have shown that this may be possible by re-purposing an existing, unused path to Sizewell. This would require work to be done to the Leiston branch line and would also potentially impact level crossings. However, further development work would be required to fully understand the implications of this proposal including whether work on level crossings would need to be progressed through a TWAO. We are currently in discussions with EDF regarding undertaking detailed work to GRIP stage 3.”*

**2.1.17** January 2020: SZC Co and Network Rail agreed a Position Statement as follows:

- *EDF has been working with Network Rail since 2014 on their plans to transport construction materials to the proposed new power station at Sizewell C, and a GRIP 2 feasibility study was submitted in July 2017. This study detailed the required infrastructure upgrades for the East Suffolk line and Leiston branch line to run five freight trains per day to the SZC construction site in each direction. This included a minimum of a new passing loop, track crossover, level crossing upgrades and additional signalling. These upgrades would provide extra rail capacity to allow freight trains to run during the day alongside the existing passenger service.*
- *In 2018, EDF commissioned Network Rail to provide more detailed information on the design and land required for the proposed infrastructure upgrades to inform the next stage of public consultation. The SZC Stage 3 public consultation commenced in January 2019 and two freight options were proposed:*
  - *A road-led option that would involve two freight trains per day in January 20 being held on the branch line before running into Leiston during the day. This option would require upgrades on the Leiston branch, but with no work taking place on the East Suffolk Line.*
  - *A rail-led option approach that would involve five freight trains per day in each direction, operating during the day on the East*

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*Suffolk Line and the Leiston branch respectively. This option would require upgrades on both the Leiston branch and East Suffolk Line.*

- In April 2019, EDF asked Network Rail for a price and programme to further develop, design and deliver (GRIP 3-8) the rail elements required for either of the freight options proposed at the SZC Stage 3 public consultation. This information was provided in June 2019.*
- EDF have been clear that their selected approach must be delivered in time to mitigate impacts of the development without risk of delay, and that the scale, complexity and timescales associated with the upgrades required for the East Suffolk line in the rail-led option pose a significant risk in this respect.*
- The programme of works provided by Network Rail in April 2019 to deliver the infrastructure necessary for the rail-led option proposed further development during the remainder of 2019 and 2020 (GRIP 3) and design work take place in 2021 (GRIP 4). Network Rail would also seek a Transport and Works Act Order in order to make the required changes to level crossings, and as orders of this scale have historically taken around two years to secure, detailed design would only be able to begin in 2023 (GRIP 5), with delivery then running through to 2025 (GRIP 6).*
- These timescales did not align with those that EDF's Sizewell C team are working to, and EDF also maintain a concern that, due to the uncertainty around the Transport and Works Act process, no absolute guarantees on when work would be completed by could be provided.*
- As a result, EDF proposed a new 'integrated' freight option in their Stage 4 consultation in the July 2019, which would see three freight trains per day in each direction. Five of the six required train movements would operate at night with the sixth train movement accommodated by repurposing the existing path currently used by an existing freight service. As with the road-led option, this would only require upgrades on the Leiston branch but would additionally provide a new rail link to the construction site to minimise the period of time for running trains to the railhead in Leiston.*
- EDF are now proposing to undertake the work on the Leiston branch outside the GRIP process, with Network Rail providing a supporting role through its Asset Protection team. These discussions are currently ongoing.*

- *EDF and Network Rail are committed to continuing to work collaboratively in the best interests of the project, the railway, the environment and the local community.*

- 2.1.18 October 2020: A Basic Services Agreement was signed by the parties to allow Network Rail to provide support services in assisting SZC Co. with confirming the requirements for the next proposed design phase for the integrated strategy.
- 2.1.19 November 2020: A Basic Services Agreement was signed by the parties for the Quality Assurance of WSP Technical Notes assessing the technical capacity to operate up to 4 freight trains per day on the East Suffolk line with reference to the rail proposals submitted in the application for development consent.
- 2.1.20 November 2020: SZC Co. consulted on proposed changes to the application for development consent including the potential to increase the number of trains proposed in the integrated strategy from 3 to 4 a day. The potential for a fifth train was mentioned for the very peak of construction, recognising that to achieve this it would have to operate during the day. This would require the cancellation of some passenger services and be subject to engagement with the rail operator and local stakeholders.

### 3 APPROACH TO ENGAGEMENT, INCLUDING TO NEGOTIATIONS RELATING TO COMPULSORY ACQUISITION AND TEMPORARY POSSESSION

- 3.1.1 The approach to SZC Co.'s pre-application consultation is documented in the **Consultation Report** [\[APP-068\]](#) submitted in support of its application for development consent. It details the Applicant's response to each matter raised during formal stages of public consultation, as well as details of the c. 450 meetings that took place outside of the formal consultation stages.
- 3.1.2 The **Consultation Report Addendum** [\[AS-153\]](#) was submitted into the examination in January 2021 in respect of the now accepted changes to the application.
- 3.1.3 SZC Co. has sought to engage with the parish councils in 2021 to support their input into the examination and identify further opportunities to address their concerns. The Sizewell C Project Team based in the High Street in Leiston, has responded to over 450 emails to the project's community email address since 1 January 2021, answering questions from the public and councils/community groups. The team has also received and responded to 137 telephone calls to the Sizewell C helpline in the first three months of this year.

