



Together Against Sizewell C

24th June 2026

The Planning Inspectorate

Temple Quay House

2, The Square,

Bristol

BS1 6PN

Reference EN010012

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

Together Against Sizewell C (TASC) would like to respond to the above consultation as follows:-

We refer to the following government guidance relating to changes to Development Consent Orders: '[Planning Act 2008: changes to Development Consent Orders](#)' – [GOV.UK](#).

Bullet point 16 on page 7 refers to the impact of changes on local businesses and residents – it 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.***”

Regulation 6 at Bullet point 25 on page 10 indicates a need for clarity, stating, “*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.

TASC believe that the guidance indicates that changes 1 and 2 in the application, claimed by the applicant to be **non**-material, should be considered as material changes because both the requested changes deviate way beyond what was approved in the development consent order (DCO). We also consider that the supporting documents display a lack of clarity. In TASC’s opinion, the proposed changes have been designed solely for the benefit of the project with little or no consideration for local residents and businesses – they do not reflect the disruption which will emanate from the suggested changes to the LEEIE site nor from the long term extended use of the Leiston Branch line.

Change 1. Land East of Eastlands Industrial Estate (LEEIE).

This change proposes a significant variation from a consented 400-caravan park to provide worker accommodation, to an Integrated Reinforcement Yard (IRY), including 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.

This Cut and Bend Factory (the Factory) is 3 times larger than the [REDACTED] building tested at Canvey Island, referred to in the Environmental Compliance report, so will naturally be far more impactful. Emanating light and noise from 24/7 operation, together with additional HGV movements, will clearly have a negative effect on people living in the vicinity, as well as a visual impact on the adjacent National Landscape /AONB and other designated sites. Even with the suggested screening, this building will have an adverse impact on the landscape, especially when compared with the 400 caravans that were approved in the DCO. Caravans are easily accepted in an area that is popular with tourists whereas the Factory and other buildings and structures which are part of the application will form an incongruous industrial landscape visible from the National Landscape.

The access to the site on to Lovers Lane will cause another hazard to the very busy road environment. Lovers Lane is used as the designated route for all HGVs and businesses accessing Leiston Eastlands Industrial Estate and the East of Leiston Town generally. Lovers Lane is the only road available for Sizewell A and Sizewell B traffic, visitors to the Sizewell Hall Community and Respite Centre, the Beach View Holiday Park, Sizewell village and the beach car park. Additional HGV traffic on Lovers Lane, will likely cause material adverse impacts to other users of the road be they residents, visitors or businesses.

Para 4.2.10 (page 10/215) refers to peak hourly deliveries of steel to the IRY, although does not provide clarity by providing an expected daily total. From peak deliveries of 6 HGVs per hour to the western end of the Factory and 4 to the eastern end, based on 16 hours of operation per day there could be up to 320 2-way HGV movements per day. In terms of movements from the IRY, in para 2.2.9 SZC say there are expected to be an average of 122 two-way HGV journeys per day between the LEEIE and TCA during operations. These HGVs will all have to cross Lovers Lane thereby negatively impacting residents, visitors and businesses using Lovers Lane.

This change will not only be detrimental when operational but during the construction programme deliveries to the site will include many different loads of building materials. Appendix A, para 2.2.8 (page 73/215) says construction of the IRY will add an average 16 two-way HGV movements per day (40 two-way at peak) throughout the 15 month construction. Additionally, para 2.3.8 forecasts that there would be an average of 20 two-way HGV movements per day and a peak of 50 two-way HGV movements per day and 2 AIL two-way movements per day associated with the construction of the Marine Tunnel Segment Storage (MTSS) Yard. As these will take place during the SZC 'early years', they will impact both the B1122 and Lovers Lane.

