



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 3 – 24 June 2021

Comments by registered Interested Parties on Written
Representations

East Suffolk Council 20026200

East Suffolk Council (ESC) has reviewed a select number of statutory consultees Written Representations submitted at Deadline 2. We did not choose to submit a Written Representation ourselves as we were satisfied that our submitted Local Impact Report [[REP1-045](#)] highlighted all of the representations we wanted to make at that time.

Having reviewed the Written Representation [[REP2-189](#)] submitted by Suffolk County Council (SCC); East Suffolk Council considers it would be helpful for the ExA if we set out clearly East Suffolk Council's current position in five specific areas they have raised:

1. SZC Co. Transport Strategy

- 1.1. The Applicant is promoting a transport strategy for the construction of Sizewell C that relies on rail, sea and road. ESC welcomes the recently accepted change application to the DCO proposals that prioritised rail and sea deliveries to the site [[AS-280](#)]. ESC highlights that opportunities were missed for better rail solutions to be promoted which would have included a passing loop on the East Suffolk line and we do find this disappointing as it would have given a long-term legacy from the project for the rail network (answer to HW1.28 [[REP2-176](#)]).
- 1.2. Specific concerns regarding the deliverability of the rail strategy have been highlighted in the Local Impact Report [[REP1-045](#)] and specific issues with regards to the proposed permanent and temporary beach landing facilities have also been included. Subject to resolving these minor issues, ESC is supportive of the principle of the Applicant's proposals to increase rail and sea deliveries, therefore supportive of the Transport Strategy being proposed provided it can be delivered.
- 1.3. ESC supports the 2 major new road links being proposed as part of the project, the Two Village Bypass and that the Sizewell Link Road, and we accept the routes proposed for both of these bypasses subject to detailing to be resolved during the final design stages.
- 1.4. ESC notes the request of SCC for further enhancement to their highway network, including on the A12 from Seven Hills to the Woods Lane, Melton junction [paragraph 2.30 [REP2-189](#)]. This particular section of improvements is intended to be funded in part from the Department for Transport (DfT) Major Route Network (MRN) funding. ESC is supportive of the delivery of the MRN works as this would improve the highway network to further enable planned growth in the district. Further detail needs to be provided on any measures that would be required in relation to this project should funding from DfT or other funders not be secured, and this has not yet been made completed. We anticipate this further detail being made available to ESC in the next few weeks, prior to being discussed with the Applicant.

2. Sizewell Link Road

- 2.1. The Applicant proposes a new link road from the construction site to the A12 bypassing the villages of Middleton Moor, Theberton and parts of Yoxford. ESC considers a new Link Road necessary to mitigate the impacts of construction traffic on these communities (LIR paragraph 16.70 [[REP1-045](#)]).

- 2.2. ESC considers that the proposed routing makes the Sizewell Link Road acceptable mitigation for the impacts of construction traffic, although note that it brings with it its own negative environmental impacts and that the Applicant has not fully evidenced that the proposed route optimises the outcomes in terms of journey times, distance, and related carbon emissions for deliveries to the construction site (LIR paragraph 16.70 [\[REP1-045\]](#)).
- 2.3. However, ESC, on balance, considers a new link road necessary to mitigate the impacts of construction traffic, notwithstanding the negative environmental impacts arising that ESC expect to be appropriately mitigated.
- 2.4. A retained Sizewell Link Road would provide the opportunity to downgrade the current B1122 to become a quiet road between Middleton Moor and Theberton, used by limited local vehicular traffic with priority given to walking and cycling with appropriate measures to create cycling connectivity to the surrounding area (LIR paragraph 16.97 [\[REP1-045\]](#)). ESC is currently pursuing potential revisions to the existing road layout in order to provide such measures once the Link Road is operational, for these measures to succeed and provide a long-term legacy to residents of Theberton and Middleton Moor, the Sizewell Link Road would have to be retained. There is an outstanding issue in that from Middleton Moor to the Yoxford roundabout, the B1122 is not wide enough to accommodate improved pedestrian and cycling measures safely given it will be shared with HGV traffic from the north on the A12.
- 2.5. However, we note in the consolidated Transport Assessment submitted at D2 [\[REP2-045\]](#) that there is a section (2.5.30) on how cyclists can get from Darsham Station (north on the A12) to Westleton avoiding the B1122, this could prove to be a viable alternative to the problem of the mile to the west of the B1122 and ESC is keen to explore this opportunity further with the Applicant.
- 2.6. ESC is keen to explore opportunities of a downgraded, pedestrian and cycle friendly route, being promoted from the coast heading north towards Darsham Station, providing a family friendly tourist route that does not have to contend with vehicles heading to the power station (LIR paragraph 16.81 [\[REP1-045\]](#)). This could also be seen as a positive permanent benefit in terms of amenity and reduced severance for the villages of Middleton, Middleton Moor and Theberton.
- 2.7. ESC has highlighted previously the ongoing HGV and vehicular movements associated with the Sizewell C power station during operation alongside existing movements to the Sizewell B power station which will continue operating alongside the two reactors at Sizewell C (paragraph 16.72, LIR [\[REP1-045\]](#)). There will be regular outages associated with all three reactors, these outages will be planned to take place for each reactor on an 18-month cycle. The plan will be for these to be staggered so they are approximately six months apart (paragraph 29.52, LIR [\[REP1-045\]](#)). However, there is always the possibility of planned or forced outages which could mean that two reactors are an outage at the same time.
- 2.8. Each outage lasts for approximately three months and usually has around 1000 additional staff working at the power station, the staff will all need to access the site usually by private vehicle (LIR paragraphs 25.18 and 29.52 [\[REP1-045\]](#)). Retaining the

