

Our Ref: SZC NMC
Date: 24 June 2026
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Email: [REDACTED]@suffolk.gov.uk



National Infrastructure,
Planning Inspectorate,
c/o QUADIENT,
69 Buckingham Avenue,
Slough,
SL1 4PN

By email only
sizewellc@planninginspectorate.gov.uk

Dear Sir/Madam,

Suffolk County Council response to Sizewell C Non-Material Change Application Reference EN010012

Suffolk County Council ("the County Council") were consulted by Sizewell C Ltd ("SZC") on 12 May 2026 with a consultation end date of 19 June 2026, however, we note that the Planning Inspectorate's ("PINS") website indicates a deadline of 24 June 2026.

On 18 May 2026, the Planning Inspectorate published the Non-Material Change ("NMC"). There are eight broad changes proposed, presented by SZC as each and collectively being non-material when compared with the made Development Consent Order,¹ which in summary consist of the following (further elaborated in SZC's notice of the NMC):²

Change 1: Use of park of the Land East of Eastlands Industrial Estate as an Integrated Reinforcement Yard ("C1").

Change 2: Simultaneous use of rail facilities at the Land East of Eastlands Industrial Estate and the Temporary Construction Area ("C2").

Change 3: Flexibility in the siting of the Intermediate Level Waste Store within the Main Development Site ("C3").

Change 4: Public Rights of Way – Sizewell Link Road, Two Village Bypass and Main Development Site ("C4").

Change 5: Clarification of Approved Departures from Certified Control Documents ("C5").

Change 6: Refinement of the Traffic Regulation Order Power ("C6").

Change 7: Deemed Marine Licence – Effect of Variants ("C7").

Change 8: Drafting Correction to the Order ("C8").

¹ [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-000691-Application%20Report%20\(Rcv%201.0\).pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-000691-Application%20Report%20(Rcv%201.0).pdf)

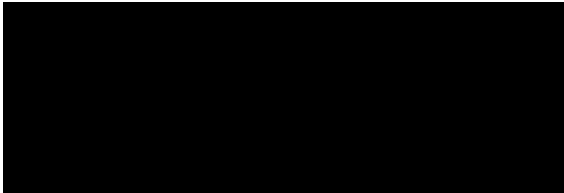
² <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-000691-NMC%201%20Copy%20of%20Notice.pdf>

This representation sets out below comments on the individual elements of the Non-Material Change (NMC) application, with the County Council only specifically commenting on areas within its remit as currently contained within the Sizewell C (Nuclear Generating Station) Order 2022 ("DCO"). The comments primarily relate to Highways/HGV impacts, Public Rights of Way, and the Construction Method Statement. These detailed comments can be found in **Appendix A**.

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.

I trust that this information is helpful and, if there are any questions regarding the content of the County Council's response, please get in touch via the contact details at the top of the letter.

Yours faithfully,



Development Manager
Suffolk County Council

Appendix A Detailed comments on the 8 Changes of the NMC application

Change 1

It is not stated by SZC whether there will be an increase in heavy goods vehicles ("HGVs") and abnormal indivisible loads ("AILs") using Lovers Lane to link to the Ancillary Construction Area ("ACA") to the Temporary Construction Area ("TCA"), or if access is needed to the Sizewell B entrance. If the Secretary of State ("SoS") is minded to approve this change, we request that the following is included:

- a) Prior to the commencement of use of the Integrated Reinforcement Yard, the access off Lovers Lane into the ACA (Work No. 1A(hh)) and the secondary entrance to the TCA (Work No. 1C(b)) shall be completed to the satisfaction of the Highway Authority.

Reason: Necessary for highways safety and capacity.

- b) 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.

Subject to confirmation from SZC of the number of HGV movements and size of movements using Lovers Lane between the ACA and TCA, the County Council reserve the right to request additional funding from SZC to protect the County Council against funding the repair of damage to Lovers Lane due to additional traffic. This is noting that the fabric of this section of highway has already been weakened by installation of underground services necessary to facilitate the development of SZC.

In addition, although not within the technical remit of the County Council, it is noted that East Suffolk Council has had serious concerns in relation to the assessment of noise in relation to the Integrated Reinforcement Yard. The County Council defers detailed comments on this matter to East Suffolk Council and supports their position and sentiment in relation to the protection of residential and environmental amenity.

Change 2

The information provided by SZC does not quantify how the simultaneous use of the railheads will affect all road users, not only close to the LEEIE, but throughout Leiston and the level crossings. It must be recognised that any noise impact predictions should be worst case scenario i.e. include the maximum level of HGV movements within the cap and simultaneous operation of both railheads.

Although not within the technical remit of the County Council, we defer detailed comments on this matter to East Suffolk Council and support their position and sentiment in relation to the protection of residential and environmental amenity.

Change 3

The County Council has no comment.

Change 4

The proposed changes to the Rights of Way (ROW) plans to ensure that they are accurate, complete and reflect the agreed highway designs are generally welcomed. This should negate the need to make legal orders in the future.

However, the County Council has not been provided with the evidence that these changes match the approved designs; it is hoped this exercise has been conducted by SZC in the background in order to revise the locations of DCO points.

Therefore, the County Council request that SZC share geospatial dataset and a drawings series

(e.g. S278 or 100 series general arrangements) of the approved designs for the highway schemes with the DCO points and changed alignments overlaid. This is required for all the highway schemes and not just those sheets where changes have been made. This should also cover any subsequent changes which have been made during construction which may not yet have been regularised by SZC.

This would give the County Council the confidence that the ROW plans are indeed accurately aligned with the approved highway designs.

The changes to Schedule 10 and 11 and the ROW plans as described in the NMC are accepted, except for those listed below.

Main Development Site

The County Council seeks assurance that the DCO points on the ROW Plans sheets 1-3 coincide with the technically approved drawings and reflect any design changes that have occurred since technical approval of the highway designs. In particular, the DCO points around the main roundabout, PCF1/14, PCF 1/15 and PCN1/1 and PCN 1/2 (Schedule 10 Part 3)