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- 3.1.4 SZC Co. has issued 17 separate project update emails to mailing lists including local government, parish councils, key stakeholder and community groups to inform them about the DCO process, as well as providing additional information such as the recently published annual socio-economic impact report from Hinkley Point C.
- 3.1.5 The parish council emailers consistently included an offer to all parishes for meetings with the Sizewell C Project Team to discuss their community's concerns and inform them about the Sizewell C Project.
- 3.1.6 SZC Co. has met with a number of them through a series of meetings on their relevant representations over the last few months. A list of those met is set out below but, in summary, the Sizewell C Project Team has held 23 meetings with 17 councils/community groups so far in 2021, with further meetings pending. Repeated/follow-up meetings have been held with the parish councils representing the communities closest to the proposed Sizewell C site.
- 3.1.7 These meetings have been complemented by the on-going programme of Traffic and Transport Working Group meetings, chaired by Suffolk County Council, with Leiston-cum-Sizewell Town Council and Wickham Market Parish Council, which also include representation from both East Suffolk and Suffolk County Councils. These group meetings, chaired by Suffolk County Council, were set up in 2019 to discuss possible traffic/transport issues and mitigation for the communities of Leiston-cum-Sizewell and Wickham Market on a monthly basis.
- 3.1.8 Overview of Parish/Town Council (and Community Group) Engagement 2021 - Relevant Representations Meetings:
- Leiston-cum-Sizewell Town Council (TC) - Three meetings already held in 2021, plus further meeting pending
  - Theberton & Eastbridge Parish Council (PC) - Three meetings already held in 2021, plus further meeting pending
  - Middleton-cum-Fordley PC - Two meetings held in 2021
- 3.1.9 One meeting has been held with each of the following:
- Darsham PC
  - Hacheston PC
  - Kelsale-cum-Carlton PC



- Farnham with Stratford St Andrew PC
- Wickham Market PC
- Yoxford PC
- Saxmundham Town Council
- Snape PC
- Aldringham-cum-Thorpe PC
- Marlesford PC
- Pakenham PC
- Nacton PC
- Woodbridge TC
- Community Group: Sizewell Residents Association - Two meetings already held in 2021, plus further meeting pending
- Pending: Melton PC (date still to be agreed)
- Traffic and Transport Working Groups - The first meetings were held in December 2019; with each council having several working group meetings in 2020. These have continued into 2021, with:
  - Leiston-cum-Sizewell Town Council - with five meetings to date in 2021, plus another pending in June.
  - Wickham Market Parish Council - with six meetings to date in 2021, plus another pending in June.

**3.1.10** SZC Co. also prepared initial Statements of Common Ground with those by the Examining Authority. Please refer to the **Statement of Commonality** (Doc Ref. 9.10) for an overview of the status of that engagement.

**3.1.11** Specifically in terms of those with an interest in the land, SZC Co. has been engaging with affected landowners over a number of years, with the objective of securing all land required for the project by agreement. This follows the approach taken at Hinkley Point C where nearly all land was acquired by private treaty negotiations.

- 3.1.12 The proactive efforts to engage with landowners has resulted in some land already being acquired outright (Aldhurst Farm), and other sites secured through Option Agreements (the two park and ride sites). Further, Heads of Terms have been agreed (and signed) with the majority of landowners for the other associated development sites (the freight management facility, two village bypass, Sizewell link road, green rail route and the highway improvement works), as well as the third party owners of land required for the Main Development Site. Out of a total of 50 freehold titles which SZC Co. is seeking to acquire, or secure rights over, 38 titles are either subject to a private treaty agreements or subject to signed Heads of Terms with solicitors now instructed to advance the drafting of Option Agreements.
- 3.1.13 The signing of Heads of Terms by the majority of landowners has only been made possible following extensive and meaningful discussions with landowners affected by the scheme and their representatives. SZC Co. has supported and engaged with the '*Land Interest Group*' ('LIG'), a body consisting of land agents and solicitors acting for affected landowners, and the NFU, to advance negotiations for the land and rights required for the project, and discuss detailed matters related to the interface between the project and landholdings, before, during and post construction. SZC Co. has underwritten the costs of agents and solicitors engaging in negotiations on behalf of their (landowner) clients, to ensure that there were no interim out of pocket costs suffered by the landowners.
- 3.1.14 SZC Co. has provided specialist support on technical matters, making available the relevant disciplines to engage on technical engineering, environmental or other matters. SZC Co. has also procured a specialist drainage consultant that has engaged with affected landowners to understand existing drainage and irrigation infrastructure, and to work with landowners to agree a suitable drainage/irrigation solution for the reinstatement of land post construction.
- 3.1.15 Given the progress to date, and the on-going efforts from SZC Co.'s Land Team and retained agents, it is the expectation that the considerable majority (if not all) of the land required for the project will be acquired through private treaty by the close of the Examination.
- 3.1.16 This should be read in conjunction with the Applicant's responses to the Examining Authority's first written questions in relation to compulsory acquisition matters.

## 4 LESSONS LEARNT FROM THE HINKLEY POINT C PROJECT IN RELATION TO IMPACTS ON THE LOCAL HOUSING MARKET

### 4.1 Introduction

4.1.1 SZC Co is aware – based on representations made at Open Floor Hearings between 18-21 May 2021 – that there is local concern about the potential effects of the Project on the local housing market, particularly with regard to the scale and location of demand for temporary private-rented housing from NHB workers and the effectiveness of the proposed Housing Fund to mitigate those effects.

