

Issue Specific Hearing 14 (ISH14) on Development Consent Order, Deed of Obligation and allied documents.

Theberton and Eastbridge Parish Council, Stop Sizewell C and Minsmere Levels Stakeholders Group

Oral Contribution by Cllr. Paul Collins

Please note the summary of my oral contribution is bulleted and in italics. Any text highlighted with bold and italic emphasis in the following submission represents additional information not conveyed in the oral submission.

2. Implications for the content and drafting of the DCO of points raised on the letter of 3 September 2021 from Walker Morris on behalf of Northumbrian Water

- *No comments on this item*

3. (A) Articles 9, 9A and 9B of the dDCO and in particular the points made by Suffolk County Council in their response to the Examining Authority's commentary on the DCO [PD-038]. Without limiting the foregoing, the ExA would like to hear argument from Suffolk County Council and the Applicant on:

- *No comments on this item*
 - a. Whether it is right not to require the Secretary of State's consent to transfer of the DCO to a person holding a licence under s.3 of the Nuclear Installations Act 1965 and if so whether it should be stated to be a licence to operate Sizewell C
 - b. Whether it is right to limit the enforceability of the Deed of Obligation to any person to whom the power to construct or operate Work No. 1A(a) to (h) has been transferred or granted under article 9
 - c. Should Art 9 state that the DoO is enforceable against the undertaker named in the DCO?
 - d. Whether there should be deeds of covenant by transferees in addition to the provisions of Art 9 as drafted in [REP7-006] (which is revision 8)
 - e. (The ExA notes in passing that Art 9(2) refers to Work No. 1(a) to (h). Should this be Work No. 1A(a) to (h)?)

3 (B) the trust deed referred to during ISH12, item 2(iv)

- *No comments on this item*

4. Parameter plans and Approved Plans – which take precedence? – Art 4 of the dDCO and Requirement 8

- *No comments on this item*

5. Structure of Control Documents and Subsequent Approvals –

- a. to consider Appendix C to the Applicant's Response to the Examining Authority's commentary on the DCO [PD-038].

- *I want to thank both Mr. Tate and Mr. Bedford for being so clear on these issues.*
- *But I'd like to go back in particular, initially to the whole issue about accommodation.*
- *We remain concerned that if there aren't really good longstops, and commitments to actually produce the caravan park and the accommodation campus on a reasonable timescale that there are going to be significant issues in the local rental commercial housing sector.*
- *Because despite what the applicant says about there being a similar number of properties within the 45 minute radius, those 45 minute radius **properties** are pretty well spaced out.*
- *They're not in particularly good communication by car, bus, or train to the site.*
- *So, there's going to be a considerable amount of reluctance on the part of **the applicant's** own workers to move out into these sorts of areas.*
- ***Indeed, one of the justifications given by the applicant for siting the campus as close to the construction site as possible, and not to split the site with alternatives elsewhere in Leiston or further afield such as Saxmundham etc., is because of its proximity to the development site and the applicant's assertion concerning the reluctance of their construction workers to be housed any distance from the site because of travel times to and from a shift at the site.***
- *And you're quite right that places like Leiston, are so much smaller than Bridgewater. So, it's really is going to cause a significant issue with potential uplifting of rents in this area as a result.*
- *I would also go back to the fact that we expressed some concern, some time ago, when we were talking about the increase of the maximum number of workers from 5400 to 7900. I think something of that, that nature, and there was no apparent increase in the amount of provided accommodation for workers in the area, and that they're relying pretty much totally on the commercial sector to actually provide it, which is, which is yet another reason why this this strategy just does not seem to be viable, or viable, perhaps is the worst situation. It is going to be extremely difficult, I think, to actually provide it. And I'm sorry, but no amount of contingency funds is suddenly going to wake up that sort of number of accommodation places in the commercial sector. It's just a flight of fancy.*
- ***Mr Brock** - Maybe why the longstop is better?*
- ***Paul Collins** - It might well be, yes. It needs to be a pretty tight longstop I would say, particularly on the accommodation side.*
- ***Mr Brock** - You want to wicketkeeper not a longstop.*
- ***Paul Collins** - Yeah, he needs to be pretty close. I think that's for sure.*
- *There are issues on the transport side also. I mean, clearly, we're already faced with a situation where the Sizewell Link Road in this area will not be provided before the huge amount of traffic will be going up and down the B1122. We do need to make sure if that's going to be provided later - we would rather it have been provided in advance - it will be much better to make sure that those sorts of longstops are also*

pretty tight because the disruption caused by any delay to those things has got to be considerable.

- b. To include concerns flagged by East Suffolk Council at ISH11 re: the Code of Construction Practice.
- c. To address certain delivery questions including barriers on non-railway land.
- d. Other issues arising out of ISH12 and 13

6. Other issues arising from responses to the Examining Authority's commentary on the DCO [PD-038]

7. Issues arising from responses to ExQs2 on the DCO, DoO and related matters

8. Reasonable endeavours

9. Practical arrangements for submission and form of the Applicant's preferred draft DCO, executed DoO and allied documentation

10. The Examining Authority reminds the Applicant and the Councils of point 27 of Annex B "Observations on the draft section 106 agreement" to [PD009] of 22 December 2020 – the need for the Confirmation and Compliance Document and the confirmations from the councils that the right parties and land interests are bound and that the s.106 agreement (now DoO) has been properly executed.

11. Any other matters relevant to the subject matter of this ISH

- *My colleague, Mr. Bickers, at a previous session did bring up the whole issue of the property price support scheme (PPSS). I'm not going to go through it all again here but we will be putting in some further details about our concern that this isn't properly addressed anywhere within the DCO or the Deed of Obligation.*
- *Whilst we understand that, there may not be any legal precedent as to why it should be there, it is sort of strange that a scheme was executed in Hinkley which is considerably different to the one that is being proposed here and it's not really appeared in any of these discussions whatsoever.*
- *So, we will continue to do that. But I'm quite happy to do it through a written submission at the next deadline.*
- **Mr Brock** - *You say the property price scheme. We have had discussions about it earlier this week. Just remind me this is not a document, which is in the examination tool is it?*
- **Paul Collins** - *No, I believe that the applicant did say that they would provide a copy of the property price support scheme that's been proposed so far and it has been circulated to some property owners here. The applicant has indicated that they have executed it for a number of properties, but they are all within pretty much the red boundary of the site. Whereas when you look at the same scheme in Hinkley, it does go out somewhat from the outside of those lines of the site, which is not the case here. So, we still have an issue with this.*
- **Following the meeting we have had further contact with the applicant regarding the current Sizewell C Property Price Support Scheme and they have agreed to discuss our concerns further and look to how the**

PPSS can be adjusted given their experiences at Hinkley and our concerns regarding the restrictive nature of the current proposal.

- ***We remain concerned, however, that there is no commitment to the scheme within the Deed of Obligation which potentially leaves local residents in a somewhat precarious position should they need to sell their houses to move employment or release equity for care purposes.***