The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Sizewell C Nuclear Development

Case Reference: EN010012

Adopted by the Planning Inspectorate (on behalf of the Secretary of State pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

July 2019

[This page has been intentionally left blank]

CONTENTS

1. INTRODUCTION 1

1.0 Background 1
1.1 The Planning Inspectorate's Consultation 2
1.2 Article 50 of the Treaty on European Union 3

2. THE PROPOSED DEVELOPMENT 4

2.0 Introduction 4
2.1 Description of the Proposed Development 4
2.2 The Planning Inspectorate's Comments 5

3. ES APPROACH 12

3.1 Introduction 12
3.2 Relevant National Policy Statements (NPSs) 12
3.3 Scope of Assessment 13
3.4 Confidential Information 18

4. ASPECT BASED SCOPING TABLES 19

4.1 Socio-Economics 19
4.2 Transport 23
4.3 Noise and Vibration 29
4.4 Air Quality 33
4.5 Landscape and Visual 37
4.6 Terrestrial Ecology and Ornithology 39
4.7 Amenity and Recreation 44
4.8 Historic Environment 46
4.9 Soils and Agriculture 48
4.10 Geology and Land Quality 50
4.11 Groundwater and Surface Water 54
4.12 Flood Risk 58
4.13 Coastal Geomorphology and Hydrodynamics 61
4.14 Marine Water Quality and Sediment 65
4.15 Marine Ecology 67
4.16 Marine Navigation 71
4.17 Radiological Assessment 72
4.18 Major Accidents and Disasters 75
4.19 Waste Management 78
4.20 Climate Change 80
4.21 Health and Wellbeing 82
4.22 Inter-relationships and Cumulative Effects 84

5. INFORMATION SOURCES 87

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

[This page has been intentionally left blank]

1. INTRODUCTION

1.0 Background

1.0.1 On 22 May 2019, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from NNB Nuclear Generation (SZC) (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Sizewell C Nuclear Development (the Proposed Development).

1.0.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion '*as to the scope, and level of detail, of the information to be provided in the environmental statement'.*

1.0.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled Sizewell C EIA Scoping Report: May 2019 (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.

1.0.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:

(a) any information provided about the proposed development;

(b) the specific characteristics of the development;

(c) the likely significant effects of the development on the environment; and

(d) in the case of a subsequent application, the environmental statement submitted with the original application.

1.0.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

1.0.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

1.0.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it

is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

1.0.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

1.0.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:

(a) a plan sufficient to identify the land;

(b) a description of the proposed development, including its location and technical capacity;

(c) an explanation of the likely significant effects of the development on the environment; and

(d) such other information or representations as the person making the request may wish to provide or make.

1.0.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.

1.0.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on *'the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.

1.0.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations. The Applicant's ES should therefore be co-ordinated with any assessment made under the Habitats Regulations.

1.1 The Planning Inspectorate's Consultation

1.1.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

1.1.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.

1.1.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

1.1.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.2 Article 50 of the Treaty on European Union

1.2.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a period of negotiations regarding the UK's exit from the EU. On 26 June 2018 The European Union (Withdrawal) Act 2018 received Royal Assent and work to prepare the UK statute book for Brexit has begun. The European Union (Withdrawal) Act 2018 will make sure that UK laws continue to operate following the UK's exit. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.0 Introduction

2.0.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.1 Description of the Proposed Development

2.1.1 The Proposed Development was subject to a scoping request and subsequent Scoping Opinion from the Inspectorate in 2014. The Scoping Report states in Chapter 1 that it reflects changes to the Proposed Development since 2014 and takes account of new requirements in the EIA Regulations. The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Scoping Report Chapter 3. Section 3.3 of the Scoping Report includes a description of changes to the Proposed Development since the 2014 Scoping process.

2.1.2 The Proposed Development is to construct a new nuclear power station comprising two reactors (identified as United Kingdom European Pressure Reactors™ in the Scoping Report) with a total expected generating capacity of approximately 3,240 MW. In addition to the new nuclear power station site, the Proposed Development includes both temporary and permanent off-site development associated with the construction and operation of the power station.

2.1.3 The 'main development site' is defined as the new nuclear power station and on-site associated facilities, which include a worker accommodation campus and caravan site, administration offices, waste recycling facilities, perimeter and internal roads, and utilities provision including a foul water pumping station. Connection to the National Grid via a new 400kV substation and overhead lines is also proposed as part of the main development site.

2.1.4 The 'off-site elements' of the Proposed Development are defined as associated development and are largely related to transport. The Scoping Report presents options for either a road-lead transport strategy or rail-led strategy for the construction of the Proposed Development. Plate 3.1 lists the options within each strategy. The off-site proposals for the road-led strategy include: a bypass from the A12 to the A1094 at Farnham 'A12 Two village bypass'; a new roundabout at Yoxford; a new Sizewell link road between the A12 and Therberton; a freight management facility; upgrades to the East Suffolk railway line and works to Sizewell Halt or a new rail siding for the construction period. The rail-led strategy includes a new 'Green rail route' and new rail infrastructure which also forms part of the road-led strategy. Local road improvements and junction works are also described in outline and are necessary for delivery of both strategies.

2.1.5 The main development site is located to the north of the existing Sizewell B power station on the Suffolk coast to the north-east of the town of Leiston. The off-site associated developments are proposed in locations on the surrounding road and rail network from the vicinity of Darsham to the north and Woodbridge to the south. Figure 3.1 of the Scoping Report illustrates the main development site and Figure 1.1 provides an overview of the entire Proposed Development, including the off-site associated developments.

2.1.6 The main development site currently comprises existing infrastructure associated with Sizewell A and B power stations, land in agricultural use, woodland, wetland, areas of lowland heath, waterbodies, and a section of vegetated dune coastal habitat. The 'temporary construction area' part of the main development site crosses the Sizewell Marshes Site of Special Scientific Interest (SSSI). The off-site associated development sites lie largely within agricultural land and areas of woodland and within close proximity of existing roads, rail infrastructure, public rights of way (PRoW) and existing properties and built areas. The existing features are shown to some extent on Figures 3.2 and Figures 3.5 to 3.35 of the Scoping Report.

2.2 The Planning Inspectorate's Comments

Description of the Proposed Development

2.2.1 Very little information is provided in the Scoping Report regarding the existing land use and the features in the surrounding area of the Proposed Development. In addition to detailed baseline information to be provided within aspect specific chapters of the ES, the Inspectorate would expect the ES to include a section that provides an overview of the context of the Proposed Development, including information on any relevant designations and sensitive receptors. The ES should identify land that could be directly or indirectly affected by the Proposed Development as well as any associated off-site mitigation proposals.

2.2.2 The anticipated areas in hectares and proposed dimensions (maximum and minimum heights, footprints etc) of structures are not provided in the Scoping Report project description. The project description in the ES must include sufficient detail to understand the parameters which form the basis of the assessment of environmental effects. This should include the proposed dimensions of buildings, structures and the land use requirements through all phases of the Proposed Development (demolition, construction, operation, and decommissioning). The proposed ground level above ordnance datum (AOD) should also be provided for all structures and areas of made-up ground.

2.2.3 Paragraph 3.2.3 of the Scoping Report refers to Figure 3.1 for the locations of the four components of the main development site. The text does not follow the numbering shown on Figure 3.1,, making it more difficult to correspond and confirm the respective location and extent of features depicted. The ES must clearly present this information.

2.2.4 Appendix 1A of the Scoping Report states that "studies confirming the stack height are expected to be completed in late 2014 to inform the radiological assessment". The Scoping Report makes no reference to stack height or

information regarding the results from the previous study. The ES should include results from relevant stack height studies and where relevant this information should influence assessments in other aspect chapters, such as landscape and visual impacts and the assessment of air quality impacts.

2.2.5 The permanent elements of the Proposed Development described in Paragraph 3.3.6 of the Scoping Report are not labelled on Figure 3.2. Paragraph 3.3.7 of the Scoping Report refers the reader to Figures 7.4 and 7.5 for details pertaining to the temporary elements of the Proposed Development. However, the Scoping Report does not include these figures. It is therefore, difficult to understand the construction layout and the operational layout. The ES should include the information necessary to clearly depict the proposed DCO boundary. If figures or plans are included for this purpose they should be clearly labelled to demonstrate the existing land use and the proposed construction and operational land use. Existing local features including those to be retained within the operational design and which are referred to in the assessment should also be shown clearly and labelled.

2.2.6 The Scoping Report is not clear or definitive regarding the permanent and temporary elements of the Proposed Development. For example, the accommodation campus for 2,400 construction workers is described in Paragraph 3.3.7 as being a temporary element and is shown on Figures 3.3 and 3.4 as a construction feature. However, Paragraph 3.3.2 'Changes to permanent elements since the 2014 EIA Scoping Report' also refers to the accommodation proposals which creates ambiguity regarding the longevity of these elements. The Combined Heat and Power (CHP) plant for the campus is described in Paragraph 3.3.3 of the Scoping Report as a new permanent element but is not specifically mentioned in Paragraph 3.3.6 along with the other permanent elements described, instead it is associated with the accommodation campus which is stated to be a temporary element of the Proposed Development. The ES must provide a detailed description of all the permanent and temporary works which form part of the Proposed Development applied for in the dDCO. The ES should describe the anticipated lifetime of any temporary elements (eg the entire construction period or a part thereof). The Scoping Report states in Paragraph 6.21.91 that temporary structures will be designed in such a way as to facilitate their deconstruction at the end of their lifetime. The features of their design should be described in the ES where relevant to the assessment of likely significant effects.

2.2.7 Plate 3.1 of the Scoping Report provides the only direct comparison of the off-site associated development proposed under the road-led and rail-led transport strategies but does not mention the temporary park and ride facilities described in Paragraph 3.4.1 and does not provide clear detail on the road and rail proposals, although these are described in subsequent paragraphs of the Scoping Report. The Scoping Report does not provide clear detail regarding the proposed approach to the delivery of the road or rail led transport strategy. The Inspectorate is unclear how and when the decision to pursue one or both strategies will be made. The Applicant should ensure that the approach to the implementation of the transport strategy is agreed early in the process as this will form the basis of the assessments in the ES. The ES should describe the proposed works and explain how they form part of the chosen strategy. If

decisions relating to this option are to be deferred or options are pursued (see comments under Alternatives and Flexibility, below) the ES should ensure that any flexibility of this sort is addressed and appropriately assessed.

2.2.8 The Inspectorate considers that where a DCO application includes works described as 'Associated Development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as Associated Development. This could be presented in a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.

2.2.9 For the purposes of this Scoping Opinion the Inspectorate has use the terms 'main development site' to refer to the elements described in Section 3.2 (a) of the Scoping Report which the Scoping Report describes includes primary and associated development; and 'off-site associated development' as described in Section 3.2 (b) of the Scoping Report.

2.2.10 Paragraph 3.5.2 states that the Two Village Bypass will form a new section of the A12 and remain as a legacy element of the proposals (this element is also described as forming part of both transport strategies). The ES should explain what will happen to the bypassed section of the existing A12 as a result of the proposals and assess any significant effects. Similarly, the fate of other sections of existing highway that would become disused due to the other proposed highways works should be described in the ES and any significant effects assessed.

2.2.11 A number of new structures including bridges, drainage infrastructure, lighting columns, and signage are proposed as part of the off-site associated development. The ES should ensure that these are adequately described and that relevant design parameters are appropriately secured in the dDCO. Further comments relating to the assessment impacts associated with these structures are provided in the aspect tables in Section 4 of this Opinion.

2.2.12 It is noted that the A140/B1078 off-site associated development is not illustrated on any plans provided with the Scoping Report, however plans are provided for the other off-site associated developments. The ES should be accompanied by a complete suite of plans which show the entire Proposed Development on which the assessment of significant effects has been based.

2.2.13 The Inspectorate notes the information in Paragraphs 3.2.6 to 3.2.8 of the Scoping Report regarding the parallel application for proposed relocation of Sizewell B facilities, made separately to the local planning authority, East Suffolk Council (ESC). The Scoping Report states that the proposed relocation of Sizewell B facilities will also be included within the Proposed Development DCO application so that the ES can consider these works. Limited information has been provided about the nature of the Sizewell B Facilities relocation works, and they have not been included in the description of the Proposed Development.

It has therefore not been possible to include specific comments regarding these activities in this Scoping Opinion. If these works are to be included within the dDCO, a full description and assessment of the likely significant effects made must be included in the ES. The Inspectorate notes from Network Rail's response in Appendix 2 that some works to existing rail infrastructure would be undertaken under separate consent. The ES should assess all likely significant effects associated with works necessary for the Proposed Development regardless of the consent route followed. The consenting route should be clearly stated in the ES so that the decision maker is able to discern the effects that are directly applicable to the DCO.

2.2.14 Phasing of the main development site is discussed in Paragraphs 3.3.9 to 3.3.15, and phasing of the off-site associated development is outlined in Paragraphs 3.4.11, 3.5.7, 3.6.4, 3.7.8, and 3.8.6. The ES should clearly set out the proposed phasing of works and include details such as, the anticipated timescales associated. Such detail will be relevant to assessments in the ES. This should include information on how the timescales of the relocation of the Sizewell B facilities and of the off-site associated development are related to the phasing of the main development site.

2.2.15 The project description in the Scoping Report occasionally introduces previously unmentioned terminology (eg Fish Recovery and Return system, the abbreviation ISFS (Interim Spent Fuel Store)) either with no further explanation or explanation only in later paragraphs. The Applicant should ensure that technical terms and associated acronyms introduced in the ES are described at first mention. The Inspectorate encourages the inclusion of a glossary or other reference material in the ES for this purpose.

2.2.16 The Scoping Report describes various phases of earthworks including those required to establish the 'main development site platform' at 7.3m AOD, the flood defences, a beach landing facility, and excavations including borrow pits. Reference is made to sourcing material from within the 'temporary construction site' or from off-site areas. The ES should explain the anticipated quantity and likely source of material required to deliver the Proposed Development. The ES should also describe the anticipated phasing of earthworks and restoration works if applicable. The location and extent of borrow pits, the northern mound, stockpiles and other earthworks should be described in the ES with reference to the works to be secured in the dDCO.

2.2.17 The Inspectorate considers that where relevant to the assessments, the ES should provide information on the construction methods and activities associated with each phase; siting and size of construction compounds (including on and offsite); lighting equipment/requirements; and number, movements and parking of construction vehicles (both heavy goods vehicles (HGVs) and staff). Information should also be provided within the ES on whether any construction activities are restricted to a particular time of year.

2.2.18 The descriptions of the cooling systems (including seawater intake and outflow), anticipated liquid discharges, spent fuel, and gaseous emissions in Chapter 3 of the Scoping Report are at a high level. The project description in the ES should provide a full description of these processes, with further detail in the technical

assessments where relevant, of the anticipated nature and quantity of materials or substances used and produced in the construction, operation and decommissioning of the Proposed Development.

2.2.19 The information in Section 3.12 of the Scoping Report regarding waste management, including the management of spent fuel, sits within a summary section, however, there is no mention of these matters within the description of the development. Paragraph 3.3.6 mentions 'waste facilities' as part of the permanent works but there is little detail about the ISFS overall. The description of the Proposed Development in the ES should include sufficient explanation of the proposed facilities and processes for the management of spent fuel, in order to allow the decision-maker to have confidence that safe, secure and environmentally acceptable interim storage arrangements will be available. The ES should assess the significant environmental effects of spent fuel management, including the treatment and transport of Low Level Waste (LLW) mentioned in Paragraph 3.12.11 of the Scoping Report. Further comment is provided in Section 4 of this Opinion.

2.2.20 The Scoping Report identifies the anticipated electricity generation of the power station itself but does not provide information on the energy demand and energy used by other elements of the Proposed Development, for example details of the CHP plant associated with the proposed accommodation campus. This information should be provided in the ES, where relevant to the assessments of significant effects.

2.2.21 Information on the operation and maintenance of the Proposed Development should be included in the ES where relevant to the assessments, regarding the number of full/part-time jobs; the operational hours and if appropriate, shift patterns; and the number and types of vehicle movements generated during the operational stage. A distinction may need to be made between normal operation and specific operations, for example outage periods, to demonstrate the basis for the assessment of significant environmental effects.

2.2.22 The Inspectorate acknowledges that decommissioning will be subject to a separate consent(s) from the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. The Inspectorate welcomes the inclusion of a high-level environmental assessment of the decommissioning of the Proposed Development within the ES and considers that the process and methods of decommissioning should be explained and options presented in the ES, where possible. The assessment should provide information about the predicted future baseline which has been applied to the assessment of decommissioning effects. The estimated timescales for the life span of the Proposed Development should also be set out, along with an indication of the certainty in this regard. The sensitivity of the findings in the assessment to any departure or deviation from the estimated timescales should be explained.

2.2.23 The Inspectorate notes that the operational life of the Sizewell C power station is anticipated to be 60 years, while the life of the spent fuel storage element of the development would be at least 100 years, and is anticipated to capable of operating independently beyond the life of the operational power station. The

ES should describe how the facilities associated with the management of spent fuel storage are likely to be maintained and assess any significant effects associated with these activities.

2.2.24 The Scoping Report describes works to remove the temporary elements of the Proposed Development but provides limited detail. The ES should provide full details of the nature of these works including the anticipated phasing and reinstatement proposals, including how they are to be secured in the dDCO. The ES should assess the likely significant effects which could arise from the removal of the temporary elements of the Proposed Development.

Alternatives

2.2.25 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

2.2.26 The Inspectorate notes that no alternatives will be considered for the location of the Sizewell C site and the design of the reactors, as these have been determined through a site selection assessment and the UK Generic Design Assessment (GDA) process. The Inspectorate acknowledges the Applicant's intention to consider alternatives in respect of the design and layout of remaining aspects of the Proposed Development within the ES and notes the information in Chapter 4 of the Scoping Report. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

2.2.27 Paragraph 4.3. of the Scoping Report addresses the selection process of the transport strategy which will form the final design. The Scoping Report states that the ES will include a justification for the strategy selected for the final design including the consideration of environmental effects. The Inspectorate is unclear whether the decision to pursue one or both strategies will be made prior to completion of the ES. If a decision will not have been made and both strategies are to be assessed in the ES, the ES should clearly set out the anticipated environmental effects associated with both alternative transport strategies or identify a worst case using appropriate parameters and assumptions.

2.2.28 The Scoping Report does not provide clear detail regarding the proposed approach to delivery of the road or rail led transport strategy. The Applicant should ensure that the approach to the implementation of the transport strategy is agreed early in the process as this will form the basis of the assessments in the ES. The ES should clearly set out the proposed works that form the chosen strategy.

Flexibility

2.2.29 The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a Rochdale Envelope approach for this purpose. Where the details of the Proposed Development cannot be defined precisely, the Applicant will apply a worst case scenario. The Inspectorate welcomes the reference to Planning Inspectorate Advice Note nine 'Using the 'Rochdale Envelope' in this regard.

2.2.30 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

2.2.31 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

2.2.32 The Scoping Report makes particular note of the uncertainty regarding the chosen transport strategy for the Proposed Development, as the Scoping Report does not explicitly state that either the road-led or rail-led (not both) will be taken into the assessment in the ES, although it is understood from the Scoping Report that only one will be implemented. With regard to the comments above regarding Regulation 14 of the EIA Regulations the Inspectorate strongly advises that a strategy is decided upon prior to making an application for development consent.

3. ES APPROACH

3.1 Introduction

3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'[1] and associated appendices.

3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.

3.2.2 The designated NPS(s) relevant to the Proposed Development are the:

- Overarching NPS For Energy (NPS EN-1);
- NPS for Nuclear Power Generation (NPS EN-6);

[1] Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- to describe any remedial measures that are identified as being necessary following monitoring; and

3.3.2 It is noted from Natural England's response in Appendix 2 that the Proposed Development lies within the Outer Thames Estuary Special Protection Area (SPA) and the Southern North Sea Special Area of Conservation (SAC) and lies adjacent to other internationally designated sites. The ES should be co-ordinated with the information submitted to inform an assessment under the Habitats Regulations (Habitat Regulation Assessment (HRA) report).

3.3.3 Chapter 7 of the Scoping Report sets out the proposed outline structure of the ES, and Table 7.1 provides more detail on where the information required in Schedule 4 of the EIA Regulations is proposed to be reported in the ES. The proposed structure is:

- Volume 1: Introduction
- Volume 2: Sizewell C main development site
- Volume 3: Northern park and ride at Darsham
- Volume 4: Southern park and ride at Wickham Market
- Volume 5: Two village bypass
- Volume 6: Yoxford roundabout and other highways improvements
- Volume 7: Sizewell link road or Theberton bypass
- Volume 8: Freight management facility
- Volume 9: Rail improvements
- Volume 10: Cumulative and transboundary assessment

3.3.4 The Scoping Report states that Volume 2 will also include 'project-wide' assessments but does not detail the assessments this refers to. The Inspectorate advises that the ES should clearly set out this information. The Inspectorate appreciates the scale of the Proposed Development and why it may be advantageous to structure the ES in the way proposed. However, the Inspectorate is concerned that the above approach will make it difficult to

understand the significant environmental effects of the Proposed Development in the entirety, and risks assessing each individual element in isolation. The assessments in the ES must explain the overall effects of the Proposed Development and the Inspectorate advises that the 'project-wide' assessments are given careful consideration to ensure a robust approach is applied.

3.3.5 It remains unclear from the outline structure set out above whether the ES will assess one or both of the road-led or the rail-led transport strategies. The Inspectorate reiterates the comments above in Section 2 of this Opinion regarding refinement of the design options. Should both options form part of the application, the ES must fully assess these options using appropriate assessment techniques.

3.3.6 The Scoping Report states that the relocation of the Sizewell B facilities will form part of the dDCO, while these works are not described in detail in the Scoping Report they are listed along with the permanent works identified in Paragraph 3.3.6. It has therefore been assumed that they are intended for inclusion in the request for a Scoping Opinion for the Proposed Development. The limited description hampers the ability to provide specific comments regarding these works and so the Scoping Opinion does not extend to address these elements of the Proposed Development.

3.3.7 The Inspectorate notes the proposed approach to append and cross-refer to the ES which accompanied the application to ESC for the relocation of the Sizewell B facilities. Comments are provided elsewhere in this Opinion regarding consideration of changes to the works or to the receiving baseline environment, and the Inspectorate considers that the proposed approach is likely to make interpretation of the ES more difficult. The Inspectorate advises that the ES for the Proposed Development must assess the proposals to be included in the DCO in their entirety and include a complete assessment of the likely significant effects of the Proposed Development including any works subject to parallel consenting or permitting regimes.

3.3.8 Table 7.1 of the Scoping Report states that waste management and emissions to soils and agricultural land, major accidents and disasters, and climate change effects will be addressed in Volume 2 of the ES (although elsewhere in the Table it states that a chapter on climate change is proposed in each volume of the ES). This would imply that these matters are not to be considered as 'project-wide' but for the main development site only. The Inspectorate considers that these matters must be assessed where significant effects could occur for the Proposed Development in its entirety, including during the construction, operation, and reinstatement phases. The assessment should be carried out relevant to all elements of the Proposed Development including those that form the content of Volumes 3-9 of the ES. In this regard the Applicant is referred to comments in Paragraph 3.3.4 of this Opinion.

3.3.9 The Inspectorate recommends that the ES assess the significant environmental effects associated with the Proposed Development and its interaction with utility receptors/ infrastructure assets, such as (but not limited to) existing gas and water pipelines, overhead/underground electrical cables, sewer network, and potable water supply. This should include consideration of both onshore and

offshore receptors and assess impacts during construction, reinstatement, and operation of the proposed development.

Baseline Scenario

3.3.10 The ES should include a description of the baseline scenario with and without implementation of the Proposed Development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

3.3.11 In light of the number of ongoing developments within the vicinity of the Proposed Development application site, the Applicant should clearly state which developments will be assumed to be under construction or operational as part of the future baseline. As part of this, the relationship with the proposed relocation of the Sizewell B facilities must be fully explained. The ES for the Proposed Development must address where the assessments associated with the Sizewell B may be out of date (in light of changes to the works or evolving baseline conditions) and the implications for the assessments for the Proposed Development.

3.3.12 The Scoping Report does not explain what, if any, overlap is anticipated between the Proposed Development and the continued operation of Sizewell B and the decommissioning of Sizewell A. This information is relevant to the assessment of cumulative effects (see Table 4.22 in Section 4 of this Opinion) and should be addressed in the ES.

3.3.13 The Scoping Report outlines the assessment scenarios that will be considered but does not stipulate any timescales or phasing for the scenarios described. The ES should explain the timescales of the assessment scenarios including how the information on the phasing of the construction works has been incorporated.

Forecasting Methods or Evidence

3.3.14 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.

3.3.15 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes between 'significant' and 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. The Inspectorate notes the information in Chapter 5 of the Scoping Report, Section 5.3, and is satisfied with this approach.

3.3.16 Given the scale of the Proposed Development and the anticipated duration of the construction phase and indicative lifespan of the operational phase, the temporal scale of identified impacts should be estimated and set out in the ES. Should terms such as 'short-term' or 'long-term' be used these should be defined in the ES.

3.3.17 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

3.3.18 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation

3.3.19 The Inspectorate notes the proposed approach described in Section 5.4 of the Scoping Report to the description of mitigation and residual effects in the ES. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects.

3.3.20 The Scoping Report states in Paragraph 5.4.5 that secondary mitigation (measures implemented to reduce or avoid significant effects but not embedded in the design of the Proposed Development) will not feature on any application plans. The Inspectorate advises that any secondary mitigation relied upon for the purposes of the assessment of likely significant effects should be described in the ES (and wider application where appropriate). The description should include adequate detail to allow it to be examined and understood, and for the outcomes of the ES which rely on it to be examined and understood. The Inspectorate advises that the ES must address the timing of implementation of any mitigation measures within the wider proposals, and details of how any mitigation proposed is to be secured, with reference to specific DCO requirements or other legally binding agreements.

Risks of Major Accidents and/or Disasters

3.3.21 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.

3.3.22 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European

Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

Climate and Climate Change

3.3.23 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

3.3.24 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Scoping Report has not indicated whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.

3.3.25 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.

3.3.26 Section 5.6 of the Scoping Report acknowledges the requirements of the EIA Regulations and states that the EIA will consider transboundary effects and that the ES will report the assessment in a standalone chapter. The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected. The Inspectorate refers the Applicant to Advice Note 12, which sets out the Transboundary special arrangements the Inspectorate will follow in relation to nuclear NSIPs.

A Reference List

3.3.27 A reference list detailing the sources used for the descriptions and assessments must be included in the ES. The Applicant should make effort to ensure that referencing in the ES to other material and to other parts of the ES is accurate.

Expertise Statement

3.3.28 In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

3.4 Confidential Information

3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.

4. ASPECT BASED SCOPING TABLES

4.1 Socio-Economics

(Scoping Report section 6.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.1.2	Table 6.1	Baseline – construction workforce	The Scoping Report explains the Applicant's intent to establish the construction workforce indicative skills profile and the split between non-home based and home-based workers. Any research conducted by the Applicant to inform the profile should be explained in the ES and described having regard to the existing Labour Market offer.
4.1.3	Table 6.1	Methodology – Gravity model	The Scoping Report states that the Gravity Model will be developed in consultation with the relevant stakeholders. Assumptions made in the construction of the model should be clearly explained in the ES along with any limitations and uncertainty identified.
4.1.4	Table 6.1	Baseline – potential effects on tourism	The Scoping Report states that the Applicant has engaged local focus groups to identify potential sensitive receptors which could be affected by the proposal. The terms of the engagement, scope and methodology of the study conducted should be explained clearly along with the criteria used to identify the receptors.
4.1.5	Paragraph 6.2.7	Study area	Paragraph 6.2.7 of the Scoping Report states that the spatial extent of the study area remains as per paragraphs 6.2.5 to 6.2.7 of Appendix 1A. Paragraph 6.2.5 of Appendix 1A states that the spatial scope of the socio-economic baseline studies varies by impact

ID	Ref	Other points	Inspectorate's comments
			category. The Inspectorate recommends that the spatial scope applied to establish the study area is defined and clearly presented in the ES. The study area must be sufficient to address all likely significant effects including cumulative effects with other developments. Where necessary, the study area should be depicted on figures/plans in the ES.
4.1.6	Paragraph 6.2.7	Study area	The Scoping Report states at paragraph 6.2.7 that the study area remains as set out at paragraphs 6.2.5 to 6.2.7 of Appendix 1A. These paragraphs show two construction workforce spatial distribution areas: a 60-minute travel time representing the estimated extent of daily travel to construction site by non-home based workers and a Construction Daily Commuting Zone (CDCZ) used for the home-based labour market (up to 90-minute travel time). The ES should explain and justify the reasons supporting the selection of the distribution study areas. Information used to support the approach should be presented in the ES or in an accompanying appendix.
4.1.7	Paragraph 6.2.7	Study area	Paragraph 6.2.7 of the Scoping Report states that effects on visitors to the Suffolk Coast will also be considered. The ES should define the spatial extent of the touristic area potentially affected and demonstrate the level of agreement reached with relevant consultation bodies.
4.1.8	Paragraph 6.2.15	Assessment methodology and Tourism Survey	Paragraph 6.2.15 of the Scoping Report states that a quantitative Tourism Survey was conducted to help identify the sensitivities of returning and new visitors to the Suffolk Coast. The ES should explain the methodology and the criteria used particularly that which is used to identify the sensitivity of receptors, the magnitude of the of the potential impacts and the significance. Where professional judgment is employed, the ES should explain the reasoning and limitations.

ID	Ref	Other points	Inspectorate's comments
4.1.9	Paragraph 6.2.19	Assessment methodology	The ES should explain what are the worst case scenarios (both during construction and operations) considered in the assessment. Paragraph 6.2.17 of Appendix 1A states that the assessment will be focused primarily on the peak construction period. Any assumption made in terms of timescale, peak workforce, skills requirements should be explained in the ES.
4.1.10	n/a	Assessment methodology	The ES should demonstrate how the spatial distribution of the predicted impacts (both adverse and beneficial) have been factored into the assessment of significant effects.
4.1.11	Paragraph 6.2.22	Potential impacts – construction	Paragraph 6.2.22 of the Scoping Report states that potential impacts during construction are consistent with those set at Table 6.2.4 of Appendix 1A which does not distinguish between adverse and beneficial effects The ES should clearly show this distinction.
4.1.12	Paragraph 6.2.22	Potential impacts – construction	The ES should assess impacts associated with business displacement, as the Proposed Development will compete for the same local workforce and skills alongside other sectors. Potential effects on local business in terms of recruitment/retaining workforce should be assessed where significant effects are likely.
4.1.13	Paragraph 6.2.22	Potential impacts – construction	The ES should include assess impacts from the Proposed Development on social cohesion where significant effects are likely to occur.
4.1.14	Paragraph 6.2.23	Potential impacts - operation	Paragraph 6.2.23 of the Scoping Report states that the potential impacts of the Proposed Development during operation remain as set out at paragraphs 6.2.36 and 6.2.38 of Appendix 1A. The ES should assess temporary and permanent impacts associated with staff influx to the local area during construction and the operation phase of the Proposed Development, i.e. during maintenance and outage work when temporary additional staff is required.

ID	Ref	Other points	Inspectorate's comments
4.1.15	Paragraph 6.2.26	Mitigation	The Inspectorate recommends that the ES should include sufficient detail in relation to the employment and training strategies with a clear set of criteria and objectives and any commitment to monitor the results.
4.1.16	Paragraph 6.2.26	Mitigation	Paragraph 6.2.26 of the Scoping Report states that the principles for mitigation of potential adverse impacts remain as set out at paragraphs 6.2.39 to 6.2.44 of Appendix 1A. These do not include mitigation of any adverse effect on agricultural businesses. Any measures to mitigate effects to agricultural businesses should be described in the ES.

4.2 Transport

(Scoping Report section 6.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.2.2	Paragraph 3.2.14 and Sections 3.4 - 3.10	Rail-led/ road-lead strategy	Noting the information in Sections 3.4 to 3.10 of the Scoping Report, the ES must set out the predicted road and rail movements (by type, including numbers in and numbers out) for the chosen transport strategy for all phases of the Proposed Development, in particular the construction phase.
4.2.3	Table 3.1	Extended operational hours	The Inspectorate notes from Table 3.1 the *"potential for extended hours (i.e. beyond 07:00-23:00)".* The ES should explain the anticipated frequency that extended operational hours would be required for HGVs (and trains, if relevant) and incorporate this into the assessment of likely significant effects. Any interactions with other ES aspects, for example impacts on noise sensitive receptors, should be explained and assessed where significant effects are likely.
4.2.4	Paragraph 3.3.26	Potential impacts	The ES should explain the potential transport impacts associated with decommissioning of temporary infrastructure (rail, accommodation, contractor's area etc), including whether there is any potential for interaction with transport impacts resulting from operation of the proposed Sizewell C. Any likely significant effects should be assessed.
4.2.5	Paragraphs 3.7.3 and	Potential impacts	A new road bridge over the East Suffolk railway line is proposed (as part of the road-led strategy only), along with various upgrades and level crossing works to the East Suffolk railway line and the branch

ID	Ref	Other points	Inspectorate's comments
	3.10.5-3.10.7		line. The ES should describe any interactions between existing rail infrastructure and the Proposed Development. Any likely significant effects on sensitive receptors including rail travellers should be assessed in the ES.
4.2.6	Paragraph 3.7.8	Construction programme	The Scoping Report refers to proposed transport infrastructure (for example, the Sizewell Link Road) as being *"…built during the early years of construction".* The ES should set out the anticipated timing and duration of construction of each proposed transport element (including upgrades/ changes to existing infrastructure) and confirm how these fit into the phased construction programme.
4.2.7	Paragraph 6.3.5	Potential impacts	The Scoping Report refers to an assessment of traffic-related noise and air quality impacts. However, it is unclear if this would include impacts from trains using the proposed green rail route (under the rail-led strategy). The ES should describe the potential impacts from construction and operation of the proposed rail infrastructure (including noise, air quality and any other relevant aspects) and assess any likely significant effects. It should be clear how the assessment relates to the maximum number of train movements along the green route (described in the Scoping Report as being up to five deliveries, ten movements per day).
4.2.8	Paragraphs 6.3.11 and 6.3.17	Study area and VISUM traffic model	The ES should clearly define the study area used for the assessment and explain the approach taken to do so, which should be influenced by the extent of likely impacts. The study area and modelled network for the VISUM model should be illustrated on a plan in the ES. The Applicant should make effort to agree with relevant consultation bodies the study area/s, baseline data, assessment methodologies (including use and development of the VISUM model and the number and location of junctions that require localised modelling) and mitigation measures.

ID	Ref	Other points	Inspectorate's comments
4.2.9	Paragraphs 6.3.18 – 6.3.23	Baseline data	The ES should identify and justify the locations for the traffic count surveys. The locations should be depicted on a supporting plan included within the ES or supporting appendices. The approach to undertaking baseline counts for non-motorised users (including cyclists, pedestrians and equestrians) should be detailed in the ES and effort made to agree the approach with relevant consultation bodies.
4.2.10	Paragraph 6.3.22 and 6.3.48-6.3.49	Potential impacts	Noting that traffic generated by periodic outage at Sizewell B will be included in all future year traffic modelling scenarios for robustness, the Scoping Report states that *"This will remove the need to assess the impacts of seasonality using the VISUM model since the impacts of Sizewell B outage are greater than those of seasonality".* The ES should provide a thorough justification to support this approach, including why traffic generated by a periodic outage at Sizewell B is considered to be the worst case scenario. It is unclear if an assessment of traffic impacts during temporary outage periods at the proposed Sizewell C is proposed. The Inspectorate advises that this matter is taken into account in the traffic modelling and assessed in the ES where significant effects are likely to occur. The ES should also explain whether there is any potential for periodic outages at Sizewell B and C with seasonal changes, and if so, how the likely traffic impacts have been considered in the ES assessment. Effort should be made to agree the approach with relevant consultation bodies.
4.2.11	Paragraph 6.3.30	Sensitive receptors	Whilst Appendix 1A identifies types of receptors which are sensitive to changes in traffic flows (e.g. schools), details of specific receptor locations for the purposes of the assessment are not provided. The Applicant should justify the choice of sensitive receptors with

ID	Ref	Other points	Inspectorate's comments
			reference to the extent of the likely impacts and seek to agree these with the relevant consultation bodies. The Inspectorate advises that the sensitive receptors should include rail travellers (as noted above), heritage assets and nature conservation sites where significant effects are likely to occur.
4.2.12	Paragraph 6.3.33 and Table 6.3; paragraphs 6.8.27 – 6.8.30	Potential impacts	In addition to pedestrians, impacts to other types of non-motorised users such as equestrians and cyclists should be assessed where significant effects are likely. The assessment should be supported by baseline counts as noted above. If any temporary or permanent diversions of PRoW are required, the affected section of the route and the proposed diversion should be described in the ES. It should be clear in the ES how long any temporary diversions are likely to be in place and how provision of the diversions would be secured through the DCO or other suitable mechanisms. Any likely significant effects to users of PRoW (including pedestrians, cyclists and equestrians) should be assessed.
4.2.13	Paragraph 6.3.37	Traffic modelling	The Scoping Report explains that the construction traffic modelling will take account of *"…any mitigation measures that are anticipated to be in place by this time".* The ES must clearly identify the relevant measures and explain the extent to which the findings of the traffic modelling (and conclusions of significance of effect) are reliant on their delivery. If the delivery of mitigation measures before construction cannot be guaranteed, the ES should present the significance of effect both with and without delivery of these measures.
4.2.14	Paragraph 6.3.40	Traffic modelling	The Scoping Report explains that major known developments with planning permission (in addition to the Scottish Power Renewables developments) will be included in the reference case for the traffic modelling. Whilst a list of such developments is not provided in the Scoping Report, the Applicant is advised to keep this under review

ID	Ref	Other points	Inspectorate's comments
			should any other development come forward which may trigger the need to update the traffic modelling work. The relationship between the developments included in the reference case for the traffic modelling and the 'other developments' considered in the cumulative assessment should be clearly explained in the ES and effort made to agree the approach with relevant consultation bodies.
4.2.15	Paragraph 6.3.52	Abnormal loads	The ES should confirm the anticipated number of abnormal loads (including any to be delivered via the beach landing facility) and the types of vehicles/ vessels required. Any mitigation measures required to facilitate the delivery of abnormal loads should be detailed in the ES and any resultant likely significant effects should be assessed.
4.2.16	Paragraph 6.3.52	Access routes	The Scoping Report explains that HGV movements to the construction site would be limited to *"approved routes"*. The ES should clearly describe all routes to be used for vehicular, pedestrian and cyclist access during construction and operation of the Proposed Development and this information should be clearly presented on supporting plans contained within the ES. The ES should explain how adherence with the approved routes for HGVs would be ensured and how the proposed access route(s) relate to the selected sensitive receptors (see above). Diversion routes and other contingency measures for HGV traffic, for example in the event of a temporary closure of the Orwell Bridge, should be described and any likely significant effects assessed.
4.2.17	Paragraph 6.3.56	Mitigation	Paragraph 6.3.56 explains that a number of transport management plans would be prepared, *"…aimed at managing and mitigating the significant traffic effects…".* Draft/ outline versions of these documents should be appended to the ES. The ES should

ID	Ref	Other points	Inspectorate's comments
			demonstrate how adherence with the measures in these documents will be secured.
4.2.18	n/a	Impacts	The ES should assess any likely significant effects which could occur as a result of the transport of waste. The ES should clearly explain any assumptions in this regard (for example, the number of vehicles required to transport waste materials, quantities of spent fuel and quantities of contaminated land).
4.2.19	n/a	Impacts	The ES should identify the potential impacts to the condition of existing road and rail infrastructure resulting from HGV construction traffic. Any likely significant environmental effects should be assessed including the environmental effects of any proposals for post-construction restoration works. Any such works should be clearly described in the ES and it should be clear how they would be delivered and secured.

4.3 Noise and Vibration

(Scoping Report section 6.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	Paragraph 6.4.4 and Appendix A1	Assessment of impacts to ecological receptors (from the Noise and Vibration aspect chapter)	Paragraph 6.4.4 of the Scoping Report proposes that an assessment of impacts to fish and other marine species is scoped out of the Noise and Vibration ES aspect chapter and instead, is presented in the Marine Ecology ES aspect chapter. Scoping Report Appendix 1A (page 36) also intends to assess noise and vibration impacts to terrestrial ecology species in the Terrestrial Ecology and Ornithology ES aspect chapter. The Inspectorate is content that these matters can be assessed in the Marine Ecology and Terrestrial Ecology and Ornithology ES chapters of the ES. In this regard the Applicant's attention is drawn to the Inspectorate's comments in Tables 4.6 and 4.15 of this Scoping Opinion.
4.3.2	Table 6.5	Assessment of impacts from freight management facility Option 1 (A12/ A14 Seven Hills site)	Table 6.5 of the Scoping Report proposes an assessment of noise and vibration impacts from freight management facility Option 2 only (the Innocence Farm site). The Scoping Report includes no justification in support of this approach. For the avoidance of doubt the Inspectorate does not agree to scope this matter out of the ES. The ES should describe the potential noise and vibration impacts arising from the use of freight management facility Options 1 and 2 and assess any likely significant effects.

ID	Ref	Other points	Inspectorate's comments
4.3.3	Paragraph 2.2.9	Impacts	Noise impacts associated with the use of the emergency diesel generators should be assessed in the ES where significant effects are likely.
4.3.4	Paragraphs 6.4.10 and 6.4.11	Baseline	It is noted that some additional survey work will be carried out at *"key locations"* to update the baseline as reported in paragraph 7.7.6 of Appendix 1A, including *"in the areas around the proposed new road schemes".* However, specific locations (further to those identified in Appendix 1A) have not been identified. The Applicant should ensure that the information used to inform the assessment is robust and includes a relevant baseline of noise and vibration for the entirety of the Proposed Development. The Applicant should make effort to agree the survey locations with relevant consultation bodies and the ES should fully justify the approach taken. The ES should contain details of the survey/ monitoring locations (with reference to supporting plans), sampling period and equipment used. In addressing these points, the Applicant should take account of the Inspectorate's comments above regarding freight management facility Option 1.
4.3.5	Paragraph 6.4.9	Study area and sensitive receptors	The Scoping Report explains that the study area for the purposes of the noise and vibration assessment remains consistent with that described in Appendix 1A (paragraphs 7.7.3 – 7.7.5), although this has been extended in some instances to account for the proposed new road schemes/ improvements, rail crossings/ upgrades/ improvements and freight management facility Option 2. The ES should contain a robust justification in support of the chosen study area and receptors. The receptors should reflect the extent of the likely impacts from the entirety of the Proposed Development (including all new elements). The ES should explain how other

ID	Ref	Other points	Inspectorate's comments
			relevant aspects (for example, construction traffic routes to the different parts of the application site) relate to the study area and sensitive receptors. The Applicant should make effort to agree the study area and sensitive receptor locations with relevant consultation bodies and these should be illustrated on figures in the ES. In addressing these points, the Applicant should take account of the Inspectorate's comments above regarding freight management facility Option 1.
4.3.6	Paragraph 6.4.12	Criteria for assessment of vibration impacts	The Inspectorate notes the intention to set out proposed criteria for the assessment of impacts from vibration. In the ES, the selected criteria should be supported by reference to recognised guidance and any agreement reached with relevant consultation bodies. Where relevant, it should be clear how the criteria are specific to different sources of vibration.
4.3.7	Table 6.5	Impacts from traffic noise	The Inspectorate notes from Table 6.5 the intention to assess the potential noise impacts associated with construction and operational traffic at the main development site. It is unclear whether a similar assessment is proposed in relation to the other elements of the Proposed Development. For the avoidance of doubt, the ES should assess noise impacts associated with traffic generated across the entirety of the Proposed Development, where significant effects are likely.
4.3.8	Paragraph 6.4.15	Construction impacts	In addition to the construction impacts referenced in paragraph 6.4.15 of the Scoping Report, the Inspectorate considers there is potential for noise and vibration impacts to sensitive receptors resulting from the use of borrow pits. The ES should describe the potential noise and vibration impacts associated with the use of borrow pits and assess any likely significant effects.

ID	Ref	Other points	Inspectorate's comments
4.3.9	Paragraph 6.4.15	Construction impacts	Noise impacts from ships/ barges associated with the beach landing facility (including loading and unloading) should be assessed where significant effects are likely.
4.3.10	Paragraph 6.4.22	Cumulative effects	The Inspectorate is aware of other developments in proximity to the Proposed Development which have potential to be constructed over a similar timescale, including the Scottish Power Renewables developments. There is potential for significant cumulative noise and vibration effects from multiple large-scale construction activities taking place within a relatively confined geographic area. Detailed consideration of cumulative noise and vibration effects is required in the ES; this should be appropriately focussed towards the construction phases of the Proposed Development and other relevant developments. See further comments in Table 4.22 of this Opinion.
4.3.11	n/a	Monitoring	The ES should describe any proposals for monitoring of noise and vibration levels during construction (including any complaints procedures) and explain how such measures would be secured.

4.4 Air Quality

(Scoping Report section 6.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	Paragraph 6.5.19	Potential impacts – Construction	The Inspectorate noted that the proposed CHP plant intended to support the accommodation campus is not considered as a point source emission in the Air Quality aspect. Therefore, the Inspectorate is considering that this matter has been scoped out by the Applicant. The ES should assess significant effects associated with all sources of emissions to air during construction, including from point source emitters (i.e. the proposed CHP). The ES should also describe the methodology applied and the approach adopted to defining the study area.
4.4.2	Paragraph 6.5.20	Potential impacts - Operation	The Scoping Report states that the operation impacts to be considered are detailed at paragraphs 7.8.53 and 7.8.54 of the Appendix 1A and remain unchanged. Appendix 1A does not detail sources of emissions and pollutants. The ES should assess significant effects associated with all sources of emissions to air during operations, including from point source emitters and traffic (eg PM10, NO_2 NO_x and $PM_{2.5}$). The ES should also describe the methodology applied and the approach adopted to defining the study area.

ID	Ref	Other points	Inspectorate's comments
4.4.3	Paragraph 3.2.10 and 3.3.3	CHP plant and other point source emissions – Proposed Development phase	The anticipated lifespan of the CHP is inconsistently described within the Scoping Report. It is also unclear whether other point source emitters (eg combustion plant) will be required for the Proposed Development. The ES should clearly describe the anticipated lifespan

ID	Ref	Other points	Inspectorate's comments
			of the CHP and assess the impacts associated with it and other point source emitters during the construction and operation stages. The Applicant's attention is also directed to the comments of the Environment Agency (EA) at Appendix 2 of this Opinion with regards to the change in the EA's Regulatory Guidance Note 2 and the potential requirement for a permit under the Environmental Permitting Regulations 2018 for all combustion plant (including temporary construction plant) associated for the Proposed Development. The ES should include an assessment of construction impacts arising from combustion plant, together with mitigation as appropriate, where likely significant effects could occur.
4.4.4	Paragraph 6.5.9	Study area – road traffic	The Scoping Report states that the study area for the air quality assessment remains as defined in paragraphs 7.8.15 to 7.8.20 of Appendix 1A. It is noted that the study area will include the A12 between Ipswich to the south and Lowestoft to the north and the B1122 and other roads that area likely to experience some increase in traffic as a result of Sizewell C. The ES should clearly define and explain the chosen study area for the assessment of air quality effects associated with road traffic. The ES should explain the criteria used in considering construction and operation traffic, with cross reference to the transport assessment. The worst case scenario used in the assessment should be clearly identified. The Applicant should also make effort to agree the study area, baseline data, assessment methodology and mitigation measures with relevant consultation bodies.
4.4.5	Paragraph 6.5.9	Study area – point source emissions	Paragraph 6.5.9 of the Scoping Report states that the assessment of effects from point source emitters are considered up to 10km from the main development site. Some emitters (temporary or permanent) are located away from the main development site. Therefore, the

ID	Ref	Other points	Inspectorate's comments
			Inspectorate is concerned that this could result in some receptors being missed. The Applicant should ensure that the study area applied in the assessment is sufficient to address the extent of the likely significant effects and takes into consideration the receptors likely to be affected. The Applicant should make effort to agree the study area with the relevant consultation bodies.
4.4.6	Paragraph 6.5.9	Ecological receptors	The Inspectorate considers that the site lies within a sensitive area for changes in air quality, which includes Sizewell Marshes SSSI. The impacts on Sizewell Marshes SSSI, other designated sites and sensitive ecological receptors within the zone of influence should be carefully assessed. There is a need to consider potential related effects due to an increase in airborne pollution including fugitive dust especially during site preparation and construction but also operation, and any increase in traffic-related emissions during construction and operation. The assessment of air quality in the ES should cross-refer to the terrestrial ecology and marine ecology chapters of the ES and any report made with respect to the Habitats Regulations. The Inspectorate notes that the Institute of Air Quality Management (IAQM) has published new guidance titled "a guide to the assessment of air quality impacts on designated nature conservation sites" in June 2019 which replaces the IAQM Position Statement on 'Use of a Criterion for the Determination of an Insignificant Effect of Air Quality Impacts on Sensitive Habitats' issued in January 2016.
4.4.7	Paragraphs 6.5.11 and 6.5.12	Air Quality Management Areas (AQMA)	The ES should identify how the Proposed Development may affect Air Quality Management Area(s) (AQMA) and/or prevent/assist the relevant Local Planning Authorities to achieve air quality objectives.
4.4.8	Paragraphs 3.3.41 and 6.5.15	Methodology - Gaseous Emissions	Paragraph 6.5.15 of the Scoping Report states that the proposed methodology for air quality is detailed at Paragraphs 7.8.10 to 7.8.14 of Appendix 1A. The Inspectorate notes that the pollutants considered at paragraph 7.8.12 of Appendix 1A does not include all of those

ID	Ref	Other points	Inspectorate's comments
			gaseous emissions listed in the Scoping Report. The ES should include emissions from all potentially relevant sources in the assessment. The ES should detail the methodology used in the assessment and any mitigation measures deemed necessary.
4.4.9	Paragraph 6.5.23	Mitigation	The Scoping Report acknowledges that mitigation measures beyond those embedded as part of the Proposed Development will be considered where such measures are deemed necessary. Consideration should also be given to the monitoring of dust complaints during construction and how this will be secured through the process. The Applicant should seek to agree mitigation measures and monitoring with relevant consultation bodies. Measures provided to mitigate impacts predicted through the assessment process should be clearly stated in the ES and secured in the draft DCO or other legally binding mechanism, as appropriate.

4.5 Landscape and Visual

(Scoping Report section 6.6)

ID	Ref/A	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.5.2	Paragraphs 6.6.1-6.6.7, 6.6.10, 6.6.14, and 6.6.26	LVIA consultees and study area	Reference is made to 'Landscape and Visual Impact Assessment (LVIA) consultees' and various elements of the landscape and visual aspect study that have been or will be agreed with them, but the consultees are not named. The Inspectorate expects the ES to confirm which consultees / stakeholders have been approached to agree the approach, and that any agreements reached are documented in the ES. The Applicant should keep the preferred study area under review as the design of the Proposed Development evolves, so that the introduction of any additional visually intrusive elements which may affect sensitive receptors can be properly taken account of in the assessment. The Applicant should make efforts to agree the study area with relevant consultation bodies before undertaking the assessment. The study area in the ES must be defined sufficiently so that all potentially significant effects are assessed.
4.5.3	Paragraph 6.6.7	Designated areas	The Applicant should take care to ensure that the ES correctly identifies relevant designated sites e.g. Suffolk Coast and Heaths Area of Outstanding Natural Beauty, not Suffolk Coast and Heaths Area of Natural Beauty.

ID	Ref	Other points	Inspectorate's comments
4.5.4	Paragraph 6.6.11	Landscape strategy	The ES should describe any landscape mitigation measures relied upon during the construction period as well as the operational period.
4.5.5	Paragraphs 3.3.2, 3.3.6 and 6.6.12	ZTV	The ES should define acronyms in the first instance e.g. ZTV is defined as Zone of Theoretical Vision in the Scoping Report whereas in Appendix 1A and the Guidelines for Landscape and Visual Impact Assessment (Third Edition) it is defined as Zone of Theoretical Visibility. The Inspectorate considers this likely to be an anomaly/oversight, however if there is any discernible difference this should be clearly explained in the ES. The Inspectorate expects that the ZTV for the Proposed Development will be established having regards to the proposed and relocated pylons for overhead lines.
4.5.6	Paragraph 6.6.15 and 6.6.25	Night-time lighting assessment	The assessment of impacts from night time lighting should include all elements of the Proposed Development, including the power station site, roads, campus accommodation, and any off-site associated development. The Inspectorate recommends that the ES include an assessment of light spill to local residents where this has the potential to lead to significant effects from disturbance during the construction and operational periods.
4.5.7	Paragraph 6.6.19 and 6.6.21	Potential effects	The Scoping Report includes a list of potential effects associated with the Proposed Development but this list should not be regarded as conclusive at this stage since the full extent of the Proposed Development has not yet been determined. The ES should identify and assess all potentially significant effects.
	n/a	Potential effects	The Inspectorate advises that the Applicant assess any significant effects arising from the potential impact of smoke and steam on amenity. Any visible plumes from aerial emissions should be described in the ES and included in the photomontages presented within the assessment of visual effects.

4.6 Terrestrial Ecology and Ornithology

(Scoping Report section 6.7)

ID	Ref/A	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.6.1	Paragraph 6.7.2	Update from 2014 Scoping Report	In addition to the other reasons stated in this Paragraph, the update to the approach should be in order to comply with the requirements of the 2017 EIA Regulations, and this should be made clear in the ES.
4.6.2	Paragraph 6.7.6 and 6.7.7	Study area	The Scoping Report refers to the previous approach presented in Appendix 1A of the coping Report. However, the Scoping Report does not explicitly state what approach will be adopted as of now. The Scoping Report also fails to explain why the study area for the off-site associated development is set at being a maximum of 5km and why it is set at 20km for the main development site. The ES should include information to explain how the ecological Zone of Influence (ZoI) has been determined. The Inspectorate notes the approach to define a ZoI (Paragraph 7.2.17 of Appendix 1A) is based on the extent of the anticipated impacts. The Applicant should also make effort to agree the approach to establishing the ZoI with relevant consultation bodies.
4.6.3	Paragraph 6.7.9,	Baseline, further surveys and studies	The Scoping Report states that 'a full suite' of ecological surveys will be undertaken in relation to the Two Village bypass and Sizewell Link

ID	Ref	Other points	Inspectorate's comments
	6.7.11 and 6.7.12		Road. The Inspectorate considers that a robust baseline should be established for the entire Proposed Development, including all the off-site associated development (as indicated by Paragraph 6.7.7). The Scoping Report does not provide a comprehensive list of specific surveys undertaken/in progress. The Inspectorate also notes that there is no commitment to undertake surveys for freshwater invertebrates, fish species including European eel, and invasive species. These surveys may be required in order to establish the likely significant effects of the Proposed Development. The Applicant should make effort to agree the extent to the survey effort required to inform the assessment in the ES. If specific surveys are not carried out against the advice of relevant consultation bodies the ES should provide the reasons for not doing so with reference to likely significant effects. The ES should include details of the location, methodology, timings, and findings of the ecological surveys undertaken. The Inspectorate advises that appropriate figures are included in the ES to present this information.
4.6.4	Paragraph 6.7.14	Assessment methodology	The Scoping Report states that terminology will be changed from 'Key Ecological Receptors' to bring the methodology in line with Chartered Institute of Ecology and Environmental Management (CIEEM) 2018 Guidelines for Ecological Impact Assessment. The Scoping Report does not explain how impacts to receptors of lower than 'medium' value will be assessed. The Inspectorate reminds the Applicant to ensure that sufficient regard is given to biodiversity as required by the NERC Act 2006 and the relevant NPSs, and that all receptors that could be significantly affected are assessed.
4.6.5	Paragraph 6.7.16	Assumptions and limitations	The Scoping Report states that the assumptions stated in Appendix 1A remain the basis for establishing the extent of effects from emissions to air and from release of pollutants to watercourses. However, no justification in support of these assumptions is provided or why they remain valid given the time which has elapsed. The

ID	Ref	Other points	Inspectorate's comments
			Inspectorate advises that the consideration of such effects is informed by the relevant, updated, assessments and appropriate cross reference is made in the ES.
4.6.6	Paragraph 6.7.17, Table 6.10	Potential impacts-identifying impacts and receptors	Table 6.10 of the Scoping Report presents elements of the Proposed Development to be scoped in for assessment in the ES. There are no elements identified as being scoped out. The Table fails to describe what (if any) specific impacts will be assessed instead referring the reader to information contained in Appendix 1A. The ES must set out what impacts could occur in each phase of the Proposed Development, describe the receptors that could be affected, and provide an assessment of effects where they could be significant. Justification must be provided should any identified impact be ruled out of further assessment in the ES.
4.6.7	Paragraph 6.7.18 - 24	Potential impacts- off-site associated development	The Scoping Report refers to the information presented in Appendix 1A and highlights some additional potential impacts. However, no justification is provided to explain the extent to which information in Appendix 1A remains relevant, in particular with regards to the off-site associated development where the proposals have changed. The relevant Paragraphs of Appendix 1A (7.2.38-7.2.39), as referred to in this section of the Scoping Report present information restricted to potential impacts at the main development site. The ES must consider potential impacts for the off-site associated development as well as the main development site and assess the ecological effects where these could be significant.
4.6.8	Paragraph 6.7.19	Potential impacts – designated sites	The Scoping Report states that no habitat loss will result from designated sites from the off-site associated development. No evidence is provided to support this conclusion. There is also limited information on any other impacts which could arise on designated sites. It is noted that the Proposed Development

ID	Ref	Other points	Inspectorate's comments
			lies within the Outer Thames Estuary SPA and adjacent to Minsmere to Walberswick Heaths & Marshes SAC and Minsmere-Walberswick SPA and Ramsar site. The response from Natural England in Appendix 2 identifies potential impact pathways to these sites and a number of other internationally and nationally designated sites, some of which are identified in Appendix 1A. The ES should include a full up to date description of the designated sites and habitats within the defined ZoI and provide an assessment of the impacts of the Proposed Development where significant effects could occur. The assessment should include consideration of how designated sites and other valuable habitats may be ecologically linked to each other when determining the likely significant effects on their ecology.
4.6.9	Paragraph 6.7.20	Potential impacts on watercourses	As well as the species identified, the crossing of watercourses could affect populations of other protected and valuable species if present, including fish species and aquatic invertebrates. Crossings also have the potential to impact on watercourse habitats and introduce barrier effects. These impacts should be assessed in the ES and where mitigation is proposed, within the design of any crossing structures, the ES should clearly reflect this in the description of the Proposed Development and indicate how the design will be secured.
4.6.10	Paragraph 6.7.26 - 6.7.28	Mitigation	Reference is made to a number of mitigation proposals which the Scoping Report suggests are embedded within the design of the Proposed Development, including the design of the Sizewell Marshes SSSI crossing, the re-alignment and water control measures on Sizewell Drain, drainage and lighting design, and proposals to retain, restore and create habitats. An unspecified solution to separate the main development site platform from the SSSI to avoid effects to hydrology and geology is also mentioned but not described. It is not clear how the measures described are captured by the description of the Proposed Development in the Scoping Report. The Inspectorate

ID	Ref	Other points	Inspectorate's comments
			reminds the Applicant to ensure that all mitigation relied on in the ES is adequately secured.
	Paragraph 6.7.26 – 6.7.28	Mitigation	Mitigation measures are described in overview, and not in relation to specific impacts. Therefore, it is difficult to understand from the information in the Scoping Report if or how the mitigation hierarchy has been applied. The Inspectorate would expect the Applicant to correctly apply the mitigation hierarchy and the ES to clearly explain how this process has been applied to the assessment.

4.7 Amenity and Recreation

(Scoping Report section 6.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.7.2	Paragraphs 6.8.9, 6.8.11 and 6.8.12	Study area – main development site and off-site associated development	The ES should include figures/ plans that depict the different study areas and sensitive receptors used in the assessment.
4.7.3	Paragraphs 6.8.21 and 6.8.24	Methodology	The Inspectorate notes that the criteria to establish the sensitivity of the identified receptors and magnitude of the impacts has been amended since the 2014 Scoping Report. The ES should clearly define which criteria have been used in describing the sensitivity of the receptors, the magnitude of the potential impacts and the significance. The ES should explain any reasons or limitations associated with the application of professional judgment.
4.7.4	Paragraph 6.8.27	Potential impacts – construction	Noting the impacts identified in Paragraph 6.8.27 of the Scoping Report, the Inspectorate recommends that the Amenity and Recreation ES assessment addresses potential impacts on ecologically sensitive sites from increased visitor pressure, with reference to the Terrestrial Ecology and Ornithology assessment where applicable.

ID	Ref	Other points	Inspectorate's comments
4.7.5	Paragraph 6.8.31	Mitigation	Paragraph 6.8.31 of the Scoping Report states that mitigation measures remain as set at Paragraphs 7.4.39 to 7.4.40 of Appendix 1A. The Inspectorate notes that the ES should include an up to date Right of Way and Open Access Strategy, that is developed in line with the objectives listed at Paragraph 6.8.31 of the Scoping Report.

4.8 Historic Environment

(Scoping Report section 6.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.8.2	Paragraph 6.9.4, 6.9.11	Separate Scoping Document for impacts to setting	This document has not been appended to the Scoping Report and the Scoping Report does not explain how it has been informed by it, including with regards to the study area which is noted in Paragraph 6.9.11 as remaining the same as stated in Appendix 1A. The Applicant should make effort to agree the scope of the assessment has been determined, with reference to any consultation with the relevant consultees.
4.8.3	Paragraph 6.9.8	Baseline surveys and studies	The ES should include details of the location, methodology, timings, and findings of the investigations undertaken. The Inspectorate advises that appropriate figures are included in the ES to present this information and that all supporting technical reports relevant to the assessment of significant effects are included in the ES or as an appendix.
4.8.4	Paragraph 6.9.34 to 6.9.38, Table 6.14	Potential Impacts – construction, operation, and reinstatement	The table describes the types of impacts anticipated for the elements of the Proposed Development to be scoped in for assessment in the ES, however it fails to identify specific impacts on identified receptors. The Table does identify any element of the Proposed Development to be scoped out. The Scoping Report provides no information regarding operational effects resulting from the off-site associated development. As noted above, the Scoping Report makes reference to a Settings Scoping Document which has been consulted upon, however no

			further detail is provided as to how this document has informed the approach to the assessment. The ES must describe the impacts to historic environment receptors and assess any likely significant effects that would occur. The assessment of likely significant effects should address impacts during operation across the entirety of the Proposed Development including the off-site associated development sites.
4.8.5	Throughout chapter	Historic Environment scope - terrestrial and marine	The Scoping Report does not explain if or how terrestrial and marine historic environment assessments will be presented in the ES. In the interests of clarity these comments apply to both the assessment of the terrestrial and the marine historic environment, and the Inspectorate expects both matters to be assessed in the ES.

4.9 Soils and Agriculture

(Scoping Report section 6.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	6.10.13	Physical effects on soils	As the physical effects on soils is to be assessed in the Geology and Land Quality ES chapter, the Inspectorate agrees that this matter can be scoped out of the Soils and Agriculture ES chapter.

ID	Ref	Other points	Inspectorate's comments
4.9.2	Paragraph 6.10.6 and 6.10.7	Baseline conditions	The Scoping Report refers to the recommendations in Appendix 1B for the approach to further Agricultural Land Classification (ALC) and describes a scope of further work developed in consultation with Natural England. The ES should include the locations of the further surveys/ sampling studies. The ES should include a detailed description of the baseline conditions for the entire Proposed Development and should set out how this information has been gathered.
4.9.3	Table 6:15, Paragraph 6.10.13, Paragraph 6.10.16	Methodology- determining significance	The Scoping Report states that a clear statement will be made as to whether effects are significant or not significant, based on the methodology in Table 5.3. Sensitivity criteria are provided in Table 6.15 but the Scoping Report refers to Appendix 1A for magnitude criteria. It is not clear how this Table includes magnitude criteria for the new construction impacts listed in Paragraph 6.10.16. The ES should describe how significance will be defined with reference to a relevant and clearly defined methodology.
4.9.4	6.10.17	Reinstatement of agricultural land	The Scoping Report provides limited detail on the reinstatement of agricultural land, The ES should describe the approach to reinstatement of agricultural land with sufficient detail addressing

ID	Ref	Other points	Inspectorate's comments
			details such as surface water features, the proposed drainage regime and the proposed reinstated land. The Scoping Report makes no reference to a Landscape Strategy and refers to how this was addressed in 2014 in Appendix 1A. If a Landscape Strategy is proposed, the strategy should include details related to comments made above. It should also be clear how such a strategy would be secured and delivered.
4.9.5	Paragraph 6.10.20	Mitigation	The Scoping Report suggests that "toolbox talks" will be implemented as a form of mitigation. The ES should include sufficient detail relating to the talks and explain the level of confidence that can be attached to them as a form of mitigation.
4.9.6	Paragraph 6.10.22	Methodology	The ES should assess impacts to all agricultural land and agricultural holdings where significant effects may arise from the Proposed Development. The percentage of agricultural land taken from agricultural holdings should also be calculated and provided in the ES, as well as the total area so that impacts can be clearly understood.
4.9.7	N/A	Development of agricultural land - alternatives	Justification should be given within the ES for any development on agricultural land. In the absence of a complete baseline being available it is not known if any Best and Most Versatile (BMV) land will be affected. Alternatives to avoid development on BMV agricultural land should also be explored and discussed within the ES.

4.10 Geology and Land Quality

(Scoping Report section 6.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	Paragraph 6.11.16	Effects on geology as a valuable resource	The Scoping Report proposes to scope out effects on geology as a valuable resource due to no statutory designated geological sites being identified within the study area (500m from the main development site). However, a clear definition of geology as a valuable resource has not been clearly defined in the Scoping Report. As the Scoping Report fails to provide a clear definition of geology as a valuable resource, the Inspectorate does not agree that geology as valuable resource can be scoped out of the assessment. This definition should be provided in the ES and an assessment made of effects on geology as a valuable resource where these could result in significant effects. However, the Inspectorate notes that as no statutory designated geological sites have been identified within the study area (500m from the main development site), effects on statutory designated geological sites within 500m from the main development site can be scoped out of the ES.
4.10.2	Table 6.17	Minor railway upgrade works and level crossing works	Table 6.17 of the Scoping Report proposes to scope out an assessment of the effects that may arise from minor railway upgrade works and level crossing works. However, as the Scoping Report has not provided details of the works or evidence that the works will not result in significant effects to geology and land quality, the Inspectorate does not agree that this matter can be scoped out of the ES. The ES should describe the minor works require to level crossings and assess any likely significant effects that may occur.

ID	Ref	Other points	Inspectorate's comments
4.10.3	Paragraph 6.11.9	Study area	Paragraph 6.11.9 defines the assessment study area in regard to paragraph 7.10.7 of Appendix 1A (the Scoping Report incorrectly references 1A instead of 1B) which only refers to the main development site and the coastline between Southwold to Orford Ness. Paragraph 6.11.9 states the study area is the area "within/500m from the red line boundary" but does not clearly state whether this includes all off-site associated development sites, or just the main development site. The ES should concisely describe the study areas for the main development site and off-site associated development sites. The Inspectorate also notes that the study area for the main development site has been reduced from 1km to 500m based on the surveys and investigations undertaken. The study areas should extend to the extent of anticipated likely significant effects and any evidence gathered to inform the study area chosen should be provided in the ES. The Inspectorate advises that effort is made to agree the study area with relevant consultation bodies.
4.10.4	Paragraph 6.11.11	Chemical Testing	The Scoping Report states that "limited testing data is available for the temporary construction area and the LEEIE" (Land East of Eastlands Industrial Estate) and omits reference to chemical tests being completed or proposed for the off-site associated developments. The assessment in the ES should be based upon relevant and up to date information, including chemical testing at all relevant locations. If chemical tests will not be undertaken at off-site associated development sites, the ES should justify this approach, state the assumptions/ uncertainties resulting from not undertaking chemical tests for the entirety of Proposed Development, and seek to agree this approach with the relevant consultation bodies.
4.10.5	Paragraph 6.11.11;	Ground investigation for off-site associated development	No evidence has been provided within the Scoping Report to support the conclusion that off-site associated development sites are at low

ID	Ref	Other points	Inspectorate's comments
	and 6.11.14;		risk from ground contamination. The ES should include evidence-based conclusions, and where no evidence is available, a robust justification that explains and accounts for uncertainty and assumptions applied in the assessment.
4.10.6	Paragraph 6.11.14; and 6.11.15	Baseline and ground investigation	The Inspectorate notes that Figure 7.10.1 of Appendix 1B depicts the locations of Phase 2 intrusive boreholes. The figure clearly shows that the boreholes are located within the proximity of the Sizewell C nuclear power station. As no ground investigations have been undertaken for the off-site associated development sites and no further ground assessments are proposed, there is no evidence to support the statement in Paragraph 6.11.14 of the Scoping Report that "the existing baseline is robust for the purpose of the assessment". The ES should include a robust baseline assessment that provides an accurate representation of the study area and seek to agree the ground investigation methodology with the relevant statutory body.
4.10.7	Paragraph 6.11.25	Excavation and management of soil	The ES should assess impacts to soil and address the need for a Soil Management Plan (SMP) to establish how soil will be stripped, stored, handled and treated/ remediated. The SMP should include sufficient detail regarding the methods to be applied and to give confidence as to the likely efficacy of such measures. The ES should state how the SMP will be secured, for example through a requirement in the dDCO.
4.10.8	Paragraph 6.11.26	Operation	Any anticipated maintenance activities which could significantly affect geology and soils should be described and assessed in the ES.
4.10.9	Paragraph 6.11.30	Removal and reinstatement	The ES should include a full assessment of the removal and reinstatement of the temporary works and associated land stating the anticipated significant effects and any required mitigation measures. If mitigation measures are required, the ES should state how the

ID	Ref	Other points	Inspectorate's comments
			measures will be secured through the draft DCO or other suitable legal mechanism.
4.10.10	Paragraph 6.11.32	Mitigation	The aspect chapter states no secondary mitigation measures (as defined by Scoping Report paragraph 5.4.4) are proposed at this stage of the process. If secondary mitigation measures are to be required, the ES should include a description of the measures, the anticipated efficacy of the measures, the resultant effects prior to, and post, implementation of the mitigation measures, and how the measure will be secured through the draft DCO or other legal mechanism. The ES should include a full description of any remediation which may be required and confirm how this is to be secured. The ES should assess any likely significant effects which could occur as a result of remediation. Any assumptions in this regard (for example, traffic movements, waste handling, and contaminated land) should be clearly stated in the ES.

4.11 Groundwater and Surface Water

(Scoping Report section 6.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.11.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.11.2	Paragraph 6.12.5; 6.12.6; and 6.12.7	Study area, surveys and assessments - groundwater	The study area is stated as being unchanged from that described in Appendix 1A for the ground water assessment. The Scoping Report does not clarify if the study area sufficiently accounts for the new boundary of the Proposed Development, although it does state that the off-site associated development will be included. The Applicant should ensure that the groundwater study area for the Proposed Development, includes the off-site associated development sites and is sufficient to capture the full extent of the anticipated likely significant effects. No updated version of Figure 7.11.1 has been provided showing the spatial extent of the groundwater monitoring survey work. The ES should justify the locations of the monitoring sites and explain how the monitoring sites robustly record and monitor groundwater applicable to the study area.
4.11.3	Paragraph 6.12.7	Study area, surveys and assessments - surface water	The 2014 study area (Appendix 1A) is referenced for the surface water assessment, however no updated information or figures are provided despite the changes to the Proposed Development. The Applicant should ensure that the surface water assessment study area for the Proposed Development, includes the off-site associated

ID	Ref	Other points	Inspectorate's comments
			development sites and is sufficient to capture the full extent of the anticipated likely significant effects. The ES should clearly explain the approach taken to determine the level of survey effort relevant to characterise and assess impact to surface water receptors. If significant effects to surface water are identified the ES should explain how effects will be mitigated and address the extent to which monitoring and subsequent remedial action is necessary.
4.11.4	Paragraph 6.12.11	Further surveys/ studies	The locations of the further surveys/ studies should be stated in the ES and/ or presented on a figure and the results of the surveys/ studies should be included in the ES.
4.11.5	Paragraph 6.12.17	Assessment methodology	An assessment of potential changes to agricultural drainage regimes in surrounding agricultural holdings that may arise from the Proposed Development's alteration of ground and surface water should be included in the ES, with cross reference to other chapters where applicable.
4.11.6	Paragraph 6.12.21; and 6.12.22	Construction impacts - groundwater	In addition to the potential effects described in Paragraphs 6.12.21 and 6.12.22 of the Scoping Report, the potential for construction activities to create new or exacerbate existing contamination pathways should be assessed and included in the ES.
4.11.7	Paragraph 6.12.21; and 6.12.22	Construction impacts – surface water	The Scoping Report refers to Paragraph 7.12.28 of Appendix 1A for a description of construction impacts. The design of the Proposed Development has since evolved. The ES should clearly state where existing ditches will be re-aligned and any proposals for the creation of drainage systems (including sustainable drainage systems (SuDS)) should be provided. The Inspectorate considers that the ES should include a figure to depict where re-alignment of drains and SuDS is required.

ID	Ref	Other points	Inspectorate's comments
4.11.8	Paragraph 6.12.27; and 6.12.28	Mitigation	The Scoping Report references the use of Water Management Zones (WMZ) to control flows as a potential mitigation measure but has not stated where the WMZs will be located. The locations of the WMZs should be included in the ES and presented on a figure, and if attenuation ponds are to be incorporated in the WMZs, the dimensions and locations of the attenuation ponds should also be included in the ES. Paragraph 6.12.28 of the Scoping Report states that "a control structure" is proposed in the realigned Sizewell Drain. No further information regarding the "control structure" is included in this chapter or in the project description in the Scoping Report. The ES should describe the control structure in the project description including where it will be located, how it will operate, and include environmental assessments where relevant within the technical assessments.
4.11.9	n/a	Road works – assessment methodology	The ES should have regards to recognised industry standard guidance to inform the assessment of the effect that the construction of new roads and re-alignments of existing roads will have on surface and groundwater e.g. that contained in the Design Manual for Roads and Bridges (DMRB). The Applicant should make every effort to agree the approach taken with relevant consultation bodies.
4.11.10	n/a	Minsmere – Walberswick Heath and Marshes SSSI	The Scoping Report does not address the potential for the Proposed Development to result in hydrological impacts to Minsmere – Walberswick Heath and Marshes SSSI. The ES should address whether impacts to this receptor are likely and assess any significant effects that may occur. The ES should also address whether monitoring of this sensitive receptor is necessary to enable ground and surface water changes to be identified and if necessary, determine the appropriate remedial measures.

ID	Ref	Other points	Inspectorate's comments
4.11.11	n/a	Leiston surface water management plan	The ES should consider the information included in the Leiston surface water management plan and explain the extent to which the Proposed Development is or is not compatible with it.
4.11.12	n/a	Impacts to water resources	The Scoping Report does not include information on the water requirements for the Proposed Development. The ES should state the source of the required water and assess adverse effects on water availability, including potable water where significant effects are likely.

4.12 Flood Risk

(Scoping Report section 6.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.12.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.12.2	Paragraph 6.13.8	Flood risk model boundary/ study area	The Scoping Report does not state the study area for the flood risk model boundaries used in the assessment. The ES should state the study area used and ensure the study extends to the extent of the anticipated significant effects. For clarity, the Applicant should consider including a figure depicting the study areas used for the flood risk assessment in the ES.
4.12.3	Paragraph 6.13.12 and Table 6.19	Site locations within flood zones	The 'site locations' for elements of the Proposed Development listed in Table 6.19 are not listed individually or clearly defined. The ES should accurately state which flood zones the development sites are located and provide a figure with the DCO application boundary mapped in relation to those flood zones.
4.12.4	Paragraph 6.13.15	Hydraulic modelling	The Scoping Report states that hydraulic monitoring will be undertaken for sites located or partly located in Flood Zones 2 and 3. The ES should list the sites where hydraulic modelling has been undertaken.
4.12.5	Paragraph 6.13.16	Channel surveys	The Scoping Report states that channel surveys will be undertaken in relation to the Two Village Bypasses proposed, Sizewell Link Road and Theberton as these sites cross a "main river". The Scoping Report does not clearly state if any other development sites cross "main rivers". The Applicant should undertake channel surveys at all main

ID	Ref	Other points	Inspectorate's comments
			river crossing locations. The ES should include a figure that depicts these locations.
4.12.6	Paragraph 6.13.27	Potential mitigation measures	The ES should explain the extent to which other reasonable alternatives to compensatory flood storage have been considered and set out reasons for or against implementation. If compensatory flood storage is required, the locations of the compensatory flood storage sites should be stated in the ES and presented on a figure. Furthermore, an assessment determining whether potential significant effects may arise from the creation of compensatory flood storage should be undertaken and included in the ES. If raising finished floor levels of structures is required to mitigate flood risk, the new floor level should be stated in the ES and included in assessments for all ES aspect chapters.
4.12.7	n/a	Flood defences	The Scoping Report makes very limited reference to coastal or fluvial flood defences eg Paragraph 3.3.6 of the Scoping Report states that "flood defences and coastal protection measures" will be a permanent element of the Proposed Development. The ES should describe any flood defence structures or measures relied upon in the assessment. The ES should include a figure to depict their location and assess any significant effects that may arise from in respect to flooding. The Scoping Report does not state what or how coastal protection measures will be implemented. The ES should describe all coastal protection measures and any potential effects likely to arise from the construction and operation of the coastal protection measures to flooding and other relevant aspect chapters.
4.12.8	n/a	Sequential test approach	Although nuclear power stations are exempt from the sequential/ exemption test, the ES should undertake a sequential test approach for the associated infrastructure to demonstrate that no reasonable

ID	Ref	Other points	Inspectorate's comments
			alternative location in a lower risk flood zone are could be utilised for the associated developments.
4.12.9	n/a	Worst case flood event	The ES should state whether the Proposed Development would be required to remain open and operational through a worst case flood event; and if so, the ES should demonstrate that the Proposed Development can safely remain open and operational during a worst case flood event.

4.13 Coastal Geomorphology and Hydrodynamics

(Scoping Report section 6.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.13.1	Paragraph 6.14.1	Off-site associated development impacts	The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This statement is not supported by evidence in the Scoping Report. Accordingly, the Inspectorate cannot agree to scope these matters out. The ES should assess impacts from off-site developments on coastal geomorphology and hydrodynamics where significant effects are likely to occur.
4.13.2	Paragraph 6.14.5	Thermal plumes	Thermal plumes are proposed to be scoped out of the assessment as they are considered not to affect coastal geomorphology or hydrodynamics, however, the Scoping Report provides no evidence to support this. The ES should assess impacts to geomorphology and hydrodynamics from the introduction of thermal plumes where significant effects are likely to occur. The ES should also address impacts that may occur as result of Sizewell B and Sizewell C operating together.

ID	Ref	Other points	Inspectorate's comments
4.13.3	Paragraph 6.14.5	Surveys	The Scoping Report provides limited detail on the surveys that have informed the assessment, the study area/ ZoI and knowledge of baseline conditions to date. The ES must provide all details of the surveys undertaken including (but not limited to) the methodology, locations, temporal scope, results and any modelling that has been used.

ID	Ref	Other points	Inspectorate's comments
4.13.4	Paragraph 6.14.8	Extent of study area	The Scoping Report does not explain how the study area will incorporate changes that are identified in the Flood Risk Assessment in relation to storm events. There is also no explanation as to why the seaward extent should be 4km in relation to engineering studies. Additionally, it is unclear whether the spring tide excursion and sediment cell account for storm events or potential future changes and future baselines. The landward extent should also consider future baselines and functionality of coastal habitats and species and therefore the study area is likely to reach beyond the Mean High Water Spring Tide. The ES must clearly define and justify the study area accounting for storm events and their potential reach along the coast. The impacts of climate change on the future baseline should also be considered.
4.13.5	Paragraph 6.14.12	Baseline conditions	The Scoping Report defines the rates of shoreline change as 'low' however, it is unclear on what scale this is defined. The ES must clearly describe the degree and extent of geomorphic and hydrodynamic processes within the study area in relation to an appropriate scale and provide details of the surveys or other evidence used to establish the baseline conditions
4.13.6	Paragraphs 6.14.27 and 6.14.28	Construction impacts	The Scoping Report mentions scour due to '*other elements of the marine and cross-shore infrastructure would be assessed'.* It is unclear which elements would be included in assessment from this definition. The ES must include and clearly define project elements (permanent and temporary) in the assessment with inclusion of the treatment of any waste arisings (such as from the proposed tunnel boring associated with the proposed cooling water intake and outfall structures).
4.13.7	Paragraphs 3.2.3, 3.2.5	Flood defence and coastal protection measures	With reference to Table 4.12 above, the ES should assess any significant effects on coastal geomorphology and hydrodynamics arising from the construction and existence of the proposed flood defence and coastal protection measures. The Inspectorate considers

ID	Ref	Other points	Inspectorate's comments
	and 6.14.27 and 6.14.28		that the implications of climate change, in respect of increased surface water run-off, higher sea levels, and proposed/existing coastal defences, should also be carefully considered in the ES.
4.13.8	Paragraph 6.14.25	Potential sensitive receptors	With reference to comment 4.13.4 above the receptors identified within the defined study area should include any heritage and ecological receptors, including designated sites, which could be significantly affected by the Proposed Development. Agreement should be sought to agree the receptors to be assessed with the relevant consultees.
4.13.9	Paragraph 6.14.14 to 6.14.16	Shoreline change modelling	The Scoping Report does not mention the proposed modelling of shoreline change and detailed modelling around proposed structures. The ES must assess significant effects associated with these matters and explain the approach that has been taken to modelling shoreline changes.
4.13.10	Paragraph 6.14.16	Detailed modelling	The Scoping Report determines that detailed modelling is not needed to inform the assessment of impacts on coastal geomorphology however, there is no justification to support this. The assessment in the ES should be underpinned by relevant baseline information and modelling where required. The ES should explain the approach to establishing the baseline and predicting the anticipated effects. If detailed modelling is required to support and inform this assessment it should be undertaken. The Applicant should make effort to agree the necessary baseline information and modelling with relevant consultation bodies.
4.13.11	6.14.28	Impacts on waves	The Scoping Report explains that dredging and the ploughing of sediment would lead to changes in bathymetry however, there is no mention of the potential resultant impacts on wave regimes. The ES must assess the impacts of bathymetric changes on wave regimes

ID	Ref	Other points	Inspectorate's comments
			and any consequential impacts to geomorphology and hydrodynamics.
4.13.12	Paragraphs 6.14.29 to 6.14.32	Capital and maintenance dredging operational impacts	It is not clear in the Scoping Report whether significant effects associated with the capital and maintenance dredging required to enable large loads will be. For the avoidance of doubt the ES should include this in the assessment.
4.13.13	Paragraph 6.14.29	Operational impacts from beach nourishment and recycling	Beach nourishment and recycling would be required during operation of the Proposed Development to protect the hard coastal defence, yet they are not listed under the potential operational impacts. The ES must assess impacts from beach nourishment on coastal geomorphology and hydrodynamics where significant effects are likely.

4.14 Marine Water Quality and Sediment

(Scoping Report section 6.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.14.1	Paragraph 6.15.1	Off-site associated development impacts	The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This assertion is not supported by evidence in the Scoping Report. Accordingly, the Inspectorate cannot agree to scope these matters out of the ES. The ES should assess impacts from off-site developments on marine water quality and sediment Where significant effects are likely.

ID	Ref	Other points	Inspectorate's comments
4.14.2	Paragraph 6.15.9	Definition and agreement of Zone of Influence and study area	The Scoping Report references Appendix 1A stating that the study area is largely unchanged but highlights the changes to the cooling water infrastructure proposed and the replacement of a jetty with a proposed Beach Landing Facility (BLF). Given the changes to the Proposed Development the Applicant should ensure that the study area remains appropriate with respect to the extent of sediment resuspension, transport and cooling water effluent impacts and chemical and thermal plumes. The Applicant should make effort to agree the approach with relevant consultation bodies. The ES should provide evidence of the level of agreement reached in this regard.
4.14.3	Paragraphs 6.15.6 to 6.15.8 and	Survey details /proposed further surveys	The Scoping Report provides an outline of the water quality surveys that have been completed and are proposed. A full account of the background sediment conditions and chemicals assessed is not included. Furthermore, there is a discrepancy between the dates of the surveys in paragraphs 6.15.6 and 6.15.10. The ES should avoid

ID	Ref	Other points	Inspectorate's comments
	6.15.10 to 6.15.14		any such discrepancies. The ES should also detail the characteristics/substances assessed, methodologies, locations, timings and results of surveys in order that a robust picture of the baseline conditions can be understood.
4.14.4	Paragraphs 6.15.33 to 6.15.43	Impacts from vessels	The Scoping Report identifies, in paragraph 6.15.34, that maintenance of the BLF will require maintenance dredging which could cause changes in suspended sediment, however, there is no reference to impacts that may occur as a result of marine traffic associated with the BLF, either during construction or operation. The ES must assess the potential for vessel pollution to impact marine water quality during construction and operation where effects could be significant.
4.14.5	Paragraph 6.15.24	Site drainage and other effluent	The Scoping Report identifies that groundwater and treated sewage effluent will discharge to the marine environment during the construction periods via a construction drainage system but this does not include site drainage discharge and other effluents prior to completion of the Combined Drainage Outfall (CDO) nor does it explain what environmental impacts are anticipated. The ES must include an assessment of significant effects associated with any discharges prior to the completion of the CDO.

4.15 Marine Ecology

(Scoping Report section 6.16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.15.1	Paragraph 6.16.1	Off-site associated development impacts	The Scoping Report states that off-site associated development is too remote from the marine environment and although theoretical pathways exist the potential impacts would be negligible. This assertion is not supported with evidence in the Scoping Report. Accordingly, the Inspectorate does not agree to scope this matter out. The ES should assess impacts from off-site developments on marine ecology where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.15.2	Paragraphs 6.16.41 to 6.16.51 and 6.4.4	Assessment of vibration impacts	Paragraph 6.4.4 states that an assessment of noise and vibration impacts to fish and other marine species will be presented in the Marine Ecology ES aspect chapter, however, there is no mention of vibration impacts in Section 6.16 of the Scoping Report. The ES should assess vibration impacts to fish and other marine species where significant effects are likely to occur, both alone and cumulatively with other developments. The assessment methodology and any necessary mitigation measures should be described, and effort made to agree the approach with relevant consultation bodies.
4.15.3	Paragraphs 6.16.15 and 6.16.19	Assessment of underwater noise	A proposed assessment methodology for the assessment of underwater noise has not been provided in the Scoping Report, although paragraph 6.16.19 indicates that it may involve use of acoustic thresholds. The ES should set out the potential sources of underwater noise, explain how underwater noise levels would be calculated and set out

ID	Ref	Other points	Inspectorate's comments
			the criteria for assessment. Where appropriate, species-specific methodologies should be utilised and the assessment should take into account the seasonality of potentially affected species. Any likely significant effects to sensitive marine ecology receptors should be assessed, both alone and cumulatively with other developments. Any measures to mitigate impacts from underwater noise should be described in the ES.
4.15.4	Paragraphs 6.16.13 and Table 6.25	Definition of sensitive receptors and impact pathways	Although some sensitive receptors are identified in the Scoping Report it is not explicitly stated what sensitive receptors will be considered for assessment in the ES. The ES should identify all sensitive receptors to be assessed and clearly identify the impact pathways; this should include marine ornithology.
4.15.5	Paragraphs 6.16.41 to 6.16.51	Assessment of impacts on receptors	The Inspectorate notes that some impacts only refer to a limited number of potential marine receptors and exclude others. For example, operational chemical discharge *'will be assessed in detail relative to potentially sensitive species in the ES'* which excludes assessment of impacts on habitats. It is also not always clear what receptors are being referred to, for example in Paragraph 6.16.41 it refers to a *'primary receptor'* which is not defined in the Scoping Report. The ES should assess impacts to marine sensitive receptors where significant effects may occur.
4.15.6	Paragraphs 6.16.41 to 6.16.51	Assessment of impacts from vessels	Construction and operation of the Proposed Development will lead to an increase in marine traffic. No impacts to marine ecology receptors have been considered in terms of potential displacement, noise and vibration, anchor and collision risk, suspended sediment and pollution in relation to this increase although this is referred to in section 6.17 on Marine Navigation. An assessment of potential impacts from vessels on marine ecology must be included in the ES.

ID	Ref	Other points	Inspectorate's comments
4.15.7	Paragraphs 3.2.3, 3.2.5 and 6.16.41 to 6.16.51	Flood defence and coastal protection measures	It is stated in the Scoping Report that construction and management activities include flood defence and coastal protection; these activities and structures are not mentioned in the potential construction and operational impacts on marine ecology. Definition of what these measures are and an impact assessment on marine ecology from the construction and maintenance of these protection measures must be included in the ES.
4.15.8	Paragraph 6.16.14	Further surveys	The Scoping Report states that '*work is underway in 2019 to predict impingement effects on fish species'* however, no details of this further work are provided. The ES must provide details for all surveys that have informed the assessment including methodologies, timings, and spatial extent.
4.15.9	Section 6.16	Maintenance	No information is provided on maintenance activities and whether/what potential impacts these might have on marine ecological receptors. The ES must define what maintenance activities will be necessary for the Proposed Development and assess any significant effects which arise from potential impacts on marine ecological receptors.
4.15.10	Paragraphs 6.16.52 and 6.16.53	Securing mitigation	Reference is made to proposals to deliver embedded mitigation to reduce fish mortality. The Inspectorate advises that all mitigation relied on in the ES must be adequately secured via the draft DCO or other legal mechanism.
4.15.11	Paragraphs 6.16.46 to 6.16.51	Fish recovery and return system	The Scoping Report does not address the proposed approach to the assessment of impacts from the fish recovery and return system although this has the potential to result in mortality and indirect effects on other species groups (e.g. birds). The ES should include an assessment of impacts from the fish recovery and return system on sensitive receptors where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.15.12	Paragraphs 6.16.46 and 6.16.47	Entrapment assessment	The Scoping Report proposed to assess impacts from impingement and entrainment separately. It is considered that this may underestimate the total potential population loss for any given species. The ES should present the assessment of effects combining these impacts to ensure a robust assessment of entrapment which accounts for biomass and abundance of relevant species populations. The Applicant should make effort to agree the approach with relevant consultation bodies.
4.15.13	Paragraphs 6.16.41 to 6.16.45	UXO impacts during construction	The Scoping Report explains that an Unexploded Ordnance (UXO) Disposal Campaign has not been ruled out in relation to preparation of marine activities. The ES should therefore assess potential impacts on marine ecology from UXO during construction applicable to the anticipated disposal campaign.
4.15.14	Paragraphs 6.16.46 to 6.16.51	Impacts on/resulting from jellyfish and ctenophore blooms	Seasonal jellyfish blooms and ctenophores occur in the Sizewell area bringing potential risk to blocking the cooling water system. An assessment of the likely significant effects relating to the Proposed Development and impacts to jellyfish/ctenophores should be carried out in the ES.
4.15.15	Paragraph 6.16.20	Duration of impacts	The ES should assess the duration of impacts in relation to the ecological cycles (eg life cycles, breeding seasons) of the receptors being assessed.
4.15.16	Paragraphs 6.16.33 to 6.16.36	Commercial Fisheries	Whilst it is appropriate to assess the impacts of the Proposed Development on fish as an ecological receptor, impacts on commercial fisheries is considered to also represent a socio-economic matter to be addressed through assessment. The ES should assess impacts on fish and commercial fisheries as in terms of both their ecological and socio-economic value.

4.16 Marine Navigation

(Scoping Report section 6.17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.16.1	Paragraph 6.17.17	Off-site associated development impacts	The Scoping Report states that the off-site associated development of the Proposed Development do not have the potential to impact the marine environment and is therefore scoped out of assessment. In the case of effects on marine navigation the Inspectorate considers that significant effects are unlikely to result from the off-site associated development and agrees to scope this matter out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.16.2	Paragraphs 6.17.9 to 6.17.13	Number of vessels	The ES should identify the anticipated type and number of vessel movements generated by the development during the construction and operation phases and assess the potential impact to other existing vessel movements in the area. Cross-reference also should be made to the Transport section of the ES.
4.16.3	Paragraph 6.17.19	Operational disturbance impacts on fishing and recreational vessels	The operation of the BLF has potential to cause disturbance to fishing and recreational activities through collision and displacement. These impacts must be assessed where a likely significant effect would occur.

4.17 Radiological Assessment

(Scoping Report section 6.18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.17.1	Paragraph 6.18.1	Groundwater	The Scoping Report does not provide adequate information to support a decision to scope this matter out. The ES should describe the proposed approach to manage disposal and/or discharge to groundwater and measures employed to protect groundwater resources. Any significant effects associated should be assessed, and any mitigation measures proposed should be appropriately defined and secured.
4.17.2	Paragraph 6.18.1	Management of solid radioactive waste or spent fuel	The Scoping Report states that the management of solid radioactive waste or spent fuels is not assessed in this aspect and is instead described in Paragraphs 3.12.7 to 3.12.14 of the Scoping Report. However, these paragraphs do not describe where this matter will be assessed in the ES. The Inspectorate does not agree that this matter can be scoped out of the ES and should be addressed in either the ES radiological assessment chapter or elsewhere.
4.17.3	Paragraph 6.18.1	Radiological impacts from decommissioning	The Scoping Report states that the assessment remains broadly unchanged from Section 7.17 of Appendix 1A. Appendix 1A states that the radiological impacts from decommissioning "are assumed to be bounded by the routine operational activities and therefore not detailed further." As the Scoping Report has not provided evidence that radiological impacts from decommissioning will bound by operational activities; the Inspectorate does not agree this matter can be scoped out of the ES and an assessment of the radiological impacts from decommissioning should be assessed included in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.17.4	Paragraph 6.18.1	Off-site associated development	The Scoping Report states that the assessment remains broadly unchanged from section 7.17 of Appendix 1A. Appendix 1A states that "there are no radiological impacts expected with any of the off-site associated development sites" as "no radioactive disposal will take place from these locations during construction or operation". The Inspectorate agrees to scope out radiological impacts from these areas; on the understanding that effects arising through the transportation of radioactive material will be assessed as part of the assessments associated with the main development site as stated in Paragraph 6.18.1 of the Scoping Report.
4.17.5	Paragraph 6.18.1	Health implications	The Scoping Report states that the assessment remains broadly unchanged from section 7.17 of Appendix 1A. Appendix 1A states that health implications will be assessed in the Health Impact Assessment aspect chapter. The Inspectorate is satisfied that this matter can be scoped out of the radiological assessment chapter of the ES on the basis that the assessment will be included within the Health and Wellbeing ES chapter, as described in Section 6.22 of the Scoping Report.

ID	Ref	Other points	Inspectorate's comments
4.17.6	Paragraph 6.18.3; 6.18.4; and 6.18.15	Study area	The study area used for the assessment is unclear. Appendix 1A states the surveys undertaken to inform the assessment baseline is "around the Sizewell C Main Development Site" but does not provide a concise definition of the study area. The ES should state the study areas used to inform the assessment baseline surveys. For surveys that will be undertaken to assess potential radiological effects, the study area should extend to the extent of the likely significant effects.

ID	Ref	Other points	Inspectorate's comments
4.17.7	Paragraph 6.18.3	Baseline surveys	The Scoping Report makes no reference to undertaking updated baseline surveys. If new baseline surveys are not required, the ES should demonstrate that the existing surveys are sufficient to result in a robust baseline assessment.
4.17.8	Paragraph 6.18.4	Protection standards	Paragraph 6.18.4 of the Scoping Report states that the radiological impact assessment will be undertaken having regard to the legally established and recognised protection standards but has not stated which standards will be used. The ES should state which legally established and recognised protection standards will be used to inform the radiological assessments.
4.17.9	Paragraph 6.18.4	Methodology	The methodology followed for the radiological assessment should include overall radiological impact taking into account historical, present and future discharges and direct radiation to the surrounding environment, including human health and ecological effects. The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies including Public Health England (PHE).

4.18 Major Accidents and Disasters

(Scoping Report section 6.19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.18.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.18.2	Paragraphs 6.19.6 and 6.19.9	2014/52/EU Directive on the Assessment of the Effects of Certain Public and Private Projects on the Environment	The reference in Article 14 of the Directive is to 'Community' rather than 'community'. Article 15 of the Directive is also relevant and should be referred to in the ES. Article 15 refers to 'vulnerability (exposure and resilience)' which should be taken into account in the preparation of the assessment.
4.18.3	Paragraphs 6.19.14-6.19.17	Planning policies	The ES should refer to relevant local planning policies as well as national policies.
4.18.4	Paragraphs 6.19.19 and 6.19.20	Stakeholder engagement	The outcome of the stakeholder engagement should be summarised in the assessment in the ES, which should also demonstrate how these outcomes have informed the assessment.
4.18.5	Paragraphs 6.19.22 and 6.19.43	Use of professional judgement	Where professional judgement is applied in the assessment, this should be made clear in the ES, and the implications of any limitations to the assessment should be discussed.
4.18.6	Paragraphs 6.19.23 and 6.19.27	Baseline information and surveys	The baseline information presented within other technical assessments may not be sufficient to undertake the assessment of major accidents and disasters, and the Inspectorate expects the Applicant to undertake an analysis of any gaps in the information and

ID	Ref	Other points	Inspectorate's comments
			carry out any further studies and surveys if required. The details of any further studies should be provided in the ES. Factors influencing potential changes to the baseline in the future should also be considered and reported in the ES.
4.18.7	Paragraph 6.19.32	Reasonable worst case scenario	The ES should include criteria against which impacts will be assessed to establish the worst case scenario for each risk.
4.18.8	Paragraph 6.19.39	ALARP	To avoid the need for cross referencing to other topics, the definition of as low as reasonably possible (ALARP) should be included within the aspect chapter or in a glossary.
4.18.9	Paragraph 6.19.43 and 6.19.44	Definition of significance	The Scoping Report provides a definition of a significant adverse effect but also refers to 'tolerability criteria of MA&D hazards established within existing guidance documents to conclude whether an effect is considered to be significant.' In this regard, the Inspectorate expects that guidance documents referred to will be relevant to the particular hazards under consideration. The Applicant should make effort to agree the approach to defining significance with relevant consultation bodies in this regard.
4.18.10	Paragraphs 6.19.47-6.19.48, 6.19.49-6.19.50	Potential construction and operational impacts	For both construction and operation, incidents from surrounding land uses are defined as risks in the Scoping Report. However, major hazards may arise from uses more distant from the site and should also be taken into account. The lists of potential construction and operational impacts cannot be regarded as conclusive at this stage and the potential for further impacts should not be discounted in the assessment. The ES should take into account incidents and accidents at relevant similar facilities that have occurred both in the UK and abroad (as required by the Control of Major Accident Hazard Regulations 2015)

ID	Ref	Other points	Inspectorate's comments
			to ensure that lessons learned are incorporated in the assessment (where appropriate).
4.18.11	Paragraphs 6.19.57	Community Safety Management Plan	The approach to the preparation and maintenance of the Community Safety Management Plan should explained in the ES and be appropriately secured through the DCO or other legally binding mechanism.

4.19 Waste Management

(Scoping Report section 6.20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.19.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.19.2	Paragraphs 6.20.19 – 6.20.24; 6.20.33 – 6.20.36	Anticipated quantities of waste	The ES should quantify the anticipated volumes of waste by type (including the potential hazardous waste arising) and explain how these figures have been determined.
4.19.3	Paragraphs 6.20.41 - 6.20.43	Management Plans	It is stated that impacts would be mitigated through the use of a Construction Environmental Management Plan (CEMP), Site Waste Management Plan (SWMP) and a Materials Management Plan (MMP). Draft/ outline copies of these documents including the minimum details necessary to demonstrate efficacy should be appended to the ES. The ES should state how material and waste management measures included in the CEMP, SWMP and MMP will be secured with reference to specific dDCO requirements or other legally binding agreements.
4.19.4	Paragraph 6.20.42	SWMP	The SWMP should set out the arrangements that are proposed for managing any waste produced that cannot be recycled or reused on site. The SWMP should include information on the proposed waste recovery and disposal system for all waste generated by the Proposed Development, including details of the alternatives considered. It

ID	Ref	Other points	Inspectorate's comments
			should demonstrate that the options chosen are the most sustainable for the waste stream.
4.19.5	n/a	Transportation of waste	As identified in Table 4.2 (comment 4.2.19) above, the ES should assess any likely significant effects which could occur as a result of the transport of waste. The waste management assessment within the ES should clearly explain any assumptions made, for example the estimated quantities and types of materials required to be transported. Cross reference should be made to the Transport chapter of the ES, as appropriate.
4.19.6	n/a	Cumulative impacts	The ES should assess the potential for cumulative impacts with other developments where significant effects are likely (including the Scottish Power Renewables developments), particularly in terms of the transport and disposal of construction waste.

4.20 Climate Change

(Scoping Report section 6.21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.20.1	Paragraph 6.21.40	Green House Gas (GHG) impact assessment – decommissioning of the main site	The Scoping Report states that the decommissioning of the main site is scoped out of the GHG assessment due to being covered in a separate ES. The Inspectorate agrees that this matter can be scoped out of the ES on the basis that an ES for decommissioning of the main site is secured through the DCO or other suitable legal mechanism.
4.20.2	Paragraph 6.21.62	GHG assessment – emission sources that are >1%	The Inspectorate agrees that emission sources of >1% can be excluded from the GHG assessment due to this approach being in accordance with guidance PAS 2050:2011.
4.20.3	6.21.88	Climate Change Resilience (CCR) – removal and reinstatement	The Scoping Report proposes to scope out the reinstatement of parts of the off-site associated development to their existing land use from the CCR. However, as the Proposed Development has the potential to alter flood risk to off-site associated development locations due to the change in land use and surface and groundwater flows, the Inspectorate does not agree that this matter can be scoped out of the ES, and the CCR should include an assessment of the reinstatement of parts of the off-site associated development.

ID	Ref	Other points	Inspectorate's comments
4.20.4	Paragraph 6.21.48	CCR future baseline	The CCR future baseline should take into consideration future changes to coastal erosion and the effect this could have on flooding and storm surges affecting the Proposed Development.

ID	Ref	Other points	Inspectorate's comments
4.20.5	Paragraph 6.21.68 and Plate 6.1	CCR assessment methodology	The abbreviations in Plate 6.1 have not been defined or included within the abbreviation list in the Scoping Report. The ES should ensure all abbreviations are written out in full. Where mitigation/ adaption measure are required, a full description of the measures and their efficacy should be included in the ES.
4.20.6	Table 6.44	Potential sources of GHG emissions	The potential sources of GHG emissions should include the emissions released by the temporary worker campus including the associated CHP plant and the temporary worker accommodation caravan site as defined in Scoping Report Paragraph 3.2.10 and 3.2.11 respectively.

4.21 Health and Wellbeing

(Scoping Report section 6.22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.21.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.21.2	Paragraphs 6.22.13 and 6.22.15 Plate 6.2 6.22.33	Errors in text	A number of references within this chapter appear to be broken, showing "Invalid Source Specified". It should be ensured that the references within the ES work and link to the correct document.
4.21.3	Paragraph 6.22.18	Study area and approach to the assessment	All of the health determinants which may be impacted should be listed, and these should be shown on separate plans. The ES should outline how the study areas of the health assessment have been arrived at and what information the assessment has been based on. The information gathered to inform the assessment must be presented comprehensively within the Health and Wellbeing Chapter, with appropriate cross-reference to the supporting technical information associated with other assessments where applicable.
4.21.4	Paragraph 6.22.22 to 6.22.24	Methodology	The Inspectorate notes that qualitative information and quantitative information will be used in the assessment but advises that the temporal scale (clearly defined), geographical scale, and relative magnitude of all impacts must be clearly described in the ES as part of the assessment of significance of effects.

ID	Ref	Other points	Inspectorate's comments
4.21.5	N/A	Indirect impacts	New energy infrastructure may affect the composition, size and proximity of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport or the use of open space for recreation and physical activity. The impacts of the Proposed Development from these matters should also be assessed in the ES where significant effects are likely.

4.22 Inter-relationships and Cumulative Effects

(Scoping Report section 5.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.22.1	Paragraph 5.5.4	Inter-related effects - negligible residual effects	The Inspectorate notes the intention to exclude negligible residual effects from the assessment of inter-relationship effects and questions this approach. The Inspectorate considers that two or more negligible effects could combine to result in more severe effects and that this should be addressed within the ES. The methodology applied should be fully explained in the ES with clear cross-referencing to the relevant technical assessment chapters.
4.22.2	N/A	Cumulative effects - Separately consented components of the Proposed Development	These interactions are not mentioned in Section 5.5; however, the Inspectorate considers them to be of high relevance given the nature of the Proposed Development. Notwithstanding the advice in 3.3.4 of this opinion regarding assessment of the Proposed Development as a whole, the assessment of cumulative effects within the ES should include an assessment of separately consented components of the Proposed Development as well as 'other' development. Further information is provided on Page 6 of the Inspectorate's Advice Note Seventeen: Cumulative effects assessment (2015).
4.22.3	N/A	Cumulative effects - Sizewell B Relocated Facilities	The Scoping Report does not identify whether cumulative effects may arise with the works to relocate facilities associated with Sizewell B, described in Paragraphs 3.2.6 to 3.2.8 of the Scoping Report. The Scoping Report states that the construction periods of the Sizewell B Relocated Facilities works and the Proposed Development will overlap. Accordingly, the potential exists for effects to combine and therefore the ES must assess the likely significant cumulative effects of these works with the Proposed Development.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.22.4	N/A	Cumulative effects - Interaction with Sizewell A	The Scoping Report does not provide a scope for the cumulative assessment, and therefore it is not clear whether the decommissioning of Sizewell A will be considered. The ES should set out how this project interacts with the Proposed Development and make an assessment of the likely significant cumulative effects.

ID	Ref	Other points	Inspectorate's comments
4.22.5	Paragraphs 5.5.2 and 5.5.4	Inter-relationship effects - general	The Inspectorate advises that inter-relationships between aspects (for example but not limited to: radiological effects and human health; changes to air quality and ecological effects; soils and geology and flood risk; visual effects and effects on heritage assets) are assessed within each aspect chapter with cross reference to other technical assessments as appropriate. In line with Advice Note 17, the cumulative effects assessment should focus on cumulative effects arising from other development (and other components of the Proposed Development which are to be consented separately). The Inspectorate notes the definition of inter-relationship effects provided and advises that the ES make it clear how effects may combine together eg how multiple effects may act together on an individual receptor.
4.22.6	Paragraph 5.5.8	Cumulative effects - Criteria for screening out 'other' development	The Inspectorate notes the information in this section and has no specific comments on the criteria provided, however it will be important for the ES to document the screening process adopted. It is not entirely clear from the Scoping Report where this exercise fits into the four-stage approach recommended in Advice Note Seventeen, and this should be clarified in the ES. With reference to Paragraphs 5.5.9 and 5.5.10 the Inspectorate advises that every effect is made to agree both the long list and short

ID	Ref	Other points	Inspectorate's comments
			list of 'other' development with the local planning authorities and other statutory consultees.
4.22.7	N/A	Cumulative effects - scope	The ES should include a list of the other plans or projects taken forward into the detailed assessment of cumulative effects. Figures at an appropriate scale, with appropriate cross-referencing to this list would be a useful inclusion in the ES and the Inspectorate recommends that these are included. The Inspectorate recommends that the scope of the assessment is discussed with the local planning authorities and effort is made to seek agreement with them on the list of plans and projects to be included.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus[2]
- Planning Inspectorate advice notes[3]:
  - Advice Note Three: EIA Notification and Consultation;
  - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
  - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
  - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
  - Advice Note Nine: Using the 'Rochdale Envelope';
  - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
  - Advice Note Twelve: Transboundary Impacts;
  - Advice Note Seventeen: Cumulative Effects Assessment; and
  - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

---

[2] The Planning Inspectorate's pre-application services for applicants. Available from: https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/

[3] The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[4]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Ipswich and East Suffolk Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The Historic Buildings and Monuments Commission for England (OFFSHORE ONLY)	
The relevant fire and rescue authority	Suffolk Fire and Rescue
The relevant police and crime commissioner	Suffolk Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Benhall Parish Council
	Blaxhall Parish Council
	Bramfield and Thorington Parish Council
	Bromeswell Parish Council
	Bucklesham Parish Council
	Coddenham Parish Council
	Darsham Parish Council
	Eyke Parish Council

[4] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Farnham with Straford St Andrew Parish Council
	Friston Parish Council
	Hacheston Parish Council
	Kelsale cum Carlton Parish Council
	Kirton Parish Council
	Knodishall Parish Council
	Leiston-cum-Sizewell Town Council
	Levington and Stratton Hall Parish Council
	Little Bealings Parish Council
	Little Glemham Parish Council
	Marlesford Parish Council
	Melton Parish Council
	Middleton-cum-Fordley Parish Council
	Nacton Parish Council
	Otley Parish Council
	Pettistree Parish Council
	Saxmundham Parish Council
	Theberton and Eastbridge Parish Council
	Trimley St. Martin Parish Council
	Ufford Parish Council
	Westerfield Parish Council
	Wickham Market Parish Council
	Woodbridge Town Council
	Yoxford Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Environment Agency	The Environment Agency
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - Colchester
The Marine Management Organisation	Marine Management Organisation
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Suffolk County Council
The relevant strategic highways company	Highways England
The relevant internal drainage board	East Suffolk Internal Drainage Board
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission
The Secretary of State for Defence	Ministry of Defence
The Office for Nuclear Regulation (the ONR)	The Office for Nuclear Regulation

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[5]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Ipswich and East Suffolk Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Essex and Suffolk Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd

[5] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
Electricity Generators with CPO Powers	Galloper Wind Farm Limited
	East Anglia One Limited
	East Anglia Three Limited
	EDF Energy Nuclear Generation Limited
	Greater Gabbard Offshore Winds Limited
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	Greater Gabbard OFTO Plc
	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))[6]

LOCAL AUTHORITY[7]
Babergh District Council
Breckland District Council
Cambridgeshire County Council
East Suffolk Council
Essex County Council
Ipswich Borough Council
Mid Suffolk District Council
Norfolk County Council
South Norfolk District Council
Suffolk County Council
The Broads Authority

6 Sections 43 and 42(B) of the PA2008

7 As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY[7]
West Suffolk Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cambridgeshire and Peterborough Combined Authority
Royal National Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Anglian Water
Cadent Gas
Darsham Parish Council
East Suffolk Council (joint response with Suffolk County Council)
Environment Agency
ESP Utilities Group (on behalf of ESP subsidiary companies)
Essex County Council
Fulcrum Pipelines Limited
Harlaxton Gas Networks Ltd.
Historic England
Ipswich Borough Council
Kelsale cum Carlton Parish Council
Leiston-cum-Sizewell Town Council
Little Bealings Parish Council
Marine Management Organisation
Maritime and Coastguard Agency
Marlesford Parish Council
Melton Parish Council
Middleton-cum-Fordley Parish Council
Ministry of Defence
National Air Traffic Service
National Grid

Natural England
Network Rail
Norfolk County Council
Northumbrian Water Limited (on behalf of Essex and Suffolk Water)
Office for Nuclear Regulation
Pettistree parish Council
Public Health England
Saxmundham Parish Council
South Norfolk Council
Suffolk County Council (joint response with East Suffolk Council)
Theberton and Eastbridge Parish Council
Ufford Parish Council
Westerfield Parish Council
Wickham Market Parish Council
Yoxford Parish Council

Strategic Planning Team
Water Resources
Anglian Water Services Ltd
Thorpe Wood House,
Thorpe Wood,
Peterborough
PE3 6WT

Tel (0345) 0265 458
www.anglianwater.co.uk

Your ref
EN010012-000670

Gail Boyle,
EIA and Land Rights Advisor
on behalf of the Secretary of State
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Also by email to: SizewellC@planninginspecorate.gov.uk

.

20 June 2019

Dear Ms Boyle,

EDF Energy - Sizewell C Nuclear Power Station
Environmental Statement Scoping Report

Thank you for the opportunity to comment on the scoping report for the above project submitted pursuant to Regulation 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Anglian Water is the appointed waste water undertaker for the above site, but does not provide potable water services.

The following response is submitted on behalf of Anglian Water and relates to waste water assets.

General comments

Anglian Water would welcome further discussions with EDF Energy prior to the submission of the Draft DCO for examination.

In particular it would be helpful if we could discuss the following issues:

- Wording of the Draft DCO, including protective provisions specifically for the benefit of Anglian Water.
- Requirement for any waste water connections.
- Adequate protection of access to the Yoxford Water Recycling Centre during construction phases.

Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6YJ
Registered in England
No. 2366656.

an AWG Company

- Impact of development on any other of Anglian Water's assets and the need for mitigation.

- Pre-construction surveys.

Proposed Scheme

Reference is made to the diversion of statutory undertaker's equipment being one of the assumptions for the EIA process. There are existing waste water pipes in Anglian Water's ownership which potentially could be affected by the development. It is therefore suggested that the Environmental Statement should include reference to existing assets in Anglian Water's ownership.

In particular, near to the proposed development is the **Yoxford – Middleton Water Recycling Centre** . The Applicant is aware of this asset.
The Applicant must ensure there is no disruption to the access to this site during or after the construction phases. Access is required at all times in order to operate and maintain this asset in accordance with our Statutory duty.

We would welcome further discussions in relation to the implication of the above.

It is therefore suggested that the Environmental Statement should include reference to this asset and any other associated pumping stations, rising mains and outfalls.

Maps of Anglian Water's assets are available to view at the following address:

http://www.digdat.co.uk/

Ground conditions and hydrology

Reference is made to the site having areas of surface water within the site boundary.

Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water sewer systems. At this stage it is unclear whether there is a requirement for a connection(s) to the public sewerage network for the above site or as part of the construction phase.

Discussions with Anglian Water should be undertaken relating to any potential or intended connections to the public sewerage network of surface water.

Consideration should be given to all potential sources of flooding including sewer flooding (where relevant) as part of the Environmental Statement and related Flood Risk Assessment.

We would suggest that reference is made to any relevant records in Anglian Water's sewer flooding register as well as the flood risk maps produced by the Environment Agency. This information can be obtained by contacting Anglian Water's Pre-Development Team. The e-mail address for this team is as follows: (planningliasion@anglianwater.co.uk).

Anglian Water understands that the intention is for the Applicant to manage the disposal and treatment of waste water via its own private, on site water recycling centre.
If, there is a requirement for a connection to the Anglian Water waste water network for waste water treatment, a pre planning application should be made to Anglian Water, via this same e mail address, (planningliasion@anglianwater.co.uk) to determine the ability to provide such connections, without network reinforcement and to ensure that a connection is provided based upon the specifics of the Applicant's drainage strategy

Should you have any queries relating to this response, please let me know.

Yours sincerely,

Kathryn Taylor

Major Infrastructure Planning Manager
Ktaylor4@anglianwater.co.uk

From: [redacted]
To: SizewellC
Subject: Cadent and National Grid Plant Enquiry Response - Your Ref: EN010012-000670 ESRI- PART TWO (BK) Our Ref: EA_GE4B_3NWP_018271
Date: 19 June 2019 15:56:03
Attachments: [redacted]

DO NOT REPLY TO THIS MAILBOX AS IT IS NOT MONITORED

If you need to contact Plant Protection e-mail plantprotection@cadentgas.com Call 0800 688 588

Did you know you can do your own search by logging on and registering at www.beforeyoudig.nationalgrid.com

Please note: as this enquiry is so large the response may not be clear, please use the following links to view smaller sections in better detail

Please use the following link to gain plans of our assets: https://mapsviewerportal.com/

Please find a link to National Grid Electricity and Gas Transmission data on our web site.

http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/gas-network/ GAS

http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/electricity-network-overhead-lines/ OHL

http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/electricity-network-underground-cables/ UGC

Formal Planning Application - Your Ref: EN010012-000670 ESRI- PART TWO (BK) Our Ref: EA_GE4B_3NWP_018271

Thank you for your enquiry which was received on 11/06/2019.

Please refer to the attached documentation for Cadent and National Grid's response.

Self-service for Plant Enquiries: www.beforeyoudig.nationalgrid.com

If you need to contact the Plant Protection Team regarding your enquiry, please use the following details:

Email: [redacted]
Address: Plant Protection

Cadent
Block 1; Floor 1;
Brick Kiln Street
Hinckley
LE10 0NA
Telephone: +44 (0)800 688 588

National Gas Emergency Number:

0800 111 999*

National Grid Electricity Emergency Number:

0800 40 40 90*

* Available 24 hours, 7 days/week. Calls may be recorded and monitored.