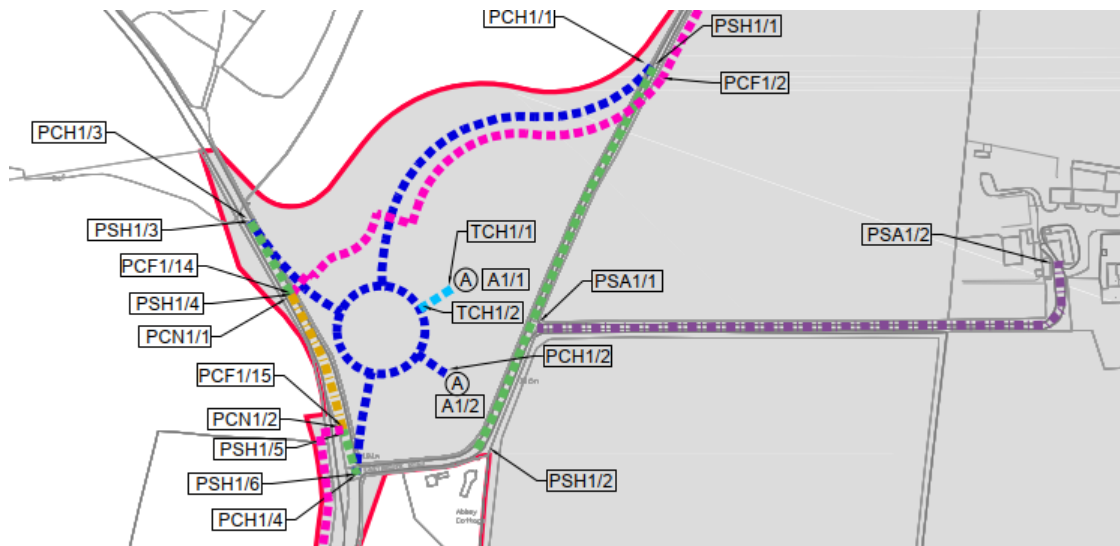


Figure 1 Extract from ROW Sheet 2 of 28

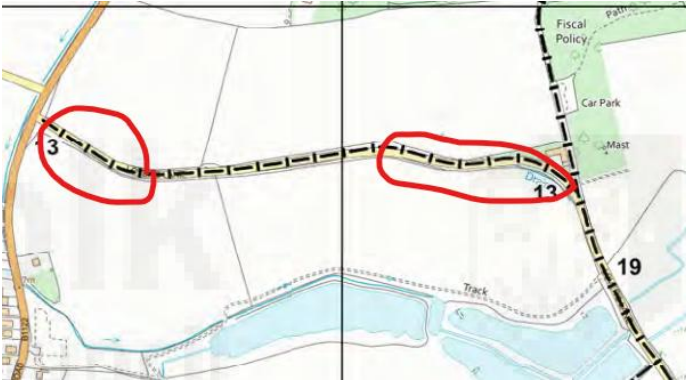


Figure 4 Extract of the Definitive Map for Leiston cum Sizewell

Sizewell Link Road (“SLR”) - West to East

There is an anomaly between non-motorised users (“NMU”) status and footpath & cycle track status.

Several minor roads will be stopped up to all traffic on the approaches to the SLR, covered in Schedule 10 Part 3 of the DCO, as a change of status from highway (all traffic) to highway (NMU), where NMU is a reference to a highway over which only non-motorised users may pass. The sections of these roads that are listed in Schedule 10 Part 1 of the DCO as stopped up, have substitutions that are listed as new highway (footpath) where footpath is clarified in Schedule 11 column (3) as meaning footpath and cycle track.

This means that equestrians and carriage drivers will have the legal right to use the NMU sections of the minor roads but no legal right to use the new routes to get across the SLR. This applies to Littlemoor Road, Hawthorn Road, Moat Road and George Road.

In Figure 5 below, the section highlighted in blue will have legal rights for NMU connecting to the substitution for the stopped up Hawthorn Road which will be footpath and cycle track, highlighted yellow.

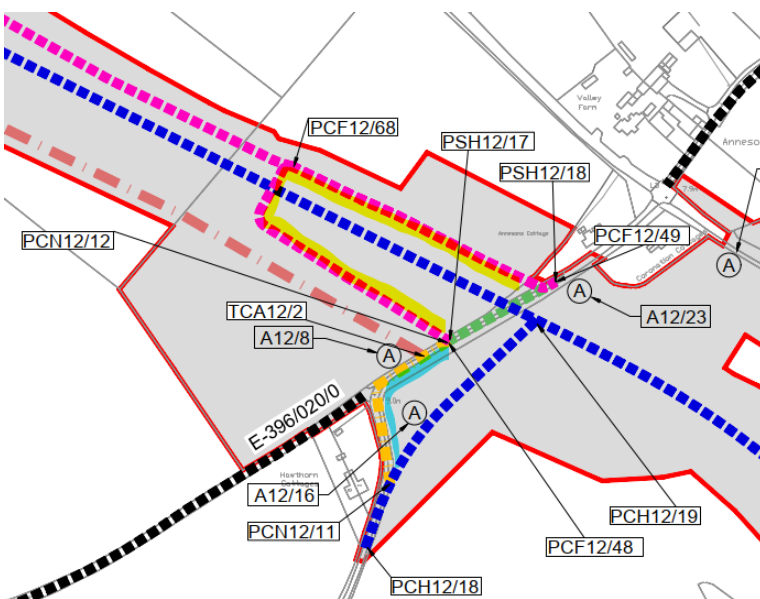


Figure 5 Extract from ROW Plan Sheet 21 of 28

ROW Plan Sheet 19 - omission from plan and schedule

To be consistent with other ROW Plans, the access track between PCF12/35 towards PCA12/2 should be shown on the plan as a joint new permanent highway (footpath) and private means of access with the same line style as is shown between PCF12/35 and PCF12/2. East of PCA12/2, this should be depicted as new permanent highway (footpath) and be included in Schedule 11 Column (3) as footpath. The extent is indicated by the green line on Figure 6.