In various tables in Appendix A, the applicant claims a reduction in vehicle movements due to a reduced number of car journeys to/from the LEEIE by virtue of there no longer being a caravan park on the LEEIE. This is a misleading claim as, (i) those workers no longer lodging at the LEEIE will still have to travel on the wider network to/from their accommodation at Pakefield from/to home, (ii) there will be additional workers for construction work on the LEEIE, (iii) comparing 'vehicle movements' masks the fact that additional HGVs and AILs are far more impactful than reduced car journeys, and (iv) there are additional workers at the IRY and MTSS once operational. There would be far greater clarity if the applicant's documents had been transparent about the numbers of HGVs included in the approved transport strategy for the reinforced steelworks and marine tunnel segments so an easy comparison could be made to the revised strategy now proposed.

In the application documents SZC refer to learnings from Hinkley Point C (HPC). Para 4.2.33 mentions that less HGVs will be needed to deliver the straight steel for

processing when compared with bringing the fabricated steel to site by road transport. TASC believe that HPC are bringing the fabricated steelwork to site by way of sea transport. We have not seen evidence that SZC have assessed the alternative of fabricating the steelwork at, say, a coastal location and transporting it to site by sea. It could be a far more sustainable option to have the steelwork manufactured offsite and delivered by sea– this would obviate the need to build a large industrial complex that will only be used for a temporary period before being demolished at the end of SZC’s construction, thereby avoiding the impacts that the construction and operation of the IRY will have on the receiving environment. Details of where the marine tunnel segments and fabricated steel were expected to come from in the approved DCO and assessment of alternatives e.g. delivery by sea, would provide increased understanding of how sustainable the changes proposed are.

Para 4.4.7 makes the assumption that that the additional employees working on the operational IRY will be local – where is the evidence for that? Also, if achieved, the applicant has failed to consider the impact this may have on locals due to potential car parking issues, as many will not likely use the Park and Ride facilities. There is already an existing problem with inadequate parking on and around the LEEIE, causing parking on side streets and many other inappropriate places¹. Some SZC workers are using a shoppers’ car park for the duration of their shift and walking to the site which means the corner shop in Leiston has lost trade due to there being no car parking spaces for regular shoppers. Also, with other Sizewell workers using the free parking at the Sizewell beach car park, this is reducing the availability of parking for tourists. If the IRY and MTSS workers are to use Park and Ride facilities, where is the turning/parking space for the buses at the LEEIE?

Installation of the IRY and MTSS on the LEEIE could mean extended and increased water and sewage facilities on the proposed site and TASC believe that the application documents should be transparent in this regard. Also, the applicant claims that the DCO takes account of the possible risk of flooding. However, it would be expected that the hard standing and roofing for the IRY, trailer park and MTSS would be more vulnerable to pluvial flooding than the caravan park. TASC consider there should be an assessment of the potential impacts of pluvial flooding due to Change 1.

In TASC’s opinion, the NMC documents do not prove that the 24/7 operation will not have a significant deleterious impact from noise and light pollution and vibration on all surrounding properties and businesses, some only 110 metres from the proposed development. Many locals are not aware of these proposed changes, which flies in the face of what should be an in-depth consultation.

We submit that Change 1 is a Material Change and assessed accordingly.

Change 2 Rail use.

Page 21 States 2 deliveries per day 4 journeys.

Whereas

[EN010012-000694-Environmental Compliance Report \(Rev 1.0\).pdf](#) Page 127 6.42

states as follows:-

The intensity of use of the LEEIE railhead will reduce once the GRR is open, with only two to four trains per week using the LEEIE, instead of the two trains per day before the opening of the GRR. On those days where a train is routed to the LEEIE, there will be fewer trains using the GRR, so that the overall number of trains remains within the maximum of four identified in the RNMP.

The outcome of this discrepancy also has an effect by use of alarms on all crossing points in Leiston over a longer period of time.

There is also a cumulative effect on the B1122 from both the Green Rail route crossing and the Station Road crossing interrupting journeys between Theberton, Leiston and Aldeburgh – this will negatively impact all those passing through the B1122 rail crossings, including those accessing/leaving the Masterlord Industrial Estate, shopping facilities, the surgery, the schools, leisure facilities and emergency services.