********** This e-mail and any files transmitted with it, are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error, please reply to this message and let the sender know.

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

Please ensure you have adequate virus protection before you open or detach any documents from this transmission. Cadent Gas Limited does not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

Cadent Gas Limited is a limited liability company, registered in England and Wales (registered no. 10080864) with its registered office at Ashbrook Court, Prologis Park, Central Boulevard, Coventry CV7 8PE.

Plant Protection
Cadent
Block 1; Floor 1
Brick Kiln Street
Hinckley
LE10 0NA
E-mail: plantprotection@cadentgas.com
Telephone: +44 (0)800 688588

National Gas Emergency Number:
0800 111 999*

National Grid Electricity Emergency Number:
0800 40 40 90*
* Available 24 hours, 7 days/week.
Calls may be recorded and monitored.

www.cadentgas.com

Gail Boyle
Planning Inspectorate
The Planning Inspectorate
Room 3C
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 19/06/2019
Our Ref: EA_GE4B_3NWP_018270
Your Ref: EN010012-000670 ESRI- PART ONE
RE: Formal Planning Application, Sandy Lane, Leiston Common, Leiston

Thank you for your enquiry which was received on 11/06/2019.
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.
For details of Network areas please see the Cadent website (http://cadentgas.com/Digging-safely/Dial-before-you-dig) or the enclosed documentation.

Are My Works Affected?

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.
Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.
If the application is refused for any other reason than the presence of apparatus, we will not take any further action.
Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

As your proposed activity is in close proximity to National Grid's Transmission assets we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at assetprotection@nationalgrid.com if you have not had a response within this time frame.

Cadent is a trading name for: Cadent Gas Limited
Registered Office: Ashbrook Court, Prologis Park, Central Boulevard, Coventry CV7 8PE
Registered in England and Wales, No 10080864

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- Gas service pipes and related apparatus
- Recently installed apparatus
- Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the National Grid or Cadent website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail (click here) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus
The apparatus that has been identified as being in the vicinity of your proposed works is:

- Electricity Transmission underground cables and associated equipment
- Electricity Transmission overhead lines
- Above ground electricity sites and installations

As your proposal is in proximity to apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- Land and Development Asset Protection Team (High Pressure Gas Transmission and Electricity Transmission Apparatus)

We request that you take no further action with regards to your proposal until you hear from the above. We will contact you within 28 working days from the date of this response. Please contact us if you have not had a response within this timeframe.

Requirements

BEFORE carrying out any work you must:

- **Refer to the attached cable profile drawings (if any) which provide details about the location of National Grid's high voltage underground cables.**
- Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at http://www.hse.gov.uk
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

Working Near National Grid Electricity Transmission equipment:
If you are carrying out any work in proximity to an overhead line or any excavation that may be near an underground cable then please consult National Grid Technical Guidance Note 287 that can be found at https://www.nationalgrid.com/sites/default/files/documents/8589935533-TGN%20287_Third%20party%20guidance%20for%20working%20near%20NGET%20equipment.pdf Further guidance related to underground cables can also be found at https://www.nationalgrid.com/sites/default/files/documents/8589936512-Excavating%20Safety%20Leaflet%20Electricity.pdf

Standard Guidance

Essential Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982

General Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103

Excavating Safely in the vicinity of gas pipes guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf

Excavating Safely in the vicinity of electricity cables guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf

Copies of all the Guidance Documents can also be downloaded from the National Grid and Cadent websites.

TM4565SE
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4665SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4665SE
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4765SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4865SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4564NE
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4664NW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4664NE
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4764NW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4864NW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4864SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4863NW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4863SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4862NW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4862SW
Tile not found in current owner index. Other owners' assets may be present in this area.

TM4861NW
Tile not found in current owner index. Other owners' assets may be present in this area.

Not to be used for construction

ID: EA_GE4B_3NWP_018270

USER: Bethany.Kennard

DATE: 19/06/2019

DATA DATE: 18/06/2019

REF: EN010012-000670 ESRI- PART

MAP REF: TM4763
CENTRE: 647032, 263379

View extent: 2890m, 3670m

LP MAINS
MP MAINS
IP MAINS
LHP MAINS
NHP MAINS

0m — 200m
Approximate scale 1:10000
on A3 Colour Portrait

Some examples of Plant Items:

Valve | Depth of Cover | Syphon | Diameter Change | Material Change | Out of Standard Service

Do not proceed without further consultation

This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

Map 2 of 2 (GAS)

MAPS Plot Server Version 1.11.0

Cadent
Your Gas Network

Requested by: Planning Inspectorate

This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886

TM4585SE
Tile not found in current owner index. Other owners' assets may be present in this area.
TM4665SW
Tile not found in current owner index. Other owners' assets may be present in this area.
TM4685SE
Tile not found in current owner index. Other owners' assets may be present in this area.
TM4785SW
Tile not found in current owner index. Other owners' assets may be present in this area.
TM4785SE
Tile not found in current owner index. Other owners' assets may be present in this area.
TM4865SW
Tile not found in current owner index. Other owners' assets may be present in this area.
Not to be used for construction

Dunwich Forest
Goose Hill
Hilltop Covert
Turf Pits
Nursery Covert
Drains
Kenton Hills
Grimseys
Leiston Carr
Sizewell Belts
Reckham Pits Wood
Keepers Cottage
Leiston Common
Sandy Lane (Track)
Round Covert
Reckham Lodge
The Studio
Rookyard Wood
Coronation Wood
Broom Covert
Rosery Cottages
Power Station
Hill Wood
Off-shore Tower
Car Parks
Sizewell
CG Lookout
PH
Coastguard Cottages
Cycle Track
SIZEWELL GAP
Crown Lodge
Crown Farm
Halfway Cottages
Grimsey's Lane (Track)
Home Farm
Cliff House
Caravan Site
Sizewell Common
Pebble Cottages
White Cottages
Ivy Cottages
Sizewell Hall
Sizewell Cliff
Crown Land Cottage
Reservoir
Pit (disused)
Forty Acre Belt
Dismantled Railway
Dower House
The Walks
Stonewall Belt
Track
Drain
Path
Sand
Mean High Water
Mean Low Water
12m
17m
CP

ID: EA_GE4B_3NWP_018270	View extent: 2890m, 3670m	Do not proceed without further consultation	Map 1 of 2 (ELECTRIC)
USER: Bethany.Kennard	Underground cables Overhead lines	This plan shows those cables owned by National Grid Electricity Transmission plc in its role as a Licensed Electricity Transporter (ET). Electricity cables owned by other ETs, or otherwise privately owned, may be present in this area. Information with regard to such cables should be obtained from the relevant owners The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Ancillary equipment such as cooling systems and communication cables are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Grid Electricity Transmission plc or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of cables and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near electricity apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.	MAPS Plot Server Version 1.11.0
DATE: 19/06/2019			nationalgrid
DATA DATE: 18/02/2019			Requested by: Planning Inspectorate
REF: EN010012-000670 ESRI- PART			This plan is reproduced from or based on the OS map by National Grid Electricity Transmission plc, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024241
MAP REF: TM4763 CENTRE: 647032, 263379	0m 200m Approximate scale 1:10000 on A3 Colour Portrait		

ENQUIRY SUMMARY

Received Date
11/06/2019

Your Reference
EN010012-000670 ESRI- PART ONE

Location
Centre Point: 647032, 263379
X Extent: 600
Y Extent: 1030
Postcode: IP16 4UJ
Location Description: Sandy Lane, Leiston Common, Leiston

Map Options
Paper Size: A3
Orientation: PORTRAIT
Requested Scale: 10000
Actual Scale: 1:10000 (ELECTRIC), 1:10000 (GAS)
Real World Extents: 2890m x 3670m (ELECTRIC), 2890m x 3670m (GAS)

Recipients
pprsteam@cadentgas.com

Enquirer Details
Organisation Name: Planning Inspectorate
Contact Name: Gail Boyle
Email Address: sizewellc@planninginspectorate.gov.uk
Telephone: 0303 444 5068
Address: The Planning Inspectorate, Room 3C, Temple Quay House, 2 The Square, Bristol, BS1 6PN

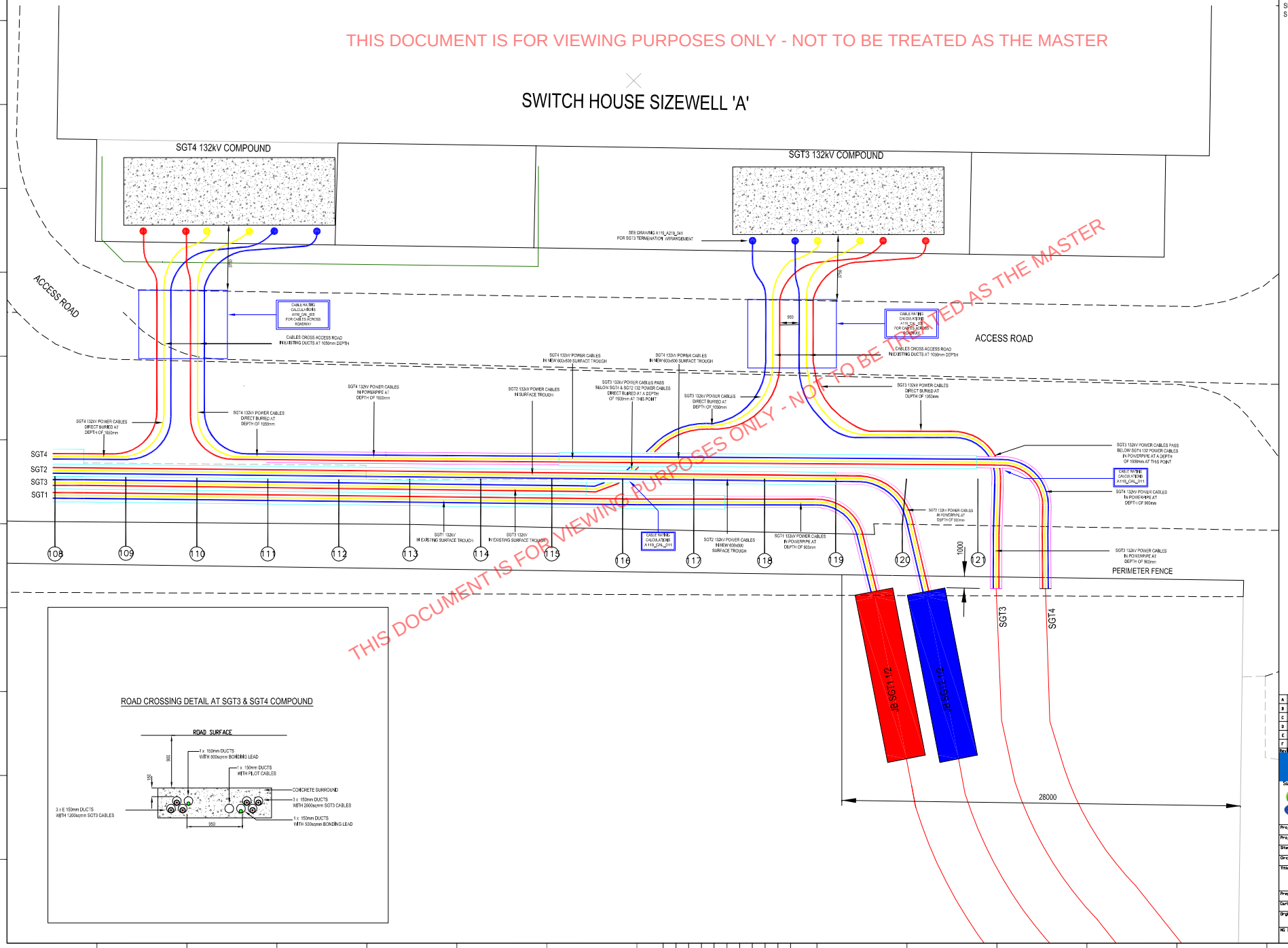
Description of Works
Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation

Enquiry Type
Formal Planning Application

Development Types
Development Type: Other

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

SWITCH HOUSE SIZEWELL 'A'



ROAD CROSSING DETAIL AT SGT3 & SGT4 COMPOUND

NOTES

CROSS SECTIONS FACING LEISTON

SEE DRAWING A119_A219_001 FOR SIZEWELL 'A' TO LEISTON CABLE ROUTE

SEE DRAWING A119_A219_004 FOR SIZEWELL 'B' TO SIZEWELL 'A' CABLE ROUTE

AS BUILT DRAWING

132kV POWER CABLES

132kV POWER CABLES IN POWERPIPE

132kV POWER CABLES IN SURFACE TROUGHS

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_055

A		MAS	MN	AB 03/04/09
B	CABLE RATING CALCULATIONS DETAILS ADDED NOTES UPDATED	MAS	MN	AB 20/07/09
C	AS BUILT	MAS	MN	AB 27/07/09
D	AS BUILT SGT4 INSTALLED	MAS	DK	MN 31/08/10
E	AS BUILT SGT2 INSTALLED	MAS	DK	MN 31/03/11
F	NATIONAL GRID UPDATE TP125 COMPLIANT	CMB25	CAM/STD/0720	25/10/11
Rev	Revision	Drawn	Chkd	Appd Date

Electricity Alliance

Subcontractor

carillion

EAL PROJECT SERVICES LOWRY HOUSE 103 WALLDEN ROAD WEST CHORLTON-CUM-HARDY MANCHESTER M21 7AA TELEPHONE 0161 860 2000

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	CABLE ROUTE DETAILS AT SIZEWELL 'A'

Prepared	Checked	Approved	Date Approved
MAS	DK	MN	11/03/11

Carillion Drawing No A119_A219_054

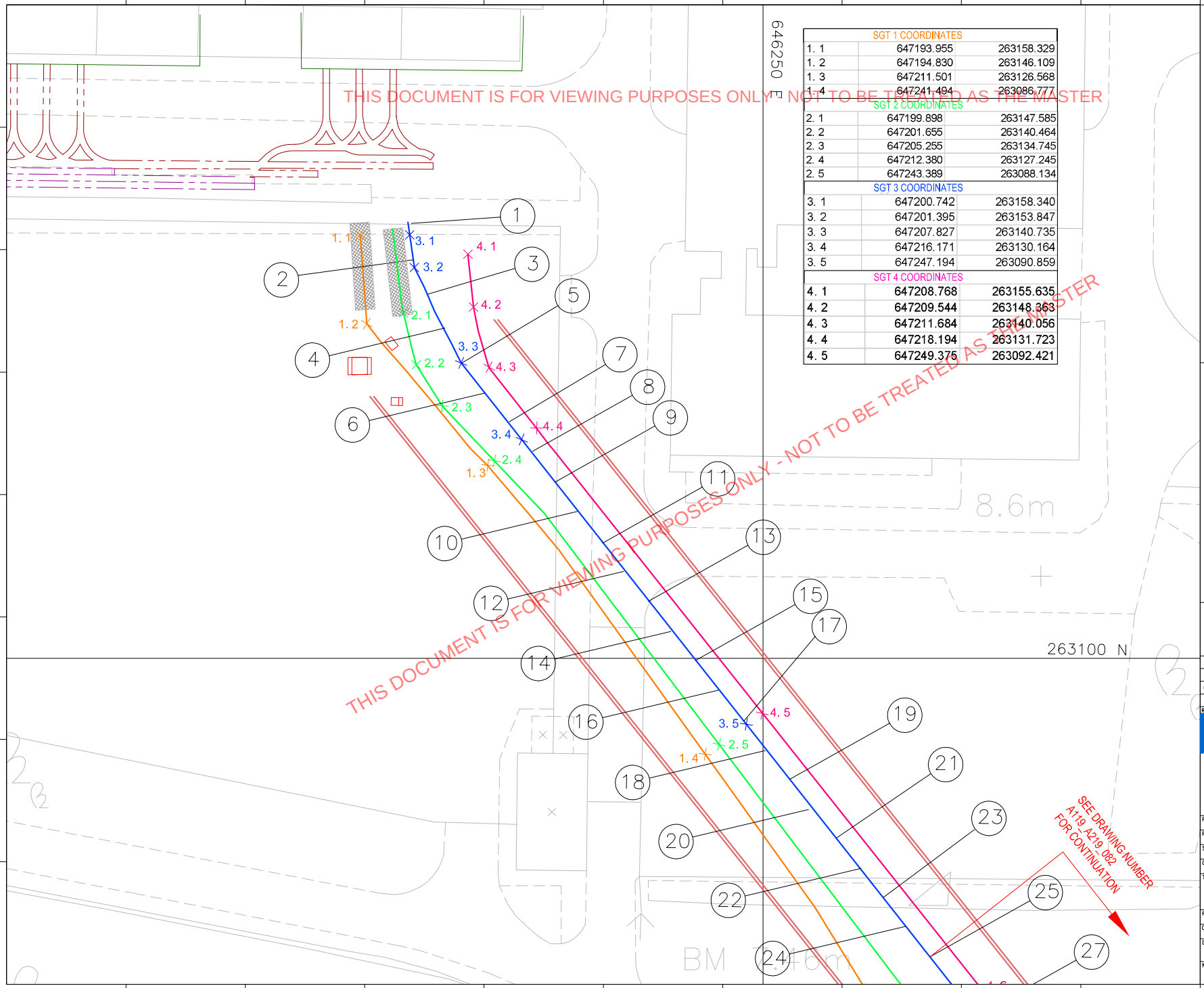
Originators Drawing No

Scale NTS | Format A0

NG Drawing No 70_SEA_0077 | Sheet | Cont | Rev F

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER



SGT 1 COORDINATES		
1. 1	647193.955	263158.329
1. 2	647194.830	263146.109
1. 3	647211.501	263126.568
1. 4	647241.494	263086.777
SGT 2 COORDINATES		
2. 1	647199.898	263147.585
2. 2	647201.655	263140.464
2. 3	647205.255	263134.745
2. 4	647212.380	263127.245
2. 5	647243.389	263088.134
SGT 3 COORDINATES		
3. 1	647200.742	263158.340
3. 2	647201.395	263153.847
3. 3	647207.827	263140.735
3. 4	647216.171	263130.164
3. 5	647247.194	263090.859
SGT 4 COORDINATES		
4. 1	647208.768	263155.635
4. 2	647209.544	263148.363
4. 3	647211.684	263140.056
4. 4	647218.194	263131.723
4. 5	647249.375	263092.421

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	JOINT BAY ADDED	MAS	MN	DK	16/02/11
C	JOINT BAY ADDED	MAS	MN	DK	16/02/11
D	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAW457	IH722	27/10/11

Electricity Alliance

Subcontractor

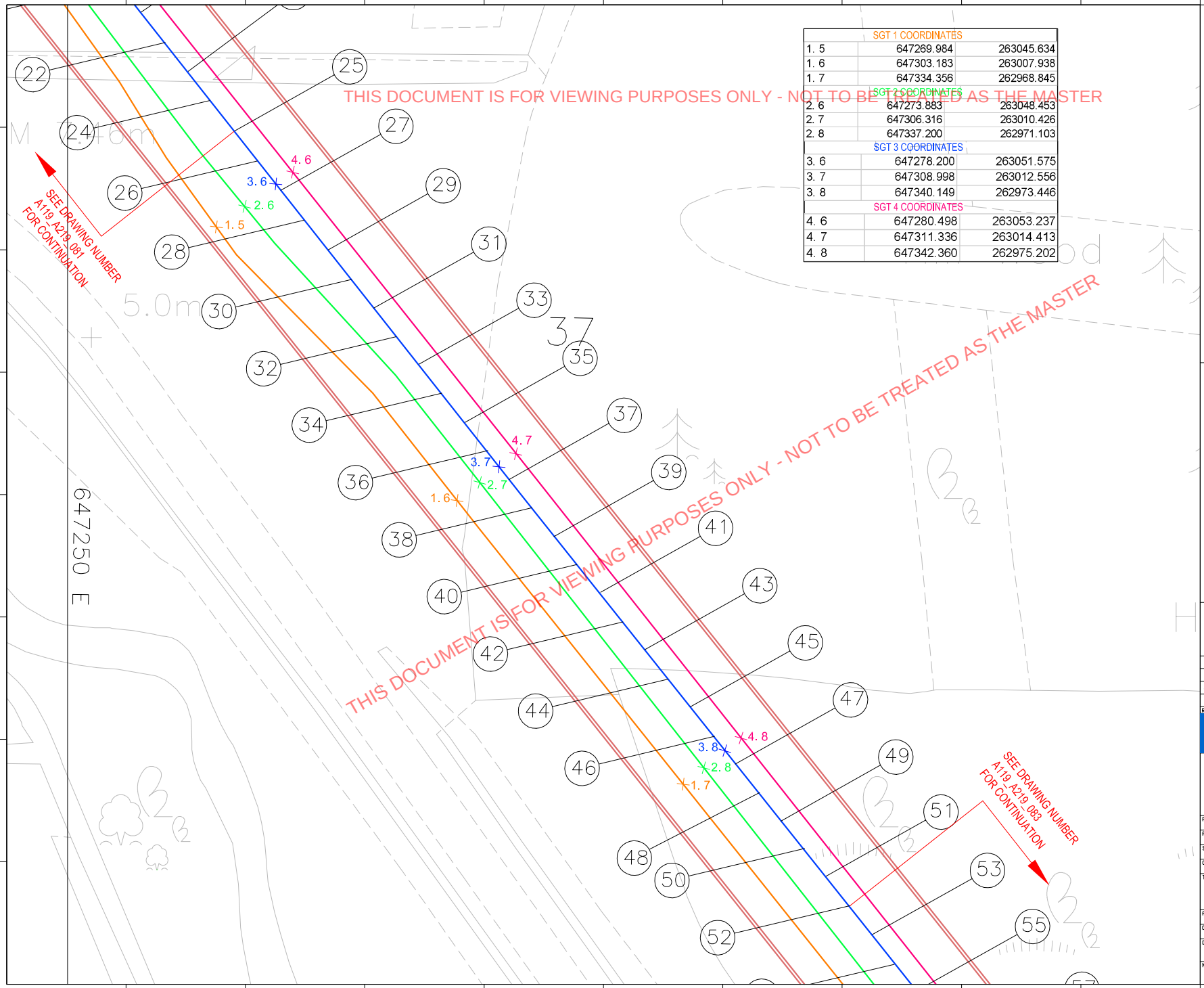
carillion

EHV PROJECT SERVICES

The Matthews
Lomeon Road
Trafford Park
Manchester
M17 1BA
Telephone 0161 886 6000
Facsimile 0161 886 6004

Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 1/8
Prepared	MAS
Checked	MN
Approved	DK
Date Approved	16/02/11
Carillion Drawing No	A119_A219_081
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0080
Sheet	
Cont	
Rev	D

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

SGT 1 COORDINATES		
1. 5	647269.984	263045.634
1. 6	647303.183	263007.938
1. 7	647334.356	262968.845
SGT 2 COORDINATES		
2. 6	647273.883	263048.453
2. 7	647306.316	263010.426
2. 8	647337.200	262971.103
SGT 3 COORDINATES		
3. 6	647278.200	263051.575
3. 7	647308.998	263012.556
3. 8	647340.149	262973.446
SGT 4 COORDINATES		
4. 6	647280.498	263053.237
4. 7	647311.336	263014.413
4. 8	647342.360	262975.202

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT
- (X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	27/10/11

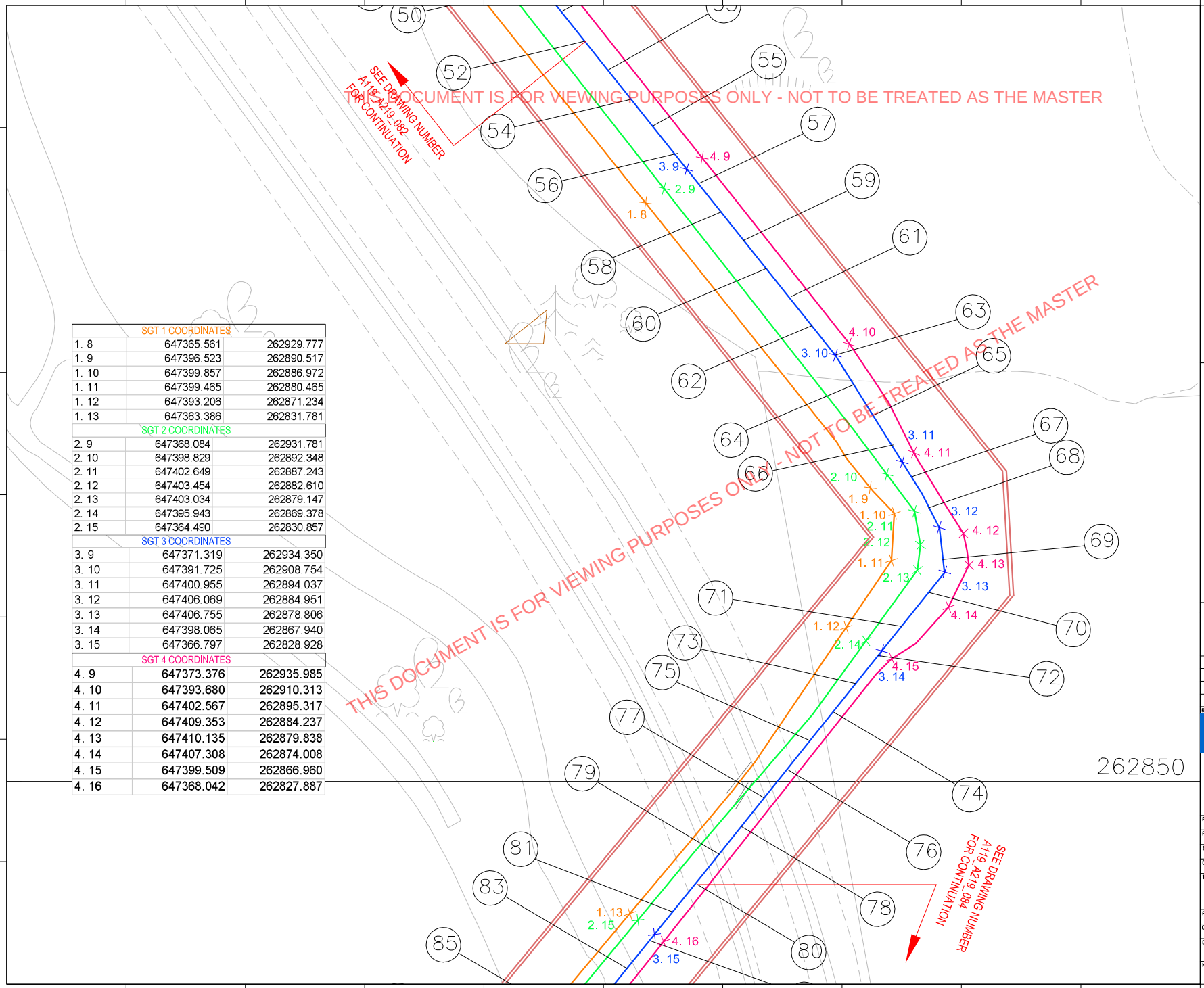
Electricity Alliance

Subcontractor: carillion

EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 2/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_082
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0081
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

SGT 1 COORDINATES		
1. 8	647365.561	262929.777
1. 9	647396.523	262890.517
1. 10	647399.857	262886.972
1. 11	647399.465	262880.465
1. 12	647393.206	262871.234
1. 13	647363.386	262831.781
SGT 2 COORDINATES		
2. 9	647368.084	262931.781
2. 10	647398.829	262892.348
2. 11	647402.649	262887.243
2. 12	647403.454	262882.610
2. 13	647403.034	262879.147
2. 14	647395.943	262869.378
2. 15	647364.490	262830.857
SGT 3 COORDINATES		
3. 9	647371.319	262934.350
3. 10	647391.725	262908.754
3. 11	647400.955	262894.037
3. 12	647406.069	262884.951
3. 13	647406.755	262878.806
3. 14	647398.065	262867.940
3. 15	647366.797	262828.928
SGT 4 COORDINATES		
4. 9	647373.376	262935.985
4. 10	647393.680	262910.313
4. 11	647402.567	262895.317
4. 12	647409.353	262884.237
4. 13	647410.135	262879.838
4. 14	647407.308	262874.008
4. 15	647399.509	262866.960
4. 16	647368.042	262827.887

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	27/10/11

Electricity Alliance

Subcontractor

carillion

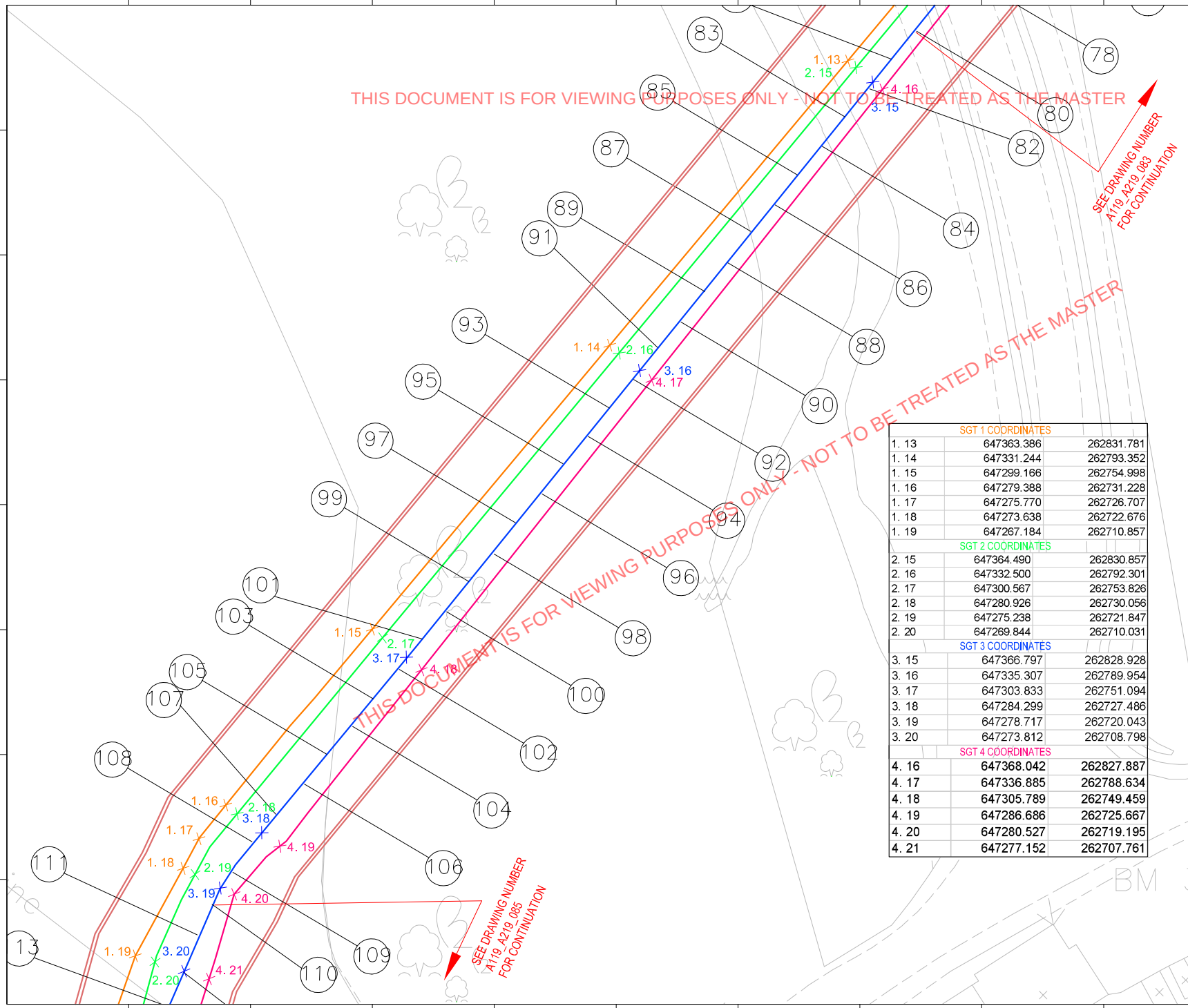
EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 3/8

Prepared	Checked	Approved	Date Approved
MAS	MN	AB	08/12/09

Carillion Drawing No	A119_A219_083		
Originators Drawing No		Scale 1:250	Format A1
NG Drawing No	70_SEA_0082	Sheet	Cont / Rev B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



SGT 1 COORDINATES		
1. 13	647363.386	262831.781
1. 14	647331.244	262793.352
1. 15	647299.166	262754.998
1. 16	647279.388	262731.228
1. 17	647275.770	262726.707
1. 18	647273.638	262722.676
1. 19	647267.184	262710.857
SGT 2 COORDINATES		
2. 15	647364.490	262830.857
2. 16	647332.500	262792.301
2. 17	647300.567	262753.826
2. 18	647280.926	262730.056
2. 19	647275.238	262721.847
2. 20	647269.844	262710.031
SGT 3 COORDINATES		
3. 15	647366.797	262828.928
3. 16	647335.307	262789.954
3. 17	647303.833	262751.094
3. 18	647284.299	262727.486
3. 19	647278.717	262720.043
3. 20	647273.812	262708.798
SGT 4 COORDINATES		
4. 16	647368.042	262827.887
4. 17	647336.885	262788.634
4. 18	647305.789	262749.459
4. 19	647286.686	262725.667
4. 20	647280.527	262719.195
4. 21	647277.152	262707.761

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAW457	IH722	27/10/11

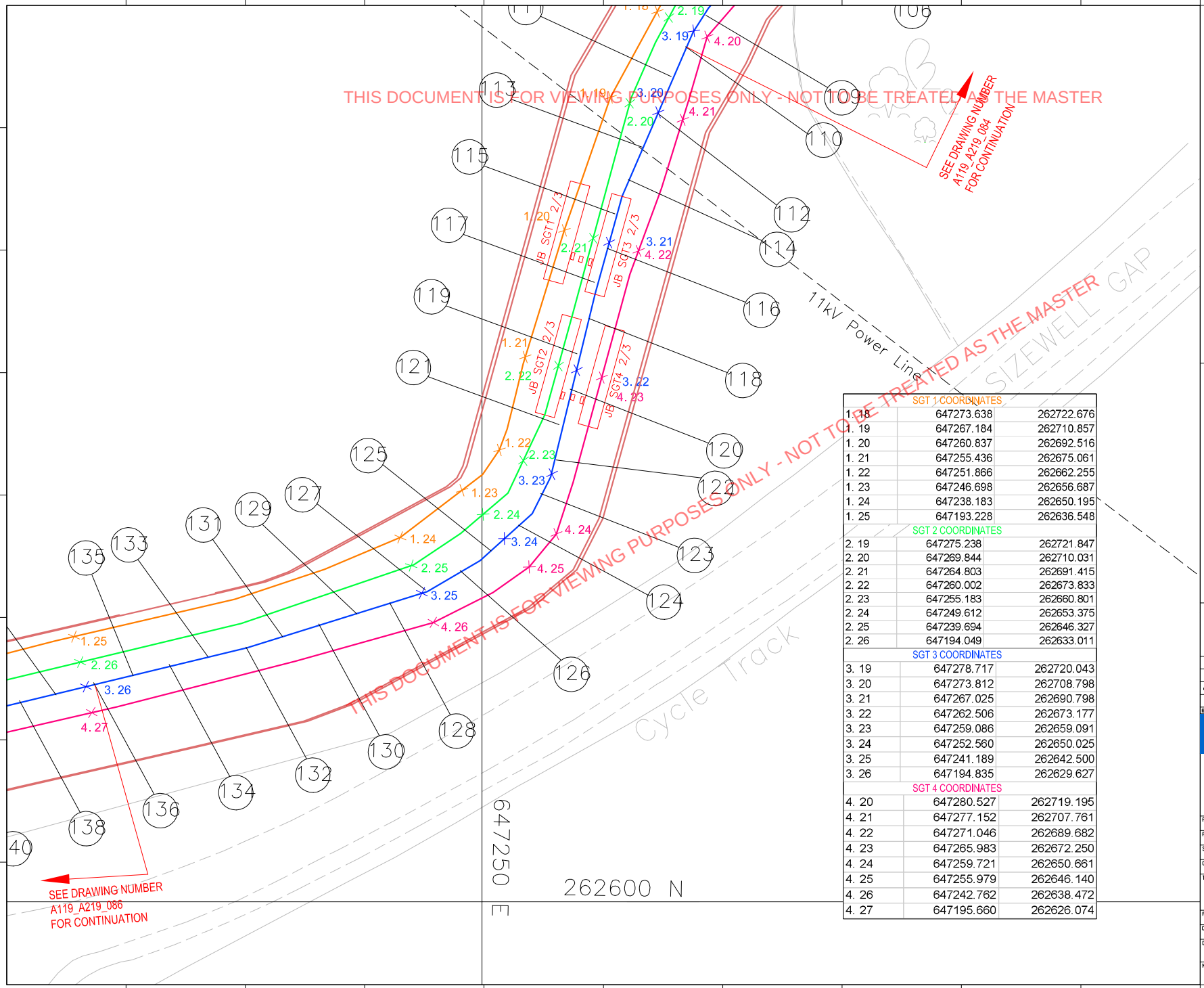
Electricity Alliance

Subcontractor: carillion

EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 4/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_084
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0083
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



SGT 1 COORDINATES		
1. 18	647273.638	262722.676
1. 19	647267.184	262710.857
1. 20	647260.837	262692.516
1. 21	647255.436	262675.061
1. 22	647251.866	262662.255
1. 23	647246.698	262656.687
1. 24	647238.183	262650.195
1. 25	647193.228	262636.548
SGT 2 COORDINATES		
2. 19	647275.238	262721.847
2. 20	647269.844	262710.031
2. 21	647264.803	262691.415
2. 22	647260.002	262673.833
2. 23	647255.183	262660.801
2. 24	647249.612	262653.375
2. 25	647239.694	262646.327
2. 26	647194.049	262633.011
SGT 3 COORDINATES		
3. 19	647278.717	262720.043
3. 20	647273.812	262708.798
3. 21	647267.025	262690.798
3. 22	647262.506	262673.177
3. 23	647259.086	262659.091
3. 24	647252.560	262650.025
3. 25	647241.189	262642.500
3. 26	647194.835	262629.627
SGT 4 COORDINATES		
4. 20	647280.527	262719.195
4. 21	647277.152	262707.761
4. 22	647271.046	262689.682
4. 23	647265.983	262672.250
4. 24	647259.721	262650.661
4. 25	647255.979	262646.140
4. 26	647242.762	262638.472
4. 27	647195.660	262626.074

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT
- (X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	DH722	27/10/11

Electricity Alliance

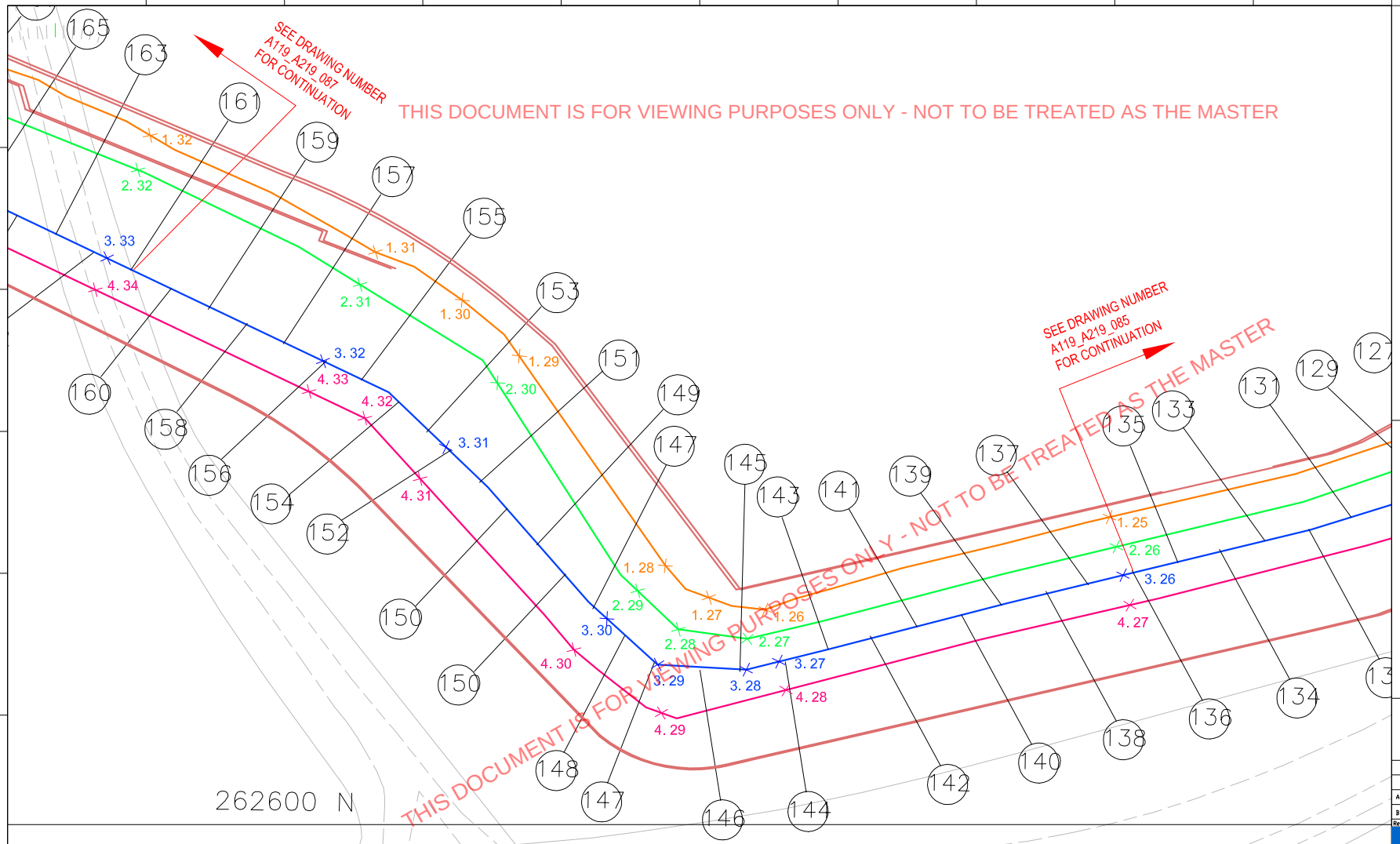
Subcontractor

carillion

EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 5/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_085
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0084
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

SGT 1 COORDINATES		
1. 25	647193.228	262636.548
1. 26	647152.289	262625.542
1. 27	647145.603	262626.998
1. 28	647140.435	262630.801
1. 29	647123.090	262655.685
1. 30	647116.309	262662.355
1. 31	647105.977	262668.058
1. 32	647079.212	262681.933

SGT 2 COORDINATES		
2. 26	647194.049	262633.011
2. 27	647150.200	262622.093
2. 28	647141.983	262623.208
2. 29	647137.158	262627.780
2. 30	647120.491	262652.467
2. 31	647104.137	262664.193
2. 32	647077.747	262677.814

SGT 3 COORDINATES		
3. 26	647194.835	262629.627
3. 27	647153.893	262619.358
3. 28	647139.508	262618.998
3. 29	647150.090	262618.416
3. 30	647133.535	262624.440
3. 31	647114.363	262644.882
3. 32	647099.797	262655.076
3. 33	647074.048	262667.334

SGT 4 COORDINATES		
4. 27	647195.660	262626.074
4. 28	647154.769	262615.982
4. 29	647139.968	262613.269
4. 30	647129.568	262620.783
4. 31	647111.307	262641.100
4. 32	647104.737	262648.294
4. 33	647098.077	262651.465
4. 34	647072.675	262663.558

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	DAV457	DH722	27/10/11

Electricity Alliance

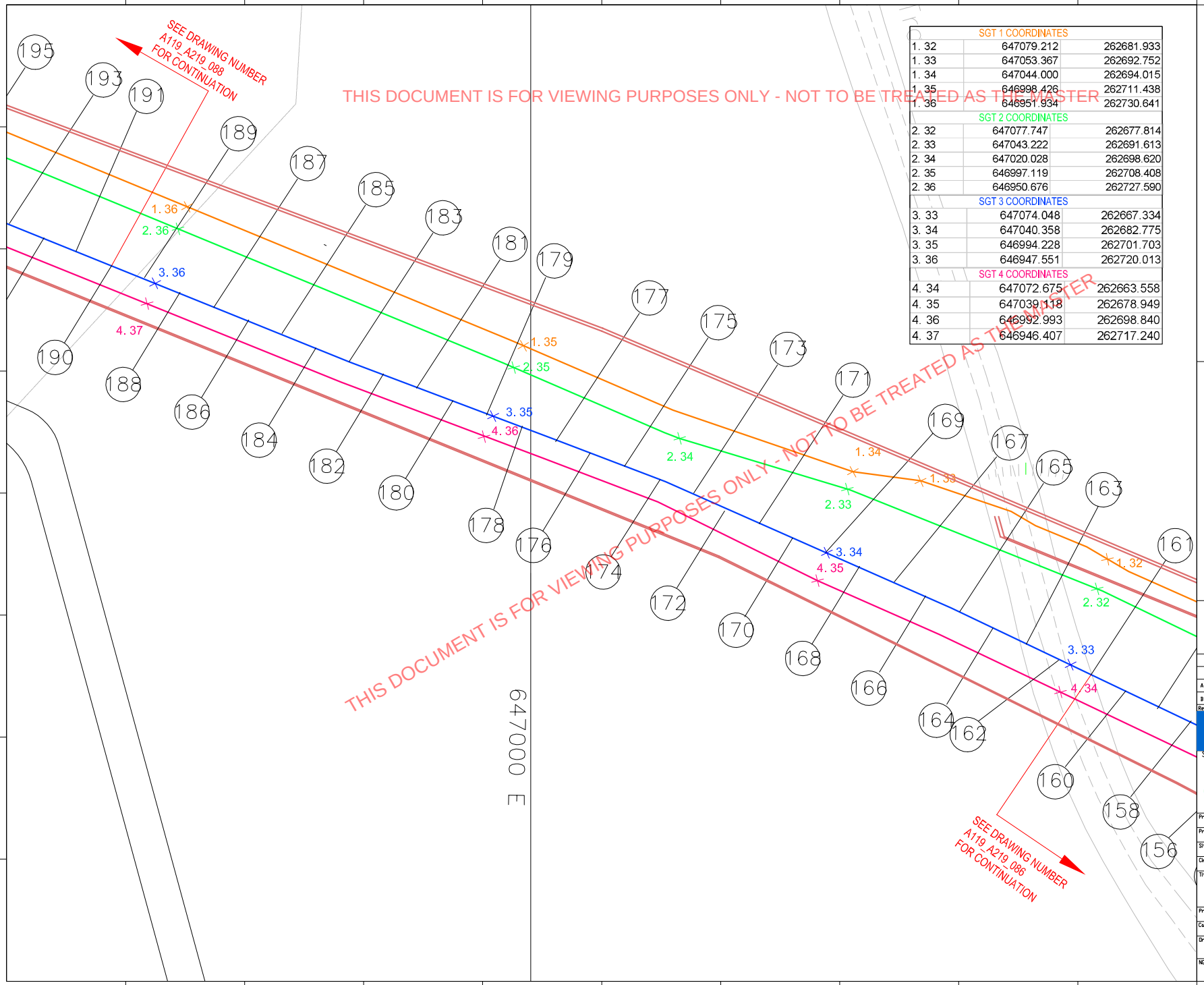
Subcontractor

carillion

EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 6/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_086
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0085
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

SGT 1 COORDINATES		
1. 32	647079.212	262681.933
1. 33	647053.367	262692.752
1. 34	647044.000	262694.015
1. 35	646998.426	262711.438
1. 36	646951.934	262730.641
SGT 2 COORDINATES		
2. 32	647077.747	262677.814
2. 33	647043.222	262691.613
2. 34	647020.028	262698.620
2. 35	646997.119	262708.408
2. 36	646950.676	262727.590
SGT 3 COORDINATES		
3. 33	647074.048	262667.334
3. 34	647040.358	262682.775
3. 35	646994.228	262701.703
3. 36	646947.551	262720.013
SGT 4 COORDINATES		
4. 34	647072.675	262663.558
4. 35	647039.118	262678.949
4. 36	646992.993	262698.840
4. 37	646946.407	262717.240

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	27/10/11

Electricity Alliance

Subcontractor

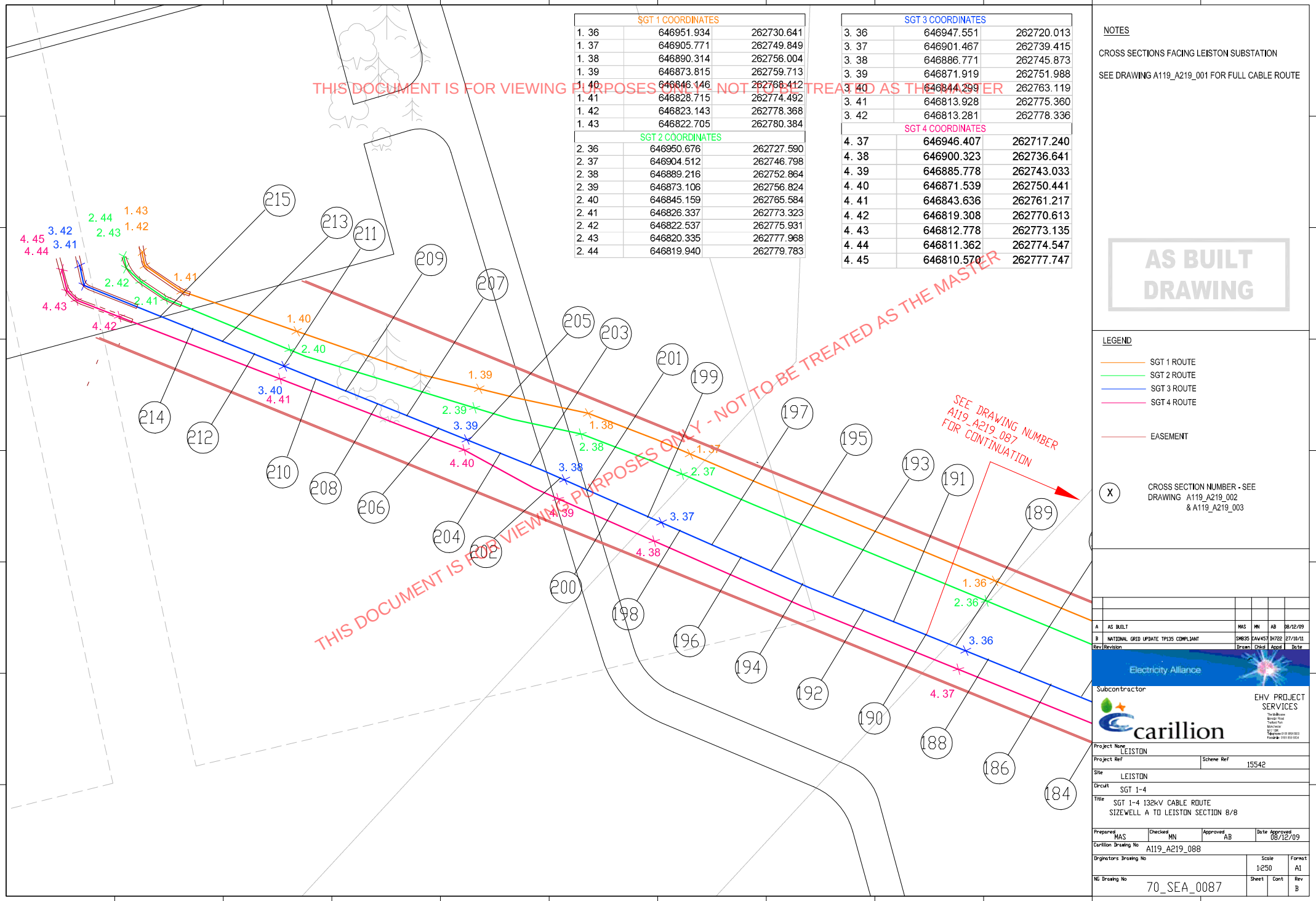
carillion

EHV PROJECT SERVICES

The Wellhouse, Dinnan Road, Trafford Park, Manchester M17 1BA. Telephone 0161 886 6000 Facsimile 0161 886 6004

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 7/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_087
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0086
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.



SGT 1 COORDINATES		
1. 36	646951.934	262730.641
1. 37	646905.771	262749.849
1. 38	646890.314	262756.004
1. 39	646873.815	262759.713
1. 40	646846.146	262768.412
1. 41	646828.715	262774.492
1. 42	646823.143	262778.368
1. 43	646822.705	262780.384
SGT 2 COORDINATES		
2. 36	646950.676	262727.590
2. 37	646904.512	262746.798
2. 38	646889.216	262752.864
2. 39	646873.106	262756.824
2. 40	646845.159	262765.584
2. 41	646826.337	262773.323
2. 42	646822.537	262775.931
2. 43	646820.335	262777.968
2. 44	646819.940	262779.783

SGT 3 COORDINATES		
3. 36	646947.551	262720.013
3. 37	646901.467	262739.415
3. 38	646886.771	262745.873
3. 39	646871.919	262751.988
3. 40	646844.299	262763.119
3. 41	646813.928	262775.360
3. 42	646813.281	262778.336
SGT 4 COORDINATES		
4. 37	646946.407	262717.240
4. 38	646900.323	262736.641
4. 39	646885.778	262743.033
4. 40	646871.539	262750.441
4. 41	646843.636	262761.217
4. 42	646819.308	262770.613
4. 43	646812.778	262773.135
4. 44	646811.362	262774.547
4. 45	646810.570	262777.747

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

SEE DRAWING A119_A219_001 FOR FULL CABLE ROUTE

AS BUILT DRAWING

LEGEND

- SGT 1 ROUTE
- SGT 2 ROUTE
- SGT 3 ROUTE
- SGT 4 ROUTE
- EASEMENT

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_002 & A119_A219_003

SEE DRAWING NUMBER A119_A219_087 FOR CONTINUATION

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

Rev	Revision	Drawn	Chkd	Appd	Date
A	AS BUILT	MAS	MN	AB	08/12/09
B	NATIONAL GRID UPDATE TP135 COMPLIANT	SMB35	CAV457	IH722	27/10/11

Electricity Alliance

Subcontractor

carillion

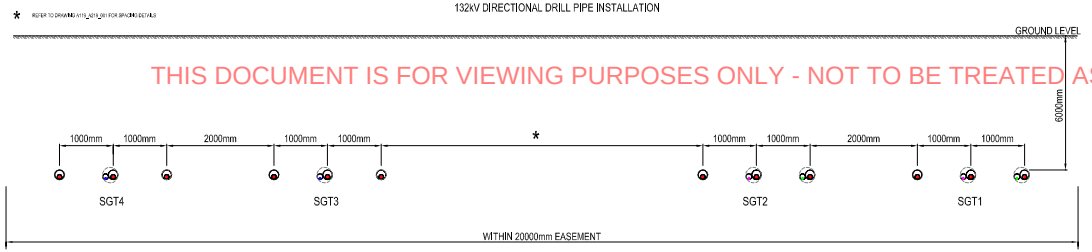
EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL A TO LEISTON SECTION 8/8
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	08/12/09
Carillion Drawing No	A119_A219_088
Originators Drawing No	
Scale	1:250
Format	A1
NG Drawing No	70_SEA_0087
Sheet	
Cont	
Rev	B

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

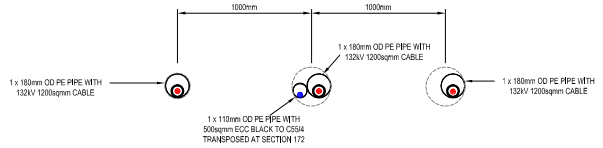
(158) TO (167)

132kV DIRECTIONAL DRILL PIPE INSTALLATION

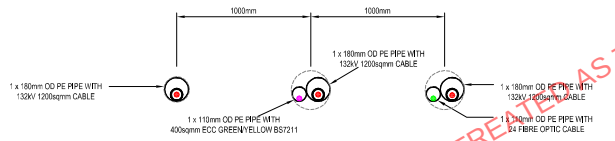


SANDY LANE HORIZONTAL DIRECTIONAL DRILL LAYOUT (1:50)

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER



SGT3 & SGT4 CIRCUIT SECTION (1:20)



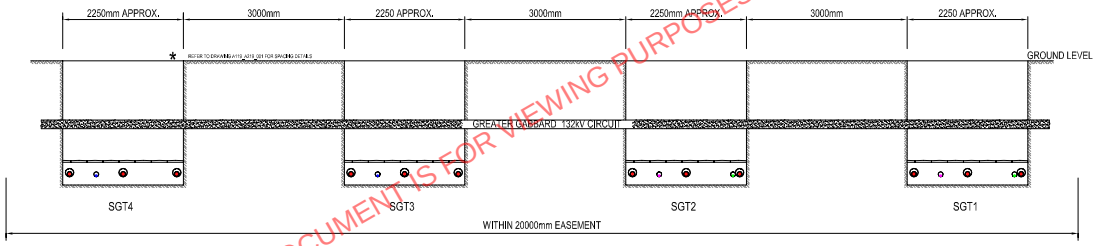
SGT1 & SGT2 CIRCUIT SECTION (1:20)

ALL DUCTS INCLUDING THOSE FOR EARTHING CABLES AND FIBRE OPTICS ARE BENTONITE FILLED IN DIRECTIONAL DRILL SECTIONS

AS BUILT DRAWING

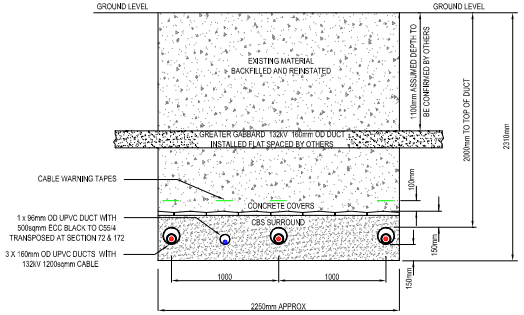
(186) TO (190)

132kV OPEN CUT DUCTED INSTALLATION

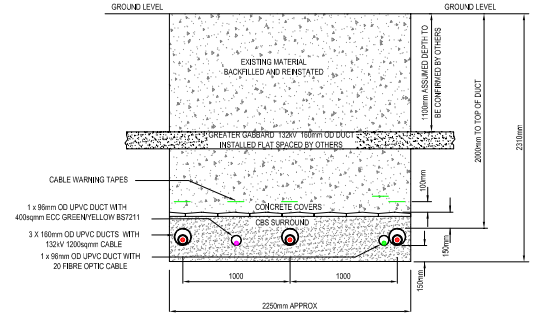


TRENCH SPACING (1:50)

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER



SGT3 & SGT4 CIRCUIT DUG TRENCH SECTION (1:25)



SGT1 & SGT2 CIRCUIT DUG TRENCH SECTION (1:25)

THE SET CIRCUIT PHASES ARE SPACED TO MAINTAIN 240 MVA LOADING BASED UPON THE GREATER GABBARD CIRCUIT EITHER FLAT FORMATION OR IN TREFOIL BEING LOADED TO MAXIMUM 90 DEGREES CELSIUS CONDUCTOR TEMPERATURES

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

POWER CABLES OF XLPE CONSTRUCTION RATED AT 132KV, 275KV AND 400KV IN ACCORDANCE WITH NGTS 3.5.2

INSTALLATION REQUIREMENTS FOR POWER AUXILIARY CABLES IN ACCORDANCE WITH NGTS 3.5.7

CONCRETE PROTECTION COVERS IN COMPLIANCE WITH BS2484 AND INSTALLED IN LINE WITH NGTS 3.5.7

ALL POWER CABLES PROTECTED FROM EXTERNAL DAMAGE BY PROTECTION COVERS MANUFACTURED FROM REINFORCED CONCRETE.

WHERE A STABILISED BACKFILL USED THE COMPLETE WIDTH OF THE BACKFILLED AREA SHALL BE COVERED BY PROTECTION COVERS.

THE WIDTH OF THE CABLE PROTECTION COVERS LAID SO THAT THERE IS 50mm OVERLAP ON EACH SIDE OF THE CABLE OR OUTSIDE CABLE OF A GROUP OF CABLES.

IF MORE THAN ONE COVER IS USED ACROSS THE WIDTH OF THE CABLES THE JOINT BETWEEN COVERS LIE ABOVE THE SPACE BETWEEN THE CABLES AND NOT OVER THE CABLES.

IDENTIFICATION WARNING TAPES LAID 100mm ABOVE THE CONCRETE CABLE PROTECTION COVERS.

SPECIAL BACKFILL MATERIAL 'STABILISED COMPRISING CEMENT BOUND SAND (CBS) HAVING A THERMAL RESISTIVITY IN FULLY DRIED OUT STATE NOT EXCEEDING 1.2 DEGREES C m/W AND MADE UP OF 14 PARTS 'SELECTED SAND' BY VOLUME AND ONE PART PORTLAND CEMENT TO BS12 BY VOLUME.

SPECIAL BACKFILL MATERIALS INSTALLED AND TESTED IN ACCORDANCE WITH NGTS SPECIFICATIONS.

BACKFILL FOR POWER CABLES SDOES NOT CONTAIN MATERIAL THAT COULD DAMAGE THE OVERSHEATH.

A MINIMUM BACKFILL THICKNESS OF 75mm PROVIDED ABOVE, BELOW AND ALONGSIDE THE CABLE EXTENDING THE FULL WIDTH OF THE TRENCH AND UP TO THE PROTECTIVE COVER.

LEGEND

- 1200sqmm Cu 132kV CABLE TO IEC 60840
- 2000sqmm Cu 132kV CABLE TO IEC 60840
- 500sqmm ECC BLACK TO C5514
- 400sqmm ECC GREEN/YELLOW BS7211 CABLE IS FOR SUBSTATION EARTHING ONLY AND DOES NOT FORM PART OF CABLE DESIGN SYSTEM
- 20 FIBRE OPTIC CABLE
- (X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_001 FOR LOCATION

Rev	Revision	Drawn	Chkd	Appd	Date
A		MAS	MN	AB	08/12/08
B	400sqmm ECC ADDED	MAS	MN	AB	06/01/09
C	WARNING TAPE ADDED	MAS	MN	AB	27/01/09
D	ADDITIONAL NOTES ADDED TO THE DRAWING	MAS	MN	AB	12/03/09
E	AS BUILT	MAS	MN	AB	09/12/09
F	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	24/10/11

Electricity Alliance

Subcontractor

carillion

EHV PROJECT SERVICES

The Melbourne Bennett Road Trafford Park Manchester M17 1SS Telephone: 0161 869 6900 Facsimile: 0161 869 6904

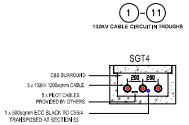
Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	132kV CABLE ROUTE CROSS SECTIONS SIZEWELL A TO LEISTON

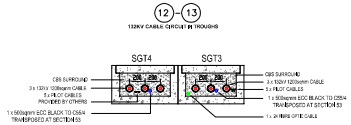
Prepared	Checked	Approved	Date Approved
MAS	MN	AB	09/12/09

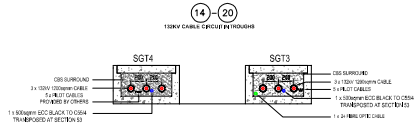
Carillion Drawing No	A119_A219_003		
Originators Drawing No		Scale: AS SHOWN	Format: A1
NG Drawing No	70_SEA_0070	Sheet	Cont / Rev: F

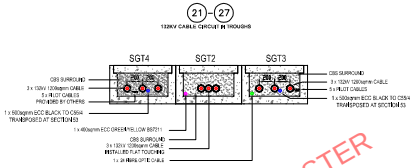
We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

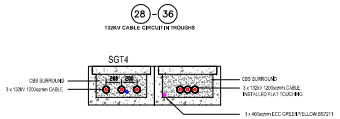
THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

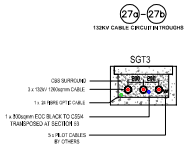


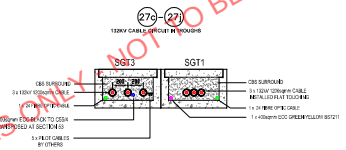


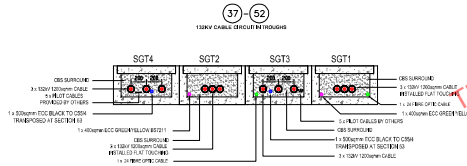


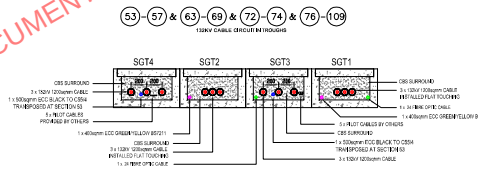


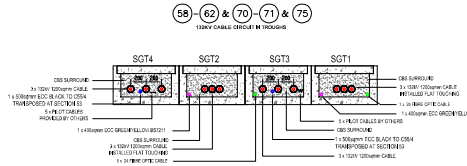












NOTES

CROSS SECTIONS FACING SIZEWELL A

POWER CABLES OF XLPE CONSTRUCTION RATED AT 132KV, 275KV AND 400KV IN ACCORDANCE WITH NGTS 3.5.2

INSTALLATION REQUIREMENTS FOR POWER AUXILIARY CABLES IN ACCORDANCE WITH NGTS 3.5.7

SPECIAL BACKFILL MATERIAL 'STABLISED' COMPRISING CEMENT BOUND SAND (CBS) HAVING A THERMAL RESISTIVITY IN FULLY DRIED OUT STATE NOT EXCEEDING 1.2 DEGREES C m/W AND MADE UP OF 14 PARTS 'SELECTED SAND' BY VOLUME AND ONE PART PORTLAND CEMENT TO BS12 BY VOLUME.

SPECIAL BACKFILL MATERIALS SHALL BE INSTALLED AND TESTED IN ACCORDANCE WITH NGTS SPECIFICATIONS.

PRIOR TO BACKFILLING, NATIONAL GRID GIVEN THE OPPORTUNITY TO INSPECT THE INSTALLATION OF CABLE AND ACCESSORIES.

AS BUILT DRAWING

LEGEND

- 1200sqmm Cu 132kV CABLE TO IEC 60840
- 2000sqmm Cu 132kV CABLE TO IEC 60840
- 500sqmm ECC BLACK TO CS54
- 400sqmm ECC GREEN/YELLOW BS7211 CABLE IS FOR SUBSTATION EARTHING ONLY AND DOES NOT FORM PART OF CABLE DESIGN SYSTEM
- 24 FIBRE OPTIC CABLE
- (X) CROSS SECTION NUMBER - SEEDRAWING A119_A219_004 FOR LOCATION

Rev	Revision	Drawn	Chkd	Appd	Date
A		MAS	MN	AB	28/01/09
B	ADDITIONAL NOTES ADDED TO THE DRAWING	MAS	MN	AB	12/03/09
C	AS BUILT	MAS	MN	AB	22/07/09
D	AS BUILT FOR SGT1 & SGT3	MAS	MN	AB	18/12/09
E	AS BUILT SGT4 INSTALLED	MAS	DK	MN	31/08/10
F	AS BUILT SGT2 INSTALLED	MAS	DK	MN	11/03/11
G	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	24/10/11

Electricity Alliance

Subcontractor

carillion

EHV PROJECT SERVICES
LOWRY HOUSE
550 MAULDETH ROAD WEST
CHORLTON-CUM-HARDY
MANCHESTER
M21 7AA
TELEPHONE 0161 860 2000

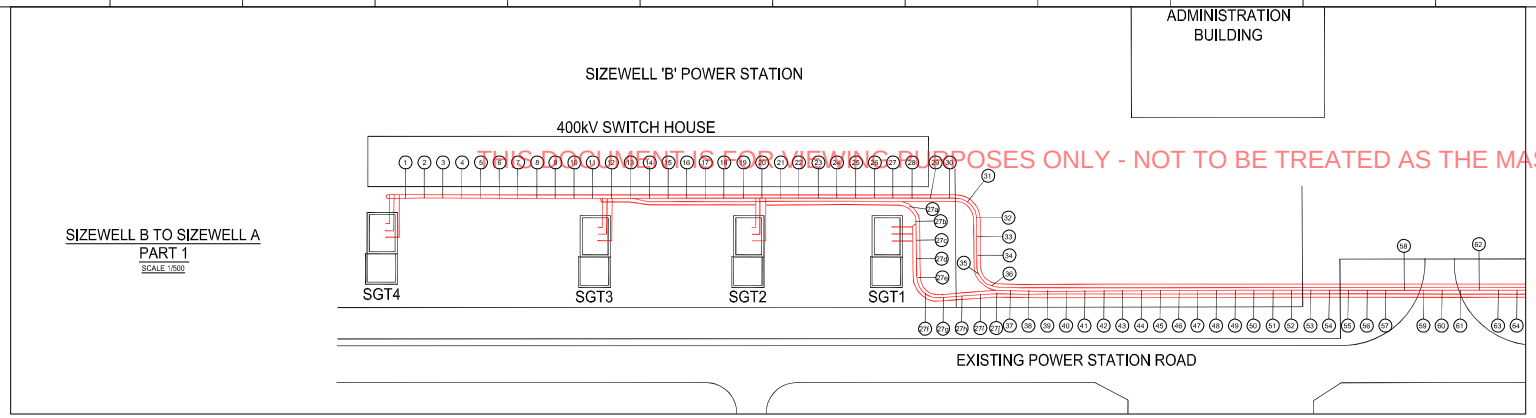
Project Name	LEISTON
Project Ref	
Scheme Ref	15542
Site	LEISTON
Circuit	SGT 1-4
Title	132kV CABLE ROUTE CROSS SECTIONS SIZEWELL A TO SIZEWELL B

Prepared	Checked	Approved	Date Approved
MAS	DK	MN	11/03/11

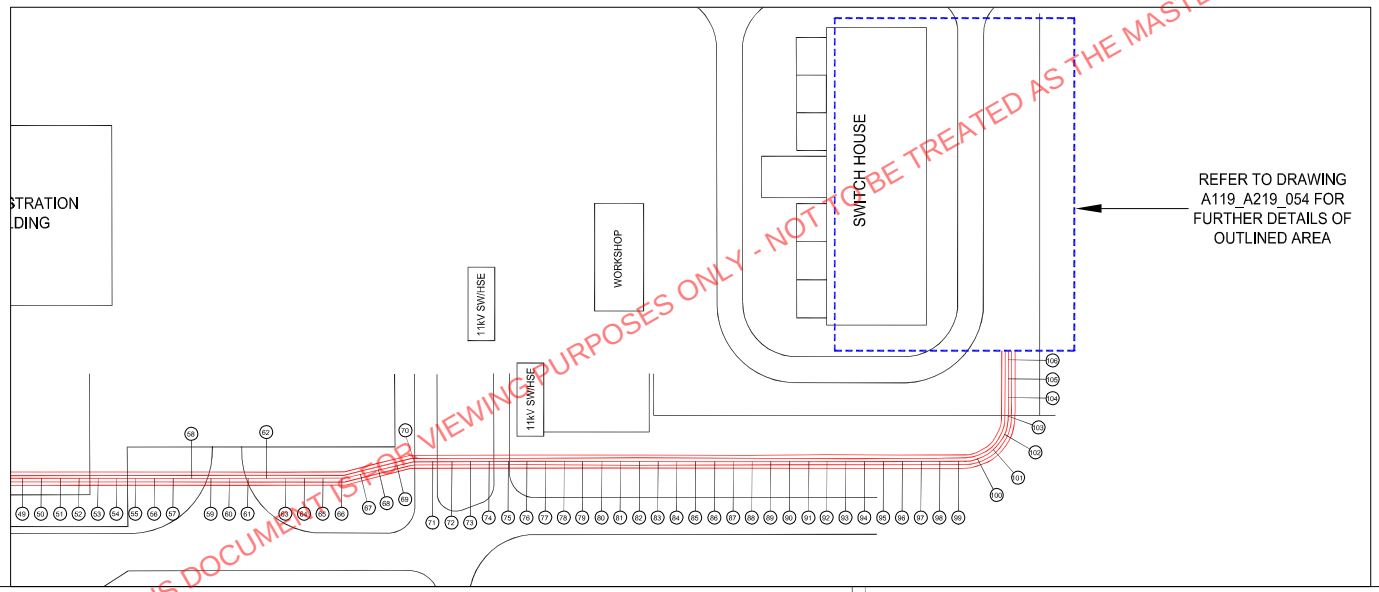
Carillion Drawing No	A119_A219_005		
Originators Drawing No		Scale NTS	Format A1
NG Drawing No	70_SEA_0072	Sheet / Cont	Rev G

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

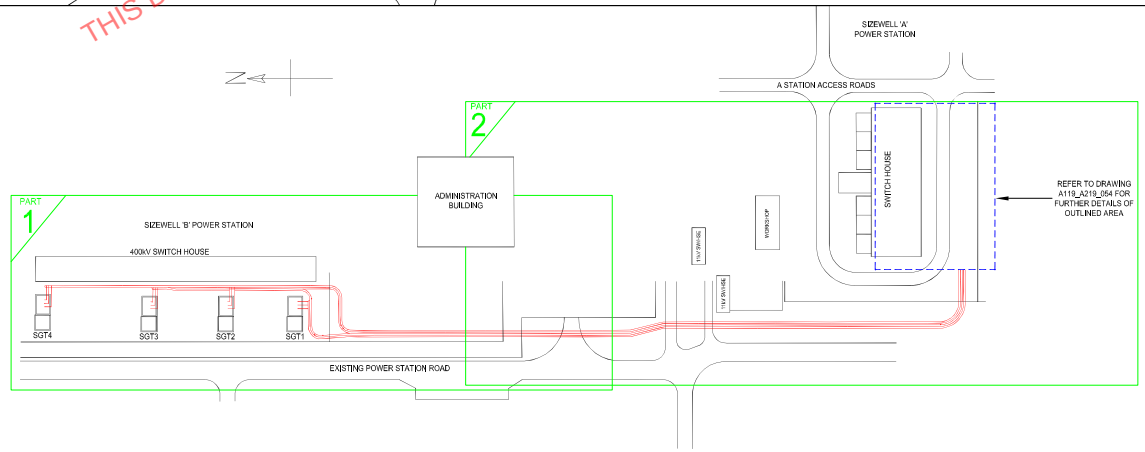
THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER



SIZEWELL B TO SIZEWELL A
PART 1
SCALE 1:500



SIZEWELL B TO SIZEWELL A
PART 2
SCALE 1:500



SIZEWELL B TO SIZEWELL A
OVERVIEW OF ROUTE
SCALE 1/1000

NOTES

CROSS SECTIONS FACING SIZEWELL A

SEE DRAWING A119_A219_001 FOR SIZEWELL 'A' TO LEISTON CABLE ROUTE

AS BUILT DRAWING

ROUTE OF SGT1,2,3 & 4

(X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_005

Rev	Revision	Drawn	Chkd	Accpd	Date
A		MAS	MN	AB	28/01/09
B	ADDITIONAL NOTES ADDED TO THE DRAWING	MAS	MN	AB	16/03/09
C	CABLE DETAIL AT SIZEWELL A REMOVED NOTE ADDED	MAS	MN	AB	22/07/09
D	AS BUILT	MAS	MN	AB	15/12/09
E	NATIONAL GRID UPDATE TP105 COMPLIANT	SMDS	CM/KS	DH/TD	11/12/09

Subcontractor: Electricity Alliance
carillion — EHV PROJECT SERVICES

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	SGT 1-4 132kV CABLE ROUTE SIZEWELL B TO SIZEWELL A

Prepared	Checked	Approved	Date Approved
MAS	MN	AB	11/12/09

Carillion Drawing No: A119_A219_004
Originators Drawing No:
Scale: AS SHOWN | Format: A0
NG Drawing No: 70_SEA_0071 | Sheet | Cont | Rev: E

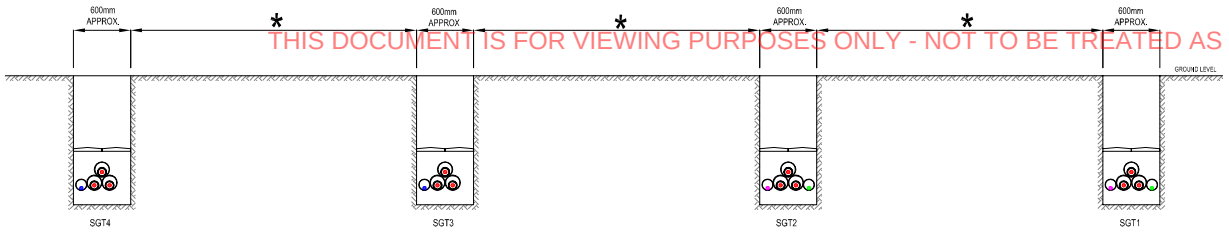
The moral rights in this document and the information contained therein, reproduction, use or disclosure to third parties without express authority is strictly forbidden.

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

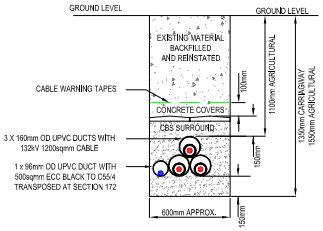
* REFER TO DRAWING A119_A219_001 FOR SPACING DETAILS

(1) TO (5) & (114) TO (157) & (168) TO (185) & (191) TO (215)

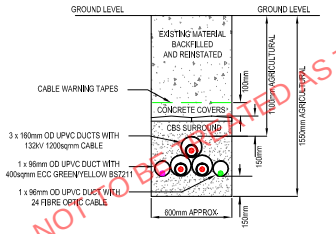
132kV OPEN CUT DUCTED INSTALLATION



TRENCH SPACING (1:25)



SGT3 & SGT4 DUG TRENCH SECTION (1:20)

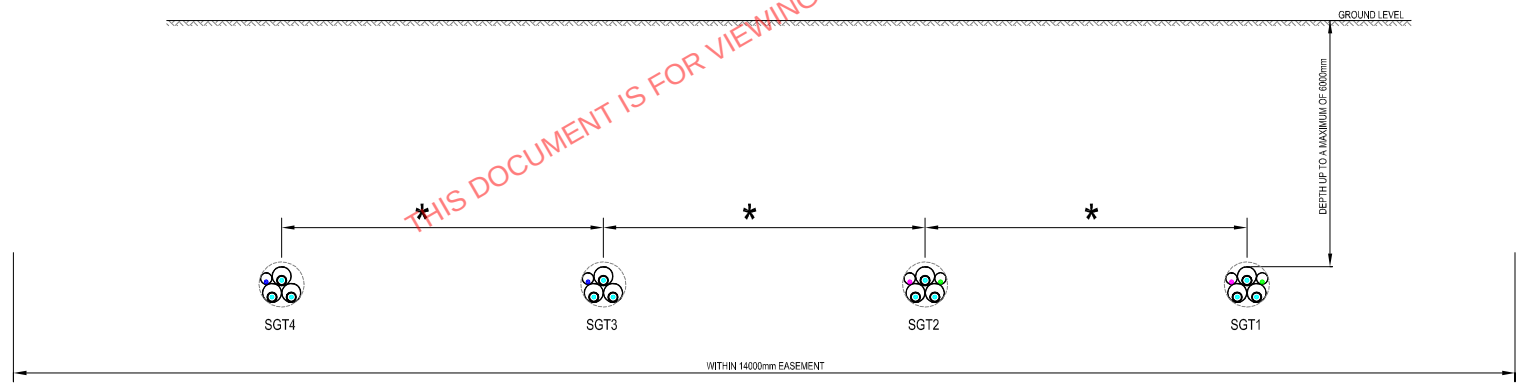


SGT1 & SGT2 DUG TRENCH SECTION (1:20)

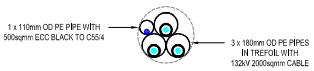
* REFER TO DRAWING A119_A219_001 FOR SPACING DETAILS

(6) TO (113)

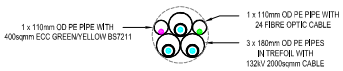
132kV DIRECTIONAL DRILL PIPE INSTALLATION



HORIZONTAL DIRECTIONAL DRILL LAYOUT (1:25)



SGT3 & SGT4 CIRCUIT SECTION (1:20)



SGT1 & SGT2 CIRCUIT SECTION (1:20)

ALL DUCTS INCLUDING THOSE FOR EARTHING CABLES AND FIBRE OPTICS ARE BENTONITE FILLED IN DIRECTIONAL DRILL SECTIONS

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

POWER CABLES OF XLPE CONSTRUCTION RATED AT 132KV, 275KV AND 400KV IN ACCORDANCE WITH NGTS 3.5.2

INSTALLATION REQUIREMENTS FOR POWER AUXILIARY CABLES IN ACCORDANCE WITH NGTS 3.5.7

CONCRETE PROTECTION COVERS IN COMPLIANCE WITH BS3464 AND INSTALLED IN LINE WITH NGTS 3.5.7

ALL POWER CABLES PROTECTED FROM EXTERNAL DAMAGE BY PROTECTION COVERS MANUFACTURED FROM REINFORCED CONCRETE.

WHERE A STABILISED BACKFILL IS USED THE COMPLETE WIDTH OF THE BACKFILLED AREA IS COVERED BY PROTECTION COVERS.

THE WIDTH OF THE CABLE PROTECTION COVERS HAVE 50mm OVERLAP ON EACH SIDE OF THE CABLE OR OUTSIDE CABLE OF A GROUP OF CABLES.

WHERE MORE THAN ONE COVER HAS BEEN USED ACROSS THE WIDTH OF THE CABLES THE JOINT BETWEEN COVERS LIE ABOVE THE SPACE BETWEEN THE CABLES AND NOT OVER THE CABLES.

IDENTIFICATION WARNING TAPES LAID 100mm ABOVE THE CONCRETE CABLE PROTECTION COVERS.

SPECIAL BACKFILL MATERIAL 'STABILISED' COMPRISING CEMENT BOUND SAND (CBS) HAVING A THERMAL RESISTIVITY IN FULLY DRIED OUT STATE NOT EXCEEDING 1.2 DEGREES C m/W AND MADE UP OF 14 PARTS SELECTED SAND BY VOLUME AND ONE PART PORTLAND CEMENT TO BS12 BY VOLUME.

SPECIAL BACKFILL MATERIALS INSTALLED AND TESTED IN ACCORDANCE WITH NGTS SPECIFICATIONS.

BACKFILL FOR POWER CABLES DOES NOT CONTAIN MATERIAL THAT COULD DAMAGE THE OVERSHEATH.

A MINIMUM BACKFILL THICKNESS OF 75mm PROVIDED ABOVE, BELOW AND ALONGSIDE THE CABLE EXTENDING THE FULL WIDTH OF THE TRENCH AND UP TO THE PROTECTIVE COVER.

AS BUILT DRAWING

LEGEND

- 1200sqmm Cu 132kV CABLE TO IEC 60840
- 2000sqmm Cu 132kV CABLE TO IEC 60840
- 500sqmm ECC BLACK TO C55/4
- 400sqmm ECC GREEN/YELLOW BS7211 CABLE IS FOR SUBSTATION EARTHING ONLY AND DOES NOT FORM PART OF CABLE DESIGN SYSTEM
- 20 FIBRE OPTIC CABLE
- (X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_001 FOR LOCATION

Rev	Revision	Drawn	Chkd	Appd	Date
A		MAS	MN	AB	08/12/08
B	400sqmm ECC ADDED	MAS	MN	AB	06/01/09
C	CABLE WARNING TAPE ADDED	MAS	MN	AB	27/01/09
D	ADDITIONAL NOTES ADDED TO THE DRAWING	MAS	MN	AB	12/03/09
E	AS BUILT	MAS	MN	AB	09/12/09
F	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAV457	IH722	24/10/11

Electricity Alliance

Subcontractor

carillion

EHV PROJECT SERVICES

The Matthews
Lomeon Road
Trafford Park
Manchester
M17 1BA
Telephone 0161 886 6000
Facsimile 0161 886 6004

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	132kV CABLE ROUTE CROSS SECTIONS SIZEWELL A TO LEISTON
Prepared	MAS
Checked	MN
Approved	AB
Date Approved	09/12/09
Carillion Drawing No	A119_A219_002
Originators Drawing No	
Scale	
Format	A1
NG Drawing No	70_SEA_0069
Sheet	
Cont	
Rev	F

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

NOTES

CROSS SECTIONS FACING LEISTON SUBSTATION

POWER CABLES OF XLPE CONSTRUCTION RATED AT 132KV, 275KV AND 400KV IN ACCORDANCE WITH NGTS 3.5.2

INSTALLATION REQUIREMENTS FOR POWER AUXILIARY CABLES IN ACCORDANCE WITH NGTS 3.5.7

SPECIAL BACKFILL MATERIAL 'STABLISE2' COMPRISING CEMENT BOUND SAND (CBS) HAVING A THERMAL RESISTIVITY IN FULLY DRIED OUT STATE NOT EXCEEDING 1.2 DEGREES C m/W AND MADE UP OF 14 PARTS 'SELECTED SAND' BY VOLUME AND ONE PART PORTLAND CEMENT TO BS12 BY VOLUME.

SPECIAL BACKFILL MATERIALS INSTALLED AND TESTED IN ACCORDANCE WITH NGTS SPECIFICATIONS.

PRIOR TO BACKFILLING, NATIONAL GRID GIVEN THE OPPORTUNITY TO INSPECT THE INSTALLATION OF CABLE AND ACCESSORIES.

AS BUILT DRAWING

LEGEND

- 1200sqmm Cu 132kV CABLE TO IEC 60840
- 500sqmm ECC BLACK TO CS5/4
- 400sqmm ECC GREEN/YELLOW BS7211 CABLE IS FOR SUBSTATION EARTHING ONLY AND DOES NOT FORM PART OF CABLE DESIGN SYSTEM
- 24 FIBRE OPTIC CABLE
- (X) CROSS SECTION NUMBER - SEE DRAWING A119_A219_054 FOR LOCATION

Rev	Revision	Drawn	Chkd	Appd	Date
A		MAS	MN	AB	15/09/09
B	AS BUILT	MAS	MN	AB	18/12/09
C	AS BUILT SGT4 INSTALLED	MAS	DK	MN	31/08/10
D	AS BUILT SGT2 INSTALLED	MAS	DK	MN	22/03/11
E	NATIONAL GRID UPDATE TP135 COMPLIANT	SM835	CAW457	DH722	25/10/11

Electricity Alliance

Subcontractor

carillion

EHV PROJECT SERVICES
LOWRY HOUSE
550 MAULDETH ROAD WEST
CHORLTON-CUM-HARDY
MANCHESTER
M21 7AA

TELEPHONE 0161 860 2000

Project Name	LEISTON
Project Ref	Scheme Ref 15542
Site	LEISTON
Circuit	SGT 1-4
Title	132kV CABLE ROUTE CROSS SECTIONS AT SIZEWELL A COMPOUND

Prepared	Checked	Approved	Date Approved
MAS	DK	MN	22/03/11

Carillion Drawing No: A119_A219_055

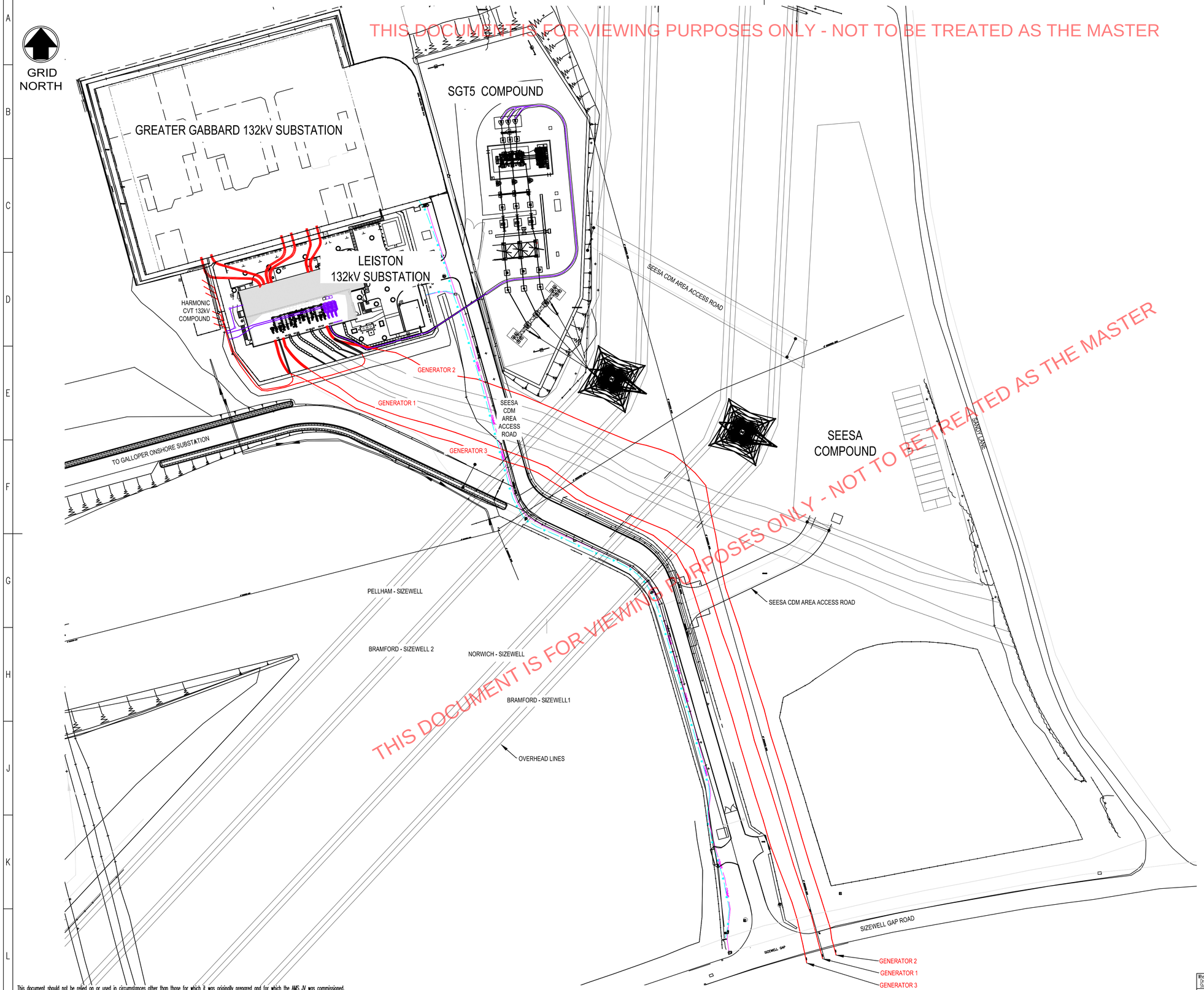
Originators Drawing No:

Scale: NTS | Format: A1

NG Drawing No: 70_SEA_0078 | Sheet | Cont | Rev: E

We reserve all rights in this document and the information contained therein. Reproduction, use or disclosure to third parties without express authority is strictly forbidden.

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER



THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

THIS DOCUMENT IS FOR VIEWING PURPOSES ONLY - NOT TO BE TREATED AS THE MASTER

LEGEND:

- GG OFTO HV CABLES
- NEW GIS EXTENSION
- W — LEISTON SUBSTATION WATER MAIN
- COMMS — COMMUNICATION CABLE

NOTE

1. THIS DRAWING IS A GENERAL PLAN FOR SHOWING SEESA WORKS IN RELATION TO GG OFTO SAFETY ZONE ASSETS. ISSUED FOR INFORMATION ONLY.

THIS DRAWING TO BE PRINTED IN COLOUR

UNCONTROLLED

APPROVED

This document should not be relied on or used in circumstances other than those for which it was originally prepared and for which the AMS JV was commissioned.
The AMS JV accepts no responsibility for this document to any other party other than the party by whom it was commissioned.

ISSUE	ISSUE DATE:	DRWN:	CHKD:	APPR:	
A	26.04.16	BT779	SJH445	PK481	ORIGINAL ISSUE

ISSUE	DRAWN:	CHECKED:	APPROVED:	ISSUE DATE:
B				

When Quoting The Drg No. Please State The Issue	Drawing To BS 8888 Unless Otherwise Stated	All Dimensions In Millimetres Unless Otherwise Stated

Title
LAYOUT DRAWING
GALLOPER WF 340MW CONNECTION
GG OFTO GENERAL PLAN

PROJECT A1
Stage CAD
Scale **NTS**

nationalgrid
SOUTH EAST ELECTRICITY SUBSTATION ALLIANCE (SEESA)
Stokenchurch House
Oxford Road, Stokenchurch
High Wycombe, HP14 3SX

Station/Site **LEISTON 132kV SUBSTATION**
SEESA Project No. **N34168291**
Circuit/Bay **00-COMMON**
Client Scheme No.(s) **32490**
Client Drg No.
SEESA Drg No. **ATW8291-LETN1-00-G0-028**
Sht No. **001** Next Sht
ISSUE: **A**

IF IN DOUBT – ASK

COPYRIGHT – SOUTH EAST ELECTRICITY SUBSTATION ALLIANCE. DATED AS PER ORIGINAL ISSUE DATE – NOT TO BE REPRODUCED WITHOUT WRITTEN PERMISSION.

ORIGINAL SIZE A1 (841x594mm)

Plant Protection
Cadent
Block 1; Floor 1
Brick Kiln Street
Hinckley
LE10 0NA
E-mail: plantprotection@cadentgas.com
Telephone: +44 (0)800 688588

National Gas Emergency Number:
0800 111 999*

National Grid Electricity Emergency Number:
0800 40 40 90*
* Available 24 hours, 7 days/week.
Calls may be recorded and monitored.

www.cadentgas.com

Gail Boyle
Planning Inspectorate
The Planning Inspectorate
Room 3C
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 19/06/2019
Our Ref: EA_GE4B_3NWP_018271
Your Ref: EN010012-000670 ESRI- PART TWO (BK)
RE: Formal Planning Application, Leiston Common, Leiston

Thank you for your enquiry which was received on 11/06/2019.
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.
For details of Network areas please see the Cadent website (http://cadentgas.com/Digging-safely/Dial-before-you-dig) or the enclosed documentation.

Are My Works Affected?

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.
Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.
If the application is refused for any other reason than the presence of apparatus, we will not take any further action.
Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

Cadent is a trading name for: Cadent Gas Limited
Registered Office: Ashbrook Court, Prologis Park, Central Boulevard, Coventry CV7 8PE
Registered in England and Wales, No 10080864

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- Gas service pipes and related apparatus
- Recently installed apparatus
- Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the National Grid or Cadent website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail (click here) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus
The apparatus that has been identified as being in the vicinity of your proposed works is:

- Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus in the vicinity)
- Electricity Transmission overhead lines
- Above ground gas sites and equipment

Requirements

BEFORE carrying out any work you must:

- **Note the presence of an Above Ground Installation (AGI) in proximity to your site. You must ensure that you have been contacted by Cadent and/or National Grid prior to undertaking any works within 10m of this site.**
- Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at http://www.hse.gov.uk
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

Working Near National Grid Electricity Transmission equipment:
If you are carrying out any work in proximity to an overhead line or any excavation that may be near an underground cable then please consult National Grid Technical Guidance Note 287 that can be found at https://www.nationalgrid.com/sites/default/files/documents/8589935533-TGN%20287_Third%20party%20guidance%20for%20working%20near%20NGET%20equipment.pdf Further guidance related to underground cables can also be found at https://www.nationalgrid.com/sites/default/files/documents/8589936512-Excavating%20Safety%20Leaflet%20Electricity.pdf

Excavating Safely - Avoiding injury when working near gas pipes:
http://www.nationalgrid.com/NR/rdonlyres/2D2EEA97-B213-459C-9A26-18361C6E0B0D/25249/Digsafe_leaflet3e2finalamends061207.pdf

Standard Guidance

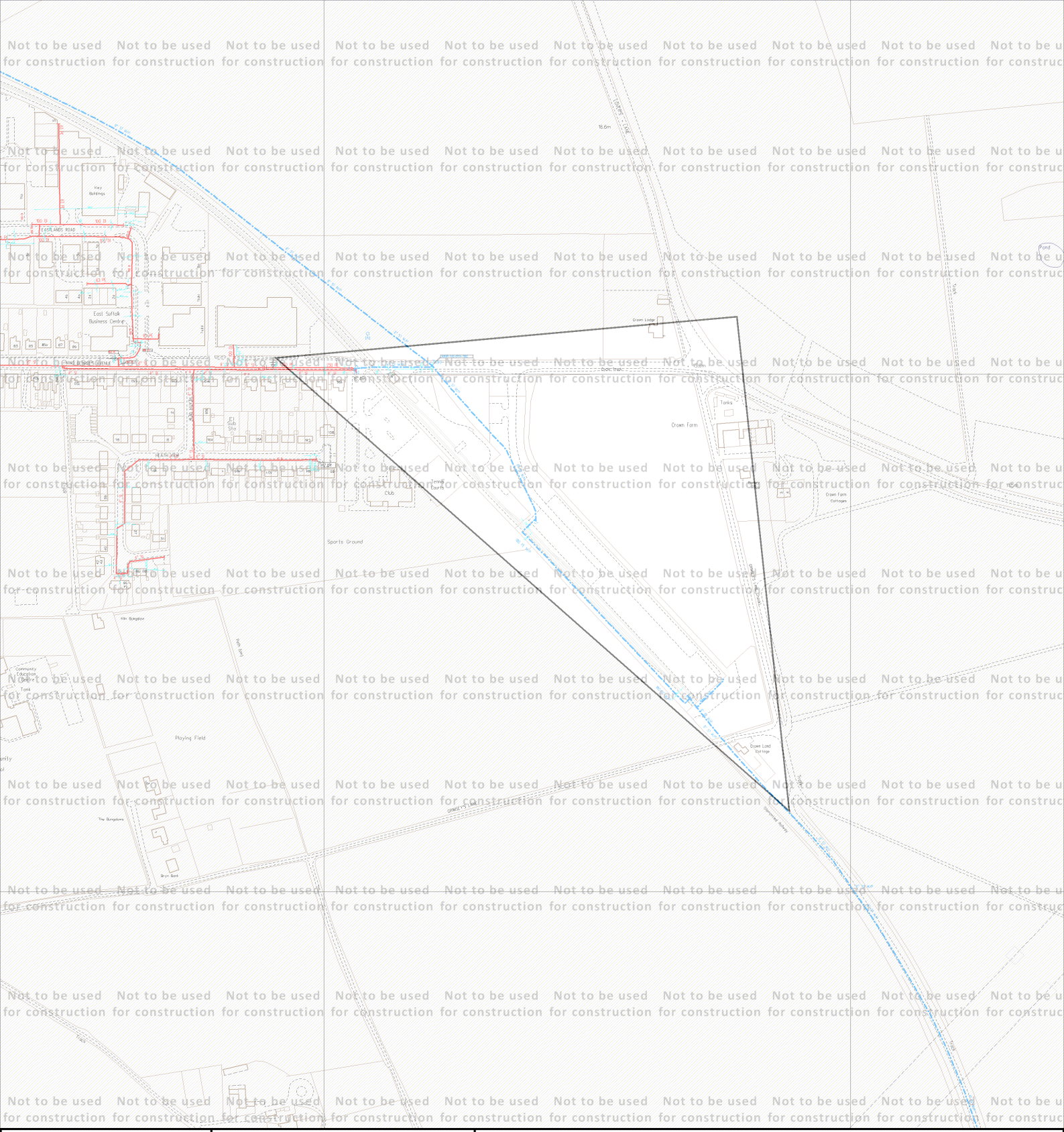
Essential Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982

General Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103

Excavating Safely in the vicinity of gas pipes guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf

Excavating Safely in the vicinity of electricity cables guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf

Copies of all the Guidance Documents can also be downloaded from the National Grid and Cadent websites.



ID: EA_GE4B_3NWP_018271	View extent: 1010m, 1090m	Do not proceed without further consultation
USER: Bethany.Kennard	LP MAINS MP MAINS IP MAINS LHP MAINS NHP MAINS	MAPS Plot Server Version 1.11.0
DATE: 19/06/2019		Cadent Your Gas Network
DATA DATE: 18/06/2019		
REF: EN010012-000670 ESRI- PART		Requested by: Planning Inspectorate
MAP REF: TM4562 CENTRE: 645698, 262316	0m 100m Approximate scale 1:5000 on A4 Colour Portrait	Map 1 of 2 (GAS)

Some examples of Plant Items:

Valve | Depth of Cover | Syphon | Diameter Change | Material Change | Out of Standard Service

This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886

This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

ID: EA_GE4B_3NWP_018271	View extent: 2020m, 2180m	Do not proceed without further consultation
USER: Bethany.Kennard	Underground cables Overhead lines	MAPS Plot Server Version 1.11.0
DATE: 19/06/2019		nationalgrid
DATA DATE: 18/02/2019		
REF: EN010012-000670 ESRI- PART		
MAP REF: TM4562 CENTRE: 645698, 262316	0m 200m Approximate scale 1:10000 on A4 Colour Portrait	Requested by: Planning Inspectorate Map 2 of 2 (ELECTRIC)

This plan is reproduced from or based on the OS map by National Grid Electricity Transmission plc, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024241

This plan shows those cables owned by National Grid Electricity Transmission plc in its role as a Licensed Electricity Transporter (ET). Electricity cables owned by other ETs, or otherwise privately owned, may be present in this area. Information with regard to such cables should be obtained from the relevant owners The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Ancillary equipment such as cooling systems and communication cables are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Grid Electricity Transmission plc or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of cables and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near electricity apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

ENQUIRY SUMMARY

Received Date
11/06/2019

Your Reference
EN010012-000670 ESRI- PART TWO (BK)

Location
Centre Point: 645698, 262316
X Extent: 490
Y Extent: 480
Postcode: IP16 4TP
Location Description: Leiston Common, Leiston

Map Options
Paper Size: A4
Orientation: PORTRAIT
Requested Scale: 2500
Actual Scale: 1:5000 (GAS), 1:10000 (ELECTRIC)
Real World Extents: 1010m x 1090m (GAS), 2020m x 2180m (ELECTRIC)

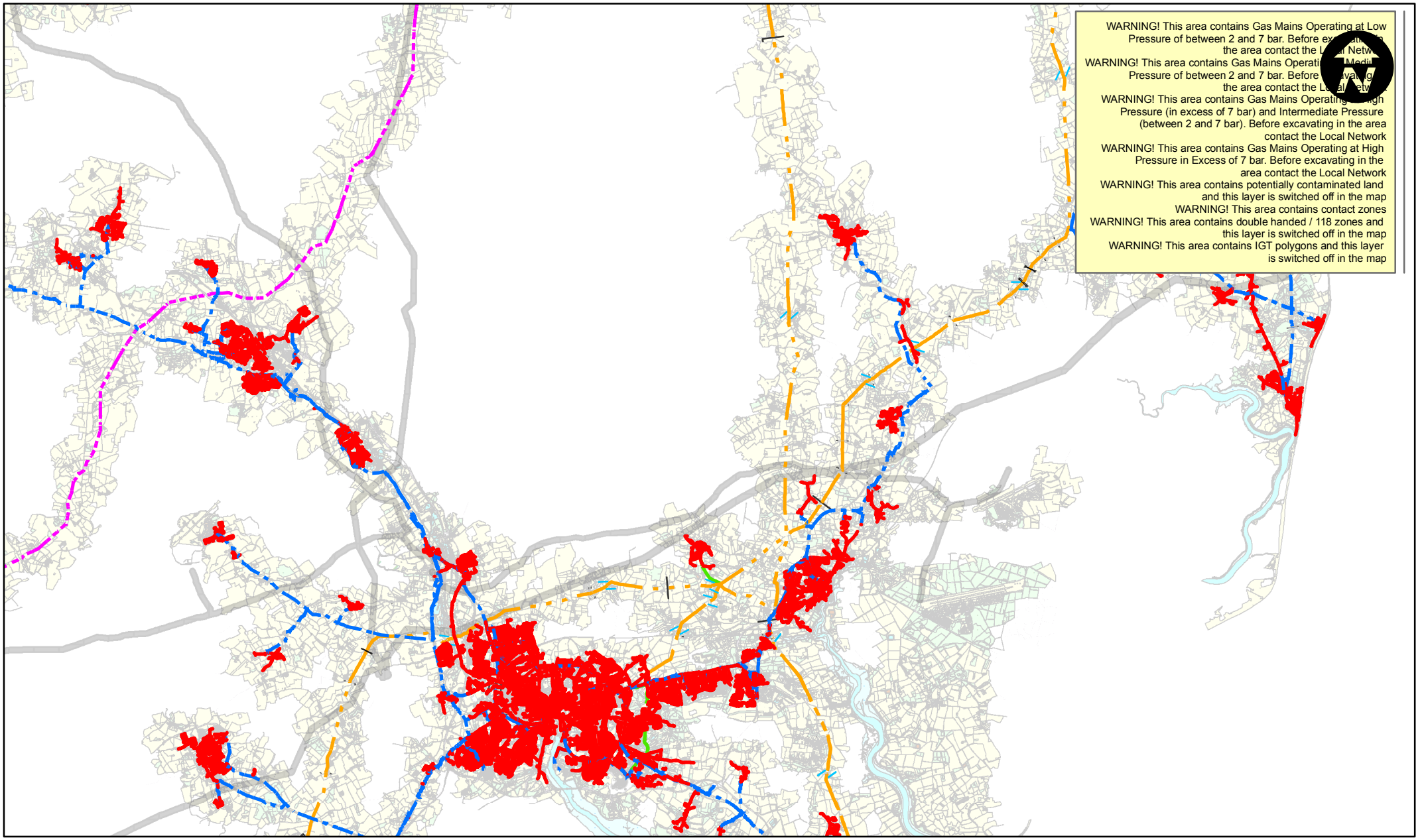
Recipients
pprsteam@cadentgas.com

Enquirer Details
Organisation Name: Planning Inspectorate
Contact Name: Gail Boyle
Email Address: sizewellc@planninginspectorate.gov.uk
Telephone: 0303 444 5068
Address: The Planning Inspectorate, Room 3C, Temple Quay House, 2 The Square, Bristol, BS1 6PN

Description of Works
Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation

Enquiry Type
Formal Planning Application

Development Types
Development Type: Other



SCALE: 1:1,250 @ A4

USER ID: bethany.kennard

DATE: 19-Jun-2019 15:17:51

INTERNAL USE ONLY

MAP REF: 622945, 255954

CENTRE:

L/P GAS MAIN
M/P GAS MAIN
I/P GAS MAIN
H/P GAS MAIN
N/H/P GAS MAIN
PROPOSED PIPE - LP
PROPOSED PIPE - MP
PROPOSED PIPE - IP
ABANDON - LP
ABANDON - MP
Out Of Standard Service

SCHEME: <NG GDFO Scheme Name>

DESIGN: <NG GDFO Design Number>

REVISION: <NG GDFO Revision>

Some examples of Plant Items:

Valve Syphon Depth of Cover Change of Dia Change of Material

This plan shows those pipes owned by Cadent in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners.The information shown on this plan is given without warranty, the accuracy thereof cannot be guranteed. Service pipes, valves, syphons, stub connections,etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, inaccordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and any other apparatus on site before any mechanical plant is used. It is your responsability to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus.The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office.

Crown Copyright Reserved.

Plant Protection map

AGI site

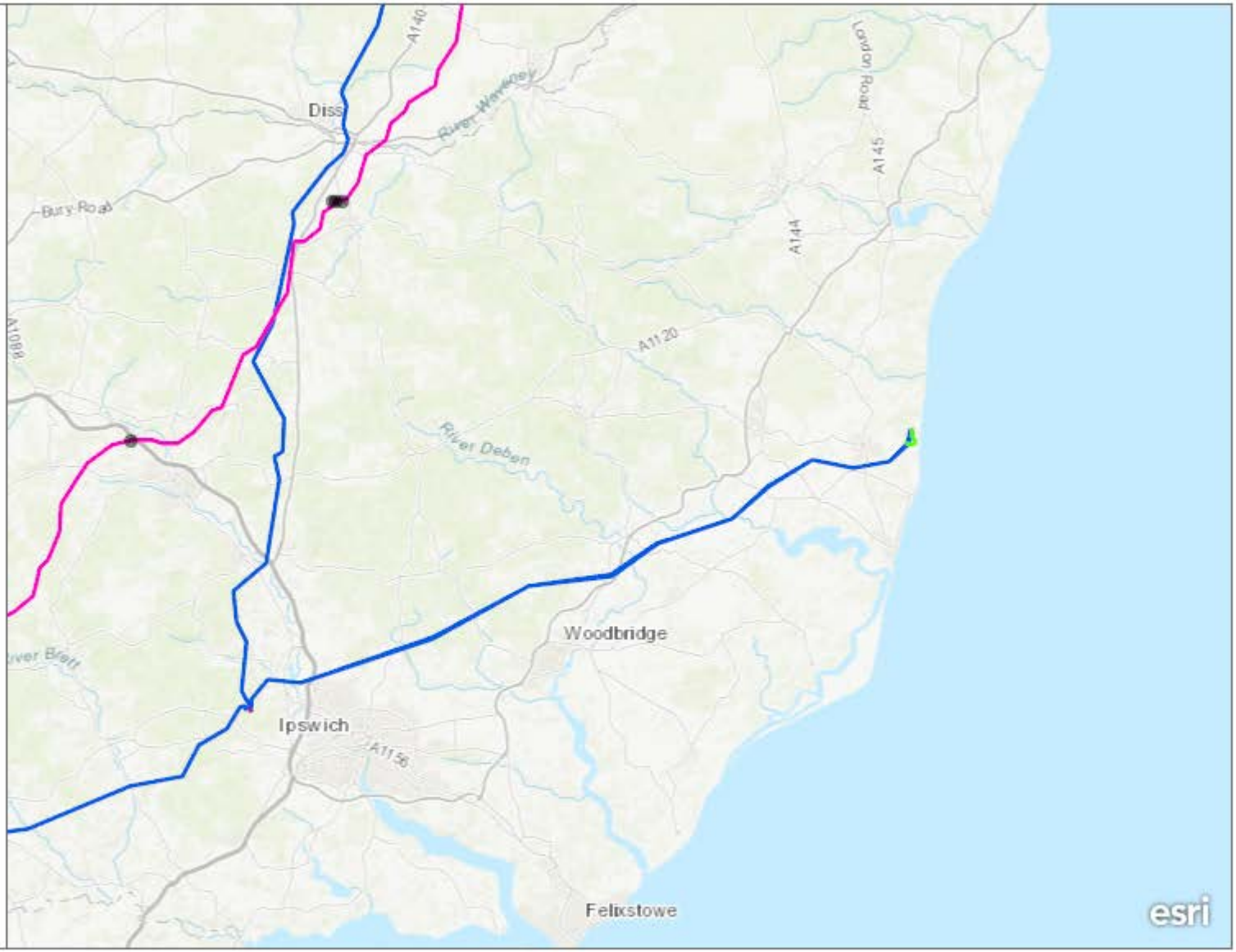
Gas Pipe

Buried Cable

Cooling Station

OHL

Substation



DoBH, OS, Esri, HERE, Garmin, USGS, NGA

Darsham Parish Council

Response to Sizewell C EIA Scoping Report

1. Darsham Parish Council has been made aware of this consultation less than two weeks before the deadline for replies. The report is a complex 947 page document; with the limited resources and timescale available to us our response is necessarily short and concentrates on what we believe are over-riding points of principle.

2. The report appears to be largely based on the contents of the EDF stage 3 consultation document. However, EDF has not to our knowledge made any response to the consultation replies and the EIA scoping report has therefore been based on a document (the stage 3 consultation) that was widely criticised in terms of lack of detailed content. The EIA scoping report does not appear to take account of any of the responses to that consultation.

For example:

3. Suffolk County Council and others cast doubt on the traffic estimates given at stage 3, and called for further monitoring. We would have hoped that EDF would have taken this comment from the roads authority seriously, but it appears to have been ignored. Local parishes, who live by and use the A12 on a daily basis support the need for revision of the traffic estimates. This Parish Council is of the opinion that the stage 3 proposals for the Northern Park and Ride, with roundabouts north of Willowmarsh Lane and at the junction of the A12 and B1122 in Yoxford, coupled with the operation of the level crossing at Darsham will cause traffic gridlock on an already busy trunk road. We highlighted the potential problem of air pollution from vehicle emissions in our stage 3 response, which appears to have been ignored. In addition we pointed out that regular level crossing closures by Network Rail for maintenance, which would exacerbate traffic congestion, had not been identified by EDF at stage 3.

4. At Stage 3 EDF proposed a bypass for the villages of Middleton Moor and Theberton. While accepting that this was better than no by-pass at all, both Suffolk County Council and local Parishes requested that EDF re-consider the proposed W (D2) road route from Benhall direct to Sizewell. We all believe this route to be vastly superior to the EDF proposals in terms of relieving traffic pressure on the villages concerned and providing a lasting legacy for the future. EDF has not responded to this suggestion and now, in the EIA report, it appears that the by-pass proposed at stage 3 will only apply in a road-led scenario. In a rail-led scenario only Theberton itself would be by-passed. This proposal was not in EDF's stage 3 consultation and has not been subject to public consultation.

5. EDF's proposal for a worker encampment at Eastbridge housing 2,400 employees has been widely criticised and opposed at both stages 2 and 3, with Suffolk County Council and local parishes urging EDF to consider other sites and provide a proportion of affordable housing as a legacy for the local area. EDF has continued to ignore these responses.

6. We regret that time and resources do not permit us to comment on the environmental and socio-economic sections of the report, except to say that the information provided by EDF at stage 3 was also widely criticised by respondents as lacking detail. Again, as far as we are aware, EDF has not responded to these criticisms.

7. In conclusion, it seems that the EIA Scoping Report is a blatant attempt to by-pass the statutory consultation process by ignoring responses from statutory consultees to the stage 3 process. As such, an EIA scoping report based on EDF's stage 3 proposals without acknowledging and responding to consultees would almost certainly be subject to legal challenge.

8. **We ask the Planning Inspectorate to instruct EDF to give due consideration and respond to stage 3 responses and prepare a revised EIA scoping report in due course.**

Darsham Parish Council 20 June 2019

Ms Gail Boyle
EIA and Land Rights Advisor
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our ref: AE/2019/124202/01-L01
Your ref: EN010012-000670
Date: 20 June 2019

Dear Ms Boyle

Sizewell C Nuclear New Build Project
Scoping Opinion – Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulation 2017 (the EIA Regulations) – Regulations 10 and 11

We refer to your letter of 23 May 2019 which requests our views on the Sizewell C Environmental Impact Assessment (EIA) Scoping Opinion (dated May 2019) related to the proposal for a new nuclear power station and associated development sites.

Please see our detailed comments on EDF Energy's EIA scoping below. For ease of reference we have followed the same order of the headings presented in the EIA Scoping Report.

6.5 Air Quality

We wish to draw the applicant's attention to the change in the Environment Agency's Regulatory Guidance Note 2 (RGN2) which has removed the *deminis* rule for aggregation of combustion plant and further, removes the exclusion of temporary plant. As a result all combustion plant, inclusive of those used during the construction phase may now require a permit under the Environmental Permitting (England and Wales) Regulations 2018 (EPR) (as amended) as a Section 1.1 Combustion Activity (i.e. combustion plant that aggregate to over 50 MW). This alteration requires consideration in the Environmental Statement (ES) where potential impacts from construction require quantification through modelling and the implementation of appropriate abatement strategies. Such strategies may include early installation of a 12V electrical ring main.

6.7 Terrestrial Ecology and Ornithology

The ES should identify opportunities for net biodiversity gain which can be implemented as part of the overall development. The following comments reference specific paragraphs in the Scoping Report.

6.7.3 In table 7.2.1 as listed in the 2014 Scoping Report no mention is given to fresh water ecology as an ecological resource and study area. Due to the potential impacts on protected species on several watercourses both on the main development site and

associated development sites the following study areas should be included: freshwater fish, freshwater invertebrates, and freshwater plant communities.

Baseline surveys should be undertaken at all sites where construction on or near, or modification of watercourses will take place. Appropriate fishery surveys should be undertaken to assess for the presence of eels (Anguilla anguilla) which are protected under the Eels Regulations 2009 and are a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006. Appropriate macrophyte surveys should be undertaken to check for the presence of greater water parsnip (Sium latifolium) which is a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and listed as a red list GB endangered species. A record of presence exists for greater water parsnip on Sizewell Marshes. Aquatic invertebrate surveys should be undertaken to assess the presence of mud pond snail (Omphiscola glabra) which is a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and has accepted records of presence in Suffolk both to the north and south of Sizewell. Surveys should also be undertaken for Desmoulin`s whorl snail (Vertigo moulinsiana) which is a wetland dependant snail listed as a species of principal importance for the purpose of conservation of biodiversity under the NERC Act 2006 and an annex II species under the Habitats Directive. Accepted records of presence in Suffolk both to the north and south of Sizewell exist for this species.