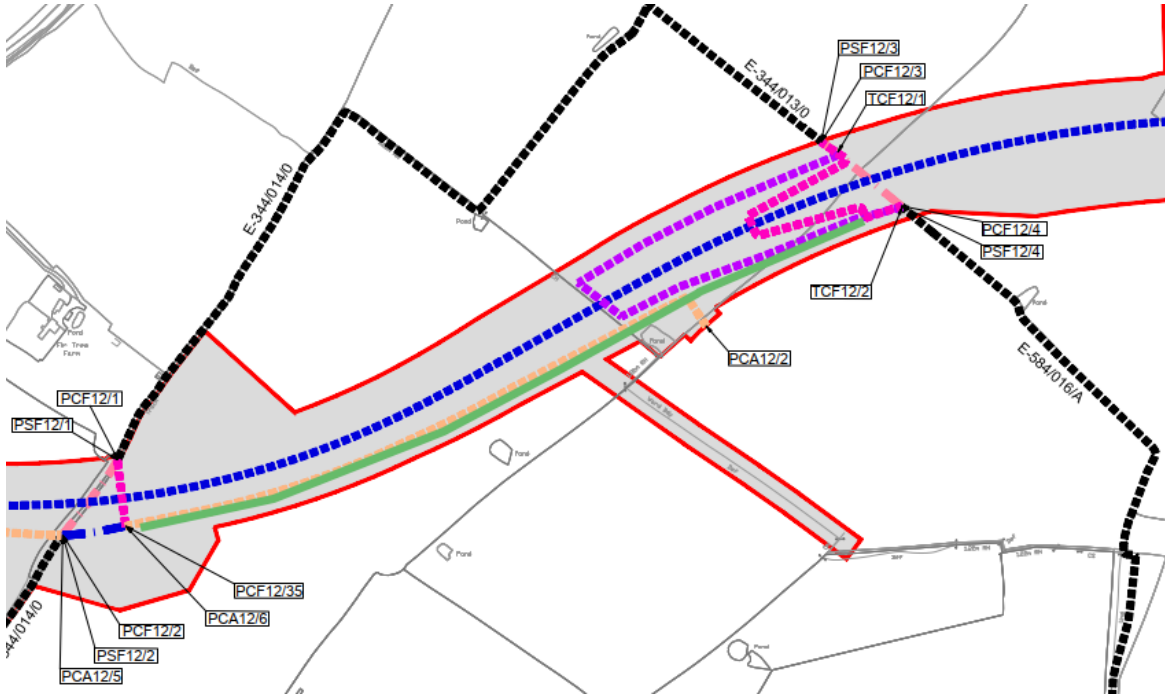


Figure 6 Extract from ROW Plan Sheet 19 of 28

ROW Plan Sheet 20 & 21 Trust Farm - omission from plan and schedule

The private access track shown on the highway designs linking Fordley Road to the Trust Farm underpass is not included on the ROW Plans sheet 20 and 21, shown in Figure 7.

Is it the intention to provide this new permanent private means of access? If so, it should be included on the ROW Plans and in Schedule 12 of the DCO as is the case for other new private access tracks.

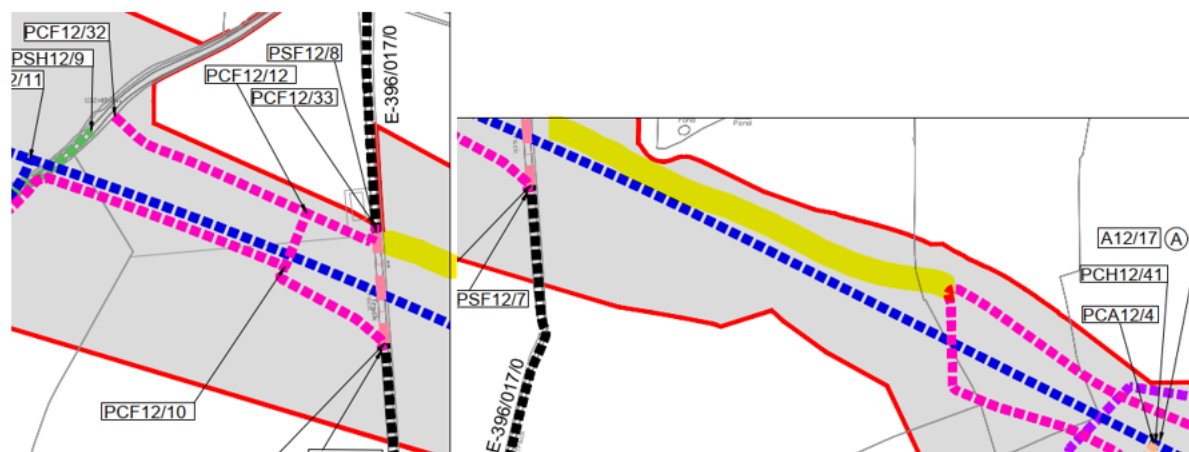


Figure 7 Extract of ROW Plans Sheet 20 & 21 with missing track highlighted in yellow

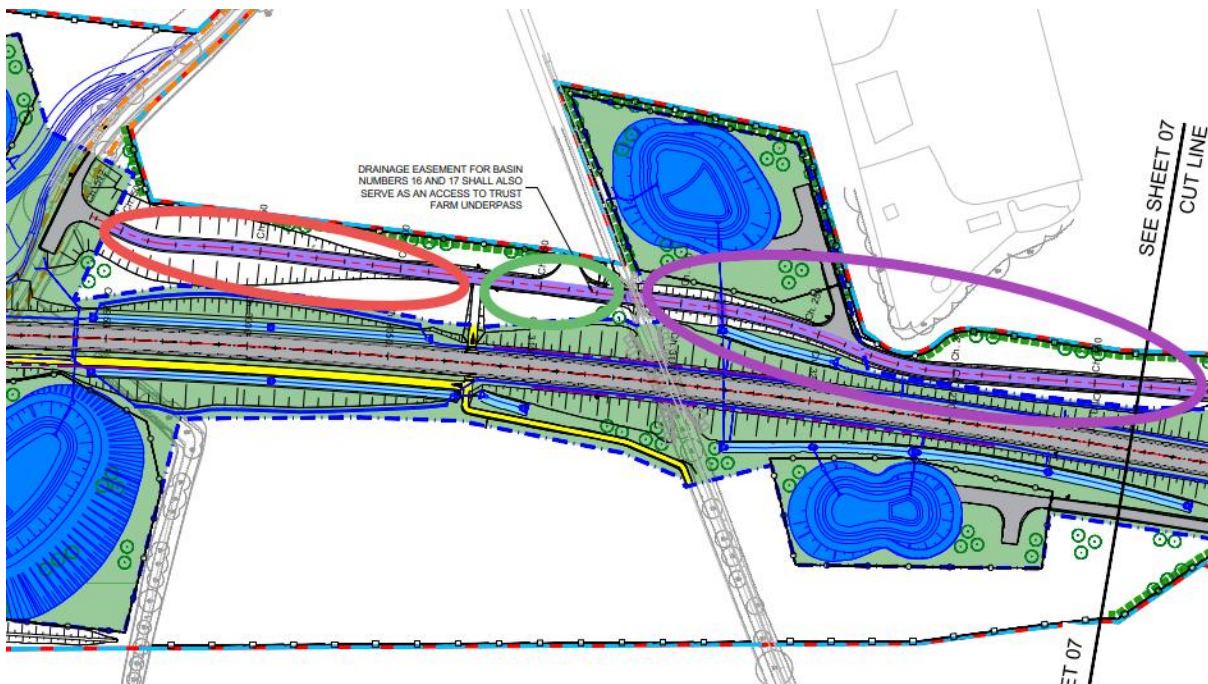


Figure 8 Extract from Approved S278 Highway Drawing

At the west end, this private access will be coincident with the NMU alternative route for Fordley Road (Figure 8 red oval), the public footpath E-396/017/0 (Figure 8 green oval) and the easement for the County Council to access the drainage basins SLR AB-16 and AB-17. The private access track (with County Council easement) then continues outside of the highway boundary to the Trust Farm underpass (Figure 8 purple oval), through the underpass shared with the alternative public footpath (Figure 8 green oval) and as a private access a short distance south of the underpass.

