



The Sizewell C Project

9.105 Written Submissions Responding to Actions Arising from Issue Specific Hearing 12: Community (15 September 2021)

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1 ISSUE SPECIFIC HEARING 12: COMMUNITY

1.1 Introduction

1.1.1 This document contains the Applicant's written submissions responding to actions arising from Issue Specific Hearing 12 (ISH12) held on 15 September 2021.

1.1.2 This document corresponds to the Applicant's **Written Summaries of Oral Submissions made at ISH12** (Doc Ref. 9.101) submitted at Deadline 8.

1.2 Housing Contingency Fund

1.2.1 Further to the ISH, SZC Co. can confirm that the provisions for the Housing Contingency Fund have been incorporated into the **draft Deed of Obligation** (Doc. Ref 8.17(G)) at Schedule 3. Those provisions are contingent on any delay beyond identified longstop milestones for the provision of worker accommodation at the campus and LEEIE. The same Schedule commits to delivery by those long stop milestones.

1.3 Noise Complaint Procedure

1.3.1 A question was asked during ISH12 by Ms Pilkington about the mechanisms for complaining about noise generated by trains associated with the construction of the Sizewell C project.

1.3.2 Complaints can either be made to SZC Co. via the complaints process set out in Part A of the **Code of Construction Practice** (Doc Ref 8.11(E)), or they could be made direct to East Suffolk Council, and they will deal with them in accordance with their own procedures liaising with SZC Co. directly where appropriate to resolve them.

1.3.3 SZC Co.'s complaints handling process covers all aspects of the construction of the Sizewell C project, including in relation to noise or vibration from Sizewell C's construction trains.

1.4 Ventilation measures

1.4.1 During ISH12, East Suffolk Council requested that SZC Co. considers an option for a reduced level of intervention under the **Noise Mitigation Scheme** (Annex W of the **Deed of Obligation** (Doc Ref 8.17(G))), where properties affected by lower levels of railway noise might gain more protection than was included in the scheme at that time, even though the current level is agreed to fall below SOAEL.

- 1.4.2 The maximum noise level threshold to trigger eligibility for insulation as a result of railway noise was set at 73dB L_{AFmax} (façade) in the **Noise Mitigation Scheme** (Annex W of the **Deed of Obligation** (Doc Ref 8.17(G))). That value is considered to be the highest noise level at which a ‘standard’ double-glazed window will typically reduce internal levels to below the 45dB L_{AFmax} threshold, when it is closed; the World Health Organisation say that noise levels within bedrooms should not exceed 45dB L_{AFmax} more than 10 to 15 times per night to avoid sleep disturbance¹.
- 1.4.3 The derivation of 73dB L_{AFmax} (façade) value (or 70dB L_{AFmax} as a free-field value) was set out in paragraphs 3.2.13 to 3.2.16 in the **Sleep Disturbance Assessment** paper in **Volume 3, Appendix 9.3.D** of the **First ES Addendum** [AS-257, electronic page 498]; it effectively assumed that by closing their existing windows, people would keep their internal noise levels below the 45dB threshold.
- 1.4.4 At levels below 60dB L_{AFmax}, the 15dB reduction that is obtained from a partially open window means that the internal 45dB L_{AFmax} threshold that the World Health Organisation say should not be exceeded is achieved even if the window is partially open. Since the window is assumed to be open in that instance, the standard of glazing does not affect the outcome.
- 1.4.5 East Suffolk Council’s view was that at noise levels of between 60 and 73dB L_{AFmax}, achieving an internal noise level of 45dB L_{AFmax} is dependent on people keeping their windows closed. In summer temperatures, even at night, they considered this to be unreasonable without an alternative means of ventilation being available to them.
- 1.4.6 To provide this alternative means of ventilating properties subject to these levels of railway noise, East Suffolk Council suggested that the **Noise Mitigation Scheme** (Annex W of the **Deed of Obligation** (Doc Ref 8.17(G))) should allow for a ‘ventilation only’ offer. This would allow people in properties subject to railway noise level of between 60 and 73dB L_{AFmax} the option of keeping their windows closed and ventilating their properties.
- 1.4.7 SZC Co. has amended the **Noise Mitigation Scheme** (Annex W of the **Deed of Obligation** (Doc Ref 8.17(G))) submitted at Deadline 8 to reflect East Suffolk Council’s request, and a ‘ventilation only’ element is now included at railway noise levels of between 60 and 73dB L_{AFmax}.