4.1.2 This section draws on experience at Hinkley Point C to set out:

- what workforce and housing market effects are being reported at Hinkley Point C (by its Socio-economic Advisory Group)
- how the housing market has responded in Sedgemoor and Taunton and West Somerset, to the Hinkley Point C NHB workforce to-date;
- how effective the Hinkley Point C Housing Fund has been in those areas – in some cases contributing to the change in (b); and
- any lessons learned from Hinkley Point C's experience for the Sizewell C Project.

4.1.3 In summary, evidence for adverse effects on private housing markets in areas around Hinkley Point C shows that any effects have been limited, and the Housing Fund has been extremely effective in delivering additional capacity and resilience to the market. The experience gained has helped to both shape the approach to assessment of potential significant effects, and also the approach to mitigation for Sizewell C.

### 4.2 The Hinkley Point C Workforce and Private Housing Market Effects

#### a) Workforce Monitoring at Hinkley Point C

4.2.1 Hinkley Point C (HPC) undertakes 6-monthly workforce surveys to identify the effects on the private rented sector, providing estimates for workers taking different types of accommodation on a 'ward cluster' basis. This is reported to the Project's Socio-economic Advisory Group (SEAG) and published online at <https://www.sedgemoor.gov.uk/SEAG>.

- 4.2.2 The latest SEAG ‘dashboard’ (January 2021) notes that there are an estimated 4,769 workers of which 36% (3,052) are non-home-based (NHB) (i.e. using accommodation temporarily in the area). Of those, it is estimated that 53% or 1,618 are using private rented sector (PRS) accommodation.
- 4.2.3 This includes accommodation that was already within the PRS before the HPC project was consented, and new rented accommodation that has come to the market (e.g. through new build, change in tenure, or spare rooms and other ‘latent’ accommodation).
- 4.2.4 Hinkley Point C also collects (through the regular workforce survey) information on the type of PRS accommodation workers are using but does not publish this as a regular agreed monitoring requirement to SEAG. This information suggests that, of the PRS-based workers recorded above, around a third are actually in spare rooms or in PRS accommodation that wasn’t on the market at the time of the assessment (as a result of new build or change in tenure).
- 4.2.5 Evidence from Hinkley Point C workforce surveys suggests that the number of workers occupying latent accommodation (mainly spare rooms) is much higher than predicted within the Project’s socio-economic EIA, with (depending on the area) at least 11% and up to 31% of workers reporting that they were staying in the PRS were in spare rooms<sup>1</sup>.

**b) Housing Market Change and ‘Stress Indicators’**

- 4.2.6 Across HPC’s 60-minute study area for NHB workers, the PRS grew by 30% between 2001 and 2011 (an extra 16,000 bedrooms), with particularly strong growth in Bridgwater (80% increase, or 4,200 bedrooms).
- 4.2.7 In the 10 years since the 2011 Census (Office for National Statistics), while local data is not available, national (English Housing Survey<sup>2</sup>) data suggests that the PRS has grown by another 30% - as a result of new development, switch of tenures away from ownership and social rent, and more efficient use of property.
- 4.2.8 In addition to the change in available accommodation, it may be helpful to consider how indicators of housing market ‘stress’ have changed since the inception of the Project, in order to determine if there might be any contributory effects (noting that a causal link can’t be confirmed, due to the scale and differential externalities affecting the housing market).

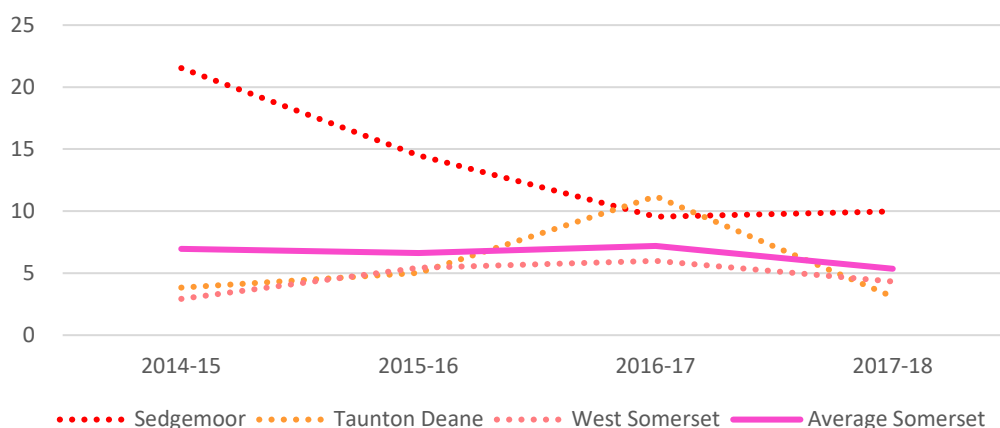
<sup>1</sup> <https://www.sedgemoor.gov.uk/article/4952/HPC-Workforce-Uplift-Topic-Papers->

<sup>2</sup> Ministry of Housing, Communities and Local Government. English Housing Survey (datasets from 2008 to 2018). (Online). Available from: <https://www.gov.uk/government/collections/english-housing-survey> (Accessed 19 July 2019)



