

## **Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)**

### **Application by EDF Energy (the Applicant) for an Order granting Development Consent for the Sizewell C Nuclear Power Station (the Proposed Development)**

#### Concerns relating to likely adequacy of application documentation

We (the RSPB and SWT) understand that EDF have submitted the application for the Sizewell C project. Like others, we are concerned about the timing of this application, as proceeding with this in the midst of a public health crisis is likely to impact the ability of the public and many organisations to properly scrutinise the plans.

We are also extremely concerned that critical environmental information is missing or inadequate and that this must be rectified before the examination starts.

We are very concerned that the information provided will not be sufficient to fully and robustly assess all possible impacts of the application on neighbouring designated conservation sites and their habitats and species<sup>1</sup> as well as biodiversity in the surrounding area more generally.

We are grateful to the Applicant for the series of pre-application public consultations it has run. However, in response to the most recent public consultations<sup>2</sup>, we raised concerns about several potential environmental impacts where critical underpinning evidence was missing or inadequate, resulting in the Applicant's assessments not being robust.

Given the short amount of time since these consultations (and the data gaps we identified), we are concerned that these issues could not have been resolved in the material submitted as part of the application, if that application was made imminently. Therefore, there is a high risk that that material will be inadequate, and it will not be possible to properly assess the application for all its potential impacts on protected sites and species and biodiversity in the surrounding area.

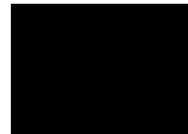
We value the NSIP system being front-loaded, to try and ensure such issues as inadequate environmental information are resolved during the pre-application process, and that any unresolved issues are fully addressed in the application documents. Our experience of NSIP Examinations indicates that leaving resolution of key impact assessment issues to the examination period can make the Examination process difficult for all parties, leading to delays and disruptions that the process was designed to avoid. In addition, leaving the resolution of incomplete or inadequate information to the examination process is undesirable especially if new information is then submitted. This results in a great deal of pressure on Interested Parties during what is an already challenging timetable. Given the likely size and complexity of this application, this would be a serious concern.

We are therefore writing to respectfully request that the application is carefully considered to ensure that all the necessary information and evidence to inform the required environmental assessments is included, and if this should not be the case, acceptance of the application declined until such information has been provided.



Julian Roughton

Chief Executive, Suffolk Wildlife Trust



Adam Rowlands

Suffolk Area Manager, RSPB

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<sup>1</sup> Specifically, the Minsmere-Walberswick Heaths and Marshes SSSI, the Minsmere to Walberswick SPA, the Minsmere/Walberswick Heaths and Marshes SAC, the Minsmere/Walberswick Heaths and Marshes Ramsar site and Sizewell Marshes SSSI

<sup>2</sup> The Stage 3 Consultation closed in March 2019 and Stage 4 Consultation closed in September 2019