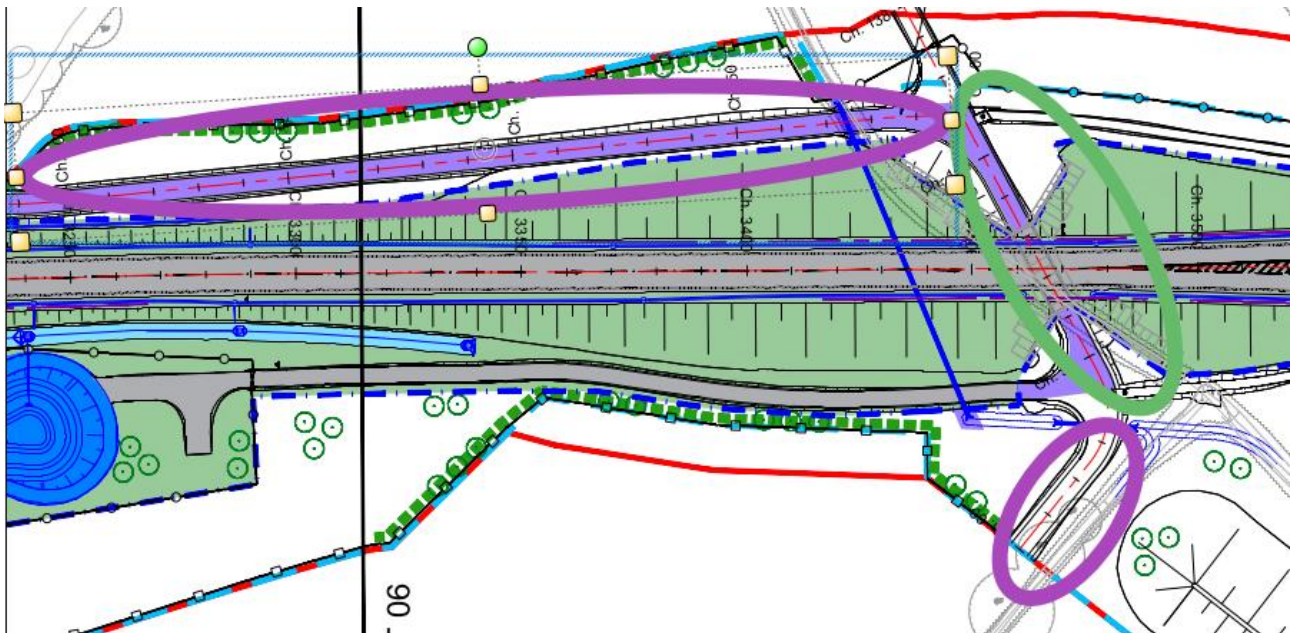


Figure 9 Extract of Approved S278 Highway Drawing

ROW Plan Sheet 21 B1122 & B1125 junction - request for amendment

Schedule 10 Column 4 substitutes new highway (footpath) between PCF 12/42, PCF 12/43 and PCF12/44 and this is listed in Schedule 11 Column (3) as footpath. However, this will result in new

footpath created on a tapering section of verge which is unusable and not satisfactory. This is shown in the black circle on Figure 11.

The County Council request that PCF12/44 is removed from ROW Plan sheet 21 and omitted from Schedule 10 Column (4) and Schedule 11 Column (3).

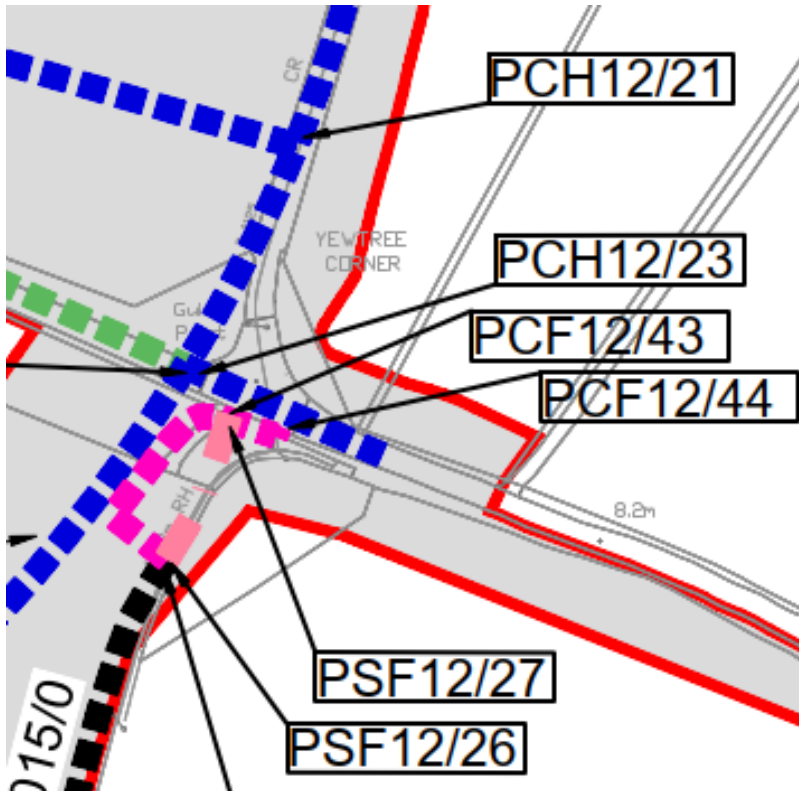


Figure 10 Extract from ROW Plan Sheet 21 of 28

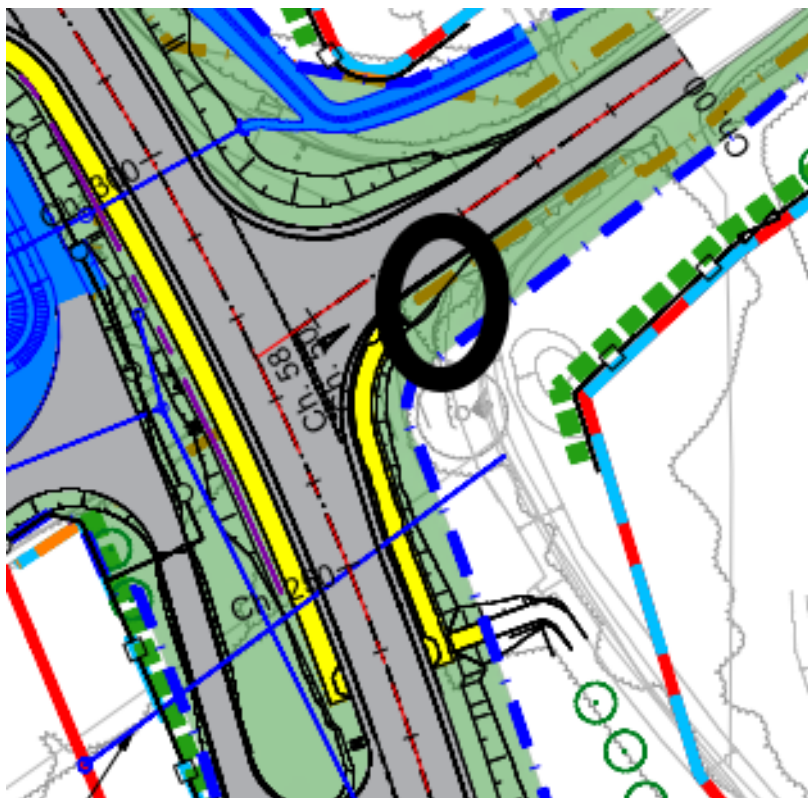


Figure 11 Extract of Approved S278 Drawing

Pretty Road Area Schedule 10 E-515/003/0 Column 4 - omission from Schedule 10

Schedule 10 Column 4 should include the section from PCF12/22 to PCF12/23 as highlighted in yellow in Figure 12 ROW Plan Sheet 22.