- 4.2.9 Rental prices<sup>3</sup> in Sedgemoor have increased slightly more than the national and Somerset average during the construction phase of Hinkley Point C, albeit from a lower starting point. Lower quartile monthly rents for 1-bed properties have increased on average by £50 per month in Sedgemoor, £30 per month in Somerset, and £40 per month in England between 2016/17 and 2019/20.
- 4.2.10 While data suggests that rents have marginally increased in some sectors of the rental market in Sedgemoor, this has not translated into a substantial or sustained increase in housing market stress indicators.
- 4.2.11 Rates of homeless prevention and relief per 100,000 households<sup>4</sup> have substantially reduced in Sedgemoor since 2014/15 and largely remained below the Somerset average in Taunton and West Somerset (See Figure 1);

**Figure 1: Homeless Prevention and Relief per 100,000 Households**

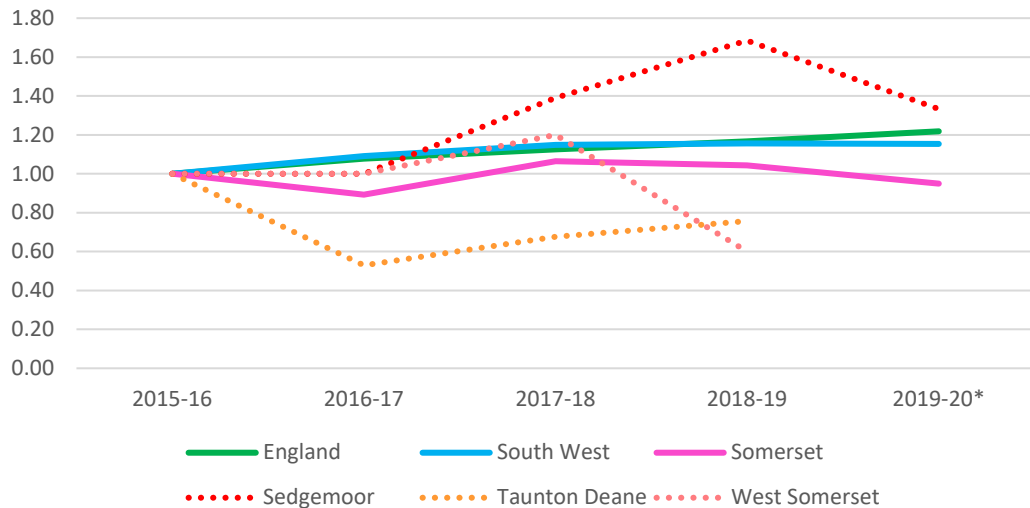


<sup>3</sup> Based on Valuation Office Agency Administrative Database of Private Rental Market Statistics (<https://www.gov.uk/government/collections/private-rental-market-statistics>)

<sup>4</sup> MHCLG Live Table 792: Total reported cases of homelessness prevention and relief by outcome and local authority

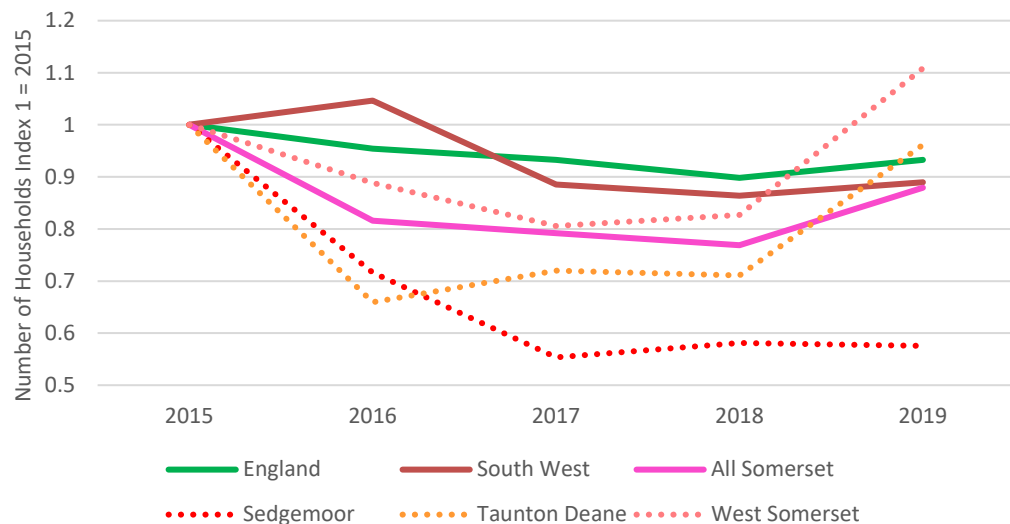
- 4.2.12 The number of households in temporary accommodation increased slightly but returned to close to its starting point by 2019/20 (Figure 2); and

**Figure 2: Indexed Households in Temporary Accommodation**



- 4.2.13 The number of households on waiting lists in Sedgemoor has decreased substantially relative to wider averages (Figure 3).

**Figure 3: Number of Households on Local Authority Waiting Lists, Index Change Between 2015 and 2019**



- 4.2.14 Sedgemoor District Council reported to SEAG as part of the January 2020 SEAG Dashboard that 'There has been a substantial increase in HMOs since 2014'.