TASC believe this is a material change as it will seriously affect all residents living in properties in close proximity to the Leiston branch rail line - which includes the new estates, Hodgsons Way and Picture House Green, in addition to Westward Ho/ Buckleswood Road , Buller Road area, Farrow Close area, Carr Avenue, Valley Road and Terrace, Archway Cottages and King Georges Avenue area.

The reason many people accepted the Green Rail Route (GRR) was that it would mean only short term use (approximately 3 years) of the Leiston Branch Line - recognising that disruption to the many citizens and properties alongside the branch line was only temporary while the GRR was being constructed.

Para 5.2.6 claims a potential reduction in HGVs due to the delivery of marine tunnel segments by rail – as mentioned above, greater clarity is required e.g. advising HGV journeys provided for in the DCO for the tunnel segments and fabricated steel (including where the deliveries were expected to come from in the DCO) and if all the tunnel segments will now be delivered by rail or are some still anticipated to arrive by road? Comparisons of just HGV and AIL changes (not skewed with car journeys which should be considered separately) would provide greater transparency and understanding.

Change 2 is a major deviation from the original DCO and as such it would be expected that residents living alongside the LEEIE railway line, including those in new housing that

were not in the DCO assessments, and businesses should be fully consulted as part of a material change.

Change 3 Main site – siting of the Intermediate Level Waste Store (ILWS)

TASC find this unacceptable as further information is required – to date we have not seen a detailed footprint plan of all facilities and buildings for the 33 hectare site. We have pointed out many times that we believe the site is NOT of sufficient size to safely construct and operate the two reactors of Sizewell C.

Buildings on the Sizewell C site need to respect the setting in the National Landscape/ AONB. Therefore, greater regard should be given to the visual impact any large intrusive building will have on this landscape. In the SZC Design and Access Statement (D&A) Part 1 (REP10-055) it says that it is important that views of the lower buildings should not obscure the view of the main buildings. Para 6.12.6 states, *“It is important to the perception of the site from distant views that the lower level supporting buildings do not interrupt views of the primary structures. This is achieved through largely screening the lower level structures by the coastal sea defences, landscaping and planting. The significant forms which comprise the power station are seen to rise out of the landform with the functional and operational base of the platform being largely unseen”*

As can be seen from the diagram below taken from page 47/105 of D&A Part 2 (REP10-56), in the DCO it was anticipated that the ILWS would be located on the western edge of the site.



However, it now appears that the ILWS could be located on the northern edge of the site, on the eastern side as that is in Zone 1A-6. That means that it could be more visible from the north potentially obscuring views of the reactor from the north – this potentially

conflicts with para 6.12.6 of the D&A Part 1. Greater clarity is required in respect of the proposed height and scale of the ILWS before adverse visual impacts can be ruled out.

Change 4 Rights of Way

We consider that the diversions, stopping up and the closing of many Highways and Public Rights of Way (PROW) has been carried out for the benefit of SZC. Not enough consideration has been given to the many people who use the facilities, cutting off circular routes and long distance rights of way with inadequate, if any, consultation with the local parishes and necessitating making changes to the Ordnance Survey maps. This has potential negative impacts on the many tourists that make use of the PROW in the areas affected and therefore another negative impact on the tourism industry/businesses.

Conclusion

We have found these Non-Material Change documents to be difficult for any lay person to decipher. The enormous upheaval the project is already causing in East Suffolk has to be seen to be believed and the proposed changes will further affect people's lives and local businesses. The changes appear to be solely in the interest of the SZC project and its development, with the applicant's apparent assumption that all these changes will be accepted by the Planning Inspectorate and the Secretary of State. TASC does not agree with the developer's conclusion that these are NON material changes (page 16, para 5.1.5), *"having regard to their scale, duration, context and the mitigation secured, those impacts are not considered to be of a kind that there would be a sufficient impact on local people and businesses for the proposed changes to be treated as material"* and we believe that our comments herewith support our view.