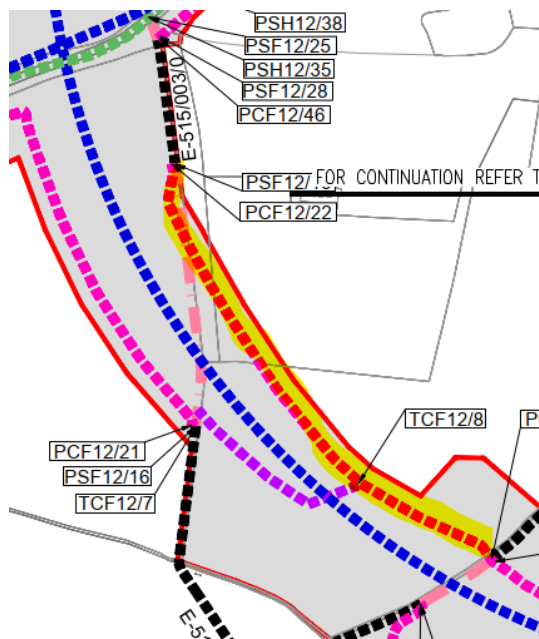


Figure 12 Extract from ROW Plan Sheet 22 of 28

ROW Plan Sheet 21 & 22- accuracy of plan

The extent of stopped up road is shorter than the new road to be substituted. For accuracy, the County Council suggest that PCH12/39 and PSH12/39 point to the same location and likewise PCH12/40 and PSH12/38. These sections circled below in blue on Figure 13.

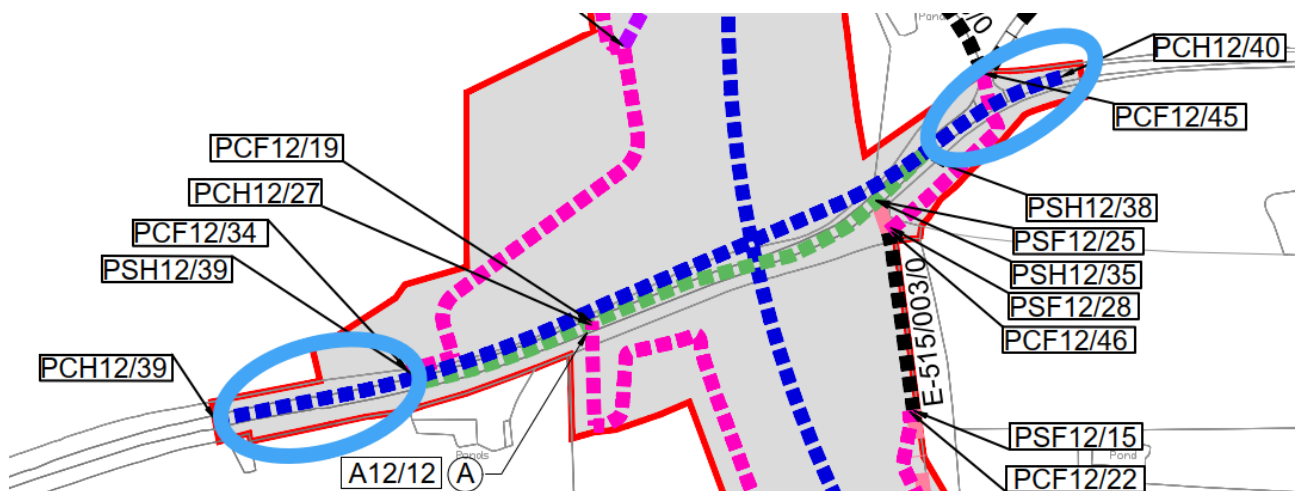


Figure 13 Extract from ROW Plan Sheet 21 of 28

Schedule 10 – Stopping up of E-396/015 and E-515/005/0 - accuracy of schedule

Schedule 10 Column (2) with reference to Highway (footpath) E-396/015 and E-515/005/0 - Column (4) does not need to include the new road over Pretty Road bridge as part of the footpath diversion.

Sizewell link road	Highway (footpath) E-396/015/0 and E-515/005/0	Highway (footpath) between PSF12/11, PSF12/12,	New highway (footpath) between points PCF12/18 and PCF12/34	Rights of Way Plans – sheet 21 of 28
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10



		PSF12/13 and PSF12/14	New highway (footpath) between points PCF12/16 and PCF12/17 New highway (all traffic) between PCH12/39, PCH12/27 and PCH12/40	
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Figure 14 Extract from Schedule 10

ROW Plan Sheet 21- request for amendment

The County Council requests that the DCO point PSF12/11 and corresponding point PCF12/18 are moved as indicated on Figure 15 by the green arrow, to enable a more intuitive design for the substituted footpath around the basin SLR AB-29 and to be further away from the wingwalls of the under-road culvert, shown in Figure 16.