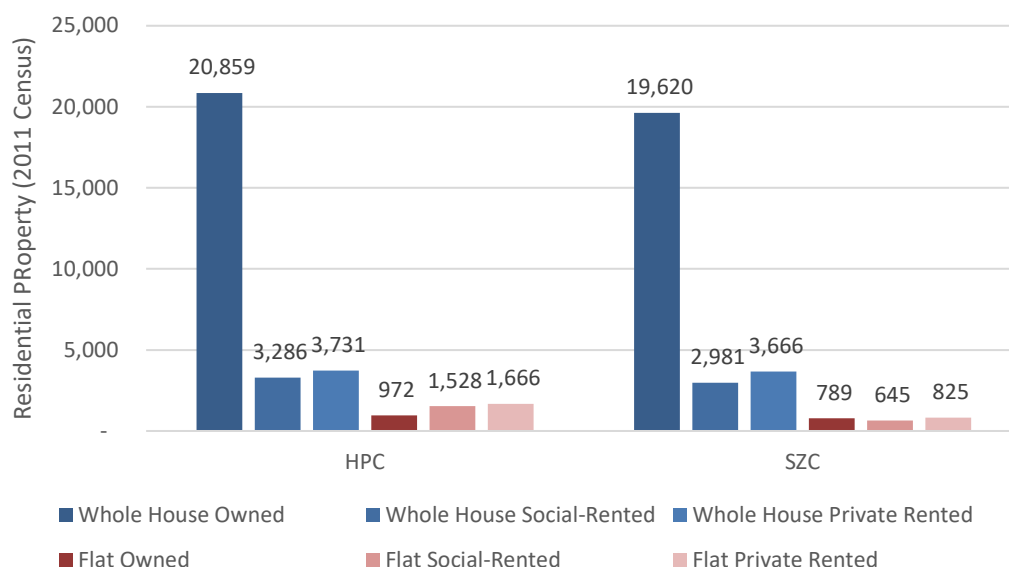
- 4.2.15 A review of the Sedgemoor District Council HMO Licence Register in September 2020 shows 142 active HMO licences across Sedgemoor's 55,000+ dwellings. This data includes the date that licenses were granted – showing that 18 licences were granted in 2020, following 52 in 2019, 45 in 2018, 11 in 2017, 9 in 2016 and 4 in 2014-15. Bridgwater accounts for 83% of Sedgemoor's HMOs.
- 4.2.16 Local authority data returns can be used to benchmark this to the national average – this shows that HMOs represent 0.25% of all dwellings in Sedgemoor, compared with 0.26% of all dwellings in England.
- 4.2.17 While enforcement action against illegal HMOs has not increased, there has been concern from the Councils about the quality of HMOs being brought forward. In response to this concern, NNB Genco agreed to fund a Technical Officer (Housing Standards) in early 2020 using the HPC Housing Fund.

c) **Comparability between HPC and SZC Housing Markets**

- 4.2.18 In developing the assessment of effects on the housing market as a result of Sizewell C's NHB workforce, it has been helpful to consider the similarities and differences in the characteristics of those markets.
- 4.2.19 Workforce monitoring from Hinkley Point C suggests that the NHB workforce is more concentrated than originally assessed through that Project's socio-economic EIA – with the majority of the NHB workforce concentrated within 45 minutes of the site (an area within which Bridgwater is on the edge, with more sparse accommodation closer to the site).
- 4.2.20 Sizewell C's gravity model already takes this into consideration – it has a stronger gravity function than that used for HPC's socio-economic EIA, and reflects the fact that within the 60-minute area, accommodation is more concentrated in areas close to the site (and within 45 mins - such as Leiston, Aldeburgh, Saxmundham, Wickham Market, Woodbridge, Kesgrave, Southwold, Halesworth).
- 4.2.21 A comparison of the 45-minute area where HPC's workforce has concentrated, and the same travel area around Sizewell C, identifies that (based on 2011 Census data):
- There are 32,000 residential properties within 45 mins from Hinkley Point C; and 29,000 within 45 minutes of Sizewell C;
  - Of those properties, the tenure and type profile is very similar – (see Figure 4); and

- LHA rates across the Broad Housing Market Areas are similar and in fact lower in East Suffolk for most size accommodation (LHA rate for a 1-bed property in Sedgemoor is £112 p/w, compared to £113 p/w in East Suffolk).

**Figure 4: Accommodation Tenure and Type within 45-minutes travel time of Hinkley Point C and Sizewell C (2011 Census)**



4.2.22 As a result, SZC Co. consider that there is likely to be a strong ability to replicate the successful Housing Fund approach delivered at HPC within the area of greatest potential significant effect for Sizewell C.

4.2.23 SZC Co. has used this as the basis for engagement with East Suffolk Council to develop an indicative range of measures to avoid significant effects – but also taking account of local expertise and knowledge on the housing market, issues related to housing need and vulnerability.

### 4.3 Housing Fund and Hinkley Housing Initiatives

4.3.1 HPC's Housing Fund has been very effective in providing additional capacity to the housing market around HPC, as has been reported publicly via 6-monthly SEAG dashboards<sup>5</sup>. This sets out that – to date – the Hinkley Point Housing Fund has delivered 2,533 bedspaces (at January 2021). These bedspaces have been delivered at a total cost of around £5.3m (including funding from both the Site Preparation Works S. 106 Agreement,

<sup>5</sup> <https://www.sedgemoor.gov.uk/SEAG>



and the DCO S. 106 Agreement, including a small element of contingency payment).

4.3.2 This represents a substantial increase in accommodation stock – far more than anticipated at the outset, and one and a half times more bedspaces than the total number of workers living in private rented accommodation in January 2021.