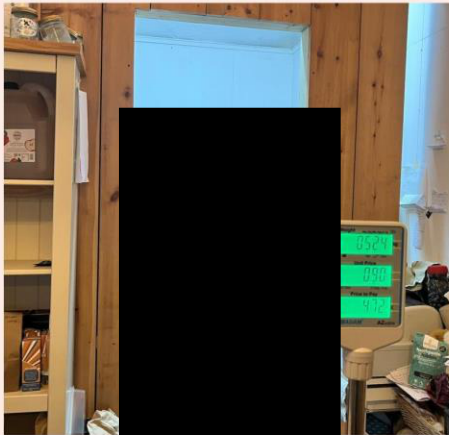
Many local businesses are already experiencing adverse impacts because of the SZC project – see the 21st April 2026 BBC article, '[Sizewell roadworks cost us thousands, say pubs](#)' and the reported East Anglian Daily Times article below, dated 24th June 2026. Such impacts were raised during the DCO examination but were downplayed by the applicant - now evidence shows that the SZC project is causing considerable damage to some local businesses.

TASC consider the impact of Changes 1 and 2 on local people and businesses are sufficient to indicate that the changes should be considered as material. They, therefore, need to be subject to in-depth scrutiny and fully assessed to ensure all potential impacts are considered.

BUSINESS



owner of Darlings Café in Leiston



owner of Refill in Leiston

Shops on the edge of closure -

Leiston high street is facing a crisis as Sizewell C roadworks, low footfall and high costs pile on the pressure.

Shopkeepers of Refill and of Darlings Café warn their businesses are at risk of closure amid the cost-of-living crisis.

Both have told customers they are teetering on the brink - with town accessibility among the issues causing major headaches for high street businesses.

"It's a bit of a perfect storm in Leiston at the moment. Everybody across the country is struggling with the cost of living with the two wars going on," says

Coupled with this, rents around the town have rocketed

SARAH CHAMBERS

as owners lease out their properties to Sizewell C workers, she says.

"It's not just Sizewell C either - there are three or four large infrastructure and energy projects going on in the area - they are all having a major effect.

"They said it would bring people to the town. They don't come into town - they have got no reason to. They don't live here. They work here and at the end of the week they go back to their families."

Other independent shops in town are also struggling. Two major retailers closed recently - further reducing town centre

footfall.

Coopers hardware shut in October 2025 and The Original Factory Shop in March this year.

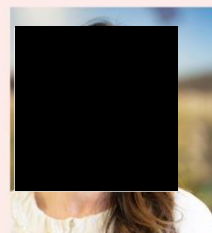
Trying to get to the town from anywhere else is "a bit of a nightmare" because of the roadworks, the worried shopkeeper adds.

This is deterring her customers from coming in from Yoxford and Darsham.

says her café business is affected by the roadworks - but also because nuclear workers aren't using the town as much as they might.

"We are really struggling at the moment. There's no footfall. We have tried literally everything - changing days, more staff, less staff," she says. "It's a nightmare."

Sizewell C workers coming into



town - who could provide her with more business - are being instructed to stay away, she says.

"They do want to come. They are getting told they should not be parking in town because locals are complaining over

Sizewell C traffic - but that's no good for us."

Customers when they do arrive are "lovely", she says, but they are not visiting frequently enough.

The café owner - who also runs Rescue Paws UK which looks after abandoned cats, dogs and other pets - went to Sizewell C to try and get help but says she received none.

"I have been here since the middle of February. We had a couple of good days and the rest of them are just dead.

"It's just trying to keep afloat. I'm probably two or three months away from saying we'll have to give up."

The mother-of-two relocated from Doncaster to Suffolk 14 years ago and moved to Leiston seven years later. Her daughter,

Together Against Sizewell C

ⁱ The [minutes of the 15th April 2026 SZC Main Development Site forum](#) references car parking problems in paras 8.02 and 8.04