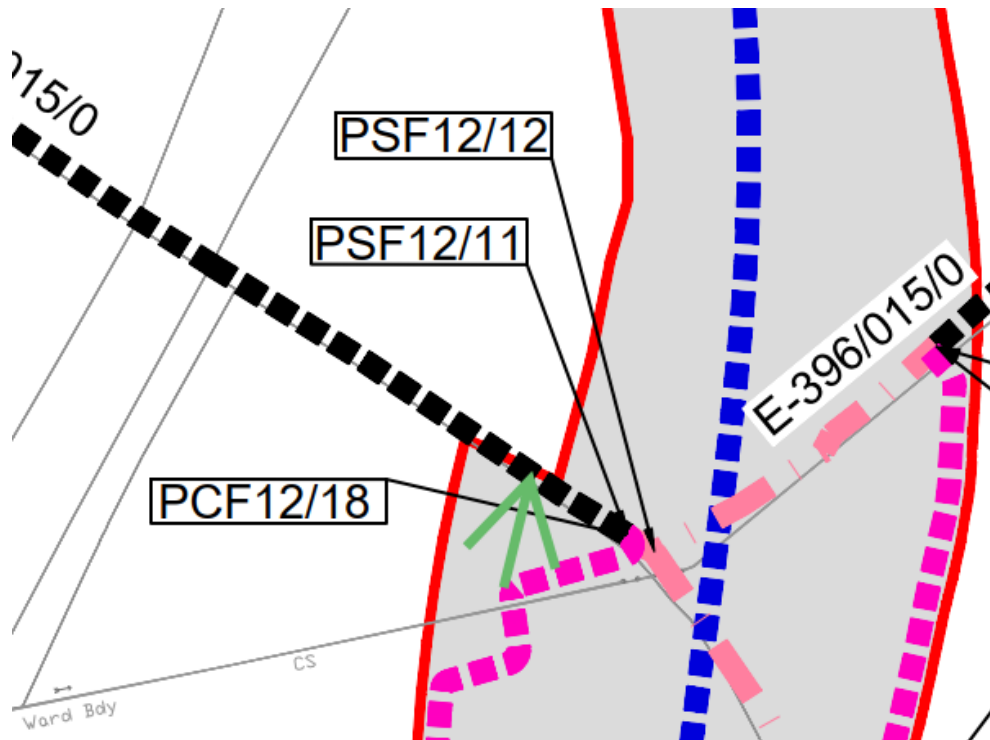


Figure 15 Extract from ROW Plan Sheet 21 of 28

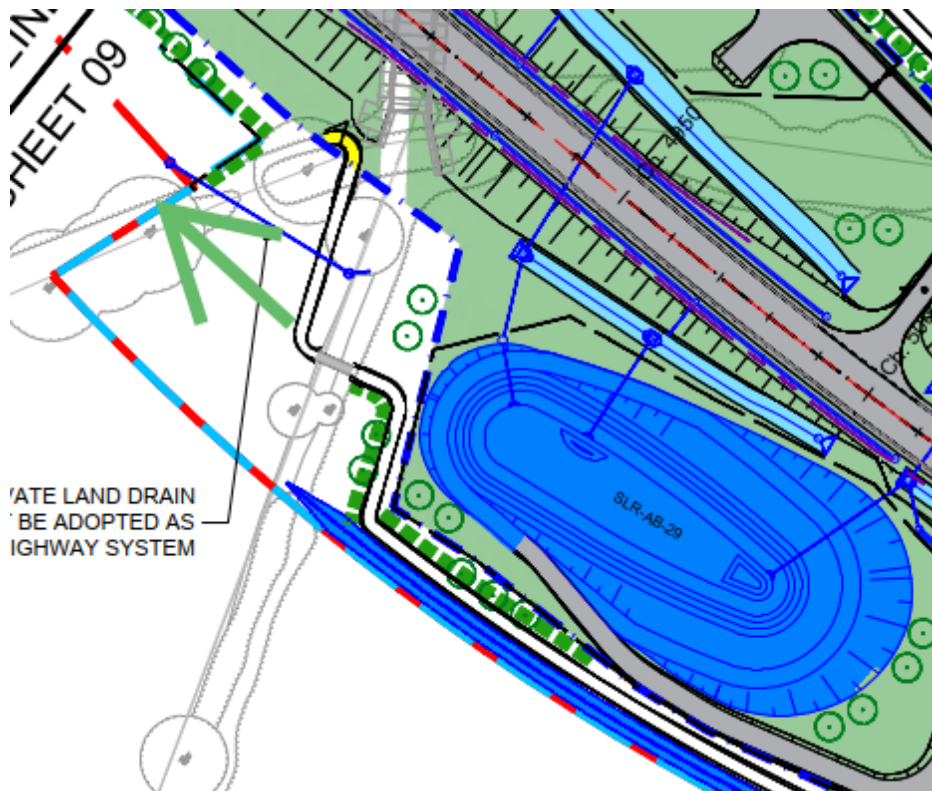


Figure 16 Extraction from Approved Highway S278 drawing

ROW Plan Sheet 22 - request for amendment

The County Council requests that the DCO points PSF12/17 and corresponding point PCF12/24 are moved south-west as indicated on Figure 17 by the green arrow to enable a more intuitive design for the substituted footpath around the basin SLR AB-34 and to be further away from the wingwalls of the under-road culvert, as shown in Figure 18.