¹ World Health Organisation Guidelines for Community Noise (1999)

1.5 Bogie Parameters of the flask wagons

1.5.1 Issues relating to this heading are now fully set out in response to ExQ3 at question NV.3.8 (Doc Ref. 9.97).

1.6 Saturday working at the Associated Development sites

1.6.1 Further to ISH12 and oral representation around the working hours for the construction of the Associated Development highway schemes - Sizewell link road, Two village bypass and Yoxford roundabout, SZC Co. can confirm that the current baseline assumption for the delivery durations shown in the **Implementation Plan** [REP2-044] and **Construction Method Statement** Plate 2.1 [REP7-015] assumes that the working hours are aligned with [REP7-037] Code of Construction Practice, Part C, Section 1.1.6, that being Monday to Saturday 0700 to 1900.

1.6.2 The Applicant would have to reconsider the proposed schedule should the Code of Construction Practice be amended from the stated working hours.

1.6.3 The removal of Saturday working from the delivery programme of the highway and Rail schemes would extend the construction period for each scheme as estimated below:

- Sizewell link road – up to 2 months
- Two village bypass – up to 2 months
- Yoxford roundabout – up to 1 month
- Rail Works – up to 2 months
- Northern P&R, Southern P&R and Freight Management Centre – up to 2 months
- Overall, the compounded extension effect would be up to 4 to 6 months

1.6.4 Saturday works would generally be planned as low noise generating activities such as general earthworks and, where possible, high noise generating activities would be avoided on Saturday afternoon, after 1300. It is not expected that permitting higher noise activity on Saturday afternoon would provide benefit or programme reductions.

1.6.5 It should be noted that irrespective of the permitted general construction activity during Saturdays there will be a requirement for periodic Saturday, Sunday and night-time working for discrete elements of works such as

highway ties, to mitigate impact on highway users, and works requiring rail possession of the East Suffolk Line. These works would be advised to ESC and in line with the requirements in the respective Noise Monitoring and Mitigation Plans.

1.7 Safety of horse riders using the Coast Path along the coast during construction

- 1.7.1 In response to an Interested Party's comment on whether a risk assessment has been undertaken for use of the Coast Path during construction by horse riders, risk assessments for potential hazards for the general public during construction, including horse riders using the Coast Path, have been undertaken throughout the design process under the Construction (Design and Management) Regulations 2015 (CDM2015), which place legal duties on all those involved in Design and Construction within the UK. Potential hazards have been identified early so they can be eliminated and/or managed through design. Potential hazards to all users of the Coast Path and beach where it lies within the Main Development Site, including horse riders, have been identified and measures identified to minimise risk. Measures include temporary diversions across the beach to avoid construction activities, ensuring fences/signage keeping public out of construction areas is in place for the duration of construction, signage advising of construction works and diversions in place, and presence of a banksman to ensure safety of public. All hazards and risk assessments will continue to be updated as the design proceeds further and, where appropriate designs adapted to eliminate, minimise or manage hazards. This will be continued through the detailed design and construction process.

1.8 Approval of the Coast Path alignment

- 1.8.1 The broad alignment of the Suffolk Coast Path is secured on the relevant **Access and Rights of Way Plan (Sheet 6 of 28)** [[REP5-008](#)] listed in Schedule 5 of the dDCO. This drawing shows the broad alignment and states:

"The precise alignment of the permanent footpath commencing at PCF1/4 and terminating at PCF1/5 will accord with the layout and scale details of the hard coastal defence feature to be submitted and approved pursuant to Requirement 12B"

- 1.8.2 The precise alignment of the Suffolk Coast Path would be secured under Schedule 2, Requirement 12B of the dDCO, as part of the submission of Reserved Matters for the Hard Coastal Defence Feature (HCDF). The details of the wider public rights of way diversion are then secured by Requirement 6A.