Careful consideration needs to be given to potential impacts on watercourses from highways runoff from operational use and during the construction phase to prevent a deterioration in water quality. The design of any SUDS features in relation to highways drainage and surface water drainage from the main development or associated developments should maximise the benefits to biodiversity from these features by creating ponds with gentle sloping sides that have pooled areas to retain water through periods of dry weather with appropriately planted edges.

Assessment of barriers to migration needs to be fully considered for physical barriers in any watercourse and the impacts of culverting watercourses as this will also prevent the movement of fish, eel, invertebrate and mammal communities.

The lack of reference to fish and eels was also raised in our response to the 2014 Scoping Report.

6.7.19 Further surveys are required to assess the impacts to habitat features of interest at the proposed associated development sites as insufficient evidence has been supplied to assume no significant effects at this point.

6.7.20 Detailed information is requested on all proposed crossing options to date for all watercourses affected, both on the main development site and associated off-site development sites. We generally oppose the culverting of watercourses and viaducts/open span bridges should be the default choice where new or replacement watercourse crossings are required. Culverting watercourses should be avoided unless no reasonably practical alternative is available. The cumulative effects to the connectivity of habitats cannot be accurately assessed without knowledge of the impacts of crossings on the surrounding watercourses. Watercourse crossings also have the potential to impact fish populations in addition to otter and water vole.

6.7.21 Under part 4 of Eels Regulations 2009 the following requirements exist:

- The requirement to notify the Environment Agency of the construction, alteration or maintenance of any structure likely to affect the passage of eels

Cont/d..

- Where any such structure exists, the requirement to construct and operate an eel pass to allow the free passage of eels
- The removal of any obstruction, if deemed necessary

The installation of a control structure on the Sizewell Drain will need to address these points and we require the designing in of an eel and fish pass in this structure. This will require sign off from our fish pass panel. The proposed realignment of the Sizewell Drain and construction of water control features may impact on the hydromorphology and ecology of the watercourse. These issues will need to be included within the scope of the EIA. The preferred option should be to avoid the need to construct new water level control structures.

6.7.22 In the absence of the baseline ecological data it is premature to conclude that no significant effects will occur during the operation of the associated development sites.

6.7.26 Control of water entering the Sizewell Drain should be controlled by preventing of water ingress from the main development site in the first instance, this will reduce impacts to the ecology from a control feature. If it is not possible to prevent ingress of water then consideration of the Eels Regulations 2009 is required as previously stated.

Clarification is sought regarding the reinstatement of the natural substrate in front of the SZC site after construction has finished. Is the plan to only reinstate once, or to reinstate when needed due to the loss of material from coastal processes? We would like to ensure this habitat which is utilised by specific coastal vegetation communities is not lost in the long term with consideration given to compensation options. This issue should be fully addressed as part of the EIA.

It is important to ensure that the receptor sites created cater for all life stages of all the species that will be relocated to them, and that opportunities for net biodiversity gain are incorporated into their design. Pond features should be included in all relocation sites for this reason.

Would the captured and treated water be discharged to sea or to a watercourse on site? The design of any SUDS features in relation to highways drainage and surface water drainage from the main development or associated development should maximise the benefits to biodiversity from these features by creating ponds with gentle sloping sides that have pooled areas to retain water through periods of dry weather with appropriately planted edges. Consideration of how this can be achieved should form part of the EIA.

6.7.27 More detail of the proposed work and mitigation is requested to be able to assess the effectiveness of these mitigation measures for legally protected species.

6.7.28 It is important that the crossing of all watercourse considers the need for this mitigation measure to allow the free passage of otters and water voles at any time of the year and to not impede the passage of eels and freshwater fish.

6.11 Groundwater and Surface Water

Water Resources

No consideration has been given to the assessment of the requirement of new water resource. Our comments submitted in response to the previous 2014 Scoping Opinion are unchanged and have yet to be considered fully.

Cont/d..

There is no clear indication of how water will be sourced - either for construction, or operation. The availability of water resources is an important consideration for the proposed development. We will have to agree to the water supply strategy, which will be presented alongside the ES. We refer the applicant to our earlier general comments on water resources made in 2014.

The infrastructure associated with construction (for example concrete batching plants) will require significant volumes of water. Furthermore, there is no indication of how water will be sourced for the large number of workers who would be resident on the accommodation campus. There will presumably also be a potable water supply requirement for the operational power station. Given the local environmental setting, and the scarcity of water resources in Eastern England, this is an important consideration and may directly affect design proposals. It is therefore our view that the issue of water resources must be scoped into the EIA.

Any effect of a proposed abstraction on licenced and unlicensed abstractions and the environment should be considered. Further, any additional groundwater abstraction needs to be considered against the local Water Framework Directive (WFD) status of both groundwater and surface water. No new abstraction will be permitted from non-compliant WFD bodies and no new resource will be permitted if it is shown that it will result in deterioration of WFD status of a groundwater or surface water body. We recommend these points are addressed as soon as possible given the scarcity of water resources in the vicinity of Sizewell C and the potential restrictions which may occur.

There appears to be an assumption that additional monitoring, incorporated into the model, has resulted in a ‘fit for purpose’ calibrated model which can be used to assess groundwater and surface water impacts associated with construction. However, agreement of whether or not the model is ‘fit for purpose’ has not yet been concluded.

Section 6.12.9 States that all monitoring data has been completed with respect to surface and groundwater baseline conditions. However, the EA are aware that EDF have not finished baseline assessment and intend to undertake further groundwater tests. It would seem sensible to include details of those ongoing tests within the EIA. Dewatering is now a licensable activity under the Water Abstraction and Impounding (Exemptions) Regulations 2017. The ES should seek to identify impacts associated with dewatering and whether the activity is exempt or requires permits for abstraction and/or discharge; these concerns should be fully addressed.

<u>Water Quality</u>

The Secretary of State advised in their 2014 Scoping Opinion that the ES must detail the proposed foul water management strategy. The 2019 Scoping Report does not indicate that this approach will be taken, and the response given states that the management of foul water will form part of the outline Drainage Strategy which will accompany the ES. The Drainage Strategy should address the construction and operational phases of development for the main site and where applicable associated development sites. There are a number of potential options for disposing of foul water which will require detailed consideration and consultation with relevant organisations, including the Environment Agency. The potential impacts associated with each option will need to be assessed and therefore we maintain our view that this needs to be scoped into the ES.

Cont/d..

6.13 Flood Risk

We are pleased to note that the Scoping Report now includes flood risk as a separate issue with greater detail on fluvial and tidal flood risk. We note a Flood Risk Assessment (FRA) will be undertaken for sites that fall within Flood Zone 3. This will consider all sources of flooding for both on site and off site flood risk over the lifetime of the development (section 6.13.7). The updated EIA scoping also references that assessment will be undertaken for actual and residual flood risk such as breach and overtopping of the mitigation mechanism/defences. It is understood an FRA will be undertaken for each site. Section 6.13.2 states that the ES will contain a summary of the FRA in the groundwater and surface water chapters, but the FRA should also be used to inform the Flood Risk section.

We agree with Table 6.19 which details the sites that are at risk of flooding and which Flood Zones they fall within. However as noted in our response to the Stage 3 consultation we note the Yoxford roundabout site boundary abuts onto the Minsmere River which is designated a main river. There is therefore potential to impact the main river and a flood risk activity permit may be required depending on what the work entails. Some of the sites that fall under the minor rail and road improvements are also near to main rivers or areas of flood risk. It is noted these are described as minor works but it is not clear what the works will entail and if they will impact the main river or require a permit. Please see the flood risk activity permit section below for further advice.

The approach to considering climate change has been identified in section 6.13.19 and 6.13.20. We note this has identified the latest climate change guidance available including UKCP18. We are also pleased to note that the latest flood mapping and modelling available has been referred to including the new Essex Norfolk and Suffolk Coast Model completed in 2018.

In order to assess the fluvial and tidal flood risk detailed flood modelling is being undertaken. This work is currently underway in consultation with us ahead of DCO submission.

The FRA will consider flood risk during construction and operation of Sizewell C. It is understood that a separate planning application will be required for the decommissioning phase of development.
Section 6.13.27 details the potential mitigation that may be required as a result of the flood risk impacts arising from the proposed development, such as compensatory flood storage. It is possible that other mitigation may need to be considered depending on the flood risk impacts shown by the flood modelling for both fluvial and tidal flood risk. It is not limited to compensatory storage.

Bullet point 2 of section 6.13.27 refers to EA Flood Risk Standing Advice it should be noted that this advice only applies to certain development vulnerabilities, within Flood Zone 2 and minor extensions in Flood Zone 2 and 3. Although it is a useful guide it cannot be applied to all development types and Flood Zones.

Environmental Permit for Flood Risk Activities

Our previous response to the 2014 EIA Scoping refers to Flood Defence Consents (FDC's). FDC's now fall under the Environmental Permitting (England and Wales) Regulations 2016. Under these regulations the applicant may need an environmental permit for flood risk activities rather than a flood defence consent. A flood risk activity

permit may be required for work in, under, over or within 8 metres of a fluvial main river, flood defence structure or culvert or within 16m of a tidal main river, flood defence structure or culvert. A permit may also be required for works beyond 8 or 16 meters which are on a floodplain, if the activity is likely to divert or obstruct flood water, damage river control works or affect drainage. Please note this is a separate permission to any planning permission.

6.15 Marine Water and Sediment Quality

Section 6.15.24 refers to the discharge of groundwater and treated sewage effluent during the construction period. However, it is unclear what will happen to site drainage and other effluents prior to completion of the Combined Drainage Outfall (CDO), or what the impact of these effluents will be on the environment. We advise that a separate assessment will be required for any discharges made prior to the completion of the CDO.

In response to the 2014 Scoping Report we advised that the impacts from Sizewell C needs to be assessed with Sizewell B in operation as the overlap in operation is potentially significant. No response has been provided for this comment, and section 6.15.4 does not clearly state the baselines to be considered.

6.16 Marine Ecology

The 2014 Scoping Report includes reference to low velocity side entry (LVSE) intakes, fish recovery and return (FRR) and acoustic fish deterrent (AFD) as mitigation measures. These measures are not included in the 2019 Scoping Report. It is therefore unclear whether this mitigation is still proposed and section 6.16.3 does not include reference to a change in approach if they are no longer proposed.
Section 6.16.46 refers to the need for impingement assessments. Impinged and entrained organisms must be considered to be two parts of one whole, which is entrapment. Biomass and abundance of loss to a population must be considered together. Otherwise there is the potential to underestimate the loss and the full impact of entrapment will not be understood. We advise that a complete entrapment assessment should be undertaken to inform the ES.

Section 6.16.58 states that the scale of assessment of cumulative ecological impacts will vary dependent upon the scale of movement of the receptor organism, giving the example of harbour porpoise being assessed at the scale of the Southern North Sea SAC. We welcome this change in approach from the 2014 Scoping Report which proposed to assess cumulative ecological impacts within a 20km radius of the DCO boundary.

We advise that the Countryside Rights of Way (CRoW) Act is not referenced in the Scoping Report as legislation that needs to be considered. Many SSIs are included within SAC/SPA boundaries and impacts will be assessed under HRA legislation, but this is not the case for all SSSIs within the SZC zone of impact. Those outside of SAC/SPA boundaries will need to be assessed under the CRoW Act. Without acknowledging CRoW there is a risk that the information will not be supplied in the ES that we will need to assess permit applications with regard to potential for damage to SSSIs.

6.18 Radiological Assessment

This section of the Scoping Report is brief, and notably contains less technical detail than the 2014 Scoping Report. It is unclear whether this is because the 2014 Report remains valid and will be included when preparing the ES, or whether the robustness of the proposed radiological assessment has intentionally been reduced. The radiological assessment has been scoped in, and we expect the ES to cover this topic in a comprehensive manner. We welcome reference to the inclusion of the final radiological impact assessment results in the ES.

Section 6.18.3 discusses the work undertaken to date, and makes reference to data such as Habitat Surveys in addition to the preliminary radiological impact assessment. Habitat Surveys and Habits Surveys are two separate matters which can easily be confused with each other due to their similar names. In this instance it is likely that Habits Surveys are being referred to and care must be taken in the preparation of the ES to avoid this error to ensure the technical credibility of the report.

6.19 Major Accidents and Disasters

It is noted that this section has been included as required following the amendments in the EIA regulations in 2017 and therefore this was not included in 2014 Scoping Report. We welcome its inclusion and consideration within the ES and we are further pleased to see the extent of legislation that will be considered in the preparation of this chapter. We also commend the applicant in their intension to undertake an engagement strategy which includes relevant local authorities as part of the development of this chapter. We would also encourage the applicant to consider incidents and accidents at relevant facilities that have occurred both in the UK and abroad (as required by the control of major accident hazard regulations 2015) to ensure that lessons learned are incorporated.

6.20 Waste Management

We are engaging with EDF Energy regarding the production of their Waste Management Strategy, and the Scoping Report reflects the requirements that we would expect to be included in the ES.

Should you have any questions then please do contact me on the details below.

Yours sincerely,

[redacted]

Eleanor Stewart
Nuclear New Build Project Specialist
Direct dial: 020 8474 8097
Email: [redacted]

End

From: [redacted]
To: SizewellC
Subject: Your Reference: EN010012 Our Reference: PE138749. Plant Not Affected Notice from ES Pipelines
Date: 29 May 2019 12:35:20

Sizewell C
The Planning Inspectorate

29 May 2019

Reference: EN010012

Dear Sir/Madam,

Thank you for your recent plant enquiry at: Sizewell C Nuclear Power Station.

I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP Utilities Group Ltd are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com

Yours faithfully,

Plant Protection Team
ESP Utilities Group Ltd

Bluebird House
Mole Business Park
Leatherhead
KT22 7BA
☎ 01372 587500 01372 377996

http://www.espug.com

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

Please consider the environment before printing this e-mail

Essex County Council
County Planning
County Hall
Chelmsford
Essex CM1 1QH

Essex County Council

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: MW/G&D/SizewellC 4
Your ref: EN010012-000670
Date: 18 June 2019

Dear Sirs

Re: Town and Country Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

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

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter as dated 23 May 2019 with reference to the above. Essex has been correctly identified as an appropriate body to be consulted before any scoping decision is issued and would like to make the following comments.

We are asked to inform you of the information we consider should be provided in the Environmental Statement (ES) as a consultee in this process. We note the applicants correct assumption that despite receiving such an opinion from the Planning Inspectorate (PINS) in 2014 that changes to legislation and the proposal means that a new Scoping Opinion is needed.

The documents as submitted by the Applicant are noted and have been considered against the necessary legislation. This response from the Council should not be construed to imply that the Council either agrees with the comments as submitted by the Applicant and are without prejudice to the formal Development Consent Order (DCO) process.

The development site is extensive and includes not only the application site but extensive off site associated development including park and ride schemes; village bypasses; park and ride facilities; a new dedicated access road extensions and changes to the existing rail lines; a large construction area; construction campus and associated major development. This response seeks to cover this associated development as well and considers the impact on the same.

Located close to the settlement of Leiston the development is in a location of sporadic village and hamlet developments, in an essentially rural location on the coast, with a significant number of statutory and non-statutory dedicated sites for nature conservation in immediate proximity.

The Council's opinion sets out what information it considers should be included in the ES for the as proposed development and takes into account the most up to date EIA Regulations, the nature and scale of the development as proposed, the nature of the receiving environment, and the current best practice is the preparation of ES's.

It is considered that there are a number of key potential scoping topics which need to form the ES, including the following:

- Socio economic
- Transport and highways
- Skills and Employment
- Terrestrial ecology and ornithology
- Biodiversity and Geology
- Historic Environment
- Ground and Surface Water
- Marine Water Quality and Ecology
- Coastal geomorphology and hydrodynamics
- Tourism and Recreation
- Construction Environmental Management Plan
- Decommissioning Environmental Management Plan
- Waste Management, Spent fuel, and radioactive waste management
- Minerals Supply and Management Plan
- Supply chain
- Habitat assessment
- Landscape and visual impact
- Flood Risk Assessment
- Flood defences and coastal protection
- Water quality and waste water disposal
- Soils, Geology and Agricultural Land Quality
- Amenity including Noise and vibration, Air quality, Light pollution, etc
- Community and In-combination Impact
- Recreation Impact
- Tourism and Leisure
- Rights of Way, Bridleways, Cycling, Access to Land and Coastal Access
- Accommodation & Housing
- Health and Safety

- Cumulative Impact
- Population Increase and Impact
- Education and skills
- Legacy
- Climate Change Adaption
- Impact of and on rail level crossings
- Impact of and on the electricity generating network

Since the submission of the previous Scoping Report it is noted that Wallasea Island in Essex is closed and has now stopped accepting material.

In detail the vehicle and HGV movement to the site should be expressed as vehicle movements (number in, and numbers out).

It is noted that there appears to be no reference to any minerals supply chain. The proposed development will require a significant amount of construction materials as will the significant other infrastructure projects in the south east not least of which is the planned increase of 180,000 dwellings in Essex, associated road improvements and DCO applications for roadworks coming forward. In order to plan for and provide for the supply of materials the supply chain needs to be explained.

Essex County Council also notes that it will be necessary to carry out additional assessments not least of which would be one under the Conservation of Habitats and Species Regulations 2010.

Yours sincerely

[redacted]

Matthew Thomas
Growth and Development Manager

Enquiries to: Mark Woodger
Principal Planner (Major Developments and New Communities)
Planning Service
Telephone: +443330133338
Email: [redacted]

From: [redacted]
To: SizewellC
Subject: RE: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation
Date: 24 May 2019 09:34:18
Attachments: image001.jpg

Good morning,

We have no assets affected.

Many thanks,

SIMON WATTON | Gas Design Engineer
Direct: 0114 263 7286
Email: simon.watton@fulcrum.co.uk | Web: www.fulcrum.co.uk

Address: Fulcrum Pipelines, 2 Europa View, Sheffield Business Park, Sheffield, S9 1XH. Tel: 03330 146 455

Fulcrum News:

Fulcrum to end installation of classic domestic meters in support of new government obligations. Read more

Fulcrum's Assets Director, Carly Gilchrist named "Manager of the Year" title in prestigious Gas Industry Awards 2019.. Read more

---

From: SizewellC <sizewellc@planninginspectorate.gov.uk>
Sent: 23 May 2019 11:03
Subject: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation

---

This email was sent by an external party
It may contain links, a virus or attempt to steal personal data. If in doubt use the 'Phish Alert' button or delete it.

Dear Sir/Madam

Please see attached correspondence on the proposed Sizewell C Nuclear Power Station. Please note the deadline for consultation responses is 20 June 2019 and is a statutory requirement that cannot be extended.

Kind regards,
Gail Boyle
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN
Twitter: @PINSgov
Helpline: 0303 444 5000
Email: SizewellC@planninginspectorate.gov.uk
Web: http://infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning website)
This communication does not constitute legal advice.
Please view our Privacy Notice before sending information to the Planning Inspectorate.

This email and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the email and any attachments. You should not disclose, copy or take any action in reliance on this transmission. You may report the matter by calling us on 03330 146 466. Please ensure you have adequate virus protection before you open or detach any documents from this transmission. The Fulcrum Group does not accept any liability for viruses. An email reply to this address may be subject to monitoring for operational reasons or lawful

business practices.

From: [redacted]
To: SizewellC
Subject: Sizewell C Nuclear Power Station
Date: 07 June 2019 08:09:12
Attachments: [redacted]

Good morning,

Thank you for sending the relevant information and material regarding the Reinforcement to the Sizewell C Nuclear Power Station.

Harlaxton Gas Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe

Gas Networks logo

Toll Bar Road, Marston, Grantham, Lincs, NG32 2HT

This e-mail and any attachments may be confidential and the subject of legal professional privilege. Any disclosure, use, storage or copying of this e-mail without the consent of the sender is strictly prohibited. Please notify the sender immediately if you are not the intended recipient and then delete the e-mail from your Inbox and do not disclose the contents to another person, use, copy or store the information in any medium

cid:image009.png@01CF322E.284B9480

Historic England

Gail Boyle
EIA and Land Rights Advisor
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: PL00032773
Your ref: EN010012-000670

Telephone 01223 582710

20 June 2019

Dear Gail Boyle,

Request for Scoping Opinion under the Town and Country Planning (EIA) Regs 2017 (As Amended) for the development of a new nuclear power station and associated on-site facilities, and other associated permanent and temporary off-site development

Thank you for your letter dated 23 May 2019 notifying Historic England that a scoping opinion is required for the above development. Your letter was accompanied by the applicants EIA Scoping Report (ref: Sizewell C Project - EIA Scoping Report, dated May 2019.

The historic environment is a finite and non-renewable environmental resource which includes designated heritage assets, non-designated archaeology and built heritage, historic landscapes and unidentified sites of historic and/or archaeological interest. It is a rich and diverse part of England's cultural heritage and makes a valuable contribution to our cultural, social and economic life.

We acknowledge and confirm our view is that the impact upon the historic environment is likely to be significant in EIA terms, and agree that the Historic Environment should be scoped into the Environmental Statement and the approach set out here builds on previous assessments. We have also commented on the EIA scoping report in 2014, and our response is acknowledged here in this report. Our comments in relation to previous PEIR stages would also need to be taken into account

POSITIVE ABOUT DISABLED PEOPLE
Stonewall DIVERSITY CHAMPION

Although our remit is primarily in relation to scheduled monuments and highly graded designated[1] heritage assets, we are concerned with direct impact upon non-designated heritage assets within the development area, and have previously supported the LPA archaeological advisors in developing appropriate strategies to mitigate these impacts. We will continue to provide support in this as required. We are content however that all these matters would be fully addressed in the emerging Environmental Statement (ES).

In terms of the Scoping Report, we broadly support the approach set out by the applicant, in relation to the historic environment, we have set out some more specific points below in relation to the various chapters. We also accept the Rochdale envelope approach is an appropriate approach for major developments such as this (see for example Chapter 3.1.2 - 12), it is however of concern in relation to our statutory remit that certain elements of the projects have still not been finalised, for example the delivery of the project via either a road or a rail led strategy. We feel greater clarity is still needed on this to ensure we can deliver and appropriate responses, and to enable a position can be developed and explored in relation to the impact upon Leiston Abbey (2nd site), and other historic environment receptors. We are concerned that options are still being considered at this stage.

We did note that in the LVIA Chapter (6.6) there is no mention of the assessment of historic environment as receptors in terms of visual impact, and how this will be cross referenced to the heritage chapter. A summary of the result of the historic environment assessment would be appropriate and as noted before we recommend the delivery of a cross referenced LVIA and Historic Environment chapter as part of the ES. We also note and support the proposal to update to the sea scape character assessment, and to update the cumulative impact assessment in light of new development proposals. The recently proposed offshore wind farms are particularly important with in relation to cumulative impacts upon Leiston Abbey (1st Site). Where relevant, the cultural heritage should be cross-referenced to other chapters or technical appendices; for example LVIA, noise, light, traffic and landscape. We advise that all supporting technical information (desk-based assessments, geophysical surveys, evaluation and post-excavation reports etc.) are included as appendices.

We do however broadly support the approach taken in Chapter 6.9 (Historic Environment) and in general, the mitigation strategy appears to be sensible and appropriate in relation to both the on- and off-shore (marine) historic environment. The WSI and reporting protocol that is to be developed, will address this issue, but

[1] A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.

additional detail will be required in terms of what this specifically entails. We have set out some additional comments below.

Historic England Comments

Chapter 3.2.6 – HE has as also commented on this application to ESC

Chapter 3.3.2 – 6 - We note changes the outlined here, including new permanent elements, changes and new additions to the temporary development. Please also see our comments on the last PEIR stage in relation to on and -offsite works

Chapter 6.9.3 – We are pleased to see that the applicants have taken previous comments on board regarding assessment matrices and will provide a non-technical narrative argument to support the assessments.

Chapter 6.9.12 and 6.9.13 – We note this summarises the survey and assessment works that will be carried out, building on assessments carried out to support the 2014 Scoping Report. It is stated that the geophysics and evaluation trenching work will be undertaken in accordance with the WSI that was previously agreed. We would appreciate it if the applicant can ensure the DBA, WSI and baseline documents are appended to the main ES for reference.

A number of guidance documents were taken into account when the assessment methodology was defined (summarised in 6.9.16) We would recommend that the methodology should also make reference to the following guidance documents:

- Schmidt et al. (2016) EAC Guidelines for the use of Geophysics in Archaeology (http://old.european-archaeological-council.org/files/eac_guidelines_2_final.pdf).
- Historic England (2011) Environmental Archaeology (https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/)
- Historic England (2015) Geoarchaeology (https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/)

Chapter 6.14 - The Coastal Geomorphology and Hydrodynamics chapter discusses issues that may be of relevance to any heritage located in the coastal or nearshore areas. Any changes to coastal processes can have either positive or negative impacts on any heritage located in these areas, eroding/exposing or covering buried remains, or potentially contributing to the damage or risks facing any standing remains. We would therefore recommend that Cultural Heritage is included in the

discussions of potential impacts and included in the relevant heritage chapters in subsequent documents (Section 6.14.34).

If you have any queries about any of the above, or would like to discuss anything further, please contact me

Yours sincerely,

Will Fletcher
Inspector of Ancient Monuments
will.fletcher@HistoricEngland.org.uk

our ref
your ref EN010012-000670
please ask for Lisa Evans
direct dial 01473 432915
email lisa.evans@ipswich.gov.uk

IPSWICH
BOROUGH COUNCIL

The Planning Inspectorate
Major Casework Directive
Temple Quay House
2 The Square
Bristol
BS1 6PN

Grafton House
15-17 Russell Road
Ipswich Suffolk
IP1 2DE

www.ipswich.gov.uk

20th June 2019

Dear Gail Boyle

APPLICATION FOR SCOPINION OPINION – REFERENCE EN10012-00670

PROPOSAL: APPLICATION BY EDF ENERGY FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE SIZEWELL C NUCLEAR POWER STATION

Thank you for providing Ipswich Borough Council with the opportunity to comment on the Scoping Opinion submitted for the intended submission of an Environmental Statement in relation to the proposed development of Sizewell C Nuclear Power Station.

Ipswich Borough Council consider it appropriate to defer to others on the extent and methodologies for each of the environmental topics as these are more appropriately placed to respond. However Ipswich Borough Council would wish for the following matters to be considered and included within the formal scoping opinion.

Overarching Comments:
• The scope of the Environmental Statement needs to extend the study area to include Ipswich. The majority of the chapter topics set out in the scoping report exclude Ipswich as a study area. However the nature and scale of the proposed development has the potential for significant adverse impacts both alone and in combination with other developments upon Ipswich during the construction and operational phases of development and these should be fully assessed within the Environmental Statement. • The PEI has failed to include or have regard to the planned Ipswich Garden Suburb in the assessment of the impacts of the development alone or in the

	combination effects. Ipswich Garden Suburb is a strategically planned urban extension to the north of Ipswich of 3,500 dwellings with supporting infrastructure and is an allocation within the adopted Ipswich Local Plan. The Environmental Statement should have full regard to this allocated site which would be developed during the construction and operation of the proposed development.

Ipswich Borough Council also has specific comments on the following chapter topics:

Transport	• The scope of study area should be extended to include Ipswich. • The ES should fully assess the impacts of all vehicular movements from the construction and operational phases of the development (HGVs, LGVs, Buses, Cars) upon Ipswich's road network, including junction capacity and driver delay and the effects that this will have upon air quality. • The ES should fully assess the routes for LGVs, which currently are unknown and uncontrolled and could have a significant adverse impact upon traffic and air quality within Ipswich. • The ES should fully assess the impacts of the diversion strategy for HGVs and LGVs, should the Orwell Bridge be closed at any time and for any reason, with regard to the impact upon Ipswich road network. It is unclear what the contingency routing of HGVs would be if the Orwell Bridge were to be closed. • The ES should include any necessary mitigation for adverse impacts upon Ipswich's road network. • The ES, notwithstanding whether it is the rail or road strategy, must fully assess the traffic impact of the development having full regard to IBC's Strategic Housing allocation of 3,500 dwellings on the Ipswich Garden Suburb (IGS) and other planned development within the 2017 adopted Local Plan. The construction of the IGS will be alongside the construction of Sizewell C and it is unlikely that there will be a northern relief road available for use. This large strategic site has not been considered as part of the PEI. • It has not been identified where materials will be sourced from and as such the route for the movement of vehicles carrying materials in unknown. The ES must fully assess the impact from the movement of materials as, in particular full regard must be had to the use of the Felixstowe Line where parts are only single track. If Rail Led Strategy:- • The proposed permanent closure of the at grade pedestrian crossing at Westerfield and diversion of the existing footpath to Westerfield Road to enable the crossing of the line at Westerfield level crossing (vehicular) must be fully assessed

	having specific regard to the impact upon the Ipswich Garden Suburb (see below comment). • Ipswich Garden Suburb is a policy allocation for up to 3,500 dwellings in Ipswich. The allocation site is located either side of the East Suffolk railway line which runs through Westerfield. As part of the infrastructure requirements for the housing allocation a cycle and pedestrian bridge has been proposed to replace the at grade public footpath over the railway line. Ipswich Garden Suburb is intended to be highly sustainable and includes a number of services and facilities within the allocation to limit external car journeys. Such provision includes primary schools, a secondary school, a Country Park and retail. As such, there is a heavy emphasis on promoting access by pedestrian /cycle users through the site, which includes providing safe routes over the railway line via this pedestrian/cycle bridge. In addition, the close proximity of Westerfield Railway station to IGS provides further opportunities for sustainable travel by residents which needs to be promoted. Easy and direct Access to the station by residents is therefore of key importance. • Currently 133 trains per day passing through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion and Nacton Loop project – the total additional movements on this part of the line in the future could be substantial. The implications of additional trains on this part of line upon the IGS must be fully considered on the basis of:- ▪ Traffic – The impacts of more frequent and/or longer level crossing closures on traffic delays and congestion on the local highway; ▪ Pedestrian / Cycle access – due to the diversion of the public footpath, more frequent closures of the level crossing, delays experienced by users of the PRoW and railway station and subsequent decrease in accessibility to Westerfield Station for IGS residents. ▪ Delays experienced by potential passengers trying to access Westerfield station as a result of more frequent and longer level crossing closures at Westerfield. ▪ Concerns with the suitability and quality of access which could be achieved by the proposed diversion routes. All diverted route options lead to Westerfield Road where the pavement area needs to be improved/widened to ensure safe access. There are safety implications for increased pedestrians/cyclists using the level crossing and potential conflict with traffic. ▪ All diversion routes include a link through the Network Rail compound south of the railway line. Consideration

	as to how safe, accessible routes will be achieved via this area of operational land. Road-led Strategy: • The ES must fully assess the impact of only having a Freight Management Facility to the east of the Orwell Bridge and not also a Freight Management Facility west of the Orwell Bridge. • To ensure the air quality in Ipswich is not affected IBC do not wish for any approved HGV route for Sizewell C to be diverted through Ipswich.
Air Quality	• The scope of the ES study area should be extended to include Ipswich. • Mitigation proposed to mitigate impacts such as low emission buses for commuter buses between Ipswich and the main development site. • The ES should fully assess the impact of the development in the construction and operational phases both alone and in combination upon Ipswich's air quality. • The ES must fully assess the impact of the development upon the air quality within Ipswich as a result of the increased traffic related emissions, which should include workers living in Ipswich commuting to the development and all forms of construction and workforce traffic (cars/LGVs/HGVs/Buses) and should also include any construction vehicles diverting through the town. This ES will need to consider and assess the impact upon the current declared AQMAs and whether the proposed development would create any further need for new AQMAs to be declared. • This assessment should include necessary mitigation such as low emission bus transfers for staff from Ipswich/Westerfield Railway Stations. • Currently 133 trains per day pass through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion / Nacton Loop– the total additional movements on this part of the line in the future could be substantial. The implications of additional trains on this part of line upon the air quality of the proposed residents air quality from the impact of additional trains and delayed traffic at level crossing.
Amenities	• The scope of the ES study area should include Ipswich with regard to the impact upon air quality. • Specific assessment of the impact upon the proposed development at the Ipswich Garden Suburb (3,500 dwellings) where the Felixstowe Railway line runs through and has potential to have significant affect upon amenities by reason of noise and disturbance.

	• Of a wider concern to IBC is the impact this would have upon existing and future residents of Ipswich as a result of the running of the additional freight trains outside of normal hours that could lead to adverse impacts on residential amenities by both noise and vibration given these would be run at unsociable hours.
Accommodation	• The ES should fully assess the impact of the development on Ipswich and the Ipswich housing market should be part of the Accommodation Strategy both in terms of the impact on the Ipswich rental market, and the likely need for workers who may be living in Ipswich. • The ES should fully assess the potential adverse impacts upon Ipswich, including the impact on the local private sector rental market. The rental sector is already in high demand and prices are the highest in the area when measured against local incomes. With an unknown level of workforce the ES needs to consider the level of demand and the impact upon Ipswich's private sector rental market and existing and future residents should landlord's choose to offer their accommodation to the Sizewell C workforce at a guaranteed higher rent. • The ES should expand upon the estimated level of mitigation should this forecast be underestimated.
Employment	• The ES study area should extend to include Ipswich. • The ES should fully assess the impact the development during the construction and operational phase on Ipswich with the potential for supply chain opportunities, training and jobs.
Alternatives:	• The ES should fully justify why the marine led transport strategy was not discounted for the transport strategy. • The ES should fully justify why either the road-led or rail led strategy was not discounted for the transport strategy.
Cumulative development	▪ The ES should have full regard to the Ipswich Garden Suburb in the cumulative impacts of the development.

If you require any further information, please feel free to contact me.

Yours sincerely

[redacted]

Carlos Hone MRTPI
Planning and Development - Operations Manager

Ipswich Borough Council

The Planning Inspectorate
Major Casework Directorate
For the attention of Gail Boyle
Temple Quay House
2 The Square
Bristol, BS1 6PN

4th June 2019

Your Ref: EN010012-000670

Dear Ms Boyle,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

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

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

In respect to the above matter, Kelsale cum Carlton Parish Council are concerned that the utilisation of the "de-trunked" A12 (from both the A14 J58 in the South and from an indeterminate point south of Lowestoft) forms the major route for traffic involved in the construction, operation and subsequent decommissioning of the Sizewell C Nuclear Power Station.

For the purposes of clarity, Kelsale cum Carlton Parish Council draws the attention of The Planning Inspectorate to the high level of single carriageway comprising the A12 north of Woodbridge, interspersed with occasional and generally short lengths of dual carriageway.

In addition, the Parish Council draws the attention of The Planning Inspectorate to the type of roads intersecting the A12 and the potential consequences of these largely un-kerbed roads being subject to increased traffic and most particularly, diverted HGV traffic.

In many cases intersecting roads quickly migrate into a network of narrow, or single-track roads, only negotiable by utilising "passing points".

It may also be useful to understand that many of these lesser roads, as well as being used regularly by East Suffolk residents, are also widely utilised by holidaymakers, farmers and for a wide range of leisure pursuits (i.e. Horse riding, cycling, walking, etc.).

However, within the Pre-planning Consultation(s) (including the PEI), there is little or no consideration of the fundamental environmental and ecological impacts that the substantial amount of generated SZC traffic will have on the A12 and the adjoining road networks.

Therefore, Kelsale cum Carlton Parish Council consider it imperative that this significant omission is rectified.

In that connection, Kelsale cum Carlton Parish Council seek the opportunity afforded by the Scoping Opinion to emphasise the importance of full and exhaustive analysis of potential environmental and ecological impacts on the;

- A12 per se
- adjoining minor roads
- villages, communities and settlements alongside
- A12 roadside and intermediate landscape (i.e. litter, debris, load losses, tyre losses, etc.)
- flora
- fauna
- habitats
- roadside and mid-range nature reserves
- protected species
- water courses
- air quality
- heritage assets and historic environments
- enjoyment and amenity offered by the route to residents, visitors and businesses in the East Suffolk area
- Public Rights of Way, Bridleways, etc.
- A12 immediate and intermediate arable land and crops (dependent on propagation patterns)
- A12 immediate and intermediate horticultural land (dependent on propagation patterns)
- A12 immediate and intermediate livestock (dependent on propagation patterns)
- A12 immediate and intermediate recreational open spaces (dependent on propagation patterns)
- A12 immediate and intermediate open-air leisure businesses (dependent on propagation patterns)
- aquifers and similar
- A12 immediate and intermediate rivers, streams and ponds (dependent on propagation patterns and flow threats)

In particular Kelsale cum Carlton are concerned with the identification, quantification and proposals for the mitigation of adverse impacts arising from (but not exclusively):

- Air pollution
- Traffic Noise
- Extended hours of 'heavy traffic flows'
- The increased HGV and LGV components in daily traffic flows
- Particulates, dust and other airborne materials
- The route topology and the changeable propagation patterns arising
- Surface water behaviour…
- …run-off composition, treatment and in-flow management…
- …alongside the component ditches, gulley's, ducts, etc.
- Vehicle fuels and load seepage, loss, etc. (individually and in combination)

As a Parish split by the A12, Kelsale cum Carlton Parish Council are very concerned about the mental and physical health and wellbeing of residents and visitors to the Parish.

With a significant elderly population, a Primary School serving a wide area and specialised housing for vulnerable people, it is incumbent on the Parish Council to seek appropriate safeguards during this period of potentially damaging levels of additional traffic on and around the A12.

With very limited public transport available, residents of Kelsale cum Carlton are very dependent on either walking, cycling or private cars as the primary methods of conducting their daily lives. As a consequence, adverse impacts on the A12 and the surrounding road network must be fully understood to enable residents to plan accordingly. The Pre-planning Consultation(s) and PEI have not enabled this.

Kelsale cum Carlton Parish Council also attach their formal response to the SZC Stage 3 Pre-Planning Consultation and draw the attention of The Planning Inspectorate to:

i] the specific environmental concerns arising from the EDF Energy proposal for a Sizewell Link on the northern boundary of Kelsale cum Carlton, and the treatment they have been given in the PEI.

ii] the generic environmental and ecological impacts identified by Kelsale cum Carlton Parish Council throughout the response.

iii] the A12 adjacent and close proximity environmental and ecological assets in and around Kelsale cum Carlton (i.e. Simpsons Fromus Reserve, Tiggins Lane, North Green Roadside Reserve, etc.) and the increasing number of listed species of Flora & Fauna in the area (i.e. Sandy Stiltball, Great Crested Newts, Turtle Doves, Nightingales, Cuckoo, assorted bat species, Brown Hares etc.) Please note there is a new Roadside nature reserve numbered site 209 at Tiggins Lane which is near site 102

iv] The centre of Kelsale has been designated a Conservation Area from Autumn 2018 and it is important to ensure that adverse impacts resulting from the proposed development on the setting of the conservation area are fully assessed by EDF Energy.

v] The mix of potential Energy Projects on this coast in addition to an ambitious house building program that must put an enormous strain on the water supply in one of the driest regions of the country.

The Planning Inspectorate may also wish to visit other Kelsale cum Carlton Parish Council documents pertaining to the SZC proposals, available under the 'Consultations' tab on the Parish Council website **KcC Parish Website**.

The Parish Council would also draw the attention of The Planning Inspectorate to the 2014 Scoping Opinion response, jointly made by Suffolk County Council and the then, Suffolk Coastal District Council. For the sake of completeness Kelsale cum Carlton Parish Council attach a copy.

In concluding, Kelsale cum Carlton Parish Council thank The Planning Inspectorate for their consideration of these matters and look forward to offering further assistance and information should it be required.

Yours Sincerely

Councillor Edwina Galloway – Vice Chair & SZC Portfolio, Kelsale cum Carlton Parish Council

Attached (2): Joint SCC & SCDC 2014 Scoping Opinion response
KcC PC Stage 3 Consultation response

Executive Summary

Introduction

This document summarises the conclusions reached by Kelsale cum Carlton Parish Council following the publication of the Sizewell C Stage 3 Pre-application Consultation on the 4th January 2019.

In formulating its response, Kelsale cum Carlton Parish Council has sought the views of residents by way of a Public Meeting and a door to door delivery of a quantitative and qualitative response mechanism.

The published EDF Energy documentation (Volume 1 – Development Proposal, Volumes 2a & 2b of the Preliminary Environmental Information and Volume 3 Preliminary Environmental Information Figures) has been reviewed during the compilation of Kelsale cum Carlton Parish Council's response.

The attached document 'Kelsale cum Carlton Parish Council's Detailed Response to Sizewell C Stage 3 Pre-Application Consultation' is structured to mirror EDF Energy's Volume 1 – Development Proposal and contains detailed comments, observations, evidence where available and ideas for EDF Energy's consideration. It is augmented by responses to EDF Energy's accompanying PEI where appropriate.

In order to ease navigation of a complex response to EDF Energy's documents, numbering remains the same, with PEI paragraphs prefixed by 'PEI'.

Text in black is that of EDF, whilst Kelsale cum Carlton Parish Council's [KcCPC] responses are made in blue.

Kelsale cum Carlton Parish Council has undertaken this response and all of its consultation with residents on the basis that government policy has given approval for EDF Energy to consult on the construction of Sizewell C with a view to EDF Energy making an application for a Development Consent Order. Consequently, comments largely relate to the 'how' delivery will be made and not the underpinning rational for Sizewell C or Nuclear Power.

Conclusions

In coming to its conclusions Kelsale cum Carlton Parish Council has; tried to remain objective, listened to the variety of views expressed by residents, considered the broad picture emerging of East Suffolk over the next 10 to 20 years and the potential needs and demands of local businesses, residents, visitors and the short to medium term environmental issues likely to be impacting them.

As a consequence, Kelsale cum Carlton have concluded that:

A] The Council is unable to support the Road-Led proposal being brought forward by EDF Energy at Stage 3

The principal considerations in coming to this decision are threefold:

- Firstly, it is the view of the Council that even on a standalone basis, the demands of the Road-Led proposal place too heavy a reliance on HGV traffic moving the bulk of the required 10.7 million tonnes of construction materials along the A12. A complex road architecture that the Council believes, even with proposed works by EDF Energy, would not safely accommodate EDF Energy construction traffic and the other 'normal' demands being made on it by; existing business, residents and visitors.

- Second, the Council believes that the safety and well-being of many Kelsale cum Carlton residents would be severely compromised in the conduct of their day to day lives, as a direct result of the forecast traffic levels on the A12 (particularly HGV, bus and Light Goods Vehicles). Moreover, the Council believes that those residents in close proximity to the A12 may be exposed to significantly higher levels of air pollution resulting from an intensification of traffic and particularly those powered by diesel engines.

- Finally, the Council is aware of an increasing number of additional major influences impacting, or likely to impact the A12 in a similar timeframe as the proposed Sizewell C construction. The Council have formed the view that the cumulative impact on the A12, either confined to the south of Woodbridge or along a greater part of its length is unsustainable and represents a real threat to the ability of East Suffolk residents, businesses and visitors to undertake relatively simple activities without significant preparation.

B] Whilst the Council would like to be able to give full support to the Rail-Led proposal being brought forward by EDF Energy at Stage 3, it is unable to give it unqualified support because of three key considerations:

- Firstly, it is the view of the Council that, similarly to the Road-Led proposal, the demands on the A12 remain too heavy. As mentioned previously, it is a complex road architecture and the Council remain unconvinced even with proposed works by EDF Energy, that it would safely accommodate EDF Energy construction traffic and the other 'normal' demands being made on it by; existing business, residents and visitors. In coming to this conclusion the Council considered the number of HGV and Bus movements and the observed behaviour of mixed traffic accelerating and decelerating, when slower moving vehicles are in the majority.

- Second, once again the Council were concerned that the safety and well-being of many Kelsale cum Carlton residents would be severely compromised in the conduct of their day to day lives, as a direct result of the forecast traffic levels on the A12 (particularly HGV, bus and Light Goods Vehicles). Moreover, they remained concerned that those residents in close proximity to the A12 would be exposed to significantly higher levels of air pollution resulting from an intensification of traffic and particularly those powered by diesel engines.

- Third, the Council considered the rail component as relatively unambitious and subject to a lot of qualification, both by EDF Energy and seemingly by EDF Energy on behalf of Network Rail. In coming to this conclusion, the Council were aware that rail infrastructure is subject to a limited supply-side capability and therefore can be more difficult to determine in terms of design, integration and deployment. However, the Council were minded that a more ambitious scheme might; focus minds, attract a higher degree of interest, expand lateral thinking and potentially leverage a greater degree of support.

C] In any circumstance, the Council was unable to do anything other than oppose the EDF Energy proposal brought forward at Stage 3 for the development of a Sizewell Link road:

The principal considerations in coming to this decision are twofold:

- Firstly, it is the view of the Council that, the provision of a Sizewell Link road at the northern end of EDF Energy's A12 route does nothing to alter the fundamentally unsound nature of the A12 route, all the way from a congested A14 J58 in the south, through the busy Foxhall roundabout and onto the congestion in the Martlesham and Woodbridge areas, before approaching the tricky single carriageway stretches at Marlesford and Little Glenham. The Council also noted that the

proposed highway improvements would not be on-stream until well into the 'early years', 2024 in the case of the two village bypass.

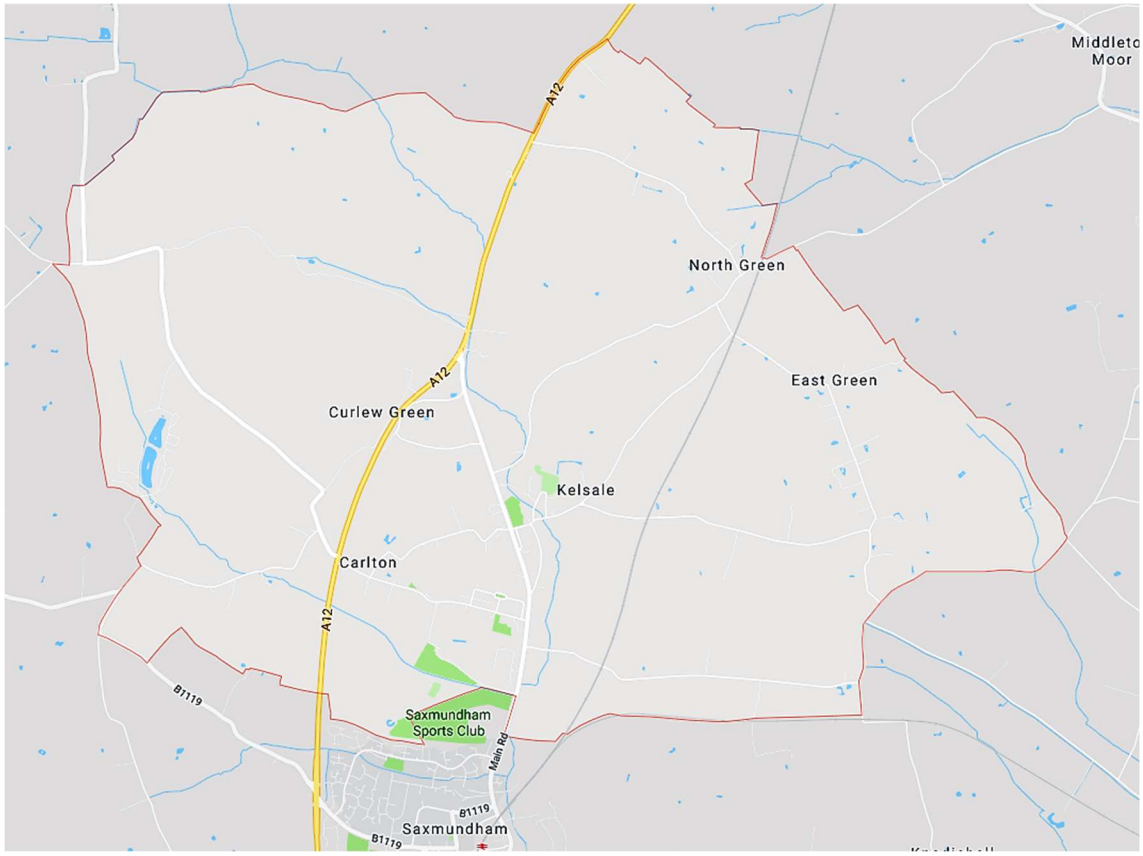
- Second, the routing of a Sizewell Link road from a point on the A12 at the northern border of Kelsale cum Carlton is an ecological disaster for both Kelsale cum Carlton and the neighbouring parishes. Its construction involves the loss of an estimated 120 hectares of 'best and most versatile' agricultural land, and ponds, trees, hedgerows and ground habitats offering shelter to a wide range of birds, mammals, reptiles, insects and flora. It also disrupts the historic migratory route of Red Deer from the Fromus Reserve (to the west of the A12) to the rutting grounds of the Coastal Heathlands AONB.

The Council also reviewed the other routes explored by EDF Energy that crossed the Kelsale cum Carlton parish and found that they too did nothing to address the fundamental issue of the EDF Energy proposed A12 route (as discussed above). Moreover, the Council noted the alternative routes were either adjacent to or partially within the recently designated Kelsale Village Conservation Area, impacted a newly designated Roadside Nature Reserve and would also impact habitats akin to those comprising the Sizewell Link road route being brought forward by EDF Energy at Stage 3.

D] As a consequence, Kelsale cum Carlton have also concluded that they are:

- opposed to all further link road options (current or new) until EDF Energy objectively review the sustainability of any proposals, where the majority of the route is dependent on a largely unmodified A12 and is host to the multiplicity of projects currently under consideration, or already approved. Moreover, Kelsale cum Carlton would expect EDF Energy's modelling to fully reflect the burden of tourist traffic.

In concluding, KcCPC would like to draw EDF Energy's attention to the response from the Department of Transport **(Appendix H)** in respect to the exclusion of weekend and holiday periods from traffic modelling of schemes in 'Holiday Centres'. In particular KcCPC note "However, it is possible that the business case for a scheme could depend heavily on seasonal impacts, and in this instance it would be good practice for analysts to seek agreement with assessors about the appropriate analytical approach at an early stage, typically through an Appraisal Specification Report (ASR) in line with the TAG SRO Unit Section 1.2.



"Had I the heavens' embroidered cloths
Enwrought with golden and silver light,
The Blue and the dim and the dark cloths
Of night and light and the half light,
I would spread the cloths under your feet;
But I being poor, have only my dreams;
I have spread my dreams under your feet;
Tread softly because you tread on my dreams"

WB Yeats (1830-1894)

Introduction

About Kelsale cum Carlton

Kelsale cum Carlton [KcC] is one of the largest (by area) Parishes in the Suffolk Coastal area and comprises a combined Parish of two village entities (Kelsale and Carlton), three historic Greens (Curlew, North and East) and is bisected by the A12, with the bulk of residents living to the east of it.

The Parish also has the northern tail of the historic A12 route, providing many Saxmundham residents and businesses direct access to and from the A12 at Dorley's Corner, a small community directly alongside the A12.

The KcC Parish comprises nearly 500 households, 32 listed buildings (Graded 1*, 2* & 2), a small light industrial estate, a number of places of worship, a listed Village Hall, a Social Club, Public House, several large farms, a number of smaller farms and agricultural businesses dependent on tourism, all located in a substantial agricultural land area surrounding the village centres.

It is home to; the Fromus Nature Reserve (to the west of the A12), three roadside nature reserves (at Tiggins Lane, Fordley Road and Carlton Green - west of the A12), a private nature reserve (Rydall Mount, Tiggins Lane), several flora species of 'national interest', a wide range of domestic and migratory birds, a migratory Red Deer population and a multiplicity of Great Crested Newt colonies. KcC also has two County Wildlife Citations with a third sitting on its boundary.

The Parish has a considerable historic inheritance including; several medieval moated areas, an Ancient Woodland, a richness of archaeological interest and of course the contentious view held by some that, East Green may have been; the site of, adjacent to or on the road toward Sitomagus, all of which have yet to be substantiated.

More recently, in 2018 Kelsale Village became the latest Conservation Area to be designated in the Suffolk Coastal area, in recognition of both its built environment with buildings from 'Nationally Important' architects and its special setting in an open and unspoilt agricultural landscape.

KcC also benefits from a non-designated heritage asset in the form of the historic Carlton Parkland that sits astride the old A12 and adjacent to Clayhills Road at its northern margin.

KcC's neighbouring parishes comprise; Theberton to the east, Middleton and Yoxford to the north, Saxmundham to the south, Rendham to the west, along with other close neighbours; Knodishall, Leiston and Sternfield across predominantly agricultural fields.

In general terms the network of roads and lanes servicing KcC residents and businesses (excepting the A12 and Main Road) are less than 4 metres wide, with many effectively operating as single carriageway lanes. Those where two way 'mixed traffic' is possible (along part or all of their length) are very limited and largely have either complicating factors (i.e. Kelsale Primary School, weak or weight limited bridges, etc.) or facilitative features (i.e. passing spaces).

It should be noted that the network of lanes comprising the greater KcC area are regularly used by; horseriders, runners, walkers, dog walkers, cyclists, game shoots and agricultural vehicle – small and large, they are often hedged to both sides (some sunk), are largely unpaved, have soft verges and deep run-off gulleys and are often subject to field run-off in west weather.

KcC is centrally placed in an area identified as having 'severe' water issues. As a consequence KcCPC is concerned that the additional water required to construct Sizewell C may irrevocably damage the local aquifers, water abstraction sites and local supply continuity.

About Kelsale cum Carlton Parish Council's Response

Kelsale cum Carlton Parish Council [KcCPC] has taken the opportunity to review the proposals contained within the four volumes of the Stage 3 Pre-Application Consultation produced by EDF Energy.

Volume 1 – Development Proposals (418 pages)

Volume 2a – Preliminary Environmental Information (374 pages)

Volume 2b – Preliminary Environmental Information (314 pages)

Volume 3 – Preliminary Environmental Information Figures (167 pages)

KcCPC has tried to frame responses to all of the elements of the proposal where they have either a direct impact on the residents of the Parish, or indirect and/or unforeseen consequences of a specific proposal that may impact the Parish detrimentally or beneficially.

Within the limited time available, KcCPC has tried to solicit the views of as many of residents as possible through a Public Meeting, a door-to-door delivered quantitative and qualitative questionnaire alongside face-to-face dialogue.

Where KcCPC (and/or the Parishes' residents) are not adequately equipped with; expertise, knowledge, tools, adequate time or an understanding of a specific topic, KcCPC defer to the expressed views of fellow Parish Councils, Town Councils, expert bodies and/or impacted residents and businesses.

Where a paragraph is 'noted', KcCPC have reviewed the content and concluded it does not require comment.

Readers should note that - KcCPC reserve the right to alter its position in regard to the views expressed in this response, if as a consequence of; ongoing work, the emergence of material elsewhere or other matters of significance howsoever arising, inform KcCPC's position at the time or writing, more fully.

In order to ease navigation of a complex response to EDF Energy's documents, numbering remains the same, with PEI paragraphs prefixed by 'PEI'.

Text in black is that of EDF or in a limited number of cases, a third party, whilst Kelsale cum Carlton Parish Council's [KcCPC] responses are made in blue.

Kelsale cum Carlton Parish Council has undertaken this response and all of its consultation with residents on the basis that government policy has given approval for EDF Energy to consult on the construction of Sizewell C with a view to EDF Energy making an application for a Development Consent Order. Consequently, comments largely relate to the 'how' delivery will be made and not the underpinning rationale for Sizewell C or Nuclear Power.

CONTENTS

KcCPC's response to EDF Energy's Stage 3 Volume 1	– Section 1 Introduction	4-7
	– Section 2 Project Overview	8-15
	– Section 3 Planning Context	16-19
	– Section 4 Socio-economics	20-39
	– Section 5 Transport Strategy	40-67
	– Section 6 Traffic Modelling	68-94
	– Section 7 Main Development Site	95-114
	– Section 8 Rail	115-120
	– Section 9 Level Crossings	121-128
	– Section 10 Sizewell Link Road	129-150
	– Section 11 Theberton Bypass	151-156
	– Section 12 Two Village Bypass	157-161
	– Section 13 Northern Park and Ride	162-165
	– Section 14 Southern Park and Ride	166-170
	– Section 15 Freight Management Facilities	171-176
	– Section 16 Yoxford Roundabout	177-179
	– Section 17 Highway Improvements, Cycling & PRoW	180-187

1. Introduction (Volume 1, Pages 2 to 11)

1.1 Introduction

1.1.1 KcCPC note the Joint Venture between EDF Energy and China General Nuclear Power Corporation through NNB Generation Company (SZC) Limited (Reg. No. 09284825), incorporated in London on 28th October 2014.

KcCPC also note that further shareholder investment is being sought to finance and construct Sizewell C, with unnamed UK Pension Funds currently in discussions.

It is noted that NNB Generation Company (SZC) Limited is referred to as **EDF Energy** throughout the consultation documentation.

1.1.2 Noted

1.1.3 KcCPC note the intent not to undertake any further consultation prior to deciding whether to take forward proposals in the form of an application for a Development Consent Order.

KcCPC regret that this appears to be the intention of EDF Energy, as it believes that some of the proposals coming forward in this Stage 3 Consultation, are radically different to those in the preceding Stages (1 and 2) and are in some instances either in part or fully; unsubstantiated, incomplete, ill defined, unproven or unsound.

Consequently, KcCPC believes it likely that some proposals directly impacting Parish residents may only be seen in substantive form at the point an application for a Development Consent Order is made to the Planning Inspectorate, leaving Representations to the Planning Inspectorate as the only forum for raising concerns.

1.1.4 KcCPC note the restatement of the EDF Energy vision (from Stage 2).

However, in light of proposals coming forward in Stage 3 (and noting the respect shown for the marine environment), KcCPC wonder under what definition of "sustainability" the development, operation and decommissioning of Sizewell C is being undertaken under.

Can it possibly be:

"A process of change in which the exploitation of resources, the direction of investments, the orientation of technological development and institutional change <u>are all in harmony and enhance both current and future potential</u> to meet human needs and aspirations"
The World Commission on Environment and Development

1.1.5 KcCPC notes the contents of this paragraph and in particular:

"…we have continued to collect environmental information to identify any <u>significant</u> environmental effects that may arise in connection with the project. In doing so, <u>we have started</u> to consider how these effects may be addressed…<u>and changes to our transport and socio-economic strategies</u>."

KcCPC expect any application for a Development Consent Order to reflect this paragraph, but also a broader consideration of environmental effects, with "significant" also being applied to those within the local social context, and not just Public Right of Ways as it seems to be.

1.1.6 The contents of this paragraph are noted.

KcCPC also note that consideration of the origin and transport of construction materials is absent, prior to marshalling at the Freight Management Facility. This omission, in the context of residents journeying beyond the immediacy of the East Suffolk coastal area, seems to imply that - wider disruption on the A12 South of Ipswich and the A14 West of Ipswich is not being planned for within the project.

1.2 Key updates and changes since the stage 2 consultation

a) Main development site

1.2.1 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

b) Transport strategy for movement of construction materials

1.2.2 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.3 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

c) Changes to park and ride facilities

1.2.4 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

d) Community and economic issues

1.2.5 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.6 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.7 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

e) Additional assessment of impact of construction workforce

1.2.8 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

f) Movement of people

1.2.9 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.3 Policy context update

1.3.1 The contents of this paragraph are noted.

1.3.2 The contents of this paragraph are noted.

1.3.3 The contents of this paragraph are noted.

1.3.4 The contents of this paragraph are noted

1.3.5 The contents of this paragraph are noted

1.3.6 The contents of this paragraph are noted

1.3.7 The contents of this paragraph are noted

1.4 Structure of this document

1.4.1 The contents of this paragraph are noted.

1.4.2 The contents of this paragraph are noted.

1.4.3 The contents of this paragraph are noted.

1.4.4 The contents of this paragraph and Table 1.1 are noted.

1.5 Approach to consultation

1.5.1 The contents of this paragraph are noted.

KcCPC also note that *"…we have committed to undertaking a minimum of three formal stages of pre-application consultation prior to submitting our application for development consent…"* and in regard to comments made previously at 1.1.3, look forward to EDF Energy **reflecting on the improvement to public interest** served by an additional consultation, prior to making application for a Development Consent Order.

1.5.2 The contents of this paragraph are noted.

1.5.3 The contents of this paragraph are noted.

1.5.4 The contents of this paragraph are noted.

1.5.5 The contents of this paragraph are noted.

1.5.6 The contents of this paragraph are noted.

1.5.7 The contents of this paragraph are noted.

1.6 Approach to acquisition of land

1.6.1 The contents of this paragraph are noted.

KcCPC note that:

"…However, in the event that negotiations with some land owners are unsuccessful, EDF Energy would propose to acquire land via compulsory purchase, and will seek the necessary powers in the application for development consent."

KcCPC look forward to EDF Energy publishing transparent, control processes that ensure the integrity, equitability and consideration that will be extended to landowners in all instances of the exercise of these privileged powers.

1.7 Responding to this consultation

a) Finding out more

1.7.1 KcCPC represents a broad range of residents, many of whom have; mobility issues, restricted access to the very limited public transport options, no access and/or understanding of the internet, restricted visitors or a support network.

As a consequence, KcCPC sought access to printed Consultation materials, to enable some of these villagers' access to the consultation documents at Kelsale Village Hall, thereby reducing the number of Parish residents precluded from participating in the consultation.

KcCPC would like EDF Energy and the Planning Inspectorate to note that this request was initially refused and it was only through the persistence of the Parish Councillor with the Sizewell C portfolio responsibility, that EDF Energy did eventually capitulate, making two sets of documentation available.

KcCPC believes their experience is a salutary lesson to anybody undertaking public consultations, particularly in localities where access to transport, technology and personal support networks are limited.

1.7.2 The contents of this paragraph are noted.

1.7.3 KcCPC is gravely disappointed that despite proposals coming forward in the Stage 3 Consultation, directly impacting a significant group of Kelsale cum Carlton residents and indirectly many more – EDF energy failed to schedule a "public exhibition" in Kelsale cum Carlton, unlike many other directly impacted Parishes.

Moreover, rather than naming Kelsale cum Carlton as a directly impacted Parish, the EDF Stage 3 documentation largely refers to the impacted area as "…South of Yoxford…".

Given the preceding comments (1.7.1 above), KcCPC would like to point out to both EDF Energy and the Planning Inspectorate that KcCPC believes these instances are indicative of broader issues relating to; a lack of local knowledge and are also symptomatic of the undue haste with which some of these proposals have been bought forward.

1.7.4 The contents of this paragraph are noted.

See the preceding comments (1.7.1 and 1.7.3 above)

b) Responding to this consultation

1.7.5 The contents of this paragraph are noted.

See the preceding comments (1.7.1, 1.7.3 & 1.7.4 above)

2. **Project Overview** (Volume 1, Pages 12 to 36)

2.1 Introduction

2.1.1 KcCPC note the content of the paragraph (including Figure 2.1) and defer to third parties with the requisite knowledge and expertise to critique the technical assertions made within.

2.1.2 KcCPC note the content of the paragraph

2.1.3 KcCPC note the content of the paragraph

2.1.4 KcCPC note the content of the paragraph

KcCPC is disappointed that the marine-led strategy has been assessed as being weak, but at the same time is heartened that in referencing "…its impact on the marine environment and related potential to impact the project's construction programme and operational date.", EDF Energy appear willing to consider the primary drivers of the project in the round, especially when assessing the viability of a specific option.

In this case, emphasising the qualitative (environmental impact) and temporal aspects, rather than focusing (or placing undue weight) on the fiscal driver.

2.1.5 KcCPC note the two transport strategies being consulted on in Stage 3

2.1.6 KcCPC note the assertions made in the paragraph and will address each as they arise

2.1.7 KcCPC is disappointed that after a significant period of explorative work EDF Energy "…do not yet know with certainty that the rail-led strategy is deliverable, particularly within the timescale necessary to serve the project."

Moreover, KcCPC is surprised at the modest ambition of the outline rail-led strategy.

KcCPC note that EDF Energy "…are working with Network Rail to confirm the deliverability of the various improvements to rail infrastructure that would be necessary.", but are very disappointed at an implied "once and done" consultation approach, on such a critical option is outlined in the sentence "We wish at this stage also to receive feedback from this consultation on the implications of a rail-led strategy so that we can make a fully informed decision on which strategy to take forward into the application for development consent."

2.1.8 Whilst KcCPC notes and welcome EDF Energy testing the potential impact of an increased workforce on the main development site, KcCPC is shocked that EDF Energy felt it necessary to test a rise in excess of 40% above the "central estimate".

That said, recently reported step increases in workforce numbers at Hinkley Point C would seem to point to a systemic understating of base case estimates.

All of the impacts including those identified at 2.1.8, will be addressed as they arise.

2.1.9 KcCPC note the content of the paragraph and Figure 2.2

2.2 Main Development Site

2.2.1 KcCPC note the content of the paragraph and Figures 2.3, 2.4 & 2.5

2.2.2 KcCPC note the content of the paragraph

2.2.3 KcCPC note the content of the paragraph

2.3 Green Rail Route

1.7.6 KcCPC note the content of the paragraph and Figures 2.6 & 2.7

2.3.2 KcCPC note the content of the paragraph

2.3.3 KcCPC seek clarification on the role of rail transport post removal of the Green Rail Route and Land Reinstatement, specifically relating to the removal of hazardous waste (Sizewell A if required, B and C), serving outages (Sizewell B and C), etc.

2.3.4 KcCPC note the intention to remove the Green Rail Route and reinstate the farmland, etc. after construction completion.

2.3.6 KcCPC note the content of the paragraph

2.4 Other rail improvements and changes to level crossings

2.4.1 KcCPC note the content of the paragraph

a) Sizewell Halt or new rail siding

2.4.2 KcCPC note the intention of EDF Energy to commence delivery of construction materials to the main development site prior to completion of the Green Rail Route or the Sizewell Link (dependent on the chosen strategy).

KcCPC is concerned about the duration, intensity and pattern of construction material deliveries (and return journeys) to the main development site ahead of completion of the strategic infrastructure elements of either strategy. KcCPC seeks further details from EDF Energy.

KcCPC is further concerned about the absence of substantive underpinning controls and processes during what is likely to be a 'make do and mend' arrangement. KcCPC seeks further details from EDF Energy.

2.4.3 KcCPC note the intention of EDF Energy to deliver freight from Sizewell Halt to the main development site by HGV vehicles along Lovers Lane.

KcCPC is concerned at the potential volume and intensity of transfers along Lovers Lane, the loss of local amenity and the impact on those living at Sizewell Beach and thereabouts. KcCPC seeks further details from EDF Energy.

2.4.4 KcCPC note the intention of EDF Energy to deliver freight arriving at a new rail siding, adjacent to the existing branch line, to the main development site by HGV vehicles along Lovers Lane.

KcCPC is concerned at the potential volume and intensity of transfers along Lovers Lane, the loss of local amenity and the impact on those living at Sizewell Beach and thereabouts. KcCPC seeks further details from EDF Energy.

2.4.5 KcCPC note the requirement for the Green Rail Route, as neither Sizewell Halt or a new siding would be capable of peak period operating under a rail-led strategy.

KcCPC is concerned at the seemingly low level of ambition being attributed to a Rail-led strategy (i.e. Figure 2.2 "Up to 5 trains per day"). Whilst there may be very good reasons, these constraints are not immediately visible and it is unclear whether a full range of options have been tested rigorously enough (i.e. night trains, etc.). KcCPC seeks further details from EDF Energy.

2.4.6 KcCPC seek clarification on the role of rail transport post removal of the Overhead Conveyor or removal of the new siding (whichever is selected) specifically relating to the removal of hazardous waste (Sizewell A if required, B and C), serving outages (Sizewell B and C), etc. under normal operation, outages and maintenance.

b) Upgrades to the East Suffolk line and changes to level crossings

2.4.7 KcCPC note the content of the paragraph.

2.4.8 KcCPC note the content of the paragraph.
KcCPC is concerned at the seemingly low level of rail ambition being described under a Road-led strategy (ie. Figure 2.2 "Up to 2 trains per day"). Whilst there may be very good reasons, these constraints are not immediately visible and it is unclear whether a full range of options have been tested rigorously enough (i.e. night trains, etc.). KcCPC seeks further details from EDF Energy.

2.4.9 KcCPC note the content of the paragraph.

c) Saxmundham-Leiston branch line and changes to level crossings

2.4.10 KcCPC note the content of the paragraph.

2.5 Sizewell link road

2.5.1 KcCPC note the content of the paragraph and Figure 2.10

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.5.2 KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.5.3 KcCPC is concerned that EDF Energy envision the Sizewell Link remaining after the completion of the power station, as a "…lasting legacy…" of the project.

Perhaps EDF Energy should consult with the local Parish Councils and communities (as well as the statutory authorities) prior to determining whether retention is the preferred outcome.

Not to do so, might mean that what ostensibly is intended as a gesture of largesse, might be otherwise construed as a manifestation of; the projected and ongoing operational and decommissioning needs of EDF Energy, a requirement agreed between EDF Energy and the responsible local authority(ies), cost avoidance of reinstatement, or a combination of all of the foregoing and other considerations.

2.5.4 KcCPC note the content of the paragraph

2.6 Theberton bypass

2.6.1 KcCPC note the content of the paragraph and Figure 2.11

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.6.2 KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.6.3 KcCPC is concerned that EDF Energy envision the Sizewell Link remaining after the completion of the power station, as a "…lasting legacy…" of the project.

Perhaps EDF Energy should consult with the local Parish Councils and communities (as well as the statutory authorities) prior to determining whether retention is the preferred outcome.

Not to do so, might mean that what ostensibly is intended as a gesture of largesse, might be otherwise construed as a manifestation of; the projected and ongoing operational and decommissioning needs of EDF Energy, a requirement agreed between EDF Energy and the responsible local authority(ies), cost avoidance of reinstatement, or a combination of all of the foregoing and other considerations.

2.6.4 KcCPC note the content of the paragraph

2.7 Two Village bypass

2.7.1 KcCPC note the content of the paragraph and Figure 2.12

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.7.2 KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.7.3 KcCPC note the content of the paragraph

2.7.4 As various bypass options have been; campaigned for, consulted on and been the subject of extensive community discussion, KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

However, KcCPC note the loss of landscape, habitats and potentially severely detrimental impacts on some residential properties, flora and fauna.

Additionally, KcCPC note that the proposal injects two further deceleration/acceleration nodes into the planned route for 85% of road freight (under a road-led strategy), potentially reducing air quality further.

2.7.5 KcCPC note the content of the paragraph

2.8 Park and ride facilities

2.8.1 KcCPC note the content of the paragraph and Figure 2.12

2.8.2 KcCPC is concerned to note the increase in the number of vehicle parking spaces required at each Park & Ride location and wonder whether this reflects the increased likelihood of peak workforce numbers escalating, as is the case at Hinkley Point C.

KcCPC restate their previous assertion that EDF Energy should take a far more responsible approach to mitigating excessive vehicular movements toward the Suffolk Coastal area and the consequential impacts on communities throughout Suffolk, South Norfolk, East Cambridgeshire and North Essex.

In particular, EDF Energy should consider all traffic reduction measures, including:

- rigorously promoting and rewarding car sharing, aimed at achieving a construction phase average of 3 adults per vehicle 'at the gate'. Ideas include free Park & Ride parking for 3+ (or 75% occupation whichever is the greater), charging for all other vehicles.

- Reduction of Main Site Car Parking, with no access for vehicles with less than 3 adults (or 75% occupation).

- fitting employee and contractor vehicles with 'GPS transponder' technology to enable proactive route monitoring and policing, thereby reducing 'rat run' impacts and maverick behaviours (i.e. fly parking).

2.8.3 KcCPC welcome the early publication of EDF Energy's 'Park and Ride Restoration Plan' and understanding the extent of groundworks to be undertaken to ensure that both sites meet all necessary remediation standards (after their extended use as parking) to return the land to full agricultural use (i.e. spills, seepage, pollution and construction materials recovery, etc.).

a) Northern park and ride site

2.8.4 KcCPC note the content of the paragraph and Figure 2.13

KcCPC note that the proposal injects a further deceleration/acceleration node into the planned route for 15% of road freight (under a road-led strategy), potentially reducing localised air quality further.

2.8.5 KcCPC note the content of the paragraph

b) Southern park and ride site

2.8.4 KcCPC note the content of the paragraph and Figure 2.14

As various Southern Park and Ride options have been; consulted on and the subject of extensive community discussions, KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the revised EDF Energy approach.

2.9 Freight Management Facility

2.9.1 KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

2.9.2 KcCPC welcome the early publication of EDF Energy's 'Freight Management Facility Restoration Plan' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as an HGV parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

2.9.3 KcCPC note the content of the paragraph

a) Option 1: A12/A14 Seven Hills site

2.9.4 KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

Consequently, KcCPC is interested to understand the degree to which waiting times at all J58 entrances are forecast to increase as a consequence of EDF Energy construction HGV's approaching and departing the Freight Management Facility.

Access to the Freight Management Facility is assumed to be by:

- exiting the A14 from the west
- entering the circulating flow
- circulating the roundabout to the A1156 exit at the South
- entering Felixstowe Road to the left
- entering the Freight Management Facility to the left

Departure to the Sizewell C site is assumed to be by:

- exiting the Freight Management Facility turning right across the traffic flow
- entering the A1156 turning right across the traffic flow
- entering the roundabout traffic flow
- circulating the roundabout to the A12 exit at the North

KcCPC also note that access and egress via the Felixstowe Road and A1156 requires HGV traffic to pass and repass the entrance to the Seven Hills Crematorium.

As a consequence, KcCPC would seek reassurance from EDF Energy that (inbound and outbound) HGV drivers will be instructed to show due respect to the departed (and those attending) by easing access and egress for vehicles to/from the Seven Hills Crematorium.

KcCPC anticipate that; HGV deceleration into the roundabout, HGV queueing time, HGV circulation round the roundabout and HGV acceleration away up the A12 may have a significant and detrimental impact on air quality in and around the J58 area.

Any contradictory evidence from EDF Energy modelling of the impact would be welcomed and should be placed in the public domain, along with the modelling assumptions.

b) Option 2: Innocence Farm site

2.9.5 KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

Consequently, KcCPC is interested to understand the degree to which waiting times at impacted J58 entrances are forecast to increase as a consequence of EDF Energy construction HGV's departing the Freight Management Centre and proceeding west to access the A12 at J58.

Access to the Freight Management Facility is assumed to be by:

- exiting the A14 from the west
- entering Croft Lane/Innocence Lane
- entering the Freight Management Facility to the right crossing the traffic flow

Departure to the Sizewell C site is assumed to be by:

- exiting the Freight Management Facility turning left
- entering the A14 Eastbound
- proceeding approximately 1.6 miles to the Kirton Road roundabout
- entering the roundabout traffic flow
- circulating the roundabout to the A14 westbound exit
- proceeding on the A14 westbound to J58
- sliproad to J58 roundabout
- entering the roundabout traffic flow
- circulating the roundabout to the A12 exit at the North

KcCPC anticipate that collectively the HGV decelerate/accelerate behaviours and waiting times arising from these inbound and outbound patterns may have a significant and detrimental impact on air quality in and around the J58 area and East through to the Kirton roundabout.

Any contradictory evidence from EDF Energy modelling of the impact would be welcomed and should be placed in the public domain, along with the modelling assumptions.

2.10 Yoxford roundabout

2.10.1 KcCPC note the content of the paragraph and Figure 2.16

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, as an adjacent Parish, KcCPC remind EDF Energy and the Planning Inspectorate of the comments made at 2.5.1 and 2.5.2 (above), that will be developed along with other themes, further throughout the response, as appropriate.

2.10.2 KcCPC note the content of the paragraph

2.11 Highway improvements, cycling and rights of way

2.11.1 KcCPC is surprised at the superficiality of the identified works planned "…to mitigate the impact of Sizewell C traffic." irrespective of which strategy is advanced to the Planning Inspectorate.

KcCPC will develop and broaden its views throughout this response but are concerned that observed behaviours on the A12 and the surrounding road network, combined with behaviours evident in and round Hinkley Point C give rise to a wide range of easily predictable as well as less predictable consequences of the EDF Energy proposals.

2.11.2 KcCPC note the content of the paragraph

2.11.3 KcCPC note the content of the paragraph

3. Planning Context (Volume 1, Pages 37 to 43)

3.1 Introduction

3.1.1 KcCPC note the content of the paragraph

3.2 Planning Regime

3.2.1 KcCPC note the content of the paragraph

3.2.2 KcCPC note the content of the paragraph

3.3 Need for new nuclear development and Sizewell C

3.3.1 KcCPC note the content of the paragraph

3.3.2 KcCPC note the content of the paragraph

KcCPC specifically note the reference to NPS EN-1, developments in technology since publication and the continuing growth in low impact, low carbon, generating capabilities in UK, Europe and Worldwide.

3.3.3 KcCPC note the content of the paragraph

KcCPC specifically note the reference to a statement made in 2017 by Rt Hon Greg Clark MP and Secretary of State for Business, Energy and Industrial Strategy, as an exemplar of "Members of Parliament have confirmed the Government's ongoing commitment to new nuclear."

KcCPC is also cognisant of recent changes in the; geopolitical climate, the fortunes of economies worldwide, the uncertainties created by Britain's vote to exit the European Union, the changing financial fortunes of major World and European generators since publication of NPS EN-1 and more recently.

3.3.4 KcCPC note the content of the paragraph

KcCPC specifically note the reference to NPS EN-6, the recent events in Anglesey, Gloucestershire & Cumbria, along with the alleged cause(s).

3.3.5 KcCPC note the content of the paragraph

Additionally, KcCPC note the recent comment of Duncan Hawthorne (Chief Executive of Hitachi's Horizon) when referring to Anglesey, he said "the best site for nuclear development in the UK".

3.3.6 KcCPC note the content of the paragraph

KcCPC note the reference to "The annex also identifies that the development of Sizewell C would not be expected to take place without some significant impacts. However, the assessment recognises the potential acceptability of those impacts in view of the national need for nuclear power generation and the scarcity of alternative sites."

In respect to the last sentence, KcCPC also note recent events in Anglesey, Gloucestershire & Cumbria.

3.3.7 KcCPC note the content of the paragraph

3.3.8 KcCPC note the content of the paragraph

KcCPC note references to Annex C and are cognisant of its content, published in 2011.

3.3.9 KcCPC note the content of the paragraph

3.3.10 KcCPC note the content of the paragraph

KcCPC also note that within Annex C "This assessment has outlined that there are a number of areas which will require further consideration by the applicant, the IPC and/or the regulators should an application for development consent come forward…"

and that "The strategic level assessment undertaken by the Government did not include detailed traffic assessments as this will depend on a number of factors which aren't yet known such as the timing and phasing of development. Section 5.13 of EN-1 contains policy on consideration of traffic and transport impacts which would be undertaken should an application for development consent come forward."

3.3.11 KcCPC note the content of the paragraph

3.3.12 KcCPC note the content of the paragraph

3.3.13 KcCPC note the content of the paragraph

3.4 Planning Regime

3.4.1 KcCPC note the content of the paragraph

KcCPC note with interest the assertion that "Sizewell B was granted planning permission in 1987, following a public inquiry, with the support of the Suffolk County Council and a recognition that an application for Sizewell C would follow."

3.4.2 KcCPC note the content of the paragraph

KcCPC note a somewhat liberal, albeit factually correct interpretation of the word 'current' within "The site's identification in current national policy reconfirms the historic recognition of Sizewell as a suitable location for nuclear power generation."

3.5 National Policy Statements

3.5.1 KcCPC note the content of the paragraph

3.5.2 KcCPC note the content of the paragraph

3.5.3 KcCPC note the content of the paragraph

3.5.4 KcCPC note the content of the paragraph

3.5.5 KcCPC note the content of the paragraph

KcCPC draw notice to NPS EN-1 whereby "The decision maker should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or lead to air quality breaches of any national air quality limits. In all cases, the decision maker must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed."

and "The decision maker should not grant development consent unless it is satisfied that the proposals will meet the following aims:

– avoid significant adverse impacts on health and quality of life from noise;

and

– mitigate and minimise other adverse impacts on health and quality of life from noise;

and

– where possible, contribute to improvements to health and quality of life through the effective management and control of noise."

Moreover, "A new energy NSIP **may give rise to substantial impacts on the surrounding transport infrastructure and the decision maker should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development**. Detrimental impacts on the surrounding transport infrastructure should be managed and mitigated during all stages of the development. Demand management measures must be considered, including other modes of transport such as water-borne or rail transport. Controls must be put in place for Heavy Goods Vehicle (HGV) movements, ensuring arrangements are in place for any abnormal disruption."

"Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the decision maker should consider requirements to mitigate adverse impacts on transport networks arising from the development…"

3.5.6 KcCPC note the content of the paragraph

3.5.7 KcCPC note the content of the paragraph

3.6 Other planning policy considerations

3.6.1 KcCPC note the content of the paragraph

3.6.2 KcCPC note the content of the paragraph

a) National Planning Policy Framework

3.6.3 KcCPC note the content of the paragraph

3.6.4 KcCPC note the content of the paragraph

3.6.5 KcCPC note the content of the paragraph

KcCPC is puzzled by the inclusion of a paragraph that asserts that "The project would deliver substantial benefits that the NPPF identifies as being important to the achievement of sustainable development." when in a prior paragraph EDF Energy point out that "Neither the NPPF nor local planning policy is specifically identified as a matter to be taken into account…"

b) Local Planning Policy

3.6.6 KcCPC note the content of the paragraph

3.6.7 KcCPC note the content of the paragraph

3.6.8 KcCPC note the content of the paragraph

3.6.9 KcCPC note the content of the paragraph

3.6.10 KcCPC note the content of the paragraph

3.7 Implications of planning policy

3.7.1 KcCPC note the content of the paragraph

3.7.2 KcCPC note the content of the paragraph

3.7.3 KcCPC note the content of the paragraph

KcCPC note with interest that EDF Energy assert that "…Balancing the environmental sensitivities and local effects with the need for the development of a NSIP calls for a thoughtful approach to the design and implementation of the project, informed by a full understanding of the environmental qualities of the area."

3.7.4 KcCPC note the content of the paragraph

3.7.5 KcCPC note the content of the paragraph

4. Socio-Economics (Volume 1, Pages 44 to 84)

4.1 Introduction

4.1.1 KcCPC note the content of the paragraph

4.1.2 KcCPC note the content of the paragraph

4.1.3 KcCPC note the content of the paragraph

4.1.4 KcCPC note the content of the paragraph

4.1.5 KcCPC note the content of the paragraph

4.1.6 KcCPC note the content of the paragraph

4.1.7 KcCPC note the content of the paragraph

4.1.8 KcCPC note the content of the paragraph

4.1.9 KcCPC note the content of the paragraph

a) Setting the policy context for Sizewell C

4.1.10 KcCPC note the content of the paragraph

4.1.11 KcCPC note the content of the paragraph

4.1.12 KcCPC note the content of the paragraph

KcCPC note the requirement for the socio-economic effects of the project to be assessed, and note that the "effects on tourism", "social cohesion" and "cumulative effects" are included.

b) Defining the socio-economic parameters and assumptions

4.1.13 KcCPC note the content of the paragraph

4.1.14 KcCPC note the content of the paragraph

KcCPC specifically note that the "workforce profile", "workforce characteristics" and "Workforce accommodation assumptions and spatial distribution" are used in assessing the socio-economic impact of the project.

KcCPC is concerned that the breadth of the socio-economic assessment, particularly in respect to "Workforce characteristics" appears to be largely based on numeric modelling (i.e. demographic, economic and housing choice/preference), with seemingly little weight given to behavioural, attitudinal and cultural characteristics of a large, mobile workforce.

KcCPC believes that the potential socio-economic impacts of a large mobile workforce on; "community cohesion" and "tourism" goes far deeper than a numeric modelling approach.

KcCPC would have expected an experienced utiliser of large mobile workforces, like EDF Energy, to appreciate this and have developed a more sophisticated modelling environment.

4.1.15 KcCPC note the content of the paragraph

4.1.16 KcCPC note the content of the paragraph

4.1.17 KcCPC note the content of the paragraph

4.1.18 KcCPC note the content of the paragraph

4.1.19 KcCPC note the content of the paragraph and Figure 4.1

See comments at 4.1.14 above

4.1.20 KcCPC note the content of the paragraph

4.2 Socio-economic project assumptions

a) Overarching principles

4.2.1 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "avoid, mitigate or manage significant adverse…social impacts that would directly arise from the construction…"

See comments at 4.1.14 above

4.2.2 KcCPC note the content of the paragraph

KcCPC note the intent to "…to impose and enforce a Code of Conduct on the Sizewell C workforce…".

With a significant portion of the workforce anticipated to 'self-commute' to either the; Northern Park and Ride, Southern Park and Ride or direct to the Main Construction Site, can EDF Energy outline the requirements that will be placed on these members of the workforce as they travel to and from Sizewell C and how these will be enforced?

KcCPC is aware that issues such as 'fly parking', 'rat running', poor driving behaviours, indiscriminately discarded waste, etc. have the potential to impact large swathes of Suffolk, Essex, Norfolk and Cambridgeshire, impacting not only residents but also visitors and tourists.

b) Workforce profile and local recruitment

4.2.3 KcCPC note the content of the paragraph

4.2.4 KcCPC note the content of the paragraph

4.2.5 KcCPC note the content of the paragraph

4.2.6 KcCPC note the content of the paragraph and Figures 4.2 & 4.3

KcCPC note and regret that the intent seems to be the maintenance of a high proportion of non-home-based workers for the bulk of the Construction Phase.

KcCPC anticipates this EDF Energy workforce strategy will further exacerbate A12 traffic issues arising from the high dependency on HGV movements (irrespective of the transport strategy selected).

KcCPC note that the revised EDF Energy targets for Car Sharing still lack ambition and fall far short of those achievable where; environmental, neighbour relations, 'considerate contractor' and ethical policies are embraced.

KcCPC also foresee that as a direct result of this strategy; tourism will be detrimentally impacted, conditions in the minor road networks will deteriorate quickly and dramatically, noise, air quality and resident amenity will all be impacted and the environmental impact will be far broader than the immediate area surrounding the Main Development Site.

4.2.7 KcCPC note the content of the paragraph and Table 4.1

4.2.8 KcCPC note the content of the paragraph

KcCPC note and welcome the creation of 500 jobs that seemingly will be serviced by home-based workers.

However, it regrets the implication that these are regarded as low skill, and by inference low paid opportunities, thereby "…limiting the extent to which they would need to draw on skills from outside the area."

4.2.9 KcCPC note the content of the paragraph

KcCPC note and welcome the creation of 500 jobs that seemingly will be serviced by home-based workers.

However, it regrets the implication that **security, catering, administration, etc.** are regarded as low skill, and by inference low paid, thereby "…limiting the extent to which they would need to draw on skills from outside the area."

4.2.10 KcCPC note the content of the paragraph

KcCPC is concerned that amid the confidence about recruiting people with relevant skills, no reference is made to a significant housebuilding programme in Suffolk, and particularly East Suffolk. As most of this programme occurs within the same timeframe as the EDF Energy development, the potential impacts on either/or both to attract the requisite skills in sufficient enough numbers from a reasonable radius, at a reasonable cost seem quite significant.

Likewise, KcCPC is concerned at the potential denuding of locally scarce resources in trades for small building works and building maintenance (i.e. carpenters, plumbers, electricians, etc.), resulting in a shortage of valuable services to all Suffolk residents and particularly a potentially disproportionate impact on the elderly and vulnerable.

4.2.11 KcCPC note the content of the paragraph

Please refer to the general comments at 4.2.10 (above)

4.2.12 KcCPC note the content of the paragraph

KcCPC note that East Suffolk and surrounding District Council areas do have significant 'retired' populations, some of whom have considerable experience in project/programme management, Health & Safety, Environmental and professional disciplines.

KcCPC suggests that EGF Energy look specifically at this opportunity and examining options for 'assignment' type employment to leverage local skills further.

4.2.13 KcCPC note the content of the paragraph

4.2.14 KcCPC note the content of the paragraph and Figure 4.3

KcCPC note the assertion that "…the approximate 2,000 plus 500 'home-based' workers represent the peak of construction. For this short period the demand for highly specialised M&E roles is also at its peak.". In this connection, KcCPC wonder what EDF Energy believes constitutes a "short period", as from the figures it is not clear?

4.2.15 KcCPC note the content of the paragraph and Table 4.2

4.2.16 KcCPC note the content of the paragraph

KcCPC note that this paragraph makes no mention of the traffic or environmental impacts "…if the NHB workforce were to be larger…".

4.2.17 KcCPC note the content of the paragraph

KcCPC is very concerned to note that "…we have considered throughout this chapter what the effects might be of a peak workforce of 7,900 in order to ensure that our strategies and assessments are robust and to consider whether any additional mitigation would be necessary."

KcCPC note and welcome EDF Energy testing the potential impact of an increased workforce on the main development site However, KcCPC is shocked that EDF Energy felt it necessary to test a rise in excess of 40% above the "central estimate".

That said, recently reported step increases in workforce numbers at Hinkley Point C would seem to point to a systemic understating of base case estimates!

4.2.18 KcCPC note the content of the paragraph

c) UK construction workforce characteristics

4.2.19 KcCPC note the content of the paragraph

4.2.20 KcCPC note the content of the paragraph

KcCPC is concerned that the breadth of the socio-economic assessment, particularly in respect to "Workforce characteristics" appears to be largely based on numeric modelling (i.e. demographic, economic and housing choice/preference), with seemingly little weight given to behavioural, attitudinal and cultural characteristics of a large, mobile workforce.

KcCPC believes that the potential socio-economic impacts of a large mobile workforce on; "community cohesion" and "tourism" goes far deeper than a numeric modelling approach.

KcCPC would have expected an experienced utiliser of large mobile workforces, like EDF Energy, to appreciate this and have developed a more sophisticated modelling environment.

4.2.21 KcCPC note the content of the paragraph

Please refer to comments at 4.2.20 (above)

KcCPC note that "Building a profile of the construction workforce…enables us to work with the community and local authorities who provide public services to prepare for any potential service demand from specific groups, and ensure that barriers to integration of workers and the community are limited."

KcCPC note the inference that it is for (solely) the communities, local authorities and public service providers "…to prepare…ensure that barriers…are limited".

KcCPC wonder what integration steps are planned by EDF Energy with the workforce (i.e. directly employed, contacted, sub-contracted, casual etc.) prior to their arrival at the workplace, thereby providing some symmetry in commitment and delivery.

For example, if as seems likely and proper the workforce is diverse, will EDF Energy be funding a translation service enabling; the workforce to effectively access services and the services to effectively communicate with members of the workforce.

4.2.22 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.23 KcCPC note the content of the paragraph

4.2.24 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.25 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.26 KcCPC note the content of the paragraph

4.2.27 KcCPC note the content of the paragraph

d) Workforce accommodation choices

4.2.28 KcCPC note the content of the paragraph

4.2.29 KcCPC note the content of the paragraph

4.2.30 KcCPC note the content of the paragraph

KcCPC believes that the immediate Parishes and adjoining neighbours to the proposed campus and caravan arrangements should be best placed to make informed comment.

However, as a close-by Parish, KcCPC would look to EDF Energy to take determined action to ensure that residents of the campus and caravan site do not engage in 'fly parking', 'rat running', poor driving behaviours, indiscriminately discarding waste, etc. when travelling to and from their accommodation.

4.2.31 KcCPC note the content of the paragraph

4.2.32 KcCPC note the content of the paragraph

KcCPC understand that currently Houses of Multiple Occupation [HMO's] are relatively rare in the immediate area. As a consequence, and in order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter across all types of residential properties.

4.2.33 KcCPC note the content of the paragraph

In order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter/tenant across all types of residential properties.

4.2.34 KcCPC note the content of the paragraph

4.2.35 KcCPC note the content of the paragraph

4.2.36 KcCPC note the content of the paragraph

In order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter/tenant across all types of residential properties including all classes of 'latent accommodation'.

e) Workforce distribution (via a "Gravity Model")

4.2.37 KcCPC note the content of the paragraph

4.2.38 KcCPC note the content of the paragraph

4.2.39 KcCPC note the content of the paragraph

4.2.40 KcCPC note the content of the paragraph

4.2.41 KcCPC note the content of the paragraph

KcCPC note that "The Gravity Model results have been used to inform the traffic modelling detailed in Chapter 6 of this volume and the wider transport strategy in Chapter 5 of this volume, as well as the assessment of socio-economic effects." but is disappointed that an easily digestible graphic representation has not accompanied the consultation.

In this respect, KcCPC note that throughout the consultation documentation EDF Energy seemingly resist putting data into a digestible format. Even where data is easily visualised, the omission of a graduated measure (i.e. at 'time line' x axis on Figures 4.2 and 4.3) makes interpretation less than clear and in the worst case potentially ambiguous.

So, whilst the use of a '90-minute commute' model is potentially a good base assertion, it is difficult to visualise what this means in reality. For example, where are the likely commute centres, what routes provide the '90 minute' criteria, what are the real routing options, what are the predicted traffic flows, what is the current observed behaviours, where does each commute 'land' in the high traffic routes, etc.

KcCPC look to EDF Energy to put much more of the HBW modelling into the public domain, in a digestible form, prior to an application being made for a Development Consent order.

4.2.42 KcCPC note the content of the paragraph

Please refer to comments at 4.2.41 (above)

4.2.43 KcCPC note the content of the paragraph

Please refer to comments at 4.2.41 (above)

4.2.44 KcCPC note the content of the paragraph

KcCPC note the assertion "The scale of the construction workforce, and the number of NHB workers who would be likely to seek accommodation in the local area, needs to be seen in the context of the wider residential population. The NHB workforce would be a relatively small number in the context of the existing population of Suffolk (0.8% of approximately 432,500 working age residents) and of the nearest districts of Suffolk Coastal and Waveney (around 2.7%).

However, the residential development laid out in the Suffolk Coastal District Council's Draft Local Plan recognises that residential accommodation in the area is already beyond the reach of many residents, their families and dependents. As a consequence, greater emphasis is being placed on affordable housing developments.

Consequently, the localised influx of another potentially inflationary impact on housing, over and above second home ownership, tourist accommodation and private rental is potentially damaging to the aspirations of local residents and the SCDC Local Plans' intent.

4.2.45 KcCPC note the content of the paragraph

Please refer to comments at 4.2.44 (above)

4.3 Construction Workforce Accommodation Strategy

a) Introduction

4.3.1 KcCPC note the content of the paragraph

4.3.2 KcCPC note the content of the paragraph

4.3.3 KcCPC note the content of the paragraph

4.3.4 KcCPC note the content of the paragraph

b) Stage 2 consultation

4.3.5 KcCPC note the content of the paragraph and Table 4.3

Please refer to comments at 4.2.44 (above)

c) The private rented sector - Potential effects on the PRS and housing need and vulnerability

4.3.6 KcCPC note the content of the paragraph

KcCPC note with grave concern that "…NHB workers are expected to seek property in the PRS within 60-minutes of the main development site at the peak of construction." as the impact on rental properties in the immediate area (i.e. Kelsale cum Carlton, Saxmundham, etc.) would invariably move more opportunities out of the reach of local people.

Please also refer to comments at 4.2.44 (above)

4.3.7 KcCPC note the content of the paragraph

KcCPC note with grave concern that "information from contractors at Hinkley Point C, the majority of construction workers tend to share accommodation where possible (an average rate of 1.9 workers per home)" as the impact on rental properties in the immediate area (i.e. Kelsale cum Carlton, Saxmundham, etc.) would invariably move more opportunities out of the reach of local people, particularly the young. This may exacerbate the loss of young people to more urban areas.

Please refer to comments at 4.2.44 (above)

4.3.8 KcCPC confirm their agreement with the conclusion of the paragraph

Specifically, "Workers' accommodation preferences are therefore expected to overlap particularly with local residents within the lower quartile of market rents, within smaller (1-2 bed) properties…"

Please refer to comments at 4.2.44, 4.3.6 & 4.3.7 (above)

4.3.9 KcCPC note the content of the paragraph

4.3.10 KcCPC note with grave concern the inference that additional PRS rent inflationary pressures may arise as a consequence of EDG Energy workforce's preferences, sitting as they do, squarely in the same space as local peoples needs, and that Homeless Presentations may rise as a function of this.

4.3.11 KcCPC note the content of the paragraph

KcCPC note that EDF Energy is "…is keen to ensure that demand for PRS accommodation from workers causes as few significant adverse effects on housing need and vulnerability as possible and has been working with SCDC and WDC to identify and scope potential effects and to identify measures to avoid, minimise and mitigate them."

4.3.12 KcCPC note the content of the paragraph

KcCPC note with grave concern that, in the context of the preceding paragraphs and KcCPC's responses to them "…Discussions have focused on Leiston in particular, as the settlement closest to the site and therefore likely to attract the largest number of construction workers looking for accommodation at peak."

KcCPC is concerned that whilst Leiston will potentially be the initial area impacted, the ripples will move at great speed and therefore discussions should be broadened to develop a holistic approach to the Suffolk Coastal area, rather than the implied piecemeal approach. This comment is made in full recognition of the irrational nature of residential markets.

4.3.13 KcCPC note the content of the paragraph

KcCPC note and support the assertion that "Leiston is expected to be where vulnerability is greatest (based on housing register and socio-economic data…particularly for young people (and care-leavers) who may be out of work and without access to housing benefit and who the council will seek to place in private rented accommodation." but believes there are other similar (numerically smaller) issues throughout the urban centres and rural areas throughout the Suffolk Coastal area.

4.3.14 KcCPC note the content of the paragraph

KcCPC note the comment that "…workers likely to seek private rented accommodation in the area (around 360), and in Leiston in particular (around 100). Due to inclusion of an additional 600 bed spaces at the LEEIE caravan site, this number has reduced slightly at this Stage 3 consultation." and is concerned that this reduction would be quickly lost if the workforce numbers rose in line with the stress testing that has been undertaken, or Sizewell C mirrors the recent experience of Hinkley Point C. As a consequence, KcCPC remains unconvinced that any improvement would be sustained.

Potential effects on tourist accommodation

4.3.15 KcCPC note the content of the paragraph

KcCPC note with concern the assertion that "the effect of workers coming into the PRS on housing pressure will be mitigated through measures to improve and enhance housing supply". KcCPC is not familiar with this interpretation of the case for the housing supply increase outlined in the SCDC Final Draft Local Plan and would like EDF Energy to make public any evidence they have that demonstrate this is an adopted policy of the local authority.

4.3.16 KcCPC note the content of the paragraph

KcCPC note "EDF Energy is aware that in the summer peak a significant number of tourists visit the Suffolk Coast. The use of tourist accommodation by workers may have adverse economic impacts if tourists are displaced from accommodation. For off-peak times of the year, the use of tourist accommodation by construction workers could have beneficial economic effects, maintaining local spend and employment in these areas.". and is very concerned that EDF appear unfamiliar with the avowed intent (portrayed in the Final Draft Local Plan) of SCDC to develop 'year-round tourism' between 2019 and 2036. Moreover, this strategic plank is portrayed as a major contributor to enduring jobs growth, local prosperity and improvements in the well-being of Suffolk Coastal residents.

KcCPC would like EDF Energy to make public any evidence they have that demonstrate this is an agreed position with the local authority(ies). In the event that evidence is not forthcoming, KcCPC would like EDF Energy to place in the public domain the detailed analysis demonstrating that, compared to the projected growth of tourism in Coastal Suffolk (through to 2036) – "the use of tourist accommodation by construction workers could have beneficial economic effects, maintaining local spend and employment in these areas."

4.3.17 KcCPC note the content of the paragraph

4.3.18 KcCPC note the content of the paragraph

4.3.19 KcCPC note the content of the paragraph

4.3.20 KcCPC note the content of the paragraph

KcCPC note with concern that "Since Stage 2…central case figures have reduced as a result of our Stage 3 proposal to add temporary caravan accommodation in addition to the proposed accommodation campus, and by re-assessing assumptions about worker's likelihood to choose PRS accommodation over tourist sector accommodation (set out in Figure 4.4). This figure may reduce further if workers use latent accommodation.".

KcCPC construe this tortuous explanation to signpost a greater worker interest in PRS accommodation than previously forecast, principally as a result of tourist accommodation being more expensive. As a result, KcCPC believes pressure on PRS rents to rise will invariably follow, moving more property out of the grasp of local people who have immediate and growing needs – as identified in the SCDC Final Draft Local Plan.

Latent accommodation

4.3.21 KcCPC note the content of the paragraph

KcCPC note that "Latent accommodation includes unrated tourist accommodation, rooms for let in private homes, and accommodation new to the market each year. This type of accommodation would offer an opportunity to mitigate negative effects on tourist and PRS capacity, as well as allowing local residents to benefit economically, for example, by renting out spare rooms." and conclude that EDF Energy's remedy to a potential 'housing crisis' of its own making, is to persuade residents and workers to coalesce in the 'bringing forward of' and 'the accepting of' a basket of largely unregulated accommodation solutions.

KcCPC understands that this arrangement may suit many local residents and hopefully (in equal numbers) is also an attractive proposition to members of the workforce.

However, KcCPC also recognises that these forms of arrangements do carry significant potential risks if not undertaken with clear knowledge of the obligations and responsibilities (i.e. legal, insurance, planning, environmental health, consideration for neighbours, etc.).

Consequently, KcCPC would like to understand what support services EDF Energy intend to provide to ensure both potential providers of accommodation and members of the workforce do not inadvertently find themselves in difficult territory.

4.3.22 KcCPC note the content of the paragraph

4.3.23 KcCPC note the content of the paragraph

KcCPC note that "…in Leiston there are approximately 300 under-occupied homes (i.e. with more bedrooms than residents) with 400 spare rooms across all sectors, so this is potentially a rich source of accommodation that would avoid uptake of accommodation in other sectors while making more efficient use of existing stock."

However, KcCPC would suggest that these figures are treated with a high degree of caution as often the 'un-occupied' bedroom is used for other productive purposes (i.e. homeworking, absent children, non-work oriented study, workroom, hobbies, etc.).

It is understood that there is some evidence that a significant number of households previously categorised 'empty nesters' (at or after the 2011 Census) have since reverted to 'refuges' for young adults unable to secure permanent accommodation (i.e. employed graduates, ex-services children, etc.).

d) Accommodation Strategy

4.3.24 KcCPC note the content of the paragraph

4.3.25 KcCPC note the content of the paragraph

Accommodation management system

4.3.26 KcCPC note the content of the paragraph

Please refer to comments at 4.3.21 (above)

KcCPC would like to understand what support services EDF Energy intend to provide to ensure both potential providers of accommodation and members of the workforce do not inadvertently find themselves in difficult territory.

Temporary worker accommodation (TWA) – campus

4.3.27 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.28 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.29 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

Temporary worker accommodation (TWA) – caravans

4.3.30 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.31 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.32 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

Identification of additional capacity in the tourist sector

4.3.33 KcCPC note the content of the paragraph

KcCPC seeks reassurance from EDF Energy and SCDC that any expansion of pre-existing or new sites (outside of those with Consultation 3) will be through the normal Planning Application and Licencing processes and not through the application for a Development Consent Order.

A housing fund

4.3.34 to 40 KcCPC note the content of the paragraphs (4.3.34 to 4.3.40) and Table 4.4

KcCPC note the content and intent of Paragraphs (4.3.34 to 4.3.40) and the details in Table 4.4.

KcCPC's position is that it broadly agrees with the purpose of the fund, the scope of it and the strategic intent.

However, KcCPC is not expert in, aware of, or competent to comment on much of the content. Consequently, it agrees that Local Authority expertise should be the pre-eminent source of opinion regarding this initiative.

That said KcCPC is eager to understand (amongst many other facets); the mechanism's to be employed, the conduct and management of the processes and procedures, the accountability for end-to-end integrity, the number of Local Authorities involved and the full measurement set to be published (in the public domain), thereby ensuring transparency and continuity across individual Local Authority boundaries.

KcCPC would also like absolute clarity on what constitutes the so called '60-minute area', as it seems ill defined within Consultation 3 and is subject to interpretation.

It is assumed that until this is fully detailed it is likely to involve; East Suffolk (currently SCDC & Waveney District Councils), Babergh and Mid Suffolk, Ipswich Borough, Forest Heath, St Edmundsbury, some of the South Norfolk District Councils, potentially some of the North Essex District Councils, etc.

Finally, KcCPC wish to understand the audit arrangements (operational as well as financial) that will be put in place to ensure; impact, efficacy and value for money.

Managing impacts in the 7,900-workforce assessment case

4.3.41 KcCPC note with grave concern the content of the paragraph

KcCPC specifically notes "…since Stage 2 we have also considered the potential implications if the NHB workforce were to be larger. This enables us to ensure that our strategies are comprehensive and robust, so that should the workforce increase over the 'central case', the project has the flexibility to respond to any effects and to mitigate them."

KcCPC is anxious that "…we have also considered the potential implications if the NHB workforce were to be larger." has in fact become a Trojan Horse aimed at seeking and obtaining consent for a worryingly flexible approach to construction workforce utilisation, up to and over 40% greater than that previously coined as EDF Energy's 'central case'.

This is seen by KcCPC as nothing other than a cynical ploy to overcome some of the consequences of project planning deficiencies recently evidenced at Hinkley Point C.

4.3.42 KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

4.3.43 KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

4.3.44 KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

4.3.45 KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

4.3.46 KcCPC note with grave concern the content of the paragraph and Figure 4.4

Please refer to comments at 4.3.41 (above)

4.3 Social/community strategy

a) Introduction

4.4.1 KcCPC note the content of the paragraph

KcCPC note that whilst there is a richness of structured research in the use (and abuse) of demographic profiling particularly in marketing, there seems far less 'first world' structured research on the changes in the demographic profile of a community bought about by protracted exposure to a radically different one.

However, there does appear to be a body of thought (developed out of the recent experiences of tribes in the Amazon Basin and sub-Saharan Africa) that, the exposure of a community with a shared demographic profile can be altered or fractured by exposure to a radically different one.

Consequently, with a protracted construction phase and a large omnipresent workforce, it is not possible to discount lasting impacts on communities, as well as well those in the short term.

4.4.2 KcCPC note the content of the paragraph

KcCPC understands that the potential impacts of a large workforce, present over a sustained period, may drive attitudinal, behavioural and cultural change in the local populations, and that in turn this may require modification or the re-engineering of service availability and delivery.

4.4.3 KcCPC note the content of the paragraph

KcCPC understands that the potential impacts of a large workforce, present over a sustained period, may lead to real and perceived changes in community cohesion and integration, not all of which will be positive.

b) Stage 2 consultation

4.4.4 KcCPC note the content of the paragraph and Table 4.5

4.4.5 KcCPC note the content of the paragraph

KcCPC welcomes the stated intent of undertaking detailed audits of "…existing and future school places, sport and leisure facilities, healthcare, social services and children's services." however it is not clear what area will be covered by the audit. Clarification from EDF Energy on the agreed coverage would be welcomed prior to the audit being commenced and thence prior to an application for a development consent order.

4.4.6 KcCPC note the content of the paragraph

KcCPC welcomes the engagement with SCC and other stakeholders in respect to the potential effects of the construction workforce on the provision of healthcare, social care for adults and young people, the use of local facilities. However, as a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "…settlement close to the site…" for the purpose of having full consideration in these discussions.

4.4.7 KcCPC note the content of the paragraph

KcCPC welcomes the intended audit activity and as a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "…settlement close to the site…" for the purpose of having full consideration in the audit.

4.4.8 KcCPC note the content of the paragraph

4.4.9 KcCPC note the content of the paragraph

KcCPC welcomes the intended collaboration between EDF Energy and other service providers to develop ways of mitigating any effects on existing capacity. As a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "…settlement close to the site…" for the purpose of having full consideration in the collaborative work.

4.4.10 KcCPC note the content of the paragraph

KcCPC note the use of "…adequately avoided…" the prefacing of avoidance with 'adequately' implying…that it is expected to be less than optimal?

Schools and childcare

4.4.11 KcCPC note the content of the paragraph

KcCPC wish to make EDF Energy aware that as host to a respected and performing school - Kelsale CEVC Primary School, it is currently operating close to capacity, a fact that SCC and SCDC are well aware of.

Nevertheless, potential funding for an additional classroom has recently been removed and a development of 43 dwellings in the immediate area has been approved, many of which are family homes.

KcCPC is profoundly concerned that with potential relief only coming with the development of a new provision at the planned Saxmundham Garden development, without action this issue will become critical in the next year, maybe two.

KcCPC is also aware of a locality shortage of capacity in 'Early Years' provision, another area where the Saxmundham Garden development is planned to offer some relief.

4.4.12 KcCPC note the content of the paragraph

4.4.13 KcCPC note the content of the paragraph

4.4.14 KcCPC note the content of the paragraph

See comments at 4.4.11 (above)

4.4.15 KcCPC note the content of the paragraph

See comments at 4.4.11 (above)

Social services (adult and children's services and safeguarding)

4.4.16 KcCPC note the content of the paragraph

4.4.17 KcCPC note the content of the paragraph

See comments at 4.4.1, 4.4.2 & 4.4.3 (above)

KcCPC whilst recognising the proposed workforce testing environment, are concerned that the Sizewell C development could potentially become a focus for the attentions of so called 'County Lines' operators.

KcCPC would hope that a Suffolk Constabulary led initiative, are leading work with the local authorities and EDF Energy to develop appropriate strategies for the mitigation of the potential issue, not only in the immediate area but throughout the surrounding towns and villages.

4.4.18 KcCPC note the content of the paragraph

4.4.19 KcCPC note the content of the paragraph

Healthcare facilities

4.4.20 KcCPC note the content of the paragraph

4.4.21 KcCPC note the content of the paragraph

4.4.22 KcCPC note the content of the paragraph

4.4.23 KcCPC note the content of the paragraph

4.4.24 KcCPC note the content of the paragraph

KcCPC is very interested to understand what steps are planned to mitigate the impacts of all the traffic movements directly and indirectly related to the development of Sizewell C.

However, KcCPC believes that it is not only an issue for Ambulance, but also Police, Fire & Rescue and Coastguard Services in responding to emergency calls.

Of particular concern are the; local road network, single carriageway sections of the A12 and rural locations throughout the Suffolk Coastal area.

In respect to the Ambulance Service KcCPC believes it is fundamental that any designed mitigations, also permit unfettered access south and/or north and/or West to take patients to the appropriately equipped hospital, after initial treatment by the ambulance crew.

Emergency services and emergency preparedness

4.4.25 KcCPC note the content of the paragraph

See comments at 4.4.24 (above)

4.4.26 KcCPC note the content of the paragraph

4.4.27 KcCPC note the content of the paragraph

4.4.28 KcCPC note the content of the paragraph

4.4.29 KcCPC note the content of the paragraph

Whilst KcCPC understands the underpinning rationale that drives "…approach for monitoring and mitigation of effects based on the level of NHB workforce (excluding those paying council tax) and number of incidents;" it is difficult to see how management of a two-tier arrangement could possibly be robust and have sufficient enough integrity without carrying an enormous overhead (for both EDF Energy and the service providers).

EDF Energy must place in the public domain a full cost/benefit analysis of any proposed process prior to its agreement and inception. Alternatively, a workforce 'per capita' model could be adopted, without the implied complexity and overhead!

4.4.30 KcCPC note the content of the paragraph

KcCPC notes that Sizewell B is a live environment and therefore is keen to understand whether the Sizewell B emergency arrangements are readily 'scalable' (as implied in this paragraph) to encompass the entire construction process of Sizewell C through to receipt of the first nuclear fuel on site?

Presumably this has been independently and verified?

If not, KcCPC respectfully suggest that this should be a pre-requirement prior to any application to the Planning Inspectorate.

Sports and recreation

4.4.31 to 44 KcCPC note the content of these paragraphs

KcCPC note that these paragraphs deal with the more 'structured environment' sport and recreation facilities, but do not mention other sport and recreational pursuits where high numbers of participants may impact the local environment and residents in the Suffolk Coastal area (e.g. road cycling, road running, off-road running, orienteering, walking, horse riding, BMX, etc.).

However, taking into account the outline workforce profile, it is also possible that other more intrusive pastimes could radically impact the environment and the amenity enjoyed by existing residents (e.g. drone flying & racing, other model aircraft flying and racing, recreational motor cycling, off-roading, so called 'green laning', jet-skiing, power boating, quad biking, motocross etc.).

Can EDF Energy confirm that consideration has been given to these issues and the concomitant impacts. If so can EDF Energy also put in the public domain what avoidance measures and/or mitigations have been developed?

If not KcCPC believes that full consideration of sports and recreational impacts must be given prior to an application being made for a Development Order.

Community cohesion/integration

4.4.45 KcCPC note the content of this paragraph

4.4.46 KcCPC note the content of this paragraph

See comments at 4.4.1, 4.4.2, 4.4.3 & 4.4.17 (above)

4.4.47 KcCPC note the content of this paragraph

4.4.48 KcCPC note the content of this paragraph and Table 4.6

Health and wellbeing

4.4.49 KcCPC note the content of this paragraph

4.4.50 KcCPC note the content of this paragraph

4.4.51 KcCPC note the content of this paragraph

4.4.52 KcCPC note the content of this paragraph and Table 4.7

4.4.53 KcCPC note the content of this paragraph

KcCPC note that for pragmatic purposes "…the HIA will be completed towards the end of the pre-application period (post Stage 3)." but want reassurance that the final HIA will be agreed with the key stakeholders prior to the submission of an application being made?

4.4.54 KcCPC note the content of this paragraph

4.4.55 KcCPC note the content of this paragraph

Local, in-combination effects – Community Impact Reports

4.4.56 KcCPC note the content of this paragraph

4.4.57 KcCPC note the content of this paragraph

4.4.58 KcCPC note the content of this paragraph

KcCPC is concerned that whilst this paragraph contains "…This will include but not be limited to Leiston, Theberton and Eastbridge.", it is not satisfactory to omit Parishes where there is a potential and/or specific impact (i.e. Kelsale cum Carlton - the link road proposal, 85% of HGV traffic passing through the Parish and the arsing noise, pollution, dust and air quality issues within yards of Parish residents).

Therefore, KcCPC insist that a Community Impact Report should be made for each community adjacent to the A12 from the FMF in the South to to the Sizewell C site (where requested by the Parish Council) and from the North & West where appropriate (and where requested by the Parish Council).

4.4.59 KcCPC note the content of this paragraph

KcCPC note and welcome the proposal that a Community Fund be established as part of the Section 106 agreement, "to ensure communities could access compensation for general or combined disruption as effects arise.".

However, KcCPC believes that considerably more focus should be placed on the avoidance of the effects (immediate and 'whole life') of construction and operation of the Sizewell C site than is evident at present and would not like to think that a Community Fund becomes an alternative to good, diligent research and planning.

KcCPC is very aware that "urgency" in projects and programmes can lead to a disproportionate emphasis on the temporal dimension, often accompanied by the easing of performance limits in the fiscal and qualitative dimensions.

The maxim of "fail to prepare, prepare to fail" may be old, but it still has currency in modern programmes, as evidenced in recent civil engineering programmes that have incurred enormous overspends.

Community fund

4.4.60 KcCPC note the content of this paragraph

See comments at 4.4.59 (above)

4.4.61 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

4.4.62 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

4.4.63 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

Community Safety Management Plan and Worker Code of Conduct

4.4.64 KcCPC note the content of this paragraph

4.4.65 KcCPC note the content of this paragraph

KcCPC expect the Code of Conduct to be extended to include the primary road routes (A12 & A14) and the surrounding road networks, safeguarding; other road users, pedestrians, cyclists, horse riders, dog walkers and joggers by explicit provisions covering both the workforce and contracted drivers etc.

These provisions should reference (as a minimum); obligations under the law, common courtesy, defensive driving, the correct disposal of waste (including human waste), what to do in the event of a breakdown

(motorcycle, car, LGV, HGV and bus), what to do in the event of emergency services vehicles, 'fly parking', 'rat running' etc.

KcCPC expect a draft Code of Conduct to be published for broad community and statutory body consultation, prior to any application being made for a Development Consent Order.

4.4.66 KcCPC note the content of this paragraph

See notes at 4.4.65 (above) for the required expansion of the behaviours and locations included in the Code of Conduct.