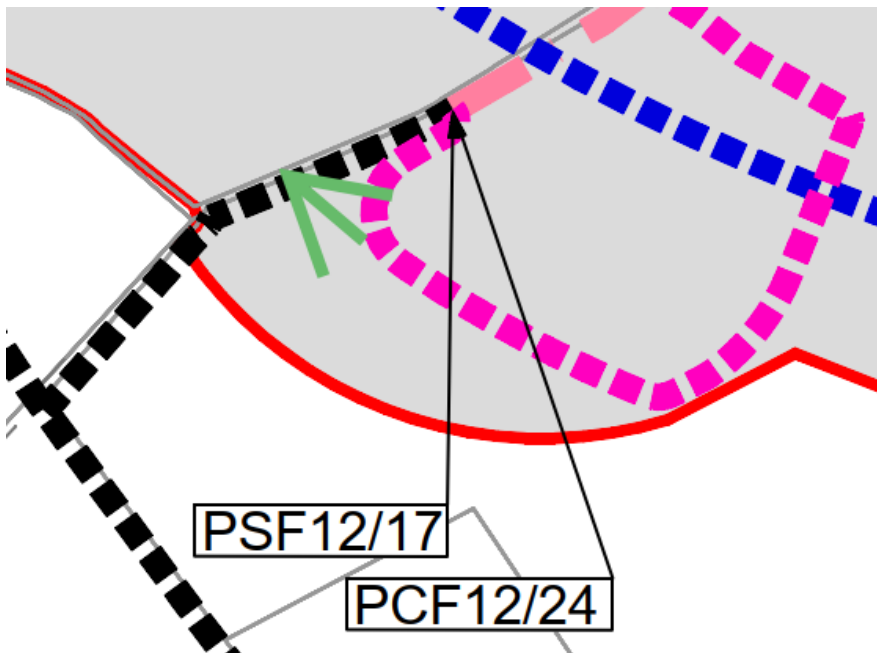


Figure 17 Extract from ROW Plan Sheet 22 of 28

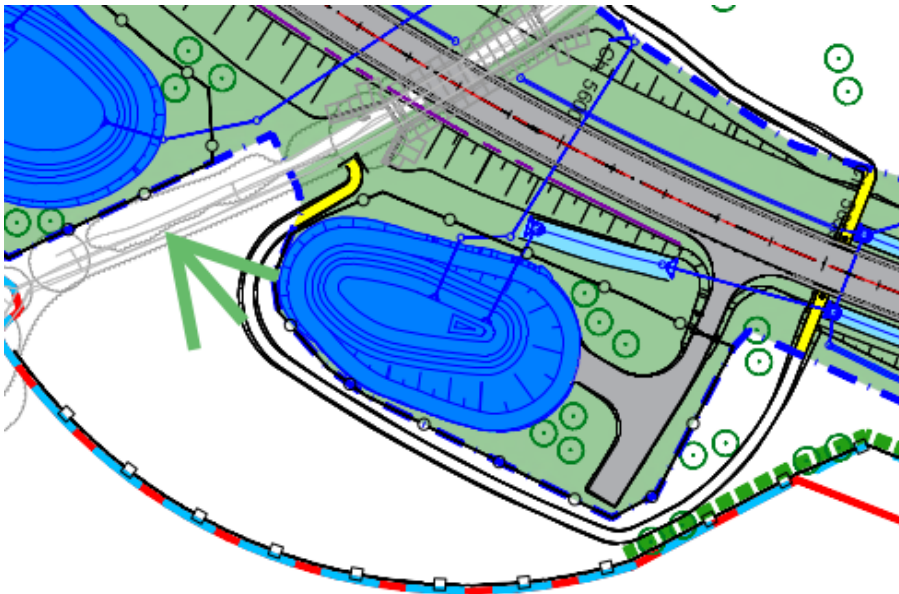


Figure 18 Extract from Approved Highway S278 drawing

ROW Plan Sheet 22 – Moat Road area

Schedule 10 Part 1 Moat Road, Column 3 - PSH 12/24 is not shown on the ROW plans and does not appear to be needed and could be omitted from Schedule 10.

Schedule 10 Part 3 PCN12/18 to PCN12/19 is created as highway NMU but PCN12/19 is not shown on the ROW Plan sheet 22.

Schedule 10 Part 3 & Sheet 22 - PCN12/22 and PCN12/23 point at the same location on ROW Plan sheet 22 but are listed as new highway for NMU in Schedule 10. This does not seem correct.

ROW Sheet 22 - Schedule 10 Part 3 changes a section of unnamed road (George Road) from vehicular traffic to NMU (from PCN 12/20 to PCN 12/21). However, compared to the highway drawing, it appears that the position of point PCN12/21 is too far south on George Road and would result in vehicle rights traffic being stopped up on a section required for vehicles.

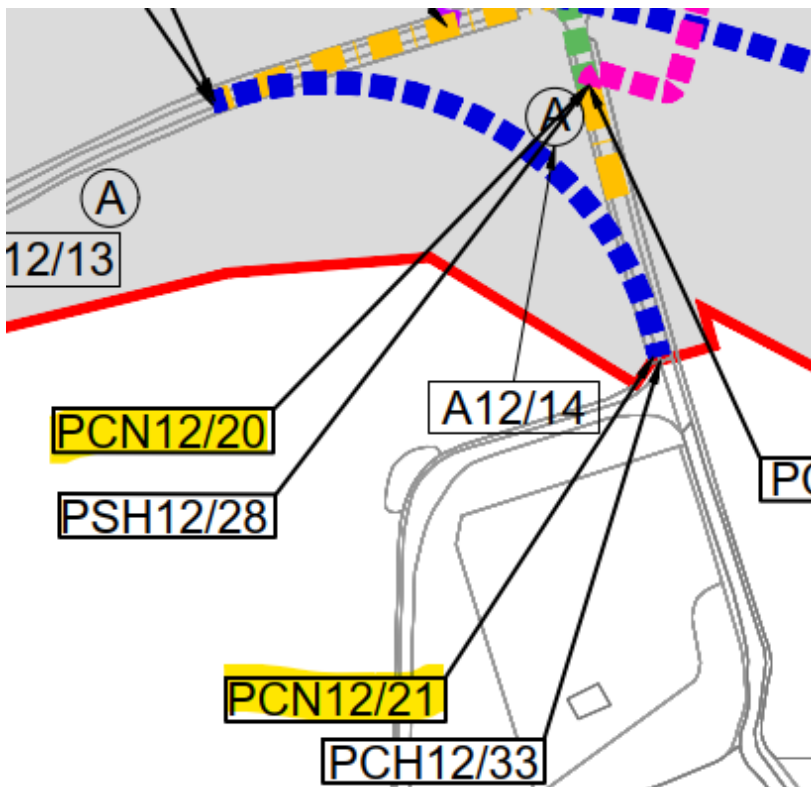


Figure 19 Extract from ROW Plan Sheet 22 of 28

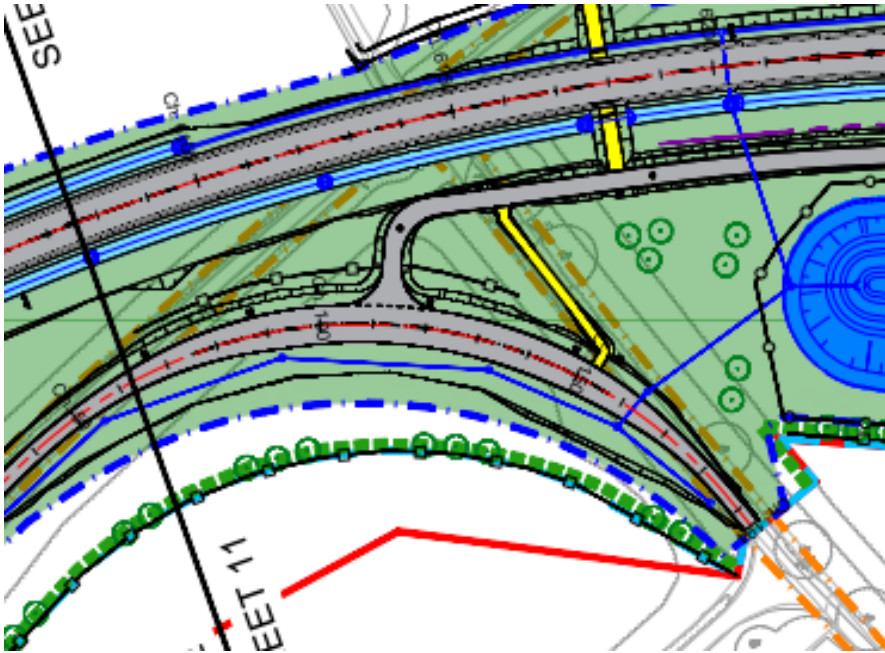


Figure 20 Extracts from Approved Highway S278 drawing

There are omissions in both the ROW Plan Sheet 22 and in Schedule 10, which results in part of Moat Road not being stopped up and an intended NMU route not legally created by the DCO, namely: -

- a) PCN12/28 is not listed in Schedule 10 Parts 1 or 3 and Schedule 11. What legal mechanism changes Moat Road to a highway for NMU from the B1122 at point PCN 12/28 to point PCN12/22? This is circled green in Figures 21 and 22.
- b) How is the section of Moat Road shown circled red in Figures 21 and 22 stopped up?

