



The Planning Act 2008
Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 10 – *12 October 2021*

East Suffolk Council comments on Deadline 9 submissions from the Applicant

20026200 East Suffolk Council

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Introduction

This submission at Deadline 10 provides ESC's comments on selected submissions made by the Applicant at Deadline 9.

6.13 Additional Ecology Survey Report (September 2021) - Revision 1.0 [\[REP9-004\]](#)

Pg. No.	Section Ref.	Relevant text / illustration	Observations and concerns	Requested:
6	1.1.2	<i>Final update of this report.</i>	It is noted that a final version of this report will not be available until after the completion of the September 2021 surveys. We will therefore not be able to make full comments on these results as part of the examination process.	N/A

9	4.1.2	<i>Results.</i>	It is noted that the thresholds for further triggering surveys have been updated from Report 1 (removal of the '100 passes' criteria and modification of the '10 observed passes' criteria to '10 or more passes'). ESC has no objection to this as it appears to result in stricter criteria than previously.	N/A
13 - 25	4.2 to 4.4	<i>Results Tables.</i>	Whilst the inclusion of the results tables for the crossing points which had results above the thresholds for further survey are welcomed, the inclusion of the results tables for the crossing points which did not pass the thresholds would be of assistance so that comparisons can be made between the crossing points.	Provide results tables for all of the crossing points to allow for effective comparison of all of the survey points (this could be reviewed by the Ecology Working Group).

8.1 Main Development Site Design and Access Statement - Main Development Site Design and Access Statement - Tracked Changes Version - Part 1 of 3 - Revision 3.0 [\[REP9-006\]](#)

As far as ESC understood previously, the Applicant advised the Examination that the final version of the MDS Design and Access Statement would be submitted at Deadline 9. However, the list of Deadline 9 documents appended to the cover letter to the Panel of 30 September refers to this version of the DAS simply as Version 3. It is expected that a final version will be submitted by the Applicant at Deadline 10.

Page 11, paragraph 1.3.9 – ESC welcomes the additions to the list of buildings that will have their detailed designs submitted to ESC for approval including the sky bridges, main access building and the relocated facilities administrative buildings.

Page 24, paragraph 2.4.11 (Suffolk Heritage Coast) – ESC notes that the NPPF paragraph reference to Heritage Coasts cited here is out of date (NPPF February 2019) - this should be updated throughout to reference the July 2021 version.

Page 24, paragraph, 2.5.1, paragraph 2.4.13 and page 25, Figure 2.3 Landscape and Seascape designations – these paragraphs, the associated figure, and its key, still include reference to, and show Special Landscape Areas and describe their local designation – this needs to be removed.

Page 70, Table 3 Detailed Built Development Principles – Within Main Platform – Principle 56 (Turbine halls/operational service centre) – ESC welcomes the additional clarification provided and the amplification to confirm that consultation will take place with the AONB Partnership and National Trust prior to ESC taking discharge responsibility following the Design Review Panel process confirmed in the Deed of Obligation signed by ESC and submitted at this deadline by the Applicant.

Page 70, Table 3 Detailed Built Development Principles – Within Main Platform – Principle 57 (Interim spent fuel store) – ESC welcomes the additional wording which requires the Applicant to have regard to the AONB.

Page 71, Table 3 Detailed Built Development Principles – Within Main Platform – Principle 64 (Building Finishes) – ESC welcomes confirmation that the colour palette for the reactor stack will be discussed and agreed with ESC.

Page 71, Table 3 Detailed Built Development Principles – Within Main Platform – Principle 80 (Main access building) – ESC welcomes confirmation that Reserved Matters will include an explanation of how the design and colour choice for this building have responded to its function and setting.

8.1 Main Development Site Design and Access Statement - Tracked Changes Version - Part 3 of 3 - Revision 3.0 [\[REP9-010\]](#)

Page 242, Appendix A, Accommodation Campus – Table A.1 Key Design Principles – Principle 13 – ESC welcomes the new principle that confirms that the building colour palette will be discussed and agreed with ESC with reference to the AONB Partnership's colour guidance.