4.4.67 KcCPC note the content of this paragraph

4.5 Economic Strategy

4.5.1 KcCPC note the content of the paragraph

4.5.2 KcCPC note the content of the paragraph

a) Stage 2 consultation

4.5.3 KcCPC note the content of the paragraph and Table 4.8

4.5.4 KcCPC note the content of the paragraph

b) Employment in energy and construction

Scale and characteristics of energy and construction employment

4.5.5 - 4.5.12 KcCPC note the content of these paragraphs and Figure 4.5

Sizewell C's influence on employment in construction and operation

4.5.13 - 4.5.14 KcCPC note the content of these paragraphs

The UK's industrial strategy

4.5.15 - 4.5.16 KcCPC note the content of these paragraphs

Construction skills in the UK and the East of England – existing context for construction and energy sector skills

4.5.17 - 4.5.19 KcCPC note the content of these paragraphs

Potential in the labour market and the economic cycle

4.5.20 - 4.5.26 KcCPC note the content of these paragraphs

The potential for workforce displacement

4.5.27 - 4.5.43 KcCPC note the content of these paragraphs

c) Employment, skills and education strategy

4.5.44 - 4.5.60 KcCPC note the content of these paragraphs

A plan for education

4.5.61 – 4.5.69 KcCPC note the content of these paragraphs

d) Business and the construction supply chain

Project value, investment and local benefits

4.5.70 - 4.5.78 KcCPC note the content of these paragraphs

Supply chain engagement strategy

4.5.79 - 4.5.84 KcCPC note the content of these paragraphs

Skills and the supply chain

4.5.85 - 4.5.87 KcCPC note the content of these paragraphs

e) The tourist economy

Scale and characteristics of the tourist economy

4.5.88 - 4.5.93 KcCPC note the content of these paragraphs and Figure 4.6

Establishing potential effects on tourism and avoiding them

4.5.94 KcCPC note the contents of this paragraph

4.5.95 KcCPC note the contents of this paragraph

4.5.96 KcCPC note the contents of this paragraph

4.5.97 KcCPC note the contents of this paragraph

KcCPC note the commencement of Market Research in 2018 and also note there is no methodology described (i.e. impact informed vs control group), no 'early bird' results and no timetable for the production of results.

4.5.98 KcCPC note the contents of this paragraph

KcCPC also note the intention to undertake further research including a quantitative tourism survey, in "…early 2019…", again no details or timetable.

4.5.99 KcCPC note the contents of this paragraph

KcCPC note that the focus of the direct engagement activity appears to be businesses with a compelling 'reason to visit' and/or USP.

However, KcCPC is concerned that many of the jobs and core employment opportunities that lie in Suffolk tourism activity, are in businesses that are not necessarily bestowed with a singular and compelling proposition (i.e. food, drink, retail, services, etc.).

Consequently, there has to be a question mark on whether they are powerful enough to draw tourists from (for example) London and the South East who will look at the North & East Norfolk option, accessed via the M11/A11 corridor versus access to the likes of Aldeburgh, Southwold etc. via an A12 corridor heavy with HGV traffic from the A14/A12 J58.

4.5.100 KcCPC note the contents of this paragraph

KcCPC note EDF Energy recognise that "Environmental impacts, including disturbance due to traffic, noise, light, visual and air quality effects have the potential to indirectly affect tourism." KcCPC note that light pollution in the form of a 'glow dome' from the EDF Energy site at Hinkley Point C is visible from more than 4 miles away (line of sight) and 8 miles (the most direct road route).

KcCPC also note "These are required by law to be assessed and significant effects avoided or mitigated to a level that is not considered significant." and "It is noted that the combination of environmental effects may affect amenity in some locations, and this will be assessed through a non-additive cumulative assessment at the local level."

KcCPC believes that any assessment should be based on an 'additive cumulative assessment' insofar as to do otherwise would permit EDF Energy to limit its mitigation of impacts as though it was the only impact felt by the environment/business/individual concerned.

In contrast, the environment/business/individual concerned has no choice, they have to suffer cumulative impacts irrespective!

Thus, KcCPC believes it is incumbent of any civil engineering project to:

A] Avoid impacts wherever and howsoever they materialise

Then

B] Mitigate impacts where avoidance is unfeasible and/or residual impacts exist

And then

C] Compensate where residual impacts persist

4.5.101 KcCPC note the contents of this paragraph

KcCPC notes the proposed approach, but remains concerned that the focus is still on singular events and/or businesses with a compelling 'reason to visit' and/or USP.

KcCPC remains worried that businesses oriented toward 'passing trade' and 'footfall' will be largely bypassed in this approach and looks to EDF Energy to bring forward more inclusive proposals, prior to any application for a development consent order.

Visitor centre

4.5.102 - 106 KcCPC note the contents of this paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.6 Economic Strategy

4.6.1 KcCPC note the content of the paragraph and Table 4.9

KcCPC note that at Table 4.9, traffic is bundled into a wide range of issues having variable potential impacts:

"Potential adverse effects on tourism due to construction disturbance/traffic/potential beneficial effects of workers using tourist accommodation off-peak."

However, traffic itself has a variety of direct and indirect impacts.

As a consequence, KcCPC want to see traffic (in all of its forms) recognised as a key potential inhibitor of tourist activity in the Suffolk Coastal area.

One only has to think of the impact that traffic has had in creating the almost 'legendary' reputation of the A303, which is hotly contested in 'top trumps' terms by the A3, A30 and the A23!

KcCPC note the "Mitigation/enhancement measures embedded in project" are defined as "Range of measures to improve design, reduce noise, visual and traffic impacts as set out in other chapters." and the "Tourism Fund".
KcCPC believes that the direct and indirect impacts of traffic are being systematically underplayed throughout the consultation with little regard being paid to the compound impact of;

- the SCDC Local Plan housebuilding commitment
- the SCDC Local Plan 'Year-round' tourist ambition
- the Scottish Power Wind Farm Projects (x 4)
- the expansion of the Port of Felixstowe
- the Port of Felixstowe RORO initiative

Moreover, despite the scale of materials required there is little (or no) reference within the consultation in respect to the origin of the HGV movements arriving at the FMF, prior to being sent north up the A12. Should these impact the A12 and/or A14 South and West of Ipswich, the impacts on tourism may be even greater.

4.7 Next Steps

4.7.1 KcCPC note the content of the paragraph

4.7.2 KcCPC note the content of the paragraph

5. Transport Strategy (Volume 1, Pages 85 to 107)

5.1 Introduction

5.1.1 KcCPC note the content of the paragraph

5.1.2 KcCPC note the content of the paragraph

5.1.3 KcCPC note the content of the paragraph

5.1.4 KcCPC note the content of the paragraph

KcCPC note the following:

"EDF Energy has not identified either the rail-led or road-led strategy as preferred at this stage…"

"…we anticipate that the rail-led strategy is likely to involve greater delivery risk…"

"The rail-led strategy in particular involves significantly greater physical work…"

"…we do not yet know whether the necessary rail improvements required in the rail-led strategy are fully feasible or could be delivered on time."

"…in addition to considering the Stage 3 consultation responses, EDF Energy will need to further assess these risks and any potential implications on programme…"

"…as part of its decision on which strategy to pursue in the application for development consent."

5.1.5 KcCPC note the content of the paragraph

5.1.6 KcCPC note the content of the paragraph

KcCPC note the following:

"marine led strategy…EDF Energy has concluded that this is not feasible due to the impacts on marine ecology…"

"…would not meet the "urgent" need for new nuclear power identified by Government in the National Policy Statement (NPS)…"

"a Beach Landing Facility (BLF) is proposed for both strategies."

"…throughout the construction phase under both strategies and during the operational phase…"

5.1.7 KcCPC note the content of the paragraph

5.1.8 KcCPC note the content of the paragraph

5.2 Overview of feedback from the Stage 2 consultation

5.2.1 KcCPC note the content of the paragraph

KcCPC note the following:

"support for the high level transport strategy including the use of park and ride…"

"…and the use of rail and sea to transport freight."

a] Freight

5.2.2 KcCPC note the contents of this paragraph

5.2.3 KcCPC note the contents of this paragraph

5.2.4 KcCPC note the contents of this paragraph

5.2.5 KcCPC note the contents of this paragraph

5.2.6 KcCPC note the contents of this paragraph

5.2.7 KcCPC note the contents of this paragraph

5.2.8 KcCPC note the contents of this paragraph

5.2.9 KcCPC note the contents of this paragraph

5.2.10 KcCPC note the contents of this paragraph

5.2.11 KcCPC note the contents of this paragraph

b] Other consultation responses

5.2.12 KcCPC note the contents of this paragraph

KcCPC note with regret the following:

"We will publish a transport assessment with our application for development consent that will comprehensively set out the modelling work undertaken."

5.2.13 KcCPC note the contents of this paragraph

KcCPC note with regret the following:

"…enables us to identify the timing of necessary highway improvements. Some schemes would be needed to mitigate the early years impacts, while others would not be needed until peak construction."

5.2.14 KcCPC note the contents of this paragraph

5.2.15 KcCPC note the contents of this paragraph

5.2.16 KcCPC note the contents of this paragraph

KcCPC is appalled that EDF Energy propose to drive a "…wholly new route…" through its Parish at this late stage in the consultation and without the courtesy of identifying it as impacting Kelsale cum Carlton residents or advising the Parish Council of their intent.

KcCPC regard this action to be ill advised, poorly thought through and symptomatic of expedient thinking that has delivered an ill-conceived and unsound road proposal.

KcCPC will develop this theme throughout their response.

5.2.17 KcCPC note the contents of this paragraph

KcCPC note the following:

"…also sets out why EDF Energy is not proposing the four-village bypass in either the rail-led or road-led strategies but is working with SCC to support their aspiration for such a scheme, which is now known as the Suffolk Energy Gateway."

5.2.18 KcCPC note the contents of this paragraph

5.2.19 KcCPC note the contents of this paragraph

5.2.20 KcCPC note the contents of this paragraph

5.2.21 KcCPC note the contents of this paragraph

5.2.22 KcCPC note the contents of this paragraph

5.2.23 KcCPC note the contents of this paragraph

5.2.24 KcCPC note the contents of this paragraph

5.2.25 KcCPC note the contents of this paragraph

5.2.26 KcCPC note the contents of this paragraph

c] Revised proposals for Stage 3

5.2.27 KcCPC note the contents of this paragraph

5.2.28 KcCPC note the contents of this paragraph

5.2.29 KcCPC note the contents of this paragraph and Table 5.1

KcCPC is gravely concerned at the amount of fundamental change made in the Transport Strategy since the Stage 2. Rather than a contiguous development through the Consultation phases, EDF Energy's Transport Strategy appears to comprise an ever changing, disconnected assortment of reactive positions, most of which appear; poorly conceived, badly thought through and contrary to the principles of impact avoidance, particularly on key attributes of the Coastal Suffolk area (e.g. the environment, resident amenity and needs, tourism, air quality, etc.).

Specifically, KcCPC note:

- Sizewell Link Road through all phases (construction, operation and into decommissioning) and a 'lasting legacy'
- Freight Management Facility proposals adjacent or close to the A14 J58 that already has a high Volume/Capacity at both peaks with the A12 and circulating flows at near capacity.
- HGV movements over extended hours
- 67% increase in 'typical' daily HGV movements, up to 375 arrivals (750 movements) from 225/450
- 67% increase in 'peak' daily HGV movements, up to 750 arrivals (1,500 movements) from 450/900
- Loss of a high-volume Marine delivery facility on environmental grounds, but retention of a potentially damaging Beach Landing Facility, through all phases (construction, operation and into decommissioning).

5.2.30 KcCPC note the contents of this paragraph

KcCPC note the proposal that assorted highway works (dependent on the selected strategy) would "…start at the beginning of the early years…"

5.2.31 KcCPC note the contents of this paragraph

KcCPC note with considerable concern that starts for both Park and Ride facilities are being delayed by EDF Energy "…to reduce the early years construction impacts…because the early years workforce could be accommodated at the on-site car park.", a facility already criticised as being inordinately large. KcCPC believes that this proposal necessitates unnecessary vehicular movements (and the impacts resulting) were the Park and Ride capabilities on stream early.

KcCPC also note the 'catch all' inclusion of "…other highway improvements could also be started later to reduce construction traffic impacts in the early years…", potentially giving EDF Energy significant flexibility in undertaking disruptive highway improvements, presumably without further consultation or consideration of the direct and indirect impacts on residents, business, tourism and the environment.

5.3 Transport strategy for the construction workforce

a) Overall strategy

5.3.1 KcCPC note the content of the paragraph

KcCPC note with considerable concern that "we have considered what the effects of the project might be if the workforce figures were higher. To do this from a transport perspective, we have adopted a higher workforce figure in our transport modelling work. The modelling is based, therefore, on a larger workforce of 7,900 construction workers and 600 associated development operational workers." and although KcCPC agree that stress testing the base assumption is good practice, it is greatly concerned that recent events at Hinkley Point C may mean this is a provision being made by EDF Energy to deal with systemic 'workforce requirement' forecasting issues.

5.3.2 KcCPC note the contents of this paragraph

5.3.3 KcCPC note the contents of this paragraph

KcCPC note that EDF Energy make no mention of comments made at Stage 2 regarding the inordinately large car parking provision at the main site and concerns about EDF Energy's commitment to limiting all avoidable traffic movements.

5.3.4 KcCPC note the contents of this paragraph

5.3.5 KcCPC note the contents of this paragraph

KcCPC note and welcome the proposed measures to avoid further main site car parking and even more workers travelling direct to the main construction site. However, it regrets that these steps are not developed enough to reduce the Stage 2 main site parking proposal, considered too large by many people.

b) Location of the construction workforce

5.3.6 KcCPC note the content of the paragraph

c) Park and ride proposals

5.3.7 KcCPC note the content of the paragraph

5.3.8 KcCPC note the content of the paragraph

KcCPC note the forecast avoidance of construction worker traffic flows (…through the villages of Blythburgh and Westleton… Snape and Tunstall…) achievable by the provision of the Park and Ride. However, KcCPC remain unconvinced that these reductions can be achieved whilst the very large car parking provision at the main site remains.

5.3.9 KcCPC note the content of the paragraph

5.3.10 KcCPC note the content of the paragraph

5.3.11 KcCPC note the content of the paragraph

5.3.12 KcCPC note the content of the paragraph

KcCPC note "…many construction workers would simply switch to using the Darsham park and ride. This is because there would be a shorter total journey time to the main development site…" and wonder whether this assertion is evidenced or, is based on EDF Energy's understanding of the behaviours of their potential workforce demographic (perhaps by observation at Hinkley Point C?). Assuming it is the latter, is this indicative of a more general pattern of workforce; attitudes, behaviours and culture? Moreover, would this behaviour continue if the workforce were allocated specific Park and Ride routes?

5.3.13 KcCPC note the content of the paragraph

KcCPC note the inferred depth of detail and understanding in this paragraph, particularly in respect to the workforce behaviours were a Woodbridge or Martlesham location for the Southern Park and Ride decided.

Once again KcCPC wonder whether this assertion is evidenced or, is based on EDF Energy's understanding of the behaviours of their potential workforce demographic (perhaps by observation at Hinkley Point C?).

5.3.14 KcCPC note the content of the paragraph

Frequency and routing of park and ride buses

5.3.15 KcCPC note the content of the paragraph

KcCPC note that;

"…frequent services would operate during staff changeover and shift start/end periods and buses would depart **every ten minutes** to serve the expected **5,600 workforce**"

"…to give a robust assessment, we have modelled a bus departing each park and ride approximately every **six minutes**… sufficient capacity for the **assessment of the 7,900**"

and also, an **undefined**;

"…reduced skeleton service outside the modelled hours (0600-0900 and 1500-1900)."

KcCPC is very disappointed that the Stage 3 Consultation is peppered with ill defined or unquantified assertions that have a direct bearing on the impacts on residents, business, tourism and the environment.

5.3.16 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy (in the event that the Sizewell Link Road is built) to continue the use of the B1122 as a feeder route for (amongst other traffic) buses from the Darsham Park & Ride - "…travel on the A12 and use the new A12/B1122 roundabout…the buses would join the Sizewell link road via a new link west of Middleton Moor…" and wonder what the planned arrangement for minimum flow disruption will be employed?

KcCPC assume that EDF Energy can evidence Darsham Park & Ride buses can comfortably and safely integrated into the stream with Southern Park & Ride buses (already in stream) at **6 minute** intervals, HGV flow rates at up to one **every 32 seconds,** interspersed with irregular car, motorcycle and LGV flows?

KcCPC also note the intention of EDF Energy (in the event that the Sizewell Link is not built) to use the B1122 as the primary routing for all Park and Ride buses up to joining the Theberton bypass.

KcCPC note the Stage 3 Consultation remains silent on the return routing of Park and Ride buses to Darsham and Wickham Market and wonders why this fundamental element is missing?

5.3.17 KcCPC note the content of the paragraph

See comments at 5.3.16 (above)

Implementation of the park and ride strategy

5.3.18 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed measures to avoid abuse of main site car parking and even more workers travelling direct to the main construction site. However, it regrets that these steps are not developed enough to reduce the Stage 2 main site parking proposal, still considered (and at the time) too large by many.

5.3.19 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed controls for all but the unnecessarily large main site parking facility.

5.3.20 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed measures, but suggest that there are other things that should be explored to bolster compliance;

- Transponder technology to facilitate access and real time tracking ('home to work to home')
- Funding and licencing patrolling vehicle lifter(s) to remove offending vehicles to a pound and enable a rapid, deployable response to reports.

5.3.21 KcCPC note the content of the paragraph

KcCPC is disappointed that the park and ride strategy is not yet fully developed and deployed (by way of a live pilot) at Hinkley Point C.

d) Direct bus services

5.3.22 KcCPC note the content of the paragraph

KcCPC note that direct bus services are yet to be finalised, but that currently "the modelling work has been based on a half-hourly service from Ipswich and Lowestoft during staff changeover periods. A minibus service to and from Ipswich would also be provided outside of staff changeover periods for approved visitors to the construction site and for visitors to, and residents of, the accommodation campus.

The Leiston bus service would on average run every ten minutes during shift changeover and start/end times. However, the frequency would vary depending on the predicted demand during that period. Minibuses from Saxmundham train station would run hourly to coincide with scheduled train arrival and departure times."

KcCPC assume that to encourage higher usage, all of the foregoing bus services are on a 'free to use' basis?

5.3.23 KcCPC note the content of the paragraph

KcCPC note that direct bus services from Ipswich and Lowestoft will be using the A12 and following the routes to the main construction site described and used by the respective Park & Ride buses. It also notes that "…The local Leiston service would follow the B1069 to the main development site, serving the High Street in Leiston…"

5.3.24 KcCPC note the content of the paragraph

KcCPC notes "…modelling has continued to be based on 200 workers travelling to and from the construction site by direct bus from Lowestoft and Ipswich…and that, in practice, it may well be possible to move more workers in this way"

e) Total number of daily bus movements

5.3.25 KcCPC note the content of the paragraph

KcCPC notes "…EDF Energy has estimated that up to 650 daily bus movements (325 return journeys) could occur at peak construction. These figures combine both park and ride and direct bus movements…comprise larger buses providing park and ride services and the Leiston service… smaller mini-bus sized vehicles would be suitable for the services from Ipswich, Lowestoft and Saxmundham station"

f) Use of rail services by workers

5.3.26 KcCPC note the content of the paragraph

KcCPC note the strength of support at Stage 2 for a more ambitious rail scheme including the use of it for transporting construction workers to and from site. Support included "…Suffolk Preservation Society, Railfuture East Anglia and the Orwell Astronomical Society."

5.3.27 KcCPC note the content of the paragraph

KcCPC note "…a single large freight train can avoid in the order of 50 HGVs or 100 HGV movements on the local road network…" and the assertion that "…a limited proportion of the construction workforce is likely to live sufficiently close to a rail station…" and that "attractiveness of using rail for workers is likely to be further limited…frequency…slow journey time…compared to travel by car or bus… park and ride and direct bus services can be more easily timed and flexibly adapted".

5.3.28 KcCPC note the content of the paragraph

With regret KcCPC note that EDF Energy "will not be exploring further the use of rail to transport construction workers".

5.3.29 KcCPC note the content of the paragraph

g) On-site parking during construction

5.3.30 KcCPC note the content of the paragraph

KcCPC is concerned that a potential 2,000 avoidable vehicle movements (per day) continue to be championed by EDF Energy by way of a dogged determination to retain an inordinately high car parking capability at the main construction site.

KcCPC note that EDF Energy do not evidence any exploration of alternatives.

KcCPC can only conclude that this dogmatic approach is to protect retention of 1,000 car parking through construction into operation and presumably through decommissioning. In short, a long commitment to on-site parking.

5.3.31 KcCPC note the content of the paragraph

KcCPC note that EDF Energy have not only restated their commitment to 1,000 on site parking spaces, they have also advanced thinly veiled threats that an even larger capacity on-site car parking facility could be justified based on the:

a) "…impact of a larger 7,900 construction workforce…"

b) "…potential overlapping of car park demand based on the shift patterns"

c) an esoteric assertion that "…additional vehicles arising from the 'weekend effect' (where NHB workers arrive in single-occupancy vehicles)"

KcCPC remain of the view that avoidance of unnecessary vehicle movements should be a significant plank of EDF Energy's overall strategy for the construction, operation and decommissioning of Sizewell C and a fundamental consideration in developing proposals and policies.

5.3.32 KcCPC note the content of the paragraph

KcCPC is very concerned that EDF Energy are planning key infrastructure (i.e. Park & Ride facilities) will not be in place for the 'early years', but that on-site car parking at the Sizewell C site will be viable.

KcCPC believes that this further substantiates their view that EDF Energy are determined to achieve and maintain a minimum of 1,000 car parking spaces on-site from (or very near to) the get-go and are contriving circumstances and priorities to enable that to happen.

As a consequence, and in the interest of residents, business, tourism and the environment, KcCPC will be seeking assistance from the Planning Inspectorate when considering any application for a development order for Sizewell C, that impact avoidance measures (i.e. Park and Ride facilities) are in place, robustly managed and fully operational, prior to main site activity and other 'early years' provisions.

h) Walking, cycling and travel planning

5.3.33 KcCPC note the content of the paragraph

KcCPC note with regret that EDF Energy will only consider "…the scope to encourage workers living in the local area to cycle directly to the main development site." after completion of the Stage 3 consultation.

Moreover, KcCPC note EDF Energy's work will only "…assess the existing network of local cycle routes and identify how to enhance existing facilities, working within existing highway land…"

5.3.34 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy to develop a CWTP and within that to encourage "…walking or cycling to the construction site and park and ride facilities where practicable, as well as the scope for encouraging higher levels of car-sharing…"

In respect to car-sharing, KcCPC still hold the view that a more challenging regime (3+) should be adopted, achieving car sharing ratios similar to other significant UK businesses (i.e. British Gas, MBNA, M&S Financial Services, etc.).

5.3.35 KcCPC note the content of the paragraph

i) Summary

5.3.36 KcCPC note the content of the paragraph

KcCPC note the incomplete content of this paragraph and assume that 5.3.36 and 5.3.37 should be considered as one contiguous paragraph.

5.3.37 KcCPC note the content of the paragraphs 5.3.36 and 5.3.37 and have read them as a single entity.

KcCPC note that EDF Energy emphasise "…EDF Energy's transport strategy for the movement of the construction workforce would be to reduce significantly the scale of additional car traffic that would otherwise be generated on the local road network at peak construction." and whilst KcCPC acknowledge some steps have

been taken to reduce the number of car movements, in its considered view, were EDF Energy to be far more rigorous on traffic movement avoidance across Suffolk, an even greater reduction could be achieved.

5.3.38 KcCPC note the content of the paragraph in referring the reader to Chapter 6

5.4 Transport strategy for moving materials and freight

a) Introduction

5.4.1 KcCPC note the content of the paragraph

b) Marine-led strategy no longer proposed

5.4.2 KcCPC note the content of the paragraph replaying EDF Energy's position at Stage 2

"In the event that the rail and/or marine solutions, which remain EDF Energy's preferred strategy, prove to be impractical or not cost-effective EDF Energy may explore road-based scenarios for freight movement with appropriate mitigation of the resulting greater highway impacts that would arise."

5.4.3 KcCPC note the content of the paragraph

5.4.4 KcCPC note the content of the paragraph

5.4.5 KcCPC note the content of the paragraph

5.4.6 KcCPC note the content of the paragraph

5.4.7 KcCPC note the content of the paragraph

Although not mentioned in the preceding paragraphs, KcCPC assume that expert responders to the Stage 2 consultation have endorsed the conclusions of EDF Energy.

KcCPC look to EDF Energy to confirm their position, the position of expert responders and those of any statutory organisations, prior to the submission of any application for a development order.

5.4.8 KcCPC note the content of the paragraph

Although not mentioned in the preceding paragraph, KcCPC assume that expert opinions have been sought in respect to the proposal to install and operate a Beach Landing Facility.

KcCPC look to EDF to confirm their position, the position of expert opinion and those of any statutory organisations, in respect to the BLF, prior to the submission of any application for a development order.

c) Material quantities to be moved

5.4.9 KcCPC note the content of the paragraph

Material quantities estimated

5.4.10 KcCPC note the content of the paragraph

Material quantities for the construction of two UK EPR™ units and ancillary buildings and structures

5.4.11 KcCPC note the content of the paragraph

5.4.12 KcCPC note the content of the paragraph

KcCPC note that materials for the:

construction of the power station and supporting buildings total approximately 5.2 million tonnes comprising approximately 4 million tonnes for the main civil works, larger volume than at Stage 2

KcCPC note that due to spare capacity in the freight management model for utilisation of trains, no increase in the number of HGV's in the traffic modelling number for the rail-led strategy has been required.

The implication is that more HGV numbers will be required in the road-led strategy as a consequence of the growth in materials (referred to above). However, this is not confirmed in the paragraph**.**

5.4.13 KcCPC note the content of the paragraph

Material quantities for Sizewell C specific elements of the construction programme

5.4.14 KcCPC note there is no content at this paragraph

5.4.15 KcCPC note the content of the paragraph

KcCPC note the main construction items specific to Sizewell C are:

- site set up and infrastructure, including the access road, temporary and permanent crossings of the Site of Special Scientific Interest (SSSI) corridor, utilities and fencing;
- the accommodation campus;
- site offices and welfare;
- the green rail route into the main development site;
- the BLF for delivery of AILs during construction and operation;
- the cut-off wall required to support the earthworks/ excavation phase; and
- sea defences for the main development site.

5.4.16 KcCPC note the content of the paragraph

KcCPC note that estimates for these items largely "…remain provisional…" consequently, although not commented on by EDF Energy, KcCPC assume that transport forecasts are incomplete and therefore by implication the traffic model is not robust at the Stage 3 consultation

5.4.17 KcCPC note the content of the paragraph

KcCPC note that despite no robust estimates, "…using experience at Hinkley Point C…" EDF Energy currently estimate these elements would add "…a further 2.9 million tonnes to the total materials quantities required, comprising largely materials for concrete production and other building construction materials."

KcCPC question whether the level of preparedness of EDF Energy's thinking (that has a direct impact on traffic, and the connected impacts) at Stage 3 is sufficient for any application for a Development Order to be made without a further consultation round?

Material quantities movements during the earthworks phase

5.4.18 KcCPC note the content of the paragraph

KcCPC note that the current estimate of "…around 7.7 million tonnes of excavated material…" will need to be further refined as it is "…linked to decisions on building foundation depths and the precise location of the cut-off wall."

KcCPC is surprised that at the Stage 3 consultation, decisions on the foundation depth and location of the cut-off wall are still not firm enough to derive a firm estimate. As a consequence, KcCPC question whether the level of preparedness of EDF Energy's thinking (that has a direct impact on residents in the immediate area) at Stage 3 is sufficient for any application for a Development Order to be made without a further consultation round?

5.4.19 KcCPC note the content of the paragraph

5.4.20 KcCPC note the content of the paragraph

KcCPC note the "The quantity of fill material which could require importation is now estimated at around 2.2 million tonnes to balance the earthworks for the overall site." an increase on the position at the Stage 2 consultation.

KcCPC note that EDF Energy do not provide a transport impact (i.e. x,xxx additional HGV movements) arising from this increase. KcCPC note this is a shortcoming for other changes advised in the Stage 3 consultation. Is this a strategy to increase the opacity of the impacts of another series of changes, made between consultations?

In combination with the above, and in light of the recent experience at Hinkley Point C (in terms of workforce and traffic increases), KcCPC believes a further consultation should be undertaken prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

Total material quantities

5.4.21 KcCPC note the content of the paragraph and Table 5.2

KcCPC note the following since Stage 2:

24% increase (1.1 million tonnes) in Civils estimates
25% increase (0.3 million tonnes) in M&E Phase estimates
16% increase (0.4 million tonnes) in Sizewell C 'specifics' estimates
9% increase (0.2 million tonnes) in imported fill material

Overall an increase of 2 million tonnes (no attributable traffic impact in Table 5.2)

KcCPC calculate the traffic impact of this 2,000,000 tonne increase in estimates since the Stage 2 consultation (at say 29 tonne loads per HGV) as potentially another 69,000 deliveries or 138,000 HGV movements.

5.4.22 KcCPC note the content of the paragraph

KcCPC note "EDF Energy will continue to refine its estimates of the volumes and types of materials requiring transportation." and "…EDF Energy estimates that around 10 million tonnes of material would require transportation to the main development site over the construction phase."

However, taking EDF Energy's own figures from Table 5.2 KcCPC calculate the figure to be closer to **11 million tonnes** comprising:

5.6 million tonnes in Civils & M&E
2.9 million tonnes in Sizewell C 'specifics'
2.2 million tonnes in imported fill material

Overall 10.7 million tonnes

KcCPC calculate the traffic impact of this 700,000 tonne variance in estimates (at say 29 tonne loads per HGV) would potentially be 24,000 deliveries or 48,000 HGV movements.

In combination with the above, and in light of the recent experience at Hinkley Point C (in terms of workforce and traffic increases), KcCPC believes a further consultation should be undertaken prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

Material quantities arising from off-site associated developments

5.4.23 KcCPC note the content of the paragraph

KcCPC note that "In addition…the park and ride sites, rail and highways improvements…are currently estimated to be in the region of 300,000 to 400,000 tonnes" KcCPC calculate the traffic impact of just this 33% variance (at say 29 tonne loads per HGV) would potentially be 3,500 deliveries or 7,000 HGV movements.

As a consequence, KcCPC believes that "…more precise quantity will be included as part of the application for development consent." is an unconscionable position and instead must necessitate a further consultation prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

d) Use of Sizewell Halt or new rail siding in early years

5.4.24 KcCPC note the content of the paragraph

5.4.25 KcCPC note the content of the paragraph

5.4.26 KcCPC note the content of the paragraph

e) Heavy Goods Vehicles in the early years

5.4.27 KcCPC note the content of the paragraph

KcCPC note with concern that along with the unreadiness of key infrastructure for 'early years' EDF Energy forecast 300 HGV deliveries a day (600 movements), plus another 140 localised HGV movements along Lovers Lane, during the early years.

The details are not particularly clear, but KcCPC assume that the majority of the 300 HGV deliveries will emanate from the south and return in a southerly direction along the A12.

Assuming that this proposal advances, KcCPC want EDF Energy to use the opportunity to fully understand the 'real' impact of A12 use on a 'year-round' basis with a comprehensive and continuing impact analysis undertaken (noise, dust, air quality, etc.) through on-line monitors, at specific points in Kelsale cum Carlton:

1] **A12 immediate proximity** (Carlton Green, Curlew Green, Dorley's Corner, North Green West & Carlton Road East)

2] **A12 short distance propagation** (Kelsale Primary School, Kelsale Village Hall & Centre, Kelsale Church & Ronald Road Industrial Estate

3] **A12 mid distance propagation** (East Green South, Tiggins Lane, North Green East & Clay Hills East

All results to be available to KcCPC (and residents) in real time, on a free to view basis via the internet, made available to all residents by virtue of EDF Energy provided public access terminals in Kelsale School and Kelsale Village Hall & Centre.

The monitoring of results to form the basis of an ongoing dialogue between KcCPC and EDF Energy through construction, operation and potentially the decommissioning of Sizewell C.

The initial focus of the dialogue in the "early years" will be to agree impact mitigation measures to minimise the impact of EDF Energy traffic on the A12 and maintain and/or improve the environment for impacted Kelsale cum Carlton residents, businesses and ecology.

5.4.28 KcCPC note the content of the paragraph

KcCPC note with justifiable alarm the proposed level of HGV delivery traffic movements (under either a rail-led or road-led strategy) emanating from the South and travelling northward along the A12 from the J58 of the A14, and the reverse route for HGV's returning empty.

It also notes that the consultation omits any details of the routes being taken by HGV traffic bringing materials to a Freight Management Centre and the route for returning to their originating location. Therefore, KcCPC is not able to form a complete view of the wider traffic issues that Kelsale cum Carlton residents and businesses may encounter in; Suffolk, Essex, Cambridgeshire and elsewhere during the construction, operating and decommissioning periods.

Is EDF Energy's silence on these key considerations deliberate, or are they still awaiting an impact analysis?

Have discussions with SCC, ECC, NCC etc. taken place about the more widespread traffic impacts, particularly those in respect to HGV movements (delivery and returning journey's)?

KcCPC regard the absence of any information in regard to the HGV traffic discussed in the preceding comments as a fundamental flaw in the proposal being advanced by EDG Energy and would regard any application for a Development Order as premature.

Moreover, when and if this information is forthcoming, KcCPC believes that an additional consultation will be essential to comprehend the full impact of the Sizewell C development, operations and decommission.

5.4.29 KcCPC note the content of the paragraph

KcCPC note "EDF Energy's traffic modelling…the typical day is the focus…as this is most representative of the scale of impacts that could occur…" but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the 'median' (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.30 KcCPC note the content of the paragraph

KcCPC note "EDF Energy anticipates that in the rail-led strategy, …peak construction period there would be:

- an average of 225 HGV deliveries per day; and
- up to 450 HGV deliveries on the busiest day…."

but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the 'median' (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.31 KcCPC note the content of the paragraph

KcCPC note "EDF Energy anticipates that in the road-led strategy, peak construction period there would be:

- an average of 375 HGV deliveries per day; and
- up to 750 HGV deliveries on the busiest day…."

but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the 'median' (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.32 KcCPC note the content of the paragraph

KcCPC note the laxity with which EDF Energy appear to reference their traffic forecasts –

"…average HGV movements would be lower than the peak…"

"…figures are averages for a typical day…"

"…on any given day the number of HGV movements could be higher or lower…"

"On infrequent occasions…"

"…and on the busiest days…"

"…HGV movements could be up to twice the average…"

KcCPC note that HGV movements are a critical facet of the Sizewell C construction activity, and have a potentially devastating impact on the everyday life of: residents, businesses, the environment, air quality, tourism, economic growth, the transit road network and many other attributes beyond the SCDC boundary.

KcCPC regard the apparent absence of rigour in bringing forward easily understood, robust forecasts in respect to HGV traffic (discussed in the preceding comments) and thence potential impacts, as a fundamental flaw in the proposal being advanced by EDG Energy and would regard any application for a Development Order as premature.

Moreover, when and if this information is forthcoming (in full), KcCPC believes that an additional consultation will be essential to comprehend the full impact of the Sizewell C development and beyond into operations and through into decommissioning.

5.4.33 KcCPC note the content of the paragraph

KcCPC note the exactitude with which EDF Energy are able to provide robust forecasts of some HGV movements (i.e. Lovers Lane LEEIE to secondary site access) at the micro level;

- "…70 HGVs per day…in the rail-led strategy…"
- "…and 140 HGVs per day in the road-led strategy…"

proving that EDF Energy does possess the capability to make robust forecasts without condition or caveat.

KcCPC wonder why EDF Energy appear to have adopted such a cavalier approach at the macro level?

Is it perhaps that, the total HGV movements to construct Sizewell C could lie between 500,000 and 750,000 and by inference, the diesel mileage of HGV lorries on Suffolk Coastal roads could be enough to go to the moon and back over 30 times?

5.4.34 KcCPC note the content of the paragraph

5.4.35 KcCPC note the content of the paragraph

KcCPC is concerned that from a Freight Management Facility [FMF] on the A14 East of J58 or a FMF off of the Old Felixstowe road one of the earliest obstacles on the journey to the Sizewell C main site is navigating the roundabout at A14 J58.

This junction, in an appraisal conducted for the SDCD Final Draft Local Plan identifies

- the A14 J57 to J58 as having a high Volume/Capacity in both peaks [8:00-9:00 & 17:00-18:00]

- the A14 J59 to J58 as having a high Volume/Capacity in morning peak

- the A14 J58 having a high Volume/Capacity in both peaks at the junctions for traffic on the A14 eastbound using the left turn filter lane to the A12

- the A14 J58 has a high Volume/Capacity in both peaks at the A12 approach to the signalised roundabout.

Both the A12 approach and circulating roundabout flow are near capacity

Moreover, the A14 is over or near capacity around Ipswich (from Junction 53 to 58) in both peaks, so if laden HGV's approaching the FMF are routing by the A14 or the Northbound A12, they exacerbate the identified Volume/Capacity issues.

g) Impact of Light Goods Vehicle (LGVs)

5.4.37 KcCPC note the content of the paragraph

KcCPC again note the laxity with which EDF Energy appear to reference their LGV forecasts –

"it is anticipated that the construction phase would generate a significant number of lighter goods vehicles movements, i.e. vans and small delivery vehicles that weigh less than 3.5 tonnes. These light goods vehicle movements would be used for a wide range of purposes, including the delivery of post, packages, food, consumables, specialist tools and equipment and other small items. Vehicles in this category would also include contractor's fleet vehicles and visitors to the site."

5.4.38 KcCPC note the content of the paragraph

KcCPC note and welcome the adoption of a consolidation facility at the southern Park and Ride, as if properly managed it should

- eliminate a substantial number of LGV movements
- reduce 'rat running'
- reduce 'fly parking'
- reduce 'off A12' self-routing through country lanes
- make a small contribution to reducing traffic impacts

However, KcCPC note that many courier companies serving the north of Coastal Suffolk are Norfolk and Cambridgeshire originated (including Amazon).

KcCPC recommend that EDF Energy seek agreement with all of the UK's major courier and self-delivery companies that they, pre-consolidate deliveries to the Sizewell C main site, campus and camp sites, further reducing unnecessary delivery movements.

It may also be sensible to replicate Sizewell C consolidation capabilities at the northern Park & Ride.

5.4.39 KcCPC note the content of the paragraph

KcCPC note (assume) that despite the consolidation referred to at 5.4.38 (above), EDF Energy estimate a further(?) 700 LGV movements per day "…on the local road network at peak construction and this has been included in the modelling. This is in the order of three times the daily average number of LGV movements recorded during the peak period of Sizewell B construction. This increase on the Sizewell B figure reflects that Sizewell C has two UK EPRTM units, and also includes an additional allowance for the busiest days.

The figure is therefore a robust estimate for traffic modelling and transport assessment purposes. On many days and periods of the construction phase, LGV movements are likely to be substantially lower. Given the wide variety of project purposes to which these vehicle movements relate, these movements have been taken to occur throughout the working day and from a wide variety of locations using various routes."

KcCPC note the use of the term "…the local road network…" implying that EDF Energy are not going to enforce the use of the primary routes (A12) to Sizewell C by LGV traffic.

KcCPC seek urgent clarification on this point and wish to make it clear that it opposes the use of the local road network by 'self-routing' LGV traffic just as vigorously as it does HGV and workforce traffic.

KcCPC regard any unwillingness by EDF Energy to address the potential 'self-routing' issues of all Sizewell C traffic classes as an abrogation of its moral duty of care to; the environment, residents, businesses, tourists etc. who will have to 'manage' in spite of the known and quantified impacts of the primary routing (i.e. A12, B1122, bypasses).

However, to also have to 'manage' daily lives with uncontrolled non-HGV self-routing on "…the local road network…" has the potential to inflict untold long-term damage on the environment, residents, businesses, tourism etc.

KcCPC look to EDF Energy to come forward with rigorous controls to safeguard the greater Suffolk Coastal area against the damaging impacts foreseen above.

5.5 Justification for the differences in the proposals for the rail-led and road-led strategies

5.5.1 KcCPC note the content of the paragraph and Table 5.1

KcCPC note the assertions made by EDF Energy under this paragraph, particularly those points made in the two bulleted inclusions.

However, as with many assertions made throughout the Stage 3 consultation, the lack of detail or supporting evidence, even in a graphic representation, weakens the faith KcCPC places in the underpinning narrative.

KcCPC understands that EDF Energy may be unwilling to place detailed information in the public domain, particularly as the Hinkley Point C development seems to bring forward new instances of poor forecasting on a regular basis.

Nevertheless, KcCPC believes that development of assertions made by EDF Energy within the Stage 3 consultation, albeit on an indicative basis (and not substituting good solid data where available), would enhance understanding of some of the issues and allow a more constructive response than is currently the case.

5.5.2 KcCPC note the content of the paragraph

KcCPC note that there are marked differences between the rail-led and road-led strategies.

In respect to the Freight Management Facility, KcCPC is confused as to why the FMF is only applicable to the road-led strategy where:

- HGV traffic volumes range from 375 average at peak

but is not applicable to the rail-led strategy where:

- HGV traffic volumes go as high as 450 on busiest days

Surely marshalling freight carries benefits above a threshold, irrespective of the absolute numbers?

5.5.3 KcCPC note the content of the paragraph

a) Theberton bypass and Sizewell link road

5.5.4 KcCPC note the content of the paragraph

KcCPC note that EDF Energy has assessed the road traffic noise impacts on the B1122 under both the rail-led and road-led strategies (daily traffic volumes of 9,150 and 10,300 vehicles at peak construction - includes Sizewell C and general traffic.) It also notes the noise analysis showed impacts from traffic volumes in Theberton would, at times, be significant.

KcCPC note that whilst these results are clearly very concerning, EDF Energy does not indicate whether the results arise:

- solely as a function of traffic volumes
- as a result of the villages topology, and/or in combination with the traffic volume
- for another unique circumstance in Theberton
- as a result of the proximity of a proportion of premises to the road (and if so, what are the thresholds applied)

KcCPC also note that as well as noise "…other impacts in Theberton…" were mentioned as forming the basis of EDF Energy's decision to bypass Theberton.

KcCPC again point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach.

5.5.5 KcCPC note the content of the paragraph

In respect to Middleton Moor, KcCPC again note that, "In Middleton Moor the noise impacts under the road-led strategy would also be significant at times."

KcCPC note that whilst these results are clearly very concerning, again EDF Energy does not indicate whether the results arise:

- solely as a function of traffic volumes
- as a result of the villages topology, and/or in combination with the traffic volume
- for another unique circumstance in Middleton Moor
- as a result of the proximity of a proportion of premises to the road (and if so, what are the thresholds applied)

The outcome however is that EDF Energy have determined that Middleton Moor (and Theberton in place of the standalone bypass) will be bypassed by a Sizewell link road, should the road-led strategy be adopted.

KcCPC again point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach.

5.5.6 KcCPC note the content of the paragraph

b) Freight management facility

5.5.7 KcCPC note the content of the paragraph

In respect to the Freight Management Facility, KcCPC is confused as to why the FMF is only applicable to the road-led strategy where:

- HGV traffic volumes range from 375 average at peak

but is not applicable to the rail-led strategy where:

- HGV traffic volumes go as high as 450 on busiest days

Surely marshalling freight carries benefits above a threshold, irrespective of the absolute numbers?

KcCPC note the assertion by EDF Energy that "The lower number of HGVs required for the rail-led strategy could effectively be managed using the Electronic web based DMS." again KcCPC point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach. Surely providing the threshold/design limits for DMS would not have taken too much effort and in the opinion of KcCPC would have further bolstered the standing of the assertion.

c) Timing of Heavy Goods Vehicle movements

5.5.8 KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that provision of the Sizewell link road under the road-led strategy would result in a reduction in noise and vibration impacts benefitting residents alongside the A12 in Yoxford and on the B1122 in Middleton Moor and Theberton.

It also regrets that EDF Energy regard this as an opportunity to explore the extension of hours of operation of HGVs under the road-led strategy.

KcCPC also note that EDF Energy foresee the need for further noise assessment work would need to be undertaken in advance of the application for development consent at these locations, and at key points on the A12 such as Saxmundham, Marlesford and Little Glemham, in order to determine if extended hours of operation for HGV movements would be feasible.

KcCPC is appalled that within the Stage 3 documentation no consideration is given to residents of Kelsale cum Carlton at Mile Hill and North Green, who are directly impacted by the **'11th hour'** Sizewell Link Road proposal at Stage 3.

Moreover, KcCPC is aggrieved that they (Mile Hill residents) along with other Kelsale cum Carlton residents (adjacent to the A12) at; Curlew Green and Dorley's Corner, Carlton Road & Carlton Green have not been mentioned in terms of noise assessment or the impact of extended hours of operation.

It is clear that EDF Energy have taken a myopic approach to the Stage 3 Consultation and arrived at ill conceived, badly planned 'knee jerk' resolutions to complex issues that strike right at the heart of the soundness of their material delivery proposals for Sizewell C.

d) Improvements to the East Suffolk line

5.5.9 KcCPC note the content of the paragraph

KcCPC is very supportive of a rail-led strategy, but believes there is tremendous potential for a more ambitious approach than the Stage 3 proposals, based on heavier investment in enduring infrastructure, utilisation of night time movements, increased rail-head infrastructure at Leiston and broader discussions with both the rail operator (Greater Anglia) and Railtrack.

For example, have EDF Energy examined options with Greater Anglia including;

- Providing a southbound return shuttle train service between Lowestoft and Darsham
- Providing direct southbound travel via 'express' bus services between Darsham and stations to Ipswich
- Providing direct northbound travel 'express' bus services between Ipswich and all stations including Saxmundham to Darsham to pick up the northbound trains

A pedestrian link to Darsham Park and Ride could avoid congestion at Darsham station with turnaround buses.

Direct services from and to Darsham would avoid the problems associated with multi-drop 'rail replacement services'.

The size of buses providing services could be flexed to reflect destination demand, combined with service capacity at different times of the day (i.e. minibus, compact coach, coach and double decked buses).

KcCPC recognise that there would be an impact on average journey times, but believes correctly run these impacts could be minimised, whilst maintaining a valuable service up and down the Suffolk Coastal route.
In essence, this type of strategy could releas the Ipswich to Saxmundham track for further investment and use as a short to medium rail based 'materials artery' directly to the Sizewell main site and Sizewell Halt.

In suggesting this sort of approach, KcCPC understand they are open to criticism.

However, KcCPC believes that this type of thinking and open-mindedness is the only way to avoid the inevitable road crisis that will occur should; a Sizewell C road-led strategy, or even the currently proposed rail-led strategy be pursued.

KcCPC is mindful that a 'perfect storm' is building along the A14/A12 routes comprising:

- Sizewell C construction
- Increased signalisation of the A12
- Increasing Capacity/Volume A14 congestion
- SCDC's Local Plan 10,000 house building programme including Brightwell Lakes and Felixstowe and Saxmundham Garden Village initiatives
- Scottish Power Renewables Schemes (x4)
- SCDC's ambition for 'year round' tourism
- Increased commutes from SCDC Local Plan delivered housing to Martlesham, Ipswich & Felixstowe
- Traditional activity driven Felixstowe Port development
- The new RORO Felixstowe Port Developments

It is unconscionable to pursue individual strands of this outlook, without stepping back and examining the collective short and medium-term threats that they pose to; the environment, businesses, residents, visitors, and the health of individuals.

In the long term, KcCPC can visualise lasting damage being sustained to; infrastructure, flora, fauna and public health that may takes tens of years, if ever, to fully recover from.

Consequently, however unpopular, KcCPC feel it is incumbent on them to suggest what may currently viewed as unthinkable.

5.5.10 KcCPC note the content of the paragraph

See comments at 5.5.9 (above)

5.6 Management, monitoring and control of Heavy Goods Vehicles

a) Routes, timings and caps on Heavy Goods Vehicle movements

5.6.1 KcCPC note the content of the paragraph

KcCPC note that EDF Energy "expects the project to be subject to planning requirements that would control the average number of HGV movements allowed over a period of time."

KcCPC also note that EDF Energy expect "These requirements could limit the overall number of movements, to not exceed the average numbers during peak construction that have been used in the transport and environmental assessments."

KcCPC is concerned that were the HGV maxima applied in any planning requirement as high as the "average numbers during peak construction that have been used in the transport and environmental assessments"

there will be daily impacts to Kelsale cum Carlton residents close to the A12, that might potentially damage their health and mental well-being.

Assuming that the planning requirement is at or nearing the "average numbers during peak construction that have been used in the transport and environmental assessments", KcCPC insist EDF Energy gain a full understanding of the 'real' impact of A12 use on a "average numbers during peak construction" basis with a comprehensive and continuing impact analysis undertaken (noise, dust, air quality, etc.) through on-line monitors, at specific points in Kelsale cum Carlton:

1] **A12 immediate proximity** (Carlton Green, Curlew Green, Dorley's Corner, North Green West & Carlton Road East)

2] **A12 short distance propagation** (Kelsale Primary School, Kelsale Village Hall & Centre, Kelsale Church & Ronald Road Industrial Estate

3] **A12 mid distance propagation** (East Green South, Tiggins Lane, North Green East & Clay Hills East

All results to be available to KcCPC (and residents) in real time, on a free to view basis via the internet, made available to all residents by virtue of EDF Energy provided public access terminals in Kelsale School and Kelsale Village Hall & Centre.

The monitoring of results to form the basis of an ongoing dialogue between KcCPC and EDF Energy through construction, operation and potentially the decommissioning of Sizewell C.

The initial focus of the dialogue will be to agree impact mitigation measures to minimise the impact of EDF Energy traffic on the A12 and maintain and/or improve the environment for impacted Kelsale cum Carlton residents, businesses and ecology.

5.6.2 KcCPC note the content of the paragraph

KcCPC note that "The routes which HGVs can use, and the times at which deliveries can be made are also capable of being controlled via planning requirements and obligations. The appropriate use of such commitments is something which EDF Energy will be considering further prior to submission of the application for development consent." and will be seeking to ensure that the Planning Inspectorate use the full extent of their powers in this regard to safeguard the welfare and well-being of the environment, businesses, residents, visitors, and the mental and physical health of all individuals impacted, including other motorists on the Suffolk road network, EDF Energy employees and contractors.

b) Monitoring of Heavy Goods Vehicle deliveries

5.6.3 KcCPC note the content of the paragraph

KcCPC note that "EDF Energy is proposing to adopt a range of measures to manage and control HGV movements to and from the main development site. This includes the implementation of an electronic web-based DMS. All contractors receiving and delivering goods and materials by HGV would be required to operate and participate in the DMS. Through this system, agreed deliveries to the site would be booked in advance and allocated to agreed delivery slots within the day." KcCPC is unfamiliar with the capability of 'DMS' but notes that in the event a Rail-led strategy were proposed no FMF would be constructed and HGV deliveries would be direct to the Sizewell Main Site.

KcCPC also note that nowhere in the Stage 3 consultation is there any mention made of mitigating potential off route parking/lay-up by HGV drivers arriving 'in area' ahead of the delivery slot. How does EDF Energy intend to eliminate such practices?

KcCPC note that EDF Energy expect; "The system would provide a means of recording HGV deliveries to the site, ensuring that such deliveries are operating within any agreed controls and limits. It would also help to facilitate rapid electronic communication with suppliers in the event of any accidents, incidents or other project events that could lead to HGV deliveries being delayed or rescheduled."

In the event of a significant HGV route closure and in the absence of the FMF, how does EDF Energy propose to handle HGV traffic already on or approaching the A14/A12 Ipswich area?

At peak times, the number of HGV vehicles impacted could be significant, and not readily accommodated on some of the A12 stretches and/or even able to be turned around with ease.

In the context of the above comments, KcCPC also note the final sentence, that "…as well as reducing the requirement for external holding of HGVs on the local road network…" and is concerned by the inference.

5.6.4 KcCPC note the content of the paragraph

KcCPC is unclear exactly what EDF Energy's intent is in respect to a DMS as it says:

"This includes the implementation of an electronic web-based DMS."
and
"EDF Energy has developed a DMS that is now operational for the Hinkley Point C…"
and
"this and other similar projects would inform the design and development of the DMS for Sizewell C"
and
"A similar system is, for example, operating for the management of container HGV movements to and from Felixstowe Port. It has proved effective…"

KcCPC understand that none of the above are mutually exclusive and that understanding what options are deployable is valuable.

However, at Stage 3 consultation KcCPC would expect EDF Energy to explain more readily their ambitions for the DMS they are looking to employ/deploy.

5.6.5 KcCPC note the content of the paragraph

KcCPC note and welcome the intention of EDF Energy to "…manage HGV deliveries to site using ANPR and/or Radio frequency identification (RFID) technology…to monitor and control the movement of HGVs on agreed routes" but are concerned at the implication of "…the movement of HGVs on agreed **routes**"

5.6.6 KcCPC note the content of the paragraph

KcCPC note the further information in regard to ANPR based systems and also that EDF Energy have an ANPR system operational at Hinkley Point C.

It is also noted that "Learning and experience from the operation of the Hinkley Point C system would continue to be incorporated into the procedures adopted for Sizewell C." unfortunately, EDF Energy make no comment on their experiences and the effectiveness of the Hinkley Point C implementation.

5.6.7 KcCPC note the content of the paragraph

KcCPC note the further information in regard to RFID based systems and their use in combination with communication between EDF Energy and suppliers.

KcCPC is interested whether EDF Energy have considered a RFID implementation in respect to LGV and workforce traffic movement monitoring and the safeguarding of the local road network against 'rat running', 'fly parking' and other potentially damaging driver behaviours?

5.6.8 KcCPC note the content of the paragraph

KcCPC note that "EDF Energy is committed to achieving a high level of compliance with agreed project controls in this area and to promptly addressing any breaches in compliance were they to occur." and consequently anticipates EDF Energy looking at potential LGV and workforce traffic implementations sympathetically.

KcCPC also note that "Further details of EDF Energy's proposed approach to the management of HGV movements to and from the site will be set out in a Construction Traffic Management Plan (CTMP). The development of the CTMP will be progressed in consultation with SCC." and therefore KcCPC anticipate that SCC will also reflect on the opportunities afforded by RFID in dealing with potentially damaging LVD and workforce driver behaviours and the subsequent impact on the broader Suffolk roads network and the attendant communities and residents.

c) Incident management

5.6.9 KcCPC note the content of the paragraph

KcCPC note that, despite the A14/A12 being consistently (in the major part) proposed throughout the Sizewell C consultations as EDF Energy's routing for Sizewell C traffic, at this late stage "EDF Energy **anticipates** putting in place several approaches to address an incident or accident preventing normal timely access to the main development site via the agreed HGV routes.". KcCPC anticipated that, because of the sub-optimal nature of the A12 as a primary routing for the anticipated volume of HGV, LGV, Bus and car traffic associated with Sizewell C construction, EDG Energy would have already accumulated enough information to enable the full development of comprehensive and implementable Incident Management Policies and Procedures.

To not have done this going into Stage 3 of the consultation, seems to KcCPC, a grossly unsatisfactory position that must be remedied (and consulted on) prior to any application being made for a Development Consent Order.

To permit an application to be made without these vital safeguards having being scrutinised, is tantamount to dismissing the importance of residents, businesses, tourists and visitors being able to go about their daily lives without fear of encountering impediment at every turn.

In noting "This would include the development and implementation of communication procedures with the police, SCC and Highways England to give early identification or warning of any incidents/accidents or events which could prevent normal smooth access to the site via the approved routes. Depending on the nature and location of the incident, a range of alternative approaches may be adopted, including:

- following identification of an incident of concern, rapid communication would be made with suppliers to delay, reschedule or hold en-route planned HGV deliveries to the site;
- following identification of an incident of concern, HGV deliveries would be held at the FMF or the southern park and ride site;
- for deliveries already en-route, agreed diversionary routes would be used where the normal agreed route to site is unavailable, e.g. due to an accident;
- the southern park and ride facility at Wickham Market includes a Traffic Incident Management Area (TIMA) for holding HGVs in the event of an incident on the local highway network or the main development site (refer to Chapter 14 of this volume). The TIMA is required for both the rail-led and road-led strategies;
- the temporary holding at, or controlled release of, HGVs from the Sizewell C site, where these HGVs have already delivered goods and are ready to make their return journey; and
- the use of part of the LEEIE, which includes space for a holding area for HGVs, in the limited circumstances where direct access to the site may be temporarily unavailable."

KcCPC is forced to conclude that EDF Energy have applied little thought to the 'real-life' circumstances that readily occur as a result of the inordinate intensification of traffic on a route that will still comprise:

moderate lengths of single and dual carriageway, numerous embedded HGV deceleration/acceleration points, increased junction signalisation, several sections of single carriageway with descents/ascents, several 'cross flow turning' road junctions, etc.

Instead, the focus appears more closely aligned with what the first paragraph regards as "…putting in place …approaches to address an incident or accident preventing normal timely access to the main development site via the agreed HGV routes."

KcCPC also note within the text, phrases that cause grave concern and need more explanation, specifically:

"…incidents/accidents or events…" – KcCPC would like to understand exactly what EDF Energy mean and what distinguishes; an incident from an accident, from an event

"…an incident of concern…" – KcCPC would like to understand what one of these is, as opposed to, presumably 'an incident of no concern'

"…agreed diversionary routes…"– as this is a Stage 3 consultation, KcCPC is particularly concerned that there appears to be no consideration of what these might be.

As there do not seem to be any proposals coming forward in Stage 3 regarding potential "…agreed diversionary routes…", KcCPC is gravely concerned that EDF Energy may be deliberately with-holding any proposals they have developed, lest they are as inflammatory as the 'left field' proposal of a Sizewell Link Road coming forward at this late stage.

5.6.10 KcCPC note the content of the paragraph

KcCPC consider that "EDF Energy will further develop strategies for incident management in consultation with SCC, Highways England, the police and other emergency services. Key elements of the proposals and approaches would be set out in a Traffic Incident Management Plan (TIMP) for the construction phase." is totally unsatisfactory for the foregoing reasons (see 5.6.9 above) and urge the Planning Inspectorate to bear this in mind when and if they consider an application for a Development Consent Order.

5.7 Summary of Sizewell C traffic impacts and mitigation

5.7.1 KcCPC note the content of the paragraph

KcCPC note the comments of EDF Energy in respect to congestion on the A14/A12 route and conclude that they understate the issues. For example, omitting mention of the A14/J58 with the A12, Martlesham Heath, etc.

KcCPC also note that EDF Energy position themselves as a non-contributor to pre-existing issues (identifying them as the responsibility of SCC as the local highway authority) and thereby presumably, absolving themselves of any responsibility for exacerbating congestion, even with the forecast inordinate increases in HGV, LGV, Bus and workforce car movements.

KcCPC does not know whether these assertions are correct either in terms of; remit, legality or ownership, but find the attitude disingenuous and perplexing.

Whether the Planning Inspectorate are able to redress a seemingly inequitable position through their planning remit remains to be seen, but for a considerable portion of Coastal Suffolk's population the ramifications of Sizewell C being approved on the basis of the current consultation condemns them to 10 years or more of potential purgatory.

5.7.2 KcCPC note the content of the paragraph

KcCPC note the comments of EDF Energy in respect to the B1122 operating "…well within its…traffic carrying and environmental capacity…" and thereby find it even more astounding that EDF Energy have chosen to force a new Sizewell Link road through farming land and wildlife habitat, rather than making step improvements in the B1122.

5.7.3 KcCPC will deal with the 'Reference Case' and 'With Sizewell C' comparisons in their response to Chapter 6.

a) Peak construction

5.7.4 KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that "…Theberton bypass under the rail-led strategy or Sizewell link road under the road-led strategy, serve to not only remove through-traffic from the B1122…" which is stated in 5.7.2 (above) to be "…well within its…traffic carrying and environmental capacity…".

It further notes the EDF Energy assertion that the Sizewell Link will also "draw traffic away from other local routes through Leiston, Saxmundham and Tunstall." KcCPC remain unconvinced in respect to the assertion made about Tunstall traffic being drawn by the proposed Sizewell Link and welcome the opportunity to have sight of unequivocal evidence.

It is also noted that EDF Energy understand that a "…road-led strategy would result in more traffic overall than the rail-led strategy," but assert that "…traffic would be lower in Yoxford (on both the A12 through the village and on the B1122) and Westleton."

It seems perverse that EDF Energy are proposing a strategy that sees such a significant increase in overall traffic using the A12, and then in the same paragraph seeks to justify this damaging increase, by raising the spectre of lower traffic in Yoxford and Westleton.

5.7.5 KcCPC note the content of the paragraph

KcCPC note the assertion that "Some routes would experience substantial increases in HGV and bus flows during Sizewell C construction, though in many cases the existing flow is very low and the total daily flow with Sizewell C traffic would not cause capacity issues." and in the absence of any of the "Some routes" being specifically identified by EDF Energy, are unable to make any comment.

KcCPC believes that unsubstantiated assertions like this one, made by EDF Energy at Stage 3 of a consultation are unhelpful and do not act in the public interest.

KcCPC also note that "EDF Energy recognises however that the effects of increased HGV and bus movements on the environment are important factors to be considered and these are discussed in the relevant PEI chapters in Volume 2."

5.7.6 KcCPC note the content of the paragraph

KcCPC note the assertion by EDF Energy that "would remove all Sizewell C-related traffic from these villages, along with a significant amount of existing traffic." and believes categorical claims to be, fanciful at best, misleading empty promises at worst.

Moreover, claims regarding "would remove…existing traffic" are overly optimistic as unlike EDF Energy traffic, other traffic is something over which EDF Energy are unable to exert any control.

However, it does raise the issue as to how EDF Energy propose to deal with a traffic incident that closes the proposed bypass? Presumably given the assertion (above), no EDF Energy traffic would reroute through Farnham and Stratford St Andrew?

5.7.7 KcCPC note the content of the paragraph

Specifically, KcCPC note "…there are no other locations where the addition of Sizewell C peak construction traffic necessitates mitigation…".

However, KcCPC notes that in EDF Energy's modelling of traffic flows, no consideration has been given to increases in traffic volumes occasioned by seasonal tourism. KcCPC recognises that the DoT's Transport Appraisal Guidance (TAG) indicates weekend and holiday periods should be avoided when undertaking an analysis.

However, recognising that Suffolk and the East Suffolk coast particularly, are significant tourist destinations, is it not in the interest of the public, SCC, East Suffolk Council and EDF Energy to fully understand the seasonal variations, allowing for realistic Sizewell C construction planning and appropriate mitigations to be put in place?

5.7.8 KcCPC notes that EDF Energy recognise the addition of Sizewell C construction traffic will see "…**Many locations** assessed would likely experience…re-routing of non-Sizewell C traffic…".

5.7.9 KcCPC notes that EDF Energy believes that "In most of these locations, the re-routed traffic volume is small…". however, as neither the "many locations" or their respective quantifications are included in the consultation, KcCPC remain unconvinced by the assertion, and call for EDF Energy to bring forward compelling evidence in support of their assertion.

5.7.10 KcCPC notes that despite the assertion that "…there are no other locations where the addition of Sizewell C peak construction traffic necessitates mitigation…" at 5.5.7 (above), EDF Energy conclude that "Some locations would experience a higher level of rerouting, particularly the single-carriageway stretch of the A12 at Woodbridge…".

Against this back-drop, KcCPC find it difficult to understand when EDF Energy consider the level of predictable re-routing high enough to warrant mitigation, let alone the unforeseen consequences that will invariably arise during such a protracted period of disruption.

KcCPC call upon EDF Energy to be transparent and provide full disclosure on the impact of construction traffic along; the A14 corridor from the westerly Suffolk county border, the A12 corridor from Colchester in the South through to the A14 J58, the A12 from A14 J58 north to Sizewell C, from Lowestoft south to Sizewell C and the local road network surrounding the A12 – to the costal boundary in the East and the East Suffolk boundary to the West and North.

b) Early years

5.7.11 KcCPC note that "During the early years of Sizewell C construction, re-routing would also likely occur in some locations where congestion is already present in the Reference Case, for example on the A12 at Woodbridge."

KcCPC believes that in order to maintain a degree of control over the only significant north/south route through East Suffolk (and thereby the surrounding road network), it is pragmatic and necessary to insist that the EDF Energy construction traffic route(s) and associated infrastructure are in place prior to the initiation of any construction work at the Sizewell C Main Site.

5.7.12 KcCPC further note that EDF Energy intend that "Prior to completion of the mitigation proposals the construction traffic associated with the project would use existing routes through Farnham and Stratford St Andrew, Theberton and Yoxford. Although the construction workforce would be much smaller than at peak construction, meaning fewer worker trips and HGV deliveries to the main development site, there would be HGV deliveries to the associated development construction sites (park and rides, bypasses and junction improvements) and these trips would have significant impacts before the schemes are completed." As a result, KcCPC believes it may be necessary to further restrict EDF Energy and apply restrictions, such that all necessary works are delivered serially (or in parallel where sensible) northward on the A12, opening up the final 'construction' route step-by-step to all traffic. Similarly, the same restrictions should apply for construction work north and coming south to the Sizewell C main site.

5.7.13 KcCPC note the content of the paragraph

Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.14 KcCPC note the content of the paragraph

Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.15 KcCPC note the content of the paragraph

Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.16 KcCPC note the content of the paragraph

5.8 A road-led or a rail-led strategy?

5.8.1 KcCPC note the content of the paragraph

KcCPC note with grave concern the commentary provided by EDF Energy in this paragraph.

KcCPC note the attribution of "urgent" to Sizewell C, arising from the 2011 NPS EN-1.

KcCPC note that in 1.3.4 "…the need for new nuclear power remains significant…" and that "important that there is a strong pipeline of new nuclear power projects".

However, as with any project or programme, KcCPC is very aware that the three prime levers available to influence the outcome are temporal, fiscal and qualitative.

Consequently, KcCPC views the last paragraph; "If the necessary improvements cannot be delivered in time, EDF Energy could not adopt the rail-led strategy. Equally, if the timescale for the necessary rail improvements cannot be committed to with certainty, adopting the rail-led strategy would risk the potential that necessary transport mitigation would not be in place in time to serve the project and we would be obliged to revert to delivery by road without having invested in the necessary infrastructure to support that strategy (in particular the Sizewell link road or the FMF)." as injecting a huge temporal imbalance into the programme. An imbalance that realistically can only be off-set by increasing the fiscal case or risking huge qualitative risk.

Judging by EDF Energy's concluding words, it seems that the choice they wish to exercise is a decline in the qualitative position; at the cost to East Suffolk resident's health and well-being, the ecology of East Suffolk, visitors and businesses in the area and potentially the projects deliverables.

KcCPC believes this to be the wrong approach, and were such a circumstance to arise it would be insistent that the Planning Inspectorate look very carefully at the broad implications and if necessary, make reference to the Government prior to making formal any recommendation.

5.8.2 KcCPC note the content of the paragraph

KcCPC note that "The rail-led strategy offers advantages for the bulk delivery of construction materials and we are continuing to pursue it closely with Network Rail. It would come at a cost, however, and we currently estimate that the rail-led strategy could involve an extra £80m of cost compared with the cost of providing the infrastructure for the road-led strategy."

However, KcCPC believes EDF Energy are being disingenuous in suggesting that a rail-led strategy carries a 'price tag' of "an extra £80m of cost compared with the cost of providing the infrastructure for the road-led strategy."

KcCPC has formed this view on the basis that the proposed road-led strategy is a stripped to the chassis de minimis solution that carries a huge degree of risk, most of which is going to be borne by East Suffolk residents, businesses, visitors and ecology.

Notwithstanding the above, KcCPC is clear that the option that reduces the impact of Sizewell C construction on; East Suffolk residents, businesses, visitors and ecology is a considerably more ambitious rail-led strategy, utilising in combination; the Green Rail Route, extending the Sizewell C main site railhead capacity and extending the capacity of the Sizewell Halt terminus.

KcCPC recognise that to achieve such a step change may necessitate previously unexplored options such as: more daylight deliveries, night trains, a dual track branch line, an agreement with Greater Anglian to run a

Lowestoft-Darsham shuttle, with express bus services provided to all stations south of Darsham, thereby releasing capacity on the Ipswich-Saxmundham line, etc.

KcCPC believes that; in the absence of a viable sea route, inadequate investment in A12 improvements and/or a direct Sizewell site road route, a much more ambitious rail-led option is essential, despite it still having impacts on many people throughout the Suffolk Coastal area.

5.8.3 KcCPC note the content of the paragraph and Figure 5.1

5.8.4 KcCPC note the content of the paragraph and Tables 5.3 & 6.2

KcCPC wish it to be noted that Table 5.3 is unclear and potentially open to mis-interpretation.

5.8.5 KcCPC note the content of the paragraph and Table 5.4

In the opinion of KcCPC, Table 5.4 is a vast simplification of the impacts that will be felt along the line of the A12 from A14 J58 in the south and Lowestoft in the north (including congestion propagation into the surrounding road networks).

Moreover, it omits to identify any wider road network issues on the A14 west of Ipswich and the A12 south of Ipswich arising from inbound HGV deliveries.

5.8.6 KcCPC note the content of the paragraph

KcCPC is concerned that the terminology used in this paragraph is incorrect, particularly:

"As explained earlier in this chapter, average HGV movements would be 225 per day under the rail-led strategy and 375 under the road-led strategy, with the differences greater again in the busiest days"

KcCPC believes it should read (as per table 6.1):

As explained earlier in this chapter, average HGV **Deliveries** would be 225 per day (450 movements) under the rail-led strategy and **375 Deliveries** (750 movements) under the road-led strategy, with the differences greater again in the busiest days

5.9 Next steps to inform the Transport Assessment

5.9.1 KcCPC note the content of the paragraph

5.9.2 KcCPC note the content of the paragraph

5.9.3 KcCPC note the content of the paragraph

KcCPC note the inference that all numbers provided by EDF Energy thus far will be subject to further change, prior to submission to the Planning Inspectorate.

In that connection KcCPC is intrigued how the selection of a rail-led or road-led option will significantly change the car volumes as per "…freight mode split for the rail-led and road-led strategies in order to inform the resultant car, LGV and HGV traffic volumes…".

Perhaps EDF Energy could advise all consultees of the correlation?

5.9.4 KcCPC note the content of the paragraph

KcCPC at this stage would have expected "The programme of mitigation implementation …refined to further reduce, mitigate and then manage the impacts of construction traffic on the highway network during the early years of the project's construction."

In contrast to a rather modest ambition to "…mitigation implementation will be considered and refined to manage the impacts of construction traffic on the highway…" which implies little more will be achieved!

5.9.5 KcCPC note the content of the paragraph

5.9.6 KcCPC note the content of the paragraph

6. Traffic Modelling (Volume 1, Pages 108 to 157)

6.1 Introduction

a) Overview of traffic modelling

6.1.1 KcCPC note the content of the paragraph

KcCPC is concerned that Traffic Modelling is seemingly not being undertaken for:

1] Sizewell C - Operational Phase impacts

2] Sizewell C – Outage & Maintenance impacts

3] The combined Sizewell B & C Outage & Maintenance impacts with 3 reactors live on site

6.1.2 KcCPC note the content of the paragraph and Figure 6.1

6.1.3 KcCPC note the content of the paragraph

KcCPC is concerned that the EDF Energy VISUM traffic model 'reference case' is being treated as a 'black box' with no specific referencing of what is included and what is excluded, and the underpinning rationale.

This is particularly concerning as there is a significant programme of work in the pipeline in East Suffolk, much of which currently active. Moreover, the aspirations of Waveney and SCDC (combining to form East Suffolk) for the construction period also have an impact, as identified in the respective Local Plans.

This issue typifies a thread of opacity that runs throughout the Stage 3 consultation and is highly regrettable at such an important point in the process.

6.1.4 KcCPC note the content of the paragraph

b) Derivation of traffic flows

6.1.5 KcCPC note the content of the paragraph

6.1.6 KcCPC note the content of the paragraph

KcCPC whilst able to deal with the conceptual treatment of HGV & Park and Ride traffic (i.e. FMF to Sizewell C, returning to A14 J58) are less clear how the treatment of LGV and workforce cars are treated. (i.e. destination known…but origin assumptions?). The latter is of course critical to communities adjacent to the A12 as they often interface a wider areas traffic as a gateway to the A12.

Why have EDF Energy chosen to keep this critical information from impacted communities?

6.1.7 KcCPC note the content of the paragraph Figure 6.6

KcCPC is concerned that seemingly there is no direct monitoring of the A12 traffic flow between Point U at Farnham and Point Y at Yoxford, despite the current daily average declining from 18,900 (Point U) to 14,700 (Point Y).

As a consequence, KcCPC cannot comprehend how EDF Energy can give a robust portrayal of daily traffic flows on the upper A12 between these two points, let alone along its length.

6.1.8 KcCPC note the content of the paragraph

Please refer to comments at 6.1.7 (above)

c) Chapter structure

6.1.9 KcCPC note the content of the paragraph

6.2 Without Sizewell C' traffic modelling

6.2.1 KcCPC note the content of the paragraph

6.2.2 KcCPC note the content of the paragraph and Figure 1

a) Base traffic model

6.2.3 KcCPC note the content of the paragraph and Figure 1

b) Reference case traffic model

6.2.4 KcCPC note the content of the paragraph

Please refer to comments at 6.1.3 (above)

6.2.5 KcCPC note the content of the paragraph

Please refer to comments at 6.1.3 (above)

6.2.6 KcCPC note the content of the paragraph

KcCPC is interested to note that:

"…modelling conducted thus far does not suggest future traffic growth up to the time of Sizewell C peak construction would lead to a significant change in traffic conditions across the local road network, or to material detrimental effects in the form of significant increases in journey times or deterioration in junction performance."

KcCPC is concerned that the preceding paragraphs make no reference to the methodology for determining journey times and junction performance, focussing instead on flows. Why are these important facets not made clear?

Moreover, evidence in SCDC's Local Plan Evidence seems to contradict these assertions, particularly in respect to the approaches to the the A14 J58 junction with the A12, and the flow congestion on the roundabout. Why is this?

6.2.7 KcCPC is concerned that EDF Energy are seemingly prepared to; commentate on pre-existing or forecast (i.e. modelled) unsustainable congestion in specific areas (i.e. Woodbridge), recognise that the additive impact of Sizewell C will do nothing but exacerbate the problem and then presumably wash their hands of any responsibility for the future?

KcCPC recognise that the responsible Highway Authority has a significant role to play going forward. However, this ostensibly 'maverick' approach to future compounding impacts on residents, businesses, tourists and other parties, does not seem like that of 'considerate neighbour' seeking to establish sound relationships for the long term.

6.2.8 KcCPC is again concerned that EDF Energy once again resort to being a commentator in respect to the SCC outline business case "for major improvements along sections of the A12, known as the Suffolk Energy Gateway scheme (SEGway) (Ref. 6.1). The strategic case sets out that SCC recognises congestion as an issue on single carriageway sections of the A12 close to Woodbridge and that it considers this could be resolved through largely online improvements." but should perhaps be more concerned with what the compound impacts of the business case falling would be, on not only residents, businesses, tourists and other parties, but

also on EDF Energy's ability to deliver to a plan. Perhaps EDF Energy's 'Sizewell C Risk Log' could attest to their contingent plans?

6.2.9 KcCPC note the content of the paragraph

Please refer to preceding comments (above)

c) Modelled time periods

6.2.10 KcCPC note the content of the paragraph

6.2.11 KcCPC note the content of the paragraph

6.2.12 KcCPC note the content of the paragraph

KcCPC is perplexed by the phrasing of this paragraph, particularly reference to "as well as periods when there are expected to be higher volumes of Sizewell C development-related traffic". As the project owner, project planner, traffic modeller and author of the Stage 1 to 3 Consultation, KcCPC had anticipated EDF Energy would know when higher volumes of Sizewell C development-related traffic would occur? Is this not the case?

6.2.13 KcCPC note the content of the paragraph

6.2.14 KcCPC note the content of the paragraph

6.2.15 KcCPC note the content of the paragraph and Figure 6.2

KcCPC note the inclusion of the bar chart at Figure 6.2. However, without any metric or scale, the illustration is totally meaningless. It is alarming that with a wealth of data available, the modelling is reduced to a chart of such ineptness.

6.2.16 KcCPC note the content of the paragraph

KcCPC note the total lack of respect shown to the potential audience in the construction of this paragraph

"Both highway network traffic flows, and those associated with Sizewell C construction, are lower at weekends than on weekdays during the "neutral months" of April – June and September – October that are used in traffic modelling. Therefore, effects and mitigation are assessed from the weekday modelling results. The variation of traffic flows during the Summer is described later in this chapter."

KcCPC regard the content of the paragraph as being contrived to provide as little clarity as possible.

6.2.17 KcCPC note the content of the paragraph

KcCPC note the assertion that "The combination of the use of these modelling time periods and data, along with traffic growth assumptions for the reference case model, means that the traffic model is reflecting the existing traffic volume on the network and the future traffic conditions which could apply by the time of Sizewell C construction." However, it believes that this is misleading, as any model can only aim to simulate the current (which can be tested for accuracy by observation) and potential conditions.

To reflect (i.e. replicate) future traffic conditions, is something that can only be tested after the event.

Does EDF Energy have evidence that the model created for Hinkley Point C has; from inception of construction, through to the present day been wholly accurate? If it has not been accurate, what degree of variance has been experienced?

d) Sizewell B outage

6.2.18 KcCPC note the content of the paragraph

KcCPC presume "So that the future year assessments are robust, trips generated by these periodic Sizewell B outages have been incorporated in all future year (reference case and with development) modelling scenarios." Refers only to the Sizewell C construction period, as presumably 'In Operation Years' will have to deal with 3 rolling Outage cycles (i.e. Sizewell B, C (A reactor) and C (B Reactor)?

6.2.19 KcCPC note the content of the paragraph

6.2.20 KcCPC note the content of the paragraph

e) Network seasonality

6.2.21 KcCPC note the content of the paragraph

6.2.22 KcCPC note the content of the paragraph

KcCPC is concerned that two different assertions are made in respect to the pre-Stage 2 analysis undertaken, neither of which contain any quantification, instead using terms such as "…daily traffic flows in August are broadly similar to those in May).

KcCPC note that the first assertion omits the A12 (presumably amongst others), whilst the second assertion omits the A14 (again, presumably amongst others). KcCPC suggest that this leaves both assertions open to accusations of being misleading and/or potential misinterpretation.

Throughout the Stage 3 Consultation documents, EDG Energy continue to make assertions unaccompanied by suitable evidential data, instead referring out to different paragraphs, chapters, sections or omitting any substantiating evidence at all.

6.2.23 KcCPC note the content of the paragraph and Figures 6.3 and 6.4

KcCPC is disturbed at the level of unnecessary obfuscation employed by EDF Energy in paragraphs 6.2.23 and 6.2.24, rendering both paragraphs virtually unfathomable to anybody but a VISM analyst.

As for Figures 6.3 and 6.4, it is somewhat tenuous to assert that comparisons between two months constitute trends (*Trend definition - A pattern of gradual change in a condition, output, or process, or an average or general tendency of a series of data points to move in a certain direction over time, represented by a line or curve on a graph.*).

6.2.24 KcCPC note the content of the paragraph and Figure 6.2

See comments at 6.2.23 (above)

In respect to Figure 6.2, the reader is left in no doubt that "Analysis has shown that this is the busiest weekday during May, as Figure 6.2 shows." but once again EDF Energy have failed to put any quantitative evidence on the figure, adjacent to it, or even refer out to a source data set.

See comment at 6.2.2 (above) regarding the omission of substantiating evidence and quantifications.

KcCPC wish to understand what "around 85% of the workforce would be present on any given Friday and around 50% on a Saturday" specifically in respect to the 50% on Saturday, does this mean 50% at work, or 50% at work or on campus or 50% on campus…or another qualification?

6.2.25 KcCPC note the content of the paragraph

KcCPC note "DfT Transport Analysis Guidance (TAG) advice (Ref. 6.2) that the assessment of highway traffic effects should be based on neutral periods, i.e. weekdays during neutral months, avoiding weekends and holiday periods". However, KcCPC believes that unlike some more urban areas during weekends and holiday periods, the Suffolk Coastal area (as a day trip and holidaying destination) does see significant increases in day tripper and tourist traffic, which should reasonably be taken into consideration in the EDF Energy traffic

modelling activity. Not to do so may lead to inordinate delays to all traffic types (including EDF Energy construction traffic) during good weather and traditional holiday periods.
KcCPC note the assertion made by EDF Energy that "Furthermore, the application for development consent relating to Hinkley Point C presented similar findings in terms of network seasonality, in that specific roads were shown to have slightly higher flows at certain times of the day during Summer months, but the development was not assessed with these increased existing flows." but does not believes that this constitutes a prevailing precedent. KcCPC remains confident that an applicant to the Planning Inspectorate, might reasonably be expected to have explored the impacts of seasonal variance in an area where both day and extended stay tourism comprises such a significant part of the locality's economy.

6.2.26 KcCPC note the content of the paragraph

KcCPC note "the Sizewell C-related traffic flows reported at this Stage 3 consultation incorporate a larger construction workforce in combination with the peak number of HGV deliveries which in reality would be unlikely to coincide with the peak workforce."

KcCPC note 'early years' events at Hinkley Point C and in the absence of substantiating evidence are unconvinced by the reassurances made here.

6.2.27 KcCPC note the content of the paragraph

KcCPC maintain that current seasonal traffic associated with day trip and longer stay tourism is due to expand annually through to 2036, as year-round tourism initiatives outlined in the SCDC Final Draft Local Plan take effect.

6.2.28 KcCPC note the content of the paragraph

KcCPC note "a wide geographic area, including all potentially affected parts of the road network;" is included in the Stage 3 Consultation.

However, the extent of the revised modelling does not appear to be clearly identified in the Stage 3 Consultation documents, excepting a large geographic area described at **Figure 6.1**.

If **Figure 6.1** does indeed describe the extent of the revised modelling, it seems unlikely that the extent of the modelling would extend beyond (in the main) those routes identified as 'A Roads', presumably intensifying to cover 'B Roads' approaching the A12 coastal area.

KcCPC note "the busiest periods of the day and the busiest days of the week for Sizewell C traffic generation;" is included in the Stage 3 Consultation, but does omit consideration of weekends and holiday periods.

KcCPC draw attention to the comments made at 6.2.25 (above) regarding seasonal variations.

KcCPC note "modelling which incorporates both general future traffic growth across the network and the specific traffic associated with major developments expected to come forward by the time of Sizewell C early years and peak construction phases." is included in the Stage 3 Consultation, but does omit consideration of weekends and holiday periods.

KcCPC again note that, the specific inclusions and those excluded (under traffic associated with major developments) are not detailed by EDF Energy, making the checking of the integrity of the modelling foundation difficult to ascertain.

6.2.29 KcCPC note the content of the paragraph

6.2.30 KcCPC note the content of the paragraph

6.3 Traffic modelling of the Sizewell C peak construction phase

6.3.1 KcCPC note the content of the paragraph

KcCPC note the baseline Sizewell workforce of 5,600 and a further 500 at associated works, has been adjusted to maxima of 7,900 and 600 respectively for the purpose of modelling transport.

6.3.2 KcCPC note the content of the paragraph

6.3.3 KcCPC note the content of the paragraph

a) HGV Delivery profile

6.3.4 KcCPC note the content of the paragraph and Figure 6.5

KcCPC again note that the Figure 6.5 is open to misinterpretation and does not have numbers of HGV's, using instead "Percentage of HGV deliveries".

6.3.5 KcCPC note the content of the paragraph

KcCPC again note the vagueness relating to the road-led HGV movement profile making any accurate analysis difficult, if not impossible "This profile is defined for the rail-led strategy. In the road-led strategy, with more daily HGV deliveries, there is potential for the hours of delivery to be extended beyond 20:00, though this would not alter the daily traffic flows reported in this chapter".

KcCPC note "…there is potential for the hours of delivery to be extended beyond 20:00, though this would not alter the daily traffic flows reported in this chapter…" and are concerned that this may be misleading, insofar as if the daily movements remain constant, but the hours of operation change - then the delivery pattern may vary, potentially modifying the impact on roads, residents, businesses, tourists, nocturnally active mammals and birds.

b) Car sharing

6.3.6 KcCPC note the content of the paragraph

KcCPC once again restate the view that EDF Energy's commitment to reducing workforce car traffic impact is derisory. EDF Energy should be embracing a positive commitment to a 'greener working' car sharing policy targeted at achieving an overall average between 2.5 and 3.

A 1.1 average for workers attending the main site from a Home Base represents no car sharing policy. KcCPC regard 0.1 being achievable solely through worker pragmatism and self-interest.

The following links are provided to assist EDF Energy in finding a better car sharing arrangement.

https://www.nidirect.gov.uk/articles/car-sharing

http://www.slough.gov.uk/parking-travel-and-roads/car-sharing-and-pooling.aspx

https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/service.page?id=hYs6xxESzRo

http://www.greensuffolk.org/travel/journey-planning/car-sharing/

6.3.7 KcCPC note the content of the paragraph

KcCPC once again restate the view that EDF Energy's commitment to reducing workforce car traffic impact is derisory. EDF Energy should be embracing a positive commitment to a 'greener working' car sharing policy targeted at achieving an overall average between 2.5 and 3.

An average of 2 per car represents very little challenge to EDF Energy, particularly as they have so many levers available to them (i.e. individual contracts, the likelihood of co-located workers, secure car parking, etc.), indeed EDF Energy themselves note that Sizewell B exceeded 2 without compunction.

KcCPC would like to see EDF Energy taking a 'win, win' stance on car journey reduction, reducing parking at the main site and simultaneously rewarding co-worker groups undertaking to carry 3+ people by them qualifying for main site parking.

The necessary checks could be undertaken by gate security and those not wishing to comply would still have the park and ride service available, perhaps operating the lower thresholds suggested by EDF Energy at Stage 3 Consultation.

The following links are provided to assist EDF Energy in finding a better car sharing arrangement.

https://www.nidirect.gov.uk/articles/car-sharing

http://www.slough.gov.uk/parking-travel-and-roads/car-sharing-and-pooling.aspx

https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/service.page?id=hYs6xxESzRo

http://www.greensuffolk.org/travel/journey-planning/car-sharing/

6.3.8 KcCPC note the content of the paragraph

Please refer to comments made 6.3.6 and 6.3.7 (above)

c) Non-work related travel by NHB workers

6.3.9 KcCPC note the content of the paragraph

6.3.10 KcCPC note that "…non-work related leisure trips…" applicable to NHB workers are included in all the traffic analysis "…based on national travel statistics relating to leisure related trips" and wonder whether EDF Energy's extensive Hinkley Point C experience confirms the modelling assumptions?

In either circumstance what are the anticipated impacts?

d) Weekend travel by NHB workers

6.3.11 KcCPC note the content of the paragraph

KcCPC note that "NHB workers, who would live in the local area temporarily during the construction phase, are anticipated to travel from and to their permanent homes at the beginning and end of the working week…" and wonder whether EDF Energy's extensive Hinkley Point C experience confirms the modelling assumptions?

In either circumstance what are the anticipated impacts and temporal limits, outbound and inbound?

6.3.12 KcCPC note the content of the paragraph

KcCPC note the complexity of modelling given the different work shift patterns.

Nevertheless, KcCPC would like to understand the nature and periodicity of individual work patterns and what the anticipated impacts are of each with regard to the 'weekend effect'?

6.3.13 KcCPC note the content of the paragraph

e) Visitors

6.3.14 KcCPC note the content of the paragraph

6.3.15 KcCPC note the content of the paragraph

Are the assumptions (presumably only in part) evidenced at Hinkley C?

f) Assessment basis

6.3.16 KcCPC note the content of the paragraph

KcCPC is interested to understand:

1] How robust 'early years' modelled forecasts for Hinkley Point C have proven?

2] What percentage variance is there between forecast and actual (favourable or detrimental)?

3] What changes have been made to methodology and modelling techniques as a result?

4] What is the current likely forecast variance for EDF Energy's Sizewell C modelling?

5] What tracking of modelling forecasts are in place at Hinkley Point C?

6] What tracking of modelling forecasts are to be in place at Sizewell C?

7] What contingency is planned to mitigate adverse variances to forecasts (Hinkley Point C and Sizewell C)?

8] What are the thresholds for triggering mitigations to adverse variances to forecasts?

KcCPC note "the number of HGV deliveries per day is based on the assumption that only around 80% of the proposed number of trains may be achieved, in both rail-led and road-led strategies. If the full five trains per day (rail-led) or two trains per day (road-led) were achieved, the number of HGVs required per day would likely be lower." and would like to understand the projected range of the HGV delivery reductions arising under both the rail-led and road-led options.

6.3.17 KcCPC note the content of the paragraph

Please see comments at 6.3.16 (above) in connection with the scale of the potential HGV delivery reductions arising under both the rail-led and road-led options.

6.3.18 KcCPC note the content of the paragraph and Section 6.4

KcCPC will make comment on Section 6.4 when appropriate

6.4 Peak construction traffic effects across the modelled area

6.4.1 KcCPC note the content of the paragraph

KcCPC note that in the VISUM Traffic Model "…existing and development related traffic within the model can re-route to choose the best available routes…" and are interested to understand the degree to which the model reflects typical driver behavioural patterns and whether re-routing is enacted autonomously in reaction to simulated traffic flows? Or whether an algorithmic parameter model determines re-routing patterns and/or triggers threshold-based re-routing.

In any circumstance, KcCPC would like to know the reviewed performance of the Hinkley Point C modelling when compared to observed behaviours?

6.4.2 KcCPC note the content of the paragraph and references out to Table 6.2 & Figure 6.6

KcCPC note that "…modelling conducted to date also suggests that an amount of non-Sizewell C traffic would potentially re-route…" but that EDF Energy do not substantiate the assertion with the projected amount of self-re-routing applicable to the A12 element of the model and/or the surrounding road networks.

KcCPC would like to understand the 'delta(s)' modelled by EDF Energy and any applicable probability of them occurring, and under what circumstances.

Table 6.2 KcCPC notes Table 6.2 and its contents.

KcCPC is concerned that as provided, Table 6.2 does not provide sufficient enough data to enable a full understanding of the existing traffic flow, the journey maps within it, any assumptions made about (or observed compositions of) flow mix and hence the behaviour of individual and collective flow elements. Consequently, KcCPC is unable to agree or disagree the assertions being made by EDF Energy regarding the forecast impact of Sizewell C construction traffic.

Amongst other concerns, KcCPC is unclear what assumptions have been made regarding component traffic elements, whether queueing algorithms have been applied and whether the degree of change to a flow pattern is materially impacted when HGV elements are injected into the flow in the densities forecast at peak construction times.

KcCPC is also concerned that, there appears to be no traffic flow data between Location U (A12 Farnham) and Location Y (A12 Yoxford), despite this A12 segment being proposed as the site for entry to the proposed Sizewell Link Road.

KcCPC wonder whether this omission is symptomatic of the undue haste obvious elsewhere in the proposal of a new route for a Sizewell Link Road, and the paucity of sound data associated with its proposal.

6.4.3 KcCPC note the content of the paragraph

6.4.4 KcCPC note the content of the paragraph and Table 6.1

6.4.5 KcCPC note the content of the paragraph

Despite the claim that "As identified in Table 6.2 the majority of locations would likely experience some re-routing of non-Sizewell C traffic, when the Sizewell C traffic is added." It is by no means clear to KcCPC that this is the case or that any of the subsequent assertions are sufficiently evidenced.

Once again KcCPC is forced to conclude that Table 6.2 is unnecessarily opaque (to the layman) and therefore not sufficiently clear to discharge the responsibilities of EDF Energy under this consultation.

Moreover, because of some of the previously identified short comings in the Stage 3 consultation documents (i.e. in respect to figures, evidence and clarity, etc.), KcCPC is forced to conclude this is by design and not by accident.

6.4.6 KcCPC note the content of the paragraph

KcCPC remain unconvinced by traffic modelling claiming to be accurate to one decimal place i.e. "…Tunstall (location H) the re-routing of non-Sizewell C traffic is slightly greater at 3.4%" whilst the narrative remains so loose "…is due to some existing traffic previously travelling through Snape and Tunstall on this road to the A12 at Wickham Market now joining the A12 further north as a direct result of the two-village bypass provision."

The former element of the assertion here seems at odds with logic, insofar as traffic routing via Snape and (then) Tunstall is southbound "…to the A12 at Wickham Market…", thereby increasing the traffic flow at Tunstall.

Whilst the latter portion asserts that traffic elements are "joining the A12 further north", implying the affected traffic flow is northbound.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.7 KcCPC note the content of the paragraph

KcCPC note that whilst "3.4%" and "150 vehicles" are absolutes used at 6.4.6 (above), the immediately adjacent paragraph states "…it is only possible to identify that the traffic increases would lie somewhere within the quoted range." KcCPC wonder which is the correct position of the EDF Energy's traffic modelling activity? KcCPC also note that, "In practice, only part of the traffic might re-route, or none at all." leading it to conclude that EDF Energy's traffic modelling is certainly not 'science' and therefore any suggestions of levels of re-routing should be treated as pure speculation. In reality, re-routing is determined by individuals in vehicles, sometimes in an instant!

Further KcCPC note in respect to the A12 at Woodbridge "…already congested in the reference case, without the addition of Sizewell C traffic, which results in a more substantial level of potential re-routing away from this route with the project-related traffic included, at 1,900 vehicles per day or about 4.7% of the existing flow." and question exactly what is portrayed by "…at 1,900 vehicles per day or about 4.7% of the existing flow."?

Mathematically, 4.7% of the existing traffic flow at Location AA (37,800) is 1,776.6, whilst 1,900 vehicles is 5% of 37,800.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.8 KcCPC note the content of the paragraph and Table 6.2

KcCPC is once again forced to question whether Table 2 has clearly and unequivocally reported "…under the road-led strategy the majority of locations are predicted to experience some potential re-routing of non-Sizewell C traffic and the volumes re-routed would be greater in more places than under the rail-led strategy. In most of these locations, the re-routing would not be noticeable as they are less than 5% of daily flows."?

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.9 KcCPC note the content of the paragraph and Table 6.2

KcCPC note that assertions that are made regarding the level of re-routing at locations A (Lovers Lane), C (Saxmundham Road, Leiston), I (Saxmundham), R (B1122 Yoxford), Y (A12 Yoxford) and AA (A12 Woodbridge).

In light of the narrative used by EDF Energy in the foregoing paragraphs (of 6.4) and the observations made (by KcCPC) for the same paragraphs, KcCPC is forced to conclude that it has no confidence in these numbers that supposedly "…demonstrate a more substantial level of re-routing under the road-led strategy (greater than 5% of daily flows)" when there is no evidence presented as to the origins and/calculations underpinning them.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.10 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.11 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.12 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.13 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

6.4.14 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

However, through the widespread experience of Councillors and Kelsale cum Carlton resident, KcCPC is aware of the Woodbridge issues raised in this paragraph.

Consequently, whilst KcCPC agree that SCC must play some part in making improvement measures, it does not agree that EDF Energy can place all of that burden solely on SCC.

As a project Sizewell C is directly responsible for adding a considerable volume of traffic (with a significant heavy, slow-moving element) to the A12, over a considerable number of years. Consequently, KcCPC believes it must be beholden on EDF Energy to play a fuller part in alleviating the problems of its creation, including congestion exacerbation.

6.4.15 KcCPC note the content of the paragraph and Table 6.2

The truisms of EDF Energy in respect to the Two Village and Theberton bypasses whilst undeniable, barely constitute a valuable legacy capable of offsetting the huge unresolved issues by their use of the only significant north/south route available in the eastern coastal Suffolk area.

The reality is, the majority of access to Sizewell C is via a 30+ mile route comprising:

- a badly congested roundabout on the only trunk road in the County (J58 A14)
- up the de-trunked A12, the only significant north/south route serving all of the East Suffolk coastal area…
- …and all of the communities and tourist attractions therein…
- …comprising significant single carriageway elements…accessed by largely unclassified rural roads and lanes…
- …onto a 'B' road (B1122) passing through or adjacent to villages and rural communities…
- …leading directly to a network of largely unclassified rural roads and lanes

Whereas in contrast, the Hinkley Point C journey is one of less than 20 miles, where the core HGV route (circa 18 miles) is:

- from a modern key route, in the form of the M5
- via the A39
- taking in a bypass opened in 2015
- and thence onto the local route into Wick Moor Drove

6.4.16 KcCPC note the content of the paragraph and Table 6.2

KcCPC note the EDF Energy assertion that "There are no locations where the increase in daily traffic volume generated by the project construction causes the road capacity to be exceeded." yet research conducted in connection with the Suffolk Final Draft Local Plan (and available on the Evidence Base) states:

1] The A14 main carriageway between J57 & J58 has a high V/C in both peaks
Potentially impacted further by inbound HGV traffic going to the FMF or Sizewell C direct

2] the A14 main carriageway from J59 to J58 westbound has a high V/C in the AM peak
Potentially impacted further by outbound HGV traffic from the FMF at Innocence Farm

3] A14 J58 has a high V/C in both peaks at the junction for traffic on the A14 eastbound using the left turn filter Lane to the A12
Potentially impacted further by inbound HGV traffic going to Sizewell C direct and or accessing an Old Felixstowe Road FMF

4] A14 J58 has a high V/C in both peaks at the A12 approach to the signalised roundabout. Both A12 approach and circulating roundabout flow are near capacity
Potentially impacted further by inbound HGV traffic going to an Old Felixstowe Road FMF, HGV traffic exiting an Old Felixstowe Road FMF bound for Sizewell C, empty HGV traffic leaving the Suffolk Coastal area after Sizewell C delivery, Sizewell C bound HGV traffic from an Innocence Farm FMF, Sizewell bound LGV and workforce car traffic

5] A14 J53 to J58 eastbound is over or near capacity in both peaks
Potentially impacted further by inbound HGV traffic going to either FMF site or Sizewell C direct, Sizewell bound LGV and workforce car traffic

6] V/C values are relatively high along the A12 from the A14 (J58) to Woodbridge. The worst affected junctions are the A12 roundabouts at Woodbridge.
Impacted by all Sizewell traffic entering the Suffolk Coastal area from the A14 J58 and/or A12 junctions south of and up to Woodbridge

7] The A14 main carriageway is shown to be approaching capacity (V/C 85-99%) in both directions between J57 (Nacton) and J59 (Trimley St. Martin).
Potentially impacted further by inbound HGV traffic going to an Innocence Farm FMF and subsequently leaving an Innocence Farm FMF and using the J59 roundabout to circulate back westbound to reach Sizewell C via A12.

The report also notes that "…improvements in capacity through the removal of bottlenecks whilst desirable in one location can have knock on impacts which would be less desirable than the existing congestion. For example, as traffic is more freely able to move into the network, the problem will simply move to another location. Equally, hard engineering and infrastructure solutions are not the only solutions available. Other solutions involve the optimisation of existing infrastructure and an emphasis on sustainable transport, through for example personal travel planning."

EDF Energy do not appear to have addressed any of the issues raised by this report (1 to 7 above), nor are they taking steps to 'bake in' personal travel planning (via challenging car share policies) as mentioned in the last sentence (above).

KcCPC is interested to understand the degree to which EDF Energy have modelled the 'knock on impacts' underlined above, when examining the potential impacts of the proposed programme of road changes accompanying the Sizewell C construction programme. There appears to be little or no comment in the Stage 3 consultation on this point, whether the action is being taken by EDF Energy and/or SCC.

KcCPC also note that, there is a planned intensification of signalisation at roundabouts on the A12 below Woodbridge and wonder what impacts EDF Energy have modelled as a consequence?

6.4.17 KcCPC note the content of the paragraph and Table 6.3

Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.3 without absolute quantification of the number of movements, not just %age increases, delivers a clear picture of the impacts that will be felt on the ground.

6.4.18 KcCPC note the content of the paragraph, Table 6.3, Table 6.2 and Figure 6.5

KcCPC note the assertion that "…Sizewell C-related construction traffic is relatively well spread across the day." but contest the accuracy of it, perhaps not in absolute terms but specifically in respect to HGV movements whereby Figure 5 seems to portray in excess 50% (three hours in excess of 17% per hour) of all HGV delivery movements being made between 7:00am and 10:00am.

Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes that Table 6.3 without absolute quantification of the number of movements, not just %age increases, delivers a clear picture of the impacts that will be felt at the locations used by EDF Energy.

6.4.19 KcCPC note the content of the paragraph, Table 6.4 and Table 6.5

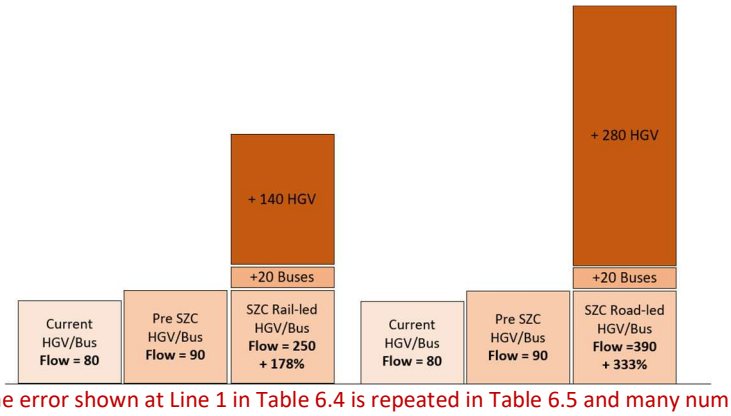
Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

For example, rather than this (complete with incorrect calculations):

Table 6.4 Peak period of Sizewell C construction – changes in HGV and bus flows (typical day) at the locations identified in **Figure 6.6**

Location	Current daily HGV and bus flow	Pre-Sizewell C daily HGV and bus flow	Sizewell C buses (rail-led)	Sizewell C rail-led HGV	With Sizewell C rail-led daily HGV and bus flow	% increase	Sizewell C buses (road-led)	Sizewell C road-led HGV	With Sizewell C road-led daily HGV and bus flow	% increase
Lover's Lane, Leiston (location A)	80	90	20	140	250	178%	20	280	400	344%

Why not:



Note: The same error shown at Line 1 in Table 6.4 is repeated in Table 6.5 and many numbers appear broadly similar.

6.4.20 KcCPC note the content of the paragraph

6.4.21 KcCPC note the content of the paragraph

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation.

The use of "…the two largest proportionate increases in HGV and bus flow occur…" and a long rambling explanation regarding Lover's Lane seeks to distract attention away from the huge numbers impacting elsewhere.

Similarly, whilst going to extraordinary lengths to demonstrate the impact on the B1122 of HGV and Bus traffic increases and the potential benefits (sic) of the Sizewell Link road, EDF Energy do not even think to mention the impacts on the A12 communities of the growth on the southern approach from the A14 J58 right through to Yoxford.

6.4.22 KcCPC note the content of the paragraph

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation.

In this case EDF Energy feel it necessary to commit virtually a whole paragraph to defending what might appear to be a "…substantial…" proportionate increase in "…from a low base…", further reassuring readers that it would "…not cause the road capacity to be exceeded."

The content of previous pages, as well the current paragraph does little to reassure the reader of the consistency and integrity of the EDF Energy approach, to the portrayal of the true impacts of increased traffic on the whole Suffolk Coastal area.

6.4.23 KcCPC note the content of the paragraph and Table 6.2

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. Barely any mention is made of journey times, average A12 flow speed, flow deceleration/acceleration into and out of junctions, roundabouts, signalisation impacts, etc.

KcCPC note that little comment is made of the significant change in flow composition on the A12 after Sizewell C construction commences, and the impacts of that change in each segment of the A12 between A14 J58 and the B1122 at Yoxford.

KcCPC once again are forced to express their concern at the quality of the narrative and the opacity of numbers used (or inferred) by EDF Energy in the Stage 3 consultation documentation.

6.4.24 KcCPC note the content of the paragraph and Tables; 6.2, 6.5, 6.6 to 6.11

a) Traffic increases on the B1122

6.4.25 KcCPC note the content of the paragraph

6.4.26 KcCPC note the content of the paragraph

KcCPC note that despite the obvious shortcomings of the A12 route beyond the end of the Wickham Market dual carriageway, EDF Energy have manifestly failed to identify and deal effectively with the issues.

Instead, the Stage 3 consultation sees EDF Energy seemingly agreeing their proposal of the B1122 at Stage 2 was flawed.

However, rather than taking a more considered view, EDF Energy have now elected to bring forward two alternative 'band-aids' to an already proven inappropriate route:

- firstly, a poorly conceived 'Link Road' that brings the larger portion of total traffic movements unnecessarily far north, before turning it back south and into the second…
- …a single village bypass at Theberton that will neither appease the village or improve the journey to the Sizewell sites at Leiston.

KcCPC note that EDF Energy believes that should it go ahead; Coastal Suffolk residents will embrace the 'Link Road' as a lasting legacy of the Sizewell C construction.

Quite why EDF Energy believes that the loss of up to 120 hectares of good agricultural land will be celebrated by the residents of a predominantly rural area, when in its place they receive the blessing of a 'Link Road' from nowhere to nowhere is totally unfathomable.

6.4.27 KcCPC note the content of the paragraph

KcCPC note that EDF Energy propose to use the B1122 in the event of the link road becoming unavailable, from which it becomes evident the EDF Energy envision using the B1122 as a resilient route for all traffic types, presumably even if the closure of the Link Road is for a prolonged period.

KcCPC wonder how much reassurance this provides the villagers along the route of the B1122.

Once again KcCPC is forced to express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

6.4.28 KcCPC note the content of the paragraph

Once again KcCPC is forced to express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

6.4.29 KcCPC note the content of the paragraph

KcCPC is concerned that the South Bound traffic flow along the B1122 and then at Middleton Moor routing onto the Sizewell Link to join the North Bound traffic flow from the A12, will disrupt the Link Road flow and/or lead to waiting traffic queueing on the eastern portion of the B1122.

Why has EDF Energy not published data demonstrating the ability of the Link Road to absorb and integrate both traffic flows – particularly important as the Middleton Link Road junction is portrayed as a T junction.

KcCPC is also interested to understand how the reverse journey will be accommodated, requiring as it does the crossing of the oncoming A12 traffic flow?

The latter comments (above) also apply to the treatment of the proposed revised B1125 junction with the Link Road.

6.4.30 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself as a 'veil' for "flows increase significantly …but the road capacity would not be exceeded".

6.4.31 KcCPC note the content of the paragraph

6.4.32 KcCPC note the content of the paragraph

b) Traffic increases on the A12

6.4.33 KcCPC note the content of the paragraph and Tables 6.8 and 6.9

Once again KcCPC express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

KcCPC is especially unclear as to the precise meaning of the comment made by EDF Energy "…and the alternative routes offered by the proposed mitigation, at various locations." and seek direct referencing to the appropriate points on the Tables 6.8 and 6.9.

KcCPC note the repeated discontinuity of data between Location U (Farnham) and Location Y (Yoxford) without any explanation.

6.4.34 KcCPC note the content of the paragraph and Tables 6.8 and 6.9

KcCPC is not sure that the following points "…can be noted from the figures in Table 6.8 and 6.9" without additional data being available, however;

KcCPC note the assertion that "illustrate that existing and predicted future traffic flows on more southerly sections of the A12 are significantly higher than flows on the A12 at more northerly locations…" but wonder what EDF Energy are trying to infer in making it?

Again, KcCPC note the assertion that "the predicted increase in traffic arising from wider economic growth and development unrelated to Sizewell C is broadly similar to the effect related to Sizewell C…" but wonder what EDF Energy are trying to infer in making it?

KcCPC note the assertion that "…There is some evidence that non-Sizewell C traffic would choose other routes to avoid delay in this area, irrespective of whether Sizewell C goes ahead or not." but once again, no evidence is included with the assertion, referenced out, or seemingly within the Stage 3 consultation document pack.

6.4.35 KcCPC note the content of the paragraph

c) Traffic increases elsewhere

6.4.36 KcCPC note the content of the paragraph

6.4.37 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "…the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

6.4.38 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "…South of Yoxford…" by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

6.4.39 KcCPC note the content of the paragraph

KcCPC note the EDF Energy comment that "west of the Seven Hills roundabout (location S), a large volume of Sizewell C-related trips is expected including a significant proportion of HGVs. However, the Sizewell C traffic is a very small percentage of the existing traffic levels and is not expected to exceed the capacity of the junction."

Assuming that the junction referred to is A14 J58, KcCPC is concerned that Sizewell C related traffic (delivery & returning empty will indeed take the A12 southbound approach and circulating flows to or beyond capacity.

Taking into account other planned East Suffolk activity (close proximity housing developments, wind power-based initiatives, Felixstowe expansion of traditional container business, the RORO development, 2 x international cable-link initiatives, SCDC 'year round tourism' initiative etc.) and there can be no doubt that capacity of not only the A14 J58, but also the whole A12 will be near or over capacity.

The impacts on Suffolk Coastal area; residents, businesses, tourism and ecology will be very damaging and mental health as well as general well-being may be severely impacted, particularly in communities on or adjacent to the A12.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment.

Whilst KcCPC can understand why EDF Energy might wish to understate the impacts of the Sizewell C construction, it continues to be surprised at the 'arrogance' of the Stage 3 consultation, seemingly placing the importance of the Sizewell C development ahead of even the most basic of considerations for the people of the Suffolk Coastal area.

What is manifestly clear, is that EDF Energy believes that NPS's and the current state of the UK nuclear programme have strengthened their hand in respect to the Sizewell C development and that as a consequence they can be more audacious, bringing forward expedient proposals, rather than considered, well developed ideas.

d) Summary

6.4.40 KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes the detrimental impacts of Sizewell C construction activity on Coastal Suffolk's transport infrastructure has been "significantly reduced by the embedded mitigation included within the proposals set out in this Stage 3 consultation…" the implication being that, EDF Energy intend to take all the necessary steps to avoid, mitigate and compensate those impacted by the development.

EDF Energy draw particular attention to the actions they have included in their Stage 3 proposals to make good on the intent above:

"…campus reducing journeys to work…" KcCPC note the reluctance to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements

"…direct bus services…" KcCPC hope that EDF Energy have considered an alternatively fuelled bus fleet to reduce diesel pollution in Leiston, Lowestoft, Saxmundham, Ipswich, along the A12 and on the surrounding road network where used. If not, why not?

"…park and ride…" KcCPC hope that EDF Energy have considered an alternatively fuelled bus fleet to reduce diesel pollution in Wickham Market, Darsham, Leiston, along the A12 and B1122 and on the surrounding road network where used. If not, why not?

"…use of rail to deliver freight …" KcCPC support a rail initiative, but believes a more ambitious programme would not only make further significant reductions in HGV traffic, but also give Coastal Suffolk a legacy with the potential for generating further economic and tourism benefits (i.e. working in partnership with The Longshop).

"…the beach landing facility (BLF) for Abnormal Indivisible Loads …" KcCPC recognise a BLF may be necessary, but are hopeful that 'low impact' design and technology will minimise and mitigate any lasting ecological impacts.

"…of a two village bypass on the A12 to remove through-traffic from the villages of Farnham and Stratford St Andrew…" KcCPC recognise a pressing need to improve the A12 along much of its length.

In that connection, KcCPC is concerned that the proposal being brought forward at Stage 3 is not a material improvement in the A12, save for a significant uplift in the quality of life of residents adjacent to, or close by the road in Farnham and Stratford St Andrew.

It remains single carriageway and as a result of this proposal, two more roundabouts are being introduced into the A12, with the potential to decelerate/accelerate traffic flow into and out of the roundabout – a particular concern with high HGV content flows.

"…the provision of a Sizewell link road (road-led strategy) or Theberton bypass (rail-led strategy) to reduce the amount of traffic on much of the B1122…" KcCPC recognise a pressing need to improve the A12 along much of its length as well as access to and from; the Sizewell sites (A, B & C) and other associated 'energy' projects.

In that connection, KcCPC is concerned that the proposal being brought forward at Stage 3 is not a material improvement for B1122 communities, nor does it address the underpinning issue of an unnecessarily long northward journey up the A12 for construction traffic and subsequent to completion, 'outage', maintenance and decommissioning activities (Sizewell A, B & C).

The A12 remains single carriageway, as do the proposed roads and as a result of this proposal, another roundabout is introduced into the A12, with the potential to decelerate/accelerate traffic flow into and out of the roundabout – a particular concern with high HGV content flows.

Moreover; a valuable tract of valuable arable farming land is lost, B1122 communities become 'ringed' by roads, as yet unquantified ecological impacts will occur and a heavy flow of predominantly diesel powered traffic will reduce air quality significantly.

6.4.41 KcCPC note the content of the paragraph and Tables 6.2 to 6.5

KcCPC note that EDF Energy acknowledge residual traffic impacts "…represent, in many cases, significant increases in traffic flows over conditions that would be experienced in 2027 if Sizewell C were not under construction."
However, KcCPC cannot agree with the EDF Energy assertion that "…they are unlikely to cause additional congestion or delays…".

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the Road-led option, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 32 seconds, with a corresponding southbound movement every minute.

Even under the Rail-led proposal, at peak working, this seemingly simple task would remain daunting with the traffic flows broadening to one HGV every 54 seconds and 1 minute 26 seconds respectively.

It must be noted that, after a short distance of dual carriageway following the proposed two village bypass, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.

Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

6.4.42 KcCPC note the content of the paragraph

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

6.4.43 KcCPC note the content of the paragraph

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

6.4.44 KcCPC note the content of the paragraph

6.5 Traffic modelling of the Sizewell C early years construction phase

6.5.1 KcCPC note the content of the paragraph

KcCPC note the complexity of modelling concurrent, multi-variable, geographically dispersed impacts and wonder what assumed and tested degree of confidence has been achieved.

6.5.2 KcCPC note the content of the paragraph

6.5.3 KcCPC note the content of the paragraph and Table 6.12

KcCPC note nearly 45% of the 'associated development' workforce is attributable to the proposed 'Sizewell Link' road, whilst the 'Two Village bypass' accounts for less than 15%. (17% and 5.6% of the total 'Early years' workforce respectively).

KcCPC consider this disproportionate for a Sizewell Link proposal that has little, if any public support. KcCPC therefore can only consider it indicative of desire by EDF Energy, to force a Link Road as an expedient measure, rather than a responsible response to the concerns of communities on the B1122.

KcCPC again note the reluctance of EDF Energy to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements.

KcCPC is alarmed at the number of HGV movements (per day) being forecast without any of the mitigations being in place (split 85% from South, 15% from North):

Main site -	300 deliveries	600 movements
Darsham P&R -	21	42
Wickham Market P&R -	21	42
A12 Yoxford -	10	20
Two Villages Bypass -	60	120
Sizewell Link -	175	350
FMF -	30	60
Total	**617**	**1,234**

This represents an HGV load on local infrastructure (without any mitigation) of:

82.26% of the forecast for a Road-led option (Busiest Day)

and

137.1% of the forecast for a Rail-led option (Busiest Day)

Note: uses figures from the input parameters (Table 6.1 on Page 116)

a) HGV delivery profile

6.5.4 KcCPC note the content of the paragraph and Figure 6.5

KcCPC note that the profile of deliveries is assumed to operate as at peak construction described at Figure 6.5 (and in the absence specific volumes/percentages) assumed to be:

	Deliveries	#	Departures	#
07:00-08:00	17.5%	108	2.25%	14
08:00-09:00	17.5%	108	6.25%	38
09:00-10:00	17.5%	108	11.00%	68
10:00-11:00	11.5%	70	14.50%	89
11:00-12:00	7.5%	46	14.75%	91
12:00-13:00	7.5%	46	12.25%	75
13:00-14:00	3.0%	19	9.00%	55
14:00-15:00	3.0%	19	6.00%	37
15:00-16:00	4.0%	25	5.00%	31
16:00-17:00	4.0%	25	4.00%	25
17:00-18:00	4.0%	25	3.75%	23
18:00-19:00	2.0%	12	3.75%	23
19:00-20:00	1.0%	7	3.50%	21
20:00-21:00			2.00%	12
21:00-22:00			1.50%	10
22:00-23:00			0.50%	3

b) Car sharing

6.5.5 KcCPC note the content of the paragraph

KcCPC again note the reluctance to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements

c) Non-work related travel by NHB worker

6.5.6 KcCPC note the content of the paragraph

d) Weekend travel by NHB workers

6.5.7 KcCPC note the content of the paragraph

6.5.8 KcCPC note the content of the paragraph

6.5.9 KcCPC note the content of the paragraph

e) Visitors

6.5.10 KcCPC note the content of the paragraph and Table 6.12

6.5.11 KcCPC note the content of the paragraph

f) Assessment basis

6.5.12 KcCPC note the content of the paragraph and Table 6.12

6.5.13 KcCPC note the content of the paragraph

6.6 Early years construction traffic effects across the modelled area

6.6.1 KcCPC note the content of the paragraph

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the 'Early Years' model, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 33 seconds, with a corresponding southbound movement every 53 seconds (9:00 – 10:00).

It must be noted that, after a short distance of dual carriageway up to Saxmundham, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.

Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

6.6.2 KcCPC note the content of the paragraph

Once again KcCPC is forced to point out that if "In practice, only part of the traffic might re-route, or none at all.", then EDF Energy should not rely on, or imply that re-routing will ameliorate traffic conditions at any point along a route, unless there is substantial evidence that corroborate the assertion, on a like-for-like basis. KcCPC do not believes any such evidence has been available in the EDF Energy Stage 3 consultation.