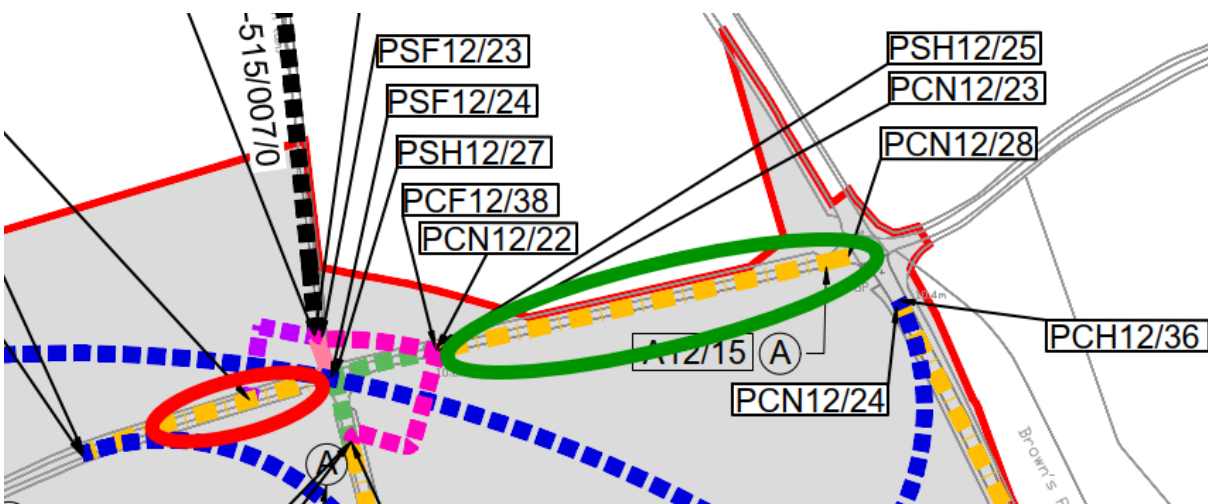


Figure 21 Extract from ROW Plan Sheet 22 of 28

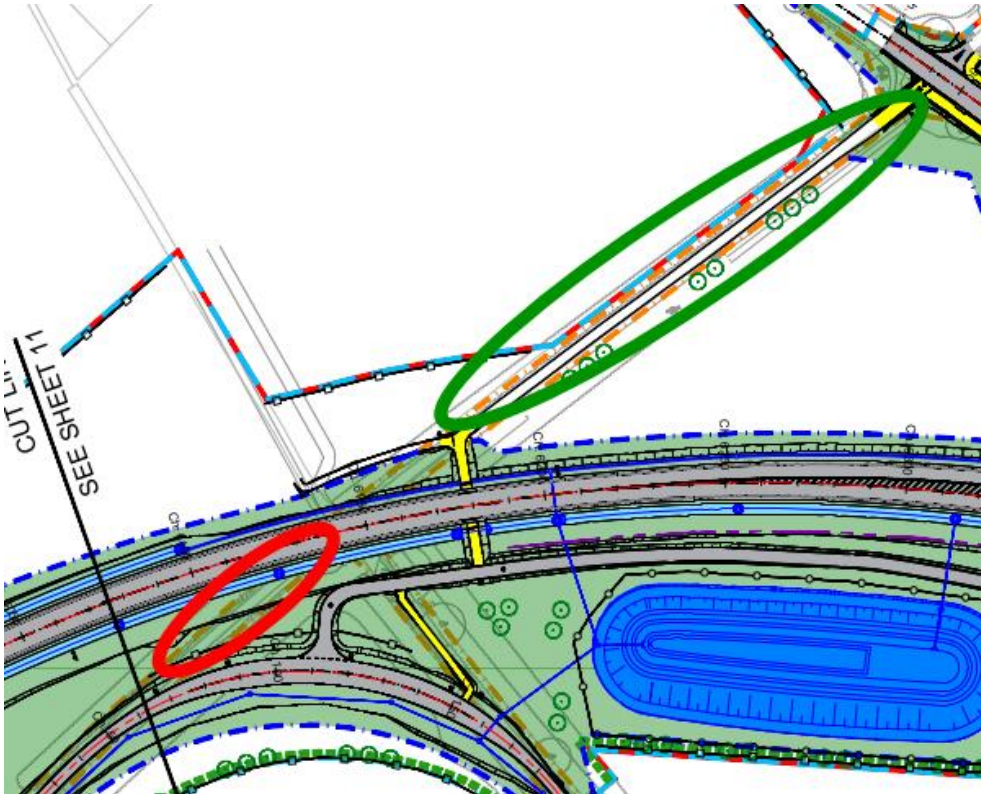


Figure 22 Extract from Approved Highway S278 drawing

Change 5

The County Council is, in principle, supportive of the proposed amendment to clarify the process for approved departures from certified control documents.

Change 6

The County Council does not agree (as stated within paragraph 3.7.5 of the Application Report by SZC) that it is “causing material delay to the project” due to the amount of traffic regulation orders (“TROs”). However, the County Council is, in principle, supportive of the proposed amendment, subject to traffic authority consent still being required.

Change 7

The County Council has no comment to make.

Change 8

The County Council has no comment to make.

Changes to the Construction Method Statement (“CMS”)

It would have been helpful to clarify whether any changes through Requirement 13 have been captured within Paragraph 1.2 (Approval process for future document updates).

Paragraph 2.1.6 is the same as present, therefore the County Council assumes the commitments remain.

It is noted that Plate 2.1 Phasing Schedule is out of date, these should be updated based on the current version of the Implementation Plan. The Freight Management Facility should also be removed.

The County Council has no objection to the proposed changes to the Land East of Eastlands Industrial Estate vehicular access onto Valley Road, Lovers Lane and King Georges Avenue as detailed at paragraph 3.5.6.

The amendment of Paragraph 3.5.8 includes reference to the route which park and ride buses must take.

For greater clarity, an additional paragraph should be included after new paragraph 3.5.8 that states: "Prior to MDS Roundabout being operational, buses must use B1122 Lovers Lane access off King Georges Avenue".

References to the Freight Management Facility have been removed from the CMS. In practice, this provision is being provided by the Orwell Logistics Park ("OLP"), which operates under a Town and Country Planning Act planning permission from East Suffolk Council. The County Council considers it essential that OLP is referenced within the CMS as this site is one of the main contributors to trip generation for the main site, particularly reversing of traffic at A12 Nacton and A12 Seven Hills junctions.

It is noted that there is no mention of the delivery and storage of tunnel segments between the ACA and TCA.

END