4.3.3 These bedspaces have been delivered – to-date – on an average cost of just under £2,100 per bedspace. This is significantly more cost-effective than anticipated when scaling the Housing Fund. The Project's Accommodation Strategy anticipated that a mid-range scenario for the Housing Fund could deliver around 1,000 additional bed spaces by the peak of construction, at a rate of £5,000 per bedspace. So far therefore, the Housing Fund has delivered more than twice the amount of bedspaces, at 42% of the estimated cost per bedspace.

4.3.4 In fact, the local authorities advise that over 3,900 additional bed spaces are anticipated to be delivered by the peak of construction once all of the (£7.5m) Housing Fund (including £4m for Site Preparation works, and another £3.5m for DCO) has been spent, including 1,530 bedspaces in Bridgwater.

4.3.5 The HPC Housing Fund has seen particular success in bringing bedspaces forward quickly and relatively inexpensively through minor improvement grants and loans to home-owners and landlords, to improve the quality of accommodation and bring previously uninhabitable spaces to the market. By the end of March 2019, the local authorities had (between them) delivered over 1,500 bed spaces using this type of initiative.

4.3.6 The HPC Housing Fund also provides: (i) grants and loans for empty homes initiatives, lodging schemes and flexible rent support, as well as enabling schemes to create new, permanent affordable homes and facilitate stalled development; and (ii) funding for initiatives that do not create capacity, but support initiatives that reduce effects or increase the resilience of the wider housing market.

## 4.4 Lessons Learned / Implications for Sizewell C

### a) Developing Assumptions

4.4.1 SZC Co. has drawn on evidence from HPC to ensure that the approach to assessment of effects on the housing market for SZC is reflective of actual impacts observed at HPC, and aims to replicate successful mitigation where practicable and applicable to East Suffolk's housing market.

4.4.2 As such, key assumptions have been developed during the pre-application phase of public consultation, including:

- ensuring that the Gravity Model used to set assumptions for the location of effects is reflective of HPC's observed effects in terms of the strength of gravity and the popularity of certain local markets;
- setting the accommodation assumptions – for example the number of workers likely to choose rented accommodation over tourist sector accommodation – based on feedback from Hinkley Point C;
- identifying a precautionary approach to the assessment of effects – by using a 'worst case' assumption about the proportion of workers likely to be NHB at peak, and by not including assumptions about 'latent accommodation' – which as explained further above, is a popular choice of accommodation for workers at Hinkley Point C and is less likely to cause undue pressure in the housing market.

b) **Developing Sizewell C's Housing Fund using Lessons Learned from HPC**

4.4.3 A number of lessons have been learnt from the experience at HPC that have been brought forward into SZC's approach to managing housing market effects. It should be noted that these lessons have been important in developing the approach to assessment and mitigation, but weight has also been placed on the characteristics of East Suffolk's housing market, and specifically helpful engagement with housing officers from East Suffolk Council, as set out in the **Accommodation Strategy** [\[APP-613\]](#).

4.4.4 The result is an approach to mitigation set out in draft, subject to finalisation within the **Draft Deed of Obligation**.

4.4.5 Key learnings taken forward include:

- that the HPC Housing Fund has been very effective in delivering supply, particularly though minor improvement grants, but requiring a flexible approach to its application and giving the local authorities a broad remit to deliver capacity in their area – this gives confidence that similar approach can be successful at SZC;
- that the HPC Housing Fund has delivered substantially more bedspaces than anticipated, at a far lower cost per bedspace;
- the success at HPC has been driven by the front-loading of delivery – this has been discussed between SZC Co. and East Suffolk Council, with the agreement that the Housing Fund should be used to deliver

measures before the peak of construction, and in a timely manner with a well-governed approach and drawing on monitoring of effectiveness of measures, as well as indicators of housing market stress; and

- the SZC Housing Fund should be split into three parts – to boost supply in the private housing market, to support and enable tourist sector accommodation, and to provide service resilience (for example to manage HMO effects, reduce potential pressure on housing need un-related to the project, and support on-going support for the Councils services). This recognises that the ability to bring forward/boost supply is finite and there may be some benefit in funding measures that prevent homelessness from occurring, thereby reducing additional demand on parts of the PRS that the local authority relies upon to help provide its housing duty (the lower 30th percentile, or Local Housing Allowance (LHA) level, upon which housing benefit is scaled).

## 5 OVERVIEW OF TEMPORARY CHANGES TO HGV LIMITS IN THE EARLY YEARS IN CONNECTION WITH HINKLEY POINT C PROJECT

- 5.1.1 On 13 March 2018 EDF entered into a supplemental Section 106 agreement with the three relevant Somerset local authorities to temporarily increase the permitted number of HGV movements to deliver material to the HPC construction site in advance of the temporary aggregate jetty opening, or the 30th September 2019, whichever one was earlier.
- 5.1.2 The HPC Construction Traffic Management Plan, appended to the HPC Development Consent Order (DCO) Section 106 Agreement, limits the HGV movements to and from the HPC site to an average of 500 movements within a three month period with a maximum of 750 movements in any single day.
- 5.1.3 The HPC DCO Section 106 Agreement provides for the Transport Review Group comprising the three Somerset local authorities, Highways England and representatives of the HPC Project to agree amendments to the Construction Traffic Management Plan, provided that the TRG is reasonably satisfied that the amendments do not give rise to any materially new or different environmental effects in comparison with those assessed in granting the HPC DCO.
- 5.1.4 In January 2018, the Transport Review Group agreed to vary the Construction Traffic Management Plan to permit the average number of HGV movements from 500 to 750 within a 3-month period whilst

maintaining the maximum movements at 750 movements in any single day, subject to the HPC Project entering into the aforementioned supplemental Section 106 Agreement. The 750 movements had been assessed within the Environmental Statement that underpinned the application for development consent. Therefore, the temporary uplift did not give rise to any materially new or different environmental effects in comparison to those assessed in granting the HPC DCO.