- 1.8.3 Prior to construction of the HCDF commencing, details of its layout, scale and external appearance must be submitted to and approved by East Suffolk Council, in consultation with the Marine Management Organisation and the Environment Agency. Pursuant to paragraph 1(4) of Schedule 23 (procedure for approvals, consents and appeals), as the discharging authority for Requirement 12B, East Suffolk Council is also required to consult Suffolk County Council on the details submitted.
- 1.8.4 Details must accord/generally accord (as relevant) with the plans and documents listed in Requirement 12B. None of these specify the alignment of the Suffolk Coast Path and so the precise alignment is decided at that stage and it is not appropriate for it to be specified now.
- 1.8.5 The Suffolk Coast Path is the only PRoW that requires the precise alignment to be approved post-consent. The precise alignment of all others is secured on the Access and Rights of Way Plans. This approach is being taken for the Suffolk Coast Path for the following reasons:
- SZC Co. has applied for a Nuclear Site Licence through the Office for Nuclear Regulation and that process is ongoing. That application includes consideration of the HCDF and it would be premature to apply for a detailed scheme at a stage when the process with ONR is ongoing.
 - Elements of the power station itself include flexibility as it must satisfy a wide range of operational and regulatory requirements. It follows that flexibility should also be provided in the HCDF design at this stage, to allow its detailed design to best respond to and help screen lower lying power station structures once those details are finalised.
 - Without a detailed design of the HCDF, it would be overly (and unnecessarily) constraining to define the precise alignment of the Suffolk Coast Path.
- 1.9 **Bridleway 19**
- 1.9.1 The Applicant commits to continuity of Bridleway 19 on its current route during the early years of the development until such time as the diversion on a new permanent off-road bridleway around the construction site is completed. Upon restoration of the site, Bridleway 19 will be reinstated on its existing route, with the legacy benefit of the permanent off-road bridleway remaining to the public also.
- 1.9.2 Article 14 (2) of the **draft DCO** (Doc Ref. 3.1(I)) requires a temporary alternative route to be in place before any public right of way is permanently

stopped up or temporary closed. This control on the power to stop up/close public rights of way is standard drafting in DCOs and it ensures that the public rights of way network remains open for use throughout the construction and operational phases of the proposed development. The relevant provisions in the **draft DCO** (Doc Ref. 3.1(I)) can be found in article 14(2) (for permanent stopping ups) and 17(6) (for temporary closures). Requirement 6A then secures a public rights of way implementation plan to be submitted to and approved by SCC.

1.9.3 In response to a question on safety of users of Bridleway 19 during the Construction Phase on both the current route and the proposed diversion route, this will be subject to the usual Highways (including approval by Highway Authority) and CDM (2015) design and risk assessments.

1.9.4 In response to a concern raised by an Interested Party regarding the adequacy of Pegasus crossings for horse riders at the roundabout on the B1122 at the entrance to the main development site the Pegasus crossings have been agreed with Suffolk County Council through the **Rights of Way and Access Strategy** [REP7-023] (further revision submitted at Deadline 8 (Doc. Ref. 6.3 15I(D)). In consideration of an underpass provision raised by the Interested Party, an excavation depth of more than 5m would be required to accommodate an underpass to include the road construction, structure and sufficient height clearance for equestrians. To provide suitable maximum approach gradients access ramps to an equestrian underpass would therefore be over some 100m in length either side of the crossing points. An existing watercourse to the west of the B1122 is known to flood at the Abbey Road/Lovers Lane junction. At the main development site roundabout an underpass would be below the level of the existing watercourse and proposed surface water attenuation basin and therefore be at risk of flooding. The scale of an underpass and associated ramps would require removal of the existing hedgerow to the west of the B1122. The speed limit is proposed to be permanently reduced to 40mph for B1122 Abbey Road and design speeds at the roundabout will be a maximum of 30 mph in accordance with highway design standards. Pegasus crossings for equestrians will be at locations where traffic speeds are lowest and where drivers will be expecting to slow down. Due to the drainage, environmental and physical constraints underpasses at the B1122 for the equestrian crossings are considered inappropriate and at grade Pegasus signalled crossing are provided.