Moreover, KcCPC do not believes that any Hinkley Point C experience provides a valid insight into the vastly different road environment along the A14, A12, B1122 route and the surrounding road networks.

Consequently, it remains for EDF Energy to evidentially prove any Hinkley Point C comparator, which KcCPC do not believes has been done at Stage 3, or in the previous consultations.

6.6.3 KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

6.6.4 KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

6.6.5 KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

KcCPC is also concerned that a significant portion of Tunstall lies within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (the boundary of which is defined by the B1069 road as it cuts diagonally across the Parish) and that unfettered re-routing to avoid congestion arising from EDF Energy impacts on the A12 in unconscionable.

KcCPC look forward to reviewing mitigations EDF Energy will bring forward to avoid the impacts their A12 traffic load will visit on the Tunstall area.

6.6.6 KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment.

6.6.7 KcCPC note the content of the paragraph and Table 6.14

KcCPC note as pointed out by EDF Energy themselves, the use of percentage increases alone does nothing to demonstrate the absolute impact. (i.e. 100% increase on a base of 2 is +2, while a 1% increase on 1,000 is +10).

Consequently, KcCPC find the figures at Table 14 completely meaningless, like many of the tables furnished elsewhere in the Stage 3 consultation.

See notes and illustrative example at **6.4.19** that demonstrates how a consulter can show that it really does want engagement with consultees, rather than just 'going through the motions'.

6.6.8 KcCPC note the content of the paragraph and Tables 6.13 and 6.14

KcCPC note an observation that is a function of mathematical certainty. That is to say if the term 'Peak Hours' is truly the peak hours of a day, then almost invariably they will be higher than the daily average!

6.6.9 KcCPC note the content of the paragraph and Tables 6.15

KcCPC note the unnecessary complication of Table 6.15, as it had already noted on Table 6.12 that Bus movements were nil for; Park & Ride, Ipswich & Lowestoft direct and that apart from LEEIE to main site, other movements were minimal.

Quite why this was deemed necessary is hard to imagine, other than to confound the reader?

6.6.10 KcCPC note the content of the paragraph

6.6.11 KcCPC note the content of the paragraph

KcCPC note that the B1122 could be subject to up to 600 HGV movements per day, it also notes that this corresponds to the 300 Main Site deliveries referred to previously at Table 6.12.

KcCPC also note that this daily pattern could continue for up to a year.

6.6.12 KcCPC note the content of the paragraph

KcCPC note that Farnham and Marlesford (and presumably all points south on the A12 to Woodbridge) could be subject to up to 970 HGV movements per day prior to completion of the two-village bypass.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment. KcCPC is particularly concerned for the communities on or adjacent to the A12 (i.e. Little Glemham and Marlesford)

6.6.13 KcCPC note the content of the paragraph

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

6.6.14 KcCPC note the content of the paragraph and Tables 6.16 & 6.18

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

a) Traffic increases on the B1122

6.6.15 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy to use the B1122 to provide access to the main development site for "…all Sizewell C-related traffic…" until completion of the Theberton bypass and/or a Sizewell Link road (if found to be appropriate). KcCPC also note the previously stated intention of EDF Energy to utilise the B1122 as an alternative route in the event of a closure effecting the Theberton bypass and/or a Sizewell Link road (if found to be appropriate).

6.6.16 KcCPC note the content of the paragraph and Table 6.16

6.6.17 KcCPC note the content of the paragraph

KcCPC note "all-vehicle daily traffic flows on the section of the B1122 between the junction with the A12 east of Yoxford and the Sizewell C construction site are **estimated** to range between around 3,450 and 5,150 vehicle movements per day." and are surprised that EDF Energy have not taken steps to fully understand the traffic flows, given the B1122 is in reality, the only existing access to the development site for all vehicle types.

KcCPC is concerned that "…forecasts…" are seemingly being based on "…estimated…" figures with a broad range (3,450 to 5,150) and are concerned whether this represents a robust mechanism going forward?

6.6.18 KcCPC note the content of the paragraph

KcCPC note "The B1122/Mill Street improvement would be in place by the very early stages of construction." and are interested as to why EDF Energy do not parameterise what the term "…very early stages…" really means? KcCPC assume that EDF Energy do have a current Project Plan, so presumably this would not be difficult?

6.6.19 KcCPC note the content of the paragraph

b) Traffic increases on the A12

6.6.20 KcCPC note the content of the paragraph and Table 6.17

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the 'Early Years' model, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 33 seconds, with a corresponding southbound movement every 53 seconds (9:00 – 10:00).

It must be noted that, after a short distance of dual carriageway up to Saxmundham, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.

Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

6.6.21 KcCPC note the content of the paragraph and Table 6.17

KcCPC understand the EDF Energy find it necessary to restate their case in relation to existing road capacity issues, their view that Sizewell C Construction traffic will not materially exacerbate congestion on the A12, and where it does it is better than or equivalent to non-Sizewell C connected traffic.

It also is not surprised (as EDF Energy seemingly are) that northern A12 traffic flows are lower than those on the southern portion.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment. KcCPC is particularly concerned for the communities on or adjacent to the A12 (i.e. Little Glemham and Marlesford) along its length.

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

6.6.22 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "…continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "…South of Yoxford…" by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

c) Traffic increases elsewhere

6.6.23 KcCPC note the content of the paragraph

6.6.24 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "…the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

6.6.25 KcCPC note the content of the paragraph

KcCPC is also concerned that a significant portion of Tunstall lies within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (the boundary of which is defined by the B1069 road as it cuts diagonally across the Parish) and that unfettered re-routing to avoid congestion arising from EDF Energy impacts on the A12 in unconscionable.

KcCPC look forward to reviewing mitigations EDF Energy will bring forward to avoid the impacts their A12 traffic load will visit on the Tunstall area.

6.6.26 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "…South of Yoxford…" by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

6.6.27 KcCPC note the content of the paragraph

KcCPC note that "On the A14, west of the Seven Hills roundabout (location S), a large volume of Sizewell C-related trips is expected including a significant proportion of HGVs delivering to the main development site as well as the associated development construction sites. However, the Sizewell C traffic is a very small percentage of the existing traffic levels and is not expected to exceed the capacity of the junction. EDF Energy will discuss the investigation of effects on the A12/A14 junctions 55 and 58 with Highways England, prior to the application for development consent." and anticipate any application for development consent going forward with an agreed position on A14 J58 between EDF Energy, Highways England and SCC.

6.6.28 KcCPC note the content of the paragraph

KcCPC note that EDF Energy do not provide any quantification in support of the assertion that "the traffic flows are higher than those reported at Stage 2 for peak construction. The main reason for this is the inclusion of Sizewell B outage trips in all future year scenarios." and is very disappointed that this appears to be a feature of the Stage 3 consultation.

d) Summary

6.6.29 KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes "The mitigation proposals set out in Volume 2 would significantly reduce the effects of construction of Sizewell C on the surrounding highway network." With regret, KcCPC also notes that "…many of these measures would not be in place during the early years of the construction phase, currently taken to be 2022, which means that although the construction workforce would be much smaller than at peak construction, the effects could be greater in particular locations…." a sadly unnecessary situation driven principally by haste, rather than efficacy.

6.6.30 KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes "There are significant increases in HGV volumes on the A12 and B1122… before the proposed bypasses that would remove these trips from Theberton, Farnham and Stratford St Andrew" and whilst KcCPC cannot dispute the assertion, it must point out that the proposals do just move the issue (to green fields!) and do nothing to reduce the overarching impacts on the Suffolk Coastal area as a whole.

6.6.31 KcCPC note the content of the paragraph

KcCPC note the overly complex structure of the paragraph, presumably intended to convince the reader that the modelling assumptions are 'worst case'?

However, the proposal that "…from this Stage 3 consultation, detailed consideration will be given to the programme of mitigation implementation which will be optimised to minimise the effects on the highway network…" does little to reassure this particular reader!

6.6.32 KcCPC note the content of the paragraph and Table 6.15

KcCPC note the EDF Energy assertion that the farther away from the construction site, the less impactful the traffic flow increases emanating on and around the A12!

EDF Energy also observe that apart from the A14, A12 and the B1122, the only other roads to suffer undue increases in traffic are Lovers Lane and the A145 at Beccles!

KcCPC note EDF Energy's assertion that "The increase on the A14 at Ipswich is small when compared to the existing traffic flows." but regard the potential impact as more significant, referring to the work of WSP in August 2018, prepared for SCDC as part of their Draft Local Plan.

7. Main Development Site (Volume 1, Pages 158 to 239)

7.1 Introduction

KcCPC is aware that qualified public interest groups, along with the Parish Councils adjacent and adjoining the town of Leiston are preparing their own responses to the Sizewell C development (Main Site). As consequence, KcCPC will be limiting their comments in regard to the Main Development Sites, where either qualification and/or proximity are not key requirements.

KcCPC reserve the right to make comment, qualified as "subject to KcCPC's view being agreed by those qualified and/or directly impacted".

KcCPC remaining silent on a point should not be construed as being either supportive or otherwise.

7.1.1 KcCPC note the content of the paragraph and Figure 7.1

7.1.2 KcCPC note the content of the paragraph

7.1.3 KcCPC note the content of the paragraph

7.1.4 KcCPC note the content of the paragraph

7.1.5 KcCPC note the content of the paragraph, Figure 7.2 and Table 7.1

7.1.6 KcCPC note the content of the paragraph

7.2 Nuclear operation

7.2.1 KcCPC note the content of the paragraph and Figure 7.3

7.2.2 KcCPC note the content of the paragraph

7.2.3 KcCPC note the content of the paragraph

7.2.4 KcCPC note the content of the paragraph

7.2.5 KcCPC note the content of the paragraph

7.2.6 KcCPC note the content of the paragraph

7.2.7 KcCPC note the content of the paragraph

7.2.8 KcCPC note the content of the paragraph and Figure 7.4

7.2.9 KcCPC note the content of the paragraph

7.2.10 KcCPC note the content of the paragraph

7.2.11 KcCPC note the content of the paragraph

a) Nuclear safety and design

7.2.12 KcCPC note the content of the paragraph

Generic Design Assessment

7.2.13 KcCPC note the content of the paragraph

7.2.14 KcCPC note the content of the paragraph

7.2.15 KcCPC note the content of the paragraph

7.2.16 KcCPC note the content of the paragraph

Nuclear site licence

7.2.17 KcCPC note the content of the paragraph

7.2.18 KcCPC note the content of the paragraph

Fukushima

7.2.19 KcCPC note the content of the paragraph

Spent fuel and radioactive waste management

7.2.20 KcCPC note the content of the paragraph

7.2.21 KcCPC note the content of the paragraph

7.2.22 KcCPC note the content of the paragraph

7.2.23 KcCPC note the content of the paragraph

7.2.24 KcCPC note the content of the paragraph

b) Decommissioning

7.2.25 KcCPC note the content of the paragraph

7.2.26 KcCPC note the content of the paragraph

7.3 Design principles

7.3.1 KcCPC note the content of the paragraph

KcCPC specifically note that:

"Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."

7.3.2 KcCPC note the content of the paragraph and Table 7.2

KcCPC specifically note:

5a. "Avoid redesign activity with the potential to cause programme delays either during pre-construction…"

6. Cost "To ensure commercial viability the Sizewell C Project needs to achieve real cost savings…"

6a. "…to avoid redesign costs, maximise the efficiency of construction…"

6b. "Monitor the cumulative cost impact of design changes."

7b. "Maintain viability by balancing high quality design within the required programme and budget."

8a. "Best environmental practice…taken into account…ensure high standards of environmental protection."

9g. "Minimise, where reasonably practicable, visual effects at night from lighting and light spill…"

10c. "Design the development, including lighting, access and fencing, to minimise disturbance to protected species, including at night…"

11a. "avoid or minimise likely significant impacts on other non-designated heritage assets including buried archaeology"

14. Access "Permanent access to and within the site must meet all operational requirements."

14a. "Provide a new access road from the north-west as the main operational access to Sizewell C, taking into account the surrounding environment."

Regrettably, KcCPC also note the absence of a focus within the "Design principles and brief" to construction being "efficient in the use of natural resources and energy" (see 7.3.1 above), particularly with regard to the delivery of materials into site.

7.3.3 KcCPC note the content of the paragraph and Table 7.2

7.4 Permanent development

a) Introduction

7.4.1 KcCPC note the content of the paragraph

7.4.2 KcCPC note the content of the paragraph

7.4.3 KcCPC note the content of the paragraph, Figure 7.5 and Table 7.3

b) Sizewell C power station during the operational phase

7.4.4 KcCPC note the content of the paragraph and Figure 7.6

KcCPC note with concern the intended incursion of the Sizewell C development into the SSSI

Nuclear safety buildings, including reactor buildings

7.4.5 KcCPC note the content of the paragraph

7.4.6 KcCPC note the content of the paragraph

7.4.7 KcCPC note the content of the paragraph

7.4.8 KcCPC note the content of the paragraph

7.4.9 KcCPC note the content of the paragraph

Turbine halls

7.4.10 KcCPC note the content of the paragraph

7.4.11 KcCPC note the content of the paragraph

7.4.12 KcCPC note the content of the paragraph

7.4.13 KcCPC note the content of the paragraph

7.4.14 KcCPC note the content of the paragraph

7.4.15 KcCPC note the content of the paragraph

7.4.16 KcCPC note the content of the paragraph, Figure 7.7 and Figure 7.8

Operational Service Centre

7.4.17 KcCPC note the content of the paragraph

7.4.18 KcCPC note the content of the paragraph

7.4.19 KcCPC note the content of the paragraph

7.4.20 KcCPC note the content of the paragraph and Figure 7.9

Interim spent fuel store

7.4.21 KcCPC note the content of the paragraph

7.4.22 KcCPC note the content of the paragraph

Forebays

7.4.23 KcCPC note the content of the paragraph

Changes to the electrical connection to National Grid substation

7.4.24 KcCPC note the content of the paragraph

7.4.25 KcCPC note the content of the paragraph

7.4.26 KcCPC note the content of the paragraph

KCPC note a series of justifying paragraphs under 7.4.26. In general, they allude to detrimental impacts on the programme (presumably contrary to 5a in 7.3.2 above) and latterly the cost benefit of adopting "…overhead connection…".

KcCPC is not qualified to make comment on the assertions made, but do note that EDF Energy fail to provide any quantifiable evidence in support of their revised position.

7.4.27 KcCPC note the content of the paragraph, and Figures 7.10 to 7.13

7.4.28 KcCPC note the content of the paragraph

KcCPC note that as yet neither EDF Energy or National Grid are able to confirm how many existing pylons may need to be relocated to allow connection to a new substation. KcCPC note that the outcome of further National Grid consideration of the issue may have significant impacts on the visual amenity.

7.4.29 KcCPC note the content of the paragraph

KcCPC note that EDF Energy have "…included additional land within the SSSI…" to accommodate not just the installation of overhead lines, but their over-running of the SSSI on a permanent basis. EDF Energy contend "…there are unlikely to be any long-term impacts at ground level and no additional pylons would be required within the SSSI." KcCPC wonder whether there are existing sites where this assertion has been either confirmed or shown to be incorrect?
KcCPC also note that EDF Energy intend to include details "from National Grid on their approach to construction will be reflected in our application for development consent." and wonder whether this is for the

purpose of obtaining any required consents, rather than National Grid making separate application – it is currently unclear as written.

c) Sizewell B Relocated Facilities

7.4.30 KcCPC note the content of the paragraph

7.4.31 KcCPC note the content of the paragraph and Figure 7.14

7.4.32 KcCPC note the content of the paragraph

7.4.33 KcCPC note the content of the paragraph

7.4.34 KcCPC note the content of the paragraph, Figure 7.15 and Figure 7.16

7.4.35 KcCPC note the content of the paragraph

KcCPC note with interest the statement (in a Stage 3 consultation in respect to Sizewell C) by EDF Energy that, EDF Energy Nuclear Generation Ltd (NGL) "…intend to apply for these proposed works through a Town and Country Planning Act 1990 (TCPA) planning application to Suffolk Coastal District Council (SCDC). A scoping opinion was provided by SCDC in 2016 and pre-application engagement with SCDC and other key stakeholders will continue until determination of the planning application."

7.4.36 KcCPC note the content of the paragraph

KcCPC note with interest, the statements of EDF Energy (in a Stage 3 of a consultation in respect to Sizewell C) that "In applying for these proposed works through a planning application to SCDC, the Sizewell B Relocated Facilities Project would facilitate the Government's policy objective of more rapid development of new nuclear power, by ensuring earlier delivery of Sizewell C than if the relocation proposals were included as part of the application for development consent for the Sizewell C Project." and that "There is precedence for bringing forward early and/or preparatory works associated with Nationally Significant Infrastructure Projects (NSIP) under the TCPA, ahead of the grant of a Development Consent Order (DCO). This includes the site preparation works associated with the construction of two new nuclear reactors at Hinkley Point C, which were secured by a full planning permission (Local Planning Authority reference: 3/32/10/037) granted by West Somerset Council."

7.4.37 KcCPC note the content of the paragraph

KcCPC note "…it is important for EDF Energy to be sure that these works will be consented and undertaken. Therefore, the proposals for Relocated Facilities will be included within our application for development consent for the project."

7.4.38 KcCPC note the content of the paragraph

KcCPC note with interest, the statements of EDF Energy (in a Stage 3 of a consultation in respect to Sizewell C) that "The planning application to SCDC will be a mixture of detailed and outline proposals. A more detailed description of the proposed Relocated Facilities, including their design and proposed use…".

7.4.39 KcCPC note the content of the paragraph

KcCPC is surprised, considering the EDF Energy (Sizewell C project) inputs to Paragraphs 7.4.35 to 7.4.38 (above) that "**outage car park** – this is proposed to be located outside the Sizewell B station site security perimeter, at the northern end of Pillbox Field…The car park would be used during Sizewell B outages only…" KcCPC would have thought that in light of **items 6 and 7b at 7.3.2** (above) this potential 'cost saving' would have been realised (a 580 space car park, at what cost?)! Afterall, as is pointed out elsewhere in the Stage 3 consultation, 'outages' are only anticipated every eighteen months for approximately 6 weeks.

KcCPC is sure that other potential 'cost savings' could be realised from the list of Sizewell B facilities portrayed in 7.4.39, but despite the temptation, it is not minded to do the work for EDF Energy, although it hopes EDF Energy will look closely at the opportunities afforded by this paragraph!

KcCPC note that the descriptions in 7.4.39 are described as "Facilities to be applied for in detail". KcCPC does not regard the brief descriptions as, 'detailed' and hopes that SCDC and the Planning Inspectorate seek a significantly improved threshold when applications are formally made.

7.4.40 KcCPC note the content of the paragraph

KcCPC would have thought that in light of **items 6 and 7b at 7.3.2** (above) more potential 'cost savings' could have been realised from items in 7.4.39 and 7.4.40, but do recognise that EDF Energy may not wish to see savings realised from shared facilities irrespective of the cost and duplication within the EDF Energy Estate, where space is understood and portrayed as being at a premium?

d) Remainder of the EDF Energy estate during the operational phase

North of the power station at Goose Hill

7.4.41 KcCPC note the content of the paragraph and Figure 7.27

7.4.42 KcCPC note the content of the paragraph

KcCPC note the cynical comment that "A permanent two-lane access road continues to be proposed, with a segregated route for cyclists and pedestrians. The road width would be reduced following construction and designed to establish a corridor similar in character to a country road…" and compares this treatment with that being proposed for EDF's Sizewell Link road that destroys the 'real countryside' and damages country roads and lanes within a large radius!

This double standard, lays waste any remaining thoughts that EDF Energy's development at Sizewell C is, anything other than a: minimised cost, commercially expedient attempt to wring as much out of a beneficial strike price as possible, in order to tempt investors into an increasingly unpopular proposition.

7.4.43 KcCPC note the content of the paragraph and figure 7.17

KcCPC note that "The car park would be designed to accommodate around 1,335 spaces divided between permanent parking spaces for day-to-day operation (approximately 735) and spaces required during outage periods when the training facilities would be in use (approximately 600). and refer to comments at 7.4.39 above.

Seemingly, the drive to "**6. Cost** To ensure commercial viability the Sizewell C Project needs to achieve real cost savings associated with being the 'next of a kind', avoiding significant redesign without compromising overall design quality." does not extend to cars and the over provision of car parking.

7.4.44 KcCPC note the content of the paragraph

Training building

7.4.45 KcCPC note the content of the paragraph

7.4.46 KcCPC note the content of the paragraph

7.4.47 KcCPC note the content of the paragraph

7.4.48 KcCPC note the content of the paragraph

7.4.49 KcCPC note the content of the paragraph

7.4.50 KcCPC note the content of the paragraph

KcCPC note EDF Energy "have explored the possibility of sharing a training building with Sizewell B power station…However, the two power stations operate using different technologies and there is therefore minimal overlap in terms of common training facilities.", but would have thought the simple architectural challenge of a double wing facility with a common services central core not beyond most undergraduate architectural students.

7.4.51 KcCPC note the content of the paragraph

KcCPC note "a much larger training centre, leaving insufficient space for the laydown area. The training centre also needs to be next to the Sizewell C outage car park, as it is used for site inductions during outages." and think that perhaps a shared 'laydown area' and 'outage car park' would be the answer.

Perhaps EDF Energy should approach a few of the leading Schools of Architecture, as they often look for real commercial need when setting student assignments?

7.4.52 KcCPC note the content of the paragraph

See comments at 7.4.50 and 7.4.51 above.

KcCPC now understand that; as well as car parking spaces being exempt from potential 'cost saving measures', Training Centres are also seemingly exempt from rigorous review when seeking cost reductions.

SSSI Crossing

7.4.53 KcCPC note the content of the paragraph

7.4.54 KcCPC note the content of the paragraph

7.4.55 KcCPC note the content of the paragraph

7.4.56 KcCPC note the content of the paragraph and Table 7.4

7.4.57 KcCPC note the content of the paragraph

7.4.58 KcCPC note the content of the paragraph

7.4.59 KcCPC note the content of the paragraph and Figure 7.19

SSSI land and associated habitat

7.4.60 KcCPC note the content of the paragraph

7.4.61 KcCPC note the content of the paragraph

7.4.62 KcCPC note the content of the paragraph

7.4.63 KcCPC note the content of the paragraph

7.4.64 KcCPC note the content of the paragraph

7.4.65 KcCPC note the content of the paragraph

Movement of wildlife along the corridor

7.4.66 KcCPC note the content of the paragraph

Flood-risk

7.4.67 KcCPC note the content of the paragraph

7.4.68 KcCPC note the content of the paragraph

East of the power station along the coast

Northern mound

7.4.69 KcCPC note the content of the paragraph

7.4.70 KcCPC note the content of the paragraph

7.4.71 KcCPC note the content of the paragraph

KcCPC note that "We currently consider it unlikely that it will be strong enough and we will confirm this through ground testing prior to the submission of the application for development consent."

7.4.72 KcCPC note the content of the paragraph

7.4.73 KcCPC note the content of the paragraph

7.4.74 KcCPC note the content of the paragraph

7.4.75 KcCPC note the content of the paragraph

7.4.76 KcCPC note the content of the paragraph

7.4.77 KcCPC note the content of the paragraph

Sea defence

7.4.78 KcCPC note the content of the paragraph

7.4.79 KcCPC note the content of the paragraph

7.4.80 KcCPC note the content of the paragraph and Figures 7.21 and 7.22

7.4.81 KcCPC note the content of the paragraph

7.4.82 KcCPC note the content of the paragraph and Figure 7.23

7.4.83 KcCPC note the content of the paragraph

7.4.84 KcCPC note the content of the paragraph

West of the power station towards Abbey Road (B1122)

Emergency equipment store at Upper Abbey Farm

7.4.85 KcCPC note the content of the paragraph

7.4.86 KcCPC note the content of the paragraph

7.4.87 KcCPC note the content of the paragraph and Figure 7.24

Backup generator at Upper Abbey Farm

7.4.88 KcCPC note the content of the paragraph

7.4.89 KcCPC note the content of the paragraph

7.4.90 KcCPC note the content of the paragraph

7.4.91 KcCPC note the content of the paragraph

7.4.92 KcCPC note the content of the paragraph

7.4.93 KcCPC note the content of the paragraph

KcCPC note the intention to "retain the CHP plant and put it to continued use during the operational phase of the power station as a backup generator." and wonder whether opportunities have been explored to exploit the capacity of the CHP plant for social benefit in the Leiston area, whilst simultaneously retaining it in a permanent state of readiness as a backup generator?

7.4.94 KcCPC note the content of the paragraph

7.4.95 KcCPC note the content of the paragraph

Electrical substation south of Upper Abbey Farm

7.4.96 KcCPC note the content of the paragraph

7.4.97 KcCPC note the content of the paragraph

7.4.98 KcCPC note the content of the paragraph

7.4.99 KcCPC note the content of the paragraph and Figure 7.26

North of Sizewell Gap and south of Sandy Lane

Helipad

7.4.100 KcCPC note the content of the paragraph

KcCPC note a reference to Figure 7.26, but understand this figure to be the substation at Upper Abbey Farm not a Helipad at Sizewell Gap

Permanent masterplan

7.4.101 KcCPC note the content of the paragraph

KcCPC note "The permanent proposals for the wider EDF Energy estate beyond those elements described above have not substantially altered from Stage 2, with a strategy for establishing extensive lowland heathland and new and enhanced woodland cover." and anticipate this continuing through any subsequent application.

7.4.102 KcCPC note the content of the paragraph

7.4.103 KcCPC note the content of the paragraph

7.4.104 KcCPC note the content of the paragraph

Masterplan overview

7.4.105 KcCPC note the content of the paragraph

7.4.106 KcCPC note the content of the paragraph

Landscape strategy

7.4.107 KcCPC note the content of the paragraph

7.4.108 KcCPC note the content of the paragraph

e) Parameters for the permanent development

7.4.109 KcCPC note the content of the paragraph

KcCPC note with a degree of scepticism that "Sizewell C is a large and complex scheme that must conform to strict safety and regulatory requirements, which can change with best practice over time. Therefore, as we have learned at Hinkley Point C, designs that are at an advanced stage will still necessarily continue to evolve after the Government grants any development consent for the project." and once again are disturbed that EDF Energy have not brought forward any evidence from their 'Hinkley Point C' experience to demonstrate the issues leading it to have "designs that are at an advanced stage will still necessarily continue to evolve after the Government grants any development consent for the project."

7.4.110 KcCPC note the content of the paragraph

KcCPC note that EDF Energy intend "Applying for flexibility within parameters (known as the Rochdale Envelope) …" and contend that without experiential evidence having been presented, this is potentially just another tactic to avoid scrutiny, rather than a pragmatic 'ask' borne on the basis of substantial and current evidence.

7.4.111 KcCPC note the content of the paragraph

See comments at 7.4.110 above

f) Impact on Sizewell Marshes SSSI

7.4.112 KcCPC note the content of the paragraph

KcCPC that the potential loss of 6.06ha of the SSSI (at Stage 2) has not been reduced by EDF Energy, yet simultaneously car park spaces abound, Training Centres grow and the thought of shared facilities (i.e. lay down, outage parking, etc.) seem unconscionable.

KcCPC perceive this as just another double standard, laying waste to any remaining thoughts that EDF Energy's development at Sizewell C is, anything other than a: minimised cost, commercially expedient attempt to wring as much out of a beneficial strike price as possible, in order to tempt investors into an increasingly unpopular proposition.

As commented by one Kelsale cum Carlton resident when referring to land in the Suffolk Coastal area, "They don't make it anymore"!

7.4.113 KcCPC note the content of the paragraph

Whilst KcCPC note the creation of habitats at Aldhurst Farm, it would remind EDF Energy that the first priority of a socially responsible development is 'avoidance', the second priority is 'mitigation' and only then should the issue of compensatory action be concerned.

KcCPC consider EDF Energy opining "Habitats within this area include wet woodland, reed beds, ditches and fen meadow. To provide compensation for this loss EDF Energy has developed a habitat creation scheme at Aldhurst Farm, which is upstream and contiguous with the Sizewell Marshes SSSI." as a very thin veil of convenience covering an abrogation of EDF Energy's environmental responsibilities when seeking a development order for Sizewell C.

7.4.114 KcCPC note the content of the paragraph

7.5 Construction phase

a) Introduction

7.5.1 KcCPC note the content of the paragraph

7.5.2 KcCPC note the content of the paragraph and Figure 7.30

b) Construction masterplan

7.5.3 KcCPC note the content of the paragraph

KcCPC note the requirement for "careful planning"

KcCPC is concerned that with the close proximity of so many ecological assets to the main development site, extra care is taken with the movement, fuelling and storing of machinery and special equipment.

KcCPC assume that all the workforce will be notified of their obligations in respect to the handling of machinery, fuels and other substances with the potential for endangering the environment in the Suffolk Coastal area?

KcCPC assume that that EDF have conducted a full risk and mitigation analysis and that as a consequence bunded storage and re-fuelling areas will be established appropriately, management of fuels (and other volatile liquids) will be stored and handled in accordance with the requisite provisions and that management oversight will be present at all transfer points.

Moreover, KcCPC assume that suitable equipped and trained environmental protection teams will be permanently stationed to take all necessary actions to minimise environmental impacts in the event of seepage, spillage and any other unmanaged release of fuels and other volatile liquids.

KcCPC believes that such important considerations should be integral to any application for a development order, and thereby subject to scrutiny and public inspection, as an integral part of any development order consideration.

7.5.4 KcCPC note the content of the paragraph

KcCPC note the regard EDF Energy have for:

- Locating construction activity liable to cause disturbance away from where people live
- Minimise land take from the Sizewell Marshes SSSI
- Avoiding the sensitive landscapes in the AONB
- Avoiding non-essential use of the foreshore
- Limiting disturbance to deciduous woodland, hedgerows and tree belts
- Minimising multiple movements of people, material, etc.
- Limiting disturbance to habitats (retain and new)
- Considering disturbance to European designated assets
- Maintaining access (i.e. recreation and amenity)
- The settings of key heritage assets

7.5.5 KcCPC note the content of the paragraph and Figures 7.31 and 7.32

c) Construction phasing

7.5.6 KcCPC note the content of the paragraph and Figure 7.33

7.5.7 KcCPC note the content of the paragraph

Phase 1 – Site establishment and preparation for earthworks

7.5.8 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.9 KcCPC note the content of the paragraph

7.5.10 KcCPC note the content of the paragraph

7.5.11 KcCPC note the content of the paragraph

7.5.12 KcCPC note the content of the paragraph

Phase 2 – main site earthworks and completion of temporary infrastructure

7.5.13 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.14 KcCPC note the content of the paragraph

7.5.15 KcCPC note the content of the paragraph

7.5.16 KcCPC note the content of the paragraph

7.5.17 KcCPC note the content of the paragraph

7.5.18 KcCPC note the content of the paragraph

7.5.19 KcCPC note the content of the paragraph

Phase 3 – Main civils

7.5.20 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.21 KcCPC note the content of the paragraph

Phase 4 – Mechanical and electrical installation

7.5.22 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use from Day 1 to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.23 KcCPC note the content of the paragraph

Phase 5 – commissioning and land restoration

7.5.24 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use from Day 1 to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.25 KcCPC note the content of the paragraph

7.5.26 KcCPC note the content of the paragraph

d) Power station platform (main platform)

7.5.27 KcCPC note the content of the paragraph

7.5.28 KcCPC note the content of the paragraph

KcCPC note with regret that to establish the boundary of the main platform EDF Energy propose to:

- divert the Sizewell Drain within the Sizewell Marshes SSSI
- install a barrier between the retained SSSI area and the site, likely constructed of steel sheet piling
- undertake ground treatment and land raising within those areas removed from the SSSI

KcCPC is disappointed that such radical measures are necessary

7.5.29 KcCPC note the content of the paragraph

7.5.30 KcCPC note the content of the paragraph

KcCPC note that "…completion of the cut-off wall, the contained area would be dewatered…" and note that the method of dewatering is not identified. Is this because of the method being used and the potential threat to any residual wildlife?

7.5.31 KcCPC note the content of the paragraph

SSSI crossing during construction

7.5.32 KcCPC note the content of the paragraph and Figure 7.39

7.5.33 KcCPC note the content of the paragraph

7.5.34 KcCPC note the content of the paragraph

Construction programme

7.5.35 KcCPC note the content of the paragraph

KcCPC note that "…timing of the construction of the SSSI crossing to connect the main platform with the temporary construction area is crucial to the overall construction programme and therefore early delivery is a high priority for the project.", and "…Commencing the main earthworks in the first available summer is very important…", as a consequence it is concerned to ensure that independent verification of the diligence exercised during this delicate phase is ensured. Consequently, KcCPC seek clarity on the steps being taken by EDF Energy to mitigate **all risks** to the SSSI.

7.5.36 KcCPC note the content of the paragraph

KcCPC note that "…achieved by placing a temporary bridge across the Leiston Drain, supported on abutments for the permanent culvert structure at the east end, while the full construction remains ongoing at the west. By comparison the bridge options would result in approximately a six-month delay to the overall construction programme." and assumes that a full risk assessment has been made by EDF of pursing this strategy and that **all detrimental risks** are fully mitigated. KcCPC respectfully request that EDF Energy make public the risk assessment and mitigations programme.

e) Land east of Eastlands Industrial Estate, including Sizewell Halt

7.5.37 KcCPC note the content of the paragraph

7.5.38 KcCPC note the content of the paragraph

7.5.39 KcCPC note the content of the paragraph

7.5.40 KcCPC note the content of the paragraph

KcCPC note that "…we have discounted the marine-maximised scenario and we are now consulting on a road-led strategy and a rail-led strategy." and would like to ascertain whether EDF Energy have considered a modern day 'Mulberry Harbour' approach to avoid/mitigate detrimental marine impacts?

7.5.41 KcCPC note the content of the paragraph and Table 7.6

7.5.42 KcCPC note the content of the paragraph

7.5.43 KcCPC note the content of the paragraph

7.5.44 KcCPC note the content of the paragraph

7.5.45 KcCPC note the content of the paragraph Table 7.7 and Table 7.8

7.5.46 KcCPC note the content of the paragraph

f) East of Bridleway 19 and north of Sizewell Marshes SSSI

Borrow pits and stockpiles

7.5.47 KcCPC note the content of the paragraph

7.5.48 KcCPC note the content of the paragraph

7.5.49 KcCPC note the content of the paragraph

7.5.50 KcCPC note the content of the paragraph

Stage 2 consultation feedback

7.5.51 KcCPC note the content of the paragraph

7.5.52 KcCPC note the content of the paragraph

7.5.53 KcCPC note the content of the paragraph

7.5.54 KcCPC note the content of the paragraph

7.5.55 KcCPC note the content of the paragraph

Proposed approach

7.5.56 KcCPC note the content of the paragraph

7.5.57 KcCPC note the content of the paragraph

7.5.58 KcCPC note the content of the paragraph

KcCPC is concerned that "…we now consider **on a precautionary basis** that the remaining three borrow pit fields should be included in the application for development consent to ensure that sufficient suitable material is available for the main platform." and respectfully suggest that good project management disciplines, strong logistics capabilities, combined with thorough and rigorous planning, would obviate the need for such a disproportionate contingency.

7.5.59 KcCPC note the content of the paragraph Figure 7.42 and Figure 7.43

Borrow pit and stockpile typical phasing

7.5.60 KcCPC note the content of the paragraph and Figure 7.44

Common user facilities and contractors' compounds

7.5.61 KcCPC note the content of the paragraph

7.5.62 KcCPC note the content of the paragraph

7.5.63 KcCPC note the content of the paragraph

Boundary treatments

7.5.64 KcCPC note the content of the paragraph

7.5.65 KcCPC note the content of the paragraph and Figure 7.45

7.5.66 KcCPC note the content of the paragraph and Figure 7.46

7.5.67 KcCPC note the content of the paragraph and Figure 7.47

g) North of Sizewell Gap

New electricity supply cable and substation

7.5.68 KcCPC note the content of the paragraph

7.5.69 KcCPC note the content of the paragraph and Figure 7.48

7.5.70 KcCPC note the content of the paragraph

h) West of Bridleway 19 and east of Abbey Road

Site entrance hub

7.5.71 KcCPC note the content of the paragraph

7.5.72 KcCPC note the content of the paragraph and Figure 7.49

7.5.73 KcCPC note the content of the paragraph

7.5.74 KcCPC note the content of the paragraph

7.5.75 KcCPC note the content of the paragraph

7.5.76 KcCPC note the content of the paragraph and Figure 7.49

7.5.77 KcCPC note the content of the paragraph

7.5.78 KcCPC note the content of the paragraph, Figure 7.31 and Figure 7.32

7.5.79 KcCPC note the content of the paragraph

i) Suffolk coast

Sea defences and rights of way

7.5.80 KcCPC note the content of the paragraph

7.5.81 KcCPC note the content of the paragraph and Figure 7.40

7.5.82 KcCPC note the content of the paragraph

7.5.83 KcCPC note the content of the paragraph

7.5.84 KcCPC note the content of the paragraph

7.5.85 KcCPC note the content of the paragraph

7.5.86 KcCPC note the content of the paragraph

7.5.87 KcCPC note the content of the paragraph

7.5.88 KcCPC note the content of the paragraph

7.5.89 KcCPC note the content of the paragraph

7.5.90 KcCPC note the content of the paragraph and Figure 7.50

Beach landing facility (BLF)

7.5.91 KcCPC note the content of the paragraph

Stage 2 consultation feedback

7.5.92 KcCPC note the content of the paragraph

7.5.93 KcCPC note the content of the paragraph

7.5.94 KcCPC note the content of the paragraph

Preferred approach

7.5.95 KcCPC note the content of the paragraph

7.5.96 KcCPC note the content of the paragraph

7.5.97 KcCPC note the content of the paragraph

7.5.98 KcCPC note the content of the paragraph

j) Site-wide infrastructure

7.5.99 KcCPC note the content of the paragraph

Drainage

Foul water drainage

7.5.100 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy during the construction stage to treat all sewage through a dedicated sewage treatment plant located north of the Leiston drain, discharging to the sea via combined drainage outfall.

Given the proximity of sensitive sites and ecologically important assets, KcCPC is concerned that EDF Energy provide a totally sealed sewage handling system, that is under continual monitoring and subject to random checks by the statutory authorities.

7.5.101 KcCPC note the content of the paragraph

Surface water drainage

7.5.102 KcCPC note the content of the paragraph

7.5.103 KcCPC note the content of the paragraph

7.5.104 KcCPC note the content of the paragraph

Combined drainage outfall

7.5.105 KcCPC note the content of the paragraph and Figure 7.52

Lighting

7.5.106 KcCPC note the content of the paragraph

KcCPC note that the Hinkley Point C lighting 'glow dome' is readily visible 4 miles distant (as the crow flies) 8 miles distant (via the road route).

Consequently, KcCPC is persuaded that EDF Energy must include detailed lighting plans for the main site (at each discrete construction phase) and a lighting plan for the operational phase of the Sizewell C power station, within any application made for a development order at the EDF Energy Sizewell estate.

In addition, where night hour working is planned at other sites (i.e. FMF, road alteration sites and/or construction sites, etc.) KcCPC also ajudge it necessary that lighting plans are agreed (for both the construction and operational phases), with the statutory authorities and residents and/or businesses directly impacted.

7.5.107 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.108 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.109 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.110 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

Main site access road from B1122 to the main platform

7.5.111 KcCPC note the content of the paragraph

7.5.112 KcCPC note the content of the paragraph

Haul roads

7.5.113 KcCPC note the content of the paragraph

7.5.114 KcCPC note the content of the paragraph

KcCPC note "haul roads need to safely accommodate the movement of the largest excavation haulage vehicles known as CAT 777s, typically 6.5m wide. The haul roads need to be approximately 30m wide in total, including safety bunds and drainage ditches."

Service roads

7.5.115 KcCPC note the content of the paragraph

k) Parameters during the construction phase

7.5.116 KcCPC note the content of the paragraph

KcCPC note that EDF Energy intend "Applying for flexibility within parameters (known as the Rochdale Envelope) …" and contend that without experiential evidence having been presented, this is potentially just another tactic to avoid scrutiny, rather than a pragmatic 'ask' borne on the basis of substantial and current evidence.

7.5.117 KcCPC note the content of the paragraph

l) Temporary impact on Sizewell Marshes SSSI

7.5.118 KcCPC note the content of the paragraph

Works associated with the main platform and SSSI crossing

7.5.119 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

National Grid works

7.5.120 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of National Grid (conducting work in connection with the Sizewell C development) into the SSSI

Works associated with the temporary construction area

7.5.121 KcCPC note the content of the paragraph and Figure 7.29

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

7.5.122 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

7.5.123 KcCPC note the content of the paragraph

7.5.124 KcCPC note the content of the paragraph and Figure 7.29

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

7.6 Accommodation Campus

a) Introduction

7.6.1 KcCPC note the content of the paragraph

7.6.2 KcCPC note the content of the paragraph

7.6.3 KcCPC note the content of the paragraph

7.6.4 KcCPC note the content of the paragraph

7.6.5 KcCPC note the content of the paragraph and Figure 7.53

7.6.6 KcCPC note the content of the paragraph and Figure 7.55

b) Site requirements

7.6.7 KcCPC note the content of the paragraph

c) Overview of Stage 2 feedback and response to consultation

7.6.8 KcCPC note the content of the paragraph

7.6.9 KcCPC note the content of the paragraph

7.6.10 KcCPC note the content of the paragraph

7.6.11 KcCPC note the content of the paragraph

7.6.12 KcCPC note the content of the paragraph and Table 7.9

d) Site description and proposed development

7.6.13 KcCPC note the content of the paragraph

7.6.14 KcCPC note the content of the paragraph Figure 7.53 and Figure 7.54

7.6.15 KcCPC note the content of the paragraph

7.6.16 KcCPC note the content of the paragraph

7.6.17 KcCPC note the content of the paragraph

7.6.18 KcCPC note the content of the paragraph and Figure 7.55

7.6.19 KcCPC note the content of the paragraph, Figure 7.56, Figure 7.57 and Figure 7.58

8. **Rail** (Volume 1, Pages 240 to 260)

8.1 Introduction

8.1.1 KcCPC note the content of the paragraph

a) Stage 2 consultation

8.1.2 KcCPC note the content of the paragraph

8.1.3 KcCPC note the content of the paragraph

8.1.4 KcCPC note the content of the paragraph

b) Stage 3 consultation

8.1.5 KcCPC note the content of the paragraph

8.1.6 KcCPC note the content of the paragraph

8.1.7 KcCPC note the content of the paragraph

8.1.8 KcCPC note the content of the paragraph

8.1.9 KcCPC note the content of the paragraph

8.1.10 KcCPC note the content of the paragraph

8.1.11 KcCPC note the content of the paragraph and Table 8.1

8.2 Summary of rail proposals (rail-led strategy)

a) Early years

8.2.1 KcCPC note the content of the paragraph

8.2.2 KcCPC note the content of the paragraph

b) Main construction phase

8.2.3 KcCPC note the content of the paragraph

8.2.4 KcCPC note the content of the paragraph

c) Other rail improvements

8.2.5 KcCPC note the content of the paragraph

8.2.6 KcCPC note the content of the paragraph and Figure 8.1

d) Post-operation

8.2.7 KcCPC note the content of the paragraph

8.2.8 KcCPC note the content of the paragraph

8.2.9 KcCPC note the content of the paragraph

8.3 Sizewell Halt or new siding (rail-led strategy)

a) Option 1: Sizewell Halt

8.3.1 KcCPC note the content of the paragraph

8.3.2 KcCPC note the content of the paragraph

8.3.3 KcCPC note the content of the paragraph

8.3.4 KcCPC note the content of the paragraph

8.3.5 KcCPC note the content of the paragraph

8.3.6 KcCPC note the content of the paragraph and Figure 8.2

8.3.7 KcCPC note the content of the paragraph and Figure 8.3

8.3.8 KcCPC note the content of the paragraph and Figure 8.3

8.3.9 KcCPC note the content of the paragraph

b) Option 2: New rail siding

8.3.10 KcCPC note the content of the paragraph

8.3.11 KcCPC note the content of the paragraph

8.3.12 KcCPC note the content of the paragraph

8.3.13 KcCPC note the content of the paragraph

8.3.14 KcCPC note the content of the paragraph

8.3.15 KcCPC note the content of the paragraph

8.4 Green rail route (rail-led strategy)

a) Consultation response and rationale for selection

8.4.1 KcCPC note the content of the paragraph

8.4.2 KcCPC note the content of the paragraph

8.4.3 KcCPC note the content of the paragraph

8.4.4 KcCPC note the content of the paragraph

b) Site description

8.4.5 KcCPC note the content of the paragraph

8.4.6 KcCPC note the content of the paragraph and Figure 8.5

8.4.7 KcCPC note the content of the paragraph

8.4.8 KcCPC note the content of the paragraph

8.4.9 KcCPC note the content of the paragraph

8.4.10 KcCPC note the content of the paragraph

8.4.11 KcCPC note the content of the paragraph

c) Proposals

8.4.12 KcCPC note the content of the paragraph, Figure 8.6 and Figure 8.7

8.4.13 KcCPC note the content of the paragraph

Saxmundham Road to Buckleswood Road

8.4.14 KcCPC note the content of the paragraph

8.4.15 KcCPC note the content of the paragraph

8.4.16 KcCPC note the content of the paragraph

8.4.17 KcCPC note the content of the paragraph

8.4.18 KcCPC note the content of the paragraph

8.4.19 KcCPC note the content of the paragraph and Figure 8.6

8.4.20 KcCPC note the content of the paragraph and Figure 8.7

8.4.21 KcCPC note the content of the paragraph

Buckleswood Road to the B1122 (Abbey Road)

8.4.22 KcCPC note the content of the paragraph

8.4.23 KcCPC note the content of the paragraph and Figure 8.8

8.4.24 KcCPC note the content of the paragraph

8.4.25 KcCPC note the content of the paragraph

8.4.26 KcCPC note the content of the paragraph

8.4.27 KcCPC note the content of the paragraph

8.4.28 KcCPC note the content of the paragraph

8.4.29 KcCPC note the content of the paragraph

8.4.30 KcCPC note the content of the paragraph and Figure 8.6

8.4.31 KcCPC note the content of the paragraph

8.4.32 KcCPC note the content of the paragraph

B1122 (Abbey Road) to the main development site

8.4.33 KcCPC note the content of the paragraph

8.4.34 KcCPC note the content of the paragraph

d) Construction and operational considerations

8.4.35 KcCPC note the content of the paragraph

8.4.36 KcCPC note the content of the paragraph

KcCPC note the maximum permissible speed is 25mph

8.4.37 KcCPC note the content of the paragraph and Figure 8.6

8.5 Upgrades to the East Suffolk line (rail-led strategy)

8.5.1 KcCPC note the content of the paragraph

8.5.2 KcCPC note the content of the paragraph

8.5.3 KcCPC note the content of the paragraph

KcCPC is very supportive of a rail-led strategy, but believes there is tremendous potential for a more ambitious approach than the Stage 3 proposals, based on heavier investment in enduring infrastructure, utilisation of night time movements, increased rail-head infrastructure at Leiston and broader discussions with both the rail operator (Greater Anglia) and Railtrack.

For example, have EDF Energy examined options with Greater Anglia including;

- Providing a southbound return shuttle train service between Lowestoft and Darsham
- Providing direct southbound travel via 'express' bus services between Darsham and stations to Ipswich
- Providing direct northbound travel 'express' bus services between Ipswich and all stations including Saxmundham to Darsham to pick up the northbound trains

A pedestrian link to Darsham Park and Ride could avoid congestion at Darsham station with turnaround buses.

Direct services from and to Darsham would avoid the problems associated with multi-drop 'rail replacement services'.

The size of buses providing services could be flexed to reflect destination demand, combined with service capacity at different times of the day (i.e. minibus, compact coach, coach and double decked buses).

KcCPC recognise that there would be an impact on average journey times, but believes correctly run these impacts could be minimised, whilst maintaining a valuable service up and down the Suffolk Coastal route.

In essence, this type of strategy could release the Ipswich to Saxmundham track for further investment and use as a short to medium rail based 'materials artery' directly to the Sizewell main site and Sizewell Halt.

In suggesting this sort of approach, KcCPC understand they are open to criticism.

However, KcCPC believes that this type of thinking and open-mindedness is the only way to avoid the inevitable road crisis that will occur should; a Sizewell C road-led strategy, or even the currently proposed rail-led strategy be pursued.

KcCPC is mindful that a 'perfect storm' is building along the A14/A12 routes comprising:

- Sizewell C construction
- Increased signalisation of the A12
- Increasing Capacity/Volume A14 congestion

- SCDC's Local Plan 10,000 house building programme including Brightwell Lakes and Felixstowe and Saxmundham Garden Village initiatives
- Scottish Power Renewables Schemes (x4)
- SCDC's ambition for 'year round' tourism
- Increased commutes from SCDC Local Plan delivered housing to Martlesham, Ipswich & Felixstowe
- Traditional activity driven Felixstowe Port development
- The new RORO Felixstowe Port Developments

It is unconscionable to pursue individual strands of this outlook, without stepping back and examining the collective short and medium-term threats that they pose to; the environment, businesses, residents, visitors, and the health of individuals.

In the long term, KcCPC can visualise lasting damage being sustained to; infrastructure, flora, fauna and public health that may takes tens of years, if ever, to fully recover from.

Consequently, however unpopular, KcCPC feel it is incumbent on them to suggest what may currently viewed as unthinkable.

8.5.4 KcCPC note the content of the paragraph

8.5.5 KcCPC note the content of the paragraph

a) Passing loop

8.5.6 KcCPC note the content of the paragraph

8.5.7 KcCPC note the content of the paragraph

8.5.8 KcCPC note the content of the paragraph

8.5.9 KcCPC note the content of the paragraph and Figure 8.9

b) Saxmundham crossover

8.5.10 KcCPC note the content of the paragraph and Figure 8.10

8.5.11 KcCPC note the content of the paragraph

8.5.12 KcCPC note the content of the paragraph and Figure 8.10

c) Signalling

8.5.13 KcCPC note the content of the paragraph

d) Level Crossings

8.5.14 KcCPC note the content of the paragraph

KcCPC note the increase in freight train speed to 40mph

8.5.15 KcCPC note the content of the paragraph

e) Bridge strengthening

8.5.16 KcCPC note the content of the paragraph

8.6 Upgrades to the Saxmundham to Leiston branch line (rail-led strategy)

8.6.1 KcCPC note the content of the paragraph

a) Track repairs or replacement

8.6.2 KcCPC note the content of the paragraph

8.6.3 KcCPC note the content of the paragraph

b) Level crossings

8.6.4 KcCPC note the content of the paragraph

8.6.5 KcCPC note the content of the paragraph

8.7 Rail works required for a road-led strategy

a) Option 1: Sizewell Halt (road-led strategy)

8.7.1 KcCPC note the content of the paragraph

b) Option 2: New rail siding on land east of the Eastlands Industrial Estate (road-led strategy)

8.7.2 KcCPC note the content of the paragraph

c) Upgrades to the East Suffolk line (road-led strategy)

8.7.3 KcCPC note the content of the paragraph

8.7.4 KcCPC note the content of the paragraph

8.7.5 KcCPC note the content of the paragraph

d) Upgrades to the Saxmundham to Leiston branch line (road-led strategy)

8.7.6 KcCPC note the content of the paragraph

8.7.7 KcCPC note the content of the paragraph

e) Post-operation (road-led strategy)

8.7.8 KcCPC note the content of the paragraph

8.7.9 KcCPC note the content of the paragraph

8.8 Consenting strategy

8.8.1 KcCPC note the content of the paragraph and Table 8.1

8.8.2 KcCPC note the content of the paragraph

8.8.3 KcCPC note the content of the paragraph

9 Level Crossings (Volume 1, Pages 261 to 310)

9.1 Introduction

9.1.1 KcCPC note the content of the paragraph

9.1.2 KcCPC note the content of the paragraph

9.1.3 KcCPC note the content of the paragraph

9.1.4 KcCPC note the content of the paragraph

9.2 Types of level crossing

9.2.1 KcCPC note the content of the paragraph and Table 9.1

9.3 Level crossing works required for a rail-led strategy

9.3.1 KcCPC note the content of the paragraph

9.3.2 KcCPC note the content of the paragraph and Table 9.2

9.3.3 KcCPC note the content of the paragraph

a) East Suffolk line

9.3.4 KcCPC note the content of the paragraph

9.3.5 KcCPC note the content of the paragraph

b) Proposed closures along the East Suffolk line

9.3.6 KcCPC note the content of the paragraph

9.3.7 KcCPC note the content of the paragraph

Westerfield Footpath

9.3.8 KcCPC note the content of the paragraph and Figure 9.1

9.3.9 KcCPC note the content of the paragraph

Diversion Option 1

9.3.10 KcCPC note the content of the paragraph and Figure 9.2

Diversion Option 2

9.3.11 KcCPC note the content of the paragraph and Figure 9.3

Diversion Option 3

9.3.12 KcCPC note the content of the paragraph and Figure 9.4

Lacy's Footpath

9.3.13 KcCPC note the content of the paragraph and Figure 9.5

9.3.14 KcCPC note the content of the paragraph and Figure 9.6

Stennetts 1

9.3.15 KcCPC note the content of the paragraph and Figure 9.7

9.3.16 KcCPC note the content of the paragraph and Figure 9.8

Stennetts 2

9.3.17 KcCPC note the content of the paragraph and Figure 9.9

9.3.18 KcCPC note the content of the paragraph

Diversion Option 1

9.3.19 KcCPC note the content of the paragraph and Figure 9.10

Diversion Option 2

9.3.20 KcCPC note the content of the paragraph and Figure 9.11

Diversion Option 3

9.3.21 KcCPC note the content of the paragraph and Figure 9.12

Gamekeepers

9.3.22 KcCPC note the content of the paragraph and Figure 9.13

9.3.23 KcCPC note the content of the paragraph and Figure 9.14

Martlesham

9.3.24 KcCPC note the content of the paragraph and Figure 9.15

9.3.25 KcCPC note the content of the paragraph

Diversion Option 1

9.3.26 KcCPC note the content of the paragraph and Figure 9.16

Diversion Option 2

9.3.27 KcCPC note the content of the paragraph and Figure 9.17

Melton Bromswell

9.3.28 KcCPC note the content of the paragraph and Figure 9.18

9.3.29 KcCPC note the content of the paragraph

Diversion Option 1

9.3.30 KcCPC note the content of the paragraph and Figure 9.19

Diversion Option 2

9.3.31 KcCPC note the content of the paragraph and Figure 9.20

Diversion Option 3

9.3.32 KcCPC note the content of the paragraph and Figure 9.21

Diversion Option 4

9.3.33 KcCPC note the content of the paragraph and Figure 9.22

Diversion Option 5

9.3.34 KcCPC note the content of the paragraph and Figure 9.23

9.3.35 KcCPC note the content of the paragraph

Pettistree

9.3.36 KcCPC note the content of the paragraph and Figure 9.24

9.3.37 KcCPC note the content of the paragraph

Diversion Option 1

9.3.38 KcCPC note the content of the paragraph and Figure 9.25

Diversion Option 2

9.3.39 KcCPC note the content of the paragraph and Figure 9.26

Orchard

9.3.40 KcCPC note the content of the paragraph and Figure 9.27

9.3.41 KcCPC note the content of the paragraph and Figure 9.28

Wickham Market

9.3.42 KcCPC note the content of the paragraph and Figure 9.29

9.3.43 KcCPC note the content of the paragraph

Diversion Option 1

9.3.44 KcCPC note the content of the paragraph and Figure 9.30

Diversion Option 2

9.3.45 KcCPC note the content of the paragraph and Figure 9.31

Blaxhall 2

9.3.46 KcCPC note the content of the paragraph and Figure 9.32

9.3.47 KcCPC note the content of the paragraph

Diversion Option 1

9.3.48 KcCPC note the content of the paragraph and Figure 9.33

Diversion Option 2

9.3.49 KcCPC note the content of the paragraph and Figure 9.34

Saxmundham

9.3.50 KcCPC note the content of the paragraph and Figure 9.35

9.3.51 KcCPC note the content of the paragraph and Figure 9.36

c) Upgrades along the East Suffolk line

9.3.52 KcCPC note the content of the paragraph

9.3.53 KcCPC note the content of the paragraph

9.3.54 KcCPC note the content of the paragraph

Westerfield

9.3.55 KcCPC note the content of the paragraph and Figure 9.37

9.3.56 KcCPC note the content of the paragraph

9.3.57 KcCPC note the content of the paragraph and Figure 9.38

Bealings

9.3.58 KcCPC note the content of the paragraph and Figure 9.39

9.3.59 KcCPC note the content of the paragraph and Figure 9.40

Ferry Quay

9.3.60 KcCPC note the content of the paragraph and Figure 9.41

9.3.61 KcCPC note the content of the paragraph

9.3.62 KcCPC note the content of the paragraph and Figure 9.42

Haywards/Tide Mill Way

9.3.63 KcCPC note the content of the paragraph and Figure 9.43

9.3.64 KcCPC note the content of the paragraph

9.3.65 KcCPC note the content of the paragraph and Figure 9.44

Lime Kiln Quay and Sun Wharf

9.3.66 KcCPC note the content of the paragraph and Figure 9.45 and Figure 9.46

9.3.67 KcCPC note the content of the paragraph

9.3.68 KcCPC note the content of the paragraph and Figure 9.47

Melton Station

9.3.69 KcCPC note the content of the paragraph and Figure 9.48

9.3.70 KcCPC note the content of the paragraph

9.3.71 KcCPC note the content of the paragraph and Figure 9.49

Ufford

9.3.72 KcCPC note the content of the paragraph and Figure 9.50

9.3.73 KcCPC note the content of the paragraph

9.3.74 KcCPC note the content of the paragraph and Figure 9.51

Blaxhall 1

9.3.75 KcCPC note the content of the paragraph and Figure 9.52

9.3.76 KcCPC note the content of the paragraph

9.3.77 KcCPC note the content of the paragraph and Figure 9.53

Beversham

9.3.78 KcCPC note the content of the paragraph and Figure 9.54

9.3.79 KcCPC note the content of the paragraph

9.3.80 KcCPC note the content of the paragraph and Figure 9.55

d) Miniature stop light upgrades along the East Suffolk line

9.3.81 KcCPC note the content of the paragraph

9.3.82 KcCPC note the content of the paragraph

9.3.83 KcCPC note the content of the paragraph

Lox Farm

9.3.84 KcCPC note the content of the paragraph and Figure 9.56

Notcutts Nursery

9.3.85 KcCPC note the content of the paragraph and Figure 9.57

Kingston Farm

9.3.86 KcCPC note the content of the paragraph and Figure 9.58

Jetty Avenue

9.3.87 KcCPC note the content of the paragraph and Figure 9.59

9.3.88 KcCPC note the content of the paragraph and Figure 9.60

Maltings

9.3.89 KcCPC note the content of the paragraph and Figure 9.61

9.3.90 KcCPC note the content of the paragraph and Figure 9.62

Melton Sewage

9.3.91 KcCPC note the content of the paragraph and Figure 9.63

Dock Lane

9.3.92 KcCPC note the content of the paragraph and Figure 9.64

Bloss

9.3.93 KcCPC note the content of the paragraph and Figure 9.65

9.3.94 KcCPC note the content of the paragraph and Figure 9.66

Ellingers

9.3.95 KcCPC note the content of the paragraph and Figure 9.67

Uffold

9.3.96 KcCPC note the content of the paragraph and Figure 9.68

Blackstock

9.3.97 KcCPC note the content of the paragraph and Figure 9.69

Red House Farm

9.3.98 KcCPC note the content of the paragraph and Figure 9.70

Snape

9.3.99 KcCPC note the content of the paragraph and Figure 9.71

Farnham

9.3.100 KcCPC note the content of the paragraph and Figure 9.72

Benhall/Grays Lane

9.3.101 KcCPC note the content of the paragraph and Figure 9.73

9.3.102 KcCPC note the content of the paragraph

Brick Kiln

9.3.103 KcCPC note the content of the paragraph and Figure 9.74

9.3.104 KcCPC note the content of the paragraph and Figure 9.75

e) Upgrades along the Saxmundham to Leiston branch line

9.3.105 KcCPC note the content of the paragraph

9.3.106 KcCPC note the content of the paragraph and Table 9.3

9.3.107 KcCPC note the content of the paragraph and Figure 9.76

9.3.108 KcCPC note the content of the paragraph

Knodishall

9.3.109 KcCPC note the content of the paragraph and Figure 9.77

West House

9.3.110 KcCPC note the content of the paragraph and Figure 9.78

9.3.111 KcCPC note the content of the paragraph

9.3.112 KcCPC note the content of the paragraph and Figure 9.79

Saxmundham Road

9.3.113 KcCPC note the content of the paragraph and Figure 9.80

9.3.114 KcCPC note the content of the paragraph

9.3.115 KcCPC note the content of the paragraph and Figure 9.81

Leiston

9.3.116 KcCPC note the content of the paragraph and Figure 9.82

9.3.117 KcCPC note the content of the paragraph

9.3.118 KcCPC note the content of the paragraph and Figure 9.83

Sizewell

9.3.119 KcCPC note the content of the paragraph and Figure 9.84

9.3.120 KcCPC note the content of the paragraph

KcCPC note an incorrect reference to "Due to the wide carriageway and adjacent road of Westward Ho, three…"

9.3.121 KcCPC note the content of the paragraph and Figure 9.85

f) Miniature stop light upgrades along the Saxmundham to Leiston branch line

9.3.122 KcCPC note the content of the paragraph

9.3.123 KcCPC note the content of the paragraph

9.3.124 KcCPC note the content of the paragraph

Bratts Black House

9.3.125 KcCPC note the content of the paragraph and Figure 9.86

Snowdens

9.3.126 KcCPC note the content of the paragraph and Figure 9.87

Buckles Wood

9.3.127 KcCPC note the content of the paragraph and Figure 9.88

Summerhill

9.3.128 KcCPC note the content of the paragraph and Figure 9.89

9.4 Level crossing works required for a road-led strategy

a) Upgrades to the East Suffolk line

9.4.1 KcCPC note the content of the paragraph

9.4.2 KcCPC note the content of the paragraph

9.4.3 KcCPC note the content of the paragraph

b) Upgrades to the Saxmundham to Leiston branch line

9.4.4 KcCPC note the content of the paragraph

9.4.5 KcCPC note the content of the paragraph and Table 9.4

9.5 Primary Construction Compounds

9.5.1 KcCPC note the content of the paragraph

9.5.2 KcCPC note the content of the paragraph

a) Westerfield Station primary compound

9.5.3 KcCPC note the content of the paragraph and Figure 9.90

9.5.4 KcCPC note the content of the paragraph

9.5.5 KcCPC note the content of the paragraph

b) Passing loop primary compound

9.5.6 KcCPC note the content of the paragraph and Figure 9.91

9.5.7 KcCPC note the content of the paragraph

c) Saxmundham Crossover primary compound

9.5.8 KcCPC note the content of the paragraph and Figure 9.92

9.5.9 KcCPC note the content of the paragraph

10 **Sizewell Link Road** (Volume 1, Pages 311 to 323)

10.1 Introduction

10.1.1 KcCPC note the content of the paragraph

KcCPC is concerned that EDF Energy's proposed Sizewell Link road comes as a very late, ill-conceived addition to a fundamentally unsound road-led proposal, that is not sustainable.

There are five principal themes that lead KcCPC to this conclusion:

a] Sizewell C is not happening in 'a vacuum' and cumulative impacts cannot be ignored or dismissed

b] Small 'mitigation schemes' do not address the fundamental deficiencies of the A12

c] Traffic modelling (where clear and discernible) does not appear to reflect the observed realities of the A12

d] Suffolk Coastal residents must be able to 'live and flourish', not just 'survive' any Sizewell C construction

e] The Suffolk Coastal economy is highly dependent on tourism (6.3 million tourist trips in 2017) …

KcCPC build on these themes throughout their.

10.1.2 KcCPC note the content of the paragraph

KcCPC note that EDF Energy assert that "Under the road-led strategy, we estimate that there would be an average of 375 Heavy Goods Vehicle (HGV) movements per day…" contrary to elsewhere in the Stage 3 Consultation (i.e. Table 6.1 – Line 8) where it is clearly stated:

Typical day – average number of HGVs per day at peak construction	Rail-led 450 movements (225 deliveries) **Road-led 750 movements (375 deliveries)**

KcCPC note throughout the Stage 3 consultation documents, EDF Energy use 'vehicles', 'movements' and 'deliveries', in some places as though they are interchangeable when they clearly are not.

These errors (or misinformation?) have made it very difficult for the reader to take tables and narrative at 'face value' as there is a high degree of checking necessary to ascertain what is being indicated.

KcCPC note that "…councils at Yoxford, Theberton and Middleton-cum-Fordley, together with the Theberton and Eastbridge Action Group on Sizewell, were strongly opposed at Stage 2 to using the B1122 as…" and also note, EDF Energy do not develop the views expressed by these Councils or the alternatives strategies that were brought forward.

KcCPC also note that EDF Energy recognise "that the environmental impacts from, in particular, noise, vibration and severance from the Sizewell C traffic would require mitigation under the road-led strategy." and that "…the B1122 is not close to its traffic carrying capacity.".

10.1.3 KcCPC note the content of the paragraph

KcCPC is absolutely clear that the Sizewell Link proposal coming forward from EDF Energy at Stage 3 is totally unacceptable. It is not thought through, puts valuable, good quality agricultural land under tarmac, destroys wildlife habitats, only to complete the encircling of the communities that, EDF Energy claim to be helping.

Moreover, it comes at the end of a tortuous 30-mile journey (Figure 1), from either of proposed Freight Management Facilities, on or adjacent to the A14 east of the A12 junction.

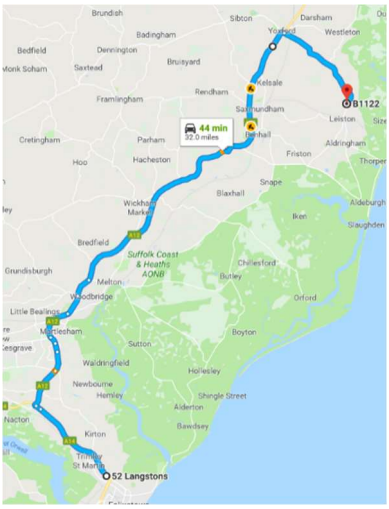


Figure 1

The soundness of any proposal to take such an enormous HGV burden, so far north, for such a protracted period of time has to be called into question when considered alone, but fold in the other considerations and the absurdity becomes self-evident. KcCPC will explore some of the other considerations in due course.

10.1.4 KcCPC note the content of the paragraph

KcCPC is puzzled as to why no rationale has been given for the siting of the proposed westerly roundabout (giving access to EDF Energy's proposed Sizewell Link road), at the highest point of the A12 between Kelsale cum Carlton and Yoxford.

Moreover, it notes that as positioned, it is designed to detrimentally impact the northern boundary of Kelsale cum Carlton Parish, a rural area rich with wildlife habitats, ecological assets, small businesses and good, productive agricultural land.

KcCPC also note that pre-publication of the Stage 3 consultation, EDF Energy did not engage with either the Parish Council or those residents of Kelsale Cum Carlton directly impacted. Indeed, it appears that EDF Energy's agents may have misled some Kelsale cum Carlton residents in obtaining data from them for a 'subsequent mailing', whilst others were not contacted, before or after publication.

10.1.5 KcCPC note the content of the paragraph

KcCPC note the EDF Energy intention to move (on a daily basis):

- 85% of HGV 'deliveries' north on the A12 from a Freight Management Facility adjoining or adjacent to the A14

- presumably route HGV 'returns' via the direction of origin (although not clear in the Stage 3 documents?)

- 80+ Mail Consolidation LGV movements north on the A12 from Wickham Market P&R

- 80+ Mail Consolidation LGV movements south on the A12 to Wickham Market P&R

- 500+ LGV movements with unclear routing

- 250 + bus movements to and from the Southern Park and Ride at Wickham Market

- an unquantified number of workforce cars routing to Wickham Market P&R or Darsham P&R or Sizewell C Main
site and/or campus/campsite

Consequently, whilst it is self-evident the proposed EDF Energy Sizewell Link road would "…substantially reduce traffic flow through the village of Yoxford.", it is the contention of KcCPC that the inability of EDF

Energy to tackle more fundamental issues of an A12 based route, means in excess of 15,000 unnecessary miles (mostly diesel fuelled) will be undertaken each day.

10.1.6 KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion regarding the potential benefit to villages on the B1122, but point out that the proposed route of the EDF Energy Sizewell Link road would effectively mean much of the housing on or close to the B1122 would have vehicles passing to the north (B1122) and to the south (EDG Energy Sizewell Link road).

10.1.7 KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that "…construction of the Sizewell link road under the road-led strategy would substantially reduce traffic volumes passing through Yoxford, Middleton Moor and Theberton, resulting in the reduction in noise, vibration and severance impacts. This would provide a major and permanent legacy benefit…" but point out that from the A12 north of Yoxford a not in considerable volume of traffic would continue flow (and presumably return), comprising a minimum of 15% of total HGV traffic, self-routing LGV traffic, Park and Ride buses and workforce traffic.

10.1.8 KcCPC note the content of the paragraph

10.2 Scheme requirements

10.2.1 KcCPC note the content of the paragraph

KcCPC understand the rationale behind the claim made by EDF Energy regarding driver behaviour and "…an important factor in encouraging the use of the Sizewell link road is that drivers generally choose routes to their destination which minimise their journey time. Therefore, the most sustainable solution to relieve the B1122 of Sizewell C construction traffic would be for the route of any new link road from the A12 to be as short as is practical.". However, the shortest physical route may not be the quickest, as EDF Energy identify when make comment on the degree of self-routing likely to occur on the southern end of the A12 near Woodbridge.

KcCPC understand this behaviour may be occasioned by the increase in the relatively slow moving Sizewell C HGV traffic, something that could also apply in the case of the EDF Energy Sizewell Link road and the B1122 routes.

10.2.2 KcCPC note the content of the paragraph

KcCPC take issue with the contention that "The new link road must therefore start at the A12, between Yoxford and south of Saxmundham, and end on the B1122 east of Theberton, close to the main construction site entrance. It needs to provide relief to Yoxford, Middleton Moor and Theberton…" as this is not a binary decision.

As pointed out earlier in this response, the fundamental issues of a Sizewell C construction route utilising the A12 along most of its length, are far more onerous than those implied by the simplistic approach being taken by EDF Energy.

The A12 is not a trunk road, having been previously de-trunked. It is the only direct link along the East coast of Suffolk between Felixstowe and Ipswich in the south and Lowestoft in the north.

Moreover, it is the eastern most 'core' bearer of cross county traffic, with much of the traffic linking to 'west of A12' locations via short link journeys on the A12, and vice versa for traffic to 'east of A12' locations. It is also the primary access point for access to Norwich and via the A47 Lincolnshire and beyond.

However, as is self-evident, it still comprises significant stretches of historic single carriageway with little or no passing opportunities.

The surrounding road network to the A12 (especially north of Woodbridge), despite the contention of EDF Energy, is not well suited to self-routing and because of seasonally driven use by tourist and agricultural traffic, can be subject to 'snap congestion' events, leading to short/medium duration tailbacks and a shortage of safe overtaking. KcCPC also note that, much of the surrounding road network rapidly decays from A road, to B road to single track roads with limited passing, thereby making alternative HGV routing complex and dangerous.

In that connection, whilst KcCPC welcome a Traffic Incident Management Area at Wickham Market, it believes that the anatomy of the A12 is such that this provision is totally inadequate, and will need to be replicated elsewhere along the A12 route as accessibility will become a critical issue and one already observed as being severe in some cases.

KcCPC note and welcome the involvement of the Suffolk Constabulary and the East of England Ambulance service in discussions on the A12 and dealing with some incident type. However, KcCPC is unclear whether this involvement has been extended to the Fire Service and the Coastguard as they too have need to use the A12 on occasion.

As a result of these and other concerns, KcCPC have compiled a list of regular and irregular events observed on the A12, that will (statistically at least) or may occur during the construction of Sizewell C. It includes:

Planned Highways carriageway closure (single carriageway)
Planned Highways carriageway closure (dual carriageway)
Unplanned Highways carriageway closure (single carriageway)
Unplanned Highways carriageway closure (dual carriageway)
Scheduled dustbin collections (Single carriageway)
Emergency Services – ceding priority (Single carriageway)
Scheduled utility access to carriageway (Single carriageway)
Scheduled utility access to carriageway (Dual carriageway)
Emergency utility access to carriageway (Single carriageway)
Emergency utility access to carriageway (Dual carriageway)
HGV tyre loss (Single Carriageway)
HGV tyre loss (Dual Carriageway)
HGV breakdown (Single Carriageway)
HGV breakdown (Dual Carriageway)
Car tyre loss (Single Carriageway)
Car tyre loss (Dual Carriageway)
Car breakdown (Single Carriageway)
Car breakdown (Dual Carriageway)
LGV tyre loss (Single Carriageway)
LGV tyre loss (Dual Carriageway)
LGV breakdown (Single Carriageway)
LGV breakdown (Dual Carriageway)
Partial load loss – HGV (Single Carriageway)
Total load loss – HGV (Single Carriageway)
Partial load loss – LGV (Single Carriageway)
Total load loss – LGV (Single Carriageway)
Partial load loss – HGV (Dual Carriageway)
Total load loss – HGV (Dual Carriageway)
Partial load loss – LGV (Dual Carriageway)
Total load loss – LGV (Dual Carriageway)
Hazardous spill – HGV (Single Carriageway)
Hazardous spill – LGV (Single Carriageway)
Hazardous spill – HGV (Dual Carriageway)
Hazardous spill – LGV (Dual Carriageway)
Police – Traffic Incident Investigation (Single Carriageway)
Police – Traffic Incident Investigation (Dual Carriageway)
Vehicle Fire (Single Carriageway)
Vehicle Fire (Dual Carriageway)
Roadside Fire (Single Carriageway)

Roadside Fire (Dual Carriageway)
Adjacent Field/Woodland Fire (Single Carriageway)
Adjacent Field/Woodland Fire (Dual Carriageway)
Fatal Traffic Accident (Single Carriageway)
Fatal Traffic Accident (Dual Carriageway)
Carriageway Flooding (Single Carriageway)
Carriageway Flooding (Dual Carriageway)
Emergency Carriageway Repair (Single Carriageway)
Emergency Carriageway Repair (Dual Carriageway)
Single agricultural vehicle (Single Carriageway)
Single agricultural vehicle (Dual Carriageway)
Potato/Beet harvesting convoy (Single Carriageway)
Potato/Beet harvesting convoy (Dual Carriageway)
Steam powered slow moving vehicle (Single Carriageway)
Steam powered slow moving vehicle (Dual Carriageway)
Steam powered vehicle breakdown (Single Carriageway)
Steam powered vehicle breakdown (Dual Carriageway)
Wide/Exceptional (non-Sizewell C) Loads (Single Carriageway)
Wide/Exceptional (non-Sizewell C) Loads (Dual Carriageway)
Wide/Exceptional (non-Sizewell C) Overnight lay-ups (Single Carriageway)
Wide/Exceptional (non-Sizewell C) Overnight lay-ups (Dual Carriageway)
Folk East Festival traffic (build up, event, clear down)
Latitude Festival traffic (build up, event, clear down)
Blaxhall Motocross traffic (build up, event, clear down)

10.2.3 KcCPC note the content of the paragraph

KcCPC is ill equipped to either contest or confirm the EDF Energy assertion that "…the design capacity of a new single carriageway road is 13,000 vehicles per day (Ref. 10.1). The traffic flows predicted to use a link road, as set out in Chapter 6 of this volume, are significantly lower than this with up to **2,300 vehicles** expected to use the road during the peak construction period…" because, as identified elsewhere in this response EDF Energy seem unable to be consistent in the use of movements, deliveries, departures and vehicles when referring to road forecasts and/or capacity.

However, on the assumption that a 'vehicle' is equivalent to a 'movement' KcCPC anticipate the traffic forecast on the EDF Energy proposed Sizewell link, at peak construction, under a road-lead option to comprise at least:

HGV deliveries to Main Site	750
HGV departures from Main Site	750
Bus movements per day	500+
LGV movements	700
Workforce movements	500+(?) estimate only
Other traffic	500+(?) estimate only
Total	**3,700+**

10.3 Scheme requirements

10.3.1 KcCPC note the content of the paragraph

As pointed out earlier in this response, the fundamental issues of a Sizewell C construction route utilising the A12 along most of its length, are far more onerous than those implied by the simplistic approach being taken by EDF Energy.

Consequently, KcCPC repeat that, the simplicity with which EDF Energy assert that "There are a number of environmental designations and constraints which affect the options for route alignment considered by EDF Energy…" and "key environmental considerations that are likely to arise from the construction and operation of the new link road as well as identifying potential measures which may be required to avoid or mitigate

potential effects. It also sets out the next steps which will inform the ongoing development of the link road proposal…" is not strictly the case, approximating as it does to, the number of ways to thread a needle!

The stark reality is that EDF Energy fully understands the limitations of an A12 based route, and have wilfully manufactured a situation where mitigating issues (of its own construction) in respect to the B1122 is being brought forward as the 'game changer'. It clearly is not!

However, in so doing EDF Energy hope to evade three compelling realities face on:

A] Without a marine or significantly more ambitious rail fulfilled construction programme, any road-led Proposal may prove unsustainable.

B] The cumulative traffic impacts of projects reliant on the A12 as a primary delivery mechanism, combined with East Suffolk's housing commitment to Government and its ambitions for 'year-round' tourism are far greater than anticipated. The further obstacle of A14 congestion at J58, combined with Felixstowe expansion and a new RoRo initiative just add unwelcome complications to a untenable logistics management task.

C] As a complex project (and arguably the most challenging) toward the northern end of East Suffolk, mitigating both risks and impacts in this environment may jeopardise timely delivery of Sizewell C, without further significant investment, potentially compromising the current business and investment case.

10.3.2 KcCPC note the content of the paragraph

10.3.3 KcCPC note the content of the paragraph and Figure 10.1

KcCPC is once again concerned that EDF Energy, although not compelled too, did not have the courtesy to contact KcCPC prior to publishing proposed routings through the Parish that, may not only impact the designated Conservation Area, but also a potential roadside nature reserve.

Moreover, KcCPC note the disdain that EDF Energy have repeatedly demonstrated for the Parish Council and residents of the Parish in referring to the western end of the proposed EDF Energy Sizewell Link road as "…south of Yoxford…" rather than the correct attribution as the northern edge of Kelsale cum Carlton. Hardly an oversight when repeatedly omitted and yet located so close to the A12 village sign?

For the avoidance of doubt, KcCPC and its residents (after a Public meeting and data gathering via a questionnaire) are:

- in principle, in favour of a rail-led strategy, but unable to offer their full support to the strategy brought forward at Stage 3, as it believes the proposal lacks ambition and is a sub-optimal solution to a substantive need.
- opposed to the road-led strategy brought forward at Stage 3.
- opposed to the EDF Energy Sizewell Link road option brought forward at Stage 3.
- opposed to all further link road options (current or new) until EDF Energy objectively review the sustainability of any proposals, where the majority of the route is dependent on a largely unmodified A12 and is host to the multiplicity of projects currently under consideration, or already approved. Moreover, KcCPC would expect EDF Energy's modelling to fully reflect the burden of tourist traffic.

10.3.4 KcCPC note the content of the paragraph

KcCPC wish it to be noted that it is host to roadside nature reserves and also contains Carlton Park, a Non-Designated Heritage Asset. Although not adjacent to the proposed route, along with the Conservation Area they are constituents of an important landscape, as identified in research undertaken prior to the Conservation Area's designation.

KcCPC also confirm that the Parish's bio-diversity group, having undertaken a number of investigations confirm the existence of Greater Crested Newt colonies across the Parish, along with a wide range of flora and fauna noted in local and national 'lists' as being in decline or at varying degrees of risk.

10.3.5 KcCPC note the content of the paragraph

KcCPC note that EDF Energy hold the view that "All of the possible highway routes lie outside of these landscape designations, but may be considered as part of their setting. It is anticipated that none of the routes would have significant adverse effects that would arise as a consequence." but as might be expected, hold the contrary view, especially in light of the research undertaken by an independent consultant prior to obtaining a Conservation Area designation in the Autumn of 2018.

10.3.6 KcCPC note the content of the paragraph

Please see note in respect of the importance of the PRoW network to residential and tourist amenity within the appropriate sections of this response.

10.3.7 KcCPC note the content of the paragraph

KcCPC note the topographic references made by EDF Energy but see no compelling argument or attributes that make the proposed route unique in meeting a specific or demanding requirement.

What KcCPC do see. is good quality agricultural land, with mixed wooded areas and other attractive habitats for a wide range of flora and fauna. At the same time, its positioning makes a complimentary accompaniment to the coastal areas of the AONB and the RSPB Reserve at Minsmere, offering a restful and recuperative location for migratory birds, as an example several hundred Golden Plover were seen close by earlier this year.

10.4 Route alignments considered

10.4.1 KcCPC note the content of the paragraph and Figure 10.1

a) Route alignments considered

10.4.2 KcCPC note the content of the paragraph

b) Route W North

10.4.3 KcCPC note the content of the paragraph

b) Route X KcCPC note 2 x 'b'

10.4.4 KcCPC note the content of the paragraph

c) Route Y

10.4.5 KcCPC note the content of the paragraph

10.4.6 KcCPC note the content of the paragraph

d) Route Z

10.4.7 KcCPC note the content of the paragraph

10.4.8 KcCPC note the content of the paragraph

10.5 Justification for route selection

10.5.1 KcCPC note the content of the paragraph

KcCPC is shocked at the brevity, lack of detail and the absence of an underpinning rationale in Section 10.5. It seems clear that EDF Energy have decided very late in the day, that their previous B1122 approaches were flawed and presumably as an expedient have assembled a hastily pulled together 'Plan B'.

The result is a less than compelling melange of options, none of which have been extensively researched or have anything substantial to commend them.

10.5.2 KcCPC note the content of the paragraph

In respect to the "…high-level environmental analysis…", KcCPC is unsurprised that EDF Energy thought it necessary to qualify it as "…desk-based analysis and a site visit to determine the environmental effects…" and "…The fieldwork undertaken by EDF Energy involved exploring the routes from PRoWs and the local road network…". KcCPC also note that although not identified as a key environmental factor in the narrative, Table 10.1 includes them.

KcCPC note that:

"A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the Proposed Development during the pre-application stage"

Consequently, after reading the PEI, KcCPC perceive the analysis as substantially incomplete, rudimentary and superficial in the majority, limited to providing a commentary rather than undertaking any noteworthy investigation.

Examples of which are catalogued below with KcCPC's consultation responses:

PEI 5.2.6 No mention is made of the visual receptors at Kelsale Lodge Cottages, Rosetta Cottage and Buskie Farm

PEI 5.2.10 "…mitigation to help and reduce potential landscape and visual effects would be difficult. However, the following measures would be implemented." So "Construction compounds to be located in close proximity to existing road or rail infrastructure, in areas already disturbed by traffic or trains." meaning one property (Rosetta Cottage at North Green) is surrounded on three sides by a proposed construction compound, to add to the A12 traffic less than 100 yards to the west and Town Farm Lane immediately to the South. Noting of course "Existing vegetation to be retained around the compound to reduce visibility of the compound"!

"Eleven PRoWs (all footpaths) would be diverted for the construction of the proposed link road…with a further two potentially…" See KcCPC's comments about the PRoWs for local amenity and tourism at Chapter 17 – 17.11.2

PEI 5.2.12 During construction of the proposed link road, there would be a localised change to the landscape character of the link road…linear woodland would be removed along with sections of hedgerows…there would also be localised effects on landscape character…given the localised extent…and the short-term duration of the construction period, effects are unlikely to be significant." Short-term, 24 months – unlikely to be significant, really?

PEI 5.2.15 "Effects on the landscape character of each of the fields that the proposed link road passes through would be significant and adverse…However, these significant effects would not be widespread…" not widespread along a 6.8km length of 10m wide (plus 5 metre berm) road, lit at junctions with 10m columns…in a predominantly dark area…not widespread, really?

This sort of blinkered thinking will effectively lay waste to a previously unsullied tract of agricultural land providing valuable habitats for mammals, reptiles, birds, flowers and insect life. Moreover, with 10m columns,

it will inflict unwelcome light pollution in an area where local residents and tourists currently enjoy unparalleled views of an increasingly rare 'dark' night sky.

PEI 5.2.22 KcCPC note that "…likely to be localised effects on the SLA…unlikely that there would be any significant effects…on the special qualities or the purposes of its designation".

It is unclear to KcCPC how "…desk-based analysis and a site visit to determine the environmental effects…" and "…The fieldwork undertaken by EDF Energy involved exploring the routes from PRoWs and the local road network…". can be relied upon (with any degree of certainty) to make valid judgements on such specific issues, and would welcome evidence attesting to the veracity of such claims.

PEI Table 5.2.2

Topic/Receptor	Assessment	Residual effects
Landscape character within the site and its surrounding context	Significant	Significant
Users of the footpaths and local roads that currently cross the proposed route	Significant	Significant

PEI 5.3.7 KcCPC note the hydrological link between drains and watercourses within the proposed route and Minsmere River, in turn flowing into the Minsmere and thence the Walberswick Heaths and Marshes SPA, SAC and Ramsar site and question what measures need to be taken to reduce the impact of;

- accumulated pollutants in the management of surface water
- significant diesel and/or petrol spills
- other noxious liquid, granulated or otherwise transmittable substances

PEI 5.3.8 KcCPC is concerned that despite acknowledging "A number of notable invertebrate species have been recorded in the wider area, predominantly (but not exclusively) associated with the surrounding designated sites." EDF Energy seek to minimise the potential impact of the proposed route by saying "Based on the information to date…route alignment is predominantly arable…habitats…are unlikely to be of particular importance…"

PEI 5.3.9 KcCPC is gratified that EDF Energy admit knowledge of populations of Great Crested Newts and point out that that there are significant populations identified by the Kelsale cum Carlton Bio-diversity team in virtually all of the ponds analysed to date (including East Green, Curlew Green, Dorley's Corner, Kelsale Village and Carlton).

Moreover, KcCPC have been informed (by the owner) that the pond at Fir Tree Farm has also been surveyed and found to be home to a significant colony as have areas at the Fromus Wildlife Reserve adjacent to the A12.

PEI 5.3.10 KcCPC is concerned that despite acknowledging "…field and woodland margins could provide foraging habitat…". EDF Energy seek to minimise the potential impact of the proposed route by saying "…habitats within and in close proximity to the proposed route alignment are unlikely to be of particular importance to reptiles."

KcCPC note that Kelsale cum Carlton parish is host to; grass snakes (Natrix natrix), common lizards (Zootoca vivipara), slow worms (Anguis fragilis) and adders (Vipera berus).

PEI 5.3.11 KcCPC note the species of birds attributed as being typical of open agricultural habitats, but point out that the arable land of Kelsale cum Carlton and the neighbouring communities also play host to significant populations of migratory birds as they prepare to leave, or reach landfall on their inbound journey.

In addition, the fields of the Kelsale cum Carlton area are also home/larder to; buzzard, kestrel, barn owl, tawny owl, little owl, peregrine falcon, sparrowhawk, Golden Plover, Lapwing amongst others.

PEI 5.3.12 KcCPC note the species of bats recorded in the wider area and confirm the presence of bats in rural buildings and woodland throughout the parish, although no structured analysis has been undertaken by the Kelsale cum Carlton bio-diversity group.

PEI 5.3.13 KcCPC note the content of the paragraph

PEI 5.3.14 KcCPC confirm the irregular sighting of otters in East Green and their feeding in local ponds

PEI 5.3.15 KcCPC note the content of the paragraph

PEI 5.3.16 KcCPC confirm the presence of [redacted]

PEI 5.3.17 In the absence of a detailed habitat loss mitigation plan, and the fragility of some of the species that may be impacted, KcCPC is sceptical about the practicality of EDF Energy's plans for remediation of the proposed route.

KcCPC note what a CEMP 'might do', but in the absence of any evidence, remain unconvinced in respect to EDF Energy's understanding of the scope necessary to effectively manage protection, retention and remediation along the length of the proposed route.

KcCPC note the intention of EDF Energy to deploy newt tunnels, but are concerned that research conducted over 5 years and published in 2017 found that:

"The team of scientists set out to find out how effective road tunnels are. Using 5 years of monitoring data from a major road mitigation scheme, they provided the first hard evidence that newts use tunnels to move between feeding and breeding sites. This means that road tunnels may help connect populations of newts and other small species across fragmented landscapes, by allowing animals to move between ponds and maintain genetic exchange. Small, isolated populations are otherwise very prone to extinction. But it wasn't all good news. Writing in the journal PeerJ, they showed that females made much more use of tunnels than males, potentially risking imbalances in the sexes over the long term. And, rather than tunnels connecting newts to ponds as they migrate to breed in spring, most of the action happened in autumn, meaning that tunnels might help newts find their way to their feeding and hibernating sites better than to their breeding ponds. Tunnels are usually accompanied by fences which stop newts wandering onto the road and direct them towards the tunnels. But most of the newts that contact the fences don't reach tunnel entrances, and of those that do, few attempt to cross. The researchers suggest that maximising the number of tunnels, putting ponds close to tunnel entrances, and on both sides of roads might help resolve these problems."
Source: Cambridge Conservation Forum 2018

KcCPC note EDF Energy's proposed approach to the presence of Barn Owl, but are concerned about the impact of the proposed route on Barn Owl populations, noting 'that Barn Owl deaths occur largely as a result of them crossing the carriageway, rather than as a consequence of verge hunting' (Colin Shawyer and Nick Dixon report for The Highways Agency).

The same report recommends "A comprehensive programme of nestbox provision should be undertaken on farmland at least 1.5 km either side (of the route). This should be targeted close to those linear grasslands which are identified as important dispersal corridors for Barn Owls which when intersecting the road were responsible for high levels of mortality."

KcCPC note with concern that "…construction lighting would be designed to minimise light spill into adjacent habitats. This would reduce impacts on nocturnal species such as bats for roosting or foraging", and draw EDF Energy's attention to guidance issued by the Institute of Lighting Professionals on the 12th September 2018 entitled "Guidance Note 8 Bats and artificial lighting" available at:

https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/

KcCPC note that "If confirmed to be present along the route…passage for otters and water voles would be maintained…" and suggest that as otters are unlikely to be resident, but similar to parts of Kelsale cum Carlton, may visit the route location, passage should be maintained irrespective of confirming evidence. Moreover, steps should be taken to avoid otters straying onto the carriageway.

KcCPC note that there is no consideration given by EDF Energy to safeguarding and maintaining the route of Red Deer migration from the ancient deer park at the Fromus Reserve (adjacent to the A12), crossing the A12

south of the Town Farm Lane junction (by Kelsale Lodge Cottages) across the proposed route and off to the rutting grounds on the coastal heathlands.

PEI 5.3.18 KcCPC is gravely concerned that (without any evidence) EDF Energy have determined that "Significant effects on designated sites, plants and habitats, invertebrates, reptiles, breeding birds, otters, water voles and [redacted] are not anticipated and they are not discussed further in this section of the PEI." and do not believes that is satisfactory for EDF Energy to conclude that "a detailed ecological impact assessment will be presented for these habitats and species within the ES…details of the embedded mitigation required…would similarly be provided."

KcCPC believes that the fullest consideration of the environmental impact of the proposed Sizewell Link road is essential to 'good informed decision making' and for EDF Energy to deal with these matters at Stage 3 in such a highhanded fashion is to undermine one of the principle requirements of a public consultation, insofar as there is no opportunity for public scrutiny prior to an application being made.

PEI 5.3.19 KcCPC note the content of the paragraph

PEI 5.3.20 KcCPC draw attention to comments made at 5.3.17 (above)

PEI 5.3.21 KcCPC draw attention to comments made at 5.3.17 (above)

PEI 5.3.22 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.3.23 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed ecological assessment for the ES and it being made available for public scrutiny, prior to an application being made.

PEI 5.3.24 KcCPC note that the content of this paragraph and Table 5.3.1

KcCPC is concerned at the lack of reference to a role for the RSPB, in assessing the potential impacts on ornithology and the supervision of mitigating actions.

PEI 5.3.25 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed and extended Phase 1 habitat survey and ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.3.25 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed and extended Phase 1 habitat survey and ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.4.2 KcCPC note the content of the paragraph

KcCPC note the continuing omission of Kelsale cum Carlton in consideration of the proposed EDF Energy Sizewell Link road.

PEI 5.4.7 KcCPC note the content of the paragraph

KcCPC anticipate EDF Energy undertaking limited tree and hedgerow removal under strict supervision and being subject to a pre-approved plan agreed with a suitable authority.

PEI 5.4.8 KcCPC note the content of the paragraph

As the impacts of; changed views, increased noise, dust and other emissions may impact both resident and tourist enjoyment of the amenity and in the extreme, may also be injurious to their health, KcCPC regard the provision of a public service giving specific warnings/updates on a regular basis (daily?), via; the internet, bulletins to Parish Clerks (perhaps through SALC), publication in the press and through Suffolk Coastal tourism agencies.

PEI 5.6.5 KcCPC note the content of the paragraph and Table 5.6.1

KcCPC note that the EDF Energy proposal for a Sizewell Link road removes over 120 hectares of predominantly good quality arable land from production, at a time when, many commentators regard the need for home market-based farm productivity to rise in order to meet the challenges of a post Brexit economy, as essential.

PEI 5.6.5 KcCPC note the content of the paragraph and Figure 5.6.3

KcCPC note the continuing omission of Kelsale cum Carlton in consideration of the proposed EDF Energy Sizewell Link road and draw attention to a significant portion of land under 'Organic Entry Level plus Higher Level Stewardship' referred to as 'land immediately to the south-west of the scheme boundary to the south-west of Theberton' is in fact largely in Kelsale cum Carlton parish.

PEI 5.6.17 KcCPC note the content of the paragraph

KcCPC draw EDF Energy's attention to comments made regarding an historic Red Deer migratory route crossing the EDF Energy proposed Sizewell Link road route.

Specifically, that there is no consideration given by EDF Energy to safeguarding and maintaining the route of Red Deer migration from the ancient deer park at the Fromus Reserve (adjacent to the A12), crossing the A12 south of the Town Farm Lane junction (by Kelsale Lodge Cottages) across the proposed route and off to the rutting grounds on the coastal heathlands.

In that connection, KcCPC is concerned with the proposals regarding fencing.

KcCPC consider the omission of Red Deer from EDF Energy's consideration as a significant issue, with no clear resolution identified during either the construction and/or operation phases.

PEI 5.6.28 KcCPC note the content of the paragraph

KcCPC note that EDF Energy are not bringing forward any mitigation for the loss of 120 hectares of BMV land!

PEI 5.6.30 KcCPC note the content of the paragraph

KcCPC note that "Once the proposals for the development as a whole are finalised, a full assessment of the proposals would be undertaken as part of the EIA and the results presented in the EIS. The ES would present a full assessment underpinning the conclusions drawn in relation to significant effects…."

KcCPC is concerned that the EDF Energy approach to a newly proposed road component at Stage 3, means that there is no public scrutiny of the facts pertaining to the veracity of that proposal until an application is made.

Further, KcCPC feel that with such potentially damaging ecological consequences, it is unreasonable and unsound for the proposal to go forward without further Public Consultation and calls for EDF Energy to review the integrity of the Stage 3 consultation, pause, be clear about EDF Energy's preferred way of moving forward and inject a Stage 4 consultation where EDF Energy's thinking is sound and evidenced.

PEI 5.7.2 KcCPC note the content of the paragraph

KcCPC note that "Baseline survey work has yet to be undertaken for the (EDF Energy) Sizewell Link road." and that EDF Energy believes that a robust "…preliminary consideration of noise and vibration impact can be made without reference to existing baseline values." moreover, without qualification EDF Energy assert that "It is likely that existing noise levels will be relatively low since the area is predominantly rural."

PEI 5.7.3 KcCPC note the content of the paragraph and Table 5.7.1

KcCPC do not understand why properties adjacent to the EDF Energy proposed Sizewell Link road are omitted from "Table 5.7.1 Noise vibration receptors in the vicinity of the proposed Sizewell link road" including Rosetta Cottage, Kelsale Lodge Cottages, The Farmhouse B&B, Mile Hill Barn and Gallery.

PEI 5.7.6 KcCPC note the content of the paragraph

KcCPC welcome EDF Energy's commitment to putting in place a system for receiving and recording complaints in respect to noise and vibration. KcCPC look forward to the early publication of the process and reporting arrangement. KcCPC is particularly interested in understanding the whole complaint management process and the escalation arrangements.

PEI 5.7.7 KcCPC note the content of the paragraph

KcCPC note the inferred preference for a mandatory 50mph speed limit on the EDF Energy proposed Sizewell Link road, in order to limit noise levels.

KcCPC is interested to understand the consequences of a 50mph speed limit, in respect to HGV pollution levels, changes to pollutant propagation behaviours and changes to dust propagation behaviours.

PEI 5.7.8 KcCPC note the content of the paragraph

KcCPC note noise and vibration levels have been predicted by calculation and modelling.

Were some of the buildings in the immediate vicinity of the proposed A12 roundabout built on foundations below modern norms, on a loose underpinning soil, what additional mitigations would EDF Energy make to avoid such buildings being disproportionately impacted by Sizewell C construction traffic?

PEI 5.7.10 KcCPC note the content of the paragraph and Figure 5.7.1

KcCPC note noise from the compound area is anticipated by EDF Energy to have a significantly adverse impact on Fir Tree Farm, but seemingly not effect Rosetta Cottage, Mile Hill Barn & Gallery, Kelsale Lodge Cottages and The Farmhouse B&B.

How can EDF Energy so accurately forecast the localisation of noise nuisance?

PEI 5.7.12 KcCPC note the content of the paragraph

KcCPC note noise and vibration levels at other receptors during construction are unlikely to have a significant adverse impact, but no quantification or comparisons are provided. Why are EDF Energy so reluctant to evidence their assertions?

PEI 5.7.13 KcCPC note the content of the paragraph

KcCPC note noise levels are forecast to be at their worst on the 'busiest day', but no quantification or comparisons are provided. Why are EDF Energy so reluctant to evidence their assertions?

PEI 5.7.15 KcCPC note the content of the paragraph

KcCPC refer EDF Energy to comments at 5.7.12 and 5.7.13 above

PEI 5.7.19 KcCPC note the content of the paragraph

KcCPC note EDF Energy anticipate that even with mitigations, significant noise impacts will likely last 4-6 weeks!!

PEI 5.7.22 KcCPC note the content of the paragraph

KcCPC note that a baseline noise environment has yet to be established and EDF Energy still do not have agreed construction methodologies, or layouts at Stage 3 consultation. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

PEI Table 5.7.2 KcCPC note the content of the Table

KcCPC note the incomplete list of Noise and Vibration receptors used in this table (as described in 5.7.3 above)

PEI Table 5.7.3 KcCPC note the content of the Table

KcCPC note the absence of Fir Tree Farm in this table (as described in 5.7.3 above)

PEI 5.8.1 KcCPC note the content of the paragraph

KcCPC note the absence of human receptors at properties described in 5.7.3 above

PEI 5.8.6 KcCPC note the content of the paragraph

KcCPC note the absence of properties described in 5.7.3 above and potentially being located within 10m

PEI 5.8.8 KcCPC note the content of the paragraph

KcCPC note the absence of any EDF Energy policy insisting all diesel-powered vehicles and vehicles used on the Sizewell C construction programme are equipped with exhaust abatement technologies.

KcCPC note that exhaust abatement reduces the emissions from a vehicle or a piece of equipment. A retrofitted vehicle will have emissions below the emission standard which it was originally constructed to meet, and will normally be tested to certify the fact that it meets a new, stricter emission standard. Exhaust abatement technologies are proven to reduce emissions of particulate matter and/or nitrogen oxides, so reducing pollution.

Considering the projected volume of HGV's, LGV's, Bus's and construction equipment, why are EDF Energy not demonstrating their commitment to being a 'considerate developer' and enforcing polices aimed at minimising the pollutants generated during construction and operation of Sizewell C?

PEI 5.8.9 KcCPC note the content of the paragraph

See notes at PEI 5.8.8 above

PEI 5.8.10 KcCPC note the content of the paragraph

KcCPC note that EDF Energy anticipate earthworks and track-out linked with the construction of the EDF Energy proposed Sizewell Link road as being likely to generate dust emissions as high as 'Large' under the IAQM classification and generally at or above 'Medium'.

PEI 5.8.11 KcCPC note the content of the paragraph

PEI 5.8.12 KcCPC note the content of the paragraph

KcCPC note that EDF Energy are committed to successfully implementing and monitoring all practical mitigation measures through an effective CEMP, thereby reducing impacts such that there are no "…significant dust effects…" resulting from demolition and construction activities.

PEI 5.8.13 KcCPC note the content of the paragraph

KcCPC note that HDV is a term with many interpretations and is not defined beyond Heavy Duty Vehicles, can EDF Energy be explicit about their interpretation not just in respect to PEI 5.8.13, but also how it is used throughout the Stage 3 consultation?

Can EDF Energy also confirm that controls will be in place on-site to ensure that the IAQM Screening Threshold is not breeched?

PEI 5.8.14 KcCPC note the content of the paragraph

See notes at PEI 5.8.8 above

PEI 5.8.15 KcCPC note the content of the paragraph

See notes at PEI 5.8.8 above

PEI 5.8.19 KcCPC note the content of the paragraph

See notes at PEI 5.8.8 above

PEI 5.8.22 KcCPC note the content of the paragraph

PEI Table 5.8.1 KcCPC note the content of the Table

PEI Table 5.8.2 KcCPC note the content of the Table

PEI 5.9.12 KcCPC note the content of the paragraph

KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of "…where considered necessary…". KcCPC is minded that because of the primary purpose of the EDF Energy proposed Sizewell Link road (i.e. predominantly diesel-powered HGV vehicles) there is no "…where considered necessary…". the provision should be considered 'essential' throughout the length of the road.

PEI 5.9.24 KcCPC note the content of the paragraph

KcCPC note that only "Once the proposals for the Sizewell C Project development as a whole are finalised, a full land quality assessment of the proposals…" will be undertaken. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

PEI 5.10.9 KcCPC note the content of the paragraph

KcCPC note an apparent contradiction of "There is no data available on groundwater abstractions within 1km of the site." and the observation that "…two private and one licenced groundwater abstractions located 200m west of the site's eastern extent;" made at para 5.9.3. Which is correct?

PEI 5.11.9 KcCPC note the content of the paragraph

KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of "…where considered necessary…". KcCPC is minded that because of the activity being undertaken by specific

vehicle types (i.e. predominantly diesel-powered HGV vehicles) there is no "…where considered necessary…". the provision should be considered 'essential' throughout the construction sites.

PEI 5.10.14 KcCPC note the content of the paragraph

KcCPC note an apparent contradiction that "…Construction drainage would likely be contained within the construction sites, with drainage to ground where possible." if drainage is 'to ground' is it "contained within the construction sites"?

PEI 5.9.20 KcCPC note the content of the paragraph

KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of "Where considered necessary…". KcCPC is minded that because of the primary purpose of the EDF Energy proposed Sizewell Link road (i.e. predominantly diesel-powered HGV vehicles) there is no "…where considered necessary…". the provision should be considered 'essential' throughout the length of the road.

PEI 5.11.10 KcCPC note the content of the paragraph

KcCPC note the mitigations and safeguards proposed by EDF Energy, is it correct to regard these as agreed with the Environment Agency?

The importance of carefully "…phased construction to minimise impacts on the river." alludes KcCPC. Could EDF Energy explain what is meant by this point?

PEI 5.11.21 KcCPC note the content of the paragraph

KcCPC note that only "Once the proposals for the Sizewell C Project development as a whole are finalised, a full assessment of potential effects on the surface water environment…" will be undertaken. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

PEI Table 5.11.1 KcCPC note the content of the Table and its vagueness in the absence of suitable assessment – see comments at PEI 5.11.21 above

PEI Table 5.11.2 KcCPC note the content of the Table and its vagueness in the absence of suitable assessment – see comments at PEI 5.11.21 above

PEI 5.13.7 KcCPC note the content of the paragraph

KcCPC note the number and severity of traffic collisions

PEI 5.13.8 KcCPC note the content of the paragraph

KcCPC note the number and severity of traffic collisions

PEI 5.13.10 KcCPC note the content of the paragraph

KcCPC note that whilst junctions with minor roads are an integral part of the proposal "…that would mitigate against potential loss of amenity and increased mileage which would otherwise be experienced by users…" they also pose a risk of increasing the use by unscrupulous motorists as 'rat runs'.

As a result, KcCPC would like to see EDF Energy polling residents and agricultural users of these minor roads to see whether options other an 'open access' (i.e. restricted width, unidirectional access, etc.) might be more agreeable in the context of the potential threats.

PEI 5.13.12 KcCPC note the content of the paragraph

KcCPC note that the proposed contractor's compound is sited toward the northern and western boundary of Kelsale cum Carlton parish.

PEI 5.13.13 KcCPC note the content of the paragraph

KcCPC note the inference that construction traffic could use smaller roads.

As a consequence, KcCPC seek categoric assurance from EDF Energy that use of the minor road network surrounding the A12 in Kelsale cum Carlton parish, by EDF Energy construction traffic (i.e. LGV, HGV and buses) would be proscribed and rigorously controlled.

To do otherwise would compromise the amenity the network provides to; residents, tourists, walkers, horse riders, cyclists and lead to potentially dangerous situations arising when agricultural traffic meets other large vehicles on single track lanes with no (or few) passing places.

PEI 5.13.14 KcCPC note the content of the paragraph

KcCPC note the potential disruption to rail passengers occasioned by the installation of the road overbridge.

KcCPC also note the inference that 'bridge component' traffic could use smaller roads.

As a consequence, KcCPC seek categoric assurance from EDF Energy that use of the minor road network surrounding the A12 in Kelsale cum Carlton parish, by EDF Energy 'bridge component' traffic (i.e. LGV, HGV and buses) would be proscribed and rigorously controlled.

To do otherwise would compromise the amenity the network provides to; residents, tourists, walkers, horse riders, cyclists and lead to potentially dangerous situations arising when agricultural traffic meets other large vehicles on single track lanes with no (or few) passing places.

PEI 5.13.21 KcCPC note the content of the paragraph

KcCPC note that construction of the EDF Energy proposed Sizewell Link road is to happen in the 'early years' at the same time as the; accommodation campus, both Park & Rides, the FMF, 2 villages bypass, etc..

KcCPC is concerned at this apparent simultaneous enactment of activity along the length of the A12 and wish to understand how EDF Energy propose to deal with the complications this strategy implies.

For example; - the handling of Traffic Incidents, without Wickham Market Park and Ride being in place?
- the management and control of traffic movements without the FMF in place

PEI 5.13.22 KcCPC note the content of the paragraph

KcCPC note that construction of the EDF Energy proposed Sizewell Link road is projected to be built during the 'early years', take 24 months, but be available for use prior to the peak in 2027.

PEI 5.13.31 KcCPC note the content of the paragraph

KcCPC note the intent of the west of Middleton Moor B1122/Sizewell link and question whether:

- sufficient consideration has been given to traffic flow integration at the Sizewell Link end
- sufficient consideration has been given to 'flow crossing' to access this link on the return journey

And whether similar issues may pertain to the proposed B1125 Junction further east.

PEI 5.13.32 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention to compel Sizewell C construction HGV traffic and Buses to proceed south through Yoxford to join the EDF Energy Sizewell Link road at the crest of Mile Hill near Town Farm Lane.

KcCPC also note that EDF Energy have no intention to compel workforce traffic and Light Goods Vehicles to use the EDF Energy Sizewell Link road at the crest of Mile Hill near Town Farm Lane.
Further, KcCPC note EDF Energy make no comment in respect to where returning traffic will be routed and likewise in respect to traffic using the B1125 for inbound journeys?

However, KcCPC assume some rationale must have been applied by EDF Energy in arriving at their forecast volumes of 'Vehicles'?

The lack of clarity and a substantiated rationale casts some considerable doubt on the integrity of the forecasts made by EDF Energy and whether they are achievable!

PEI 5.13.36 KcCPC note the content of the paragraph

KcCPC note that "Once the design for the Sizewell Link road is developed further and in more detail, a traffic and transport assessment will be undertaken and will be used to inform the ongoing EIA and the ES." As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

10.5.3 KcCPC note the content of the paragraph and Table 10.1

In respect to Table 10.1, KcCPC is unconvinced as to how it adds any clarity to the decision making or route selection justification.

Presumably EDF Energy have applied 'weightings' to particular elements within the table, and are not prepared to share the underpinning rationale leading to the proposal they have brought forward at Stage 3 of the consultation. Irrespective, as presented Table 10.1 does not constitute a 'decision making matrix' of any typical form.

10.5.4 KcCPC note the content of the paragraph

In respect to the content, KcCPC note that it is largely a commentary rather than a justification for or against the route(s) – KcCPC noting that seemingly EDF have considered two routings (W North and W South), but do not distinguish between either in the narrative.

KcCPC also note that EDF Energy make the assertion that "…it is likely the necessary engineering works to traverse the landform would have a significant adverse effect on the existing landscape character…"

KcCPC is of the opinion that any route's existing landscape is likely to be significantly adversely impacted by a two-lane carriageway.

10.5.5 KcCPC note the content of the paragraph

In respect to the content, KcCPC note EDF Energy have omitted any reference to; passing within 50m of a designated Conservation Area, the density of housing immediately adjacent to the route (including a recently approved development of 43 dwellings), a recreation ground with children's playground immediately adjacent, a primary school less than 100m from the route, an adjacent light industrial estate and a non-designated parkland setting identified in the Draft SCDC Local Plan.

10.5.6 KcCPC note the content of the paragraph

In respect to the content, KcCPC point out that Route Y is not "…positioned north of Saxmundham and Kelsale…", it lies in the Parish of Kelsale cum Carlton and impacts directly on the communities at Curlew Green and Dorley's Corner.

Moreover, the route bisects Tiggins Lane in close proximity to the northern border of the designated Conservation Area of Kelsale Village and near a valuable ecological Roadside Nature Reserve.

10.5.7 KcCPC note the content of the paragraph

In respect to the content, KcCPC refer EDF Energy to their PEI responses (above at 10.5.2 onwards)

10.6 Consideration of route "D2"

10.6.1 KcCPC note the content of the paragraph

10.6.2 KcCPC note the content of the paragraph

10.6.3 KcCPC note the content of the paragraph

10.6.4 KcCPC note the content of the paragraph

Without wishing to labour the point, it is the view of KcCPC that; any Sizewell C construction programme based largely on delivery of materials on the A12 must be considered unsound.

In that connection, KcCPC wish to make two fundamental observations regarding the construction of Sizewell C and the impacts that will be felt directly and indirectly on the Suffolk Coastal area, all the way from Felixstowe in the south to Lowestoft in the north.

Firstly, unpalatable as it may be, EDF Energy must recognise that the cumulative impact of multiple energy related projects, a significant housebuilding programme, a need to develop 'year-round' tourism and poor infrastructure mean that the A12 is totally unprepared and unsuitable for the combined traffic 'onslaught' it will endure over the next 10-15 years.

KcCPC assume that as a mature, internationally significant corporate, EDF Energy must have recognised that the A12 constitutes an unacceptably high risk, single point of vulnerability [SPV], that has no viable alternative and as such, must be remedied in order to secure the much needed investment for the project.

Secondly, assuming that EDF Energy can; find a position that it is comfortable with in respect to the risk posed by the A12 SPV, manages to attract the necessary investment, obtains a development order and is able to commence work, the reality is that on a daily basis, it will walk an operational tightrope, hoping a 25-30 mile journey made by at least 225 HGV vehicles, on an ill-disposed road does not meet with any disruption.

Effectively, without tackling the fundamental A12 issue, EDF Energy are backing a daily 12,000+ mile 'punt' on the durability and resilience of the A12, with no levers under their control!

KcCPC believes that this situation is untenable and fear the impacts on; residents, businesses, the environment, visitors and wildlife will be so widespread, it will lead to long term damage that will take a decade to recover from.

In order to illustrate the potential vulnerability of an A12 facilitated programme requiring 10,700,000 of construction materials, the following pages (along with everyday events identified at 10.2.2 above) aim to substantiate KcCPC's assertion.

10.7 The proposed Sizewell link road

a) Route description

10.7.1 KcCPC note the content of the paragraph and Figure 10.2

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.2 KcCPC note the content of the paragraph and Figure 10.2

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.3 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.4 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

KcCPC wish EDF Energy to note that the western end of the proposed Sizewell Link road lies in Kelsale cum Carlton (not the esoterically referenced "...south of Yoxford…").

10.7.5 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.6 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

b) Earthworks

10.7.7 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

c) Surface water

10.7.8 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.9 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.10 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

d) Vehicle restraint systems

10.7.11 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

e) Rights of way

10.7.12 KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

f) Lighting

10.7.13 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.14 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.15 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.7.16 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8 Construction of Sizewell link road

10.8.1 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8.2 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8.3 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8.4 KcCPC note the content of the paragraph and Figure 10.3

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8.5 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.8.6 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.9 Operation of the Sizewell link road

10.9.1 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

10.9.2 KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

11 **Theberton Bypass** (Volume 1, Pages 324 to 331)

11.1 Introduction

11.1.1 KcCPC note the content of the paragraph

11.1.2 KcCPC note the content of the paragraph

KcCPC note that "…councils at Yoxford, Theberton and Middleton-cum-Fordley, together with the Theberton and Eastbridge Action Group on Sizewell, were strongly opposed at Stage 2 to using the B1122 as…" and also note, EDF Energy do not develop the views expressed by these Councils or the alternatives strategies that were brought forward by them.

KcCPC also note that EDF Energy recognise "that the environmental impacts from, in particular, noise, vibration and severance from the Sizewell C traffic would require mitigation under the both the rail-led or the road-led strategy." and that "…the B1122 is not close to its traffic carrying capacity.".

11.1.3 KcCPC note the content of the paragraph

KcCPC is clear that it is for the Theberton Parish Council, the residents and businesses of the Parish to determine where the proposals being brought forward by EDF Energy are suitable and advantageous mitigations for the potential damage to the built environment, health and well-being of the village. It is anticipated that Theberton may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed bypass and ancillary works.

KcCPC as a bordering Parish note, the loss of visual and recreational amenity arising from the proposed bypass, and the potential effect of 'ringing' Theberton with roads, along with the miseries that may bring.

11.1.4 KcCPC note the content of the paragraph

KcCPC believes it is disingenuous for EDF Energy to talk about the proposed bypass removing all Sizewell C construction and "existing through traffic" from Theberton, when previously in the Stage 3 consultation documents, EDF Energy have themselves indicated high levels of re-routing by existing traffic to avoid the Sizewell Construction traffic flow.

KcCPC once again note EDF Energy's reference to "…the construction workers arriving by car…" and point out that EDF Energy's currently woeful car sharing ambitions could make a substantial difference to this unnecessarily high number, if lifted to a minimum of 3 people sharing a car in order to gain access to Main Site parking.

11.1.5 KcCPC note the content of the paragraph

KcCPC note the assertion that the bypass "…would substantially reduce traffic volumes passing through Theberton, resulting in the reduction in noise…" and wonder what evidence there is that substantiates this, particularly in respect to 'ambient noise', an injurious feature for many communities alongside motorways, trunk roads and bypasses.

KcCPC also note that EDF Energy make no reference to airborne pollution, specifically dust, which may increase disproportionately from the high HGV/Bus volumes traversing the bypass at a higher average speed (50mph design speed) than the current route.

11.1.6 KcCPC note the content of the paragraph

KcCPC note the assertion that "The bypass would also continue to relieve Theberton of through traffic after Sizewell C construction completion and thereby provide a major legacy benefit for the village." but point out that one unforeseen consequence of bypasses in other parts of the country (particularly in holiday destinations), is a marked decline in business fortunes attributable to the loss of 'passing trade' revenues.

11.1.7 KcCPC note the content of the paragraph

11.2 Scheme requirements

11.2.1 KcCPC note the content of the paragraph

11.2.2 KcCPC note the content of the paragraph

KcCPC note that EDF Energy's obsession with 'capacity' is again exposed when referencing the 'sufficiency' of the proposed Theberton bypass.

However, queueing theory, observational and researched behavioural considerations barely get mentioned throughout the Stage 3 documentation.

What is mentioned though, is the consequence of not considering other matters. Most notably, the EDG Energy assertion that the B1122 may be used in the event of the Theberton Bypass or (if applicable) EDF Energy's Sizewell Link not being passable.