**5.1.5** The temporary aggregate jetty became fully operation in September 2019, at which point the pre-existing arrangements within the Construction Traffic Management Plan came back into force, namely an average of 500 movements within a three month period with an maximum of 750 movements in any single day.

**5.1.6** For the six quarters (April-June 2018 to July-September 2019 inclusive) the Transport Review Group Quarterly Report confirmed the following in relation to HGV movements:

**Table 5-1**

Quarter	Average Daily Movements	Maximum Number of HGV Movements
Q2 (April-June) 2018	374	568
Q3 (July-Sept) 2018	356	536
Q4 (Oct-Dec) 2018	354	544
Q1 (Jan-Mar) 2019	366	532
Q2 (April-June) 2019	380	564
Q3 (July-Sept) 2019	238	532

**5.1.7** Given the above information, it is clear that despite having the ability to, the HPC Project did not exceed the original limits set out in the Construction Traffic Management Plan (i.e. an average of 500 movements within a three month period with an maximum of 750 movements in any single day). In fact, the maximum average of HGV movements within a three month period occurred in Q2 2019 when an average of 380 movements took place; and neither has the HPC project needed to utilise the maximum of 750 HGV movements in a single day, with the maximum number of daily movements being 568 in Q2 2018.

**5.1.8** The last Quarterly Report presented to the Transport Review Group covered the period January to March 2021 and confirmed that the average daily movements within the 3-month period was 168 movements and the maximum number of movements was 276 both significantly below the limits set out in the Construction Traffic Management Plan.

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## 6 REFERENCE TO AN ATKINS REPORT

- 6.1.1 As a second of a kind European Pressurised Reactor (EPR™) construction project in the UK, based on the learning from HPC, SZC Co. have set three key delivery principles. These are namely to deliver SZC within an optimised construction schedule, achieve cost savings due to replication strategy and delivered with better quality in a safe manner. As part of the cost savings objective, the target is to achieve an overall cost reduction of 20%.
- 6.1.2 With the three key delivery principles in place, Atkins was awarded a contract in 2019 to develop the concept design focused on enabling works construction (early years) of the SZC main development site. The key objectives of this contract was to demonstrate proof of concept, space-proof key design elements including working space, apply value engineering opportunities, investigate buildability and consider construction methodology. The key output of this contract includes a 3D model of the construction site, a sequence of construction with an associated schedule and a cost estimate for the enabling works programme. The output was used to inform the SZC DCO submission and any subsequent changes. A report which seeks to address the overall cost reduction of 20% of the Project was not part of the intent of this contract. Therefore, there is not a document that the Applicant can submit into the examination.

## 7 REFERENCE TO THE LAYFIELD REPORT AT THE OPEN FLOOR HEARINGS

- 7.1.1 Sir Frank Layfield published his 3,000 page report in 1987 following the completion of the Sizewell B Inquiry. The report is held in the National Archives <https://discovery.nationalarchives.gov.uk/details/r/C7081>
- 7.1.2 During the Sizewell B Inquiry only the designated haulage route from the A12, along the B1122, was considered. No detailed study of alternative routes from the A12 was undertaken.
- 7.1.3 Inspector Sir Frank Layfield noted in his report that the B1122 was very unsatisfactory for large volumes of HGVs and went on to state that Suffolk County Council (SCC) and the Central Electricity Generating Board (CEGB) should undertake a study of alternative routes for a new Sizewell Access Road.
- 7.1.4 A subsequent study in 1988 recommended the 'D2' route, from south of Saxmundham to Leiston as the most favourable option. By this point the construction of Sizewell B had commenced and it was decided that the



construction of a new road on the D2 route could not be justified, as at completion the worst of the Sizewell B construction traffic would be over.

7.1.5 However, in June 1989 the CEGB applied for permission to build a new access road at its own expense in preparation for proposals for Sizewell C. A number of routes were proposed and two local consultation events were held, following which both the CEGB and SCC continued to favour the D2 route. No further work was undertaken after the CEGB abandoned its initial plans for Sizewell C in November 1989

7.1.6 Nuclear Electric was formed in 1990 as part of the privatisation process of the UK Electricity Supply Industry. By 1992 Nuclear Electric was developing plans for a twin reactor Sizewell C development. However, it is clear from the Environmental Statement prepared by the Nuclear Electric at that time that there were no proposals to build D2, although smaller bypasses of Theberton and Middleton were proposed.

7.1.7 When reviewing potential routes for the Sizewell Link Road, SZC Co. considered the route corridors originally looked at in the 1990's including the D2 (SZC Co. Route W). Further information is submitted at Deadline 2 in response to the Examining Authority's first round of written questions.