8.3 Associated Development Design Principles - Tracked Changes Version - Revision 5 [\[REP9-012\]](#)

Pages 4-5, Table 2.1 General Design Principles – Principles 4 and 5 – ESC welcomes the addition of more specific wording regarding existing and proposed landscaping and the removal of 'appropriate' and replacement with specific reference to control documents or plans.

Page 8, 3.1 Northern Park and Ride – Site Specific Design Principles – Landscape Design Principles 6 and 7 – ESC welcomes the additional wording regarding the retention of legacy landscaping works where agreed with the landowner. These additions are to existing principles in relation to new and supplementary hedgerows – ESC assumption is that ‘legacy landscaping works’ relates to the hedgerows.

Page 13, 3.2 Southern Park and Ride – Site Specific Design Principles – Sustainability Principle 2 – This principle has been amended with respect to electric vehicle charging spaces, which is welcomed.

Page 20, Table 3.4 Two Village Bypass – Site Specific Design Principles - Landscape Design Principle 9 – ESC welcomes the addition of a new principle with reference to acoustic screening and the avoidance of detrimental effects on landscape, heritage, and ecology by its inclusion as part of the Two Village Bypass landscape proposals. ESC understands that the Applicant is discussing such proposals with Interested Parties at Farnham Hall and elsewhere along the route. ESC has not seen any detailed landscape proposals. ESC welcomes the inclusion of this wording, as acoustic screening – either by way of fencing or bunds – has the potential to have adverse setting impacts with respect to the Grade II listed Farnham Hall and its associated group of buildings. A footnote (2) to this new principle confirms that ESC will be consulted on the development of acoustic measures; and that ESC will decide upon the final submitted landscape design proposal that will include them. ESC welcomes this reassurance that ESC will be consulted on acoustic measures and have control over what may have been agreed elsewhere between the Applicant and Interested Parties.

Page 25, Table 3.5 Sizewell Line Road – Site Specific Design Principles - Landscape Design Principle 9 – The same comment above on acoustic screening also applies to the Sizewell Link Road.

9.112 SZC Co. Response to Request for Further Information at Deadline 9 - Revision 1.0 [[REP9-021](#)]

Page 24, Historic Environment and Landscape – Upper Abbey Farm – Mitigation and Enhancement – Further detail is provided here regarding the intended works to the heritage assets at Upper Abbey Farm that form part of the overall EDFE Estate, including confirmation of works to stabilise and enhance structures (some are in a state of semi-collapse), and the removal of intrusive vegetation. ESC considers these works to be enhancements that are intended to offset or mitigate what the Applicant calls here the loss of significance through changes to the setting of these buildings during the construction phase. ESC assumes that this is a reference to impacts arising from the adjacent accommodation campus, and also permanent infrastructure that will be constructed at the Upper Abbey Farm site. ESC considers there will be some loss of significance from some of these changes, but it will be partial. ESC does not have any concerns about permanent adverse impacts.

9.117 Sizewell C Desalination Plant Air Impact Assessment – Revision 1.0 [\[REP9-026\]](#)

The Applicant has demonstrated that NOx and SO2 impacts can be screened out, as the generator contribution plus background is <75% of the critical level objectives. ESC consider this acceptable.

ESC understands that the additional temporary generators will be regulated by the EA and subject to the EA's permitting regime which itself will require environmental impact assessment. ESC notes that the EA is content that the assessments undertaken by the Applicant to date are adequate for the purposes of the DCO, without prejudice to the EA's separate permitting decision. ESC agrees that the assessment of air quality impacts is adequate. Subject to the controls in the Construction Method Statement [\[REP8-054\]](#) and the CoCP [\[REP8-082\]](#), ESC does not dispute the findings of the ES addendum [\[REP7-030\]](#) and the assessment of air quality impacts on designated habitats [\[REP9-026\]](#). However, the generator's NH3 contribution is greater than 1% of the critical level so we expect the Environment Agency to consider this further at the permitting stage.