1.10 Sandlings Walk

1.10.1 In response to a comment by the RSPB regarding the location of Sandlings Walk to clarify whether this will be relocated from the Applicant's to RSPB land as stated in their Deadline 6 Submission - Comments on any additional

information/submissions received by D5 [\[REP6-046\]](#) (see paragraph 3.2), SZC Co. confirms that it will provide the route of Sandlings Walk within the red line boundary, within EDF's land ownership.

- 1.10.2 In response to a request made by Suffolk County Council that the route of Sandlings Walk should be designated a formal public right of way as a legacy benefit of the Project rather than a permissive footpath, SZC Co. confirms that a new bridleway through Kenton Hills and Goose Hill, linking Bridleway 19 with the accessible coastline, provision for this will be made during the operational phase. This will be the permanent route of Sandlings Walk and is secured under the Deed of Obligation. This is included in the updated Rights of Way and Access Strategy submitted at Deadline 8 (Doc. Ref. 6.3 15I(D)).

1.11 Latest position on Community Fund, Public Services Resilience Fund and Natural Environment Funds

- 1.11.1 The position reached through engagement on these funds is summarised below.

a) Community Fund

- 1.11.2 Provisions for the Sizewell C Community Fund are set out in Schedule 14 of the **draft Deed of Obligation** (Doc Ref. 8.17(G)) and agreed with ESC and SCC.

- 1.11.3 As the draft Deed explains (Schedule 14 paragraph 2.1), its purpose is to mitigate the intangible and residual impacts of the Project on the communities in the area of benefit through providing grants for schemes, measures and projects which promote the economic, social or environmental well-being of those communities and enhance their quality of life.

- 1.11.4 The size of the fund has been agreed at £23 million with £2 million to be paid on or before commencement and £1.9 million annually on each anniversary of commencement during the construction period. The fund is comparable to the equivalent fund at Hinkley Point C (but indexed for inflation) and the proposed arrangements for the fund are based on those established at HPC. As at Hinkley, the fund is to be run by the local county Community Foundation to give a measure of public confidence that it is independent – run by the community, for the community.

- 1.11.5 The HPC experience has been very positive but there have been some lessons learned which are reflected in the provisions in Schedule 14 including:

- a) At HPC there has been some mixed experience in communities' ability to engage with the fund. Some have been particularly able to engage whilst others have needed more assistance. As a development from learning at HPC, Schedule 14 includes:
- a requirement for the Suffolk Community Foundation (SCF) to work with Community Action Suffolk to help to ensure that the potential recipients of grants have the required skills and capacity to meet the relevant criteria and optimise the use of the grants (paragraph 2.4.9);
 - a similar obligation for Suffolk Community Foundation to liaise with the East Suffolk Community Partnerships to assist communities to identify projects suitable for the receipt of grants and to assist those with protected characteristics in identifying projects suitable for the receipt of grants (paragraph 2.4.11).
- b) The schedule sets out the particular role of ESC and SCC in assisting with the identification of schemes suitable for strategic grants (paragraph 2.4.10). Experience suggests there may be a particular benefit in utilising cross-stakeholder experience, which is to be provided by the Oversight Partnership in this respect.
- c) No specific geographical ring-fencing is proposed. At HPC, the experience has been mixed with some ring fencing being particularly successful (for example at Stogursey) but with other ring fencing provisions being perhaps too small scale and locally focussed. At Otterhampton, for instance, which is a small geographical area, there has been some difficulty in finding sufficient qualifying projects, although that has improved recently.

In place of ring fencing, paragraph 2.5 of the schedule provides that the Examining Authority should particularly take into account the degree and severity of impact arising from SZC and give priority to projects which are located close to the main development and associated development sites.