## 8 CORONATION WOOD

8.1.1 Extensive ecological surveys were undertaken between 2007 and 2020 to ensure decisions in relation to the relocated facilities application were well informed and any felling of the woodland necessary to deliver the development. Suffolk County Council and East Suffolk Council evaluated, challenged, and commented upon the proposals before granting planning permission. The felling of the trees was carried out under planning permission ref. DC/19/1637/FUL.

### a) Bats

8.1.2 The ecological surveys identified multiple trees within the woodland exhibiting features considered to provide suitable roosting opportunities for bats. However, following survey, only a single tree within the woodland was found to support roosting bats; a small non-breeding day bat roost for soprano pipistrelle (*Pipistrellus pygmaeus*).

8.1.3 In England, bats are protected by the Wildlife and Countryside Act (1981) (as amended); the Countryside and Rights of Way Act, 2000; the Natural Environment and Rural Communities Act (NERC, 2006); and by the Conservation of Habitats and Species Regulations (2017). It is an offence to deliberately capture, injure or kill a bat; deliberately disturb in a way that

**NOT PROTECTIVELY MARKED**

would significantly affect their local distribution or abundance, or affect their ability to survive, breed or rear young; intentionally or recklessly disturb or obstruct access to, or damage or destroy a bat roost (this is an ‘absolute’ offence); possess, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat. Accordingly, a derogation licence, issued by Natural England, is necessary to permit the loss of this known roost.

- 8.1.4 The ‘felling of trees’ constitutes one of the “Permitted Preparatory Works” under the planning permission.
- 8.1.5 Permitted Preparatory Works are carved out of all but one of the pre-commencement conditions, meaning that such works were permitted to be carried out prior to approval of pre-commencement details.
- 8.1.6 Condition 27 does not carve out Permitted Preparatory Works meaning that its discharge was required prior to any tree felling works taking place. Condition 27 reads:

*“Mitigation measures associated with additional bat survey work on the site are to be carried out prior to development commencing on site (this includes Permitted Preparatory Works as defined in Informative 1), the details of this is to be agreed in writing with the Local Planning Authority and carried out at an appropriate timescale to be agreed with the Local Planning Authority. Reason: To ensure any adverse impacts on protected bat surveys in the vicinity of the development proposed is appropriately mitigated and managed.”*

- 8.1.7 This condition was discharged by East Suffolk Council in December 2019. The agreed mitigation at the time of discharge of the condition was installation of 11 bat boxes on trees in the vicinity of the woodland to be felled so as to provide enhanced bat roosting suitability within the wider woodland on the EDF Energy estate.
- 8.1.8 Following discharge of condition 27, further bat surveys were undertaken. These surveys confirmed that one tree within the woodland potentially supported roosting bats; a small non-breeding day bat roost for soprano pipistrelle (*Pipistrellus pygmaeus*). In light of this, [NGL] applied to Natural England for a derogation licence on 6th November 2020 to permit the felling of the tree that supports the roost.
- 8.1.9 When the felling of Coronation Wood commenced on 9 December 2000 the derogation licence had not been issued by Natural England. [NGL]

**NOT PROTECTIVELY MARKED**

therefore agreed with Natural England that the relevant tree would not be felled and that it would be protected by establishing and maintaining a 15m buffer around it until the licence had been issued. The derogation licence (Licence Ref No: 2020-50424-EPS-MIT-1) was issued on 8th February 2021 and the tree was felled on 18th February 2021 in accordance with the conditions attached to the licence.

8.1.10 At all times the felling of the woodland was supervised by an ecological clerk of works (ECoW) who undertook a walkover survey, formulated method statements, and briefed all site operatives involved in the felling activities. All works were also carried out in full accordance with *RFS2030 – Coronation Wood Felling Works – Environmental Management Plan prepared by Freedom*.

8.1.11 The ECoW also undertook endoscopic inspections of other trees within the woodland with suitable bat roosting features. Although no bats or signs of bats have ever been identified within these features, SZC Co. has replaced these with artificial roost boxes on retained trees within the wider woodland on the EDF Energy estate.

b) Reptile

8.1.12 Ecological surveys also demonstrated the presence of low numbers of all four of the more common native reptile species (adder *Vipera berus*, grass snake *Natrix natrix helvetica*, slow-worm *Anguis fragilis* and common lizard *Zootoca vivipara*) along the woodland edge. These species of reptiles are protected under the Wildlife and Countryside Act 1981 (as amended); the Countryside and Rights of Way Act 2000 also strengthens their protection. Subsequently, it is an offence to intentionally or recklessly kill, or injure them or sell, offer, advertise, or transport them for sale. Note that it is not possible to obtain a licence for mitigation works associated with these species and it is assumed developers will put in place measures to ensure compliance with this legislation.

8.1.13 A Reptile Mitigation Strategy has been prepared for the site (which supersedes that described within Chapter 6 Terrestrial Ecology and Ornithology of the Sizewell B Relocated Facilities Environmental Statement) and the works have proceeded in accordance with this and under the guidance of an ECoW. Initially in 2019 but again prior to felling, SZC Co. appointed an ECoW to oversee a team handsearching and removing any suitable resting places (such as log piles, etc.) within the woodland and highlight any potentially suitable hibernation locations that are to be safeguarded until Spring. Although no reptiles were discovered during either of these hand searches, SZC Co. also created suitable refuge

piles to the south of the woodland to act as a receptor and provide alternative refuge/hibernation opportunities.