11.2.3 KcCPC note the content of the paragraph

KcCPC note that "all park and ride buses and HGVs to use the Theberton bypass…" and seek confirmation this means any vehicle categorised as an HGV in UK regulations and any vehicle configured as a bus (irrespective of size) and used to transport members of the Sizewell workforce, visitors and contractors to and from either of EDF Energy's Park and Ride sites (or other EDF Energy remote locations).

Moreover, KcCPC would like to see evidence (within any application for a development order) that, management control processes and suitable technologies are to be deployed to monitor, police and enforce compliance by vehicle drivers.

11.2.4 KcCPC note the content of the paragraph

KcCPC note the omission of compulsion to use the Theberton bypass, when applied to construction workers.

KcCPC note EDF Energy's reference to "…EDF Energy would expect construction workers to use the route…" and point out that EDF Energy's currently woeful car sharing ambitions could make a substantial difference if lifted to a minimum of 3 people sharing a car and traversing the Theberton bypass, in order to gain access to Main Site parking.

11.3 Environmental considerations

11.3.1 KcCPC note the content of the paragraph

11.3.2 KcCPC note the content of the paragraph

KcCPC note that the environmental considerations have not been progressed to sufficient enough a degree that EDF Energy can confirm the viability of proposed route.

KcCPC note the intention of EDF Energy (were it necessary) to utilise the Theberton bypass as an HGV holding area, when access to the construction site is not possible, diverting other traffic through Theberton on the B1122.

In light of this KcCPC believes it essential that a full environment impact analysis should be available prior to an application for a development order, describing the impact in Theberton (and the surrounding area), of

- a standing HGV column on the Theberton bypass combined with…
- …a re-routed traffic mixed traffic flow moving (in both directions) through Theberton on the B1122

11.3.3 KcCPC note the content of the paragraph

11.3.4 KcCPC note the content of the paragraph

11.3.5 KcCPC note the content of the paragraph

Whilst KcCPC note EDF Energy's intent to protect "The Suffolk Coast & Heath AONB and SLA were considered as part of the desk-based analysis of the Theberton Bypass route." and that "All of the possible highway routes lie outside of these landscape designations…", it is concerned (in advance of the EIA), lest EDF Energy give or are given the impression that all other land is of lesser standing and thereby expendable!

KcCPC wish to remind EDF Energy that the Suffolk Coastal area is a valued and important tourism asset, not just because of the attributed assets (i.e. AONB, SSSI, etc.), but also because of the overall settings in which they exist and the 'rural' nature of the towns, villages and communities.

Consequently, it is not only the construction of Sizewell C that matters to KcCPC, but also the subsequent impacts and how quickly the locality can recover.

KcCPC respectfully remind EDF Energy that they too attach some value to the 'rural' nature of the area, as evidenced in their avowed intent to narrow the Sizewell C main access road, post construction and give it the feel of a 'country road'.

11.3.6 KcCPC note the content of the paragraph

KcCPC note the proposed disruption to many PRoW (another tourism asset) resulting from the EDF Energy proposal. Including; noise levels, changes to or/loss of views, habitat changes, etc. – potentially accompanied by increased pollution and reduced air quality, dependent on the diversionary PRoW proposals.

Equally, KcCPC note the absence of any significant proposals for alternative arrangement and/or routing of impacted PRoWs within the Stage 3 consultation documents.

11.3.7 KcCPC note the content of the paragraph

KcCPC note EDF Energy's appreciation of the land comprising the proposed route and that it is "…formed from a series of rolling valley sides." with the land being predominantly in use as "arable farmland, with well-defined hedgerow field boundaries, interspersed with scattered woodlands and copses."

11.4 Justification for route selected

11.4.1 KcCPC note the content of the paragraph and Figure 11.1

11.4.2 KcCPC note the content of the paragraph

11.4.3 KcCPC note the content of the paragraph

KcCPC note that the proposed "…route was subject to **desk-based analysis** and **a site visit** to determine the environmental effects." and are unconvinced of the soundness of the proposal based on the complexity of the site and extent of the proposed area being considered.

11.4.4 KcCPC note the content of the paragraph

KcCPC note that "There is potential for the significance of some heritage assets to be adversely affected by the scheme due to changes in their setting resulting from the scheme but this is likely to be limited.", but note the lack of tangible objective evidence to support this assertion.

Moreover, KcCPC note the observation that "at Anneson's Cottages and Valley Farm there is a potential to cause **significant effects** on the amenity of residents. Effects on the existing road network are also likely to be minimal, although a number of PRoWs would be bisected and adequate provisions would need to be

provided." despite the prior sentence maintaining "Elsewhere the route is generally positioned away from existing properties with minimal effect…"!

11.5 Proposed development

a) Route description

11.5.1 KcCPC note the content of the paragraph

KcCPC particularly note the proposal for the route to have a 50mph design speed (see 11.1.5 above)

11.5.2 KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note the incomplete nature of the proposals being put forward at Stage 3 consultation and the lack of preparedness of EDF Energy's plan with regard to landowner consultations vis-à-vis access to retained land.

KcCPC note the proposal promotes the use of a 'ghost island' junction at the B1125 and wonder whether this provides the most suitable type of junction, particularly as the traffic volume after the B1125 would indicate that 'flow crossing' may be considerable from the B1122 to the B1125.

11.5.3 KcCPC note the content of the paragraph

11.5.4 KcCPC note the content of the paragraph

11.5.5 KcCPC note the content of the paragraph

11.5.6 KcCPC note the content of the paragraph

KcCPC note that the environmental considerations have not been progressed to sufficient enough a degree that EDF Energy can confirm the viability of proposed route.

b) Earthworks

11.5.7 KcCPC note the content of the paragraph

KcCPC note the EDF Energy outline route plan for construction traffic at 11.6.5 (below)

KcCPC note EDF Energy do not describe how and where 25,900 cubic metres of material will be disposed of, nor any (if at all) additional HGV movements arising as a consequence.

c) Surface water

11.5.8 KcCPC note the content of the paragraph

KcCPC note EDF Energy has yet to consult the Local Flood Authority (SCC) and/or Environment Agency in respect to surface water.

11.5.9 KcCPC note the content of the paragraph

KcCPC note EDF Energy does not mention integral measures for ensuring surface water arrangements are free from contaminants (i.e. petrol, diesel, agricultural chemicals, noxious materials, etc.).

KcCPC note EDF Energy has not yet completed geotechnical testing along the proposed route.

11.5.10 KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note that drainage retention and filtration areas indicative pending geotechnical testing.

d) Vehicle restraint systems

11.5.11 KcCPC note the content of the paragraph

KcCPC note that the EDF Energy proposal is not advanced to a degree that EDF Energy feel able to determine any vehicle restraint arrangements at present.

e) Rights of Way

11.5.12 KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note that the EDF Energy proposal is not advanced to a degree that EDF Energy feel able to assess or determine an appropriate solution for any PRoW impacted by the proposed route.

KcCPC note that EDF Energy intend to seek the assistance of SCC and SCDC (or its successor – East Suffolk) in finding suitable arrangements (i.e. stile, gate, diversion, etc.), prior to any submission of an application for development consent.

f) Lighting

11.5.13 KcCPC note the content of the paragraph

11.5.14 KcCPC note the content of the paragraph

KcCPC note the EDF Energy proposals to light three junctions on the route of the proposed Theberton bypass and regard the views of the appropriate highway authority, in consultation with Theberton Parish Council, residents and businesses to determine the efficacy of EDF Energy's proposal.

11.5.15 KcCPC note the intent of EDF Energy to adopt a highway lighting design standard, which implies lighting columns of (typically) 10m in height, and questions whether this is in keeping with the immediate surroundings and/or necessary?

11.5.16 KcCPC note the content of the paragraph

g) Improvement west of the junction with Mill Street

11.5.17 KcCPC note the content of the paragraph

11.5.18 KcCPC note the content of the paragraph

11.6 Construction of Theberton bypass

11.6.1 KcCPC note the content of the paragraph

11.6.2 KcCPC note the content of the paragraph

KcCPC note the EDF Energy outline timeline that indicates "Theberton bypass would be built during the early years…" and "…would take about 12 months to build." but would only "…be completed and opened to use before Sizewell C construction traffic reaches a peak in 2027."

11.6.3 KcCPC note the content of the paragraph

11.6.4 KcCPC note the content of the paragraph and Figure 11.2

11.6.5 KcCPC note the content of the paragraph

11.6.6 KcCPC note the content of the paragraph

11.7 Operation of the Theberton bypass

11.7.1 KcCPC note the content of the paragraph

KcCPC note the assertion at 11.7.1 that:

"On a typical day at peak construction in 2027, the forecast traffic flows on Theberton bypass **are 8,850 vehicles** per day to the east of the B1125 junction…"

This contradicts an assertion made at 10.9.2 that:

"On a typical day at peak construction in 2027, the predicted traffic flows on Sizewell link road **are 9,650 vehicles** per day to the east of the B1125 junction…"

KcCPC assume that EDF Energy attribute this variance as being the HGV difference between a Road-led Peak at 10.9.2 and the Rail-Led Peak at 11.7.1.

However, a variance of 800 vehicles/movements equates to 400 HGV deliveries, when the forecast difference between Peak loadings, as described in Table 6.1 is either:

	Road-Led	Rail-Led	Variance
Typical	750	450	300 movements 150 deliveries
Busiest day	1,500	900	600 movements 300 deliveries

So, if this is not the reason for the variation, it is KcCPC's belief that the opaqueness of the underpinning Traffic Analysis provided by EDF Energy in the Stage 3 consultation, is designed to fog the unsound nature and sustainability of EDF Energy's forecast construction traffic volumes along the A12 route and the EDF Energy proposed Sizewell Link road.

12 Two Village Bypass (Volume 1, Pages 332 to 340)

12.1 Introduction

12.1.1 KcCPC note the content of the paragraph

12.1.2 KcCPC note the content of the paragraph

12.1.3 KcCPC note the content of the paragraph

KcCPC is clear that it is for the Farnham and Stratford St Andrew Parish Councils, the residents and businesses of the Parishes to determine where the proposals being brought forward by EDF Energy are suitable and advantageous mitigations for the potential damage to the built environment, health and well-being of the village. It is anticipated that Farnham and Stratford St Andrew may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed bypass and ancillary works.

12.1.4 KcCPC note the content of the paragraph

12.2 Scheme requirements

12.2.1 KcCPC note the content of the paragraph

12.2.2 KcCPC note the content of the paragraph

12.2.3 KcCPC note the content of the paragraph

12.2.4 KcCPC note the content of the paragraph

12.2.5 KcCPC note the content of the paragraph

12.3 Overview of feedback and response to consultation

a) Introduction

12.3.1 KcCPC note the content of the paragraph

12.3.2 KcCPC note the content of the paragraph

b) Overview of feedback from the Stage 2 consultation and response to consultation

12.3.3 KcCPC note the content of the paragraph

KcCPC note particularly "…others opposed improvements because of their impact on the environment and the rural feel of the local area. Some respondents opposed all the proposed options because they were concerned that none of the options adequately address traffic congestion or would result in traffic problems being moved to another location rather than mitigated."

12.3.4 KcCPC note the content of the paragraph

12.3.5 KcCPC note the content of the paragraph

KcCPC note particularly "…respondents expressed the view that Option 4 was the preferable option, although they would prefer a more extensive, four village bypass."

12.3.6 KcCPC note the content of the paragraph

12.3.7 KcCPC note the content of the paragraph

KcCPC note particularly "A significant number of respondents expressed support for a four village bypass as an alternative option."

12.3.8 KcCPC note the content of the paragraph and Table 12.1

12.3.9 KcCPC note the content of the paragraph

KcCPC note particularly:

"…something does need to be done to address the existing position in Farnham…the congestion caused by conflicting traffic at the bend is unacceptable in itself and creates a delivery risk for the Sizewell C project"

"…to recognise the significant impact of the Sizewell C traffic during the construction phase – particularly the increase in problematic HGV movements – EDF Energy accepts that it is appropriate to propose a scheme of mitigation"

"…for the reasons explained in our Stage 2 consultation and also in section 12.6 of this chapter, we consider that it would not be proportionate or necessary for EDF Energy to develop a four-village bypass."

12.3.10 KcCPC note the content of the paragraph

c) Transport

12.3.11 KcCPC note the content of the paragraph

KcCPC note particularly "…the Stage 2 feedback about the A12 proposals related to the existing and expected traffic levels and the knock-on effects of traffic including noise and air pollution, safety concerns and effects on the environment."

12.3.12 KcCPC note the content of the paragraph

12.3.13 KcCPC note the content of the paragraph

KcCPC note particularly "…Some respondents suggested that, in relation to the two-village bypass, improved traffic flow through or around Farnham and Stratford St Andrew would create congestion at Yoxford." and are familiar with the potential Yoxford impact described, as being one of the unforeseen consequences described in 'queueing theory' research.

However, EDF Energy's view is "…there is no evidence to suggest that additional traffic would pass through Yoxford as a result of the two village bypass…".

12.3.14 KcCPC note the content of the paragraph

KcCPC note particularly "Some respondents expressed concerns about the estimates or assumptions used in the modelling for the proposals."

12.3.15 KcCPC note the content of the paragraph

KcCPC note particularly "A single village option was developed and tested at Stage 2 but it would have significant impacts" but EDF Energy omit to include details of the "…significant impacts…" that arose!

d) Environmental and socio-economic considerations

12.3.16 KcCPC note the content of the paragraph

12.3.17 KcCPC note the content of the paragraph

12.3.18 KcCPC note the content of the paragraph

12.3.19 KcCPC note the content of the paragraph

12.3.20 KcCPC note the content of the paragraph

12.3.21 KcCPC note the content of the paragraph

KcCPC note EDF Energy "continue to discuss the proposals with landowners and local residents to develop a scheme that strikes the right balance between the primary route function of the A12 and local connectivity."

12.3.22 KcCPC note the content of the paragraph

KcCPC note EDF Energy's response to local concerns on the environmental impacts was "In our view, the environmental effects of a two-village bypass can be limited and mitigated to an acceptable level through good design."

12.3.23 KcCPC note the content of the paragraph

12.4 Scheme description

12.4.1 KcCPC note the content of the paragraph

12.4.2 KcCPC note the content of the paragraph

KcCPC note the intention to run the route "through the floodplain to the south of the existing A12."

12.4.3 KcCPC note the content of the paragraph and Figure 12.1

12.5 Proposed development

12.5.1 KcCPC note the content of the paragraph

12.5.2 KcCPC note the content of the paragraph

KcCPC note the intention to "…consult with all affected landowners to inform the ongoing design process for the two-village bypass."

12.5.3 KcCPC note the content of the paragraph

KcCPC note that the "…eastern roundabout has been relocated from the A12/A1094 Friday Street junction so that it can largely be built off-line to minimise traffic management requirements and potential disruption to A12 and A1094 traffic flows during construction"

a) General arrangement overview

12.5.4 KcCPC note the content of the paragraph and Figure 12.1

12.5.5 KcCPC note the content of the paragraph

12.5.6 KcCPC note the content of the paragraph

12.5.7 KcCPC note the content of the paragraph and Figure 12.1

b) Access

12.5.8 KcCPC note the content of the paragraph and Figure 12.2

12.5.9 KcCPC note the content of the paragraph

12.5.10 KcCPC note the content of the paragraph

c) Buildings, structures and lighting

12.5.11 KcCPC note the content of the paragraph

12.5.12 KcCPC note the content of the paragraph

12.5.13 KcCPC note the content of the paragraph

KcCPC note with much regret that EDF Energy propose to light both roundabouts, seemingly reinforcing the oft spoken view that EDF Energy's legacy to Coastal Suffolk will be **light pollution**, as is evident at Hinkley Point C where the construction 'glow dome' is visible 4 miles away as the crow flies, 8 miles by road.

12.5.14 KcCPC note the content of the paragraph

KcCPC note with regard to the proposed lighting that EDF Energy propose using 10m lighting columns

12.5.15 KcCPC note the content of the paragraph

d) Landscaping and drainage

12.5.16 KcCPC note the content of the paragraph and Figure 12.1

e) Construction

12.5.17 KcCPC note EDF Energy have "no intention to drain the bypass to any local drainage outside of the River Alde." but do not advise the safeguarding measures that are being taken to avoid fuel spillages, noxious liquids, etc. entering the water course and the River Alde.

12.5.18 KcCPC note the content of the paragraph and Figure 12.1

12.5.19 KcCPC note the content of the paragraph

KcCPC note the fill deficit, and have also noted the surplus fill resulting from the Theberton bypass. Does EDF Energy have any proposals in this regard?

f) Operation and post operation

12.5.20 KcCPC note the content of the paragraph

KcCPC note EDF Energy "anticipate that the two village bypass would be operational from 2024…", three years prior to the Theberton bypass!

12.5.21 KcCPC note the content of the paragraph

12.6 Four village bypass

12.6.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's assertion that "Many respondents called for the construction of the four-village bypass to the exclusion of other options." but once again fail to quantify or evidence the assertion.

12.6.2 KcCPC note the content of the paragraph

12.6.3 KcCPC note the content of the paragraph

12.6.4 KcCPC note that EDF Energy "…supports the principle of the four-village bypass scheme where we can be satisfied that it would be delivered in an appropriate timeframe for the Sizewell C development. Therefore, EDF Energy is currently continuing to work with SCC to see if such a scheme can be supported."

13 Northern Park and Ride (Volume 1, Pages 341 to 349)

13.1 Introduction

13.1.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's claim that "Opportunities have been sought to limit and mitigate the traffic and traffic-related effects of moving goods and people…" yet KcCPC once again note EDF Energy's woeful car sharing ambitions that could make a substantial difference to the unnecessarily high number of car movements. If EDF Energy were to lift the ambition to a minimum of 3 people sharing a car, in order to gain access to Main Site parking numbers would undoubtedly tumble.

13.1.2 KcCPC note the content of the paragraph

13.1.3 KcCPC note the content of the paragraph

13.1.4 KcCPC note the content of the paragraph

13.1.5 KcCPC note the content of the paragraph

13.1.6 KcCPC note the content of the paragraph

13.2 Scheme requirements

13.2.1 KcCPC note the content of the paragraph

13.2.2 KcCPC note the content of the paragraph and Figure 13.2

13.2.3 KcCPC note the content of the paragraph

13.2.4 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention for the site to be available 20 hours per day (05:00 to 01:00), every day

13.2.5 KcCPC note the content of the paragraph

13.2.6 KcCPC note the content of the paragraph

13.3 Site description

13.3.1 KcCPC note the content of the paragraph

13.3.2 KcCPC note the content of the paragraph and Figure 13.2

13.3.3 KcCPC note the content of the paragraph

13.3.4 KcCPC note the content of the paragraph

13.3.5 KcCPC note the content of the paragraph

13.3.6 KcCPC note the content of the paragraph

13.4 Site description

a) Introduction

13.4.1 KcCPC note the content of the paragraph

13.4.2 KcCPC note the content of the paragraph and Figure 13.2

13.4.3 KcCPC note the content of the paragraph

b) Overview of feedback from the Stage 2 consultation and response to consultation

13.4.4 KcCPC note the content of the paragraph

13.4.5 KcCPC note the content of the paragraph

13.4.6 KcCPC note the content of the paragraph

13.4.7 KcCPC note the content of the paragraph

13.4.8 KcCPC note the content of the paragraph and Table 13.1

13.4.9 KcCPC note the content of the paragraph

c) Transport

13.4.10 KcCPC note the content of the paragraph

13.4.11 KcCPC note the content of the paragraph

13.4.12 KcCPC note the content of the paragraph

13.4.13 KcCPC note the content of the paragraph and Figure 13.2

13.4.14 KcCPC note the content of the paragraph

13.4.15 KcCPC note the content of the paragraph

d) Environmental considerations

13.4.16 KcCPC note the content of the paragraph

13.4.17 KcCPC note the content of the paragraph

13.4.18 KcCPC note the content of the paragraph

13.4.19 KcCPC note the content of the paragraph

e) Socio-economic

13.4.20 KcCPC note the content of the paragraph

13.4.21 KcCPC note the content of the paragraph

13.4.22 KcCPC note the content of the paragraph

13.4.23 KcCPC note the content of the paragraph

13.4.24 KcCPC note the content of the paragraph

f) Construction and operational requirements

13.4.25 KcCPC note the content of the paragraph

13.5 Proposed development

13.5.1 KcCPC note the content of the paragraph

13.5.2 KcCPC note the content of the paragraph

13.5.3 KcCPC note the content of the paragraph

a) General arrangement overview

13.5.4 KcCPC note the content of the paragraph

13.5.5 KcCPC note the content of the paragraph and Figure 13.2

13.5.6 KcCPC note the content of the paragraph

13.5.7 KcCPC note the content of the paragraph

b) Access

13.5.8 KcCPC note the content of the paragraph and Figure 13.2

13.5.9 KcCPC note the content of the paragraph

13.5.10 KcCPC note the content of the paragraph

13.5.11 KcCPC note the content of the paragraph

c) Buildings, structures and lighting

13.5.12 KcCPC note the content of the paragraph

13.5.13 KcCPC note the content of the paragraph

KcCPC is concerned that lighting on site be kept to a minimum, but enough for adequate security and personal safety. And that in doing so, downlighting from low level columns or stub posts predominate to minimise any light spill.

13.5.14 KcCPC note the content of the paragraph

d) Landscaping and drainage

13.5.15 KcCPC note the content of the paragraph and Figure 13.2

KcCPC note absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class).

13.5.16 KcCPC note the content of the paragraph

13.5.17 KcCPC note the content of the paragraph

KcCPC welcome the early publication of EDF Energy's 'Park and Ride Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

e) Construction

13.5.18 KcCPC note the content of the paragraph

KcCPC note EDF Energy expect "that construction work for this facility would take place over a period of approximately 12 months." yet give no 'in service' date.

13.5.19 KcCPC note the content of the paragraph

13.5.20 KcCPC note the content of the paragraph

f) Operation

13.5.21 KcCPC note the content of the paragraph

13.5.22 KcCPC note the content of the paragraph

13.5.23 KcCPC note the content of the paragraph

13.5.24 KcCPC note the content of the paragraph

13.5.25 KcCPC note the content of the paragraph

13.5.26 KcCPC note the content of the paragraph

13.5.27 KcCPC note the content of the paragraph

13.5.28 KcCPC note the content of the paragraph

g) Removal and reinstatement

13.5.29 KcCPC note the content of the paragraph

14 Southern Park and Ride (Volume 1, Pages 350 to 362)

14.1 Introduction

14.1.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's claim that "Opportunities have been sought to limit and mitigate the traffic and traffic-related effects of moving goods and people…" yet KcCPC once again note EDF Energy's woeful car sharing ambitions that could make a substantial difference to the unnecessarily high number of car movements. If EDF Energy were to lift the ambition to a minimum of 3 people sharing a car, in order to gain access to Main Site parking numbers would undoubtedly tumble.

14.1.2 KcCPC note the content of the paragraph

14.1.3 KcCPC note the content of the paragraph

14.1.4 KcCPC note the content of the paragraph

14.1.5 KcCPC note the content of the paragraph

14.1.6 KcCPC note the content of the paragraph

14.1.7 KcCPC note the content of the paragraph

14.2 Scheme requirements

14.2.1 KcCPC note the content of the paragraph

14.2.2 KcCPC note the content of the paragraph

14.2.3 KcCPC note the content of the paragraph

14.2.4 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention for the site operation between 05:00 and 01:00, seven days per week

14.2.5 KcCPC note the content of the paragraph

14.2.6 KcCPC note the content of the paragraph

14.3 Site description

14.3.1 KcCPC note the content of the paragraph and Figure 14.2

14.3.2 KcCPC note the content of the paragraph

14.3.3 KcCPC note the content of the paragraph

14.3.4 KcCPC note the content of the paragraph

14.3.5 KcCPC note the content of the paragraph

14.3.6 KcCPC note the content of the paragraph

14.3.7 KcCPC note the content of the paragraph

14.4 Overview of feedback and response to consultation

a) Introduction

14.4.1 KcCPC note the content of the paragraph

14.4.2 KcCPC note the content of the paragraph

14.4.3 KcCPC note the content of the paragraph

14.4.4 KcCPC note the content of the paragraph

14.4.5 KcCPC note the content of the paragraph

14.4.6 KcCPC note the content of the paragraph

b) Overview of feedback from the Stage 2 consultation and response to consultation

14.4.7 KcCPC note the content of the paragraph

14.4.8 KcCPC note the content of the paragraph

14.4.9 KcCPC note the content of the paragraph

14.4.10 KcCPC note the content of the paragraph

14.4.11 KcCPC note the content of the paragraph

14.4.12 KcCPC note the content of the paragraph

14.4.13 KcCPC note the content of the paragraph

14.4.14 KcCPC note the content of the paragraph

14.4.15 KcCPC note the content of the paragraph

14.4.16 KcCPC note the content of the paragraph

14.4.17 KcCPC note the content of the paragraph

14.4.18 KcCPC note the content of the paragraph

14.4.19 KcCPC note the content of the paragraph

14.4.20 KcCPC note the content of the paragraph and Table 14.1

14.4.21 KcCPC note the content of the paragraph

c) Transport

14.4.22 KcCPC note the content of the paragraph

14.4.23 KcCPC note the content of the paragraph

14.4.24 KcCPC note the content of the paragraph

14.4.25 KcCPC note the content of the paragraph

14.4.26 KcCPC note the content of the paragraph

14.4.27 KcCPC note the content of the paragraph, Figure 14.2 and 14.3

d) Environmental considerations

14.4.28 KcCPC note the content of the paragraph

14.4.29 KcCPC note the content of the paragraph

14.4.30 KcCPC note the content of the paragraph

14.4.31 KcCPC note the content of the paragraph

14.4.32 KcCPC note the content of the paragraph

14.4.33 KcCPC note the content of the paragraph

14.4.34 KcCPC note the content of the paragraph

14.4.35 KcCPC note the content of the paragraph

e) Socio-economic

14.4.36 KcCPC note the content of the paragraph

14.4.37 KcCPC note the content of the paragraph

f) Construction and operational requirements

14.4.38 KcCPC note the content of the paragraph

14.4.39 KcCPC note the content of the paragraph

14.4.40 KcCPC note the content of the paragraph

14.5 Proposed development

14.5.1 KcCPC note the content of the paragraph

14.5.2 KcCPC note the content of the paragraph

14.5.3 KcCPC note the content of the paragraph

a) General arrangement overview

14.5.4 KcCPC note the content of the paragraph

14.5.5 KcCPC note the content of the paragraph and Figure 14.2

14.5.6 KcCPC note the content of the paragraph

14.5.7 KcCPC note the content of the paragraph

14.5.8 KcCPC note the content of the paragraph

b) Access

14.5.9 KcCPC note the content of the paragraph and Figure 14.2

14.5.10 KcCPC note the content of the paragraph

14.5.11 KcCPC note the content of the paragraph and Figure 14.2

14.5.12 KcCPC note the content of the paragraph

14.5.13 KcCPC note the content of the paragraph and Figures 14.4-14.6

14.5.14 KcCPC note the content of the paragraph

c) Buildings, structures and lighting

14.5.15 KcCPC note the content of the paragraph

14.5.16 KcCPC note the content of the paragraph

KcCPC is concerned that lighting on site be kept to a minimum, but enough for adequate security and personal safety. And that in doing so, downlighting from low level columns or stub posts predominate to minimise any light spill.

14.5.17 KcCPC note the content of the paragraph

d) Landscaping and drainage

14.5.18 KcCPC note the content of the paragraph and Figure 14.2

KcCPC note absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class). KcCPC note the increased importance of these provisions given the potential use of part of the Park and Ride site for HGV lay-up in the event of a Traffic Incident and/or A12 closure.

14.5.19 KcCPC note the content of the paragraph

14.5.20 KcCPC note the content of the paragraph

14.5.21 KcCPC note the content of the paragraph

KcCPC welcome the early publication of EDF Energy's 'Park and Ride Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as a parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

e) Construction

14.5.22 KcCPC note the content of the paragraph

KcCPC note EDF Energy expect "that construction work for this facility would take place over a period of approximately 12-18 months." yet give no 'in service' date.

14.5.23 KcCPC note the content of the paragraph

14.5.24 KcCPC note the content of the paragraph

f) Operation

14.5.25 KcCPC note the content of the paragraph

14.5.26 KcCPC note the content of the paragraph

14.5.27 KcCPC note the content of the paragraph

14.5.29 KcCPC note the content of the paragraph

14.5.30 KcCPC note the content of the paragraph

14.5.31 KcCPC note the content of the paragraph

14.5.32 KcCPC note the content of the paragraph

14.5.33 KcCPC note the content of the paragraph

14.5.34 KcCPC note the content of the paragraph

g) Removal and reinstatement

14.5.35 KcCPC note the content of the paragraph

14.5.36 KcCPC note the content of the paragraph

15 Freight Management Facilities (Volume 1, Pages 363 to 368)

15.1 Introduction

15.1.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's avowed intent "…to deliver the Sizewell C project so that adverse transport effects on the environment and local communities are limited through mitigation, in advance of impacts being felt…" and in that connection welcome in principal the professional marshalling of HGV traffic, prior to it going north on the A12.

The A12 is the only primary north-south route in the Suffolk Coastal area and is a de-trunked road comprising; several stretches of single carriageway, many roundabouts, incidences of uncontrolled cross flow turning, peak time congestion, and other more esoteric problematic attributes.

15.1.2 KcCPC note the content of the paragraph

KcCPC note EDF Energy in developing their transport strategy have "…sought to take account of the nature of the local highway network in the development and design of its proposals. We have sought opportunities to limit the traffic and traffic-related effects of moving freight using nonroad based transport where feasible…".

15.1.3 KcCPC note the content of the paragraph

KcCPC note EDF Energy are bringing forward two proposals at Stage 3 and broadly welcome the proposal to operate a Freight Management Facility.

However, having accumulated knowledge and experience of the A12 over many decades (both as residents, business operators and in some cases freight handlers), members of KcCPC believes that irrespective of which proposal forms the basis on an application for a development order, a Freight Management Facility will be essential.

Moreover, KcCPC believes that similar marshalling and release controls will be necessary at the Sizewell C Main construction site if the southbound A12 and A14 J58 westbound are to continuing operating without crippling congestion.

KcCPC also note that despite potentially dealing with 15% of the projected inbound (and outbound?) HGV traffic, the A12 northbound from the B1122 seemingly lacks any marshalling or control mechanisms, unless that is, a DMS system is adjudged by EDF Energy as a competent proxy for a FMF?

15.1.4 KcCPC note the content of the paragraph and Figure 15.1

KcCPC note EDF Energy have two identified potential Freight Management Facilities on which they would like receive views, the first being:

- Seven Hills – 9.9ha site accessed by a left turn from the (Old) Felixstowe Road

The second being

- Innocence Farm - 115ha site to the north of the A14, accessed by a left turn

KcCPC comments are made in response to individual paragraphs of this chapter.

15.1.5 KcCPC note the content of the paragraph and Figure 15.1

15.2 Scheme requirements

15.2.1 KcCPC note the content of the paragraph

15.2.2 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class). KcCPC note the increased importance of these provisions given the potential use marshalling and for HGV lay-up in the event of a Traffic Incident and/or A14 closure. KcCPC note during the construction phase 'spill kits' specified, but these do not appear to have improved upon or been carried across to operation.

In addition, KcCPC would welcome the early publication of EDF Energy's 'FMF Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as a marshalling facility) to return the land to greenfield agricultural land (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

15.3 Overview of feedback and response to consultation

a) Stage 1 consultation feedback

15.3.1 KcCPC note the content of the paragraph

15.3.2 KcCPC note the content of the paragraph

15.3.3 KcCPC note the content of the paragraph

15.3.4 KcCPC note the content of the paragraph

15.3.5 KcCPC note the content of the paragraph

b) Stage 2 consultation feedback

15.3.6 KcCPC note the content of the paragraph

15.3.7 KcCPC note the content of the paragraph

15.3.8 KcCPC note the content of the paragraph

15.3.9 KcCPC note the content of the paragraph

15.3.10 KcCPC note the content of the paragraph

c) Response to consultations

15.3.11 KcCPC note the content of the paragraph

15.3.12 KcCPC note the content of the paragraph

15.3.13 KcCPC note the content of the paragraph

KcCPC note that EDF Energy acknowledge it necessary to "…intercept longer distance HGV traffic before they enter the more restricted lengths of the A12."

15.3.14 KcCPC note the content of the paragraph

15.3.15 KcCPC note the content of the paragraph

KcCPC note that EDF Energy "…have taken account of the first draft Suffolk Coastal Local Plan…"

15.3.16 KcCPC note the content of the paragraph

15.4 Site option descriptions and proposed development

15.4.1 KcCPC note the content of the paragraph and Figure 15.1

a) Option 1: A12/A14 Seven Hills site

Site description

15.4.2 KcCPC note the content of the paragraph

KcCPC note the site description but are unclear of the access egress route being proposed either:

Access

- A14 J58, onto A1156
- Past Crematorium
- Left onto (Old) Felistowe Road
- Left into FMF

Or

- Eastbound A14 J59 to Trimley St Martin roundabout
- Circulate roundabout
- Westbound A14
- Access (Old) Felixstowe Road to left
- Right into FMF crossing flow

Egress

- Right from FMF, crossing over flow
- Right onto A1156, crossing flow
- Past crematorium to A14 J58 roundabout

Or

- Left from FMF along (Old) Felixstowe Road
- Left onto A14 Westbound at High Road (or prior?)

15.4.3 KcCPC note the content of the paragraph

15.4.4 KcCPC note the content of the paragraph

KcCPC note the potential presence of bat roosts bordering the site and await details of EDF Energy's lighting plan in the event these are confirmed.

15.4.5 KcCPC note the content of the paragraph

KcCPC note the SCDC Local Plan categorises the site as 'Countryside'

15.4.6 KcCPC note the content of the paragraph

15.4.7 KcCPC note the content of the paragraph

15.4.8 KcCPC note the content of the paragraph

Proposed Development

15.4.9 KcCPC note the content of the paragraph and Figure 15.2

KcCPC note that EDF Energy do not indicate how waste from the on-site toilet and rest room. Should this site be confirmed as EDF Energy's proposed location, KcCPC look forward to the details accompanying any application for a development order.

15.4.10 KcCPC note the content of the paragraph

15.4.11 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class) and/or the cumulative impacts of small or minor losses of diesel, petrol or noxious liquids over the lifetime of the Freight Management Facility.

15.4.12 KcCPC note the content of the paragraph

KcCPC note the potential presence of bat roosts bordering the site and await details of EDF Energy's lighting plan in the event these are confirmed.

15.4.13 KcCPC note the content of the paragraph

15.4.14 KcCPC note the content of the paragraph

KcCPC note no indication of;

- anticipated construction HGV movements
- anticipated effectiveness date

15.4.15 KcCPC note the content of the paragraph

KcCPC note the operational hours are expected to be;

- 7.5 hours a day – 5 days a week up to a maximum of
- 24 hours a day – seven days a week

KcCPC presume (from the phrasing of this paragraph) what EDF Energy are actually seeking is a total 365-day flexible plan.

As a consequence, KcCPC look forward to a better, more detailed (and evidenced) plan accompanying any application for a development order. date

15.4.16 KcCPC note the content of the paragraph

b) Option 2: Innocence site

Site description

15.4.17 KcCPC note the content of the paragraph

KcCPC note the site description and in the absence of a clear indication, assume the access and egress route being proposed to be:

Access

- A14 Eastbound past A14 J58
- Left onto Innocence Lane
- Right into FMF, crossing the A14 bound flow

Egress

- Left from FMF
- Left onto A14 Eastbound
- Take A14 J59
- Circulate the Trimley St Martin roundabout
- Exit roundabout to Westbound A14

15.4.18 KcCPC note the content of the paragraph

15.4.19 KcCPC note the content of the paragraph

15.4.20 KcCPC note the content of the paragraph

KcCPC note the potential for the site (full allocation) to be shared by multiple 'major energy infrastructure project' owners and wonder what co-ordination is being exercised to ensure minimal disruption to residents, businesses and ecology in the immediate and mid-distance areas?

Proposed Development

15.4.21 KcCPC note the content of the paragraph and Figure 15.3

KcCPC note that EDF Energy do not indicate how waste from the on-site toilet and rest room. Should this site be confirmed as EDF Energy's proposed location, KcCPC look forward to the details accompanying any application for a development order.

15.4.22 KcCPC note the content of the paragraph

15.4.23 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class) and/or the cumulative impacts of small or minor losses of diesel, petrol or noxious liquids over the lifetime of the Freight Management Facility.

15.4.24 KcCPC note the content of the paragraph

15.4.25 KcCPC note the content of the paragraph

15.4.26 KcCPC note the content of the paragraph

KcCPC note no indication of;

- anticipated construction HGV movements
- anticipated effectiveness date

15.4.27 KcCPC note the content of the paragraph

KcCPC note the operational hours are expected to be;

- 7.5 hours a day – 5 days a week up to a maximum of
- 24 hours a day – seven days a week

KcCPC presume (from the phrasing of this paragraph) what EDF Energy are actually seeking is a total 365-day flexible plan.

As a consequence, KcCPC look forward to a better, more detailed (and evidenced) plan accompanying any application for a development order.

15.4.28 KcCPC note the content of the paragraph

16 **Yoxford Roundabout** (Volume 1, Pages 369 to 373)

16.1 Introduction

16.1.1 KcCPC note the content of the paragraph

KcCPC is clear that it is for Yoxford Parish Council, the residents and businesses of the Parish to determine where proposals are being brought forward by EDF Energy, if they are suitable and advantageous mitigations for any potential damage to the built environment, health and well-being of the village. It is assumed that Yoxford may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed roundabout ancillary works.

16.1.2 KcCPC note the content of the paragraph

16.1.3 KcCPC note the content of the paragraph

16.1.4 KcCPC note the content of the paragraph

16.1.5 KcCPC note the content of the paragraph

16.2 Site requirements

16.2.1 KcCPC note the content of the paragraph

16.2.2 KcCPC note the content of the paragraph

16.3 Site description

16.3.1 KcCPC note the content of the paragraph

16.3.2 KcCPC note the content of the paragraph

16.4 Overview of feedback and response to consultation

a) Introduction

16.4.1 KcCPC note the content of the paragraph

16.4.2 KcCPC note the content of the paragraph

16.4.3 KcCPC note the content of the paragraph

b) Overview of feedback from the Stage 2 consultation and response to consultation

16.4.4 KcCPC note the content of the paragraph

16.4.5 KcCPC note the content of the paragraph

16.4.6 KcCPC note the content of the paragraph

c) Environmental considerations

16.4.7 KcCPC note the content of the paragraph

16.4.8 KcCPC note the content of the paragraph

16.4.9 KcCPC note the content of the paragraph

d) Construction and operational requirements

16.4.10 KcCPC note the content of the paragraph and Figure 16.1

16.4.11 KcCPC note the content of the paragraph

KcCPC note "abnormal indivisible loads (AILs) bound for Sizewell B or Sizewell C would need to pass through the A12/B1122 Yoxford roundabout since a vehicle of that size could not negotiate the roundabout." but are confused, as seemingly AILs were the justification for the Beach Landing Facility (BLF)?

KcCPC regrettably have to conclude that EDF Energy are being opportunistic and instead of making a decision are effectively 'backing two horses'. Presumably, in the hope that one (probably the one at least monetary cost and most rapidly deployable) meets with little opposition.

16.5 Proposed development

16.5.1 KcCPC note the content of the paragraph

16.5.2 KcCPC note the content of the paragraph

KcCPC note the absence of an 'effective' target date, with 'early years' offering little clarity. It seems improbable at Stage 3 that, EDF Energy do not have a fully developed draft project plan with all significant dependencies and interdependencies identified. Consequently, KcCPC can only speculate as to why EDF Energy are unable (or unwilling) to put a milestone plan in the public domain, that just might assuage some local fears?

KcCPC also note that no construction metrics are provided (i.e. HGV movements and workforce).

16.5.3 KcCPC note the content of the paragraph and Figure 16.1

16.5.4 KcCPC note the content of the paragraph and Figure 16.1

16.5.5 KcCPC note the content of the paragraph and Figure 16.2

16.5.6 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to adopt a highway lighting design standard, which implies lighting columns of (typically) 10m in height, and questions whether this is in keeping with the immediate surroundings and/or necessary?

16.5.7 KcCPC note the content of the paragraph

KcCPC note the absence of provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from traffic using the newly constructed roundabout, and/or preventing it seeping into the surrounding environment and water course. This type of incident is increasingly likely as a result of the volume of HGV, Bus and LGV's using this route.

16.5.8 KcCPC note the content of the paragraph

See note at 16.5.7 above. KcCPC wonder whether the detention pond could be designed to be utilised for the purpose of collecting 'spillage' from the revised roundabout in the event of an incident?

16.5.9 KcCPC note the content of the paragraph

See note at 16.5.7 and 16.5.8 above

16.5.10 KcCPC note the content of the paragraph

	See note at 16.5.2 above
16.5.11	KcCPC note the content of the paragraph
16.5.12	KcCPC note the content of the paragraph

17 Highway improvements, cycling and rights of way (Volume 1, Pages 374 to 402)

17.1 Introduction

17.1.1 KcCPC note the content of the paragraph

17.1.2 KcCPC note the content of the paragraph

17.1.3 KcCPC note the content of the paragraph

17.1.4 KcCPC note the content of the paragraph

17.1.5 KcCPC note the content of the paragraph

17.2 Highway improvements

17.2.1 KcCPC note the content of the paragraph

17.2.2 KcCPC note the content of the paragraph

17.2.3 KcCPC note the content of the paragraph

17.2.4 KcCPC note the content of the paragraph

17.2.5 KcCPC note the content of the paragraph

17.2.6 KcCPC note the content of the paragraph

17.3 A140/B1078 west of Coddenham

a) Site description

17.3.1 KcCPC note the content of the paragraph and Figure 17.1

17.3.2 KcCPC note the content of the paragraph

b) Future conditions in 2022 and 2027 – reference case

17.3.3 KcCPC note the content of the paragraph

17.3.4 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.3.5 KcCPC note the content of the paragraph

17.3.6 KcCPC note the content of the paragraph

d) Junction improvements

17.3.7 KcCPC note the content of the paragraph and Figure 17.2

17.3.8 KcCPC note the content of the paragraph

17.3.9 KcCPC note the content of the paragraph

17.4 B1078/B1079 east of Easton & Otley College

a) Site description

17.4.1 KcCPC note the content of the paragraph and Figure 17.3

17.4.2 KcCPC note the content of the paragraph

b) Future conditions in 2022 and 2027 – reference case

17.4.3 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.4.4 KcCPC note the content of the paragraph

17.4.5 KcCPC note the content of the paragraph

d) Junction improvements

17.4.6 KcCPC note the content of the paragraph and Figure 17.4

17.4.7 KcCPC note the content of the paragraph

17.4.8 KcCPC note the content of the paragraph

17.5 A12/B1119 Saxmundham

a) Site description

17.5.1 KcCPC note the content of the paragraph and Figure 17.5

17.5.2 KcCPC note the content of the paragraph

17.5.3 KcCPC note the content of the paragraph

KcCPC is keen to ensure that EDF Energy give full consideration to this junction in full knowledge that traffic volumes at this junction are subject to significant fluctuations, from three principal causes:

A] access and egress to/from Carlton Meres Holiday Park, currently extending further
B] A12 crossing flows, West to East and East to West allied to coastal bound holiday traffic/return
C] Seasonal events (i.e. Latitude, Folk East, Henham Steam Festival, Motocross, etc.)

This is not an exhaustive list, but indicative of issues evident at the A12/B1119 junction.

b) Future conditions in 2022 and 2027 – reference case

17.5.4 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.5.5 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "…the early years element of Sizewell C construction traffic, traffic flows on the A12 increase by 8% but the junction would still operate with spare capacity…". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

17.5.6 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "…Sizewell C development would increase the traffic at this junction by up to 4% by the peak construction year of 2027. The junction would continue to operate with spare capacity." rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

17.5.7 KcCPC note the content of the paragraph

In light of the assertions at 17.5.5 & 17.5.6 (above), KcCPC is particularly interested to note that "additional traffic generated from Sizewell C construction could exacerbate the identified road safety issues. To minimise this risk, EDF Energy proposes minor safety improvements…"

d) Junction improvements

17.5.8 KcCPC note the content of the paragraph and Figure 17.6

17.5.9 KcCPC note the content of the paragraph

17.5.10 KcCPC note the content of the paragraph

KcCPC is doubtful if EDF Energy have any tangible evidence to support the assertion that "EDF Energy expects that these highway improvements would…mitigate the impact of additional Sizewell C traffic on the junction." but would welcome the opportunity to explore with them any evidence they are able to provide.

17.6 A1094/B1069 south of Knodishall

a) Site description

17.6.1 KcCPC note the content of the paragraph and Figure 17.7

17.6.2 KcCPC note the content of the paragraph

17.6.3 KcCPC note the content of the paragraph

b) Future conditions in 2022 and 2027 – reference case

17.6.4 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.6.5 KcCPC note the content of the paragraph

17.6.6 KcCPC note the content of the paragraph

17.6.7 KcCPC note the content of the paragraph

d) Junction improvements

17.6.8 KcCPC note the content of the paragraph and Figure 17.8

17.6.9 KcCPC note the content of the paragraph

17.6.10 KcCPC note the content of the paragraph

17.7 A12/A1094 Friday Street northeast of Farnham

17.7.1 KcCPC note the content of the paragraph

a) Site description

17.7.2 KcCPC note the content of the paragraph and Figure 17.9

17.7.3 KcCPC note the content of the paragraph

b) Future conditions in 2022 and 2027 – reference case

17.7.4 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.7.5 KcCPC note the content of the paragraph

17.7.6 KcCPC note the content of the paragraph

d) Junction improvements

17.7.7 KcCPC note the content of the paragraph and Figure 17.10

17.7.8 KcCPC note the content of the paragraph

17.8 A12/A144 south of Bramfield

a) Site description

17.8.1 KcCPC note the content of the paragraph and Figure 17.11

17.8.2 KcCPC note the content of the paragraph

17.8.3 KcCPC note the content of the paragraph

b) Future conditions in 2022 and 2027 – reference case

17.8.4 KcCPC note the content of the paragraph

c) Future conditions in 2022 and 2027 – including Sizewell C

17.8.5 KcCPC note the content of the paragraph

d) Junction improvements

17.8.6 KcCPC note the content of the paragraph and Figure 17.12

17.8.7 KcCPC note the content of the paragraph

17.8.8 KcCPC note the content of the paragraph

17.8.9 KcCPC note the content of the paragraph

17.9 Wickham Market diversion route via Valley Road & Easton Road

17.9.1 KcCPC note the content of the paragraph

17.9.2 KcCPC note the content of the paragraph

a) Site description

17.9.3 KcCPC note the content of the paragraph

b) Highway improvements

17.9.4 KcCPC note the content of the paragraph and Figures 17.3, 17.4 and 17.5

KcCPC whilst not directly impacted by the proposed changes, are advised that local opinion is opposed the proposals of EDF Energy in totality, and that the Parish Council are bringing forward their own proposals dealing with a number of conjoined issues effecting Wickham Market traffic circulation.

As a consequence, whilst KcCPC notes the content at the Stage 3 consultation, it further reinforces its previously stated view that, it is the local organisations in Wickham Market who should be allowed to express their individual and collective views, prior to any proposal going forward.

17.9.5 KcCPC note the content of the paragraph

17.9.6 KcCPC note the content of the paragraph

17.9.7 KcCPC note the content of the paragraph

17.9.8 KcCPC note the content of the paragraph

17.9.9 KcCPC note the content of the paragraph

17.9.10 KcCPC note the content of the paragraph

17.9.11 KcCPC note the content of the paragraph

17.10 Mill Street (B1122)

17.10.1 KcCPC note the content of the paragraph

a) Site description

17.10.2 KcCPC note the content of the paragraph

b) Highway improvements

17.10.3 KcCPC note the content of the paragraph and Figure 17.6

KcCPC whilst not directly impacted by the proposed changes, as a consequence, whilst KcCPC notes the content at the Stage 3 consultation, it further reinforces its previously stated view that, it is the local organisations who should be allowed to express their individual and collective views, prior to any proposal going forward.

17.10.4 KcCPC note the content of the paragraph

17.10.5 KcCPC note the content of the paragraph

17.10.6 KcCPC note the content of the paragraph

17.11 Sizewell C Rights of Way and Open Access Strategy

17.11.1 KcCPC note the content of the paragraph and Figures 17.17 and 17.18

17.11.2 **a) Construction Phase**

KcCPC note the intended strategic approach of EDF Energy as:

- to minimise physical disturbance of existing rights of way and open access areas including the beach, open access land, the permissive networks and promoted cycle routes;
- to ensure that any necessary alternative routes meet the best interests of the user in respect of directness, safety and quality;
- to retain connectivity, where possible, especially north-south connectivity;
- to minimise disturbance (physical and amenity) to the Suffolk Coast Path, Sandlings Walk, the future England Coast Path and open access on the coast;
- to provide appropriate temporary diversion routes where disturbance or physical closure of routes cannot be avoided; and
- where possible and/or reasonable, to provide mitigation to rights of way, open access land and promoted cycle routes to minimise effects on their amenity.

KcCPC wish to draw EDF Energy's attention to 5 points prior to finalising their strategy, specifically:

1] The area of Coastal Suffolk bounded by the North Sea to the East and the A12 to the West is visited by a great many tourists who take their leisure enjoying the rich variety of countryside and exploiting the network of PRoW.

2] Likewise residents, daily visitors and special interest groups also enjoy the network of the PRoW

3] Two things are common, irrespective of the type of user – one is the connectivity of the network, the second is not whether it is direct (as EDF Energy imply), but that it takes them through rural environments where vista's, flora, fauna and quiet abound.

4] Proprietary and locally produced walk route maps are the most regularly used navigation aids, along with 'word of mouth' or accommodation 'walk sheets'. Consequently, any changes made as a result of Sizewell C will have to be agreed early and communicated widely to ensure visitor and local resident enjoyment of the countryside can continue and that map producers can make the necessary amendments.

5] EDF Energy must also be aware that the PRoW network is also the most direct route to wildlife encounters and be careful in creating new routes or diversions that they do not destroy the very habitats that shelter and support a wide range of mammals, birds, plants and insects, some of which are endangered and many of which are protected. For example, most recently, a small but thriving colony of the Sandy Stiltball were found in Kelsale cum Carlton

b) Operation phase

KcCPC note the intended strategic approach of EDF Energy as:

- to restore any rights of way within the main development site and open access to the coast that were closed or diverted during construction and seek opportunities for enhancement;
- to seek to improve the amenity and physical condition of the rights of way network and open access on the coast across the EDF Energy estate;

- where possible and/or reasonable, to improve connectivity and linkages through the wider area, especially north south connectivity; and

- where possible and/or reasonable, to improve provision of routes within the EDF Energy estate;

KcCPC would draw EDF Energy's attention the points made above in respect to the Construction phase (above) and ask in seeking to implement their strategy they seek local expertise to advise the degree of 'improve' activity that is undertaken.

17.11.3 KcCPC note the content of the paragraph

17.12 Rights of way and proposed improvements

a) Existing rights of way

17.12.1 KcCPC note the content of the paragraph

17.12.2 KcCPC note the content of the paragraph and Figure 17.19

17.12.3 KcCPC note the content of the paragraph

b) Construction

17.12.4 KcCPC note the content of the paragraph

17.12.5 KcCPC note the content of the paragraph and Figure 17.17

17.12.6 KcCPC note the content of the paragraph

17.12.7 KcCPC note the content of the paragraph

17.12.8 KcCPC note the content of the paragraph

17.12.9 KcCPC note the content of the paragraph and Figure 17.17

17.12.10 KcCPC note the content of the paragraph

17.12.11 KcCPC note the content of the paragraph

17.12.12 KcCPC note the content of the paragraph

17.12.13 KcCPC note the content of the paragraph

17.12.14 KcCPC note the content of the paragraph

17.12.15 KcCPC note the content of the paragraph

17.12.16 KcCPC note the content of the paragraph

17.12.17 KcCPC note the content of the paragraph

c) Operational phase strategy

17.12.18 KcCPC note the content of the paragraph

17.12.19 KcCPC note the content of the paragraph

17.12.20 KcCPC note the content of the paragraph

17.12.21 KcCPC note the content of the paragraph

17.12.22 KcCPC note the content of the paragraph

17.12.23 KcCPC note the content of the paragraph

17.12.24 KcCPC note the content of the paragraph

17.12.25 KcCPC note the content of the paragraph

d) Further development of rights of way proposals

17.12.26 KcCPC note the content of the paragraph

17.13 Cycling

a) Introduction

17.13.1 KcCPC note the content of the paragraph

b) Existing cycling and Sizewell C construction traffic routes

17.13.2 KcCPC note the content of the paragraph

17.13.3 KcCPC note the content of the paragraph

17.13.4 KcCPC note the content of the paragraph

c) Proposed improvements to cycling infrastructure

17.13.5 KcCPC note the content of the paragraph and Table 17.1

d) Proposed new cycle route

17.13.6 KcCPC note the content of the paragraph and Figure 17.20

17.13.7 KcCPC note the content of the paragraph and Figure 17.20

17.13.8 KcCPC note the content of the paragraph

17.13.9 KcCPC note the content of the paragraph

17.13.10 KcCPC note the content of the paragraph

17.13.11 KcCPC note the content of the paragraph

17.13.12 KcCPC note the content of the paragraph

17.13.13 KcCPC note the content of the paragraph

Document ends – See Appendices

Your Ref: EN010012
Our Ref:
Date: 22nd May 2014
Enquiries to: Michael Wilks / Philip Ridley
Tel: 01473 264064 / 01394 444432
Email: michael.wilks@suffolk.gov.uk /
philip.ridley@suffolkcoastal.gov.uk

Suffolk County Council

Suffolk Coastal District Council

Laura Allen
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Dear Ms Allen

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) – Regulations 8 and 9

Application by EDF Energy for an Order Granting Development Consent for the Sizewell C Proposed Nuclear Development

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Further to your letter dated 24th April 2014, please find below a joint response of both Suffolk County Council and Suffolk Coastal District Council to this request.

EXECUTIVE SUMMARY

The approach set out to the Environmental Statement (ES) is generally satisfactory and we are pleased that it reflects the nature of, and progress in, discussions the local authorities have had with EDF Energy on the undertaking of assessments to date.

However, we draw particular attention to the following matters:

- Further discussions are required with EDF in describing the magnitude of impacts, in particular the spatial extent and duration of effect that are used to derive the corresponding magnitude. As currently described, the ES is likely to underreport localised impacts of significant duration. A better acknowledgement of the longevity of the temporary, but long-term construction period is required.
- We are concerned that alternatives are being scoped out of the process at an early stage, without a full appreciation of the effects of EDF's preferred option. Alternatives should be appraised having regard to the respective socio-economic and environmental effects alongside consideration of operational requirements. The ES should clearly articulate how alternatives have been evaluated in a balanced way.
- The ES should clearly articulate the cumulative effects of all individual elements of the project as many receptors will be impacted by separate developments. This needs to be fully acknowledged.
- The phasing of the construction programme needs to be provided and sensitivity testing in the timing of the delivery of mitigation proposals, such as the MOLF, accommodation, campus, park and rides and rail extension undertaken so that they are delivered at the

optimum time having regards to the impacts associated with their construction, and their ability to reduce impacts on local communities and the environment.

Some general, introductory comments are made immediately below, followed by some more detailed comments relating to the specific sections in the Scoping Report.

1. GENERAL COMMENTS

1.1. Structure of the Environmental Statement

1.1.1. It is proposed that Volume 2 of the ES focuses on 'Project-wide considerations', namely socio-economics and transport, whereas environmental matters are to be considered on a site-specific basis.

1.1.2. The ES should acknowledge the scale and the geographic extent of the development is such that it will have very wide ranging environmental effects over a large area, particularly when one considers:

- The environmental effects of the offsite associated development sites
- The environmental effects of transport movements, terrestrially and at sea
- The environmental effects associated with the deflection or displacement of recreational users to wider/alternative areas.

1.1.3. Consequently, we would not wish the environmental impacts to be presented in such a way that the full scale of effects is not readily appreciable. In addition to interactions with other projects or programmes Volume 9 (Cumulative assessment) therefore needs to consider the cumulative effect of all the individual elements of the project, particularly where they impact on the same receptor (for example the rail line extension, site entrance works and the campus will all separately impact on Leiston Abbey). It would also, in this vein, be useful for the ES to explain the interrelationship with the Habitats Regulation Assessment.

1.1.4. Conversely, we would not wish the *localised* transport and socio-economic impacts to be underplayed. For example, the campus will have localised impacts by virtue of its proximity to other communities which may be presented in such a way that other socio-economic impacts on the labour market or accommodation availability take dominance.

1.1.5. There is a particular case to consider whether the impacts of the campus development (currently wrapped in to the 'Main Development Site') need to be specifically isolated within the ES, because of the particular sensitivities, environmentally and socio-economically, associated with EDF's preferred site, and the existence of alternative site locations. While the campus offers mitigation in some respects (6.3.59), it will give rise to others of its own making. In particular, the ES should assess the impact on nearby residential properties and mitigation measures included as necessary.

1.2. Magnitude of impacts – Temporary and permanent

1.2.1. The ES should clearly distinguish between temporary impacts and permanent impacts and also be consistent with how the duration of impact relates to significance of effect.

1.2.2. Table 5.2 sets out the generic guidelines for the assessment of magnitude. We have some concerns with the definitions used here. With a construction project of such magnitude, duration and geographic spread, terms such as "permanent/irreversible" and "whole development area" need to be carefully defined. A literal interpretation of this table would suggest it is not possible for a temporary

(albeit of 10 year lifespan) associated development site to result in a high magnitude effect. The table also implies a degree of rigidity in structure and conflation of the terms 'scale', 'duration' and 'certainty'. For example, wider-scale effects of temporary duration within any one of the red line areas should still be able to derive a high magnitude effect.

1.2.3. Clarity on the interpretation of likely/unlikely would be helpful. It is noted the Ecology chapter is more quantitative in this respect (7.2.28), but it is debatable that something with a 49% probability of occurring could be described as 'unlikely'.

1.2.4. So, while Table 5.2 is described as generic guidelines it could better reflect the specific circumstances of the project. It is noted that in some chapters, some of these definitions are refined – for example in Ecology and Surface Water chapters 'temporary' is further subdivided (short term <2 yrs; medium term 3-5yrs; long-term >5 years), though the Landscape chapter uses a different scale for duration of effect (short term <2 years; medium term 2-10 years; long term >10 years).

1.2.5. Above all, the ES should be consistent on how these terms are used or explain very clearly why any inconsistencies do arise.

1.3. Value and sensitivity

1.3.1. The ES, for example Table 5.1 uses these terms synonymously, whereas this may not be the case. It is possible for sites to be designated for their landscape or ecological value, i.e. be of high value, but nevertheless have capacity to accommodate change (i.e. low sensitivity). The ES should recognise this – in particular because, as written, the ES will not focus on impacts on receptors of low value, for example local nature reserves – which may nonetheless by very sensitive.

1.4. Significance of effect

1.4.1. As a result of the issues outlined above, we are concerned that impacts may be defined as of less than moderate/major significance and therefore not significant, when that is not the case. This table should continue to reflect the precautionary principle so that the burden of proof remains on EDF demonstrating robustly that impacts will be not significant.

1.5. In-combination effects ("interrelationships")

1.5.1. Consistency in terminology is particularly important to facilitate the measurement of in-combination effects. We are concerned that the ES could underreport these effects if it does not acknowledge the potential for accumulation of effects of minor significance. The ES should explain how the significance of an in-combination effect will be determined – for example, for a given receptor, is the significance of a moderate noise impact plus a moderate air quality impact moderate or major?

1.5.2. We would also expect the ES not to overlook opportunities to mitigate effects of minor significance so that they rather become 'negligible'.

1.6. Cumulative impacts

1.6.1. Paragraph 5.5.1 suggests that only cumulative effects with projects in the *vicinity of* the development site will be considered. The geographic scope will need to be considered on a case by case basis. In the case of socio-economics the approach in paragraph 6.2.42 is acknowledged, though this could overlook localised cumulative effects, for example decommissioning of Sizewell A.

1.6.2. The ES should recognise that as a consequence of the Sizewell C development, the impact of existing development may change. For example if Coronation Wood is used (3.3.6/3.4.1), this may affect the mitigation it offers for the existing Sizewell A and B developments. Consequently the assessment of the

cumulative impacts should reflect any changes in the future baseline that would heighten the impact of existing development. The onshore elements of the consented Galloper Offshore Windfarm are also relevant in this respect.

1.6.3. Paragraph 2.1.9 confirms that while Sizewell is connected to the National Grid's high voltage network, local modifications and wider network reinforcement is required – the local authorities understand this to be reconductoring of the Sizewell to Bramford line, and additionally a new line between Bramford and Twinstead – registered with PINS as the 'Bramford to Twinstead Overhead Line project'. The most up to date Need Case for that project, confirms that, based on the currently contracted connection dates, Sizewell C, alongside the East Anglia Array, is a significant contributor to that need – however it is the Sizewell C project that currently triggers the need for the Bramford to Twinstead project[1].

1.6.4. The Environmental Statement should address the wider environmental implications of development elsewhere necessitated in whole or in part by the Sizewell C project.

1.6.5. Furthermore, paragraph 6.3.58 states EDF will provide "support to Network Rail to deliver a new passing loop on the East Suffolk Line near Wickham Market station. This is not discussed further in the Scoping Report (for example as offsite associated development). The impacts of this should be presented in the ES. The location of this development is adjacent to a new housing development and consideration should therefore be given to minimising train waiting times during passing manoeuvres, or exploring other engineering options (such as lengthening the loop) to minimise impacts on those residents.

1.7. Future baseline

1.7.1. With regard to the future environmental baseline, it should be noted that all non-agricultural land within the Main Development Site is managed by Suffolk Wildlife Trust on behalf of EDF Energy (7.9.15). Consequently, the ES should not underestimate the environmental quality of the future baseline without development, and thus underestimate the impacts of the development.

1.7.2. Furthermore, the ES should recognise that the projected future baseline case includes consideration of how the Sizewell A and B sites will change under decommissioning over the construction life of SZC.

1.8. Construction Programme

1.8.1. The ES should provide a phasing programme for construction so it is clear which activities are occurring when, and when mitigation will be delivered – for example the park and ride sites, rail routes, jetty and accommodation campus. The timing of these will have a significant bearing on the impacts of the development and the local authorities suggest very careful thought will be needed to ensure that they are delivered at the optimum time in the construction programme.

1.8.2. We note (3.4.7) that the main construction could take seven to nine years following site preparation – which would include main site earthworks construction of a new access road, new bridges, and a jetty (3.4.2). The ES should ensure that the full duration of activity is reported accurately.

[1] http://nationalgrid.opendebate.co.uk/files/20131114_Need_Case_2013_FINAL.PDF Figure 4.1

1.8.3. Along with the phasing, the ES will need also need to detail the location of all major engineering tasks to be carried out (for example excavation work, dredging, dewatering, piling, stockpiling of soil/peat, road building, demolition of existing buildings, use of explosives, construction of new buildings, borrow pit workings *et cetera*). It should be clear where engineering works are contingent on offsite constraints, such as the receiving capacity of Wallasea Island to accommodate any peat winnings (3.4.5). A worst case in terms of the need for stockpiling should be assumed.

1.8.4. ES will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. It is noted that 24 hour working shift patterns are likely to be used and consideration will need to be given to mitigating noise from night time and weekend works.

1.9. Alternatives

1.9.1. We welcome the intention (paragraph 4.2.1) to review alternatives for land required during construction (taken to mean not just the laydown land, but also all the associated development) – this consideration should of course not just include layout, but overall scale and location. With particular regard to sea defences (4.3.2), consideration also needs to be given to the north and south of the site, if coastal erosion and flooding affect these areas as may be predicted. The ILWS is taken to be included on this list under Main Development Site.

1.9.2. With reference to the construction laydown land adjacent to the main site, particular regard should be had to alternative options which reduce the impact on the AONB, for example using existing employment land in the vicinity. Similarly, the alternative of siting the Visitor Centre outside the AONB will need to be considered.

1.9.3. The local authorities are concerned that in some cases EDF has not sufficiently justified its preferred option and is therefore prematurely curtailing more detailed assessment of alternatives. Of particular relevance are the proposals for freight management. Paragraph 4.4.6 indicates that EDF does not propose to consider Freight Management Site further, given it 'anticipates' HGV movements could 'potentially' be managed through electronic/camera based systems which 'could' reduce the need for further associated development sites.

1.9.4. Given the evident uncertainty and lack of discussions/agreement with the local authorities on this matter, we do suggest it is premature to scope out the potential need for such a facility. Consequently, we suggest the ES should report should report on alternative measures to manage freight and their comparative effects. Other alternatives should include rationalising the use of land across all three nuclear sites, sharing facilities, for example parking wherever possible.

1.9.5. In presenting how EDF has come to its preferred alternative it should be clear how it has weighted the various determining factors – for example environmental impact, transport impact, cost.

1.10. Health Impact Assessment

1.10.1. The production of an HIA is welcome, however it should aim to *maximise the potential positive* health and wellbeing impacts of the proposed development', rather than solely *reduce or remove potential adverse* impacts on health and wellbeing (2.3.10). It will also need to identify *all* significant impacts on health (2.3.12).

1.10.2. The HIA should follow a similar format to that set out in Section 5.3. In terms of mitigating the adverse effects of development, the hierarchy set out in Section 5.4, namely: 1. Prevention; 2. Reduce or abate effects, is appropriate for HIA, though repair and compensation are less relevant. The plan to seek identification of

mitigation opportunities throughout the evolution of the proposed development is also applicable to health impacts. Prevention of course remains the priority for significant health impacts.

1.10.3. The sections in the ES on air quality and noise and vibration will be particularly relevant to the HIA.

1.10.4. Monitoring and evaluation of possible health impacts should be conducted to inform ongoing assessment of the health impact.

1.11. Life span of the development/decommissioning

1.11.1. The ES should be clear on the duration of effects for which it is assessing – does the 'lifetime of the site' (for example 2.1.9) include the decommissioning phase? How does this also relate to the ISFS and ILW, and their respective design lives (section 3.8)? The design life for the ILW and LLW stores should also be clarified.

1.11.2. The ES should, as far as is possible detail a programme for the decommissioning of the site. This should include;

- The types of works that will be undertaken,
- The removal of existing structures,
- The disposal of all remaining waste material,
- The suitability of the site for restoration or future use.

1.12. It is noted that a separate Flood Risk Assessment (FRA) will be produced for the decommissioning phase (2.3.4); any mitigation actions arising from this FRA may have implications for the design of the Sizewell C site – so thought needs to be given at this stage to the decommissioning FRA.

2. TOPIC SPECIFIC COMMENTS

2.1. Transport

2.1.1. The transport assessment (TA) will need to be prepared in line with the DfT's Guidance on Transport Assessments (2007). The TA, like the rest of the ES (as discussed above) should also pull together the cumulative impacts of the individual elements of the development, both the construction of the main development site, the associated development sites and any mitigation schemes.

2.1.2. The TA will also need to recognise that the benefits of highway mitigation will not apply to all stages of the development (due to the timing of their delivery) and consequently there will be phases of the development where impacts on the highway network will need to be reported in the absence of such mitigation being in place. For example, the construction of the rail line extension and MOLF will ostensibly require all HGV movements arriving by road, as opposed to later phases of the development where materials will be delivered by a combination of road, rail and sea.

Approach & Methodology

2.1.3. The scenarios assessed within the TA should include construction, operation, decommissioning and the impact of outages, of both Sizewell C and B reactors. Tourism is an important part of the Suffolk economy and the impact of construction vehicle movements on the summertime traffic movements should be assessed. A method of assessing seasonal impacts needs to be agreed. The impact on significant local events, for example the Latitude Festival also need to be considered and measures put in place to accommodate the impact that these events have on the network.

2.1.4. The report refers to the use of Visum modelling to determine impacts on the highway network, SCC considers that the use of modelling is only one way of assessing impacts and other methods should be considered. Modelling should not be relied upon as the only method of assessment.

2.1.5. The report suggests that the impacts of construction traffic are 'temporary'; the ES needs to fully acknowledge the likely duration of the construction period and report the effects accordingly.

2.1.6. The report should state the years of assessment.

2.1.7. The baseline information makes no reference to the collection of data for non-motorised users (NMU's), i.e. pedestrians, cyclists and equestrians using the highway network, this should include the Public Rights of Way network.

2.1.8. The report refers to using shift patters to assess the timings of commuter travel. However, no information was provided on how HGV/OGV movements would be managed to inform an assessment of impact.

Types of Impact

2.1.9. The report sets out the types of impact that will be examined with respect to the traffic generated. These include severance, pedestrian amenity, driver delay and accidents and safety.

2.1.10. The assessment should consider the effect the increase in traffic will have on cyclists and equestrian road users and consider the anxiety and intimidation the increase in traffic will impose. It should be noted that equestrians are sensitive to smaller increases in traffic and this group may cease to use parts of the network affected by significant increases in traffic and make established horse-riding routes untenable.

2.1.11. The types of impact should include the effects that vehicles and in particular HGV's will have on pedestrians and residents (see below).

2.1.12. The report makes no reference to the transportation of hazardous materials. The ES should clarify whether hazardous materials will be transported on the highway network to and from the site either/and during construction and operation. If hazardous material will/may be used then details need to be provided on how the impact will be assessed and mitigated.

Sensitivity of receptors

2.1.13. A classification of possible receptors and their likely sensitivity is set out in Table 6.3.1. It is unclear where these categories are derived from. This table does not refer to equestrians and cyclists, focussing on pedestrians as the only NMU's. Cyclists need to be considered either as local road users or recreational tourist based users. The latter group are likely to include family groups that would be considered more vulnerable road users with respect to increased traffic flows. It is not unreasonable to assume a higher level of recreational activity in the area considering its location to the coast and the AONB.

2.1.14. It should also be noted that the National Cycle Network regional routes 31, 41 and 42 intersect the B1119 to the west and the B1122 to the north of Leiston - in addition to intersecting the A12 at a number of locations within the study area. Impacts on users of these routes need to be assessed. More generally, rights of way crossing points should be identified a sensitive receptor and the effects of severance thereon assessed.

2.1.15. There is a further category of receptors to be considered. These are residents of dwellings likely to be affected by anxiety and intimidation from traffic passing close to their homes. This will be an issue in areas additional to the

Farnham bend. The ES should identify residential dwellings that are located close to the edge of the carriageway and categorise these as a separate category of receptor. Estimates should be made of the population of communities affected by severance due to traffic, taking into consideration the location of community facilities, including schools, relative to the road causing severance.

Magnitude of impact

2.1.16. The magnitudes of impact are set out under "Types of Impact" within the report, where the impacts are allocated to one of four categories: Negligible, Minor, Moderate and Substantial. These categories relate to those suggested in the IEMA guidelines and the DMRB, where the impact referred to here as "Minor" is termed "Slight".

2.1.17. There is some concern over the large proportion of effects that will rely on the application of "Professional Judgement" within Table 6.3.2 of the report. To inform this judgement and assist in reaching agreement, it is proposed that the assessment is informed and supported by quantifiable (evidence-based) analysis as detailed below.

Severance

2.1.18. In addition to the IEMA Guidelines, a more detailed scale of impacts is set out in DMRB 11.3.8.7 Table 1, distinguishing between Built-Up and Rural areas and providing more detail as to their application. It is recommended that reference is made to this table.

2.1.19. Furthermore, areas where a 10% increase in flows is considered significant should be identified and agreed.

2.1.20. It is noted that the categories adopted relate to changes in traffic flows along existing roads and are not related to any absolute measure of existing levels of severance. DMRB 11.3.8.6 defines three categories of severance; Slight, Moderate and Severe. Although technically these relate to new severance, i.e. new highway schemes, they provide one possible way of quantifying severance in absolute rather than relative terms. To quantify existing levels of severance, it is suggested that reference is made to these categories.

Pedestrian delay

2.1.21. The use of a threshold of 1,400 vehicles per hour is supported by IEMA guidelines, though unilaterally applying these guidelines should be avoided – regard should be had to the health impacts on reducing pedestrian amenity or increasing delays in travel. We expect the figure of 1,400 vehicles per hour to relate to an exceedance in any hour, not to represent an average.

2.1.22. To assist in some quantification of impacts above this threshold, DMRB 11.3.8.7 figure 1 should be referred to where mean pedestrian delays associated with different road crossing situations are presented in graphical form.

Pedestrian amenity

2.1.23. It is proposed that this will be assessed using professional judgment on links where there is an increase of more than 100% in either total or HGV flows. The use of a threshold of 100% does not appear consistent with the other thresholds. Using this criterion for assessing impact and risks will result in almost all of the impacts being dismissed as "Negligible".

2.1.24. It is proposed that the percentage criteria adopted for "Severance" should be used to inform the assessment of pedestrian amenity. This would mean adopting a threshold of 30% above which impacts would be assessed as Minor/Slight, Moderate

or Substantial. The 10% threshold should also be used for specifically sensitive areas.

2.1.25. The existing levels of pedestrian amenity on the network should be assessed using DMRB 11.3.8.4

Driver delay and accidents & safety

2.1.26. - The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement.

Specifically sensitive areas

2.1.27. This should include areas where there is an increase of 10% or more in HGV flows, not just total flows.

Injury and death

2.1.28. In addition to the above, the TA should include an assessment of the impact of different transport options on the incidence of transport related injury and death. This should inform the Health Impact Assessment.

Construction

2.1.29. As mentioned, the impact of Sizewell outages and other local events, for example the Latitude festival, need to be assessed/accommodated within the assessment of impacts.

Assumptions and limitations

2.1.30. The ES will need to detail the assumptions it has made on the approximate quantities of all incoming materials to be stored on site or at offsite facilities, including how this material will be transported to the site and, proportionately, by which mode.

2.1.31. The assessment of impact of construction related traffic should also consider contingency measures, for example the implication of extended bad weather preventing the use of the MOLF.

2.1.32. Sensitivity testing should also be undertaken to reflect an uncertainty of delivery of materials by rail and sea. This should include alternative plans for the delivery of Abnormal Indivisible Loads (AILs).

Potential impacts and effects

Construction

2.1.33. Clear distinctions needs to be made on the longevity and reversibility of impacts.

2.1.34. The TA will need to include an assessment of recreational trips made by residents of the campus accommodation.

2.1.35. The report refers to impacts on the A12 down to Ipswich; this should refer to the A12 down to its junction with the A14 (Copdock Interchange, Junction 55). The Highways Agency may have concerns around the management of HGV traffic on the A14, in particular at the Seven Hills (Junction 58) and Copdock junctions and over the Orwell Bridge. In the case of the closure of the Orwell Bridge, methods to manage additional HGV traffic on the diversion route through Ipswich will need to be considered.

2.1.36. In response to the Stage 1 consultation, concerns were raised about the impact of construction and commuter traffic on the B1122. This needs to be assessed.

2.1.37. Furthermore, information is required on how HGV deliveries and departures to/from the main site will be managed, together with the volumes and timing of movements associated with the accommodation campus and on-site car park. These issues should be considered within the TA.

Operation

2.1.38. This section of the report refers to the impact of the outage work for each reactor. Clarification is needed on whether this should also refer to Sizewell B and how the outages will be coordinated (if it is possible to do so). The ES will also need to describe how the outage staff will be accommodated and transported to/from the site –for example the level of additional parking.

2.1.39. Consideration should be given to assessing the traffic related to the outage works as a permanent increase on the road network during the operation phased due to their frequency and duration of its occurrence.

2.1.40. The decommissioning phase should also be assessed, as far as is possible, as it will result in an impact over an extended period of time. It may also overlap with the elements of the decommissioning programme of Sizewell B - more information is required.

Potential mitigation

2.1.41. The detail of mitigation provided in the report is considered an early estimate and is not considered exhaustive. An assessment using the criteria set out in Section 6.3, with the additional assessment requirements detailed in this response is likely to identify the need for additional mitigation measures, which will require environmental assessment. In particular reference should be made to the active transport options for the workforce, for example cycle routes to/from park and ride sites. We have also at Stage 1 indicated broad parameters for a Travel Plan, which will need to be provided within the ES.

2.1.42. An effective method of managing the timing of HGV and OGV movements will be required to manage the impact on the network during peak times and any maximum flow quota for key routes. We are yet to be presented with evidence of the efficiency of managing HGV traffic using electronic/camera based systems.

2.1.43. The park and rides will result in a reduction of commuter traffic originating from the north, south or west of the A12 on the local road network and to local villages east of the A12. However, the proposed provision of a 1,000 space car park to accommodate commuters from destinations east of the A12 will result in an increase in traffic on the local network and villages/towns east of the A12 and this will need to be assessed thoroughly and mitigation provided as necessary.

2.1.44. The report does not refer to mitigation of impacts on the B1122 from its junction with the A12 to the site entrance and then to Leiston. This was a concern raised at the Stage 1 consultation. This route should also be assessed against the sensitivity criteria discussed above to ensure the full range of possible effects are examined, as the B1122 has been identified as the primary delivery route.

2.1.45. The current mitigation measures reflect the outcome of assumptions relating to the gravity model, transport model and construction programme and delivery assumptions. There are likely to be cumulative inaccuracies within this process and sensitivity testing should be undertaken to ensure that variability in these assumptions is fully considered.

2.2. Socio-economics

Gravity model

2.2.1. As acknowledged in 6.2.31, the socio-economic environment is of a dynamic nature, underlining the need for sensitivity testing of the gravity model to different economic circumstances. This should then provide a better understanding of the likely need for/nature of appropriate triggers for contingency measures as part of the mitigation proposals.

2.2.2. The sensitivity testing should be informed by appropriate data refreshing to ensure the most up to date information will inform the application at the point of submission.

2.2.3. The ES should also explain all the assumptions used in the Gravity Model – for example around the rates of pay, length of contracts and terms and conditions that will prevail and thus contribute to the attractiveness to prospective employees. Such factors will have a significant bearing on the potential for displacement of the labour force.

Supply chain

2.2.4. The ES should set out how EDF Energy proposes to engage with the supply chain locally and increase its capacity to respond to the demands of the project. This will increase the proportion of labour sourced locally with significant socio-economic benefits. Leakage of benefits outside the area is a major concern of the local authorities.

2.2.5. The development of the Economic Strategy is welcomed, though consideration should be given to the opportunity to engage with other relevant stakeholders.

Skills/employment

2.2.6. The ES should recognise the barriers to employment faced by unemployed/under-employed people in the region. Early identification of these needs can lead to a more effective package of mitigation developed with relevant stakeholders.

2.2.7. The report uses the level of JSA claimants as a measure of unemployment but it would also be useful to recognise that the pool of people who are economically inactive, but wanting to work, is often significantly greater than the numbers who are registered as unemployment benefit claimants.

2.2.8. With reference to paragraph 6.2.35 and Table 6.2.4, whilst there will be a positive impact from direct and indirect job creation, there is a risk that this will create displacement elsewhere in the economy as the construction competes for the same local workforce and skills alongside other sectors, for example construction, manufacturing, engineering. This could make it more difficult for local companies to recruit and retain their workforce and this should be considered in the ES in the terms EN-1 requires.

2.2.9. With respect to mitigation, measures should be put in place for the operational and construction phases. For example, the skills and training strategy should aim to maximise the opportunities for local residents at all stages – in particular enabling local people to secure the long-term operational employment opportunities.

Other effects

2.2.10. Consideration should be given to a public attitudes survey aimed at understanding in particular the less tangible social effects such as local anxiety associated with a major development prior, during and following construction. EN-1 (5.12.3) identifies the potential for impacts on social cohesion. Such concerns warrant analysis and mitigation as necessary.

Accommodation provision

2.2.11. The ES needs to consider the impacts of temporary as well as permanent staff on accommodation provision in the local area during the *operational* phase of development (6.2.38). Paragraph 3.5.1 indicates approximately 1,000 additional staff would be employed during outage work, which, for each reactor, occurs for up to three months every 18 months.

2.2.12. Consideration should be given to the likely cumulative impacts where there are coincident outages on reactors, either both the Sizewell C reactors or Sizewell B, or indeed all three. While it is understood that this would not be planned – unplanned outages do occur and are indeed part of EDF's justification for being unable to rationalise some infrastructure (for example parking) across the A, B and C sites.

Tourism

2.2.13. The ES should recognise the potential for wider impacts on the tourism sector than just the take up of tourist accommodation. The spending patterns of, and use of local facilities by, incoming workers will be different to that of tourists, so that should be assessed. There will also be wider perceptions over the attractiveness of the area during the construction, and potentially operational, period which may have an impact on tourism. Equally, however, it is acknowledged that major construction programmes can be an attraction in themselves.

2.2.14. The discussion on study areas in (6.2.5) should recognise the existence of the Suffolk Coast Destination Management Organisation (DMO) area[2] as a relevant unit for the purposes of assessment. The Suffolk Coast Tourism Strategy[3] describes this area.

2.3. Terrestrial ecology & ornithology

2.3.1. The issue of definition of permanent and temporary impacts has been discussed earlier, though with particular reference to this chapter, while paragraph 7.2.29 subdivides temporary impacts in to further phases, it is not clear how that is then reflected in an assessment of the magnitude of impact (Table 7.2.6).

2.3.2. It is important that the study area reflects the actual extent of the impacts – and that includes those impacts associated with the displacement of recreational activity which may intensify activity on other SSSIs and County Wildlife Sites (Table 7.2.1). For the same reasons the Deben Estuary SPA should be included in Table 7.2.2.

2.3.3. Additionally, we have concerns that the proposed 5km study area for bats (Table 7.2.1) may be insufficient to fully understand the significance of development area for bats – this will need to be justified through further survey.

2.3.4. As indicated earlier, we have some concerns that the ES could underplay impacts on features/resources classified as being of local value (7.2.25). As National Policy Statement EN-1 states, the ES must set out clearly any effects on locally designated sites of ecological importance, and on habitats and species identified as being of importance to the conservation of biodiversity. We would expect therefore to see a thorough assessment of the impacts of the development on local Biodiversity Action Plan (BAP) priority habitats and species. Table 7.2.5 omits reference to the latter.

2.3.5. Consequently, while we welcome the commitment to making full use of the mitigation hierarchy (5.4), in order to do this a comprehensive and robust assessment

[2] www.thesuffolkcoast.co.uk – with area described

[3] Page 10 http://www.suffolkcoastandheaths.org/assets/Projects--Partnerships/BALANCE/TourismStrategy.pdf

of the impacts, including on BAP species will be required. With reference to the proposed loss of the SSSI, we suggest that the Defra biodiversity offsetting pilot metrics are applied[4].

2.3.6. In terms of impacts during construction and operation, those listed (7.2.38/39) do not explicitly identify ecological impacts associated with transport movements. The ecological consequences of the displacement of maritime activity, for example recreational sailing, should also be considered.

2.3.7. It is important that the proposed mitigation strategies across the environmental disciplines are closely aligned to ensure the mitigation proposals are complementary, for example for landscape, ecology and recreation. There will be a particular need for them to make provision for ongoing monitoring with associated trigger points for a review of the mitigation as necessary.

Errors/omissions

2.3.8. Southern Minsmere Levels CWS is incorrectly labelled on Figure 7.2.4 (Number "1" is positioned on Goose Hill which is part of Sizewell Levels and Associated Areas – listed as CWS Reference "2" in key).

2.3.9. In Table 7.2.3 Southern Minsmere Levels CWS text is incorrect as this is mainly grazing marsh - this could be due to mislabelling of this site on Fig ure7.2.4.

2.3.10. The Annex II status of Barbestelle (*Barbastella barbastellus*) should be noted in Table 7.2.4. Also missing is reference to BAP habitats and species - except for breeding birds.

2.3.11. Paragraph 7.2.11 and Fig 7.2.5 should refer to the north east corner of Sizewell Marshes.

2.3.12. Shingle habitat is missing from identified habitats in Figure 7.2.1.

2.4. Landscape & visual

2.4.1. The proposed scope of the LVIA and the methodology is broadly acceptable, though we again emphasise the need to address terminology with respect to the duration of impact as discussed above. In particular, we welcome the three pieces of work that are ongoing - that is a) a review of the landscape seascape baseline; b) ZTV and LVIA/SVIA viewpoints and c) the development of the Landscape Strategy. We also note that discussions on the 'special qualities' of the AONB[5] remain ongoing (7.3.2).

2.4.2. It is however important to clarify that at this stage, viewpoints have been agreed for the operational platform only (7.3.3) and not for the whole of the *"main development site"* as defined on Figure 3.2.1. Further viewpoints will need to be agreed for example for the rail routes taking account of the proposal to store materials adjacent to the line (3.3.3).

2.4.3. We note the recognition of the risks to the purpose of the designation of the AONB identified in EN-6, Volume 2. This statement (7.3.8) and section 7.3.49 should consequently acknowledge that the need for offsetting residual impacts is highly likely, a precedent for which exists with the Sizewell B Dry Fuel Store[6].

2.4.4. We note and welcome that landscape should be taken also as seascape as set out in EN-1 (7.3.6) and that it is recognised that there will be offshore visual receptors (7.3.17 should therefore refer to LVIA and SVIA). An LVIA and SVIA

[4] https://www.gov.uk/biodiversity-offsetting

[5] The glossary reference to AONBs should refer the reader to http://www.landscapesforlife.org.uk/

[6] http://www.suffolkcoastandheaths.org/assets/Grants--Funding/AAF/AAF-leaflet.pdf

assessment to reflect the seasonal changes, and a night time assessment in both cases, will also be needed (lighting from the Operational Service Centre is a particular concern). The ES should therefore provide an indication of the locations, height, design, sensors and luminance of all construction site floodlighting (including the jetty) and all permanent site lighting, together with details of any mitigation measures used to;

- Limit obtrusive glare to nearby residential properties including the extent of light reduction achieved,
- Minimise sky-glow.

2.4.5. Regional seascape units were used for the assessment of the Galloper wind farm, and suggest that these may also inform discussion of the seascape character of the study area.

2.4.6. The ES will need to consider seascape and visual impacts associated with shipping and rail *activity* (i.e. not just the existence of the jetty and the rail line, but the associated transport movements), respectively, during construction. The impacts of the stacks associated with the fuel store and reactor domes along with those related to the permanent beach landing facility need to be reported.

2.4.7. With reference to cumulative effects (7.3.51) Galloper Wind Farm substation *will* need to be included in this assessment. The existing Gabbard onshore infrastructure forms part of the baseline.

2.5. Amenity & recreation

2.5.1. The ES should present a fuller understanding of the likely impacts on recreational activity as a consequence of the development than the Scoping Report suggests. In particular, there needs to be a better appreciation of impacts of the incoming construction workers associated with the campus and, furthermore, the indirect effects arising from changing habits of existing recreational users in response to the development.

2.5.2. While it is understood that high quality leisure facilities would be provided within the campus accommodation, with up to 3,000 bed spaces, some workers will undoubtedly make use of the high quality environment during their residency at the campus.

2.5.3. While the Scoping Report touches on deflection (7.4.22), the study area of 2km (7.4.12) does not have a clear logic and will not be sufficient to address this – it does not even include the entirety of the blue rail route – omission of Aldeburgh/Thorpeness is also particularly noticeable.

2.5.4. The ES will need to present a thorough understanding of how people are using the area at the moment and how those habits are likely to change during the construction and operational phases of development.

2.5.5. In particular, it needs to examine where people may be deflected to and the sensitivity of those sites to increased recreational pressure – for example increased dog walking on SSSIs. It will also need to look at how workers, both in the construction and operational phases may access the site using the rights of way network and how this access may be affected and enhanced to offset this. For example, Bridleway 19 is currently used by commuting workers as well as for recreation. Its temporary closure could deflect cyclists on to busier roads (or indeed participation in cycling/walking may decrease) so this will need to be assessed and mitigated for to ensure a similar standard of recreational opportunities remain available during and post-construction. The findings of this work should also inform the HIA.

2.5.6. These are key construction impacts that are not adequately captured (7.4.35). It should also be recognised any changes to patterns of recreational use could have wider economic consequences, given that high quality recreational opportunities are a significant driver of the local tourist economy (with trails promoted nationally). So, with displacement of recreation is potentially displacement of income. The surveys planned (7.4.16), in addition to capturing quantitative and qualitative data on the use of publics rights of way, should attempt to capture information on local spending. Additionally, there may be actual physical damage to rights of way including that caused direct by the construction work itself and by possible increased level of use by construction workers.

2.5.7. The ES should assess impacts on open access land – this is omitted from further baseline research (7.4.18) and as a possible impact of the development (7.4.35). Paragraph 7.4.13 should also refer to *restricted* byways in its description of a right of way, and carriage driving should be included within list of extra rights. Figure 7.4.1 also has a number of errors that need to be addressed - Roads Used As Public Paths should be shown as Restricted Byways, for example.

2.5.8. In terms of mitigation (7.4.40), it is especially important that long distance routes are kept open during the construction phase. We would also suggest that, in line with the EN-1, the ES should set out opportunities to enhance green infrastructure in the locality by, for example, creating new public access, be it a right of way or open access land, having regard to other constraints, such as ecology.

2.5.9. Re-establishment of rights of way should be to a level commensurate with expected increased use – for example by staff accessing the site during operation.

2.6. Terrestrial historic environment

2.6.1. The impact on Leiston Conservation will need to be assessed – Sizewell B is clearly visible from within and adjacent to it (7.5.20).

2.6.2. It should be noted that English Heritage has now listed at Grade II several WWI, WWII and Cold War military structures at Orford Ness (7.5.22).

2.6.3. An assessment in association with Conservation Officers is welcome, though should include non-designated heritage assets in addition to designated ones (7.5.26).

2.6.4. Table 7.5.1 relies heavily on criteria drawn from the DMRB and its appropriateness beyond road schemes is questionable – reference should be made to English Heritage's Conservation Principles and the new British Standard. In respect of paragraph 7.5.29, reference to '*Standards for Field Archaeology in the East of England* '(Gurney 2003, East Anglian Archaeology Occasional Paper 14)[7] and the Suffolk County Council Archaeology Service Conservation Team documents '*Requirements for Trenched Archaeological Evaluation 2012 Ver 1.3' and 'Requirements for Archaeological Excavation 2012 Ver 1.1*'[8] should also be made

2.6.5. While Table 7.5.1 refers to historic buildings (which clearly could include non-designated as well as designated heritage assets) and historic landscapes, Table 7.5.2 refers exclusively to impacts on designated heritage assets. As mentioned above, non-designated heritage assets should not be excluded from an assessment of the magnitude of change and should therefore be reflected in paragraphs 7.5.45/47/52/53.

2.6.6. The proposed terminology used in assessing significance (7.5.39) could usefully reflect that used in the Section 12 of the NPPF, i.e. 'substantial' and 'less

[7] http://www.eaareports.org.uk/Regional%20Standards.pdf
[8] http://www.suffolk.gov.uk/libraries-and-culture/culture-and-heritage/archaeology/

than substantial'. These are the tests that are applied on a daily basis to heritage assets and are terms in widespread use. 'Less than substantial' could be graded into differing kinds of effects that are not substantial. It is noted that there is some mapping of terms in the Ecology section (Table 7.2.8) to maintain consistency with industry-standard terminology and this could equally be applied here.

2.6.7. In addition to the assessment of inter-relationships and cumulative effects, which is welcome, it may be that individual heritage assessments are required to be undertaken of those designated heritage assets of the greatest importance (and, therefore, sensitivity) within the Historic Environment Study Area - such as Scheduled Monuments and Grade I and Grade II* listed buildings, in order that impacts arising from the proposal can be most fully understood.

2.7. Marine historic environment

2.7.1. No comment

2.8. Noise and vibration

Traffic – related impacts

2.8.1. It is important that the Noise & vibration and Air Quality Assessments are based on the information contained within the Transport Assessment (TA). Data in the TA should therefore be presented in the format that it will be used in the noise and air quality assessments for example 18 hour, 8 hour, hourly, 24 hourly flows, together with proportions of heavy goods vehicles and average speeds to allow transparency and cross checking.

2.8.2. The noise level monitoring locations look to be comprehensive, though consideration should be given to the need for additional points on routes likely to be used by construction workers, such as the A1120. Any short term monitoring of road traffic noise should be carried out strictly in accordance with the "Shortened measurement procedure" as set down in the Calculation of Road Traffic Noise methodology, and be carried out over a full three hour period within the stated hours and not over shorter snapshot periods.

2.8.3. It is acknowledged that road traffic noise monitoring is useful for any noise model calibration and verification work, but that noise level changes during the construction period and once the site becomes operational would be established by calculation and direct comparison of the relevant scenarios.

2.8.4. The number of noise sensitive properties affected in each scenario should be included, so that the overall impact and scale of effects can be assessed. Rather than following the Design Manual for Roads and Bridges to the letter, which may result in the worst affected façade subject to change being counted which is not always the façade facing and closest to the route, the ES should provide a simple assessment of noise level changes for the façade that is closest to the route to allow residents the opportunity of gauging the potential direct effect.

2.8.5. Inclusion of a preliminary programme of construction activities and plant use, to identify impacts and variability throughout the construction period, would clarify impacts. Also, whether night-time traffic movements would be necessary, either for workers or construction vehicles, and any shift working and changeover times, if significant.

2.8.6. It is noted that the currently proposed length of the construction period is estimated to be seven to nine years (plus time for site preparation). The definition of "long term" and criteria for the assessment of magnitude should follow recommendations in the most up to date versions of BS5228 with respect to noise and also vibration, and any other relevant documents. As mentioned earlier, the ES

should generally maintain consistency in the definition of terms (temporary, long, medium short et cetera) unless there is a clear reason to depart from this.

2.8.7. It is noted that the NPPF and specifically the associated Guidance relating to Noise is not referred to and the validity of Table 7.7.3 is queried. Also, whether separate assessment of magnitude criteria should be applied to road traffic noise increases on the construction traffic routes, in accordance with the guidance for short term impacts contained in DMRB. The content of Table 7.7.5 is agreed.

2.8.8. The NPPF Guidance[9] refers to the Noise Policy Statement for England (NPSE), which includes the types of noise which are within its scope, which include:

- "environmental noise" which includes noise from transportation sources; .....
- "neighbourhood noise" which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street."

2.8.9. Consideration should be given to the appropriateness of referring to this Guidance (given its status in the NSIP regime) and the description of "Effect Levels" within the assessment. As mentioned above, it is noted that there is some mapping of terms in the Ecology section (Table 7.2.8) to maintain consistency with industry-standard terminology and this could equally be applied here.

2.8.10. The assessment of vibration from road traffic is welcomed. In accordance with guidance, cumulative effects are to be addressed, which is also welcomed.

2.8.11. Generally, the proposed methodologies are acceptable, however, since drafting of the Scoping Report, BS5228 has been updated to BS5228-1:2009+A1:2014 and as mentioned previously, the most up to date guidance available at time of assessment should be used. Furthermore, we note that where professional judgement is relied upon (7.7.9), this should be in the form of evidence-based judgements, rather than reasoning alone.

2.8.12. With respect to road traffic noise impacts, an indication of whether any dwellings adjacent to new or altered lengths of carriageway and also the construction traffic routes would qualify for noise insulation under the Noise Insulation Regulations 1975(as amended), with appropriate explanations, should be included. Any other mitigation measures or mitigation schemes identified for further consideration should be outlined.

2.8.13. With respect to the effects of noise and vibration on people and wildlife, the evidence of different noise levels on human physical and mental health, both of acute and chronic noise exposure has a robust evidence base. This potentially includes comparative studies with non-human species exposed to different noise levels. For example there is a large evidence base on the physiological and behavioural effects of different noise exposure levels on rodents (7.7.15).

Construction-related impacts

2.8.14. The 33 measurement locations and measurement protocol described in the Scoping Report has been agreed with the Environmental Protection Team at Suffolk Coastal District Council. The ES should present the noise monitoring data together with an assessment of magnitude of impact and sensitivity of receptor.

[9] http://planningguidance.planningportal.gov.uk/blog/guidance/noise/noise-guidance/

2.8.15. Where noise or vibration from site construction working is anticipated to have adverse effects on occupiers of nearby residential properties, based on the prevailing background noise levels, utilising BS:5228:09 and BS:4142:90; the ES should detail all such construction and demolition works (for example diggers, excavators, piling, riveters, mixers, explosives, pneumatic breakers, drills, dewatering pumps, boring equipment, compressors, generators etc.) and indicate the mitigation measures to be taken either;

- At source,
- By way of barrier or shielding,
- Any other form of mitigation.

2.8.16. The ES should also detail the degree of noise reduction likely to be achieved by the mitigation measures by way of comparison with the existing background and ambient noise levels, measured as part of the scoping process. Methods of noise or vibration attenuation should be specified for each specific construction activity so as to achieve 'Best Environmental Practice' within the ES. Any other acoustic or vibration data in respect of confined tones or low frequency noise propagation should also be made available within the ES.

2.8.17. All site transportation movements or essential construction works (e.g. dewatering, dredging, marine landing operations etc.) which may be adversely affect nearby noise sensitive properties during the evening or at night should be particularly highlighted as these may cause sleep loss. Mitigation will be particularly important in these circumstances.

2.8.18. It is noted and agreed that BS:8233 will be used as design criteria for the new campus accommodation.

Noise & vibration – operational impacts

2.8.19. Projected levels for general site noise from the newly constructed Sizewell C power station should be calculated and represented as a $L_{Aeq\ (1hour)}$ value during daytime hours and $L_{Aeq\ (5\ minute)}$ value during night time hours at all nearby noise sensitive properties. If noise from the site is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation should be specified to achieve 'Best Environmental Practice'.

2.8.20. Projected noise levels for grid reconnections following reactor trips and outages shall be calculated and represented as a $L_{Aeq\ (5\ minute)}$ value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitations on reconnection should be specified to achieve 'Best Environmental Practice'.

2.8.21. Projected noise levels for the proposed 'Stand-by Diesel Generators' shall be calculated and represented as a $L_{Aeq(5\ minute)}$ value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitation's on testing times should be specified to achieve 'Best Environmental Practice'.

2.8.22. A proposed 'Complaints Procedure' detailing who will undertake investigations of noise complaints on behalf of the site operators and the scope of amelioration in the event that complaints are justified should be provided.

2.9. Air quality

Traffic-related impacts

2.9.1. No reference has been made to the National Planning Practice Guidance relating to Air Quality. Consideration should be given as to whether this is relevant.

2.9.2. The air quality monitoring regime is acceptable. The Scoping Report advises that Suffolk Coastal District Council is in the process of consulting with the Department of Environment, Food and Rural affairs (DEFRA) on the need to declare an Air Quality Management Area (AQMA) in Stratford St Andrew (7.8.12). DEFRA has now confirmed the need for an AQMA to be declared at this location and, following a Public Consultation currently underway, the AQMA Order will be made in June 2014.

2.9.3. Impacts at locations such as Yoxford, and along the B1122, such as Theberton and Middleton Moor where there are a relatively high number of properties in a rural location, should be specifically quantified. Numbers of properties affected should be included, as well as timescales and durations, which would be relevant to the National Objective Limit levels for the significant pollutants (including nitrogen dioxide and particulate matter (PM_{10}), as set out in the Local Air Quality Management Regime'). The road traffic assessment pollutants of nitrogen dioxide and particulate matter are agreed.

2.9.4. It is noted that traffic datasets derived from the Transport Assessment will be used.

2.9.5. The most up to date guidance available at the time of assessment should be used. A number of the relevant documents are under review at the present time. Reference could be made to the Suffolk Local Authorities Air Quality Management and New Development 2011 Planning Guidance[10].

Construction – related impacts

2.9.6. The ES should detail all potential construction site operations which may give rise to atmospheric concentrations of particulate matter (PM_{10}) or dust (e.g. excavation, demolition, use of explosives, movement of vehicles, loading operations, stockpiling of soil and rubble, crushing of material etc.). These should be specified together with the point source location and the particular methods of dust suppression to be used for each specific activity. The study area described in 7.8.19 should reflect that dust emissions may arise from transport modes other than road – i.e. by rail too and these may arise further than 500m from the site entrance.

2.9.7. The predicted concentrations of particulate matter (PM_{10}) and dust for each receptor should be formatted for comparison with the Local Air Quality Management Regime and the objectives included in the Air Quality (England) Regulations 2000 and Air Quality (England) Amendment Regulations 2002. The methodology as laid out in the Scoping Report for evaluating the magnitude and significance of air quality effects from construction is agreed.

2.9.8. If any of the above Air Quality Standards or Objectives is predicted to be exceeded by the above mentioned activities, further assessment will be required. This may include monitoring at relevant receptor locations, detailed computer modelling and investigations of solutions to reduce pollutant concentrations.

Operational impact

[10] http://www.suffolk.gov.uk/business/planning-and-design-advice/supplementary-guidance-air-quality-management-and-new-development-2011/

2.9.9. The ES should detail the atmospheric concentration of the seven pollutants included in the 'Local Air Quality Management Regime' namely; carbon monoxide; nitrogen dioxide; benzene; 1,3-butadiene; Lead; sulphur dioxide; and particulate matter (PM_{10}) which arise from site related Combustion Processes including stand-by equipment. These pollutants shall be predicted at the nearest relevant receptor locations. The predicted concentrations for each receptor shall be formatted for comparison with the objectives included in the Air Quality (England) Regulations 2000 and Air Quality (England) Amendment Regulations 2002. Again, Sizewell Beach should be included as a relevant receptor location for the pollutant objectives with averaging times of 15 minutes and 1 hour.

2.9.10. Predictions should also include the combined emissions arising from Sizewell B and C power stations at the nearest relevant receptor locations. It is important to also include emissions from standby equipment. The methodology for evaluating the magnitude and significance of air quality effects from site operation as laid out in the Scoping Report is also agreed.

2.9.11. Full details shall be submitted regarding the type, location, chimney height requirements and emissions from the Standby Diesel Generators. If any of the above Air Quality Standards or Objectives are predicted to be exceeded by the site related Combustion Processes, including stand-by equipment, further assessment will be required. This may include monitoring at relevant receptor locations, detailed computer modelling and investigations of solutions to reduce pollutant concentrations.

2.10. Soils & agriculture

2.10.1. Reference is made to returning land to agriculture (7.9.33); we would prefer, as part of the 'Estate Vision' to see the whole of the estate returned to semi-natural habitats with gradation of public access south to north.

2.11. Geology & land quality

2.11.1. A site survey including samples from 150 locations across the Sizewell C site has been undertaken for the presence of Contaminated Material. This survey has not indicated any significant forms of contamination and as such the site remains in a low to very low category of potential risk for contamination. Additional sampling will need to be undertaken during site excavation and any identified contamination will need to be safely removed or encapsulation on site. The assumption that there is no anthropogenic contamination beyond the normal application of fertilisers and pesticides should however be validated (7.10.24).

2.11.2. Details of any material (e.g. soil, peat, contaminated material *et cetera*) removed from site for disposal purposes or safely encapsulated on site shall be notified to both the Environmental Protection Team at Suffolk Coastal District Council and the Environment Agency. Validation shall be required following this remediation action to indicate the site is suitable for its new specified use.

2.11.3. Detailed evidence in the form of certification to 'CLEA standard' will need to be supplied to indicate the source and suitability of all imported material used on site.

2.11.4. With reference to the samples undertaken (7.10.5/13) it is not clear for which radionuclides they were tested or against what they were compared.

2.12. Ground water

2.12.1. The ES should identify the magnitude and any potential impact on hydraulic continuity caused by: dewatering, coffer dam construction, spoil heap/stockpile leachate, runoff or infiltration, which may adversely affect private water supply quality in the area, and specify proposed measures to protect the aquifer source.

2.12.2. We are particularly concerned that the potential impacts of the construction of the bridges and their ongoing impact on groundwater processes are assessed and managed.

2.12.3. Groundwater monitoring (including for radiochemicals) should be included within the mitigation plan and this should cover flows outside the cut-off wall in the SSSI. There should not be a complete reliance on modelling – this will need to be ground-truthed (7.11.40).

2.13. Surface water

2.13.1. With reference to Table 7.12.3, we suggest that watercourses in, and feeding into/adjacent to, protected sites should be assigned as being of high value.

2.13.2. During construction the cut off wall adjacent to Sizewell drain could impact on surface water hydrology.

2.13.3. As with groundwater, the ES should include provision for monitoring, during and post construction, which links to appropriate mitigation as necessary (7.12.38).

2.13.4. The ES should assess all temporary (for example for the campus) and permanent foul water drainage arrangements, with any sea water disposal discharge designed to;

- Minimise any harmful effect on sea life diversity,
- Control temperature and turbidity which may encourage algae blooms.

2.14. Coastal geomorphology and hydrodynamics

2.14.1. It is important that the study area is clearly defined – which is not the case in Figure 7.13.1. The study area must include the potential impact of interrupted 'natural' sediment flow on the coastline from the Blyth Estuary to at least Orford Ness. However, if the observed net sediment transfer is southwards (7.13.3), the southern boundary of the Telemac study needs to be moved further south to include Shingle Street to correct the current northern bias.

2.14.2. The ES should recognise that during the lifetime of the Sizewell C project rates of erosion could be significantly different to the current era. 7.13.6 notes that there has been high periods of erosion in the past but since 1925 it has been relatively low. However, 1925 is just 90 years ago and this development will last more than 100 years into the future and therefore the implication that erosion will stay low may be misleading. In this context, full consideration should be given to the predicted impacts of climate change including the potential for acidification / chemical change to the sea over the coming decades and its impact on the protective crag rock that the site depends upon for its protection.

2.14.3. The ES should ensure that it considers the impacts arising on a worst-case basis – for example, while the jetty is described as temporary, the ES should ensure that it assesses its maximum possible lifespan.

2.14.4. In the Marine Ecology section outfall structures are identified as potentially affecting sediment transport (7.15.32). This is not recognised in the corresponding section of the Coastal Geomorphology chapter.

2.14.5. As detailed in other sections of this report, we have concerns with the guidelines to be used to determine descriptions of magnitude, particularly so given the predominantly soft nature of the Suffolk coastline. In these circumstances impacts of the development may well be quite localised within the study area, but nonetheless have very material consequences if those impacts affect property frontages. Table 7.13 is constructed in such a way that, for example an effect of a ten year duration, affecting half the study area would be described as low magnitude.

2.14.6. With respect to assumptions and limitations (7.13.21), the ES should acknowledge that the baseline scenario and also the potential impacts of the new build and operation of the site will be difficult to predict with high confidence and so a range of potential outcomes need to be forecast and which will require ongoing monitoring to review and respond to in either a proactive or reactive fashion. The monitoring plan and associated interpretation / response liabilities are a critical issue for the local authorities.

2.14.7. The section on mitigation (7.13.27) should acknowledge the potential for the need for the protection of the Sizewell C site (possibly A and B sites too) prior to full / final removal, requiring interventions that disrupt 'natural' sediment movement across the frontage, which produces a negative impact on adjacent shorelines i.e. Thorpeness, Aldeburgh, Orford and (less likely) Minsmere and Dunwich. These impacts may cause significant effects and require mitigation, albeit decades hence. The ES should recognise this and create a process under which this risk is assessed and appropriate mitigation planned and delivered.

2.14.8. It is absolutely critical that the ES sets out how the impacts of the development will be monitored for the lifetime of the development and how that monitoring will inform any remedial action required.

2.15. Marine water quality and sediments

2.15.1. The ES should clarify which radionuclides have been measured (7.14.17). Furthermore, evidence has shown that radionuclides, through the process of adsorption, will concentrate in fine sediment area, for example in mud flats and salt marshes. Therefore, in terms of sediment analysis, further studies should be undertaken within the Alde and Ore estuary to establish the monitoring baseline on contaminate build-up.

2.16. Marine ecology

2.16.1. Underwater vibration should be identified as a potential impact (7.15.25), the mitigation for which should include monitoring.

2.16.2. It is reported that Sizewell B 'impinged' Sprat, herring band whiting 'in large numbers'; it is not clear how this would score against the degrees of magnitude in 7.15.16. The ES should report on the cumulative impacts on commercial fisheries through direct fish mortality and through loss of fishing grounds associated with Sizewell B, C (including jetty/outfall construction) and laying of offshore wind farm cables (and/or placement of turbines) for both Galloper and other windfarms within recognised commercial fishing areas.

2.16.3. Consideration should be given to aligning this study area with that related to the HRA process – as mentioned above the interrelationship between the EIA and HRA process should be clear.

2.17. Navigation

2.17.1. The ES should assess the potential for ecological effects to arise from rerouting of shipping traffic (7.16.22).

2.17.2. Recognition should be made of the opportunities on the Alde-Ore estuary (7.16.9).

2.18. Radiological

2.18.1. The ES should assess the need for monitoring (during appropriate conditions) of airborne radiological pollution through either aerosol (very fine spray) or sea spray dispersal – reference should be made to the research undertaken at North Uist.

2.18.2. The Scoping Report does not specifically rule out the future use of Mixed Oxide Fuels (MOX) at Sizewell C. The ES should either rule out the use of MOX fuel or comment on the radiological significance and justification for this fuel if it is intended to be used.

2.18.3. The ES should identify and compare baseline/existing terrestrial and marine radiological data with any projected data for the new Sizewell C site.

2.18.4. Detailed information should be provided as to the integrity of all radioactive material storage and any radioactive waste packaging facility on site. This should include comments on the suitability of storage over the proposed 'lifetime' of the site.

2.18.5. Any intended off-site storage of radioactive waste, whether interim or permanent, should be detailed in full, including location and capacity, together with the radiological significance and justification for storing this type of fuel off-site.

2.18.6. The issues surrounding the utilisation Sizewell C for the storing of radioactive waste derived from other sources, together with any impact of increased radioactive discharges that may arise in such circumstances, should be considered within the ES.

2.18.7. We would ask PINS to confirm through which process would the potential environmental effects of an incident involving radioactive material be assessed - for example impacts on ground water/surface water features should emergency cooling be required. The Scoping Report gives little attention to the potential environmental implications associated with the storage of spent fuel (section 3.8).

2.19. EMFs

2.19.1. The ES should identify any pylon or overhead power-line/cabling alterations to be undertaken in connection with this development, together with any likely increases of the Electro-magnetic radiation fields, which may adversely affect occupiers of nearby residential properties.

2.20. Health and Safety

2.20.1. The ES should detail a health and safety risk analysis for site workers and any members of the public which may be adversely affected by the constructional phase of the works. A further health and safety risk assessment should be provided to cover public safety for all access along the shore line and public areas surrounding the site once Sizewell C is operational.

2.21. Conventional waste

2.21.1. The ES should detail all non-radioactive wastes stored or disposed of on site, identifying and categorising material so as to indicate 'Best Environmental Practice' is being taken, for example storing fuel oil stored in double-bunded tanks etc.

3. ASSOCIATED DEVELOPMENT

3.1. For all sites:

3.1.1. the **amenity and recreation** studies should gather information on the extent to which local roads are used by all non-motorised users, particularly pedestrians. Generally, it should be noted that mitigation could also be achieved by *enhancing* local non-motorised access.

3.1.2. **Ecological studies** should have regard to Biodiversity habitats and species. The study area for bats in particular will need to be agreed.

3.1.3. Viewpoints will need to be agreed for the **LVIA**. Mitigation for landscape and visual effects should include advance planting and/or 'instant' hedging – else

mitigation is not likely to be effective during the lifetime of the associated development.

3.1.4. It is agreed that **noise and vibration** impacts should be assessed using the same methodologies as discussed above. Care however needs to be taken with the description of potential mitigation measures – there is reference in Tables 8.3 and 8.6 to "screening or planting" for noise and vibration mitigation. Planting would not necessarily provide adequate noise mitigation unless very dense and further explanation of this would be helpful.

3.1.5. environmental impacts on nearby residential properties (e.g. construction works, noise, dust, lighting, foul drainage etc) should be assessed and mitigation measures provided where necessary.

3.1.6. An Air Quality Assessment and calculated Traffic Predictions should be provided within the ES for the chosen park and ride sites and should any of the Air Quality Objectives (AQO) be predicted to be exceeded, then mitigation measures should be recommended.

3.2. Northern Park and Ride

3.2.1. The access details will need to be agreed with the Highways Authority. A solution is required to provide a layby area for long vehicles to pull in once they have crossed the East Suffolk railway line. There have been discussions with Network Rail but no proposals have been presented to date.

3.2.2. The impact of the new car park to the south of the rail station will need to be considered in any assessment.

3.3. Southern Park & Ride

3.3.1. The access details will need to be agreed with the Highways Authority. There are concerns about the safe egress of traffic from the existing slip road onto the A12 which will need to be assessed and appropriate mitigation proposed

3.3.2. In view of the likely need to close the existing bridleway through the site, local rights of way enhancements are particularly important for this site.

3.3.3. Reference is made to potential ecological impacts on the River Deben – this will need to be picked up through the HRA process.

3.4. Rail Line Extension

3.4.1. The proposed new rail routes into the site cross a number of Public Rights of Way. There appears to be an assumption within the report that these routes will be closed or diverted. Although this may be considered for temporary works, more sustainable mitigation will be required for the proposed construction period. Mitigation should include the potential for grade separation or combining with safe and convenient road crossings (Table 8.9).

3.4.2. Further information will be needed with respect to the impact of the proposed rail routes on the existing highway network, especially with respect to any proposals for new rail crossings.

3.4.3. The amenity and recreation study assess the use of open access sites in the area that may be affected.

3.4.4. The selection of viewpoints will need to have regard to the potential for soil storage alongside the rail line. Mitigation should therefore consider a means of minimising this storage.

3.4.5. Noise disturbance from unloading of materials may be a source of concern should the potential option of a terminal north of King George's Avenue, Leiston be used at unsociable hours.

3.5. A12 Improvement – Farnham Bend

3.5.1. The options presented in the report will need to be assessed in line with Section 6.3 of the report together with the additional assessment criteria identified in this response.

3.5.2. The options presented in the report remain as presented in the Stage 1 Consultation. Based on the evidence presented to date, these are not considered likely to be sufficiently extensive or acceptable and the local authorities maintain their support for a bypass of the four A12 villages of Marlesford, Little Glemham, Stratford St Andrew and Farnham. The ES will need to ensure that adequate mitigation is provided to address impacts arising in all of these locations.

3.5.3. The ES will need to assess the construction method and layout including timing of works and piling for example. Consideration should be given to noise and dust from construction works and noise from the new road layout. Mitigation measures such as screening, quiet road surfacing, speed limits that can reduce these impacts on local residents should be discussed within the ES. Air Quality modelling should also be included for this purpose and should any of the Air Quality Objectives (AQO) be predicted to be exceeded, then mitigation measures should be recommended.

3.5.4. Similar assessments would likely be needed for any other highway improvements.

3.6. Visitor Centre

3.6.1. The ES will need to detail at what point the Visitor Centre will be constructed and then become operational –cumulative impacts will arise with the other associated development sites as well as the main site development. It is likely that this facility will attract more pedestrians and cyclists to the area and sufficient mitigation will be required to accommodate this increase in vulnerable road users.

We trust that these comments are useful. If they require further clarification, please do not hesitate to contact us on the details above.

Yours sincerely

[redacted]

Michael Wilks
Planning Projects Manager
Suffolk County Council

[redacted]

Philip Ridley
Head of Planning & Coastal Management
Suffolk Coastal District Council

Leiston-cum-Sizewell Town Council

John Rayner, Town Clerk
Council Offices, Main Street, Leiston, Suffolk, IP16 4ER
Tel: 01728 830388
townclerk@leistontowncouncil.gov.uk

Our Ref:

sizewellc@planninginspectorate.gov.uk

FAO Gail Boyle

Date: 10 June 2019

Dear Gail

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

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

Leiston-cum-Sizewell Town Council have noted the Scoping Report and we think the following information should be included and addressed in the ES. These points are consistent with our response to the Stage 3 consultation which accompanies this letter for any clarification.

The main items to include please are;

- The actual impact on the SSSI and the foreshore of the nuclear platform itself. This should be reflective of the increased size and encroachment that the platform may make on its surrounds to accommodate the two reactors as this is still unclear.
- The full impact on the coastal path throughout construction and a mitigation strategy to ensure it stays open throughout.
- The LVIA (6.6.5) should concentrate and accurately illustrate the increased incursion onto the foreshore from the enlarged site and extended sea defences. The LVIA should clearly show and illustrate how much further forward of SZB the proposed construction (and the site boundary) will come.
- That **Leiston Town Centre** (by traffic lights) be scoped into the EIA for air quality
- That the LEEIE be scoped into the EIA for air quality
- That **Leiston Town Centre** be scoped into the EIA for traffic – this should include baselines, expected increase in use of the town centre for SZC and also SZB workers during construction. Effects on traffic delays in Cross Street and Sizewell Road should be extrapolated from the predictions. There will be significant traffic bleed from major routes. It should also address mitigation for this.
- That **Abbey Lane** be included in the EIA for traffic. Again, baseline, SZC traffic, SZB traffic and freight. It should also address mitigation for this.
- The impact on traffic of the level crossings around Leiston.