Sizewell Link Road would provide an alternative route or additional workers to use to access the power station.

- 2.9. In addition, the current B1122 is the designated HGV route and AIL route to the Sizewell B nuclear power station. Once the Sizewell Link Road has been constructed and provided it is to be retained post-construction of Sizewell C, it can become the dedicated HGV route for Sizewell B and C stations (LIR paragraph 16.93 [[REP1-045](#)]).
- 2.10. The Sizewell A station is currently being decommissioned; it retains approximately between 250 – 400 staff on site undertaking decommissioning works. These works are likely to continue over many years to come. The Sizewell Link Road will offer an attractive alternative to the downgraded B1122 for workers needing to access the Sizewell A station.
- 2.11. ESC therefore considers the legacy benefit of the Sizewell link road as the dedicated HGV route to the Sizewell A, B and C stations combined with downgrading of the B 1122 for the benefit of the communities along the route (having regard to the 2016 Accent Report [[REP1-090](#)] which considered the impacts of traffic on these communities) and make it more attractive to cyclists and pedestrians and therefore less attractive to motor vehicles, to be hugely significant.
- 2.12. We therefore support retention of the Sizewell Link Road post-construction of the Sizewell C station primarily for the benefits it will bring to the local communities of Theberton and Middleton Moor.

3. Main Development Site Pylon solution

- 3.1. ESC remains concerned that alternative options to overhead power lines at the Sizewell C site will result in expansion of the nuclear platform. This would result in pressure to extend the platform eastwards – towards the coastline, or westwards towards the Site of Special Scientific Interest (SSSI) (LIR paragraphs 6.49-6.50 [[REP1-045](#)]).
- 3.2. Second to this, ESC consider that the four pylons proposed will primarily be seen from a distance in the foreground of the power station buildings. When viewed from viewpoints to the north it is the westward (existing) double line of pylons that are considered to be visually harmful. The submitted Landscape and Visual Impact Assessment for the Main Development Site [[APP-216](#)] considers the new pylons from para. 13.6.228 onwards and in the various relevant viewpoint photos. This Assessment supports this view that the pylons will be subsumed into the wider impacts of the station but also from nearer views such as the view from the tank traps on the beach. The new pylons are hardly ever, if at all, seen as single standalone entities or as a standalone pylon group or line. From distances such as Coastguard Cottages and Springwatch Studio site, effects are Medium-Small scale. From Southwold, effects reduce to Small-Negligible. The pylons are always viewed in association with the other main, and more dominant, Main Development Site structures (LIR paragraph 6.49 [[REP1-045](#)]). ESC does not consider that the visual impact of the additional pylons is justification for moving the platform eastwards or westwards to move the pylons underground.

- 3.3. Moving the platform eastwards would add to existing concerns East Suffolk Council has with regards to the position of the proposed sea defences on the shoreline and the subsequent impact this will have in relation to exposure under coastal change. Moving these defences eastwards towards the sea would have the consequence that they would become exposed sooner than currently modelled and anticipated (LIR paragraph 6.50 [\[REP1-045\]](#)). This has not been fully assessed in the DCO as submitted so we can only use our technical expertise to reach this conclusion.
- 3.4. Moving the platform westwards would result in additional loss of SSSI which ESC cannot support. Loss of the SSSI and its replacement has been very carefully calculated and restricted to the absolute minimum, further loss resulting from extending the platform westwards would be unacceptable to ESC and not appropriately assessed in the DCO as submitted (LIR paragraph 6.50 [\[REP1-045\]](#)).
- 3.5. Having reviewed documentation from the Applicant, ESC agrees that any alternative that has the potential to cause harm through release of harmful gases, such as a gas insulated line solution that requires use of Sulphur hexafluoride (SF6 gas) is not appropriate from a climate change perspective (one of the most potent greenhouse gases). We acknowledge that this may be avoided through careful design and use of alternative less harmful gases, however if SF6 is used the potential for harm through attack would need to be assessed fully. ESC is not convinced there is space available for the Applicant to use a gas insulated line alternative to pylons without further encroaching unacceptably on the SSSI. Again, we refer to our concerns with regards to extending the platform eastwards or westwards (LIR paragraph 6.50 [\[REP1-045\]](#)).