1.11.6 It may be of interest to the Examining Authority to refer to the website for the Hinkley Point C Community Fund, which includes its Annual Report 2020/21 <https://www.hpcfunds.co.uk/>. The Annual Report provides a helpful reference in identifying matters such as:

- the geography of awarded grants (page 1);
- the distribution between small, open and strategic grants (page 1) reflecting the dominance in terms of the number of schemes

represented by small grants (less than £5,000) but that the weight of the fund is principally spent on larger open and strategic grants;

- a breakdown of grants awarded under each heading is provided on subsequent pages including case studies of funded projects.

1.11.7 SZC. Co commends the HPC Annual Report to the examination as an example of proactive and successful community working to significantly enhance the quality of life of communities close to or affected by the construction of the new nuclear power station. With the benefit of learning from HPC, there is every reason to expect that the Community Fund may be even more successful for Sizewell C.

b) **Public Services Resilience Fund**

1.11.8 SZC Co. has agreed to provide funding towards public service and community safety measures that target the most vulnerable members of the community, bolstering activities of the Housing Fund and other embedded and additional measures.

1.11.9 This includes all resources identified in **Annex N** to the **Local Impact Report** [REP1-059] and is largely within the gift of ESC to deliver – though the flexibility in definitions means that we will require approval of activities by the CSWG (subject to further negotiation).

1.11.10 This will include, as set out in the **Draft Deed of Obligation** [REP7-040] at **Schedule 5**, the following measures, which have been developed through collaboration with SCC and ESC:

i. **Support for SCC's Community Safety Activities (DoO = 'Community Safety Resilience Measures' – c. £1.8m**

1.11.11 Contributions have been agreed towards SCC's community safety and domestic abuse programmes including:

- provision for training resources linked to criminal exploitation – funding 1 FTE position for the entirety of construction;
- domestic abuse outreach service including 24/7 helpline;
- safe accommodation (providing safe, temporary, emergency bedspaces for people experiencing domestic abuse);
- Sanctuary Scheme (providing home security measures, which are available for high-risk domestic abuse victims and their children to remain safe in their own homes); and

- Venta perpetrator scheme.

1.11.12 These are existing schemes that are known to be effective and would ensure a precautionary approach to risk. The contributions have been developed through negotiation of a statistical approach, using risk factors and existing per-head expenditure. They are considered conservative – given the mitigating factors for the non-home-based (NHB) workforce’s likelihood to undertake risk-taking behaviour, and Hinkley Point C data on low-levels of crime and non-crime incidents.

- ii. **Support for ESC’s Community Safety Activities ‘Local Community Safety Measures’ – c. £1.6m**

1.11.13 This includes resourcing for all items raised in **Annex N** to the **Local Impact Report** [[REP1-059](#)].

1.11.14 SZC Co. and ESC have agreed a contribution towards the extension of existing community safety programmes currently run by East Suffolk Council and Community Safety Partnerships including resource to deliver programmes related to criminal exploitation, vulnerability to abuse, families at risk of crisis, community liaison and training.

1.11.15 These are existing schemes that are known to be effective and would ensure a precautionary approach to risk. The contributions have been developed through negotiation of a statistical approach, using risk factors and existing per-head expenditure. They are considered conservative – given the mitigating factors for the non-home-based (NHB) workforce’s likelihood to undertake risk-taking behaviour, and Hinkley Point C data on low-levels of crime and non-crime incidents.

- iii. **Additional Adult Community Services (ACS) and Children and Young People’s (CYP) Service Demand – c. £2.4m**

1.11.16 SCC are concerned that there will be an increase in demand for CYP and ACS services that may not be funded through taxation or central government grants, primarily related to the net additional NHB worker population in project accommodation.

1.11.17 SZC Co. notes that workers are evidentially (from HPC) less likely to undertake risky behaviours, and have many mitigating factors that would reduce risk, but is cognisant of uncertainty relating to key areas of community safety – workers may directly require some services, or through their actions cause demand in the rest of the population for others.