- That **King George Avenue** be included in a traffic and air quality EIA under the LEEIE section as it is still unclear what the effects will be on this important route through town and what the proposed mitigations are.
- The impact and implications for safety on Valley Road east (Kemps Hill) from the pedestrian traffic expected from LEEIE (caravan park)
- The impact on useage and road safety from increased traffic on Lovers Lane around the Household waste site and a strategy and mitigation to ensure it stays fully functional and accessible throughout construction.
- That an effort be made to produce a document for local people that is half way between the EIA and the non-technical summary to accompany the DCO.
- That a clear and understandable reason be given for not allowing continued access to the beach from Kenton Hills under the bridge between the platform and Goose Hill. (In the form of an impact assessment of retaining a pedestrian thoroughfare perhaps)
- Clear work on quantity, use and supply of potable water.

Yours sincerely

John Rayner
Town Clerk

Attachement;

Representations made by Leiston-cum-Sizewell Town Council to the Sizewell C Stage 3 Pre-application consultation (where requests were made for details to be scoped for the DCO).

SIZEWELL C STAGE 3 PRE-APPLICATION CONSULTATION

Representations from Leiston-cum-Sizewell Town Council

SUMMARY

The impact on local residents, the specific impact on the town centre and the wider impacts from the additional traffic remain the primary concerns of Leiston-cum-Sizewell Town Council and their residents. Almost 90% of the construction will take place in this parish.

The current Stage 3 consultation has better detail than Stage 2 in many areas and has allowed Councillors and residents to get a better feel for the sheer size of the project and form better impressions on just what the impacts might be. This has heightened concerns in some areas, particularly around the size of the platform, and these are detailed below.

Whilst welcoming many of the socio-economic benefits that a major infrastructure will bring the main issues detailed below concentrate on the undoubted disruption and inconvenience the town and surrounding area will experience throughout the lengthy construction phase and also raises topics where mitigation and compensatory measures could be included in EDF Energy's future plans.

Councillors would like to thank EDF Energy for the better timing of this consultation, the wide distribution of documentation and the willingness to meet and discuss issues with groups and parishes when requested.

1.0 INTRODUCTION

1.1 These representations are made on behalf of Leiston-cum-Sizewell Town Council.

1.2 They represent the views of the elected members of Leiston-cum-Sizewell Town Council. This response was formally endorsed by the Town Council at its meeting on 19 March 2019. Their views took into account various representations and submissions made to them by residents over the course of the consultation.

1.3 This response is structured as follows:

- Section 2 - Addresses the overall principle of Sizewell C.
- Section 3 - Provides some local context to the area and sets out the principal concerns of Leiston-cum-Sizewell Town Council.
- Section 4 - Highlights the key negative impacts to beach access, natural and heritage assets.
- Section 5 - Identifies key socio-economic impacts of Sizewell C to the Leiston-cum-Sizewell.
- Section 6 - Presents mitigation measures to help alleviate negative impacts and secure positive impacts not covered in in Section 4 and 5
- Section 7 - Identifies transport impacts and required mitigation measures.
- Section 8 - Provides a response to the different options presented in the Stage 3 consultation material.
- Section 9 – Identifies the considerable challenges of the first stages of construction
- Section 10 - Lists additional evidence required to support the Sizewell C proposals and work that needs to be done with other stakeholders.
- Section 11 and 12 – Consultation and Conclusion

Appendix A – for purpose of clarity this provides a list of and rationale for all requested improvements to community infrastructure and amenity.

Appendix B –covers the mitigation and compensation required specifically for Leiston Town Centre.

2.0 NATIONAL ENERGY STATEMENT

2.1 It is the understanding of Leiston-cum-Sizewell Town Council that, under the Government's National Policy Statement for Nuclear Power Generation (EN-6) and the recent consultation for revision of this policy (for post 2025), Sizewell remains a nominated site for a reactor. The finalised strategic site criteria in the new consultation remains the same however when relating to the size of the site nominated. It also still gives the nominator an element of flexibility on the size once detailed plans are drawn up. The extant EN6 gives leeway on flooding issues and Habitat Regulations via a mechanism called Imperative Reasons of Overriding Public Interest (IROPI). This was to meet the Government's objective to maintain or enhance levels of energy security that they felt held a certain urgency back in 2011. A lot has changed since then and the upsurge of wind power in particular has lessened the urgency and, in our opinion, the need for potential adverse effects on the integrity of the European Sites which cannot be effectively avoided or mitigated to achieve the Governments aim in this document. Importantly, Sizewell is the only site nominated in an Area of Outstanding Natural Beauty.

2.2 It is the flexibility of site size that has caused the most concern though as, the plans for two reactors on the site (for economy of scale) has pushed the EN6 site boundaries out too far and has raised serious concerns about how the site will now impinge on the local environment and, more importantly, resident's amenity in the future.

2.3 It is acknowledged that Government is the key driver in how many of the 8 sites from EN6 are actually needed. They will be influenced of course by the timescales for delivery, and this will feature heavily in the selection process.

2.4 Even bearing in mind the strategic nature of these decisions it is understood that Sizewell C will be considered on its own merits by an independent Planning Inspectorate who will pass on their recommendation to the Secretary of State to make the final decision on the site's suitability. Not it's necessity.

2.5 This does not mean therefore that Sizewell C will automatically be granted a Development Consent order.

2.6 There is also still the fundamental concern of locating so much of the country's power supply in one area. This is exacerbated by National Grid currently allocating enormous capacity on the same line to various other major infrastructure projects from the wind sector. Loss of transmission on this one line could lead to major grid instability.

2.7 With this in mind, Leiston-cum-Sizewell Town Council still have serious ecological and practical concerns for siting two more reactors in an AONB (and SSSI) and would insist that the issues set out in these representations are fully addressed and mitigated for should the Secretary of State subsequently consider this site to be suitable. It is assumed that the ONR will be providing a clear statement on whether

they are content that the site is large enough to support two reactors and the ancillary equipment along with waste storage. We commented in Stage 2 that the illustrative maps did not appear to leave much leeway for any additional buildings that may have become necessary and this has been proved pertinent as the size of the site has now increased. Sizewell B is having to relocate facilities and there are unsightly and unwanted pylons now being proposed on the site too due to the restricted footprint. Members are seriously concerned that the new land take, predicted in our Stage 2 response, will have a huge detrimental effect on the surrounding designated areas, especially the coastal path. In our opinion this site is too small for the proposed project. Members would therefore like assurance from ONR and EDF Energy that this has been considered and from the Planning Inspectorate, in due course, that this extra incursion and impact on the surrounding designated sites is acceptable.

2.8 There is also concern about a possible displaced flood risk from the strengthening and easterly movement of the sea defenses plus the unknown impact of the Beach Landing Facility and its access road on coastal processes.

3.0 LOCATION OF LEISTON AND SIZEWELL

3.1 Leiston is a small market town that is adjoined by the hamlet of Sizewell, with a collective population of around 6,000. It is located on the coast between Lowestoft and Felixstowe. Leiston is served by a variety of shops, public houses, cafes, and restaurants. It also has its own recognised football club in the Football League, a leisure centre, a Film Theatre and is home to the world renowned Long Shop Museum. It also adjoins the internationally famous RSBP Minsmere bird reserve and is home to Leiston Abbey.

3.2 The proximity to the coast and its position in the centre of the AONB means that residents and visitors to Leiston and Sizewell enjoy excellent access to the amenities offered by having the coastline on their doorstep and country walks all around the parish. This includes good access to the beach for recreation including walking, dog walking, and swimming. The Park Run along the frontage of the Power Stations to Minsmere is also very popular and a big benefit to resident's health and wellbeing.

3.3 Leiston has an established Neighbourhood Plan, with vision, and this document should be used by EDF Energy to assess the efficacy of supporting the town and entering into partnership with the town to work on the bigger projects with them as its major employer and neighbour for many years to come.

3.4 The impacts on current amenities, the loss of valuable recreation space at Sizewell and the impacts from the additional traffic associated with the proposed development of Sizewell C, are a major concern for the residents of Leiston and Sizewell.

3.5 These impacts are of particular concern for Leiston and Sizewell during the construction period – especially the first two years.

3.6 It should be noted that there are other very large construction projects planned to take place in the same very small area which will not only interlap but possibly interfere with the initial stages of SZC construction. These will have a cumulative effect on the parish and surrounding area and must be factored in. They will include Scottish Power Renewable wind farm projects, Interconnectors from Europe, the

continued dismantling of Sizewell A and the possible relocation of facilities on Sizewell B.

4.0 PUBLIC RIGHTS OF WAY, LOSS OF ACCESS TO BEACH AND IMPACT ON NATURAL AND HERITAGE SITES

4.1 Leiston-cum-Sizewell Town Council is particularly concerned about the potential loss of public rights of way and any restriction of access, including access to the beach from the Kenton Hills and Goose Hills Walks and along the beach itself (part of the England Coast Path – a new National Trail). The closure of Bridleway 19 is a significant loss of amenity which is only partly mitigated by the alternative route. This must be re-opened as soon as construction allows.

4.2 Access to the public beach is a fundamental right of residents and visitors alike, this is going to be severely restricted with the proposal for Sizewell C.

4.3 Although EDF Energy are suggesting that public access will still be permitted along the length of beach in front of the proposed Sizewell C site during most of the construction period, it will be a loss of the current amenity and views enjoyed at present which must be carefully considered and mitigated for. With the new easterly land take for the defences it is likely that this will mean walking along the foreshore for many years to come and then only when it is not closed off completely.

4.4 During the construction of Sizewell B a high chain-link fence with barbed wire on the top was used along the length of the restricted beach area. For Sizewell B this demarcated public footpath measured approximately 4m wide.

4.5 The fencing arrangement used during the construction of Sizewell B was poorly planned, and ultimately considered unsuccessful by local residents. The plans for Sizewell C at Stage 2 looked as though the issue had been addressed where, after the initial phase (when the access was planned to be along the foreshore), there appeared to be unimpeded views to the east for walkers using a reasonably sized recreational corridor.

4.6 At Stage 2 Leiston Town Council asked that "*Leiston-cum-Sizewell Town Council would wish to discuss any proposed designs for beach restrictions with EDF Energy before they are presented at the next stage".* No discussions have taken place and, with the easterly extension of the site boundary, it is unclear whether there will now be any recreational corridor at all. Figure 7.22 in the Consultation document infers the recreational corridor is wider at Stage 3 (than in Fig 7.20 in Stage 2 papers) and is clearly wrong and misleading. With the new defences the recreational corridor will probably have to ultimately be on the crest of them after construction is complete, rather than seaward, as the small protective dune above the shingle beach will no longer be there to shelter the smaller recreational corridor and this, now being narrowed, will be further eroded by coastal surges and the elements. This will be a major loss of amenity for our residents and visitors.

4.7 During the initial phase most definitely, but probably throughout the whole construction, **a sturdy maintained walkway must be laid on the shingle** for less able or steady residents as to walk along shingle is not easy.

4.8 It is noted that the existing track along the beach front is being used by the Civil Nuclear Constabulary. There is concern that EDF Energy will seek to use this existing track to access the rear of the site proposed for Sizewell C. Leiston-cum-

Sizewell Town Council are keen to ensure that this existing track is not used by any vehicles to access the beach, other than security vehicles. This must be formally agreed in writing by EDF Energy as part of any future development of the site and **LTC propose and request that this is covered in a statement of common ground between LTC and EDF Energy**

4.9 Leiston-cum-Sizewell Town Council also remains concerned about the impacts on the surrounding environment, including the Ramsar site of European importance, and the SSSI site of regional importance. The impact on other local heritage assets, such as Leiston Abbey, also still need to continue to be fully considered. **The Town Council would fully support any representations made by our neighbours in the RSPB and those made by Natural England and the Environment Agency in this regard**. Their expertise and understanding of the impacts must be addressed by EDF Energy. EDF Energy has a huge responsibility to protect our landscape if they are to be granted permission on this site.

5.0 SOCIO-ECONOMIC IMPACTS

5.1 Leiston-cum-Sizewell Town Council has identified the following socio-economic impacts as a result of the Sizewell C proposals:

- Increased pressure on emergency services and increased traffic on access routes and in the town.
- Potential negative impacts to some local employers but positive impacts overall in terms of local employment opportunities.
- Potential positive impacts to local education, skills and vocational training opportunities.
- Potential negative impact to the local economy following the peak of construction.
- Increased visitor numbers to the town centre during the day and evening.
- Distortions to the local housing market.
- Negative impact on tourism.

5.2 Where negative impacts are identified these should be mitigated for but equally important is that the positive impacts to the local economy are both secured and maximised.

Emergency Services

5.3 Further development at Sizewell will require appropriate consideration with the emergency services. Additional risks associated with the construction and operation should be identified ahead of the project to enable adequate planning, resourcing, training, site familiarisation and equipment provisions for the emergency services. Any extra resources must be specifically bought in and must remain earmarked for the development. There should be absolutely no dilution whatsoever of current resources before, during, and after construction. With the big increase in risk from extra traffic, heavy industry, hazardous materials and increased personnel in the parish a strategy must be looked at to protect the on-call firefighters in Leiston in particular. An increase in call outs will test the good will of the firefighters' employers so this needs to be addressed separately. Fears have also been raised, highlighted during the construction of SZB, that retained firefighters may be lost due to them changing employment and joining the construction site. EDF Energy is asked to be aware of this problem and to work with local employers on recruiting and retention

of firefighters during the project. EDF Energy are also requested to look at how they would support the improvement of poor response times of our Ambulance Service to postcode area IP16 for their own peace of mind as well as to re-assure residents they wouldn't get even worse service due to increased traffic. **It is requested that serious consideration be given to formally requesting that the joint Leiston Fire/Police Station also house a small ambulance station.** Leiston Town Council are aware that discussions are taking place between EDF Energy and Suffolk Constabulary and are in full support of any measures Suffolk propose to augment the Constabulary's provision to be able to effectively police the project, Leiston and the knock on effects in the wider area.

Local Job Market

5.4 Previous experience with Sizewell power stations has proved that the new jobs associated with the Sizewell C proposal will have an impact on the local job market. It is expected that EDF Energy will seek to employ a significant proportion of local people. Fair and equal opportunities need to be applied to recruitment for the Leiston-cum-Sizewell communities. Although it is noted that Sizewell C will have a potential effect on some local employers, Leiston-cum-Sizewell Town Council expects the local area to benefit from the employment opportunities that will be provided. It is expected and hoped that a Major Projects Agreement will be made with a Union to regularise the workforce.

Education, Skills and Vocational Training Opportunities

5.5 Leiston-cum-Sizewell Town Council also wants to see EDF Energy continue to make positive contributions towards education in the area through their liaison with our local academies. EDF Energy would be turning Sizewell into a highly specialised and technical area for several decades to come, therefore it would be only appropriate that they should look to pass some of these skills and knowledge into the local area. Leiston Town Council welcomes their current work with Alde Valley Academy and ask that they also support ancillary skills and vocational training which are just as important to support the estate. EDF Energy are requested to look at establishing a training and skills centre in Leiston, either on their own, or with other energy companies including the NDA. This would **complement the project and remain as an important legacy in this area once the station is established. This could be achieved in Partnership with the Leiston Together Board and Suffolk New College on the Coast.**

Managing the Impact Post Peak Construction

5.6 It is hoped and expected that a strategy is discussed and implemented in good time to manage the slump in employment after various phases of the construction programme. Leiston suffered from this during the previous builds and ways must be found to manage it this time.

Increased Number of Visitors to the Town Centre During the Day and Evenings

5.7 It must be remembered that the non-home-based-workers will also have the freedom to travel when they are not at work. They will likely use their own vehicles or walk into surrounding areas for personal or leisure use. Previous developments at Sizewell have resulted in serious 'anti-social' behaviour in the town, which must not be allowed to happen again. The implementation of the proposed contractual drug and alcohol policy should alleviate most of the worst problems and would allow

workers to enjoy the town and also help businesses in the process. This must be rigorous and consistent. **A continuous shuttle bus service into Leiston and to the off site sports facility** would benefit the workers and help manage the car parking situation. It is hoped that changing attitudes and better management will make the construction less challenging for the night time economy than was the case previously. **An active "Construction Consultative Committee"** between EDF Energy, the Town Council and relevant bodies should be set up early on to inform and communicate any issues that come to light.

Distortions to the Local Housing Market

5.8 Accommodation in the town is a big concern too. The demand for accommodation, some temporary and some more permanent, especially from better off workers, would distort the housing market in Leiston which, currently, is the only affordable area in East Suffolk. This would have a disproportionate effect on our young residents trying to get onto the housing ladder **or rent at an affordable cost** related to the low wages in the area. Members asked that EDF Energy investigate a scheme to provide financial support to young local families affected by this to avoid them being priced out of the local housing market. Mention is made of a housing fund at Stage 3 and this is welcomed but detail is needed on how a system to monitor and measure the impacts will be assessed and how the fund can be used constructively and appropriately for Leiston residents.

6.0 COMMUNITY BENEFITS

6.1 This section concentrates on the mitigation measures required to alleviate the negative impacts, and to secure the positive impacts, identified under section 4 and 5 of this response. These are set out more fully at Annex A and B.

6.2 The proposed cycleways and improved footpaths from Sizewell round to Eastbridge are welcomed. It is still strongly requested that **a permissive path be installed under a 3-span access bridge (Option 3 in Stage 2) (or adjusted causeway) to allow residents to walk between the Kenton Hills walks and the beach as soon as possible during the construction phase**. The current causeway option has been selected over the much preferred bridge option with very little understandable justification. It precludes any access to the beach except via the long way round to the sluice for too many years, if ever, and is not supported. The provision of a path under the "causeway" would be a positive boon for residents and allow access to the Minsmere beach walks from Kenton Hills avoiding the need to negotiate the beach works and associated disruption. As the SSSI is being protected from the laydown area a permissive path just outside the southern protected boundary of the laydown site would be very feasible, easily established and much appreciated. It would also allow a circular walk using the new bridleway for those who would enjoy that. This one addition would have a big community benefit. Regarding the new cycleways, another crossing south of the Kenton Hills entrance on Lovers lane, in a safe place, with a footway/cycleway on the east side of the road up to the Kenton Hills entrance would also be very beneficial. Currently, if the cycleway around Aldehurst Farm is used it looks very difficult to cross the road on the Laboratory corner to gain access to Kenton Hills.

6.3 The new route and cycleway (with crossings) must be in place before Bridleway 19 is closed.

6.4 To help alleviate the impact of increased usage of the town's daytime and evening facilities, to help manage any unforeseen issues arising from the construction and to increase the amenity available for your workforce, the following mitigation measures are sought:

- Funding of Improved infrastructure in the town centre to alleviate the impact of increased traffic and parking.
- Involvement and help in up-grading and relocating of the library to allow space for increased online stations. The Library is part of the Town Centre Regeneration plan.
- A representative from the Town Council on the Suffolk Community Foundation Board overseeing the community fund.
- A major role for the Town Council in a responsive and powerful "Construction Consultative Committee" to ensure issues are dealt with quickly.

6.5 The most significant project which EDF Energy would benefit from involvement with though would be the regeneration and construction of a new town centre as proposed in the Town's Neighbourhood Plan. EDF Energy would be very welcome to work with the Leiston Community Land Trust and the Leiston Together Partnership (East Suffolk District Council, LTC, CLT and SCC) to help achieve a viable, sustainable and attractive development which would benefit all Sizewell workers now and in the future once Sizewell C construction is complete. Later in the response there is a recommendation that the Visitors Centre be moved into the town too, if a suitable location can be found, as this would add to the tourism provision in the town. EDF Energy is Leiston's major employer and neighbour and it would be beneficial for everyone if they became a partner in the Town's future. Again, this is covered more fully in Appendix A.

6.6 Further information on the community benefits and improvements being put forward by Leiston-cum-Sizewell Town Council are set out in Appendix A and B. These set out the Town Council's assessment of immediate and long-term requirements, and should be used as the basis for any further discussions with EDF Energy on this particular issue. ***EDF is encouraged to enter into meaningful discussions with the Town Council at the earliest appropriate phase of this project and before the public examination sessions with PINS*.**

7.0 TRANSPORT

7.1 Leiston-cum-Sizewell Town Council originally supported EDF Energy's proposed transport hierarchy: sea – rail – road. They note the environmental factors, the cost and the confidence in delivery of the sea option for it to now be dropped and this has been welcomed by many in the parish. It is felt however that there could be much more use made of the Beach Landing Facility and further exploration of the sea option should be taken forward.They find the veiled references to the viability of achieving a rail strategy in time concerning too but would support this over road. If road remains the only strategy at the DCO stage then the very maximum mitigation schemes must be offered including a 4 village by pass on top of all the schemes detailed in Stage 3.

7.2 Leiston-cum-Sizewell Town Council support the maximum by rail option and are happy with the choice of the Green Route. A small temporary (and backup) railhead just east of Eastlands Industrial Estate is only acceptable during the early construction phase and whilst the Green Route is being built although it is noted EDF wish to use the existing railhead for this phase. The existing railhead is not

suitable, even with an extension and should be discounted. It will be easy to establish one in the LEEIE and this should be firmed up. **For the Railhead and Eastlands options train movements should not be permitted between 2100 and 0700 hours due to the proximity of the line (and railheads) to residential areas.** This appears to be in the document but it was felt it needed reinforcement. The Green Route, once completed, would then avoid the double handling of freight and keep disruption to traffic in Leiston (two level crossings closed numerous times a day) down significantly. **There remains concern about the queuing time and impact on residents, Sizewell B staff, Sizewell A staff and visitors, caused by the level crossings. The site accesses to the LEEIE will also seriously disrupt the Crown Farm area and traffic flow. Traffic on Station Road, backed up in front of the Masterlord Industrial Estate when gates closed is also of concern during this phase. All these issues also affect the emergency services.**

7.3 If the Green Route is decided upon then mitigation would have to be made for the first two years for freight coming through Leiston until it was in use. It would be totally unacceptable to have manned crossings anywhere on the route to the LEEIE from Saxmundham so automatic barriers would have to be installed, before day one, at King George Avenue, Station Road and the other crossings affected. When the Green Route **is** constructed, again, there needs to be automatic barriers on Buckleswood Road and Abbey Road. **It is not acceptable to block Buckleswood Road or any other road or to divert other public rights of way for purposes of this construction**. (A bridge must be as costly as an automated crossing in Buckleswood Road?). The Green Route should be used to take traffic off Lovers Lane and must be the preferred route for all the construction companies to avoid loading and unloading twice. The Buckleswood Road closure would also have an unacceptable impact on local businesses.

7.4 There is serious legacy potential for a station to be built alongside the siding on LEEIE toward the end of construction for future passenger use. (This would require a small car park)

7.5 The traffic flows from the models indicate the biggest impact on Leiston will be on Waterloo Avenue (Saxmundham Road). This is a difficult road to navigate and has been subject to a TRO to get it as free flowing as it currently is whilst still maintaining essential on street parking. It is a very uneven and pockmarked surface and is very noisy for residents on that road. A smooth noise treated surface would be required to ease this loss of amenity. A similar treatment should be given to the road from Knodishall right down Haylings Road, Park Hill and Station Road as this route will also have heavy use.

7.6 ***A clear picture of what is expected to happen in King Georges Avenue is still missing****! This was stated in our Stage 2 response. The detail and proposed mitigation for this important route is required as soon as possible and definitely before Stage 4/DCO. This is especially pertinent during the initial two years and Leiston Town Council need to discuss this further with EDF Energy as soon as possible to ensure baselines and predictions are understood. It is obvious that a large proportion of the traffic that EDF Energy predict will use Station Road will actually use King Georges Avenue and bleed from the other predictions will also occur.*

7.7 The more specific detail now attached to the Land East of Eastland's Industrial Estate (LEEIE) gives rise for serious concern with the positioning of the topsoil stockpile and other issues regarding the caravan site and the site entrances. Option

2, for the rail siding to be situated North of King Georges Avenue, is the only sensible one and this would have LTC support until the green route materialises. With the historic and severe flooding problems experienced at the end of Valley Road by Archway Cottages however, it is felt that increasing the height of the land immediately to the South of this with the potential for increased run off from the soil stockpile would unacceptably exacerbate that situation. A complete and comprehensive surface water scheme must be presented at Stage 4. This would also include all the details on how sewage is dealt with on the site.

7.8 The eastern end of Valley Road that runs beside the LEEIE (locally named Kemps Hill) should be considered carefully for upgrade and investment as clear legacy mitigation. This road will be the main route into town for the 600 residents of the caravan site for which it is clearly unsuitable in its present form, especially after dark. The two options would be to pedestrianise it (In accordance with the Neighbourhood Plan) or to widen it and include a footway/cycleway and more passing places. Each option would need discrete lighting. The latter would allow large vehicles down to the sewage treatment plant from Lovers Lane and allow residents to safely use this road as a more forgiving carriageway. As a very poor alternative, a cycleway could be constructed behind the hedgerow on the Aldhurst Mitigation Site to allow residents to enjoy the current amenity they have to join up with the (new) bridleway and cycleway from Sandy Lane as another option to the footway/cycleway above. This could be used by the workforce and be a safer option than walking in the dark in the middle of the carriageway. This would be the absolute minimum mitigation for this option as, whatever is decreed, caravanners will take this route. A review of the type of lighting required on this stretch of road (or footway) should obviously be taken in relation to the adjacent wildlife area.

7.9 If the rail option comes forward the loop from Wickham Market to Melton is welcomed and is essential to ensure the East Suffolk Line (now finally on an hourly service) is not disrupted in any way by freight (like the Felixstowe line). **This would, otherwise, be unacceptable to all commuters and travellers who rely on this line.** In fact, for little extra cost, doubling the track between Saxmundham and Woodbridge (on the old track bed) would provide an important legacy and give EDF Energy more options. A thorough assessment of the impact of long, slow moving, diesel goods trains on the wider East Suffolk and Liverpool Street line is essential to ensure that no conflict evolves with the Felixstowe container traffic and that no passenger service is affected. This was not evident from the documentation. The studies into the impact of noise, vibration, air quality and disruption to adjacent properties is noted and welcomed. At this stage Leiston is protected from these impacts during the anti-social hours and this must be retained in your policy. The night time movement to the parking area near Saxmundham still affects properties elsewhere though.

7.10 **Abbey Lane** will continue to be an increasingly heavily used rat run. It is unsuitable for the level of traffic it currently receives **and ways of improving it or managing it must be investigated and implemented. There is no mention of traffic volume impacts on Abbey Lane in the presented documentation, either in the Transport Strategy where other lesser comments have been acknowledged or in the Traffic Modelling section where no relevant location for study is identified. Leiston Town Council, again, requests that this be addressed in any future documentation.** This could be the subject of focussed discussions/consultations with EDF Energy along with the town centre.

7.11 The Household Waste Site on Lovers Lane is a great community asset and an essential one for this whole area. **As a priority**, before the traffic flows increase along Lovers Lane the minimum improvements offered, in partnership with SCC, must be made to the site to make it safer to use for everyone's sake. This should however be escalated to include a perimeter road around the site to be put in on EDF land so vehicles enter the site some distance after leaving Lovers Lane – this would give plenty of space to queue off road when the bins are being serviced (HGV entrance still from Lovers Lane). If the current situation prevails, even with the proposed layby, there will be severe congestion and real road safety issues at this point (as is already the case). The County Council would need to relicense the site and they could possibly increase the capacity of the site at the same time.

7.12 Serious consideration should be given to imposing a permanent 40mph speed limit for the length of Lovers Lane due to the large volume of traffic, the proposed crossings, the site entrances and the other National Infrastructure Projects coinciding with the project on the C228.

7.13 The maximum by sea route sounded the best option in theory but is now discounted. The effect of the **Beach Landing Facility** though, assuming the sea option is not reinstated, must be studied by the EA and MMO to ease the worries of how this affects the coastal process. There is concern about the permanence of the Beach Landing Facility and its potential to become an unwanted groyne. A comprehensive and transparent scientific observation and analytical package should be put in place for the years to come to measure any possible effects. The landscaping and soil levels either side of the hardstanding from North Mound to the sea will need constant monitoring and maintenance to ensure they do not detract from the visual amenity or become an obstacle. **LTC propose and request that this is covered in a statement of common ground between LTC and EDF Energy**.

7.14 It is the Town Council's firm opinion that a roundabout should be installed at Crown Farm Corner at the top of King Georges Avenue. This would allow Sizewell A and B workers and residents (from the town) to get onto the C228 easier and more safely once that road becomes busier.

Workers

7.15 At Stage 2 EDF Energy estimated a "central case" workforce of around 5,600 workers. EDF Energy estimated that approximately 2000 of those will be home-based workers, and 3,600 will be non-home-based workers. On completion of the build there will be continued peaks and troughs with three reactors undergoing rolling outages. Stage 3 confirms this and gives more detail on the estimations based on experience at Hinkley plus a stress test for many more workers than expected to ensure current plans are adequate.

7.16 Leiston-cum-Sizewell Town Council is concerned about the potential 'informal' car parking that may take place in and around Leiston and Sizewell. There is a genuine fear that some workers may opt to drive closer to work instead of using the 'park and ride' system. There appears to be an intention to "register" workers and hold details of their car numbers which is supported and welcomed and may help eliminate the worse problems. There is also the prospect of houses in multiple occupation where the number of vehicles will exceed the on street parking capacity in the town. In this instance it is requested that EDF Energy consider whether the workers could leave their cars on site and use the bus service to and from work as appropriate.

Buses

7.17 The idea of park-and-ride is a positive one, which should in theory remove some potential private vehicle traffic from the roads surrounding Leiston and Sizewell.

7.18 There will however be a lot of bus movements per day, which is likely to create a constant flow of buses to accommodate the varied shift patterns. EDF Energy believes that spreading the workforce shift patterns throughout the day will avoid network peaks albeit there will be a constant stream of buses on the B1122 amongst the HGVs if no link road is built.

7.19 It is a fact that buses frequently hold up traffic and cause congestion. This is likely to increase congestion on the surrounding road networks, which will have an impact on residents, businesses, and visitors to Leiston and Sizewell, and how they get about their daily business. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 must be installed if no link road is built.

Heavy Goods Vehicles (HGVs)

7.20 Assuming a road led strategy, EDF Energy has estimated that at the peak of construction there could be up to 200 extra HGV/bus movements through Knodishall (and onward down Park Hill) and 1,450 extra a day along a Theberton by-pass/link road. The Light Goods Vehicles not operating under the postal consolidation facility protocols however (350) may well choose the A1094 which will impact Leiston enormously. The system described to us which will be applied to all vehicles over 3.5 tons sounds workable and is strongly supported. HGV's moving outside the contractual requirements to exit and access the site must be dealt with. It is essential that the return trips (empty) should also be regulated.

7.21 As with the issue of buses, HGVs will cause congestion to the surrounding road networks which will have a knock-on effect to the residents and businesses of Leiston and Sizewell. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 and in Yoxford must be installed.

7.22 All the junction improvements including Friday Street and Yoxford are fully supported, insisted upon and must be completed before the commencement of the project. Traffic delays due to the construction would be longer and more frustrating for our commuters should they overrun into the beginning of the construction phase due to the increased traffic this would bring just exacerbating the problem. The link road is absolutely essential to a road led strategy and, again, must be completed before commencement of the project. It is the Council's view **that this link road is also needed for the rail option as the level of HGV traffic on the B1122 will continue to be overly excessive**.

Noise, Vibration, Dust and Air Quality

7.23 Potential environmental impact is considerable and widespread everywhere you look. Coastal process, noise, air pollution/quality, flood risk, groundwater extraction, traffic and of course, disruption and loss of amenity for all the local residents (to name a few).

7.24 The issue of noise, air quality (including dust) and vibration in relation to local communities is of significant importance. It is unclear how operations at the LEEIE will affect local residents but it is assumed that the noise and light pollution, in particular, will be significant and would affect residents up to 1km away. The EIA will be very comprehensive, large and difficult to understand in all likelihood and the fear is that the Non-technical summary will be too simple. **EDF Energy are requested to produce something in the middle which details how they will be mitigating and monitoring all the expected threats to the environment**. This should include air quality monitors at junctions and rail crossings which send an alarm at certain levels, (for instance), automatically triggering pre-determined actions designed to ameliorate the threat. A base line must be established at all the expected trouble spots before construction begins and the limits agreed.

Overall Traffic Assessment

7.25 It is considered that the steady stream of additional traffic throughout the days, weeks, months, and years during the construction of Sizewell C and beyond is going to have a noticeable and significant impact on Leiston and Sizewell and on residents who commute from the town.

7.26 Leiston-cum-Sizewell Town Council would prefer that no Sizewell C traffic passes through Knodishall or Leiston and are very concerned at the impact on the town centre during the first phase when access to the site will be through Sizewell B and Sizewell A. They understand the freedom local workers will have to choose their routing though so it is very disappointing that our request at stage 2 for **EDF to fund a study on all aspects of traffic movement around and through Leiston has not been done. There is a serious need for control measures, signage and enforcement to ensure the correct routes are used and that the town centre does not suffer unduly**. *Leiston-cum-Sizewell Town Council also requested that they be involved in these discussions from the outset as local knowledge (and current issues) are well known*. **No approach has been made at all and, again, this is very disappointing**. Dialogue would have at least assured the Town Council that every available mitigation had been considered and assessed for feasibility. It is understood that the EDF Transport Team will be looking at this issue after Stage 3 and LTC would like to be involved in this please. Protocols and inducements should also be worked out to encourage avoidance of the town centre.

7.27 **In summary, the additional HGVs and buses on the B1122 if no link road built (rail option), the potential for 'informal car parking' in the town, the control of traffic through Leiston overall and the town centre in particular along with the noise and light pollution from LEEIE are of particular concern to Leiston-cum-Sizewell Town Council.**

8.0 EDF ENERGY OPTIONS

8.1 Leiston-cum-Sizewell Town Council has the following comments to make on the choice of options since the Stage 2 consultation.

Accommodation

8.2 Leiston-cum-Sizewell Town Council still welcomes the option to incorporate a practical and well-run accommodation complex within walking distance of the construction site. This will reduce car travel and bus journeys. The intention to place

the sports site in Leiston is also very welcome. The new road, cycleway and bridleway arrangements look manageable and safe and provide good connectivity for Leiston residents who take recreation across the Sandlings beyond Eastbridge. Other suggestions for enhancements to this PROW scheme are made above, in particular, a crossing south of Kenton Hills entrance and a permissive path under the adjusted causeway.

8.3 Sports provision. The proposed off site pitches and MUGA at Alde Valley Academy and Leisure Centre must be floodlit to ensure they are useable all year round. It is requested that a further 3G pitch also be laid at the Leiston Town Athletics Association (LTAA) in Victory Road (home of Leiston FC) at the same time as a community legacy for the Leiston Town youth teams – this would be extremely beneficial and much appreciated. It would allow the numerous youth teams to all take advantage of an improved training facility – the current field has to be restricted in periods of bad weather whereas a 3G pitch would allow access all year round.

8.4 As Sizewell A is Government owned under the Nuclear Decommissioning Authority, EDF Energy is encouraged to engage with the regulatory authorities to investigate using as much of the A site as possible for relocation of Sizewell B facilities rather than desecrating Coronation Wood and the Pill Box field. These relocation decisions and plans should not be approved **or, as a minimum, have a planning condition, that they not be allowed until the DCO obtains consent** if they do not use Sizewell A land.

8.5 It is the firm recommendation of Leiston Town Council that the Visitors Centre not be relocated to Coronation Wood but that it be sited in the town centre as a tourist attraction much more accessible and visible than on the licensed site. This would allow much better access as security would not be an issue and any tours could set off from here, again, with security already concluded. It would also reduce the number of vehicles going to the site as visitors could be transported by minibus.

8.6 There will be impacts on Leiston's infrastructure as a result of the proposed accommodation campus, which needs to be carefully considered. The off-duty workforce will have access to private vehicles and will undoubtedly visit Leiston for a variety of different reasons. Currently, Leiston will have difficulty in physically absorbing the demands of Sizewell's off-duty workforce, particularly parking. Therefore, the impacts on Leiston must be fully assessed and understood, **a shuttle bus running on a sensible agreed schedule would be useful in alleviating the parking issue. Enhancements to the current parking facilities, working in partnership, would also be welcome to mitigate this. (See Annex B)**

Park and Ride

8.7 Leiston-cum-Sizewell Town Council supports both sites chosen for Park and Ride albeit the Wickham market one has some issues with traffic from the west. This would be the case if the Park and Ride were further north along the A12 in any case. There is legacy potential for the Darsham site to continue to be used by local people as a free car park for commuting after construction and this is welcomed. Perhaps some slots could be allocated for this purpose from day one. At Wickham Market the slip road onto the A12 just before the reduction to single carriageway will make for hazardous situations occurring and a solution to this should be sought.

8.8 The Leiston-cum-Sizewell Town Council are adamant there should be no additional traffic through Leiston if at all possible. Ways of trying to reduce the predicted journeys through the town must be investigated and the Town Council would wish to meet EDF Energy before the DCO to examine local traffic management more forensically– this would cover the other aspects of Lovers Lane, Abbey Lane and the C228.

8.9 A 'vehicle number plate recognition' system must be part of any solution (and we believe this has been promised) and would be a way to monitor additional traffic in the town over the predicted levels EDF Energy currently suggests. This would then enable corrective policies to be put in place to counter the problem through the Community Construction Consultative Committee (name to be confirmed).

Transport Improvements

8.10 Leiston-cum-Sizewell Town Council has been considering the options for highway improvements that are currently being put forward by EDF Energy at this Stage 3 consultation.

8.11 It is noted that any potential transport improvements must properly consider the emergency services, so that any potential impacts are understood. The Town Council would therefore support any responses made by these organisations.

8.12 The B1122 is a vital transport route into the Sizewell site, and it is considered that it will need some considerable improvements to be able to continue to serve the nuclear power station well into the future. The Leiston-cum-Sizewell Town Council therefore fully supports the roundabout at Yoxford and the Theberton by-pass proposals as a minimum and a legacy. **The link road option is a minimum for the road led strategy and should also be included in the rail led strategy as there will still be unacceptable levels of HGV, bus and car movements along the B1122 during construction under this option.**

8.13 Country lanes and Public Rights of Way that are affected by any improvements, be it the link road or the Theberton bypass, must be kept open and accessible. The documentation gives concern that some of these might be closed off. The existing network must remain useable.

8.13 The link road, should it prove successful, would be a further legacy if it was retained after construction but there are concerns about it ultimately then becoming a catalyst for housing growth in the countryside once the site has settled into the operation phase.

8.14 At Farnham the two-village bypass is welcomed as it creates a safer junction with Friday Street. This part of the consultation should depend entirely on the views of the residents affected though and the Farnham resident's views must be given primacy in the final decision. However, with the potential impact of additional movements through the villages of Marlesford and Little Glenham, a four village option is a minimum for a road led strategy to mitigate the environmental impact at these locations and the increase in noise during unsociable hours. Every avenue must be explored to get this option funded as soon as possible. Other incipient NIPs should contribute accordingly.

8.15 The small adjustments and improvements to the various junctions are all welcomed.

8.16 A similar exercise must now be done on the local roads around Leiston to ensure an overarching signage scheme is prepared to guide traffic clearly to their proposed destinations. This has to include relevant “do not follow Sat Nav” signs! The Town Council, again, would like to be involved in this.

8.17 The Town Council are unhappy with the current siting of the helipad and feel that there must be a more suitable site which does not disturb the Broom Covert wildlife area more than necessary.

9.0 CONSTRUCTION PHASES

9.1 Leiston Town Council is very concerned about the proposed operations during Phase 1 of the construction. The increased useage of the C228 will cause disruption and congestion along the only access to SZB and SZA and will make cycling and walking uncomfortable or even undesirable. The entrance to the proposed site from the B1122 should therefore be a priority, followed by the Access Road and the SSSI crossing. The commencement of works to the foreshore should not be undertaken until these are in place and other operations where spoil has to be removed should also wait until this access is complete. The adverse and severe effects of using the entrance to Sizewell B for anything other than works to help accommodate this must be avoided. Every effort should also be made for the wider transport infrastructure links and signage to be in place before Phase 1 commences. It is appreciated that the timeframes for this may well mean they overlap but this will hinder EDF work and the local population to an irritating and unfortunate degree. Please continue to note the demand for there to be no access to the frontage of the site from Sizewell Village.

10.0 EVIDENCE

10.1 These representations have largely concentrated on localised amenity impacts and traffic impacts that will be associated with the proposed development of Sizewell C.

10.2 It is unclear and difficult to understand just how much impact the soil removal and borrow pits will make on the visual impact of the site. It is expected that the County Council will comment more fully on this as well as the Environment Agency as, with minimal understanding of the environmental consequences, Leiston Town Council would support any concerns raised by these agencies.

10.3 The Environmental Agency must be very clear that the proposals will not in any way affect the natural flow of the Leiston River or the operation of the Minsmere Sluice (including interfering with the coastal process via the emerging BLF proposals). There should also be an undertaking from EDF Energy to pledge resources into ensuring that the outflow from the Leiston Water Treatment Plant will always be maintained to its current level so that no back up or flood problems occur in the future as well as becoming responsible for the sluice and outlet there as any coastal process which affects these will undoubtedly be due to the works at SZC.

10.4 The overall land-take of the laydown site has reduced marginally from stage 2. With the experience of Sizewell B, Leiston-cum-Sizewell Town Council would suggest that some temporary uses will last longer than the 10 years envisaged, some closer to 20 years. Further information on the temporary uses is therefore also requested with a clear timetable for decommissioning. It is also difficult to envisage where the new line is to the east of the site without accurate mapping. It does look as though the whole project is beginning to encroach unacceptably beyond this onto the beach. In line with the frontage of Sizewell B must be the minimum encroachment. The

height of the defences has also pushed them eastward at the bottom. These will be fenced for many years to come to allow regrowth so a footpath close to the top of the defences could be incorporated into the design to allow for sea level rise and weather scouring across “the recreational corridor” to the bottom of them.

10.5 Leiston Town Council understand EDF Energy are in discussions with Essex and Suffolk Water and that there are no problems in them delivering enough potable water. The EA and The Local Flood Authority will be responding and liaising with EDF Energy on the use of water and run off etc. and Leiston Town Council would support their recommendations on these aspects. Issues of drainage and run-off highlighted by the Minsmere Levels Stakeholder Group (of which the Town Council is a prominent member) must also be addressed.

11.0 CONSULTATION PROCESS

11.1 This further stage of consultation was necessary and welcome. It added a lot of detail and firmed up some of the options to allow more critical assessment. **Before moving onto Stage 4 however the Town Council would welcome additional talks with EDF Energy to discuss the responses from this stage and to also be included in any discussions as they set out their preferred direction of travel to address them**. Any workshops or discussions with East Suffolk District Council (ESDC) and SCC should, as a courtesy at this stage, now include an invitation for Leiston to have a representative present. This request was ignored at Stage 2 and it is dispiriting and frustrating that no attempt was made to engage with members on virtually any of the issues requested in the last two years.

12.0 CONCLUSIONS

12.1 Leiston-cum-Sizewell Town Council cannot support the proposals for a further nuclear power station at Sizewell until the impact on amenities, environment and traffic are resolved satisfactorily in relation to Leiston and Sizewell. It is looking increasingly probable however that the use of this **limited site is too ambitious and would ultimately be wholly detrimental to the surrounding area**. Is the negative impact greater than the benefits the project brings? There is low unemployment in the immediate area so short term jobs at the construction site will be at the expense of long term sustainable jobs in the tourist industry which will be severely affected. There will be new unsightly pylons in the AONB. The affects on the Coastal path are unquantifiable at this stage but will be severe. The socio-economic uplift to the area and businesses will be substantial and welcome. Training and skills could be of benefit if liaisons are established in the town and, trying to look past construction, EDF Energy’s proven stewardship of the countryside has been beneficial to the area after Sizewell B.

12.2 Impacts on the beach, public rights of way, and areas of local, regional and international importance from a heritage and environmental perspective, must all continue to be fully and appropriately considered. **The current suggestions are the minimum and must continue to be part of the proposals**.

12.3 Issues associated with previous developments at Sizewell, including the loss and restrictions on public rights of way, and anti-social issues associated with such large scale development, must all be correctly addressed.

12.4 There is a worrying lack of detail, particularly in areas that affect the centre of Leiston, especially the traffic bleed from the major routes. The traffic and increased

population in Leiston Town Centre, especially during the early construction, will significantly affect residents and the community. A comprehensive package to investigate, manage and alleviate this must be agreed with Leiston Town Council.

12.5 It should be noted that there will be spent nuclear fuel stored on this site for the lifetime of the station (and probably beyond). This is a long term blight on the Parish of Leiston-cum-Sizewell.

12.6 The maximum transport infrastructure options need to be provided to alleviate the east Suffolk road network as much as possible. The lead in and first two years of the construction phase will leave infrastructure that will have to serve a growing population in this area for years to come. **Getting it right first time and to a high standard** will be of clear benefit to everyone.

12.7 Overall, it is considered that, with the appropriate mitigation set out here, the options supported in this response are the best for Leiston-cum-Sizewell and should continue to be refined and negotiated with this Council to allow a fruitful and beneficial partnership to go forward for the years ahead if Sizewell C gains Secretary of State approval.

APPENDIX A

Leiston-cum-Sizewell Town Council – Immediate and Long-Term Community Requirements.

It is believed that this project is of such a scale and is of such national significance that the normal criteria for Section 106 considerations is not sufficient to compensate the Parish of Leiston-cum-Sizewell for hosting and accommodating the vast majority of the disruption and inconvenience that will accompany the build. The long-term legacy of an access road across the AONB, a large prominent industrial complex on the heritage coast, also in the AONB, plus the plans to store spent fuel in the Parish for an indefinite period are also factors that need mitigation through various immediate compensatory measures and a long-term community fund.

The Town Council appreciate that the legal framework for such matters will be through the Principal Councils **but would request that strong support be shown by EDF Energy for Leiston-cum-Sizewell's aspiration for a certain percentage of any long-term community fund to be protected and earmarked for post code IP16** in which the whole of the works will sit. The Town Council is willing to administer any local fund should that be considered a better alternative and is comfortable with, and constituted for, a legal agreement to do so.

Appendix B covers the town centre and the issues of traffic and community facilities required for the construction. This sets out an approach that EDF Energy may find more appropriate, localised and holistic to help them deal with many of the Town Centre issues being identified.

The other, more specific, items on the wider scheme that require mitigation measures which would help alleviate the impact of Sizewell C and meet resident's needs are summarised below.

Required Mitigation Measure/Community Benefit	Why it is required?
Include a crossing for cyclists/walkers on Lovers Lane 50m south of entrance to Kenton Hills.	The proposed cycleways around the Aldehurst Farm Habitat site need a link to the Kenton Hills Walk away from the Laboratory corner which would be unsafe.
Enhance existing cycle path along C228. See paragraph 9.1	The new cycle path proposals (for Stage 3) are welcome and essential along the B1122 and Lovers Lane. The current cycle path to Sizewell needs refurbishment and strengthening as it will be an essential facility during the first two years when the C228 takes all the construction traffic.
Improvements to Valley Road (East) aka Kemps Hill. See paragraph 7.8	When the caravan Park and laydown/temporary railhead north of Crown Lodge are constructed this section of Valley Road needs to be either two way or have a dedicated cycleway/footway put in alongside the existing narrow track for pedestrian safety. This would be a very useful legacy project that would benefit the town enormously and allow EDF workers to walk safely to town. If, widened and upgraded it would allow HGV tankers access from Lovers Lane to the sewage treatment plant (as a further legacy).
Highway low noise resurfacing from Highbury Cottages to White Horse Corner and through Knodishall all the way to Kings Road in Leiston. See paragraph 7.5	Mitigation for the huge increase in private and white van traffic expected through these two entry routes, especially during the first two years. The noise from the poor surfacing at the moment is annoying and further increase in traffic would make it very uncomfortable, especially at night.
Strengthen the beach track that the Nuclear Constabulary use from Sizewell Gap to Sizewell C site. Current issue.	This will protect the dunes etc. from further erosion and is work that currently needs done. The police will be more vigilant during construction one presumes and use it more so a small investment now would be very useful. (Notwithstanding a written agreement that this will not be used for Sizewell C work of any sort.)
Engage with the Leiston Works Railway. Consider a future station. Ongoing community engagement Provide a 3G pitch at the LTAA in Victory Road to enhance and secure training facilities for the	Engagement with the industrial heritage of the parish by becoming involved with the Leiston Works Railway Project and looking at ways to possibly leave an impressive legacy from the rail works proposed for the construction. A Passenger service could be re-instated after construction with a station on LEEIE – useful for outages with residual Park and Ride facilities left at Wickham perhaps. This would be an ongoing item and something to investigate. The proposed off-site sports facilities at Alde Valley Academy would, most probably, have to be reserved for SZC staff and workers for the majority of the day. The

Required Mitigation Measure/Community Benefit	Why it is required?
numerous youth football teams that are parented by the Leiston Footbal Club at this location. Para 8.3	provision of another facility at the LTAA would allow young people to enjoy similar facilities at all times and be able to train and play throughout the year.
Support for a small ambulance station at the Fire/Police station in King Georges Avenue. Para 5.3	To protect response times to IP16 once construction and construction traffic increases congestion on routes to Leiston.
Establish/support a training and skills centre in Leiston Para 5.5	In partnership with Suffolk New College (on the Coast). An important legacy but much needed for vocational training during the build to increase local skill base.
EDF Fund a comprehensive and traffic survey around Leiston	There is no baseline which the inevitable and unquantifiable (at this time) increase in traffic through the narrow and restricted town centre of Leiston can be judged. A study needs to be done to ensure this can be accommodated and ameliorated properly.
Install evidential quality CCTV (unmonitored) in town centre, on King George Avenue and on Valley Road. Community and worker safety.	This is for the safety of residents and workers alike.
Replacement of the Dinsdale Road Toilets with a modern facility that could remain open 24/7 (currently closed at 6pm). See paragraph 6.4	Small but important item retained from Stage 2. To help meet the needs of an increased resident, worker and visitor population. This is the tourist and transport hub of the town and centre of the night time economy. It would be essential for EDF workers as well as residents.
A permissive path be provided from Kenton Hills to the beach under the access road/three span bridge as soon as possible. See paragraph 6.2	The access to the Minsmere levels along the beach will be ugly and difficult. The current access to the beach from Goose Hills is a major asset and allows the RAMSAR, SSSI and AONB to be fully enjoyed.
Household Waste Site on Lovers Lane realigned and enlarged See paragraph 7.11	Road Safety. A road around the current site to allow traffic to queue off road is essential. A layby is not enough and would not work well.
Substantial walkway to be laid across the shingle during initial beach works and for duration of construction. See paragraph 4.7	To allow less steady residents to negotiate the Coast Path.
A shuttle bus into town from the campus and the implementation	To alleviate anti-social behaviour and to allow workers to enjoy the night time economy responsibly.

Required Mitigation Measure/Community Benefit	Why it is required?
of a strict drug, alcohol and acceptable behaviour policy. See paragraph 5.7	
Double railway track from Saxmundham to Woodbridge Para 7.9	A better alternative to the proposed passing loop and a major legacy.
Leiston Town Council and other relevant bodies form a "Construction Consultative Committee" with EDF Energy at the outset of this project to meet regularly and have executive powers to help the project run smoothly as issues are identified. Para 5.7	It was an essential body during the SZB build and should be repeated for SZC. The Town Council played a major role in forming its remit and determining its Agenda to quickly address any issues affecting the local residents and visitors etc.

APPENDIX B

LEISTON TOWN CENTRE
IMPACTS AND PREFERRED MITIGATION WITH REGARD TO SIZEWELL C PROPOSALS

Introduction

1. There are several elements to the proposals presented at stage 3 of the EDF Energy consultation for Sizewell C that give cause for concern. Appendix A summarises the majority of mitigation measures sought for the wider parish area but it was felt necessary to try and establish a more robust and far reaching solution to the problems that will be faced in the town centre itself. The initial paragraphs below are carried forward, repeated or summarised from the main response to enable this Annex to be viewed separately.

2. The most immediate is traffic and how cars and vans will access the construction site and the Land East of Eastland's Industrial Estate (LEEIE) in the early years of construction.

3. Concurrent with this is the expected popularity Leiston will have amongst the workforce for shopping, recreation and entertainment.

4. Both of these issues will have a major impact on residents and visitors when measured against the current (2019) baseline.

5. These immediate impacts will be felt over and above the other town centre issues noted in our main response of

    - Housing – young residents seeking private rental accommodation. This is currently reasonably priced but could become difficult to find and more expensive as workers find a base near the site.
    - On street parking pressure from Houses in Multiple Occupation
    - Town Centre parking – for workers, residents and visitors alike will become problematic
    - Labour market – will be distorted
    - Commuting – roadworks and increased traffic will make this more difficult for residents working outside Leiston
    - Night time economy – albeit this could be extended by shift patterns to daytime too. It is anticipated that this will be much better than when Sizewell B was built but the increase in numbers and the ease of perpetrating anti-social behaviour will make the town centre less desirable for many residents and potential visitors.

6. The number of workers, the perceived potential for antisocial behaviour and the squeeze on parking will possibly affect the evening custom at the Film Theatre although this could be offset by the number of workers who might take advantage of this facility.

7. Overall, Leiston-cum-Sizewell Town Council is very concerned about the change of tempo, rurality and amenity that its 6,000 residents currently enjoy in this genteel market town.

Evidence

8. There are currently no studies that predict the number of extra journeys that would transit to Sizewell C through the town centre. There are no baselines in the presented documentation either. The traffic increase experienced during an outage gives an indication of the gridlock that can be expected to occur and the first thing that needs to be done is to gather evidence of the current situation.

9. It is clear, even over and above anecdotal submissions, that many workers, coming from outside Leiston before the Park and Rides are established will be tempted to avoid the trek down Abbey Road to Lovers Lane and will choose to go straight through town. The bleed from the predicted journeys in the presented documentation (for Waterloo Avenue and through Knodishall) will be substantial too.

10. The town centre suffers from narrow pavements and an inconvenient set up at the town centre crossroads which increases waiting time at the traffic lights. The pavements around this area are only just capable of being navigated by a push chair and wheelchair users are particularly disadvantaged by the lack of width, exacerbated by the street furniture needed for the pedestrian crossings.

11. An increase in traffic through the centre will increase air and noise pollution and inconvenience residents and tourists alike.

12. The High Street Car Park is an essential facility for the Film Theatre and, being free after 6pm, is invariably full each evening. The introduction of a 2 hour enforceable car parking limit in the Co-op car park has not helped albeit one can now, generally, find space there when the store is open to shop. There are no other convenient car parks in the centre and the on street parking is at capacity.

13. The Library has three computer terminals for residents and visitors to use (and print from) and these are all, generally, fully booked each day as job hunting and universal credit (and other services) require internet access and submission these days. It is hoped to be able to increase this for residents and visitors by moving premises and increasing space and availability.

14. Ambulance response times have been castigated by our MP and Leiston Town Council have, over many years, lobbied and engaged with the ambulance to try and improve them for IP16. It is the rural situation of the town and the distance from the A&E that, combined, would require substantial investment in people and equipment to give the necessary ability to confidently respond in time. The congestion on access roads from Ipswich caused by Sizewell C will exacerbate this.

15. The tourism offer that Leiston has, and is currently seeking to extend, revolves mainly around the historical setting and the industrial heritage that has shaped its expansion. Leiston Abbey will be less accessible with the congestion that area will see during construction and it will be a challenge to attract visitors to the centre to experience the tranquillity of the Old Post Office Square on Main Street and the Long Shop Museum.

Proposals for mitigation and partnership working

16. In our stage 2 response Leiston Town Council lobbied for support for the proposed regeneration of Leiston Town Centre as was then being drawn up in a Neighbourhood Plan. This is now complete and has been adopted.

17. Since stage 2 great strides have been made and a very fruitful partnership has been formed which operates under the banner of Leiston Together. This is a collaboration of the County, District and Town Council along with the Leiston Community Land Trust, Leiston Business Association, the Alde Valley Academy and Community Action Suffolk. It looks at various initiatives but its main aim is the careful and appropriate regeneration of the vast redundant land in the Town Centre behind Sizewell Road.

18. The main lead in this venture is the Leiston Community Land Trust. Since stage 2 they have become a constituted body with 130 members from the community, 7 of which are on the board. Leiston Town Council has a representative on the board but encourages the independent and entrepreneurial work the CLT are doing. Currently they are in discussions with housing associations to establish a partner for housing aspect of the project.

19. The District Council has purchased a large section of land needed for the project and the CLT, working with Suffolk Libraries and Leiston Town Council are working with them to help develop the civic element of the project. This would be to open an area for a small market and town square, build civic offices and a library around this (as well as other commercial aspects)

20. The elements that would help mitigate Sizewell C impacts are
    - Increase size and provision of the library for residents and workers benefit through relocation as part of the town centre project
    - Possible relocation of the job centre from an industrial estate on the outskirts back into the town centre next to the Library for ease of use (much more use expected once construction starts)
    - Relocation of the Town Council offices incorporated into a modern, community friendly hub
    - Possible relocation of Citizens Advice to be more central position and integrated with the hub
    - 24 hour toilet provision and a much needed increase in parking provision
    - Traffic management commensurate with the predicted use

21. The regeneration needs to consider various options for town centre realignment and traffic control which would allow the centre to be more pedestrian friendly, discourage through journeys, attract visitors for dwell time and increase parking. All these options could form part of the structural, economic and environmental regeneration plan currently taking shape.

22. To achieve a coherent, vibrant and attractive town centre, partnership working and substantial funding will be required.

23. The District Council have the land, the CLT are working on the housing aspects of the scheme with Leiston Together and are also looking at how to seed the civic project in conjunction with this.

24. It is considered by Leiston Town Council that a financial commitment from EDF Energy toward this project and any highway improvements would be considered a major socio-economic mitigation for the cumulative effects in Leiston that will be felt over the coming years. They would also like to see EDF Energy seek to become a partner in Leiston Together on this basis to take part in the regeneration and be a stakeholder in Leiston for the years to come.

Conclusion

25. Separate from the specific and material mitigation requests at Annex A it is strongly recommended that EDF Energy invest a proportion of their proposed Community Fund in the Leiston CLT. EDF Energy representation on the board would be most welcome to reinforce the relationship between Leiston and it's closest significant and long term neighbour and would give it an oversight of its investment. This would help support the town centre's ongoing management and regeneration and provide a major contribution to the mitigation and compensation needed to alleviate the effects of this long term project on the town.

From: [redacted]
To: SizewellC
Subject: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation
Date: 09 June 2019 19:35:46

The PC considered this application at arecent meeting and it was resolved to respond to the consultation as below:

- To recommend that the following surveys and impact assessments should be required in respect of the impact of the road and rail strategies on the parish:
  - wildlife
  - public access along rights of way
  - traffic, including the impact of traffic displaced from other roads by the increased volume of traffic to/from the development site
  - noise assessment in respect of both railway line and crossing construction works and as a result of the increased train movements proposed.

Regards
Carol Ramsden
Clerk to the Council

You have received this email from Little Bealings Parish Council. The content of this email is confidential may be legally privileged and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.
Little Bealings Parish Council ensures that email security is a high priority. Therefore, we have put efforts into ensuring that the message is error and virus-free.
Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing the content of this email.
By contacting Little Bealings Parish Council you agree your contact details may be held and processed for the purpose of corresponding.
You may request access to the information we hold on you by emailing: littlebealingspc@btinternet.com
You may request to be removed as a contact at any time by emailing: littlebealingspc@btinternet.com
Little Bealings Parish Council Privacy Notice can be viewed here: http://littlebealings.onesuffolk.net/assets/Uploads/Parish-Council-Pages/Protocols/Our-Privacy-Statement.pdf

Marine
Management
Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Major Casework Directorate
Temple Quay House
2 the Square
Bristol
BS1 6PN

Your reference: **EN010012-000670**
Our reference: **DCO/2013/00021**

By email only

20 June 2019

Dear Sir or Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

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

Thank you for your letter dated 23 May 2019, notifying the Marine Management Organisation (the "MMO") of the proposed application by EDF Energy NNB for an Order granting Development Consent for the Sizewell C Nuclear Power Station (the "Proposed Development").

The MMO's role in Nationally Significant Infrastructure Projects
The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.

The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and Northern Irish offshore waters by way of a marine licence[1]. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.

In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the Planning Act (the "2008 Act") enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences[2].

---

[1] Under Part 4 of the 2009 Act
[2] Section 149A of the 2008 Act

ENVIRONMENT ISO 14001 CERTIFIED
QUALITY ISO 9001 CERTIFIED
INVESTORS IN PEOPLE | Bronze

As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.

Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("DML") enable the MMO to fulfil these obligations.

The construction, alteration or improvement of any works (including those associated with this project) in the UK marine area, as defined by the Marine and Coastal Access Act (2009) Section 42, may require a Marine Licence from the MMO. There are a number of components within this project which appear likely to require a Marine Licence. Whilst this is the case, and although the MMO does not interpret third party legislation, there may be areas of the project which are consented under separate consenting regimes.

Further information on licensable activities can be found on the MMO's website[3]. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note[4].

In providing our response we have reviewed the following sections:
- 6.14 Coastal Geomorphology and Hydrodynamics
- 6.15 Marine Water and Sediment Quality
- 6.16 Marine Ecology
- 6.17 Marine Navigation

We have not reviewed the remaining sections as they appear to fall outside of the MMO statutory remit of licensing, regulation and planning of marine activities below MHWS in the UK Licensing area.

Notwithstanding this, the MMO reserves the right to comment on any proposed conditions included in any future DML for which the MMO will be the enforcement body.

Annex A includes the MMO's advice to EDF Energy on the Sizewell C – Stage 3 Consultation under Section 42 of the Planning Act 2008 for your reference.

Section 1: General Comments

The introductory section of the EIA scoping implies that decommissioning would be included in the assessments however there is no reference to decommissioning within any of the sections reviewed.

---

[3] https://www.gov.uk/planning-development/marine-licences

[4] http://infrastructure.planningportal.gov.uk/wp-content/uploads/2013/04/Advice-note-11-v2.pdf

Table 3.2 in section 3.11 outlines areas of development that have been introduced since the 2014 EIA scoping report. We are in agreement with the decision to scope these newly introduced offsite developments out of the coastal geomorphology and hydrodynamics, marine water and sediment quality, marine ecology and marine navigation assessments (sections 6.14, 6.15, 6.16 and 6.17 respectively).

The MMO welcomes further information on the design of the Coastal Defence Feature (CDF), Beach Landing Facility (BLF), Cooling Water (CW) infrastructure, Fish Recovery and Return (FRR) systems and Combined Drainage Outfall (CDO). Whilst we note that discussions are ongoing between MMO and EDF Energy NNB at a technical level regarding some of these structures, we recommend that the 'Rochdale Envelope' approach should be adopted in order to assess 'worst case' impact scenarios.

With regards to the CDF, although designed to be above MHWS and therefore outside of the jurisdiction of the MMO, we anticipate that with rising levels it may fall below MHWS during the operational lifetime of the project. We will continue to engage with EDF Energy NNB to provide recommendations on how this be considered within the DML.

It is noted that construction of the BLF, CW infrastructure, FRR and CDO will require dredging and/or disposal, depending on the elected method. Under the convention for the Protection of the Marine Environment of the North-East Atlantic (the "OSPAR convention"), material produced during the drilling installation, seabed preparation and drilling mud, if disposed of to sea, must be disposed of within a licenced disposal site:

a) If the material is disposed of at an existing licenced disposal site, this must be agreed in writing with the MMO and the site must be named (including reference number and coordinates) in the DML which forms part of the DCO.

b) If the intention is to dispose of material inside the Sizewell red line boundary then the site must be characterised. This should be done by completing a site characterisation report which should;

- Assess the need for a new disposal site and consider alternative uses;
- Outline the disposal volume (worst case) (including drill arisings);
- Provide evidence of the material characteristics (i.e. % of sand/gravel/chalk/clay etc.). This can be done by providing data from geotechnical investigations;
- Assess the impact of disposal on marine receptors i.e. impact from increases in suspended sediment concentration, sediment plume, contamination etc; and
- Provide evidence that the material has been characterised at depth, i.e. data collected is from an equal if not greater depth than the disposal material.

This information must be provided in order to designate Sizewell C Nuclear Power Station as a disposal site, provide a reference code for OSPAR reporting purposes and for the disposal site to be included in the DCO/DML. It is recommended that Natural England is also consulted on this document when provided to the MMO. Early engagement with the MMO is recommended to ensure the characterisation report provides us with all the required information.

Much of the above information may be provided in the Application to the Planning Inspectorate; however, it should also be presented in the report and described in the context of the disposal of the worst case volume of material.

It should also be noted that if disposal is to be licenced under the DCO there will be a requirement to add a condition to submit biannual disposal tonnage returns forms to the MMO. There may also be additional conditions applied depending upon the outcome of the assessment.

Please note that it is possible to apply for a separate disposal licence if desired, however the impacts of disposal must still be assessed within the Environmental Statement (ES).

Notwithstanding this, please see below our response with section specific comments surrounding the EIA Scoping Report as it has been presented so far.

Section 2: Specific comments

Volume 1 Development Proposals	
Section 6.4 Noise and vibration	
It is noted that the potential impacts of noise and vibration on marine features are not discussed within this chapter and are instead included within section 6.16 Marine Ecology.	
Section 6.14 Coastal Geomorphology	
6.14.7 - .8 Study area	The study area outlined for the purpose of considering longshore sediment transport has been refined since the 2014 EIA report. . The 2019 document defines the limit as MHWS with a note that there might be circumstances where the boundary is at the Highest Astromical Tide. The southern limit is also reduced (limited at Thorpeness) with a note that the sediment plumes may extend south of this. We recommend that a simplified view of the study area is considered. We also note that although the nett drift, averaged over a 10 year period, is towards SZC at Thorpeness and north of Sizewell, this does not automatically exclude the possibility of their being any impacts outside of the sub cell.
6.14.11 Baseline	Conditions in the Sizewell Bay during the early 20th century are described in the report where wide areas in the bay experienced high rates of persistent erosion or accretion. We recommend that whilst the current geomorpholigical baseline is a fluctuating pattern of erosion and deposition with low transport rates, the future baseline should consider the risks of the system reverting to the previous baseline seen.
6.14.15 Further studies	The 2014 EIA Scoping Report proposed modelling shoreline change as well as the detailed modelling around the structures. Shoreline change modelling is no longer mentioned in the EIA scoping document although some Xbeach modelling has been undertaken. If shoreline change modelling is no longer going to be used, an alternative approach to modelling shoreline change in the wider bay area would be expected.
6.14.16 Modelling	This paragraph states that detailed modelling is not needed for assessment of impacts on coastal geomorphology. Futher justification should be provided to support this statement.
6.14.28	There is no mention of any potential effects on waves from any change in bathymetry associated with the sediment ploughed to the

	side or of effects of maintenance dredging of the BLF dredged area.
Section 6.15 Marine Water and Sediment Quality	
6.15.6 Survey and assessment	The baseline survey is described in 6.15.6 as occurring between February 2014 and January 2016, but in 6.15.10 as occurring between February 2014 and Janurary 2015. The correct date should be clarified.
6.15.37	This section refers to the assessment of 'thermal barriers to fish movement in an estuary'. We recommend the inclusion of an explanation of how this approach will be applied to a coastal site.
Section 6.16 Marine Ecology	
6.16.41 - .45 Construction	We understand that the requirement for an Unexploded Ordnance ('UXO') Disposal Campaign has not been ruled out (i.e. to prepare corridors for the intake and outfall headworks and potentially other marine activities). We recommend that if this cannot be ruled out, that potential UXO locations and corresponding likely marine ecology impacts be considered.
6.16.46 - .51 Operation	The Sizewell area experiences seasonal spring blooms of jellyfish and ctenophores. We recommend that the risk of jellyfish blocking the system be considered as well as the means to unblock it. We also recommend that the impact of high densities of jellyfish and ctenophores on fish and any crustaceans in transit be considered.
Section 6.17 Marine Navigation	
6.17.6 and 6.17.14 Further surveys/studies	We welcome the intention to complete an additional (14 day) marine traffic survey in June/Summer 2019.
6.17.19 Potential impacts during operation	We recommend the potential disruption to fishing and recreational activites also be considered within the operation phase of the development. This should include consideration of impacts arising from use of the BLF and any vessels used to undertake dredging.

Section 3: Conclusion

The MMO note that work is ongoing with regards to the final designs for some of the elements of the proposed development and welcome the ongoing consulation with EDF Energy with regards to these elements.

The MMO also recognises that work is still ongoing to assess potential impacts;we reserve the right to to make further comments on this application throughout the process and to modify our present advice.

We will continue to work to engage with EDF in order to provide pre-application advice around the content of the draft Marine Licence which, whether 'deemed' or standalone, will the basis of our regulatory interest in the project.

Your feedback
We are committed to providing excellent customer service and continually improving our standards and we would be delighted to know what you thought of the service you have received from us. Please help us by taking a few minutes to complete the following short survey (https://www.surveymonkey.com/r/MMOMLcustomer).

If you require any further information please do not hesitate to contact me using the details provided below.

Yours Sincerely,

[redacted]

Marine Licensing Case Officer
T: 0208 026 5097
E: [redacted]

Copies to:
Edward Walker (Marine Licensing Senior Case Manager, MMO)
Eva Szewczyk (Marine Licensing Case Manager, MMO)

Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Dr Stephen Roast
EDF Energy
90 Whitfield Street
London
W1T 4EZ

Our reference: DCO/2013/00021

[By email only]

28 March 2019

Dear Dr Roast,

SIZEWELL C NUCLEAR NEW BUILD STAGE 3 PRE-APPLICATION CONSULTATION, SECTION 42 OF THE PLANNING ACT 2008: REVIEW OF THE CONSULTATION DOCUMENTS (DATED JANUARY 2019)

This letter constitutes the Marine Management Organisation (MMO) response to the request received on 07 January, for comments on the Stage 3 Pre-Application Consultation Documents: Volume 1 Development Proposals, Volume 2A & 2B Preliminary Environmental Information and Volume 3 Preliminary Environmental Information Figures (all dated January 2019). The documents provide technical and preliminary environmental information and aim to explain how this information is informing emerging strategies and proposals for the project under section 42 of The Planning Act 2008.

We welcome the opportunity to provide further comments on the pre-application documents and acknowledge that a number of areas we have commented on previously have been considered by EDF. However, we also recognise that there are limitations to the information provided including a number of areas where we require additional information. We have expanded on these areas in full below.

The MMO, and other members of the Department for Food and Rural Affairs (Defra) group – The Environment Agency (EA) and Natural England (NE) - recognise the complexities involved with a project of this nature and will seek to engage with you further to ensure that our requirements and interests are effectively represented.

In providing our comments we have reviewed the following chapters:

Volume 1 Development Proposals: Chapters 1, 3-7
Volume 2A & 2B Preliminary Environmental Information: Chapters 1-2, 13
Volume 3 Preliminary Environmental Information Figures: Chapters 1-2

Our comments can be found below.

We have not reviewed the following chapters as they appear to fall outside of the MMO statutory remit:

Volume 1 Development Proposals: Chapters 2, 8-17
Volume 2A & 2B Preliminary Environmental Information: Chapters 3-12, 14
Volume 3 Preliminary Environmental Information Figures: Chapters 3-12

In drafting our response, consultation has taken place with the local MMO office based in Lowestoft. Their comments have been used to inform our response and provide wider background on commercial fishing activity within the area local to the proposed development site.

The MMO reserves the right to make further comments on this application throughout the process and to modify its present advice. We also reserve the right to comment on any proposed conditions included in any future Deemed Marine Licence (DML) or standalone Marine Licence for which in both cases, the MMO will be the enforcement body.

Section 1: General Comments

1.1 There has been some progress since the second consultation to which we responded in February 2016. For example the marine-led transport strategy, which involved the use of a Marine Offloading Facility ('MOLF') has been removed from proposals in favour of either a rail-led or a road-led strategy. Whilst we appreciate this is an important update to the proposals, it is noted that there are still a number of marine elements that require in-depth consideration; the transition to a more terrestrially-driven strategy should not detract from the remaining marine elements The MMO will continue to provide pre-application advice as options are refined.

1.2 Chapter 7 of Volume 1 of the Development Proposals outlines the proposals for the main development site. However, there should be a clear summary and indication of all the infrastructure together (both marine and terrestrial) so that the works are clear. For example, the Fish Return and Recovery system (FRR) is not described here. The marine area of works is broadly identified later but the complete area of works should be clearer from the outset.

1.3 We note the requirement for a number of activities within the UK Marine Area (Section 42, Marine and Coastal Access Act 2009 – 'MCCA') which are summarised in 7.1.2 of Volume 1 of Development Proposals. It is noted that this includes the construction of the Beach Landing Facility (BLF), cooling water infrastructure and Combined Drainage Outfall (CDO). It is our understanding that these activities will require dredging and disposal of arisings, depending on the elected method. Depending on the method elected, dredging and disposal itself may constitute a Licensable Activity (as defined by Section 66, MCAA). Under the Convention for the Protection of the Marine Environment of the North-East Atlantic (the 'OSPAR' convention), material produced during the drilling installation, seabed preparation and drilling mud, if disposed of to sea, must be disposed of within a licenced disposal site.

If the material is disposed of at an existing licenced disposal site, this must be agreed in writing with the MMO and the site must be named (including reference number and coordinates) in the DML which forms part of the Development Consent Order (DCO). We would therefore strongly recommend that the disposal site form part of the DML/DCO.

Outside of the statutory consultation process, we continue to engage with SZC Genco to discuss the content of this DML.

If SZC Genco wish to propose the use of a new disposal site, the site must be characterised. We wish to again re-emphasise our previous comments that this can be a complex and lengthy process. If required, a Characterisation Report should:

- Assess the need for a new disposal site and consider alternative uses;
- Outline the worst-case disposal volume (including drill arisings and other disposals);
- Provide evidence of the material characteristics (i.e.percentage composition of sand, gravel, chalk and clay etc.). This may be informed by data from geotechnical investigations;
- Assess the impact of disposal on marine receptors (i.e. impact from increases in suspended sediment concentration, sediment plume, contamination etc)and;
- Provide evidence that the material has been characterised at depth(i.e. data collected is from an equal if not greater depth than the disposal material).

This initial list is not exhaustive and as above, the MMO welcome further engagement with the proponents of the project to discuss further.

Much of the information above may be provided in support of a disposal site within the DML (itself within the DCO application); however, it should also be presented in the report and described in the context of the disposal of the worst case volume of material. This is an important point; without considering dredging & disposal, the 'worst case' envelope – in terms of marine impacts – is not fully explored.

As with other marine licensable activities, the MMO may seek to apply conditions to the DML. With respect to dredging & disposal – if required – this is likely to include but is not limited to biannual disposal tonnage returns, periodic sediment sampling and water quality assessments. As with other licensable activities on the DML, the MMO welcome further engagement with SZC Genco.

Where SZC Genco has identified the requirement for a Marine Licence, this can be secured via a DML or 'stand-alone' Marine Licence Application. We wish to strongly emphasise our preference for the inclusion of licensable activities in a DML in order to ensure the assessment and future regulation of the project is as efficient as possible.

1.4 Although a contents page has been provided for the consultation documents, a more detailed contents that outlines the structure of each chapter (or alternatively a contents at the start of each chapter) would facilitate review of the relevant information.

Section 2: Specific comments

Volume 1 Development Proposals	
Chapter 1 Introduction	
1.2.2	It is not clear why the marine-led transport strategy was discounted. It is suggested that measures to reduce the impact of constructing a jetty on the marine environment 'would not fully address' the issues and would also 'significantly increase the overall time taken to construct the power station'. For those reviewing the documents, it would be beneficial to understand why this decision was made.
1.3	There is still no reference to the East Marine Plans or Marine Policy Statement. Marine Planning is a statutory requirement; Marine Plans, where they are adopted, must be used in all planning decisions for the sea, coast, estuaries and tidal waters as well as developments that impact these areas, such as infrastructure. In areas where a Marine Plan has not yet been formally adopted, planning decisions for the marine area must take into account the UK Marine Policy Statement (MPS). The Marine Policy Statement includes a summary of national policies relevant to marine planning and decision-making in the marine areas. Information on Marine Plans can be found online at https://www.gov.uk/topic/planning-development/marine-planning Information on the MPS can be found online at https://www.gov.uk/government/publications/uk-marine-policy-statement
Chapter 3 Planning Policy Context	
3.1 – 3.7	As above; there is a discussion of National Policy Statements, National Planning Policy Framework, Local planning policy, but no mention of the East Marine Plans or Marine Policy Statement.
Chapter 4 Socio Economic Strategy	
4.1 – 4.7	There is no mention of potential impacts on commercial fisheries in the Sizewell area (this is however discussed further in Vol 2a 2.16.). The MMO is aware of some local fishing effort in the vicinity of the Sizewell C proposed development site; whilst limited in scale and extent, it should be clear that it is being considered.
Chapter 5 Transport Strategy	
5.1.6	It is noted that the MOLF jetty is no longer proposed and that a BLF is present in both remaining strategies. The BLF is proposed for use: - Throughout the construction phase for the delivery of Abnormal Indivisible Loads (AILs) - During the operational phase to remove heavy and oversized loads from the road network However, there is little detail provided covering the construction methodology of the BLF. This should be refined in future documentation such that the broad details of the BLF construction are clear.
5.4.3	We note the comment that based on 'learning from Hinkley Point C where the construction of a jetty has proved challenging', the marine-led strategy has been discounted. More site-specific data and discussion around the key reasons for the decision would be useful to support this

	justification.
5.4.4 – 5.4.7	It is noted that some justification for not continuing to consider the marine-led strategy is provided. This includes piling and resulting noise, habitat loss and seasonal restrictions. However, there appears to be lack of evidence to support these statements. Moreover, it remains unclear that these impacts will not be created by the project (i.e. as a result of the remaining marine aspects of the project such as the BLF and / or the intake and outfall tunnel headworks).
5.4.8	It is stated that 'the barge would be loaded with AILs at a transhipment port, towed to the Suffolk coast, moored in position and the barge beached. AILs would then be transported to site by trailer along an access road'. There is very limited information on the operation of a barge including a lack of detail on potential impacts from vessel noise and traffic. It is noted however that the navigational impacts have been addressed to an extent in Vol 2a 2.18. Environmental impacts specific to the repeated beaching are also not considered. This should be refined in further documentation such that impacts from the barge are clearly presented.
Chapter 6 Traffic Modelling	
6.1 – 6.6	It would appear that only land-based traffic has been analysed and modelled, despite the proposal to use the BLF in both construction and operational phases. Marine-based traffic should also be considered; if and where this is thought to be negligible, the evidence-based argument should be clearly presented.
Chapter 7 Main Development Site	
7.4.69 - 7.4.77 Northern mound	Clarification is required on whether the Northern mound would be removed and rebuilt at the same location i.e. above MHWS.
Table 7.3 Potential redevelopment of the Northern mound.	The source of the information to support the following statement is unclear; 'Further studies have shown that it is likely to require rebuilding to a higher specification to help withstand risks from both earthquakes and coastal flooding'.
7.4.78 - 7.4.81 Sea defence	The final design and the position of the hard and soft coastal defences in relation to MHWS remains unclear. It is also not possible to comment on their long-term suitability with the information currently provided. For instance, whilst the MMO appreciate the high-level depictions in Figure 7.21, the full details of the feature are unclear. It would be useful to understand key matters such as depth of the Hard Coastal Defence Feature (HCDF) toe, it's penetration into the earth and laterally, underneath the Sizewell frontage. Whilst we understand the HCDF is designed to protect against extreme events and future changes, it is also important to understand interaction between the seaward-most aspects of the HCDF and the sea. In particular, we note that later in the Preliminary Environmental Information (PEI) report (2.14.12), it is suggested that the HCDF will interact with coastal geomorphology receptor. We suggest that the final HCDF is clearly presented alongside a high-level review of its impacts and resilience which should be supported in technical detail

	within the PEI / Environmental Statement (ES). The use of a Soft Coastal Defence Feature (SCDF) should also be made clear in the context of wider sea defences; at the very least, a high-level reference to its construction & 'operation' should be provided. Additionally, the positions of the hard and soft coastal defences should be made clear so that the requirement for inclusion on a marine licence can be best understood. Where any future maintenance activities are required over the lifetime of the project, it may be that a marine licence (whether deemed or standalone) can be used to deliver maintenance works.
7.4.82 - 7.4.84 Cooling water infrastructure	There is very limited information provided in relation to the proposed cooling water infrastructure, both in construction and operational phases. We also note that this section of the report is actually less insightful than the previous Stage 2 consultation, which at the time included some - albeit limited - consideration of environmental and ecological impacts (7.4.52 – 7.4.56). Substantial time has elapsed since the previous Stage 2 consultation and the evolution of the station proposals – from a cooling water perspective – should be presented. This should be accompanied with an updated summary of environmental and ecological understanding around impacts and likely mitigation. Perhaps most significantly, we note that 7.4.82 – 7.4.84 is also now lacking in reference to mitigation which was previously cited in relation to marine ecology (Stage 2 main consultation report – Section 7.4.56). If SZC Genco is no longer proposing this element, it should be addressed transparently with justification.
7.5.105 Combined drainage outfall (CDO)	There is limited information provided on the proposed CDO, both in construction and operational phases. This should be developed such that a 'worst-case' envelope is provided for impacts both during construction and operation.
7.5.91 - .98 Beach landing facility	Some justification has been given for choosing the BLF over the other options. However, it is not clear whether the impacts have been fully considered in order to come to the conclusions reached; it is unclear how impacts between the BLF and the wide jetty would differ. More information is required on the proposed used of the BLF and the potential impacts to other users of the area (including beach and sea users).

Volume 2A & 2B Preliminary Environmental Information (PEI)	
Chapter 1 Introduction to PEI	
1.1.1 – 1.1.3	There is no reference to The Marine Works (Environmental Impact Assessment) Regulations 2007. Consideration must be given to all relevant environmental legislation (not just EIA). This must include consideration of any recent changes to relevant environmental legislation and/or where impacts may have changed due to project changes.
1.1.3	In citing The Planning Inspectorate's Advice Note Seven, the PEI report states that a 'good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development'. Whilst we appreciate the need for the PEI to cater for a range of audiences, the PEI does not enable us to fully understand the project's likely environmental effects. Most notably, this is with relation to Marine Activities including dredging and disposal; Marine Piling (if required) and site drainage. We have expanded on the areas where we see the PEI lacking below and emphasise our willingness to engage with SZC Genco to refine the information.
1.5.1	The 25 Year Environment Plan (published in 2018) confirms Government's move to embed an 'environmental net gain' principle for development. The vision for the project does not mention opportunities for environmental enhancement nor does it appear to be considered elsewhere. It should be ensured that biodiversity net gain is considered where appropriate.
1.5.2	The report cites the example of the MOLF removal and its associated reduction in effects on Marine Mammals and local sediment movements. While this may be accurate, there are aspects of the marine works which may continue to result in significant impacts (e.g. underwater noise and increased sedimentation).
Chapter 2 Main Development Site PEI	
2.1.1	Given the detail provided for the other areas of the proposals, we find the coverage of 'marine works and associated infrastructure' lacking in detail. We acknowledge that this is a high-level summary however it would benefit from an overview of the key marine activities (i.e. intake and outfall tunnels, headworks, Fish Recovery and Return System; Dredging). EDF may wish to consider grouping marine activities into their own sub-section.
2.2.22	The HCDF (and some of the BLF access road) appear to be largely outside of the MMOs legislative remit in that they are located above MHWS. However, our understanding is that the access road being incorporated into the HCDF was designed to reduce impacts from an additional haul road. This may be worth consideration here.
2.4 Amenity and recreation	Mitigation to reduce impacts to users of the beach appear to offer practical solutions including measures to mitigate impacts from noise and visual disturbance. As the proposals progress, it is expected that further information would be made available on the number and extent of the beach closures required during the construction phase.

	Additional detailed information is also required on the construction and final footprint of the BLF. As this feature will likely restrict access to the marine environment, it has the potential to be a contentious area.
2.7 Noise and vibration	This is an almost-wholly terrestrially-focused section of the report and we are unaware of any mention of marine features within this section; this is despite there being activities proposed within the marine environment which may lead to Noise and Vibration impacts. In the case of the MOLF, we understand that the removal of this feature from proposals led to a large reduction in likely piling requirements. However, a BLF remains a requirement of the project; the MMO understands this structure will require piling operations and on this basis, associated noise and vibration impacts must be considered. It may be the case, pending investigation, that the impacts are not significant (due for instance to piling being confined to shallow waters, the local substrate being of limited resistance and campaigns being short). However, an evidence-based assessment needs to be made. This evidence-based assessment and consideration should also be carried out for other potentially disruptive marine activities. For example, we understand that intake and outfall headworks will be required in deeper waters seaward of the Sizewell-Dunwich Bank. Where these activities have the potential to require piling works, Noise and Vibration effects may be significant. Additionally, we understand that the requirement for an Unexploded Ordnance ('UXO') Disposal Campaign has not been ruled out (i.e. to prepare corridors for the intake and outfall headworks and potentially other marine activities). The PEI should be expanded to consider potential UXO locations and corresponding likely marine-noise impacts. This should be best-considered against current scientific understanding around sound propagation and impacts to species. In addition to construction-based Noise and Vibration, the MMO expect to see further consideration given to marine-based impacts arising during operation. Overall, Marine Noise and Vibration should be considered further and a worst-case 'Rochdale Envelope' approach should be taken. This should be followed in order to ensure any likely activities and their effects are considered in the ES.
2.9 Geology and land quality	There is only limited reference to marine features; it would be useful to understand coastal geology and in particular, known areas of marine-risk with which licensable activities may interact.
2.12.15 Climate projections	The report states, in relation to UKCP18, that 'some of the assessments may need to be updated based on the new [climate change] projections'. Flood risk assessment and permitting is an area of primary interest for the EA. However, we wish to emphasise our position that all assessments must be made resilient in light of UKCP18.

2.13 Traffic and Transport	Given the areas of primary interest for the MMO, a substantive review of this section has not been carried out. However, it is noted that is predominantly terrestrially focused and there does not appear to be any consideration of marine transport impacts. This should be considered in terms of volumes, frequency and duration of vessel movements and impacts on local marine traffic.
2.14 (and supporting figure 2.14.1) Coastal geomorphology and hydrodynamics	We welcome the presence of supporting figure 2.14.1 (and 2.12.5 and 2.16.1) which together assist with a high-level understanding of the coastal environment. However, at this stage, the PEI – and supporting figures – should present evidence to clearly indicate how conclusions have been reached. For example, we note several comments in the chapter around erosion, historical stability and areas of particular vulnerability etc. Understanding the baseline conditions – and existing areas of weakness – would be greatly assisted with additional figures and supporting data. We recommend that a similar approach is used to help depict impacts from the project.
2.14.2 Baseline environment	We are uncertain that the baseline environment (2.14.2 – 2.12.11) is a complete depiction of existing conditions. For example, it would be useful to know how and if SZC Genco has considered prevailing storm currents, wind, waves / incident wave angle etc. This would help to frame subsequent considerations of areas of particular vulnerability along the Sizewell Frontage.
2.14.4 Coastal geomorphology and hydrodynamics	Only terrestrial sites appear to have been listed. For example neither the Outer Thames SPA nor the Southern North Sea cSAC are included. Both sites encompass the marine area adjacent to the proposed site. If there are no anticipated impacts on those sites, then this should be clearly stated along with some justification for such conclusion.
2.14.12 Environmental design	The report references a number of development components that would 'potentially have significant effects on […] coastal geomorphology'. This includes the BLF (and associated dredging), CDO, FRR, SCDF / HCDF. However, the report does not include any reference to intake or outfall headworks and required dredging. As figure 2.14.1 indicates, the likely locations for headworks are within close proximity to the Eastern-most extent of the Sizewell Dunwich Bank. Given the importance of the Sizewell Dunwich feature, we strongly encourage EDF to consider coastal geomorphological impacts both initially and during operation arising from the headworks.
2.14.14 - 17 Beach landing facility	Whilst we understand that the dredging pocket detailed in 2.14.1 is likely to be indicative at this stage, we request further clarification that the worst-case beaching area is being considered by SZC Genco. We note that the pocket is approximately 150m x 75m which may be conservative given the likelihood that the BLF will be operated in a range of sea states and potentially with assistance from support vessels operating in and around the pocket. We welcome proposals to minimise dredging depths however request additional information (supported with figures) which clearly depicts the dredging pocket and its worst-case maximum extent. This should also identify the volumes of sediment anticipated for removal.

	2.14.17 does correctly identify the likelihood that dredged sands would remain 'close to the bed' and that there would be 'no net loss of sand from the longshore bars'. Whilst this may be true, the potential environmental risk may relate to long-term areas of increased depth and exposure in both the inner and outer longshore bars. As above, the dredging pocket must be considered in terms of its potential to influence coastal processes during construction and operation. We note the coverage of bed shear stress in section 2.14.24 – 2.14.28; data and modelling to support these conclusions is required. Outside of the public consultation, the MMO continue to engage with SZC Genco around the content of the DML; it is likely that monitoring and management conditions will be required in light of the risk raised above.
2.14.19 Coastal defence features	Whilst coastal defence features (CDFs) are said to be built on land above MHWS, clarity is required whether this relates to soft or hard defences (or both). Evidence is required to support the conclusions as well as more information on long-term effects; there is no assessment of the potential impacts of the current design and location on coastal processes during construction and operation. Additional information would be required in the case of the CDFs being moved seaward i.e. below MHWS.
2.14.21 - .28 Coastal geomorphology and hydrodynamics	More evidence is required to support the conclusions reached on the impacts from dredging and the BLF's temporary rock platform including assessment/ modelling of the impact on coastal processes.
2.14.35 Progressive erosion of the SCDF	There is insufficient information provided on the SCDF. In particular, the MMO is interested to understand the source of sediment to feed the SCDF and how SZC Genco intend to provide assurance of sediment match in the context of the local sediment (i.e. receiver site). We are also interested to understand whether this material will be won locally or brought in from elsewhere; section 2.14.19 references 'beach grade sediments' yet we are unaware of any confirmed borrow pit arrangement (as has been adopted at other EDF operational stations such as Dungeness). Finally, in commenting upon progressive erosion of the SCDF, sections 2.14.34 – 2.14.35 comment on the perpetual release of sediment to the longshore transport system. We understand SZC Genco plan to bond sediment on the landward SCDF itself in such a way as to achieve a match with local sediment. However, the report implies that material entering the longshore transport system over time would be similar to material which is naturally available there. Presumably the properties of material intended for retention on the SCDF are different to those of the frontage itself. This therefore suggests there is potential for poor sediment cohesion and unintended impacts on local sediment transport. Clarity on this matter is welcome.
2.14.55	This section of the report states that the 'assessment of shoreline

Shoreline recession and the HCDF	recession leading to exposure of the HCDF, and the likely impacts, is ongoing and will be used to refine the coastal geomorphology assessment in the ES'. We welcome this commitment; it is very important to understand how, over time, the HCDF will begin to interact with the future baseline of the Greater Sizewell Bay.
2.15 Marine water and sediment quality	Additional information is required on the impact of chlorination, the discharges from the CDO and the location of the FRR. Given the scope and nature of this theme, we anticipate detailed discussion to take place between Defra family and SZC Genco directly. Outputs from this process should be used to inform the next iteration of the Environmental Information (either PEI or EA format).
2.15 Marine water and sediment quality	The report identifies a range of individual pressures on water quality during both construction and operation. It is currently unclear how in-combination effects on water quality are being considered by SZC Genco. Whether delayed or in series, the range of marine activities may present water quality risks when considered in-combination. By way of example, dredging (for the BLF, intake and outfall headworks), piling, CDO discharges and – for instance - Tunnel Boring Machine Drilling all present individual potential pressures on water quality. Whether these activities are taking place together or in separated sequence, they may present impacts that when considered in-combination, do have significance. SZC Genco should ensure that a thorough, worst-case assessment of water quality pressures is carried out.
2.15.1 – 2.15.6 Marine water and sediment Quality; baseline environment	The report characterises – at a high level – the water quality environment of Greater Sizewell Bay. Where conclusions are reached around water quality baseline, these should be fully reinforced with evidence and data to corroborate the comments made by SZC Genco.
2.15.8 Development components	For completeness in presentation, we recommend identifying the requirement for dredging (both capital and ongoing maintenance) as part of the project. While we appreciate dredging may be a constituent part of the BLF, Cooling Water system, CDO etc., it has its own suite of water quality impacts. We have provided detailed comments below however the consideration of dredging is generally lacking in relation to Section 2.15. As and when further detail is supplied, it may be advantageous to consider dredging as a 'component' from the outset.
2.15.11 Navigational dredging 2.15.23 - 27 Construction: Dredging	Substantial further consideration is required surrounding the proposed dredging and potential disposal operations and their potential impacts on the marine environment. At present, the information is lacking. **Waste Framework Directive** Should disposal be required, SZC Genco should clearly demonstrate the rationale behind the proposals to dispose of material to sea. This should include a consideration of the other potential options surrounding the fate of the material, including potential re-use. Under the Waste Framework Directive - Directive 2008/98/EC on waste - disposal should should be the last option. Should the project be consented, it is likely that there would be an ongoing requirement to

	consider this matter on an ongoing basis. **Volumes** We recognise the generally high-level nature of the document however, the PEI should include an indication of volumes required for each campaign related to the various different marine components. As the report implies at 2.15.24, the extent of each campaign is likely to vary considerably depending on which feature is being supported. Overall, volumes should be based on a worst case scenario and include suitable disposal to sea options for dredge arisings. **Contaminant Concentrations** It is unclear what, if any, verified evidence there is regarding contaminant concentrations and radionuclide concentrations in areas where dredging is required. For example, Section 2.15.27 states that 'sediment-bound organo-metal and polyaromatic hydrocarbons concentrations within the [Greater Sizewell Bay - GSB] are below Cefas Action Level 2 and the material is coarse in nature'. The report concludes that on this basis, the 'sediment material is acceptable for disposal at sea'. The Centre for Environment, Fisheries and Aquaculture ('Cefas') data underpinning these conclusions should be clearly cited and attached as annex material. In the absence of insight into this, we are unable to confirm our agreement with the conclusions and cannot give comment on its suitability to inform this stage of the consultation. It is worth noting that if a DCO were to be granted for the proposals, further sampling (planning and / or analysis) would be a requirement of the DML. **Contaminant Characterisation** Further to our comment above and again in relation to 2.15.27, the report refers to the GSB in general terms, for example: 'polyaromatic hydrocarbons concentrations within the GSB are below Cefas Action Level 2'. The MMO does understand that sediment may be of a widespread comparability in the GSB (for instance, in relation to Particle Size Analysis or generally with regards to nutrient loading). However, the individual chemical properties associated with each proposed dredge area are likely to vary and this is yet to be confirmed. Future environmental information should clearly indicate the sampling regimes that have been carried out for each area. This should include sample locations, depths and extraction dates / dates when any analysis has been undertaken. **Mobilisation of Sediment** Some sections of the report (such as 2.15.24) refer in high-level terms to increases in suspended sediment concentration (SSC) and the movement of sediment plumes associated with dredging campaigns. However, it is necessary to fully understand the environmental risks associated with the remobilisation of sediment across the site. From a water quality perspective, this should be a holistic approach which considers the worst-case envelope. An understanding of the worst-case SSC impact should be informed by detailed modelling of various

	dredging and disposal scenarios which phase between time-separated dredging, simultaneous dredging and ongoing periodic campaigns). Furthermore, we request that the conditions and parameters used to inform plume modelling (cited in 2.15.24) be provided. If available, it would be helpful to the reader to review the modelling outputs in graphical format via an annex.
2.15.23 Capital dredging	As we have noted in Section 1 (General Comments), if disposal on-site is required, characterisation of a licenced disposal site is likely to be a lengthy process.
2.15.30 Water removal	This section does not appear to be reinforced with details of likely contaminants, indicative volumes or durations of exposure to the water body. Additional evidence should be supplied and we recommend engagement directly with the Environment Agency for whom this is a key area of interest.
2.15.44 Mitigation	As discussed above, sufficient information has not yet been provided on volumes, contaminant concentrations of sediments, sediment sampling regimes or the conditions and parameters supporting plume models. Thus, although proposed mitigation appears to be appropriate, it is not possible at this stage to assess whether it is sufficient to address potential risks to marine water and sediment quality.
2.16 Marine ecology and fisheries	A number of development components have been identified within this section that have the potential to impact on the marine environment (2.16.33). It is generally noted that additional detailed information is required on these components; it is considered likely that these components will be a source of concern within the local fishing community (commercial and recreational) during both the construction and operational phase.
2.16.2 Marine designations	It is noted that the marine designations noted previously as being omitted are included here. They should still be included in the earlier list of designated sites for transparency, as outlined in 2.14.4.
Table 2.16.3 Fish (noise sensitive species)/ Marine Mammals.	It appears that the conclusion of the assessment of effects has been reached prior to noise assessments being completed; this appears premature.
2.16.19 Commercial fisheries	There are concerns over using the MMO data for under 10 landings as a basis to assess commercial value of fisheries off the Sizewell coast. The majority of vessels operating out of Aldeburgh, Orford and Sizewell sell a significant portion of their catch directly to the public through quayside or beach shops. This activity is not recorded by the MMO hence the value of the fishery in the local area is greater than the MMO data would suggest. Consequently, the potential impacts can be more significant than indicated and more detailed information on fisheries is required to support the proposal.
2.16.21 Whelk	As per the advice obtained through consultation with the local MMO office, please note that the main species targeted by the local inshore fleet are bass, rays, herring, sprat, soles, cod (diminishing numbers), crab, lobster and whelk. Whelk (*Buccinum undatum*) have recently become a far more important commercial species than in previous years: its sale price has remained steady and since they are locally abundant, this resulted in

	an increase in whelk fishing across the area. This should be taken into consideration when assessing potential impacts on fishing activity.
2.16.36 Beach landing facility and traffic 2.16.40 Vessel traffic and pollution	The effect on access to the beach and sea and the potential impacts on local vessels (both recreational and commercial) should be considered. As per comments on 2.4, additional detailed information is required on the construction and final footprint of the BLF. This feature will likely restrict access to the marine environment and therefore any fishing activity (both recreational and commercial) in its vicinity. It has been noted by the local MMO office that those fishing from the beach at Sizewell often operate very close to shore.
2.16.37 Piling noise	'Best environmental practice' is referred to in terms of piling activities. In order to understand underwater noise and vibration and to implement suitable mitigation strategies, there is now a reliable precedent for the application of the Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing Underwater Acoustic Thresholds for Onset of Permanent and Temporary Threshold Shifts (NOAH guidance) (July 2016). Mitigation measures may include soft-start procedures, scare charges, marine mammal observations and vibro-piling. The efficacy of the appropriate measures to reduce impacts should be assessed and supported with evidence.
2.16.39 Navigational dredging	As per comments above on 2.15.11 and 2.15.23-.27, substantial further consideration is required to support any dredging activities and potential disposal operations. This includes an indication on volumes, contaminant concentrations and where disposal to sea is required, sediment sampling may also be required at the disposal site location. In addition, further information is required on dredging volumes, material type or methods.
2.16.41-.43 Cooling water infrastructure and fish recovery and return	There are no details relating to the use of acoustic deterrent devices. These are however mentioned within table 2.16.3. Consequently, further evidence is required to demonstrate that potential impacts relating to entrapment, entrainment and impingement, have been fully assessed.
2.16.46 Preliminary assessment of effects	There does not appear to be any consideration of disturbance associated with either construction or operational phases of the proposal. Impacts from noise and vibration on marine features are not discussed within '2.7 Noise and vibration' and there appears to be limited reference within this section. It is noted that there is some consideration of underwater noise on potential receptors.
Chapter 13 Project Wide Cumulative PEI	
13.6 Project-wide effects Table 13.5 Potential for significant project-wide	As per comments on 2.15, it is currently unclear how in-combination effects on water quality are being considered by SZC Genco

effects	

Volume 3 Development Proposals	
Chapter 2 Main Development Site PEI Figures	
Figure 2.7.3 Construction noise phase 1 Figure 2.7.4 Construction noise phase 2	It is noted that this data is intended to provide supporting PEI figures. However, it is not clear how it has been modelled since the construction methodology of marine infrastructure elements (particularly relating to piling in deeper water where sound propagation is higher) remains unconfirmed. In addition, the map only covers the terrestrial extent of the project and does not extend to include the marine areas. It is the MMO's view that more consideration needs to be given to above and below water noise.

Section 3: Conclusion
In line with MCCA 2009, it is the MMO's objective to make a contribution to the achievement of sustainable development within the UK Marine Area, which includes licensing of activities below MHWS. It is noted that the project involves a number of substantial elements within our regulatory remit and we welcome SZC Genco's ongoing pre-application engagement in this matter.

The MMO acknowledges that the project is still at an early stage within the DCO application process and works are ongoing to identify the relevant baselines, receptors and impacts. The information provided in this document is very high level in nature and therefore the MMO reserves the right to make further comments on this application throughout the process and to modify its present advice.

Whilst the Pre-Application Consultation documents primarily present information on the terrestrial aspects of the project, we note that some outline detail has been provided on the realistic worst case scenario for the marine infrastructure and we have provided comment accordingly. However, there is a need for more detailed information on construction and operation of marine elements of infrastructure such as BLF, coastal defences, cooling water system, combined drainage outfall and activities such as piling and dredging. In addition, the document, does not adequately capture all the infrastructure planned to be located below MHWS in many of the figures presented nor in a single prescriptive list and therefore should be updated prior to further consultation.

SZC Genco continue to liaise with the MMO and other members of the Defra group; we look forward to helping you resolve the issues above in the course of our ongoing engagement.

Yours sincerely,

Lauren

Lauren O'Connell
Marine Licensing Case Officer (Sizewell C)
Marine Management Organisation

Copies to:
Edward Walker (Marine Licensing Senior Case Manager – Coastal Energy)
Eva Szewczyk (Marine Licensing Case Manager – Coastal Energy)

References:
Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing Underwater Acoustic Thresholds for Onset of Permanent and Temporary Threshold Shifts, 2016, U.S. Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service, NOAA Technical Memorandum NMFS-OPR-55. Available online at https://www.sprep.org/attachments/VirLib/Global/technical-guidance-assessing-effects-anthropogenic-sound-marine-mammal-hearing-noaa.pdf

Maritime & Coastguard Agency

Navigation Safety Branch
Bay 2/20
Spring Place
105 Commercial Road
Southampton
SO15 1EG

Tel: **+44 (0)20 3817 2554**
E-mail: **nick.salter@mcga.gov.uk**

Gail Boyle
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your ref: **EN010012-000670**
Our ref:

13 June 2019

Dear Ms Boyle,

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

Thank you for recent letter inviting us to comment on the supporting documents for the proposed Sizewell C nuclear power station. The documents have been viewed by members of the Navigation Safety Branch and we have the following comments to make with regards to shipping and navigation.

Reference to the 2014 scoping document is confusing and contains errors e.g. paragraph 6.17.3 states: “The approach to the assessment of likely significant effects on marine navigation is set out in Section 7.15 of the 2014 EIA Scoping Report.”, however Section 7.15 addresses Marine Ecology.

The overall approach to the required and updated traffic study and Navigation Risk Assessment as described in Section 6.17 is accepted.

The proposed development includes a permanent Beach Landing Facility. At this stage we can only generalise and point the applicant in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. In consultation and liaison with a Harbour Master, they will need to develop a robust Safety Management System (SMS) for the project under this code.

The sections that we feel cover navigational safety under the PMSC and its Guide to Good Practice are as follows:

From the Guide to Good Practice, section 6 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for a vessel to use it. Section 6.7 Regulating harbour works covers this in more detail and have copied the extract below from the Guide to Good Practice.

INVESTORS IN PEOPLE | Silver

6.7 Regulating harbour works

6.7.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.

6.7.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation;
- high constructions, which potentially affect wind patterns; and
- lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.

There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.

The applicant should consult with Trinity House Lighthouse Service for the requirements for lighting and marking of the outfalls and jetty.

Following on from the scoping study an application for a Harbour Revision Order (HRO) may be required. If this is necessary, the MCA will need to be consulted again on any revisions we may require to enhance the initial conditions. Possible new conditions will be developed from the findings of a full Environmental Impact Assessment (EIS) report on the project.

Yours sincerely,

Nick Salter
Navigation Safety Branch
Maritime and Coastguard Agency

Response of Marlesford Parish Council

to

Planning Inspectorate

Regarding

EDF's Sizewell C Environmental Impact Assessment Scoping Report

Lord Marlesford
Chairman
Marlesford Parish Council

Melanie Thurston
Parish Clerk
marlesfordpc@gmail.com

19th June 2019

1. Introduction

Marlesford Parish Council gave its response to EDF's Stage 3 Consultation on 27th March 2019 and a copy has been attached with this submission to the Planning Inspectorate. That response set out in some detail the areas of EDF's proposals that this Council felt needed further work. Our main concern was the lack of detail from EDF in some critical areas which made it difficult, if not impossible to comment constructively on their plans, other than to request that more work should be done and greater clarity given to the proposals that this Council identifies as most heavily affecting this and surrounding communities.

We believe that it is premature for EDF to apply for a Scoping Opinion on their Environmental Impact Assessment (EIA) when, by their own admission they are still considering the responses to their Stage 3 Consultation. In EDF's Project Update (12th June 2019) they stated, "We are currently reviewing all the responses received and will be updating local residents and communities on our next steps for the project within a few weeks".

We welcome the fact that EDF are taking the time to properly consider comments made on the Stage 3 Consultation and we recognise the need for a Scoping Opinion, but we believe that the EIA Scoping Report cannot be comprehensive and accurate if, as EDF suggest they are still considering responses to their consultation which could result in changes to their proposals. Such changes could, in theory, require EDF to alter their EIA. Whilst we understand EDF's need to stick to their timetable, the approach that they are currently taking seems potentially inefficient and might give the impression that minds within EDF have already been made up. We believe that neither scenario is desirable.

We would point out that we do not have the technical resources to properly evaluate the approaches that EDF are proposing – we will have to rely on the skills available within PINS to make an assessment of whether EDF's proposals are logical, follow best practice, are pragmatic and conform to the relevant statutory requirements.

We have listed below our key areas of concern and would ask that PINS apply their usual tests to determine whether EDF proposals in each of these areas are adequate.

2. Southern Park and Ride

- We are opposed to the siting of the Southern Park and Ride (SPR) at the proposed site outside Wickham Market.

- In the Stage 3 Consultation documents, great weight was placed on the findings of the Gravity Model which purported to model centres of population and the traffic flows to and from the developments associated with Sizewell C (including SPR). We have seen no evidence of the assumptions behind the Gravity Model and would suggest that the Scoping Opinion challenges the robustness of the Gravity Model.

  We are particularly concerned that the traffic impact of a largely road led freight strategy on the operation of the SPR has not been fully evaluated.

- We believe that insufficient consideration has been given to the impacts of non- Sizewell related developments on the A12 to the south of Wickham Market, particularly the

emerging development of 2,000 residential units at Martlesham. This development and others to the south of Wickham market leads us to the conclusion that the better location for the SPR is to the south of Martlesham thus alleviating the congestion that would occur with traffic travelling on the A12 through Martlesham to get to EDF's proposed Wickham Market SPR site. The assumptions around traffic movements on the A12 north of the Seven Hills A14/A12 intersection need to be challenged.

- The capacity of the SPR at the Wickham Market site has been increased to 1,250 parking spaces (an expansion of 40% compared to the Stage 2 proposals). In our response to EDF we identified some confusion in the usage numbers being proposed and this will need clarification if the impacts of the SPR in its proposed location are to be properly mitigated. Whilst some additional bunding is now being proposed, it is not clear that this will adequately address the noise impact.

- The SPR will need to be lit at night. We would ask that PINS challenge the EDF proposals on lighting to ensure that light pollution in this "dark skies" area is kept to a minimum.

- We are very concerned about visual intrusion. The proposed SPR site is situated above the valley of the River Ore which has been designated as a Special Landscape Area. If the SPR were to go ahead at the Wickham Market site, EDF must be challenged on how they intend to lessen the impact of the development in this sensitive landscape.

- Whilst the general principle of aggregating site workers at park and ride facilities is supported, we believe the "green" strategy should go further and include electric charging points at the park and rides for users of electric cars and vans. It should also be a requirement that the shuttle buses to and from the main construction site should be electric.

3. Two Village Bypass

- Marlesford Parish Council strongly questions the logic for a Two Village Bypass (bypassing Stratford St Andrew and Farnham) as opposed to a Four Village Bypass (bypassing those two villages plus Marlesford and Little Glemham). Travelling north from the M25 on the A12, Marlesford (over 70 miles from the M25) is the first community <u>not</u> to have been bypassed. In view of the increase in traffic resulting from Sizewell C and the traffic associated with off-shore wind generated energy, the proposal not to bypass Marlesford and Little Glemham adds to the current environmental pressures on the two villages.

- The proposal for a Two Village Bypass is being promoted by EDF despite the apparent likelihood of a road led freight strategy. We argue that this is a wholly inadequate option and will have very significant adverse impacts on Marlesford and Little Glemham in terms of:
    - Air quality
    - Noise
    - Vibration
    - Community severance

- A proposal for a Four Village Bypass as part of Suffolk County Council's Suffolk Energy Gateway (SEGway) is already on the table and broadly follows the route approved by the Planning Inspector (Brown Route "B") at the Public Enquiry on "A12 (Wickham Market to Saxmundham) Improvement" in 1995. The route was carefully chosen as the one being the most environmentally sympathetic. It crosses the River Ore at its narrowest point and uses cuttings to reduce noise and visual intrusion. It is this Four Village Bypass that Marlesford Parish Council supports and which we believe delivers the most sustainable long-term solution and addresses the likely increase in traffic resulting not only from Sizewell C but other energy related developments along the East Anglian coast.

- We would urge PINS to robustly challenge the wisdom of a Two Village Bypass that would leave an unimproved non-dualled section of the A12 lying between the northern end of the Wickham Market bypass and whatever improvements are made at Stratford St Andrew and Farnham. This, in economic terms is a huge missed opportunity and will, without doubt, expose residents on this stretch of the A12 to unacceptable environmental impacts.

4. Freight Strategies

- Between Stage 2 and Stage 3 Consultation EDF dropped the marine led freight strategy, rail was given less weight and the road led strategy introduced. Whilst we cannot quantify our view, we would contend that the road led strategy is the worst option from a climate change perspective.

- As discussed above under Two Village Bypass, we are concerned that the additional impact of HGV traffic on the A12 under the road led freight strategy has been insufficiently analysed by EDF and we would ask that PINS closely examines the EDF assumptions in terms of noise, air quality and vibration.

- We believe that the traffic impacts resulting from a road led freight strategy will put increased pressure on minor road junctions with the A12. Of particular concern to Marlesford residents are the three junctions that join the A12 as it passes through the village. We believe that "platooning" (the aggregation of HGVs and buses into long continuous convoys) poses a real problem on the Marlesford stretch of the A12. In the absence of a Four Village Bypass, Marlesford Parish Council will want assurances that traffic flows have been properly modelled and that appropriate designs are applied to the junctions to mitigate the worst effects of increased traffic.

5. Conclusion

Marlesford Parish Council would urge PINS in their Scoping Opinion to ensure that EDF, through the planning process, properly considers the impacts that the Sizewell C development will have on East Suffolk and in particular Marlesford and the immediately surrounding area. EDF must be forced to properly consider the impacts of traffic and the potential development of the SPR in terms of noise, air quality, vibration, community severance and visual intrusion. The cumulative impacts of Sizewell C, other energy related developments along the coast and increasing residential development must be better addressed in EDF's planning application and this Council would urge PINS to give clear and firm guidance on these matters in the Scoping Opinion.

o0O0o

Response of Marlesford Parish Council
to
EDF Energy's Sizewell C
Stage 3 Public Consultation

Lord Marlesford
Chairman
Marlesford Parish Council

Melanie Thurston
Parish Clerk
marlesfordpc@gmail.com

27th March 2019

Table of Contents

1. Introduction 3
2. Summary 5
3. Southern Park and Ride 6
4. Two Village Bypass 10
5. Freight Strategies 13
6. Cumulative Impacts 16
7. General Areas of Comment (Including EDF Consultation Questionnaire) 17
8. Conclusions 20

Appendix 1 – Marlesford Parish Council Stage 2 Consultation Response

1) Introduction

This is the response of Marlesford Parish Council (MPC) to EDF Energy's (EDF) Sizewell C Stage 3 Consultation.

Marlesford is a small rural village of just over a hundred houses (many of them listed) and a total population of approximately 230 persons. The village sits within the Special Landscape Area of the River Ore valley and is approximately three miles north-east of Wickham Market. The village lies less than a mile to the north-east of the proposed Southern Park and Ride (SPR). Most of the village is within a designated Conservation Area. The A12 divides the village into two areas, one to the north-west of the A12 which forms the major part of the village and the other to the south-east of the road. On both sides of the A12 are bus-stops and the A12 has to be crossed by people using the bus service. On the south-east side of the A12 is the community's only shop.

The A12 is a source of noise and vibration (for those living close to the road), but in general the village is quiet and peaceful. There are no street lights in the village and residents in this intrinsically rural location value the dark skies.

Parish residents have attended the various consultation events organised by EDF and a parish representative attended the Sizewell C Community Forum meeting organised by EDF. On 9th March, MPC held an open meeting on the Stage 3 proposals which was attended by 40 residents. The village is broadly supportive of EDF's proposals for Sizewell C as a means of contributing to the UK's low carbon energy generation targets., but it has a number of serious and specific concerns.

Key resident concerns are:

- Objection to the SPR in its current site
- Proximity of SPR to the village and the impact of noise and light pollution from it
- Appropriate mitigation measures to control surface water run-off from the SPR
- The need for appropriate bunding and screening of the SPR to ameliorate visual impact and mitigate noise
- The need for a commitment to return the SPR site to agricultural use at the end of its life
- Increased traffic flows on local B roads particularly B1078 through Wickham Market and on Marlesford Road
- Increased traffic flows on the A12 adding to the problems of severance of the community and exacerbating the existing difficulties for traffic from the village crossing traffic flows when turning on to the A12 (particularly from Bell Lane and Marlesford Road)
- Noise and vibration impacts arising from the increased use of the A12 by HGVs serving the Sizewell C (SZC) development
- The urgent need for a Four Village Bypass (FVB) – Suffolk County Council's (SCC) SEGway option
- The general detrimental impact on the natural environment and the specific, potentially detrimental, effects on the RSPB nature reserve at Minsmere.
- Disappointment that the marine-led freight option has been abandoned and that the rail-led option is in question
- For EDF to appropriately recognise and compensate for the highly adverse impacts that residents in East Suffolk are going to suffer as a result of the SZC construction project.

The MPC response is primarily focused on these key local issues, but we recognise that there are many aspects of the proposed scheme that touch on other communities and we leave it to them to detail their own specific issues.

MPC would welcome further engagement with EDF on the village's particular concerns and it will participate in the Development Control Order process once the EDF application is lodged with the Planning Inspectorate.

MPC prepared a detailed response to EDF's Stage 2 SZC consultation. The response is attached at Appendix 1 as much of the comment in it is still relevant and it should be read in conjunction with this Stage 3 consultation response.

2) Summary

a) MPC broadly supports the principle of the provision of further nuclear generation capacity at the Sizewell site, but it has grave concerns about aspects of the proposals contained in EDF's Stage 3 consultation documents and is reluctant to endorse EDF's proposal at this stage.

b) In particular, there is a lack of detail in many areas. The Gravity Model assumptions are not transparent. SPR topics including lighting, bunding, air quality, noise and vibration are lacking in detail. The Stage 3 documents refer to 'ongoing assessment' and 'further planned work', which suggests that further detail will emerge in due course. We are concerned that the opportunity for further consultation on the conclusions emerging from this work will be limited given that this is the last proposed formal consultation opportunity before application submission.

c) As a principle, MPC believes that it is essential for off-site enabling infrastructure (particularly roads) to be provided in the most timely way possible in order to avoid adverse impacts on local communities in the early years of construction on the main site.

d) MPC is of the strong opinion that the SPR in its currently proposed location is inappropriate. It overlooks the two Special Landscape Areas of the Rivers Deben and Ore and will add a large and intrusive feature to the landscape at a prominent high point in the area. We challenge EDF to look for a park and ride site to the south of Woodbridge on the basis that this provides an opportunity to reduce the volumes of SZC traffic heading through the already congested Woodbridge and Martlesham area.

e) We are concerned about the EDF proposals for traffic using the B1078 in the Wickham Market area. Neither of the options in their current form is workable and we are asking EDF to reconsider. "White vans" travelling to and from the postal consolidation facility at the SPR must be properly controlled.

f) The A12 currently acts to sever the Marlesford community. The route is already heavily used, causing difficulties for Marlesford residents. MPC believes the potential addition of 878 HGV and bus movements per 10-hour working day with the associated issues of noise, air quality and vibration strongly justifies its long-held argument for a Four Village Bypass (FVB). This is in line with SCC's own plans for SEGway.

g) The guiding principle for EDF's freight strategies should be to minimise impacts on the quality of life of local communities (including the effects of pollution). To address this, MPC urges EDF to revisit its marine-led freight option, make more robust its efforts to deliver a rail-led option and to use road only as a last resort.

h) We are concerned that insufficient attention is paid to the cumulative effects of Scottish Power Renewable's plans for its off-shore wind farms, the Interconnector project and the Adastral Park housing development. We ask EDF to address the cumulative impacts of these projects.

i) The Suffolk Coast and Heaths AONB and the RSPB nature reserve at Minsmere make a nationally important contribution to landscape and conservation. EDF must do more to demonstrate that these assets are being properly protected.

j) We welcome the economic benefits that SZC will bring, but MPC asks EDF to recognise that there will also be economic disbenefits in terms of its tourism industry. The adverse impacts that East Suffolk will suffer will run over an extended period and requests that appropriate compensation is made to local communities.

