Notice of Application to make a Non-Material Change to the Development Consent Order for the Sizewell C Nuclear Generating Station order 2022

Response from

THEBERTON AND EASTBRIDGE PARISH COUNCIL (TEPC) IP: 20026558

MINSMERE LEVELS STAKEHOLDERS GROUP IP: 20026696 and

STOP SIZEWELL C IP: 20026489

We rely on the Office for Nuclear Regulation and Environment Agency to comment on Change 3 (flexibility in the siting of the Intermediate Level Waste Store). For changes 4 through 8, we rely on and support the appropriate statutory authorities such as Suffolk County Council and the Marine Management Organisation to comment on the changes and clarifications and have no other objections or comments to make on these proposals.

Whilst, in principle, we approve of change 1 to create and operate an Integrated Reinforcement Yard (IRY) at the land East of Eastlands Industrial Estate (LEEIE), we have concerns that the assessment of some impacts on the wider area surrounding underplays the impact of the change.

We are also concerned about change 2 and the significant impact of operating the rail line into the Ancilliary Construction Area (ACA) on the residents of Leiston as well as road users on the B1122 and the potential additional impact of having two operating level crossings on the B1122. We also agree with Suffolk County Council's statement that;

> *"Overall, based on the evidence provided, the County Council queries whether additional effects may arise that were not assessed in the Development Consent Order application or during its examination. The potential new effects are particularly perceptible with regards to Change 1 and Change 2. Therefore, the County Council invites the Secretary of State to carefully consider whether, when taken together, some of the changes proposed in this NMC may give rise to effects* ***that are materially different*** *from the effects that have been assessed to date."*

Further details of our concerns for changes 1 and 2 are given below.

The Planning Act 2008 gives guidance relating to changes to Development Consent Orders and states:

> "*The potential impact of the proposed changes on local people will also be a consideration in determining whether a change is material. In some cases, these impacts may already have been identified, directly or indirectly, in terms of likely significant effects on the environment. But there may be other situations where this is not the case and where the impact of the change on local people and businesses will be sufficient to indicate that the change should be considered as material. Additional impacts that may be relevant to whether a particular change is material will be dependent on the circumstances of a particular case, but examples might include those relating to visual amenity from changes to the size or height of buildings; impacts on the natural or historic environment; and impacts arising from additional traffic.*"
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> Also:
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> "*The summary in the notice of the main elements of the application should describe the changes sought to the project in clear, accessible, and non-technical language. Documents, plans and maps that are made available for inspection should provide clarity on the change being sought. If the change is technical in nature, applicants should consider providing a non-technical summary of any documents to be made available for inspection. Applicants should also consider providing with these documents a statement setting out why they consider the changes proposed in their application are non-material."*

1. Concerns regarding change 1 and whether the requested change is non-material

1.1 Change 1 proposes a significant variation from the consented 400-caravan park on the Ancillary Construction Area (ACA) to provide worker accommodation, to an Integrated Reinforcement Yard (IRY), with a very large industrial building over 340 metres long and 65 metres wide, together with numerous other buildings (see diagram in Annex B, page 133 of 215, Figure B-1) in EN010012-000694-Environmental Compliance Report (Rev 1.0).pdf. It is noticeable that para 4.2.7 (page 10/215) shows the floor dimensions but not the height. The height would enable interested parties to have a better understanding of the visual impact such a large structure will have on the surrounding environment, especially as it will sit at the top of a hill overlooking the Wild Aldhurst site.

1.2 This change also includes a transfer of workshops, envisioned in the DCO approval as being located on the TCA, and a 60 bay HGV Trailer Park, presumably for transporting finished steel reinforcement cages and/or storing road-based deliveries of straight steel prior to use.

1.3 Despite assurance about noise levels from this facility, is still relatively close to several residential properties and also adjacent to the new compensation habitat at Wild Aldhurst nature reserve and will increase ambient noise levels and increase light pollution compared to the original proposed use as a caravan park.

1.4 Proposals to work 24/7 at the IRY will increase noise and disturbance compared to the original caravan park proposal which are inappropriate, so close to residential properties in Leiston and Wild Aldhurst.

1.5 We fully support Leiston Town Council's concerns about the impact on Leiston residents

1.6 Whilst the original Environmental Statement considered Sizewell Marshes and Minsmere habitats, amongst others, the Aldhurst Farm (Wild Aldhurst) compensatory habitat was not considered in the DCO submission as it was at a very early stage of establishment.

1.7 Wild Aldhurst should now be considered fully, as with any wildlife site, in the same detail as for the aforementioned wildlife sites examined in the DCO, before any approval is given. SZC have been very proud of the fact that a Marsh Harrier breeding pair has been recorded on the site so any disturbance of the site will risk the value of Wild Aldhurst as appropriate compensation habitat in the original DCO approval.

1.8 Consequently, we believe that the requested change of use of the north-eastern section of the LEEIE from a caravan park to and Integrated Reinforcement Yard should be considered as a Material Change to the DCO rather than Non-Material Change and that further work on changes to the Environmental Statement and appropriate socio-economic and amenity impacts should be investigated in more detail.

2. Concerns regarding change 2 and whether the requested change is non-material

2.1 Change 2 would enable the continued and simultaneous use of the ACA railhead facilities at the LEEIE, in addition to the railhead facilities at the Temporary Construction Area ("TCA"). This significantly departs from the original DCO approval to only use this railhead whilst the Green Rail route into the Temporary Construction Area (TCA) was under construction during the "Early Years", expected to be two or three years from DCO commencement.

2.2 It would significantly extend the period of use of this rail line through Leiston, which passes within a few feet of the gardens of residential properties in Leiston.

2.3 Whilst some residents on the B1122 in Theberton and Middleton have been the beneficiaries of mitigation schemes for noise and potential vibration due to the enhanced traffic through the village on the B1122, and Eastbridge residents have the benefit of the Property Price Support Scheme mitigation, the residents close to the rail line that will be used for these deliveries are not eligible for any mitigation schemes in the approved DCO or in this change as currently set out.

2.4 Whilst the addition of scheduling deliveries of tunnel segments and steel into the ACA on this branch of the Leiston rail line will not increase the overall rail paths through Ipswich and down the East Coast Line through Woodbridge and Saxmundham, it will require daytime closures of the level crossing on the B1122 close to Westward Ho which was not previously envisaged in the DCO application. Without careful management this could result in both the green rail route level crossing and Westward Ho level crossing being closed at the same time and disrupting local diversion routes into and from north of Leiston. Such simultaneous closures should be explicitly forbidden in any approval.

2.5 It is also clear that whilst overall HGV movements to the ACA and TCA will reduce as a result of this change of strategy for steel reinforcing, there will be an increase along Lovers Lane to the TCA entrance on Lovers Lane for assembled reinforcing steel works.

2.6 In the DCO the routing for remotely assembled steel reinforcing cages would have been down the A12/B1122/SLR to the main plaza roundabout and onto site. With this change, it should be made clear that the route from the IRY into the TCA should only be along Lovers Lane and into the TCA via the existing entrance on Lovers Lane and under no circumstances travel to the plaza roundabout via the B1122. We fully concur with Suffolk County Council's statement that:

> *"No additional HGVs or AILs shall use the section of Lovers Lane between the secondary access to the TCA and the MDS roundabout. Reason: Necessary for highway safety and capacity."*

2.7 Given the clear impacts on residents as set out by Leiston Town Council along with the lack of suitable mitigation schemes, the extension of the period of rail deliveries and the significant change in nature of those deliveries, we believe this change should be considered as a material change and its impact should be mitigated properly, which sadly is not currently the case in this proposal.