1.11.18 Through engagement, SZC Co. and SCC have agreed an approach that uses current per-head spend rates for key services – including

safeguarding, family support and support for at-risk children – applied to the workforce profile for NHB workers (considered net additional) – to provider an appropriate and proportionate annual contribution to support those services (which are fundamentally linked to community safety – they are not just responsive but provide outreach and prevention).

iv. Home Care Services – up to c. £2.5m

- 1.11.19 SCC are concerned that changes related to the Project – including traffic, workforce retention/recruitment, perception of the area and parking may cause costs to rise in the commissioning of home care services.
- 1.11.20 SZC Co. does not consider that these effects are evidenced or are '*likely significant effects*' but understands the risk attributed to vulnerable people in receipt of services, and their sensitivity to change.
- 1.11.21 As such SZC Co. has agreed to provide funding for SCC to increase the banding of service provision for commissioned home care within 10 miles of Sizewell C for the duration of the Construction Period, to safeguard against the potential community risk of people not being able to access care.

v. Note on Other Complementary Funds

- 1.11.22 As set out in **SZC Co's Response to ExA Q2** (Cl.2.3) [[REP7-056](#)], the Housing Fund is also developed with vulnerable people in-mind, and is adaptable, proactive and reactive to reduce the risks of housing need and homelessness for those particularly vulnerable to change. This also includes provision funding for SCC in the event that information provided by SCC (that the Accommodation Working Group agrees) shows closure of Council-provided residential care homes directly as a result of the Sizewell C Project.
- 1.11.23 In addition, **Schedule 14** of the **Draft Deed of Obligation** [[REP7-040](#)] requires the Suffolk Community Foundation, as part of the administration of the Community Fund, to support people with and projects supporting those with protected characteristics in applying for grants.
- 1.11.24 The Community Fund would be used to mitigate intangible and residual effects on local communities as a result of combined environmental effects, both perceived and real of the Sizewell C Project via grants for schemes, measures and projects which promote economic, social and environmental well-being and improvements to quality of life.

vi. Community Safety Working Group

- 1.11.25 This group ensures that funding is applied to the measures that members agree would be most effective, based on evidence and the scale and location of workforce. It has a substantial membership to cover all areas of community safety and ensure that there is cross-collaboration between different services who seek to meet similar or complementary outcomes. It ensures the effectiveness of spending of such funds.
- 1.11.26 This is set out at **Paragraph 3.4 of Schedule 5 of the Draft Deed of Obligation** [\[REP7-040\]](#).

vii. Funding for School Places and Resilience in Early Years and School Settings

- 1.11.27 SZC Co. and SCC are agreed on the indicative breakdown of and per-place cost of provision and have agreed a precautionary approach to provide non-contingent funding for 60 primary places (permanent expansion of existing schools) to be applied in Leiston unless otherwise agreed, and provision for 30 spaces in early years settings; two Special Educational Needs places, and a contingency for 12 secondary places.
- 1.11.28 This is based on the assessment of net additional demand, and the location of said demand in comparison to existing supply.
- 1.11.29 In terms of school and early years resilience measures, SZC Co and SCC have agreed to fund the provision of 1 FTE Specialist Leader in Education providing English as Additional Language and PHSE support across education settings in the area; and to provide contingency funding for a further position if demonstrated to be required for 1 FTE Learning Support Assistant (for a range of Special Education Needs and Disabilities (SEND).
- 1.11.30 SZC Co. and SCC are working to finalise agreement on the approach to release of an Adult Social Care Contingency Fund, a contingency element of funding for School and Early Years Resilience Measures (though the overall scale of funding is agreed, based on similar quantitative measures as set out for the non-contingent element of funding for school capacity).
- 1.11.31 SZC Co. and SCC agree that the next step is to agree the spend profile and the mechanism for any draw down of the contingent element.

viii. Release/Application of Funding

- 1.11.32 The funds in **Schedule 5 of the Draft Deed of Obligation** [\[REP7-040\]](#) are scaled and profiled based on prescriptive funding described above for

specific measures agreed quantitatively based on **Annex N** of the **Local Impact Report** [[REP1-059](#)].