4. Outage car parking at Goose Hill

- 4.1. ESC considers that the evidence provided in support of the necessity of the outage car park area for the Sizewell C station separate from that proposed for the Sizewell B station is acceptable (LIR paragraph 6.74 [\[REP1-045\]](#)).
- 4.2. The outage car parking for Sizewell B is proposed to utilise existing car parking at the Sizewell B site, which will not be directly accessible to the Sizewell C site necessitating an arrangement such as a shuttle bus on the Sizewell Gap Road, Lovers Lane, and Abbey Road for outage workers to access the Sizewell C site if they were to utilise Sizewell B outage car parking. This would be disruptive in the local area given the 24-hour shift work usually undertaken during an outage (LIR paragraph 6.57 [\[REP1-045\]](#)).
- 4.3. Although outages will be planned not to coincide with each other, unplanned outages will happen resulting in overlap of outage workers for Sizewell B and / or C. Shared outage car parking would not be enough to service two outages at the same time resulting in the need for additional car parking (LIR paragraph 6.57 [\[REP1-045\]](#)). The recent ASI that stopped at the car parking area to the north of Sizewell B was during an outage and the car parking at the B station was approaching full capacity.
- 4.4. As such, ESC is content that the optimal solution would be a carefully designed and landscaped 600 space carpark adjacent to the entrance to the site. ESC considers that there are exceptional circumstances justifying this development in the AONB which are in the public interest, in accordance with paragraph 172 of the NPPF (LIR

paragraph 6.12 [[REP1-045](#)]). Point (A) of Paragraph 172 notes consideration of development within this protected landscape should include an assessment of the need for the development including in terms of any national considerations. The identification of the Sizewell site in NPS EN-6 is therefore a highly relevant consideration. Paragraph C.8.83 of NPS EN-6 Volume II notes that the Government recognises the potential for adverse harm on the AONB. However, as explained in Part 2 of this NPS, there is a need to ensure sufficient sites are available for development to meet the Government's energy policy objectives. In view of this and in view of the limited number of potentially suitable sites, the Government does not think the issues in relation to this criterion are sufficient to justify (against this criterion) not including the site in this NPS. As such, ESC considers this amounts to exceptional circumstances justifying development in the AONB and is in the public interest.

- 4.5. In their Planning Statement, the Applicant references paragraph 172 and 173 of the NPPF (8.8.17 - [APP-590](#)), they reference their Landscape and Visual Impact Assessment, at 8.8.10 they refer to EN-1 and the need to demonstrate exceptional circumstances for development in the AONB. Section 3.1 of the Planning Statement sets out in detail the established need for new nuclear as identified in EN-1 and EN-6. The paper explores if there has been any change in circumstances such that significant weight should not be given to EN-1 and EN-6, it concludes that there is no relevant change of circumstances, therefore the need is established which justifies development within the protected landscape. At 7.2 the Applicant details the suggested benefits of the Sizewell C project in taking into account environmental, social and economic impacts. Through good design, this would have minimal impact on the AONB and wider landscape views when not in use. Restrictions on the DCO consent granted could ensure that this area is only utilised for outage car parking in the future.

5. SSSI Crossing

- 5.1. ESC considers that the proposed hybrid causeway / open span bridge in the application offers a reasonable compromise to previously requested fully open three span bridge options (paragraph 8.39 [[REP1-045](#)]) seen in previous rounds of public consultation (pre-application).
- 5.2. ESC appreciates the concerns highlighted by other parties with regards to potential impact on species connectivity, in particular invertebrates. ESC is of the opinion that the causeway provides an opportunity for landscaping of the crossing that would be beneficial in the longer term from a Landscape and Visual Impact Assessment perspective (paragraph 8.41 of the LIR [[REP1-045](#)]).
- 5.3. ESC would like the Applicant to consider revisions to the design of the bridge and embankment to further reduce its ecological impact. For example, as in the LIR (paragraph 8.42 [[REP1-045](#)]), ESC considers that an increase in height of the bridge above that proposed (i.e., > 4m) (which may involve a slight raising of the deck height of the carriageway) would be beneficial for species connectivity, such as some species of invertebrate (particularly those which see by positive phototaxis such as dragonflies

and damselflies), by increasing light availability. We welcome the Applicant's suggestion that they will be able to revise the design further and we look forward to seeing further details at Deadline 4.