1.11.33 However, in drafting and through engagement, SZC Co. understands that flexibility and responsiveness is important in the delivery of resources to reduce risks identified.

1.11.34 As such SZC Co. has included an approval mechanism for the expenditure of these funds. This does not jeopardise the release of agreed non-contingent funding, but ensures that the money is spent on resources and projects that reflect the wider experience and expertise of the Community Safety Working Group, and allows the Applicant to ensure that the contributions are linked to the Project; but also importantly does not limit the Council to very prescriptive measures that given the state of social care and level of general uncertainty may need to change in the future.

c) **Natural Environment Fund**

1.11.35 The terms of the Natural Environment Fund are set out in Schedule 11 of the draft Deed of Obligation (reference) and are very substantially agreed. The main outstanding details which have not yet been addressed are:

- the distribution of funds annually, i.e. the total of the fund is agreed at £12 million and the parties expect £8 million of this to be available for the construction period and £4 million for operations but the precise annual availability of the Fund is yet to be settled and written up in the draft Deed;
- the proportion of the Fund that would be ring fenced for the AONB.

1.11.36 These matters are not the subject of any significant controversy but the draft Deed represents the current state of work in progress.

1.11.37 Again, the principle of the Fund has a basis in the Hinkley Point C Section 106 Agreement and it is working successfully at Hinkley. The parties recognise, however, that the geography and environment of Suffolk is itself also unique and requires its own bespoke response. Active and constructive engagement with the principal stakeholders has enabled these principles to be settled, as reflected in Schedule 11.

1.11.38 The Fund would be administered through the AONB Partnership for whom the draft Deed provides funding for a Natural Environment Improvement Project Officer, whose responsibility is set out at paragraphs 2.4 and 2.5. In principle, the Project Officer would be responsible for stimulating, sourcing, assessing and bringing suitable projects to the Natural Environment Awards Panel for their consideration against a range of criteria

which are set out in paragraphs 2.5-2.8 of the Schedule. The SZC Natural Environment Implementation Manager at ESC will also support in relation to the fund, as well as having a wider role in terms of the natural environment.

- 1.11.39 The principal purpose of the Fund is to mitigate the landscape impacts of the Project, but additional objectives are identified in paragraph 2.5 including conserving and enhancing landscape character but also enhancing ecology, bio-diversity and wildlife. The mitigation of ecological impacts is addressed through other DCO commitments but all parties anticipate that there would be ecological benefit through the expenditure of the Fund and that this should be one of the considerations for the Awards Panel in determining applications made.
- 1.11.40 The make-up of the Panel is explained in Schedule 11 at paragraph 16. There are to be 5 core members (one each from ESC, SCC, Natural England, the AONB Partnership and SZC. Co) plus 3 additional members nominated by agreement of the core members.
- 1.11.41 The area of benefit for the fund is defined as East Suffolk but with a split between that part of the area which is within the AONB. The area largely reflects the potential area of visual influence of the project including its associated development but has been extended to reflect the full administrative boundary of East Suffolk through consultation with stakeholders. The criteria for the application of the Fund, however, should ensure awards to projects which optimise their ability to mitigate the residual impacts of Sizewell C.
- 1.11.42 The front loading of the fund is deliberate: establishing landscape and environmental enhancement projects early will maximise their ability to develop and mitigate short and longer term effects. For this reason, the Schedule provides for the mechanisms which it establishes (the Awards Panel, the project officer etc) to be funded throughout the construction period and for a period of 3 years following the completion of construction (paragraph 4.1) but paragraph 5 provides that there should be a review of the arrangements before the end of the construction period so that any reasonable continuing provisions can be put in place.
- 1.11.43 The size of the Fund has been informed by reference to national precedents for spending in designated areas and by the scale of the area of benefit and it is considered that it will enable a significant contribution to be made towards mitigating the residual landscape and visual impacts of Sizewell C but also conserving and enhancing the AONB, its setting and the wider East Suffolk landscape.