3) Southern Park and Ride

a) We remain opposed to the SPR in the proposed location at Wickham Market (Hacheston):

i) It presents a very significant visual and environmental intrusion in an otherwise rural and agricultural landscape

ii) It fails to adequately address the elevation in traffic volume travelling to and from the SPR site on an already congested part of the A12 to the south of the proposed site and will do nothing to alleviate the existing congestion on the A12 around Woodbridge and Martlesham.

b) We note that SCC and Suffolk Coastal District Council (SCDC) in their Stage 2 response on the SPR state (Para 511), "Although the Park and Ride site at Wickham Market (Hacheston) is still considered the best of the three options originally presented, it has issues and challenges that will need addressing. It is suggested that further work is carried out on exploring an alternative Southern Park and Ride option along the A12 nearer to Ipswich – possibly by extending the existing Park and Ride site at Martlesham – it is acknowledged that further assessment on this would be required. This would take vehicles off the local highway network at a more appropriate stage of their journey and onto buses to the site."

There is no substantive evidence in EDF's Stage 3 Consultation to suggest that any attempt has been made between Stage 2 and Stage 3 to assess alternatives to the Wickham Market site. The Wickham Market site is referred to by EDF as its "preferred site", but in conversations with EDF staff we are told that it is actually their sole site. **We challenge that assumption and ask EDF to properly consider other park and ride sites to the south of Wickham Market, including the revisiting of the Martlesham option, looking at sites in the Foxhall area and considering a park and ride at Seven Hills.**

c) We note that the SPR capacity has increased by nearly 40% between Stage 2 and Stage 3 from the originally proposed 900 car spaces to 1,250. Whilst we accept that the SPR may not be fully utilised until the peak workforce is employed at the construction site, we are concerned that the usage numbers of 1,700 per day quoted by EDF (Vol 2, Para. 9.8.16) seem inconsistent with a three-shift working pattern. This suggests that either more capacity may be being allowed for than will actually be needed which could result in a bigger park and ride than is really required, or EDF's figure of 1,700 users is a significant understatement. We assume the apparent discrepancy may be down to assumptions on variations in daily usage and car sharing, but this is not made clear in the consultation document. **We would ask EDF to clarify the usage numbers and confirm that they are robust at the stress test level of 7,900 workers on the construction site at peak with 600 off-site workers.**

d) Vol 1, para 14.5.34 states "EDF Energy anticipates that the southern park and ride facility would be operational throughout the construction period. The peak use of the park and ride site will correlate with the peak of the project". From the timings given, it would appear that the SPR can only be available considerably later than the commencement of work on the main and other related sites. **MPC would want EDF to ensure that the SPR is operational from the start of work on the main construction site and other associated sites.**

e) The conclusions presented by EDF regarding where workers will travel from are derived from the Gravity Model. We see no indication in the consultation of the assumptions that lie behind the Gravity Model, it is therefore very difficult for MPC to draw any firm conclusions on whether the SPR usage numbers are justified, or even, whether the SPR is in the right location. **We would urge EDF to share the Gravity Model assumptions and output at an early stage post consultation.**

f) It is proposed that a Traffic Incident Management Area (TIMA) is created at the north-eastern side of the SPR. There is very limited detail on how this area will be used, managed and controlled and MPC request more detail on this aspect of the site. For example, under what circumstances will use of the facility be triggered and which body determines whether its use is appropriate and how many vehicles would be accommodated? **We request further detail from EDF on the use of the TIMA.**

g) We believe that it is inevitable that there will be a visual intrusion by the development on a sensitive landscape area. The proposed site sits above the valley of the River Ore which has been designated as a Special Landscape Area. At Stage 2 Consultation we raised serious concerns about the errors and omissions regarding the SPR (**see Appendix 1 Section 2. Visual Impact of SPR Proposals**). MPC notes that the Marlesford Conservation Area is not defined (Figure 9.5.1), whilst that of Wickham Market (arguably less affected) is. This was pointed out in the Marlesford submission at Stage 2 and we are disappointed that EDF's error has not been corrected. At the same time, we pointed out that the River Ore Special Landscape Area had not been referenced and we note that this omission has also not been corrected at Stage 3.

h) We welcome the apparent additional bunding to the eastern side of the site, however there is limited detail on the nature of the bunds and at Vol 1, Para 14.5.19 the following statement is made "Prior to any hardstanding being installed, topsoil (and potentially subsoil) would be removed and the site levelled. Any excess material would be stored on-site and used to create 2m and 3m high mounds/bunds at appropriate locations to provide visual screening". This is an insufficiently strong commitment. The use of the words "any excess" suggest that if there is no excess then bunds would either not be created or would be smaller than the 2-3 metres envisaged. **We believe that the bunding should be of a height appropriate to provide proper screening (particularly to views looking west from Marlesford village) and if bunds higher than 3m are required then they should be provided. Imported fill (if required) should be used for the creation of bunds rather than relying solely on native strip material.**

i) At Vol. 2B, Table 9.7.3, EDF claims that in the Operational Phase, the effect of noise and vibration will be "Not significant". We disagree and believe that careful attention will need to be paid to noise attenuation. Bunding and tree/shrub planting will be an essential part of any noise and visual impact mitigation. We would ask that bunds are not planted, but that planting is carried out on the "external side" of the bund in order to soften the outline of these unnatural features. This approach will also enable the bunds to be removed at decommissioning but the planting to be left in place as future landscape enhancement.

We note that a noise receptor within Marlesford village has been omitted from Figure 9.7.1.

j) Lighting is inadequately dealt with from a visual impact point of view. Marlesford is a "dark skies" area and proper attention needs to be given to mitigation of light pollution. We made reference to

this in our Stage 2 submission and we feel our comments have been ignored. We are particularly concerned about the effect of lighting on nocturnal fauna and would refer you to our Stage 2 Consultation response (**Appendix 1 Section 8a**).

k) Air quality is dealt with in a very cursory way and in the Operational Phase under Assessment of Effects, air quality issues are assessed as "Not likely to be significant". We contend that there is likely to be an air quality impact and with EDF's proposed 3,400 vehicle movements per day, we believe that this issue requires much greater analysis. In particular, Marlesford village is in the line of the prevailing winds which would carry polluted air to the east and north-east of the site and thence over the village. We are particularly concerned about the pollution effects of engine idling by users of the SPR (particularly buses, if they are not electric) and would ask that measures are put in place to prevent engine idling at the SPR.

l) Marlesford village sits in the valley of the River Ore. Parts of the village are low lying and meadows and roads within the village are subject to flooding from both the river and from surface water run-off. Marlesford Road which lies to the north east of the SPR site can be subject to flooding from run-off from the fields west of the road (and below the proposed site). We believe that SuDS are the appropriate way to mitigate surface water run-off from the SPR site and should be the primary method of attenuation. Special attention will need to be given to attenuating surface water run-off from the Traffic Incident Management Area. This area has the potential for polluting water courses from DERV and oil spills and adequate protection will need to be given in this area.

m) Ponds are identified on the SPR site. We would urge EDF to keep existing ponds wherever possible, but to adequately protect them so that they can be returned as high-quality landscape features when the SPR is decommissioned.

n) We approve of the concept of postal consolidation, but control of light goods vehicles (LGV) "white van" deliveries to the SPR Post Consolidation Centre needs to be controlled. Without the appropriate controls, white vans using local B roads will significantly contribute to severance, increased local journey times, road safety, capacity, noise and, potentially. air quality. MPC understands that vehicle management will rely on the mobile telephone network. In this area of Suffolk there are a significant number of "not spots" where no signal is available. **Therefore, to control LGV movements and provide a lasting infrastructure legacy, MPC would urge EDF to work with the mobile phone companies to ensure a wider, more comprehensive mobile signal coverage that eliminates existing "not spots".**

o) Vol. 1, para 14.5.28 states that consolidation will be from 88 LGV trips (176 movements) to two LGVs forwarded to Sizewell. Vol 1, para 5.4.39 refers to 700 LGV movements per day, we are unclear as to how these two numbers compare and why there is such a difference between them. We are concerned that no Delivery Management System (DMS) is to be used for LGVs. Without such a system it is likely that LGV's coming from the north and midlands will use the B1078 as their route of choice, putting additional pressure on this already heavily used road. **MPC needs clarification on how all LGV movements, whether using the Post Consolidation Centre or not, will be controlled.**

p) At Stage 2 Consultation, local communities (notably Wickham Market) pointed out that there is likely to be congestion in Wickham Market on the B1078 between Border Cot Lane and the River

Deben Bridge caused by traffic travelling to and from the SPR. EDF has proposed two options to overcome the problem:

Option 1: Removal of approximately 40 on-street car parking spaces on the B1078, with alternative provision of the parking spaces in close proximity to the lost parking (but a location is yet to be defined);
Option 2: Improvements to Valley Road and Easton Road.

We will leave our neighbours in Wickham Market to comment fully on the suitability of Option 1, but in our opinion, the solution would place an unfair burden on residents using the on-street parking and we believe that it will increase severance issues as a result of the increased volume of traffic using this stretch of the B1078.

We also believe that Option 2 as it stands is completely un-workable. Whilst we would support a route that diverts traffic to the north of Wickham Market, there are serious concerns about road widening issues and necessary junction improvements. The route relies on crossing the single carriageway Glevering Bridge which is a Grade II listed structure and there is apparently little information to support the practicality of using this bridge to accommodate the volume of traffic anticipated.

We are also concerned to note from our neighbours in Wickham market that there are apparent inconsistencies in the results from EDF's modelling of traffic coming through the village. We are aware that Wickham Market has made its own traffic measurements on the stretch of the B1078 between Border Cot Lane and the River Deben bridge. These measurements suggest that EDF's estimates of vehicle movements could underestimate the actual numbers by 1,000 movements per day. This implies that EDF's traffic measurements in this area may be wrong and therefore calls into question the wider traffic modelling assumption for the project.

The impact of traffic travelling through Wickham Market has to be mitigated, but neither of the proposed options would appear to be satisfactory**. We therefore request that EDF urgently revisit their proposals, reassess their traffic model and come up with alternative workable options.**

q) At various points in the consultation documents reference is made to returning the SPR site to agricultural use, however in relation to reinstatement the comment is made (Vol 2B, Para 9.1.5) that "Unless separate consent is obtained in the future to authorise any re-use, the area would be returned to agricultural use". This is an ambivalent statement and leaves open the possibility that an alternative use (other than a return to agricultural use) could be contemplated. **This is not acceptable to MPC and we will be seeking binding conditions that will require the return of the site to agricultural use.**

r) The inclusion of electric charging points in the design of the SPR is sought by MPC.

s) MPC requests that adequate provision is made (wherever possible) for designated cycleways from surrounding villages to allow safe access by bicycle to the SPR.

4) Two Village Bypass

a) MPC welcomes the commitment by EDF to fund and deliver a bypass to Stratford St Andrew and Farnham - the Two Village Bypass (TVB), however the Council has severe reservations as to its adequacy in dealing with the expected increases in traffic associated with the construction of Sizewell C and other large infrastructure projects such as the offshore wind projects and the National Grid interconnectors. For the reasons set out below, MPC remains of the opinion that the only long-term sustainable solution to the traffic issues faced by Marlesford and Little Glemham is the delivery of a dualled Four Village Bypass (FVB) as part of SCC's SEGway proposals. **MPC will be urging Central Government and SCC to provide funding to put alongside a proper and appropriate contribution to the cost of the SEGway provision by EDF.**

b) Provision of FVB

i) MPC are concerned by the length of time it will take to approve plans, construct and have the A12 ready for use to serve the SZC construction and it is stated (Vol 1, 12.5.17) that "EDF Energy proposes to construct the two village bypass in the early years of Sizewell C construction. Construction of the two village bypass is expected to take between 20 months and 2 years to complete". This is too vague and may fail to provide an early solution to an already pressing problem. **MPC will be lobbying SCC and central government to commit to an early start to a FVB ahead of a SZC construction start. Such an approach would ensure that appropriate infrastructure is in place at the earliest opportunity.**

ii) In the absence of an early delivery of a FVB (as indicated above), there must be a commitment on the part of EDF to deliver the TVB by a set date that is triggered by (and may still be in advance of) the start date of the main construction site. **MPC are concerned that any major infrastructure works will take time to consent in detail and MPC urge EDF to commit to such a trigger.**

iii) We would remind EDF that there is already an established route for a FVB (Brown Route "B") which was endorsed in the Planning Inspector's report of the Public Enquiry on "A12 (Wickham Market to Saxmundham) Improvement" produced in 1995. The proposals were subsequently approved by the Secretaries of State for Transport and the Environment and most recently, adopted in SCC's plans for SEGway (September 2017) broadly in the form approved by the Secretaries of State in 1996. **MPC requests that EDF properly engages with SCC over the design of the Stratford St Andrew/Farnham road mitigation measures in order that a quick and comprehensive solution is found to the potential provision of a FVB.**

c) We discuss the road-led freight option in more detail below, but of particular concern to MPC, in relation to the TVB, is the prospect of a road-led freight strategy rather than marine or rail. Under these circumstances we contend that the TVB is wholly inadequate to cope with the 13.5% increase in HGV movements under the road-led scheme compared to the rail-led. This will be particularly true under extended hours of operation within a road-led strategy.

SCC and SCDC in their own Stage 3 response at Para 805, referring to carriageway standards for traffic flow, conclude, "Based on EDF Energy's method of assessment the mitigation should be a Dual two-lane all-purpose road and we would request further justification from EDF Energy for the

proposed single carriageway bypass". **MPC support this view and urge EDF to adopt the dual-carriageway approach or justify (as requested by SCC/SCDC) how a single carriage option is appropriate.**

d) SCC and SCDC have aspirations for a dualled FVB which MPC support. In our view it is essential that the TVB is designed in such a way that it can form part of SEGway. As the EDF proposals currently stand we believe that this would not be possible. **We would urge EDF to work closely with SCC as the highways authority to develop a scheme for a FVB.**

e) We welcome the fact that the assessments of the AQMA situated at Stratford St Andrew mean that, as a result of the bypass, the AQMA could be lifted. We are, however, very concerned that air quality on the stretch of the A12 between the northern end of the Wickham Market bypass and the start of the proposed TVB will be significantly impaired by the estimated 1,850 – 2,100 additional daily vehicle movements. Residents in both Marlesford and Little Glemham live adjacent to the A12 and the risk from NOx and particulate pollution caused by the increased traffic is considered to be unacceptable. DEFRA guidelines state "Inhalation of particulate pollution can have adverse health impacts, and there is understood to be no safe threshold below which no adverse effects would be anticipated". **We would ask EDF to produce baseline data for PM2.5 and PM10 pollutants with realistic predictions for future emissions.**

f) We are concerned that inadequate data has been produced in relation to noise generated by the additional traffic and affecting the properties in close proximity to the A12 in Marlesford and Little Glemham. Approximately 15% of Marlesford residents live adjacent to the A12 and 85% live within ½ mile.

Whilst our strong preference is for the FVB, if the solution is a TVB then as part of noise mitigation measures for Marlesford and Little Glemham we would ask that EDF contribute to the provision of a "quiet surface" for the stretch of the A12 that passes through the two villages.
We urgently need to understand what the noise impacts will be (particularly under the extended working hours of a road-led strategy). We would ask EDF to make available what noise assessment data they already have.

g) We believe that the vibration effects resulting from increased numbers of HGVs and buses have not been fully assessed or quantified for the stretch of the A12 running through Little Glemham and Marlesford. A considerable number of properties in both villages are within feet of the road and in Marlesford some residents report adverse effects on their properties from the existing traffic flows. We fear that these problems will be exacerbated by the additional SZC traffic. **As in c) above, we will continue to press for a FVB.**

h) Of particular concern to MPC is the severance of Marlesford by the A12. The problem is considered to be severe with current traffic flows, but we consider that the situation will become intolerable with the additional SZC traffic, which is estimated to put an additional 10% traffic movements on the A12 compared to current flows. Pedestrians trying to cross from one side of the A12 to the other find it difficult and for older people, children and parents with pushchairs there is already a considerable risk. The video below was shot on 11th March 2019 and demonstrates the problem.

https://tinyurl.com/y238zcoe

We believe that platooning (convoys caused by the increase in HGVs, buses and other traffic), will pose a particular problem and it has been calculated from the EDF HGV movement numbers that on average a SZC-related HGV or bus will be passing through Marlesford and Little Glemham every 42 seconds.

In the event that a FVB is not provided, MPC ask that a safe crossing point is provided on the A12 in the vicinity of the Marlesford Farm Café on the south-eastern side of the A12 and the public footpath to the north-west of the road.

i) Marlesford has three junctions with the A12, Bell Lane to the north and Marlesford Road to the south, and on the eastern side of the A12, the Campsea Ashe junction. Both junctions on the western side of the A12 can be dangerous for vehicles crossing the north-bound traffic flow in order to turn south. The Bell Lane junction has a reduced line of sight to the north because of the rise in the road that obscures traffic travelling south. The Marlesford Road junction is affected by vehicles travelling north at speed (despite the 40mph restriction) and this limits the time available to turn south-bound onto the A12. There is good evidence to suggest that many drivers already turn north at this junction, travel as far as the Campsea Ashe turning, swing round and re-join the A12 to head south. At peak traffic times this can be the only way to join the south-bound carriageway, (further detail can be found in the MPC response to Stage 2 consultation at **Appendix 1 Section 4**). There is the additional concern that a closure or partial closure of the A12 because of an incident at either Marlesford or Little Glemham will cause major tailbacks affecting the B roads serving the A12 and add further to the problem of cars and LGVs accessing the SPR via B road "rat runs". **The increase in traffic referred to above will exacerbate the current problems and the FVB is seen as the only realistic solution.**

5) Freight Strategies

a) Marine Led

i) It is evident from EDF's assessment of responses to Stage 2 Consultation that a marine-led freight strategy was very well supported. MPC support this method of moving bulky construction materials to the SZC site. We are therefore very disappointed to see that the strategy is no longer being pursued. At Vol. 1 paragraph 5.4.4 EDF suggests that the construction of a jetty is likely 'to cause significant adverse effects on marine ecology, fisheries and marine mammals, including porpoise'. We cannot see any evidence within the consultation documents to support this view. MPC are concerned about the impacts of a jetty on the marine environment, but this important option should not be dismissed without compelling evidence that supports the strategy's rejection.

ii) There is a suggestion in the consultation documents that the costs of providing a jetty for the marine-led freight option is too great. For a project of this size and with such major social and environmental impacts we believe that EDF should re-examine the marine-led freight strategy and should be required to demonstrate in a set of balanced cost benefit analyses, the true position of the marine-led option versus the land-based alternatives. **MPC asks EDF to urgently re-visit the marine-led option and subject it to further, proper analysis.**

b) Rail Led

i) We support a rail-led freight strategy (if a marine-led strategy is not feasible) on the basis that it will reduce HGV deliveries to the construction site by 66% according to EDF's figures. We welcome the fact that EDF is maintaining a rail-led strategy as one of their options.

ii) We are, however, concerned at references in the consultation documents which raise questions about EDF's resolve to use this option. Of most concern is the reference (Vol 1, 5.1.4), where it is stated: "EDF Energy has not identified either the rail-led or road-led strategy as preferred at this stage and is seeking views on both options in this consultation. The work undertaken by Network Rail to date has focused on high level scheme feasibility, from which we anticipate that the rail-led strategy is likely to involve greater delivery risk than implementation of the road-led strategy. The rail-led strategy in particular involves significantly greater physical works to rail infrastructure and ongoing feasibility work requires additional physical surveys, site assessments and detailed design work to be undertaken. However, we do not yet know whether the necessary rail improvements required in the rail-led strategy are fully feasible or could be delivered on time. Therefore, in addition to considering the Stage 3 consultation responses, EDF Energy will need to further assess these risks and any potential implications on programme with Network Rail's assistance, as part of its decision on which strategy to pursue in the application for development consent".

This is a heavily qualified statement and suggests that EDF may already be contemplating a situation where rail plays little part in the overall freight strategy. If this is the case, it is an unacceptable position to be taking at this stage.

iii) The National Policy Statement for National Networks states that: 'Rail transport has a crucial role to play in delivering significant reductions in pollution and congestion. Tonne for tonne, rail freight produces 70% less CO2 than road freight, up to fifteen times lower NOx emissions and nearly 90% lower PM10 emissions. It also has de-congestion benefits – depending on its load, each freight train can remove between 43 and 77 HGVs from the road'. **For this reason, MPC asks that EDF uses its best endeavours to pursue a rail-led strategy and that through central government and the local authorities, pressure is brought to bear on Network Rail to plan for the delivery of a workable solution.**

iv) We understand that very substantial quantities of quarried material will be required for SZC construction. A rail-led (rather than road-led) strategy for transporting these materials is seen as being the most sustainable option.

v) We note that a freight management system would still be required under a rail-led option, but we cannot see that this need has been addressed by EDF in the consultation documents.

vi) We welcome EDF's proposals to upgrade parts of the local rail network. Any lasting increased passenger capacity resulting from EDF's upgrades would be seen as a positive legacy of the SZC project.

c) Road Led

i) At Stage 2, EDF was predominantly looking at a marine-led or rail-led freight strategy. At Stage 3 a road-led strategy has been introduced having dismissed the marine option and heavily caveated the rail option. This is viewed by MPC as a retrograde step and it does not properly take into account the adverse environmental, economic and social impacts which will ensue from an overall intensification (particularly when cumulative impacts are taken into account) of the already stretched road infrastructure of East Suffolk.

ii) We do not support a predominantly road-led strategy, but if this were the only freight solution, **MPC would want assurances that the necessary highways (including junction) improvements were carried out at the earliest possible date in order to avoid the anticipated pressures on the existing network.**

iii) As stated above, we welcome EDF's commitment to delivering a TVB for Stratford St Andrew and Farnham. W**e believe that there is currently a case for a FVB but that under the road-led strategy, this option becomes even more compelling. We ask EDF to make a realistic contribution (in conjunction with central government and SCC) towards the cost of a FVB.**

iv) We are pleased to see that EDF has taken the precaution of "stress testing" higher peak worker numbers at the main construction site and at associated off-site locations. The stress test envisages 7,900 workers at peak on the main construction site and 600 off-site workers compared to a base case of 5,600 main construction site workers and 500 off-site. We are gravely concerned that whilst a "worst case" scenario has been considered, the full impact of another 2,400 workers using the road network has been inadequately modelled and assessed for traffic impact, particularly its impact on the road network. **We would urge EDF to provide further explanation of the traffic impacts at the peak stress test workforce levels.**

v) Residents of Marlesford are regular users of the A12, both north and southbound. We are well aware of the congestion on the A12 in the Woodbridge and Martlesham areas and request that EDF works closely with SCC to provide improvements to the road network in this area.

vi) The impact of "platooning" (the aggregation of HGVs and buses into long continuous convoys) is a particular concern for residents in the villages along the A12. In Marlesford, without the FVB, it is anticipated that platooning will make the use of the Bell Lane and Marlesford Road junctions particularly difficult. It will add to issues of severance and make crossing of the A12 by pedestrians both dangerous and difficult. **In the event that a FVB is not delivered, MPC expects EDF to address junction improvements at both Bell Lane and Marlesford Road.**

vii) MPC is concerned that emissions from HGVs and buses will add measurable amounts of NOx and particulate pollutants and will affect air quality along the A12 corridor. We would expect EDF only to permit those HGVs that are specified as minimum Euro VI (or have equivalent emissions) thereby ensuring that only the cleanest vehicles are used. **Where buses serving the Northern Park and Ride and the SPR are concerned, we would urge EDF to adopt an "all-electric" bus policy.**

viii) The Orwell Bridge will be the major route into East Suffolk for HGVs. The bridge is routinely closed during periods of high winds. We are concerned that not only will the SZC traffic add to the congestion at times when the bridge is closed, but that HGV traffic will use alternative routes (including B roads) to join the A12 at points north of Woodbridge. Bridge closure is an entirely foreseeable risk and there is apparently no contingency for it. **MPC would ask that EDF formulates a proposal for coping with this eventuality in order to ensure that HGV traffic does not resort to using unsuitable minor roads. We would support a proposal that held vehicles to the west of the bridge in the Copdock interchange area.**

6) Cumulative Impacts

a) Whilst the potential for cumulative impacts from Scottish Power Renewables (SPR) and the National Grid Ventures (NGV) interconnector projects are referenced by EDF (Vol. 2B, Para 13.4.5), by their own admission there is more work to do in this area. MPC is particularly concerned that both projects (and, potentially, other developments serving offshore wind farms) are located in East Suffolk and we believe that it is inevitable that there will be cumulative impacts when these projects are under construction and SZC is being built.

b) There are a number of housing developments either under construction or planned for the Wickham Market/Framlingham/Saxmundham areas. There is no clear evidence that these developments have been taken into account in EDF's traffic modelling. MPC has a concern that the B roads serving these settlements and feeding onto the A12 are already congested and the additional development coupled with SZC traffic using the SPR will overload the local road network. In addition, as far as we can see, there is no mention of the 2,000-home Adastral Park at Martlesham. This will be a major housing development served by the A12 which is already congested in the Woodbridge/Martlesham area.

c) In July 2018 the Port of Felixstowe Growth and Development Needs Study - Final Report was prepared for SCDC. The "Central Case" scenario forecasts that the Port of Felixstowe will reach 5.1m container units by 2036, representing an increase of 1.4m units (38%) compared to its 2017 volumes. EDF refers (Vol 1, para 15.4.20) to the SCDC report in relation to the Local Plan but appears to have ignored the impact of the increase in container numbers on road and rail traffic.
MPC asks that EDF addresses all these cumulative effects and models the impact of all known housing developments, the windfarm and interconnector developments and the forecast expansion at Port of Felixstowe and properly specifies the cumulative traffic impacts on the A12/A14 and the rail network.

d) Of particular concern is the effect of cumulative impacts on air quality and MPC would ask that EDF produces a much more robust analysis of air quality issues than is presented in the Stage 3 consultation document.

7) General Areas of Comment (Including EDF Consultation Questionnaire)

a) Sizewell C Proposals: Overall Strategy

We accept that a project of the scale of SZC will inevitably bring with it very significant local impacts albeit on a "temporary" basis. However, this project is recognised as being of national importance and we feel that there is insufficient recognition of the social and environmental impacts on the wider area of East Suffolk, (containing as it does, a number of specially designated landscape areas including an AONB and Heritage Coast) when set against the benefits to the country as a whole.

For the benefit of the country as a whole, East Suffolk will bear the brunt of the disruption (social, environmental and economic) during the 10-12 year construction phase. **MPC want a better understanding from EDF of how appropriate compensation to local communities will be made via the Housing Fund, Community Fund, s106 commitments and other developer contributions.**

b) Main Development Site:

i) The redesign since Stage 2 of some of the main site buildings, (including the turbine hall) is welcomed, but we would ask that cladding, rendering and external painting are all carried out with sensitivity to the surrounding environment, recognising the special nature of the AONB.

ii) Since Stage 2, four tall pylons have been introduced to the main site. The height of these structures will have a very significant visual impact from both land and sea and will be a dramatic intrusion on the AONB. MPC urges EDF to reconsider the design of the infrastructure served by these pylons and thereby eliminate the requirement for these tall structures.

iii) A beach landing facility (BLF) will be constructed to take abnormal indivisible loads (AILs) by marine delivery. Whilst we regret the apparent abandonment of the marine-led strategy (which we have challenged above), we welcome this limited use of water borne transport as a means of reducing the transport by road of AILs. We have three issues:

- It is not clear what proportion of total AILs will be delivered by the BLF.
- We understand that the BLF will remain in place after the construction phase is completed. We need further detail on how this will affect public access to the beach.
- We note that despite the BLF being a permanent structure, it does not appear on any of the images of SZC which include the beach.

iv) It is recognised that the main site will have to be lit during both construction and operation. MPC is concerned that this presents the possibility for significant night-time light pollution and would ask that EDF takes all appropriate measures to mitigate light escape to this dark-skies area.

v) The SZC site is adjacent to the RSPB's internationally renowned Minsmere nature reserve and currently holds the European Diploma for Protected Areas. This award has been approved again in draft for renewal, but only on the condition that "the construction of the new reactor will not be at the detriment of the Minsmere Reserve." We believe that EDF should do nothing that will jeopardise the confirmation of this award and should do all within its power to ensure that the award is not rescinded as a result of its actions during the construction of SZC.

c) People and Economy

i) MPC welcomes the impact on the economy of East Suffolk of the construction and operation of SZC. It urges EDF to commit resources to:
- Training in schools
- Working with local FE colleges to "upskill" the local workforce
- Sourcing local labour (particularly from Lowestoft and the wider Waveney area)
- Sourcing local supplies wherever possible

ii) Concerns exist over the impact on the emergency services of a potential 7,900 site workers at peak and 600 off-site workers. We would ask that EDF engage in detail with the "blue light" services in order to ensure adequate provision to cover the incoming workforce, but also to ensure that SZC does not put additional stress on an already stretched emergency service.

iii) The accommodation campus would have 2,400 bed spaces. This makes it a very sizeable community with the potential for crime in the local area. EDF will be expected to adopt a "zero tolerance" approach to those working on the SZC site and who become involved in crime – of particular concern are drug use and prostitution.

iv) Community health services are already stretched in the Marlesford area and MPC needs EDF to work with community health providers to ensure that the local population are not disadvantaged by the influx of SZC workers who are likely to be competing for health services.

d) Accommodation: Overall Strategy

i) We are concerned that the influx of workers to East Suffolk will exert upward pressure on private rental values. In Somerset near Hinkley Point, the BBC reports that private rents have increased by 18% in 2018. We ask EDF to work with the local authorities and private landlords to ensure that affordable rented accommodation is not priced out of reach of local people.

e) Accommodation: Temporary Campus and Caravan Site

i) We will press SCC and SCDC to ensure that appropriate conditions are placed on the temporary campus and the Caravan site to ensure that these assets are not treated as "brownfield" at the end of the construction phase – this in order to prevent future residential development.

f) Transport: Movement of Materials

See comments under 6) Freight Strategies above.

g) Transport: Sizewell Halt or new rail siding

No comments.

h) Transport: Rail-led Strategy, Buckleswood Road

No comments.

i) Transport: Level Crossings

No comments.

j) Transport: Level Crossings (rail-led)

No comments.

k) Transport: Road-led Strategy, Freight Management Facility

See comments under Section 5 Freight Strategies above.

l) Transport: Park and Ride

See comments under Section 3 Southern Park and Ride above.

m) Transport: A12 Two Village Bypass

See comments under Section 4 Two Village Bypass above.

n) Transport: Road Improvements

See comments contained in other sections above.

o) Consultation Process

i) MPC are very concerned that a number of areas raised at its Stage 2 Consultation response have been overlooked or ignored by EDF at Stage 3. Some of these are simple corrections of errors in the Stage 2 Consultation documents and the fact that they have not been addressed undermines our confidence that our Stage 2 response was taken seriously.

ii) MPC are grateful for the fact that EDF provided consultation events and these were well attended by Marlesford residents. We would, however, make the observation that not all staff had a detailed understanding of the SZC proposals and some were unable to answer legitimate detailed questions and in some cases staff became defensive when being questioned. This was not helpful and added to the somewhat combative nature of the consultation process – something that MPC has tried hard to avoid engaging in.

iii) We are also grateful for EDF's contribution to the workshops run by Planning Aid England.

iv) Overall, MPC is concerned that at Stage 3, which is supposed to be the final consultation phase, much of the detail being presented is insufficient for us to be able to either comment, or take comfort that our Stage 2 concerns are being addressed. We believe that this is an unacceptable approach. We fully understand that more detail will emerge for the Development Control Order application, but by then the window of opportunity for under-resourced parish councils to review complex data will be narrowing and will put us and our neighbouring parishes at a grave disadvantage.

We therefore ask that EDF now considers a Stage 4 consultation as the final step for seeking local views before the DCO application is submitted to the Planning Inspectorate.

8) Conclusions

Marlesford, in common with much of this part of East Suffolk is a picturesque rural area. Our village, the surrounding countryside and the coast is highly valued by residents and visitors for its generally tranquil and beautiful heaths, rivers, farmland and shoreline.

We accept that Sizewell C is a project of national importance, but we would remind EDF and other decision makers that this part of East Suffolk will pay a heavy price in terms of social and environmental upheaval over at least a 10-12 year period.

Only one major artery, the A12, serves this part of Suffolk. It is currently considered inadequate to handle existing traffic flows and there are grave concerns about its ability to handle the cumulative effects of SZC and other on- and off-shore developments. Since the late '80s, it has been accepted that an upgrade is needed and a very positive legacy benefit of SZC (that would have real value for the residents of Marlesford, Little Glemham, Stratford St Andrew and Farnham) would be the delivery of a dualled FVB that links with the existing Wickham Market and Saxmundham bypasses and forms part of SCC's A12 SEGway proposals.

Whilst the park and ride concept is welcomed, we believe that the SPR is better relocated from its currently proposed, prominent position in a rural setting to a site further south on the A12 and in our comments above we have asked that EDF reconsider this option. We believe that there is logic in siting the SPR south of the Woodbridge and Martlesham areas which are already congested and which, with the development of Adastral Park, will become even more so.

The SZC construction in an Area of Outstanding Natural Beauty, the traffic associated with it and the manufacturing of components for the power station itself, will all have a huge environmental impact. A proportion of the current population of Marlesford may not see the completion of the SZC project and many others will be in their later years when the first electricity is generated by the new plant. We all have a responsibility to ensure that SZC is delivered in the most environmentally sensitive way, causing minimal disruption to local communities during the construction phase, leaving few reminders of whatever disruption there might have been and at the same time, wherever possible, leaving infrastructure and environmental benefits that provide a positive, lasting legacy for the generations that follow.

As we have said elsewhere in this response, we remain committed to working with EDF and others to achieve these aims and we would welcome further discussions.

Appendix 1 – Marlesford Parish Council Stage 2 Consultation Response

Marlesford Parish Council

response to:

Sizewell C: Stage 2 Consultation

29th January 2017

Contents

	Page
Introduction	3
Section 1 - Lack of Adequate Consultation	5
Section 2 - Visual Impact of Proposals	7
Section 3 – Major Incident HGV Park	10
Section 4 – Traffic and Road Access to A12	12
Section 5 - Lighting	15
Section 6 – Surface Water Run-off	17
Section 7 – Air Quality	19
Section 8a – Ecological Issues – Bats and Lighting	21
Section 8b – Ecological Issues Landscape and Wildlife	24
Section 9 -Return to Agricultural Land	27
Section 10 - Stage 2 EDF Consultation Questions – General Response	28
Conclusions	32

INTRODUCTION

Marlesford is a small rural village of just over a hundred houses (many of them listed) and a total population of approximately 250 persons. The village lies less than a mile to the north east of the proposed Southern Park and Ride (SPR). Most of the village is within a designated Conservation Area. The busy A12 runs through the village and during working hours, gaining access onto the main road from the parts of the village lying to the north west of the A12 is already very difficult. The constant stream of traffic presents a serious hazard for the less fleet of foot who need to cross the road to reach the shop or bus stop. Outside working hours, the road is quieter and in the evening, the whole village is peaceful (except Tuesday evening, which is bell ringing practice). There are no street lights in the village and residents in this intrinsically rural location value the dark skies and are concerned that these will be lost as a result of the lighting to the proposed SPR. The village nestles in the Special Landscape Area of the River Ore valley and is approximately three miles north-east of Wickham Market. It is the nearest village to the proposed park and ride site. Many of the houses in the village will have direct line-of-sight to it. This assumes that the site is where we think it will be. So far, EDF has not been able to provide the Parish Council with a detailed scaled map of the proposed development.

Whilst the Parish Council welcomes changes that have been made in the Stage 2 consultation document to the proposals for the SPR, such as the reduction in the number of park and ride spaces and the removal of the proposal for a lorry park (replaced by one for a "major incident" park), the Council still has grave concerns about the appropriateness of the siting of the proposed SPR. It wishes to seek assurances from EDF that, in the event of a "Four Village By-pass" (FVB) being approved by the Department of Transport and Suffolk County Council, the current Stage 2 proposals for the SPR will be revisited and new locations considered.

The Parish Council notes that under Section 12 of the Stage 2 consultation document, reference is made to further assessment work which is due to be carried out by EDF, namely:

- Environmental Impact Assessment (EIA)
- Habitat Regulations
- Flood Risk Assessment (FRA)
- Water Framework Directive (WFD)

Whilst it is recognised that this further work is required to meet EDF's statutory obligations it is hoped that in undertaking the additional assessments, the issues raised in this response to consultation will be considered and appropriately addressed.

The Parish Council invites EDF to work with it and the Marlesford residents to consider their concerns and the Council would welcome further discussions to seek ways of ameliorating the effects on the village of the SPR.

The Parish Council has itself consulted widely with residents, culminating in an Extraordinary Open Meeting of the Parish Council on 14th January 2017.The primary concerns of the village are:

1. Increased traffic on the A12 will result in more noise, litter, light pollution and air pollution. It will be more difficult for vehicle drivers from the village to gain access to the A12 and more difficult and dangerous for pedestrians to cross the road.
2. As a result of increased traffic on the A12, there will be a corresponding increase in the use of rat-runs. Marlesford Road and Ford Road are both narrow single track country lanes, without footpaths. Even a few extra vehicles on these roads will make life for local residents much more difficult when accessing their homes (and of course, worse for the pedestrians, cyclists and horse riders who use these lanes).
3. The village is surrounded by fields but we are concerned that, after a number of years as a park and ride (with associated facilities), without appropriate planning conditions, the site will not be returned to agricultural use.
4. The River Ore floods each winter but generally the village water meadows contain the flow. However, the section of Marlesford Road to the immediate NW of the A12 also tends to flood. This is between the park and ride location and the river. Any increased run-off from the site will exacerbate this problem.
5. Many houses in the village will have a direct view of the park and ride site, therefore any light leakage from the luminaires will be very visible and will change the night scene in the village. Similarly, noise from the site will impinge directly on the residents. There have been no details concerning noise abatement measures.
6. Over the last year or two, since the proposal to build Sizewell C was made, EDF have been very vague as to where the park and ride would be. For example, the name Marlesford does not appear in EDF documentation and the site has been moved nearer Marlesford since the Stage 1 consultation. In addition, the rules for using the lorry park do not appear clear and binding.
7. Unless some imaginative measures are taken, a hard surface park and ride will be an inferior wildlife habitat. The area is rich in wildlife, whose habitat will be degraded or destroyed under the current EDF scenario.

It is recognised that this response focuses mainly on the effects on Marlesford of the proposed SPR. The Parish Council does however accept that the proposals contained within the Stage 2 Consultation Document address issues relating to a nationally important, strategic project and on the basis of the need for long term, low carbon power generation. Marlesford Parish Council is broadly supportive of the plans for the development of Sizewell C.

Section 1 - Lack of Adequate Consultation

Description of Concern:	
Lack of proper consultation at Stage 1. Marlesford is the nearest village to the proposed P&R and yet were not properly consulted at Stage 1. The site of the proposed P&R as given in Stage 2 is not the same as that given in Stage 1. Therefore, the consultation at Stage 1, such as it was, was meaningless. EDF did not initially consult Marlesford villagers at all.	
Who or what is impacted and how? Initially, at Stage 1, none of the Marlesford villagers was given the chance to respond to the questionnaire sent round to other villages. It was only later after this had been drawn to Mr McGarry's attention at a meeting in Hacheston that a questionnaire was sent to Marlesford. Had no one mentioned this at the Hacheston meeting would Marlesford have been consulted at all? This casual attitude by EDF does not encourage confidence in their willingness to truly consult.	
The original site of the P&R as described in Stage 1 is no longer the site to be used. The current (new) site is mentioned for the first time in Stage 2. Therefore, there was no Stage 1 consultation on the P&R site. This failure to consult has affected everyone in Marlesford village.	
As evidenced by:	SZC-2 document p.72 6.3.10 states "widespread support" in response to Stage 1 consultation. This is highly misleading as it does not say who was consulted in this exercise. It was certainly not Marlesford, the village nearest to the proposed P&R. We understand that it was villagers in Wickham Market who were consulted and perhaps they are the ones who gave "widespread support" to the P&R.
How can the impact be avoided or mitigated? **What alternatives are there?**	There is nothing to be done about EDF's woeful failure to consult meaningfully in the past. However, much can be done for future meaningful consultation. We agree with EDF that they have held numerous consultations, meetings and exhibitions and spoken at length to various villages. Unfortunately, those attending these meetings are left with the feeling that they are an example of "going through the motions" (i.e. EDF are obliged to "consult" those affected). Those attending these meetings were left with the impression that EDF had no real interest in their opinions. Many answers to villagers' questions, such as concerns about the traffic generated at the shift change-over times that would cause traffic congestion in local roads and roundabouts, were brushed aside with such comments as EDF "would not make any provision for such short-term issues". Criticism of EDF in not providing proper maps of the P&R site was brushed aside as if unimportant. For example, see Stage 2 consultation leaflet Nov 2016, which was delivered to Marlesford houses. Inside the back cover of this leaflet a map is shown where the P&R site appears to cover the whole of Marlesford and is totally inadequate. Listening to villagers is not enough, there must be some evidence that EDF are heeding the opinions of those affected and altering some of their plans accordingly to mitigate some of the problems that they are causing.
Key details for the consultation response:	
If EDF wish to engage seriously with villagers in this consultation exercise, the first step must be to provide us with the information needed to make a reasoned response to the proposals. This must include a detailed large scale map of what is proposed at the P&R site. In addition, some accurate details of traffic flow at the	

roundabout at the junction of B1078/B1116 near the P&R is essential before villagers can make a meaningful response to the EDF proposals.
The failure of EDF to provide this simple information to date somewhat limits Marlesford's confidence in meaningful consultation in the future.

To mitigate EDF's failings to date we ask the following:

EDF immediately send us a proper A3 map of the proposed site with details and a meaningful scale.
EDF immediately send us such traffic data that they have obtained regarding the current traffic flows at various times of the day at the roundabout at the junction of B1078/B1116 and adjacent to the P&R site.
Projected hourly traffic flows to and from the P&R site when it is functioning should also be provided.
EDF should give a written assurance that any comments from the villagers at Stage 3 will not be dismissed as too late, but be taken into account and acted on by EDF.

Marlesford feels that lack of hard information from EDF hampers the ability of villagers to make meaningful decisions.

2. Visual Impact of SPR Proposals

Description of Concern:
Marlesford residents are concerned that the proposed development of the southern park & ride / lorry park will have a significant detrimental ***visual impact*** on the village.

Who or what is impacted and how?
Marlesford is a small village of just over 100 dwellings, nearly 25% of which are listed. Many of the dwellings, together with a number of the surrounding water meadows, are included in the Marlesford Conservation Area. Suffolk Coastal District Council's 'Marlesford Conservation Area Appraisal Supplementary Planning Document' (hereafter referred to as Marlesford CAA), published in December 2014, describes the village as being 'enhanced by its fine setting overlooking the water meadows of the River Ore flood plain'. The village and the river valley form part of the Ore Valley Special Landscape Area. The Marlesford CAA describes the village as having a 'dramatic edge-of-flood plain location' and its overall character as being 'one of an attractive, old, rural Suffolk village, which retains its traditional form and appearance. There has been little intrusive 20th century development ... The village, therefore, continues to retain the special characteristics, which strongly justify its Conservation Area designation.'

As evidenced by:
'When viewed from the surrounding area (especially from the A12), the form of [Marlesford]... appears as an attractive settlement in a rural landscape.' (Marlesford CAA). From the proposed park & ride site, the land drops away gently north-eastwards towards the main village which is contained in the valley of the River Ore below. Thus the proposed development would overlook the village and its setting of surrounding meadows, from a height. In view from the proposed site would be prominent listed buildings such as St Andrew's Church (Grade I) and Marlesford Hall (Grade II*) which occupies a site and has a view over the river valley which are generally regarded as of exceptional rural tranquility. 'Marlesford Hall Park is of significant value as an historic designed landscape... It is one of a small number of historic designed landscapes presently identified in Suffolk Coastal District Council's Supplementary Planning Guidance Document 6 (Historic Parks and Gardens) as being particularly worthy of preservation.' (Marlesford CAA)

Marlesford CAA identifies 'Important Views'. These include looking south and west from the public footpath through Marlesford Churchyard which has an outstanding position overlooking the water meadows of the River Ore; these views include the proposed lorry park site. Important views are indicated looking in all directions across the water meadows and in many of these the proposed park & ride site would be visible and would dominate the skyline.

From popular walks through and round the village the proposed development would be visible.

For those living in properties to the south and west of the village and along the A12 the visual impact would be particularly intrusive.

Key details for the consultation response:
The Consultation Document does not include a proper, scaled map from which to work. Figure 10.3 is inadequate and peters out entirely in the top right corner where part of Marlesford is located but not shown. Figure 10.4 has no scale and the vast majority of Marlesford village buildings, the water meadows and the Conservation Area are omitted. The lack of a scaled map showing the site in its setting with the surrounding villages (which has been requested but not yet received at date of writing), together with the lack of any substantial detail of what is proposed on site, makes it

impossible to accurately assess the development's visual impact. However, because part of the site boundary is within 100m of Marlesford parish boundary and the closest dwellings are only approx. 500m away, it is clear that the impact would be substantial and detrimental.

We find that there are significant omissions in the Consultation Document in terms of EDF's assessment of the proposal's impact on Marlesford:

1. paragraph 10.4.8 mentions the River Deben SLA but fails to note the River Ore SLA. The River Ore itself is closer to the site than the River Deben.
2. paragraph 10.4.8 also mentions listed buildings in Hacheston but there is no mention of the many listed buildings in Marlesford; for instance, Marlesford Church is only approx. 700m away from the proposed site.
3. paragraph 10.3.5 discusses environmental considerations and notes the landscape sensitivities of views from Wickham Market and the River Deben SLA but no mention is made of views from Marlesford or the River Ore SLA.
4. paragraph 10.4.3 discusses the closest residential properties to the site and mentions those in Hacheston but no mention at all is made of Marlesford properties, the closest of which are approx. 500m away.

This leads us to think that the revised site has not been properly considered as a new and separate entity but that the same assessment from the original site has been applied to the revised site. This is unacceptable. Neither has the site, therefore, been properly assessed and compared accurately in relation to the other proposed sites. We ask that EDF look again at their other site options.

Special Landscape Areas Policy AP13 states, 'The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality.'

Marlesford CAA states. 'Proper account should also always be taken of the impact that new development adjacent a conservation area can have on its setting. Although a conservation area boundary represents a demarcation enclosing a special area of historic interest, changes immediately outside of it can still have a significant impact on character and appearance. The setting of the conservation area, therefore, has an intrinsic value that must be acknowledged in any proposals for change to it.'

We therefore consider that the revised southern park and ride site now being proposed, which has been moved significantly nearer Marlesford than originally put forward in the Stage 1 consultation, is an entirely inappropriate location for such a development.

<u>How can the impact be avoided or mitigated</u>?
Whilst we recognise that Stage 2 proposals envisage a reduced number of park & ride spaces compared to those contained in Stage 1, and that the lorry park status has been changed to one of 'major incident' only, the scale of the development is wholly inappropriate for its setting in this sensitive rural landscape.

We thus consider that if it were to receive permission the level of mitigation should be commensurate with the enormity and inappropriateness of the project.

We consider that it is essential that the development is totally screened from Marlesford by adequately scaled grassed bunds. Planting is not acceptable as it would take too long to establish. Bunding would also help protect the village from noise, light pollution and motor fumes/pollution.

The installation of bunding is particularly important on:

5. the north-east boundary of the car park & ride; referring to figure 10.4 of the Consultation Document, screening here seems to rely on existing planting which consists of a thin deciduous hedgerow of 5-6 feet in height. This is totally inadequate to provide any mitigation for the development's visual intrusion.
6. On the north-east and south-east boundaries of the lorry park; figure 10.4 appears to suggest that the area will only be screened by planting. Again, this is inadequate as it would take far too long to establish; grassed bunding is essential here also.

Section 3 – Major Incident HGV Park

Description of Concern:	
Marlesford Parish council is concerned about the use of the proposed Southern Park & Ride facility as a ***holding area for HGV's*** in the event of a major incident/accident preventing normal timely access to the construction site. What are the criteria for such an incident? There is concern regarding 'mission creep'; that this 'stack area' might become a permanent site. How many HGV's can be accommodated? Will the parking area be expanded? If the 'stack area' is full, what will happen to the other HGV's Will the facilities be adequate? No consultation with relevant bodies has taken place up to this point	
Who or what is impacted and how?	
Marlesford village and surrounding area, Hacheston, Wickham Market & surrounding road network including A12	
As evidenced by:	Current traffic modelling already published by EDF for 'normal' traffic flow if disrupted would result in a huge build-up of traffic on the North-bound A12 & surrounding routes.
How can the impact be avoided or mitigated? **What alternatives are there**	Major incident & accidents cannot be foreseen or avoided. In the event of a 4-village bypass being built, the potential for the A12 being blocked would be greatly reduced. It is expected that the major incident lorry park would only be lit at times of use. There should be no reason for it to be security lit if not in use. Use of A14 stack area at Levington?
Key details for the consultation response:	
In the Stage 2 Consultation Document, EDF states: **6.4.59** In the event of an incident or accident preventing normal timely access to the construction site via the agreed HGV routes, EDF Energy anticipates putting in place a number of approaches to address these scenarios. This would include the development and implementation of communication procedures with the police, SCC and Highways England **t**o give early identification cation or warning of any incidents/accidents or events which could prevent normal smooth access to the site via the approved routes. Depending on the nature and location of the incident, a number of alternative approaches may be adopted, including: **-**The southern park and ride facility at Wickham Market includes an area for holding HGVs in the event of an incident on the local highway network or the main development site. I have contacted the relevant bodies mention above. Their responses are detailed below.	

Suffolk Police - Sgt Mark Beresford (Leiston Safer Neighbourhoods Team)20/1/17 by telephone
At this stage no consultation has occurred with Suffolk Police on strategies for dealing with major incidents on the A12 or the B1122 between Wickham Market & Sizewell. A road fatality would be an example of a major incident. Sgt Beresford said that the current procedure would be to find a suitable diversion (possibly via A140 & A1120). He was unable to comment further, regarding a stack area as no plans had yet been drawn up.

Highways England – (Zoe Lambert Asset Development administrator) 18/1/17 by email
"Stephen Greenhill who is the Asset Development Manager for Suffolk is attending a meeting on 24 January with senior members of the Sizewell C project team, which includes EDF, as part of the Stage 2 public consultation for the scheme"

No comment available until after this meeting

Suffolk County Council (Katherine Potts - Project Manager – Nationally Significant Infrastructure Projects) 20/1/17 by email

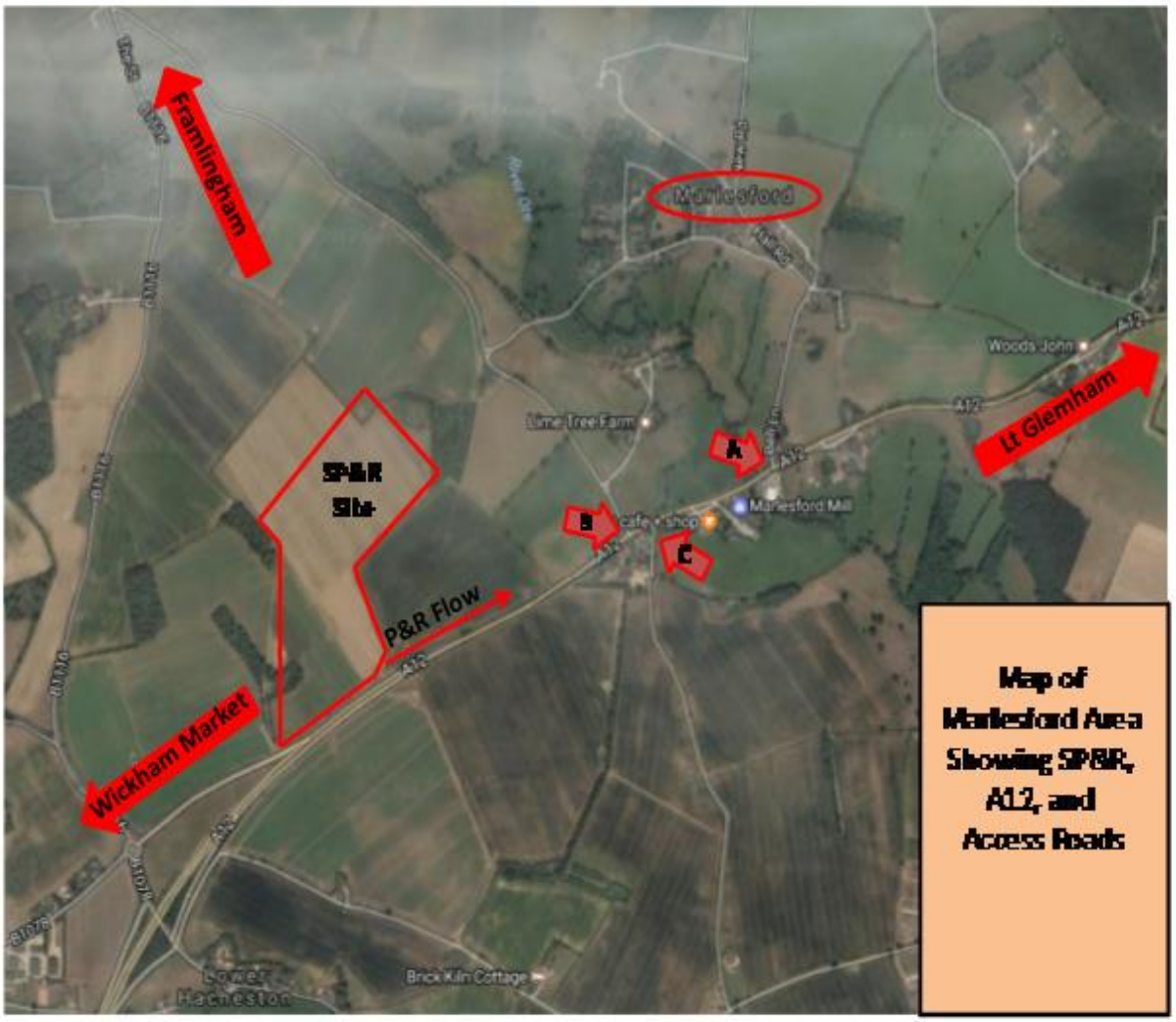
EDF Energy have yet to discuss any details about this with the Highway Authority (Suffolk County Council) or Suffolk Fire and Rescue service so I'm afraid we cannot give you information about how they plan to operate this or indeed what would be the trigger for using these. The Local Authorities are making a full response to EDF Energy about the Stage 2 consultation, which will be going to their Cabinet meetings on 31st January (papers available online from 5pm on Monday 23rd Jan) and this is one matter (amongst many) where we will be asking for additional information and evidence.

We were not aware of a meeting with Highways England. There is not sufficient detail available in the traffic modelling for the impact on the strategic road network to be known at present.

Section 4 - Traffic and Road Access to A12

Description of Concern:	
The Parish Council welcomes the apparent efforts being made by EDF to ensure that as much construction material traffic is taken off the road network and put onto rail or delivery by sea. Nonetheless, traffic arising from Sizewell C build will put a general strain on the East Suffolk road network and a particular strain on the A12 (to the north of Ipswich and the roads feeding it. The impact of the proposed Southern Park & Ride facility (SP&R) on local traffic will be considerable and, in particular, will make ***access onto the A12*** from the village of Marlesford so difficult as to be completely unacceptable to local residents. Additional concerns are the increased noise and air pollution that will be caused by this increased traffic through the village. About 15% of Marlesford residents live directly on the A12, with about 85% living within ½ mile north of the A12 (see attached map). The village has three local roads that intersect the A12, two from the north and one from the south (labelled A, B and C on the attached map). The southern road (C) connects only to surrounding countryside and is not a significant source of traffic onto the A12. The two northern roads (A and B) connect to other nearby villages and are local 'trunk' or 'feeder' roads, despite their modest size. The larger 'Bell Lane' (A) is a two-lane, single-carriage road that collects traffic from northern villages such as Parham and Framlingham. The smaller 'Marlesford Road' (B) connects only to Hacheston and is a single-track lane unsuitable for two-way traffic. Increase traffic flow on the major roads will inevitably give rise to more vehicles to find rat-runs on the minor lanes, producing a much higher incidence of clashes (requiring one of the parties to back up into a gateway or similar passing place).	
Who or what is impacted and how?	
Those most directly impacted will be residents of Marlesford, but, indirectly, all motorists trying to get onto the A12 through Marlesford will suffer. Once the SP&R is operating, traffic on all local roads, will increase significantly. This problem will continue until a permanent solution is found.	
As evidenced by:	At present it can be very difficult for motorists to enter the A12 from any road in Marlesford, because of heavy traffic on the A12; this is obviously worst at busy times. Turning right (south) from A or B (the most popular direction – to Wickham Market, Woodbridge and Ipswich) is doubly difficult because of the need for a simultaneous gap in traffic in both directions on the A12. The increase in A12 traffic projected for Sizewell-bound cars and HGVs will seriously worsen this existing problem. With the SP&R operating, Sizewell-bound vehicles entering from the P&R slip road will have 'first chance' to fill any gaps in the northbound traffic; this will very likely make access for motorists waiting at access roads in Marlesford so difficult as to be completely unacceptable. Additionally, common sense suggests that Sizewell workers living in the surrounding villages and using the SP&R will come from all directions to enter the SP&R. Heavier traffic on the main roads from Framlingham and northern villages will encourage these motorists to take short-cuts across country on lesser roads. Many of these will feed into Marlesford for access to the A12, and those motorists will need to turn south to reach the SP&R.
How can the impact be avoided or mitigated?	Sizewell-bound road traffic on the A12 could be reduced by increasing rail and sea transport alternatives. These are clearly preferable to road traffic. If buses ferrying workers to the construction site called in at Darsham station, employees could come from either North (Lowestoft) or South (Ipswich) by train rather than driving to either P&R. Both these towns suffer relatively high unemployment and so should be strong recruiting areas. See Appendix 1 for details of unemployment rates.

What alternatives are there?	The obvious solution to the traffic concerns mentioned here – A12 access, noise, air pollution – is the often-promised and long-awaited 'four-village bypass'. This would direct all Sizewell-bound traffic onto the bypass before reaching Marlesford and all the concerns expressed here would disappear. Even the present situation would be greatly improved. This is clearly our preferred option. To reduce the use of *rat-runs,* persuading SatNav providers to classify Marlesford Road and Ford Road as *access only* would reduce casual use of these single-track lanes by non-residents. If the bypass does not happen, and the SP&R does, then it may be necessary to install traffic lights in Marlesford, or at the exit of the SP&R. One set of lights, sensor-activated, at the intersection of Marlesford Road (B) and the A12 might suffice. Of course, while this would reduce the A12-access problem, it would have no effect on the noise and air pollution. A quieter road surfacing material would help with the noise, and this has been promised by SCC "next time the road is resurfaced". Only advancing technology seems likely to reduce the air pollution from the passing vehicles, especially the HGVs. Experience shows that, despite instructions to use the A14/A12 route to Marlesford, nearly all HGV's coming from the South and West cut across country, using B roads (e.g. B1116 and B1078). This is because the drivers are mainly subcontracted to deliver the goods and are often owner- drivers. When questioned why they did not follow instructions they deny that the instructions were passed to them and so just followed the shortest SatNav route. We need number-plate recognition equipment at the A14/A12 junction to check HGV's have come via that route.



Map of Marlesford Area Showing SP&R, A12, and Access Roads

Section 5 - Lighting

Description of Concern:
Adverse ***impact of artificial lighting*** on the area surrounding the site of the proposed southern park and ride facility, as defined in consultation document stage 2, with specific relevance to the village of Marlesford. It is proposed to run the P&R for 20 hours out of every 24, seven days a week, and to have full perimeter lighting as well as on site lighting**.**
Who or what is impacted and how?
Inhabitants of Marlesford, both within the Conservation Area and the wider community within the Ore river valley Special Landscape Area will be subject to light pollution from the southern park and ride site. Components include glare, light trespass, and brightening of the night sky. There will also be a detrimental impact on nocturnal wildlife (see separate associated comments [1] on lighting with respect to bats and also [2] on wildlife). The inappropriate or excessive use of artificial light can have serious environmental consequences for humans, for wildlife, and more broadly for the climate. The Campaign to Protect Rural England (CPRE) states "darkness at night is one of the key characteristics of rural areas. It represents a major difference between what is rural and what is urban. Light doesn't respect boundaries; it can spread for miles from the source and blurs the distinction between town and country. Light spilling up into the night sky is also a waste of energy and money.

As evidenced by:	Images available on http://www.blue-marble.de/nightlights reveal Marlesford and its immediate environs are currently dark at night. CPRE's Light Blight interactive maps showing the extent of England's light pollution record the area around the Ore river valley Special Landscape Area as having 0.25 – 0.5 Nano watts/Cm2/sr. This is the second lowest of nine divisions of measurement with the lowest at <0.25
How can the impact be avoided or mitigated? **What alternatives are there?**	The Institution of Lighting Engineers provides detailed guidance notes for the reduction of obtrusive lights. Any lighting of the site should: - be low level - be widely spaced - should be sensor based so that it operates for short periods rather than permanently - should not operate at all when the site is closed - bunding should be placed all along the perimeter of the site where it abuts the parish boundary

Key details for the consultation response:
10.5.5 states "Perimeter security fencing and lighting would also be provided." **10.5.13** states "Lighting would be provided at the perimeter of the facility and within the car parking areas for security and safety reasons. Regard will be given to minimising potential impact on ecological receptors, given that dark skies are a valued feature in the locality. Details of the lighting scheme would be provided at a subsequent stage of consultation, and features are likely to include the use of appropriate lux levels and directional lighting."

Table 10.2 states "Appropriate lux levels and directional lighting would be used during construction and operation to minimise the potential effects on neighbouring residential occupiers."

These statements do not provide adequate information, or, indeed, any information. However, examination of EDF's Flythrough visuals for Hinckley Point park and ride sites at Cannington, at the junction 23 of the M5 and at junction 24 of the M5 reveals a common standard. It is thus reasonable to assume that EDF plans the same concept for the Sizewell southern park and ride. There is nothing in those depictions to support EDF's assertions "… minimising potential impact... locality." and "Appropriate lux levels and directional lighting … minimise the potential effects…." . The lighting as depicted is of high density urban type.

EDF must apply rigorous tests to its lighting plans to ensure they comply with the latest developments in lighting design excellence and should not rely on the technology of the last century.

10.2.3 – Perimeter security fencing and lighting, details of proposed lighting schemes need to be made available in order to form a response.

10.2.4 – Justification as to the need to open for 20 out of 24 hours, as well as seven days a week. This means every single day for the next ten years this cannot be described as temporary, are EDF really requesting to operate these times.

Table 10.2 – A lighting scheme needs to be presented to demonstrate how it is proposed to "minimise the potential effects on neighbouring residential occupiers".

Section 6 - Surface Water Run-Off

Description of Concern:	
Impact of Southern Park and Ride (P&R) on ***surface water run-off***, particularly to the east of the proposed site. The concern is that, with large areas of hardstanding for cars and the provision of an area for major incident lorry parking, the potential for localised flooding in the area to the east of the proposed park and ride site from surface water run-off will increase. Without appropriate attenuation measures, there is the potential for pollution of water courses as a result of the run-off from areas used for vehicle parking.	
Who or what is impacted and how?	
Marlesford Road close to its junction with A12 and the unadopted track serving the Hedges, Lime Tree Farm, Lime Tree Barn, Lime Cottage. The River Ore is a likely receptor for surface water run-off.	
As evidenced by:	In times of heavy rain and when the surrounding agricultural land is close to full water holding capacity, on a regular basis, there is pooling of water close to the junction of Marlesford Road with the A12. It is believed that without appropriate mitigation measures that this problem will increase once the park and ride is completed and is being used.
How can the impact be avoided or mitigated? **What alternatives are there?**	Surface water run-off can be minimised by, wherever possible, using permeable or semi-permeable surfacing to the car park and the major incident lorry park. It is likely that a sustainable urban drainage system (SUDS) will be appropriate for this site, but it must be designed in such a way as to minimise direct run-off to the lower lying areas to the west and east of the proposed P&R site.
Key details for the consultation response:	
Point 10.5.16 in the Consultation Document states that SUDS will be required. The Masterplan showing swales is insufficiently detailed to determine whether such swales are likely to provide adequate protection. More detail is therefore required in order to satisfy Marlesford residents that the concern outlined above is going to be satisfactorily addressed. Table 10.2 (Preliminary Environmental Information) – Surface Water, refers to the River Deben and mitigation measures to protect that watercourse. There is no reference under Surface Water to the River Ore catchment. Further detailed proposals are therefore required to confirm that the River Ore catchment will be adequately protected. Table 10.2 (Preliminary Environmental Information) – Surface Water, refers to an attenuation pond to manage storm water flows on site. This provision is supported on the basis that it is constructed to a capacity that allows for maximum predicted flows.	

Flooding at Ford Road Marlesford.

Section 7 - Air Quality

Description of Concern:

The impact of a Southern Park and Ride facility situated at Marlesford/Hacheston on ***air quality*** in the immediate and surrounding area.

The concern is that by encouraging a massive increase in traffic and vehicle activity to the area, the air quality will drastically reduce in and around surrounding villages as well as along the A12.

With no specific details of monitoring undertaken, it is difficult to assess the impact.

Who or what is impacted and how?

A12

B1116

B1078 (slip road)

Hacheston, Wickham Market, Marlesford

As evidenced by:

Since June 2014, Stratford St Andrew has been an Air Quality Management Area as emissions of NO2 are consistently unacceptably high in this vicinity. In 2011 the council felt it necessary to monitor Farnham, Stratford St Andrew and Little Glemham as there were concerns over pollution levels in all these villages.

There is an additional AQMA in central Woodbridge, which could have an increased pollutant level due to traffic travelling to and from the Southern P&R.

As a result of the AQMA at Stratford St Andrew, SCC and SCDC are putting together an action plan to reduce emissions in this area. Their studies show that 53% of these emissions come from lorries and buses, which is disproportionate.

Without drastic mitigating measures, the emissions caused by Sizewell C traffic, both to the main site and into and out of the Park and Ride facilities, will push pollutant levels beyond those acceptable in the Air Quality Objectives.

There is currently little mention of PM2.5 or 10 levels in EDF (10.4.9) or the SCDC findings, but with the increase in car and HGV traffic through Marlesford and surrounding villages, these should be monitored and the estimated increase calculated. DEFRA guidelines state “Inhalation of particulate pollution can have adverse health impacts, and there is understood to be no safe threshold below which no adverse effects would be anticipated”. “Exposure to high concentrations can exacerbate lung and heart conditions, significantly affecting quality of life, and increase deaths hospital admissions. Children, the elderly and those with predisposed respiratory and cardiovascular disease, are known to be more susceptible to the health impacts from air pollution”.

How can the impact be avoided or mitigated?

The 4 village bypass which directs traffic away from the villages mentioned would reduce pollutants from emissions in areas at risk.

What alternatives are there?

The 4 village bypass.

Key details for the consultation response:

10.4.9 states that air quality monitoring has been undertaken by EDF Energy to establish baseline air quality using continuous monitors, but the document does not give enough detail as no mention of which areas were monitored or for how long.

Section 8a - Ecological Issues - Bats and Lighting

Description of Concern:

The potential impact of lighting associated with the Southern Park & Ride on ***bats*** that may use the area for roosting and foraging.

Who or what is impacted and how?

All British bats are protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation (Natural Habitats &c.) Regulations 1994 ('the Habitats Regulations') as amended 2010. Bats are nocturnal predators and their foraging behaviour can be impacted or altered by light pollution. Stone (2013) outlines issues relating to bats and lighting, the potential impacts on bat populations, how these impacts may be measured and the mitigation measures that can be considered.

Stone (2013) notes that Local Planning Authorities in Scotland, England and Wales have a duty to ensure that protected species issues are taken into account as a material consideration when determining planning applications. The National Planning Policy Framework (NPPF) (England), Technical Advice Note 5 (TAN5) (Wales) and Scottish Planning Policy provide guidance on protecting and enhancing biodiversity during the planning process. Paragraph 125 of the NPPF states:

By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Where European Protected Species are present and affected by development proposals, Local Planning Authorities must take into account the 'three tests' as set out in Article 16 of the Habitats Directive and outlined previously when determining planning applications.

Local Planning Authorities (LPAs) have a duty to ensure that protected species issues are taken into account in the preparation of strategic and local development plans as set out under Regulation 9 (5) of the Conservation of Habitats and Species Regulations (2010). Section 40 of the Natural Environment and Rural Communities Act (2006) also places an obligation on Public Bodies such as LPAs to have due regard to the purpose of conserving biodiversity.

As evidenced by:	Stone (2013) outlines in detail the potential impact of light on bats. She notes that: *Light pollution is a key biodiversity threat. It is listed within the top ten emerging issues in biodiversity conservation and has important implications for policy development and strategic planning (Hölker et al. 2010b). There has been increasing awareness of the ecological impacts of light pollution (Harder 2002; Longcore & Rich 2004; Smith 2009; Hölker et al. 2010a; Hölker et al. 2010b). Light pollution affects ecological interactions across a range of taxa and negatively affects critical animal behaviours including foraging, reproduction and communication (for reviews see Longcore & Rich 2004; Rich & Longcore 2006). Being nocturnal bats are among those species most likely to be impacted by lighting, although artificial light can impact all species and behaviours.*

Key details for the consultation response:

- We need to see full details of the scheme's proposed lighting plan.
- We need to see the results of the pre-development bat surveys to identify areas used by bats for commuting, foraging and roosting.
- We need to see a quantified pre-development bat habitat use map showing species presence and absence, key foraging, commuting and swarming sites, and an index of relative activity at each site (e.g. no. of bats/hour along each hedge/ at point counts in woodlands etc.).
- We need to see the pre-development light surveys to quantify existing light levels in areas used by bats.
- We need to see the predicted post-development light distribution maps and detailed descriptions of the lighting scheme.
- We need to see a predicted lighting impact map for bats combining the information obtained from the above survey.
- We need to know the time and height at which light measurements were recorded to enable comparisons before and after development.
- To mitigate the impact of lighting on bats we suggest the use of narrow spectrum lights with no UV content, low pressure sodium and warm white LED or directional downlights - illuminating below the horizontal plane which avoids light trespass into the environment.
- We also would want to see an overall mitigation plan for the whole development that considers using variable lighting regimes, habitat creation, spacing and height of units, reducing intensity, changing the light type and reducing spill to mitigate impacts on bats.

REFERENCES:

Harder, B. (2002) Deprived of Darkness. *Science News,* **161,** 248-249.

Hölker, F., Moss, T., Griefahn, B., Kloas, W., Voigt , C.C., Henckel, D., Hänel, A., Kappeler, P.M., Völker, S., Schwope, A., Franke, S., Uhrlandt, D., Fischer, J., Klenke, R., Wolter, C. & Tockner, K. (2010a) The dark side of light: a transdisciplinary research agenda for light pollution policy. *Ecology and Society,* **15**.

Hölker, F., Wolter, C., Perkin, E.K. & Tockner, K. (2010b) Light pollution as a biodiversity threat. *Trends in Ecology & Evolution*.

Longcore, T. & Rich, C. (2004) Ecological light pollution. *Frontiers in Ecology and the Environment,* **2,** 191-198.

Rich, C. & Longcore, T. (2006) *Ecological consequences of artificial night lighting*. Island Press, Washington, London.

Smith, M. (2009) Time to turn off the lights. *Nature,* **457,** 27.

Stone, E.L ed. (2013). *Bats and Lighting - Overview of current evidence and mitigation*. Bats and Lighting Research Project, University of Bristol. www.batsandlighting.co.uk

Section 8b - Ecological Issues – Landscape and Wildlife

<table>
<tr><td colspan="2">Description of Concern:</td></tr>
<tr><td colspan="2">The proposed southern park and ride site lies in close proximity to the Ore river valley Special Landscape Area and the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty and to the conservation area of Marlesford. The imposition of a major industrial development in such a sensitive area will degrade the landscape and reduce the viability of wildlife in and around the site.</td></tr>
<tr><td colspan="2">Who or what is impacted and how?</td></tr>
<tr><td colspan="2">Invertebrates, herpetofauna, birds, and mammals will be subject to complete or partial loss of available habitat, to reduced or removed foraging capacity, and to damage or destruction of breeding and or resting places. Plants and fungi will be destroyed during construction process.

The negative impact on wildlife will be long-term to permanent and includes, but not exclusively, the following causes:
- run-off from the hardstanding area for cars and lorries may contain polluting chemicals;
- pollution from increased traffic fumes;
- noise disturbance;
- light pollution affecting the behaviour of crepuscular and nocturnal animals.

There is a suggestion that ponds within the proposed area will be retained, but exactly how this will be achieved and what protection the ponds will have during the construction and life of the site is not specified.</td></tr>
<tr><td>As evidenced by:</td><td>Evidence on conflict between development and wildlife is too extensive to cite here but is widely available from environmental organisations, from scientific institutions and from university studies. As a short reference the World Wide Fund for Nature lists seven major threats to wildlife
http://wwf.panda.org/about_our_earth/species/problems/pollution/

Information on the impact of noise pollution on wildlife has been summarised by the Department of Transport in the USA
http://www.fhwa.dot.gov/environment/noise/noise_effect_on_wildlife/effects/effects.pdf

The Commission for Dark Skies talks in simple but concise terms about wildlife and light pollution
http://www.britastro.org/dark-skies/cfds_environment.php?topic=wildlife</td></tr>
<tr><td>How can the impact be avoided or mitigated?

What alternatives are there?</td><td>Impacts can only be avoided or mitigated against by undertaking detailed advance studies of the plant and animal life present at the proposed site and modelling the likely impact of light, noise and pollution. This does not appear to have been done. Nor or is it planned for the future according to the information presented in Tables 10.2 and 10.3.

Surface water run-off can be minimised by, wherever possible, using permeable or semi-permeable surfacing to the car park and the major incident lorry park.

It is likely that a sustainable urban drainage system (SUDS) will be appropriate for this site, but it must be designed in such a way as to minimise direct run-off to the lower lying areas to the west and east of the proposed P&R site.

If the ponds are to be retained then adequate surrounding habitat must also be retained to meet the ecological needs of species such as amphibians that may use the ponds as breeding sites. The ponds should not be considered as a potential overflow for water from</td></tr>
</table>

	the site that may contain pollutants that could adversely affect these and other species that use these ponds. Surveys should be conducted to ascertain the presence or otherwise of protected amphibians or reptiles and contingency plans set in place for translocation if necessary. Consideration should be given to installing lighting schemes that minimise potential pollution. These might include switching lights off when areas are not in use or having systems that only illuminate an area when a trigger is made. Consideration should be given to instigating management schemes that limit the emission of potential air pollutants such as severe restrictions on the amount of time that vehicles are allowed to run their engines. Planting of shelter belts must be put around the site and should begin at the earliest possible stage of the construction, not left till the end of the process. Planting should comprise native species. This is in addition to bunding, which is required to mitigate noise and light pollution and visual impact. The grassed areas shown in Figure 10.4 should be planned on the "wildflower meadow" model. This can be a far more cost effective option than large areas of barren grass as it requires little the way of management rather than barren mown. Use of the "wildflower meadow" option and of native species in perimeter planting will provide a degree of compensation for habitat loss. Consideration should be given to using ecological concepts for buildings, particularly green roofs.
Key details for the consultation response:	
Section 10.1.1 Indicates that EDF's overall objective is that Sizewell C would be designed and implemented to "high environmental standards, taking full account of the sensitivity of its location." We believe that the consultation does not demonstrate that they are following this plan. Section 10.5.17 indicates that the ponds on the site would be retained and would help attenuate storm water as well as maintaining their habitat value. It is not clear what this will mean in practice and how habitat value will be maintained. Table 10.2 outlines preliminary environmental information about terrestrial ecology and ornithology. This is a very small section in a large table. It is not clear what this covers. What plant and animal surveys have been done? What kind of habitat assessment has been done? It is essential that surveys and assessments be carried out in advance of construction and made available to the planning authorities and the public. The mitigation measures mentioned refer to the Whin Belt and other woodland being retained outside the development area but there is nothing about mitigating against light and noise pollution or pollution from possible chemical run-off from the site.	

Section 9 - Return to Agricultural Land

Description of Concern:	
Return to agricultural use of the Southern Park and Ride (SP&R) site, following completion of the Sizewell C build.	
Who or what is impacted and how? The Marlesford residents will be impacted for a long period of time (many years) both visually, environmentally and with pollution, not currently affecting those residents.	
• Soils and agricultural use of the land proposed to be occupied by the SP&R. • Visual impact from the A12 and surrounding villages.	
As evidenced by:	While we welcome the comments made in table 10.2, under *Soils and agriculture*, we note that there is no firm commitment to return **the entire** proposed SP&R site to agricultural use at the end of the Sizewell construction period.
How can the impact be avoided or mitigated? **What alternatives are there?**	We would expect, under the orders granting consent for the SP&R that conditions would be applied requiring the whole site to be returned to agricultural use.
Key details for the consultation response:	
Point 10.2.3 bullet point 10 states the top soil for the park and ride will be set aside for site restoration: • Please confirm where the soil will be set aside on site if not used for mounds/bunds? • How EDF plan to remove the tarmac and replace the top soil after years of use of the park and ride, when the soil will significantly deteriorate over that period. Point 10.3.6 bullet point states that the Wickham Market Park and ride has Agricultural Land Classification of Grade 3: 1. Will EDF confirm in writing the Park and Ride will be restored to the same ALC Grade 3 following “take down” of the Park and Ride. Recommend the EDF planning consent documentation must confirm the site is returned to agricultural use with a recommended timeline. The planning document must be seen by the Marlesford residents prior to “breaking ground” on site. Point 10.5.15 states that the top soil excavated to build the park and ride will be used for Mounds and Bunds – this contradicts what the residents of Marlesford have verbally been informed by EDF in various consultation meetings. Clarification is required.	

Section 10 - Stage 2 EDF Consultation Questions – General Response

10.1. Overall Proposals

Marlesford Parish Council does accept that the proposals contained within the Stage 2 Consultation Document address issues relating to a nationally important, strategic project and on the basis of the need for long term, low carbon power generation, Marlesford Parish Council is broadly supportive of the plans for the development of Sizewell C.

The Parish Council takes issue however with the level of detail contained in the consultation document which has made it difficult to comment constructively on matters directly affecting the parish.

10.2 Main Development Site: Environment

The extent of the main development site means that it intrudes heavily on both the Suffolk Coasts and Heath Area of Outstanding Natural Beauty and the Suffolk Heritage Coast.

The Suffolk coast economy relies heavily on tourism and this sector is likely to suffer significantly for the duration of the Sizewell C development. It is therefore essential that EDF do all they can to mitigate the impact of their construction presence during the development.

Whilst, given the nature of the development, the impacts are understood, it is expected that on completion of the construction phase of Sizewell C, the area will be returned to as near its current state as it is possible to get.

10.3 New Access Road

No comment on this consultation question

10.4. Managing construction materials

See comments under 8 & 9 below.

10.5. Accommodation: Overall Strategy

Marlesford Parish Council welcomes the principle of the provision of accommodation at the construction site as a means of reducing vehicle movements to and from the site, however, it recognises that the Eastbridge area is a highly sensitive landscape and the nature of the development will greatly intrude on the amenity of the area, particularly for its local residents, but also for visitors to the Suffolk coast. The Parish Council would question whether EDF has fully and exhaustively explored the possibility for off–shore accommodation. It believes that more work should be done in this area.

If land-based accommodation is the final decision, the Parish Council expects that EDF will, as far as is possible, mitigate its impacts for the duration of the construction phase.

The Parish Council in general, welcomes the proposals for enhancement and restoration of the site once the construction phase is complete, but it will need to see further detailed proposals to satisfy itself that such

enhancement and restoration works will be acceptable.

10.6. Accommodation: Campus Layout

No further comments on this consultation question.

10.7. Transport: Overall Strategy

Refer to Sections 1 - 9 for concerns regarding Marlesford parish

10.8. Transport: Rail

A single freight train has the potential to remove 50 HGV deliveries to the construction site (100 vehicle movements). EDF are urged to maximise their use of rail as a means of reducing traffic using the A12 and the approach roads to the construction site.

Infrastructure improvements would be required to achieve five freight train deliveries to site per day, but the benefit would be a reduction in total vehicle movements of 500 HGVs per day. To achieve this, there is a requirement for:

- A passing loop at Wickham Market station (Campsea Ashe)
- Alternatively, double tracking the stretch of line between Woodbridge and Saxmundham.
- Use of the "green rail route" into the construction site which would avoid the necessity to "double handle" freight from rail to road in order to get it into the site.

EDF is urged to ensure that its plans for rail maximise the legacy benefit to East Suffolk following the completion of the construction phase. An improved East Suffolk Line is seen as a significant driver for economic growth generally and a means of better accessing the relatively under-resourced north-eastern part of the County.

10.9. Transport: Sea

Marlesford Parish Council's major concerns centre around the increased traffic using the A12 which runs through the village, and the attendant impact on the surrounding landscape, of the SPR. Imaginative use of transport by sea would play a key part in reducing the Council's concerns and it would urge EDF to be more bold in its adoption of transport by sea as a means of reducing road congestion, pollution and noise.

10.10. Transport: Park and Ride

Refer to sections 1 - 9 for concerns regarding Marlesford parish

Northern Park and Ride

Marlesford Parish Council believes that an as yet unexplored opportunity exists for the improved use of the Northern Park and Ride (NPR). Unemployment figures published in a briefing paper available through the House of Commons Library indicates that the highest levels of unemployment are in Waveney, in the north of the County (see table below). Lowest levels of unemployment are in Suffolk Coastal and South Suffolk constituencies.

Unemployment by Claimant Count for December 2016, by Suffolk Parliamentary Constituency.

	% of Population

UK	2.4
Waveney	4.1
Ipswich	2.5
Central Suffolk and N. Ipswich	1.1
Bury St Edmunds	1.0
South Suffolk	1.0
West Suffolk	1.0
Suffolk Coastal	0.9

Source: Briefing Paper Number 7835, 18 January 2017: House of Commons Library

This implies that proportionally more workers from the north of the County may be available for employment at the Sizewell C site. This would suggest a greater emphasis be placed on the development of the NPR with a strong linkage to the Darsham railway station.

Those workers travelling from the south of the County should be able to make use of an enhanced passenger train service to enable them to reach the NPR.

Marlesford Parish Council would urge EDF to review their position on how the NPR could be better integrated into the transport proposals with a view to eliminating the need for the SPR completely.

10.11. Transport: Road Improvements A12

Marlesford Parish Council would support Option 4 – the Two Village Bypass. None of the other options presented by EDF would be acceptable given the predicted volumes of traffic using the A12.

That said, the overall objective of the Parish Council is to strive for a Four Village Bypass (Suffolk Energy Gateway) as this is seen as providing the best long term solution to an inevitable long term growth in traffic using the A12. It would deliver a quick boost for the East Suffolk economy which would help to counterbalance the negative impacts that the Sizewell C project is likely to have in the short-run.

It would provide a significant legacy benefit to this part of Suffolk, post-construction phase and whilst it is recognised that the Four Village Bypass is not part of EDF's consultation, Marlesford Parish Council would urge them to support it during its discussions with Department for Transport, Suffolk County Council and Suffolk Coastal District Council.

If a Four Village Bypass was to be approved in advance of a consent being granted on the SPR site, Marlesford Parish Council would insist on EDF reconsidering the appropriateness of the currently proposed SPR site, which it believes, in that event, would become redundant.

10.12. Transport: Yoxford/B1122

No further comments on this consultation question.

10.13. People and Economy

Marlesford Parish Council welcomes the opportunity for the creation of high skilled jobs, both in the construction phase and when Sizewell C is operational. As is evidenced in the table above, there is an unequal distribution of employment in the County and the Council would urge EDF to use its best efforts to engage young people from the current pockets of deprivation (of which Leiston would be one) on meaningful training programmes that will equip them to contribute during the construction phase, have the best opportunities to find work in other industries post

construction and to find opportunities for employment once Sizewell C is operational.

10.14. Consultation Process

The period of time from the launch of consultation on 23rd November 2016 to a response submission deadline of 3rd February 2017 is considered to be too short, particularly in view of the Christmas and New Year holidays. EDF have presented the community with a complex document covering a wide range of impacts on the area and there is an inevitable imbalance of resource between EDF and the consultees. This imbalance could have been partially offset (and communities' responses better considered) had more time been available.

As a general comment, the lack of specific detail in key areas of the consultation has made objective and constructive comment difficult.

The indication from EDF is that by the time the Stage 3 consultation is reached, the proposals will be in near final form and there will be limited opportunity for communities to further influence EDF's final plans. This is an unacceptable position and Marlesford Parish Council strongly requests that EDF engages with local communities in such a way that they can influence EDF's plans before Stage 3 is reached.

CONCLUSIONS

Marlesford Parish Council remains opposed to the siting of the SPR on the edge of the village and would urge EDF to continue to seek more appropriate locations. In particular, and in the event that a Four Village Bypass is approved, the Parish Council would expect EDF to reconsider the appropriateness of the proposed siting of the SPR, given that the route of the A12 would be changing.

As referred to in 10.10 above, the Council would expect EDF to consider its proposal for the enhancement of the NPR and the elimination of the requirement for the SPR.

As recent evidence suggests, the highest rates of unemployment in East Suffolk are in Waveney, which suggests that the park and ride at Darsham, if appropriately linked to the railway station, would provide a more logical centre for park and ride activity and might remove the necessity for the SPR at Marlesford.

The Parish Council accepts however that it is required to respond to the substantive issues contained in the EDF Stage 2 Consultation Document and on that basis we summarise the actions which we believe will be required to address the concerns detailed in Sections 1 – 9 above.

1. A properly scaled and appropriately detailed map of the "red lined" area of the SPR is required as a matter of urgency. The location of the SPR has changed between Stage 1 and Stage 2 consultations and the Parish Council believes that the process of consultation around that decision is flawed and without the detailed information it is very difficult to make sound judgements on the proposals.
2. Marlesford is barely mentioned in the Stage 2 Consultation Document and whilst references are made to the River Deben, nothing is said about the River Ore. All this suggests that following the "eastwards shift" of the SPR, no attempt has been made to put the new site in the context of the surrounding landscape, particularly in relation to Marlesford Village and the valley of the River Ore. This significant omission needs to be corrected prior to Stage 3.
3. And related to point 2 above, we believe that the visual impact of the SPR on Marlesford village will be substantial and intrusive. Throughout this submission, mitigation measures are referred to, but only appropriately scaled bunding is likely to lessen the impact of the SPR on the village – in terms of visual impact, noise, lighting and air pollution. At various points in Section 10 of the Stage 2 Consultation Document planting is referred to – this in itself is not going to help and whilst it might form part of an overall landscaping scheme, the length of time taken for planting to develop will mean that it is unlikely to provide appropriate mitigation at least in the early life of the SPR.
4. Road congestion on the A12 and feeder roads is an inevitable consequence of the proposals for the SPR and the wider development of Sizewell C. There appear to be substantive gaps in the information available, for example on private vehicle movements to and from the SPR and the traffic impact in the area of the roundabout at the junction of the B1078 and B1116. An understanding of the traffic flows at this critical junction is essential. The Parish Council expects EDF to produce meaningful proposals for mitigating the difficulties for Marlesford traffic getting onto the A12 from the village.
5. The lorry park has now been designated for use, only in the event of a major incident. Marlesford Parish Council will be seeking a planning condition to ensure that this in fact happens and that there is no scope for the lorry park to be used at other times. We expect EDF to adhere to the police definition of a major incident and only open up the lorry park when such an incident is declared by the police.
6. Serious concerns remain regarding the proposed siting of the SPR on noise, air pollution and lighting. Whilst it is accepted that these issues should be addressed in the EIA, the Parish Council expects that the reasonable mitigation measures proposed should be fully and properly incorporated into the Stage 3 Consultation Document. Many of the concerns could be addressed by good use of appropriately scaled bunding and low light pollution lighting, in particular, we would not want to see lighting of the lorry park other than at times of use.

7. Further concerns exist regarding the degrading of habitats and the lack of mitigation proposals and compensatory habitat creation. Again we recognise that these issues should be addressed through the EIA and Habitats Assessment, but far more detail will be required if we are to support proposals at Stage 3.
8. Marlesford Parish Council will seek a planning condition to ensure that the site of the SPR is returned to agricultural use and we expect to see a detailed commitment at Stage 3 from EDF to undertake the necessary remediation works.

Marlesford Parish Council seeks to secure the following benefits which it believes can be justified as a result of the impact of the EDF proposals on Marlesford and the surrounding area.

i. The A12 at Marlesford to be surfaced with a wearing course of "low noise" material to lessen the noise impact on sensitive receptors in the village and immediately surrounding area.
ii. EDF to ensure that companies providing Satnav devices clearly show Ford Road and Marlesford Road as "access only" routes.
iii. The "loop" being provided at Wickham Market station to be left in place as a legacy benefit once construction of Sizewell C has been completed.

There is a feeling that EDF are "going through the motions" of consultation and Marlesford residents have no sense that EDF are willing to engage in a proper, genuine and meaningful way. If this impression is to be dispelled, it will require EDF to take the lead in recognising the residents' concerns, meeting with them if further understanding is required and ensuring that before the Stage 3 consultation is published, sufficient additional, detailed information is made available which will allow residents to either accept that their concerns have been allayed, or provide them with the information required to make better informed representations.

As previously stated, Marlesford Parish Council will welcome any opportunity to work with EDF to address the concerns of residents.

oOOo

From:	[redacted]
To:	SizewellC
Subject:	Request for comments on the information to be provided in the Environmental Statement relating to Sizewell C development
Date:	20 June 2019 13:31:16

Dear Planning Inspectorate,
Melton Parish Council has considered the above request and wishes to make the following observations:

1. EDF's seeking a Scoping Opinion very soon after the close of Stage 3 consultations, and its proposals to conduct Environmental Impact Assessments are entirely based on the plans presented during those consultations.
2. Given that EDF has not had time to consider the substantive responses to Stage 3 proposals made by statutory consultees and others, we consider that – by seeking a Scoping Opinion at this time – EDF is totally undermining the consultation process.
3. If, as a result of the Stage 3 consultations, EDF amends its plans in the coming months, the Scoping would not stand, as EDF would need to assess the Environmental Impact on any new or revised plans.
4. Parish Councils have been given very little time – less than a month – to respond to this lengthy document.

Yours sincerely

William Grosvenor
Clerk to Melton Parish Council
17 Riduna Park, Station Road, Melton, Woodbridge IP12 1QT

Tel: 01394 382224
Email: [redacted]
Web: www.melton-suffolk-pc.gov.uk
Melton Parish Council Office Opening Hours: Tuesday, Wednesday and Thursday 10.00 a.m. to 12 noon and 2.00 p.m. to 4.00 p.m. by appointment only.

You have received this email from Melton Parish Council. The information contained within it or any attachment may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorized use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Melton Parish Council will be the Data Controller of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safely and securely, processed and used or shared only for the purpose for which it has been provided or where allowed by law. By contacting Melton Parish Council you agree that your contact details may be held and processed for the purpose of corresponding. You may request access to the information we hold on you or to be removed as a contact at any time by contacting clerk@melton-suffolk-pc.gov.uk. Melton Parish Council's Privacy Notice can be viewed at www.melton-suffolk-pc.gov.uk/PrivacyNotice.html.

MIDDLETON-CUM-FORDLEY PARISH COUNCIL

Mrs Sharon Smith
Arbour House
Rectory Road
Middleton
Saxmundham
IP17 3NP

01728 648576
parishclerkmiddletoncumfordley@gmail.com

Ms Gail Boyle
Case Leader
The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Response to Sizewell C EIA Scoping Report: EN010012

Dear Ms Boyle

Middleton-cum-Fordley Parish Council has considerable concern regarding both the timing and contents of the Sizewell C EIA Scoping Report EN010012:

- EDF is proffering a Scoping Report almost immediately after the close of the Stage 3 Consultation, with unsubstantiated Environmental Impact Assessments entirely based on those presented during that consultation.
- EDF will not have had time to consider the substantive responses to Stage 3 proposals, and by seeking a Scoping Opinion at this time, EDF is totally undermining the consultation process.
- If, as a result of the Stage 3 consultations, EDF amends its plans in the coming months, this Scoping Opinion would not stand, as EDF would need to assess the Environmental Impact on any new or revised plans.
- Consultees have been given very little time - less than a month - to respond to this lengthy document.

It would seem this Scoping Report was written concurrently with the drafting of the Stage 3 Consultation, as no account has been taken of the responses, questioning certain choices, by statutory authorities and others, such as:

- The proposed Sizewell Link Road and Theberton Bypass;
- Dropping the marine-led strategy;
- The introduction of tall pylons;
- Additional development within the AONB;
- Inappropriate mitigation to reduce delays in surrounding areas;
- Concerns about the impact on coastal processes;
- No evidence on steps to limit the impact of borrow pits and stock piles;
- No evidence to support location of the accommodation campus.

EDF has continuously stated its intention to be a good neighbour, but there is little or no evidence of the final stage of public consultation having been used to understand statutory consultees' and neighbours' concerns or to modify their plans. It appears that only expediency and efficiency as perceived by EDF are of importance.

The result of this is that, if amendments are subsequently found to be needed in the proposals, another stage of consultation and a further Scoping Report could and should be required.

There were significant changes in the Stage 3 Consultation:

- Removal of the jetty, thus abandoning seaborne delivery of bulk materials;
- The addition of road-led and rail-led transport alternative strategies;
- The Theberton Bypass and Sizewell Link Road.

EDF have dismissed the alternative Sizewell Relief Road routes, one of which was originally proposed during the Sizewell B construction proposal (then known as D2 , approximating to route W in Stage 3 consultation), citing engineering difficulties, which are not accepted by Suffolk County Council (SCC). The more southerly route of D2/W presents less difficulty and is far less invasive to properties than the EDF proposed route.
Indeed, SCC have concerns as to whether they would adopt the Sizewell Link Road as it would run parallel to the existing B1122. It thus offers little if any additional commercial capacity, and would represent a mindless and needless destruction of large swathes of the area. A relief road such as D2/W from South of Saxmundham to Leiston would be of significant future value, reducing use on the B1122 to the advantage of communities along that road, offering a shorter route from the South to Sizewell and Leiston Industrial areas and providing better access for the traffic to and from the various proposed wind-farm and continental interconnector substation sites in this area.
EDF expressed uncertainty in the Stage 3 Consultation that Network Rail will be able to deliver the required changes to the rail infrastructure for either "option" within the timescale. These doubts must be resolved and presented to the public for consultation prior to any DCO Application.

We believe that these major changes should be further discussed with the statutory consultees and submitted to a fourth round of public consultation, after proposals acceptable to all the consultees are found. The responses to Stage 3 from local authorities and other statutory consultees do not support the proposals as currently presented.

This is especially so in the case of the joint SCC/SCDC submission, where they perceive the disadvantages of constructing SZC outweigh any future advantages. The responses from RSPB and the Environment Agency are both highly critical of the lack of specific solutions to the many important environmental and ecological issues raised, the EA going further in demanding that they be provided with EDF's solutions, when drafted, before the DCO Application.

EN-6 and the new NPS also state that new single nuclear power station sites are expected to be in the region of 30 hectares, although it was cognisant that the exact size would depend on the specific design and configuration of the site. Currently the platform size for the proposed dual reactor development on the SZC site is only 32 hectares. Examination of the Stage 3 Consultation documents it has shown there are several issues with attempting to fit two reactors onto the envisaged platform:

- In earlier consultations, it was intended to connect the generating turbines to the National Grid substation via underground galleries. However, there is insufficient space to construct these galleries within the footprint of the site, resulting in four tall pylons being needed. These pylons are not in keeping with the Sizewell site being totally within the Suffolk Coast and Heaths AONB and on the foreshore of the Suffolk Heritage Coast
- The hard-coastal defence (HCD) currently proposed by EDF terminates just west of the existing sacrificial dune and 1metre above the Ordnance Datum (OD). As currently designed, the HCD is inadequate as its termination point leaves the defence liable to immediate erosion once exposed by low Spring tides.

It has been suggested that the whole platform should be moved back and increased in size to resolve these issues, but EDF have said in public on several occasions that they do not think this is possible. The land to the West of the proposed platform is all low -lying and within the Sizewell Marshes Site of Special Scientific Interest (SSSI). It consists of 10metre-deep peat deposits, so would have a very significant ecological and hydrological impact and a significant environmental challenge to the SSSI. In addition, it would require a significant increase in volumes of wet peat needing to be neutralised by burial in the borrow pits, causing long-term watercourse pollution and an additional engineering challenge to providing a stable platform.

Given all the above aspects, it is perhaps inappropriate to attempt to fit two reactors onto this very constrained site, and that if the development is to proceed, it should be limited to a single reactor. If such a conclusion is reached during any DCO application review, the need for the SZB facilities relocation, subject of a current inappropriate planning application, which could see the destruction of Coronation Wood and use of Pillbox Field, would be entirely unnecessary, as the existing SZB and proposed SZC site have enough space to accommodate a single reactor within the overall footprint.

In summary we feel this Scoping Report is premature. It should be postponed until all the Stage 3 consultation responses have been properly considered and discussed with statutory consultees, and suitable changes made. Time should be given for a final public consultation on a proposal that can be supported by the statutory consultees. Only then can a Scoping Report be drawn up and properly submitted to the Planning Inspectorate for an opinion to be returned.

Yours sincerely

Sharon Smith
Clerk to Middleton cum Fordley Parish Council

MINISTRY OF DEFENCE

Defence Infrastructure Organisation

Safeguarding
Estates
Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel:
E-mail: [redacted]

www.mod.uk/DIO

Ms Gail Boyle
Major Casework
Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

20 June 2019

Your ref. EN010012 - 000670

DIO ref. 10045853

Dear Ms Boyle

Sizewell C Nuclear Power Station

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Thank you for consulting the Ministry of Defence (MOD) on the request made by EDF Energy (the applicant) for a scoping consultation to support their preparation of an Environmental Statement for their application to obtain a development consent order for the Sizewell C nuclear power station.

Having reviewed the scoping report prepared by the applicant, in May 2019, I can advise that the site identified for the proposed development does not occupy any MOD statutory safeguarding zones relating to military explosives storage sites, aerodromes, air weapon ranges or technical sites. The site does not occupy a Military Air Traffic Zone or an Air Traffic Zone surrounding a military aerodrome or areas of airspace used for operational low flying training. The development will not be in proximity to areas used for military activities (including firing).

It should be noted that the development site does occupy an area that is used for generic military low flying training activities. Subject to verifying the precise location and height of structures that will be featured in the development scheme, the MOD may request that certain tall and narrow profile structures (temporary and permanent) are fitted with aviation warning lighting. It may be appropriate for the applicant to consider the potential implications of this upon visual amenity as part of their impact assessment.

The submission indicates that the new power station will now be connected to the National Grid via new overhead powerline infrastructure. The MOD would wish to review the plans for any such installation(s) in relation to military low flying activities that may be conducted in the area and ensure that new overhead powerlines are accurately marked on aviation charts.

With respect to the offshore element of the proposed development, it is noted that the scheme will feature the installation of subsea coolant intake and discharge infrastructure. The MOD would wish to review the plans for any such installations and associated marine works to ensure they will not impact on generic maritime defence interests.

I trust this clarifies our position on this consultation. Please do not hesitate to contact me should you require further information.

Yours sincerely

Jon Wilson

Senior Safeguarding Manager

From: [redacted]
[redacted]
Cc: SizewellC
Subject: NATS Safeguarding
Date: RE: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation [SG27404]
Attachments: 18 June 2019 09:49:46
[redacted]

Dear Sirs,

NATS operates no infrastructure within 40km of the application's location. Accordingly it anticipates no impact and has no comments to make on the application.

Regards
S. Rossi
NATS Safeguarding Office

Sacha Rossi
ATC Systems Safeguarding Engineer

D: 01489 444205

E: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

From: SizewellC <sizewellc@planninginspectorate.gov.uk>
Sent: 23 May 2019 11:03
Subject: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Sizewell C Nuclear Power Station. Please note the deadline for consultation responses is 20 June 2019 and is a statutory requirement that cannot be extended.

Kind regards,
Gail Boyle
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: SizewellC@planninginspectorate.gov.uk
Web: http://infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning website)
This communication does not constitute legal advice.
Please view our Privacy Notice before sending information to the Planning Inspectorate.

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Sent electronically to:

SizewellC@planninginspectorate.gov.uk

Anne Holdsworth
DCO Liaison Officer
Land & Business Support

[redacted]
Tel: +44 (0)7960 175682

www.nationalgrid.com

10th June 2019

Dear Sir/Madam

Ref: Application by EDF Energy (the Applicant) for an Order Granting Development Consent for the Sizewell C Nuclear Power Station (the Proposed Development) Scoping Consultation

This is a joint response on behalf of National Grid Electricity Transmission Plc (NGET) and National Grid Gas Plc (NGG). I refer to your letter dated 23rd May 2019 in relation to the Scoping Opinion for the above Proposed Development.

Our comments are as follows:

National Grid infrastructure within / in close proximity to the order boundary:

Gas Transmission

National Grid has no gas transmission assets located within or in close proximity to the proposed order limits.

Electricity Transmission

National Grid Electricity Transmission has a high voltage electricity overhead transmission lines, underground cables and high voltage substations within or in close proximity to the consultation area. The overhead lines, underground cables and substations form an essential part of the electricity transmission network in England and Wales.

Overhead Lines

- 4ZW 400kV Overhead Line Route Bramford to Sizewell
- 4ZX 400kV Overhead Line Route Bramford to Sizewell

Underground Cables

- 132kV Underground Cable Sizewell A to Leiston SGT1
- 132kV Underground Cable Sizewell A to Leiston SGT2
- 132kV Underground Cable Sizewell A to Leiston SGT3

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

- 132kV Underground Cable Sizewell A to Leiston SGT4

Substations

- Sizewell A 132kV Substation
- Sizewell B 400kV Substation
- Leiston 132kV Substation
- Leiston 400kV Substation

The following points should be taken into consideration.

Electricity Infrastructure:

- National Grid's Overhead Line is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004) available at: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/appendixIII/appIII-part2

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- Further guidance on development near electricity transmission overhead lines is available here: http://www.nationalgrid.com/NR/rdonlyres/1E990EE5-D068-4DD6-8C9A-4D0B06A1BA79/31436/Developmentnearoverheadlines1.pdf

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (http://www.hse.gov.uk/) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above

- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To view the National Grid Policy's for our Sense of Place Document. Please use the link below:
http://www2.nationalgrid.com/uk/services/land-and-development/publications/

To download a copy of the HSE Guidance HS(G)47, please use the following link:
http://www.hse.gov.uk/pubns/books/hsg47.htm

We would request that the potential impact of the proposed scheme on National Grid’s existing assets as set out above is considered in the Environmental Statement.

Yours faithfully

[redacted]

Anne Holdsworth

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

Date: 20 June 2019
Our ref: 283783
Your ref: EN010012-000670

FAO Gail Boyle
EIA and Land Rights Advisor on behalf of the Secretary of State
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

SizewellC@planninginspectorate.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Boyle

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

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

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 23 May 2019 which we received the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. **Annex A** to this letter provides Natural England's advice on the general scope of the Environmental Impact Assessment (EIA) for this development. More detailed comment on the content of the report entitled *Sizewell C EIA Scoping Report* (EDF Energy, dated May 2019) is given in **Annex B** to this letter. **Annex C** includes Natural England's advice to EDF Energy on the Sizewell C – Stage 3 Consultation: 4th January 2019 to 29th March 2019 under Section 42 of the Planning Act 2008 which is referenced throughout Annex B.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Jack Haynes using the contact details given below. For any new

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Jack Haynes
Lead Adviser
Norfolk & Suffolk Area Team

Andy Millar
Senior Adviser
Norfolk & Suffolk Area Team

Email: [redacted]

Tel: 0208 02 64857

Annex A – Natural England's general advice relating to the EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework (NPPF) sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European/ International sites (e.g. designated Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the NPPF requires that potential SPAs, possible SACs, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment (AA) needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect (LSE) on a European/Internationally designated site be identified or be uncertain, the competent authority may need to prepare an AA, in addition to consideration of impacts through the EIA process.

2.2.1 Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (i.e. SACs, SPAs and Ramsar sites etc.)

The development site is within the following designated nature conservation sites:

- Outer Thames Estuary SPA
- Sizewell Marshes SSSI

It is also directly adjacent to:

- Minsmere to Walberswick Heaths & Marshes SAC
- Minsmere-Walberswick SPA and Ramsar site
- Minsmere-Walberswick Heaths and Marshes SSSI

Furthermore, the various project elements (main development site and associated development) are identified as presenting potential impact pathways to:

- Sandlings SPA
- Leiston-Aldeburgh SSSI
- Southern North Sea SAC
- Alde-Ore & Butley Estuaries SAC
- Alde-Ore Estuary SPA, Ramsar site and SSSI
- Orfordness-Shingle Street SAC
- Orford Inshore Marine Conservation Zone (MCZ)
- Benacre to Easton Bavents Lagoons SAC
- Benacre to Easton Bavents SPA
- Pakefield to Easton Bavents SSSI
- Dew's Ponds SAC
- The Humber Estuary SAC
- Staverton Park and the Thicks, Wantisden SAC
- Stour and Orwell Estuaries SPA and Ramsar site
- Orwell Estuary SSSI
- The Wash and North Norfolk Coast SAC
- Westleton Heath National Nature Reserve (NNR)
- Suffolk Coast NNR
- Orfordness-Havergate NNR

The Natura 2000 network site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216 and further information on the SSSIs and their special interest features can be found at www.magic.gov . The ES should include a full assessment of the direct and indirect effects of the development, as outlined above, on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

In this case the proposal is not directly connected with, or necessary to, the management of a European site. In our view it is likely that it will have a significant effect on internationally designated sites and therefore will require assessment under the Habitats Regulations. We recommend that there should be a separate section of the ES to address impacts upon European and Ramsar sites entitled 'Information to inform the Habitats Regulations Assessment' and/or 'Report to inform the Appropriate Assessment' (RIAA) .

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites, such as Suffolk Shingle Beaches County Wildlife Site (CWS). Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The ES should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact Suffolk Wildlife Trust, GeoSuffolk or Suffolk Biological Records Centre for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is

available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site and also provide opportunities for overall biodiversity (or wildlife) net gain. The developer may find the relevant National Character Area (NCA) Profile: 82 Suffolk Coast and Heaths (NE491) document helpful in formulating ideas here. With regards to S41 priority habitats and species, Natural England would be keen to discuss with EDF Energy the possibility of creating and enhancing habitat for Suffolk coast priorities and ecologically linking these to existing semi-natural areas. The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (para. 175) which states that:

> *When determining planning applications, local planning authorities should apply the following principles:*
>
> > *a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts);*
> > *c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the Suffolk Biological Records Centre, Suffolk Wildlife Trust, GeoSuffolk or other recording society and a local landscape characterisation document).

- Local Record Centre (LRC) in Suffolk please contact: http://www.suffolkbrc.org.uk/
- County Wildlife Sites in Suffolk please contact: http://www.suffolkbrc.org.uk/ or http://www.suffolkwildlifetrust.org/
- Geological sites in Suffolk please contact: http://www.geosuffolk.co.uk/

3. Designated Landscapes and Landscape Character

3.1 Nationally Designated Landscapes

The development site is both within and around the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) and consideration must therefore be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for the AONB. The development site is also within Suffolk Heritage Coast which is a non-statutory designation and in the vicinity of several locally designated Special Landscape Areas.

3.2 Landscape and visual impacts

Natural England would wish to see details of local landscape and seascape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.3 Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm and further information can be found on Natural England's landscape pages here.

4. Access and Recreation

Natural England is currently working on the alignment of the Aldeburgh to Hopton on Sea England Coast Path (ECP) stretch which include the section of beach which fronts Sizewell A, B and C (as proposed). Those aspects of the project proposals which are likely to affect the ECP route, such as the use of the Beach Landing Facility (BLF), may require access mitigation (e.g. a banksman to facilitate access, provision of an alternative temporary diversion route during ECP closure etc.) and this will need to be fully assessed within the EIA.

We advise that the proposals should incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should also be incorporated where appropriate.

Furthermore, the EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Overall, EDF Energy should look for opportunities to enhance access and enjoyment, especially of Suffolk Coast and Heaths AONB and Suffolk Heritage Coast, in a manner consistent with conservation of their natural beauty and the needs of agriculture, forestry and other uses.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

i) The degree to which soils are going to be disturbed/harmed as part of this development and whether BMV agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk. Natural England Technical Information Note 049 - *Agricultural Land Classification: protecting the best and most versatile agricultural land* also contains useful background information.

ii) If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level (e.g. one auger boring per hectare, or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource (i.e. 1.2 metres).

iii) Proposals for handling different types of topsoil and subsoil and the storage of soils and their management whilst in store. Reference could usefully be made to MAFF's Good Practice Guide for Handling Soils which comprises separate sections, describing the typical choice of machinery and method of their use for handling soils at various phases. The techniques described by Sheets 1-4 are recommended for the successful reinstatement of higher quality soils.

iv) The method of assessing whether soils are in a suitably dry condition to be handled (i.e. dry and friable), and the avoidance of soil handling, trafficking and cultivation during the wetter winter period.

v) A description of the proposed depths and soil types of the restored soil profiles; normally to an overall depth of 1.2 metres over an evenly graded overburden layer.

vi) The effects on land drainage, agricultural access and water supplies, including other agricultural land in the vicinity.

vii) The impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation.

viii) A detailed Restoration Plan illustrating the restored landform and the proposed afteruses, together with details of surface features, water bodies and the availability of outfalls to accommodate future drainage requirements.

ix) The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the *Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites*.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

8. Contribution to local environmental initiatives and priorities

The applicant should consider how this development can contribute to local initiatives and priorities, such as any green infrastructure strategies, strategic nature conservation solutions (e.g. the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) and any environmental enhancement schemes proposed within Suffolk Coast & Heaths AONB.

9. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Annex B: Natural England's specific comments on the Sizewell C EIA Scoping Report

Topic	Section	Comment
General approach/ overarching issues	2.2.14	EDF Energy[3] will need to apply for consents for works within an SSSI.
	2.2.14	EDF Energy should identify those Protected Species Licenses that will be required at the earliest opportunity.
	2.3.3	Natural England has fully engaged with EDF Energy throughout Stage 1 (2013), Stage 2 (2017) and Stage 3 (2019) of the pre-application process on the development of the shadow HRA/report to inform the Appropriate Assessment (RIAA) and the associated evidence/assessment process. However, we understand that we will not be provided with the opportunity to review and feed back to EDF Energy on a draft of this report ahead of the DCO application submission which is disappointing given the significant level of input from us over this period of time.
	3.2.14	The decision on whether to adopt a rail-led or road-led transport strategy should take into account the respective environmental impacts associated with each strategy and progress with the least damaging option in this respect; until such time as this decision is made, the full impacts of each strategy must be assessed as is proposed in the EIA scoping report.
	3.3.2	We have recently provided advice to EDF Energy in our response to the Stage 3 consultation under Section 42 of the Planning Act 2008 (our ref: 272181, dated 29th March 2019). This included detailed advice on the development as a whole and the individual elements of the proposals with respect to the key interests within our remit. We have attached this full response in **Annex C** below for your reference. It should be noted that we continue to engage with EDF Energy on the significant number of outstanding issues highlighted in that response ahead of the DCO submission.
	3.3.5	With regards to new temporary development, as a 'worst case scenario', we question whether this should also include the temporary rock jetty which may be used for construction. Clarification is therefore needed on this point.
	3.3.6	The description of the main development site permanent elements under marine works and associated infrastructure should include the soft Coastal Defence Feature (sCDF) in front of the Hard Coastal Defence Feature (hCDF) which will have to be nourished and replaced during the life time of the project (construction, operation and decommissioning). This will be a permanent aspect of the project and clarification is therefore needed on this point.
	3.3.6	The Fish Recovery and Return (FRR) system should be included within the permanent development as part of the marine works and associated infrastructure.
	3.3.6 and 3.3.7	Capital and maintenance dredging is not currently identified as a temporary or permanent aspect of the project under the marine works and associated infrastructure. Clarification is therefore needed on this point.
	Figures 3.1 – 3.38	These figures are largely focussed on the terrestrial elements of proposed development and do not illustrate the proposed marine components of development in any detail. This therefore needs to be addressed and the relevant figures included in the EIA.
		These figures do not illustrate the various elements of the

[3] NNB Generation Company Limited, whose registered office is 90 Whitfield Street, London, W1T 4EZ (referred to in this document as 'EDF Energy').

		proposed development in the context of the significant environmental constraints within which they are proposed, including the internationally and nationally important designated sites for wildlife and landscapes (i.e. SACs, SPAs, Ramsar sites, SSSIs and AONBs). This therefore needs to be addressed and the relevant figures included in the EIA.
	3.3.10	Further detail is required on when within the Construction Phase the Combined Drainage Outfall (CDO) would be constructed and the resultant impacts on water quality
	3.3.28	We welcome that the Outline Construction Environmental Management Plan (OCEMP) will be submitted with the EIA and encourage EDF Energy to provide to the relevant statutory nature conservation bodies (SNCBs), including Natural England, for comment at the earliest opportunity to allow for frontloading prior to the examination process.
	3.3.41	Gaseous emissions does not currently include emissions from transport vehicles during construction, operation and decommissioning. Clarification is therefore needed on this point.
	3.3.48	Welcome that the decommissioning period will be considered within the EIA.
	3.12.10	The report states that *"The Interim Spent Fuel Store would be designed for a life of at least 100 years and may extend beyond the operational life and decommissioning of the other facilities on-site".* Natural England advise that consideration of the Interim Spent Fuel Store is provided within the EIA in relation to potential environmental effects, in particular the coastal geomorphology of the area and future baselines.
	4.3.3	We welcome that EDF Energy's preferred option for the SSSI crossing design to be taken forward into the DCO application (i.e. culvert with embankment) will be fully justified in terms of the environmental constraints where less damaging alternatives options are available in this respect (e.g. three span bridge design). See section 4.6.2 of our Stage 3 response in **Annex C** for further detailed advice on this issue. However, we advise that similar environmental appraisals and consideration of alternatives should also be undertaken for the: • Water management zone (WMZ) locations (i.e. specifically the WMZ which is close to Minsmere and an important natterjack toad population) • Spoil management proposals, including stockpile areas and borrow pits (see paragraphs 4.6.7.6 – 4.6.7.7 of our Stage 3 response in **Annex C** for further detailed advice on this issue) • Training building location (see paragraph 4.6.9.3 of our Stage 3 response in **Annex C** for further detailed advice on this issue) • Sizewell B relocated facilities location (see paragraph 4.6.14.3 of our Stage 3 response in **Annex C** for further detailed advice on this issue) • Length location and design of the FRR (see paragraph 4.6.3.4 of our Stage 3 response in **Annex C** for further

		detailed advice on this issue)
	5.2.1	We welcome that the spatial scope is based on Zone of Influence (ZoI) of receptors.
	5.2.2	We note that some points refer to the temporal scope of the EIA as construction and operation (e.g. 5.2.2), while some aspects state will consider decommissioning (e.g. 5.2.5 and 5.2.6) . Natural England have previously advised within Expert Topic Groups (ETG) and within our Stage 3 consultation response that the decommissioning phase be included within the EIA. We would also advise that consideration is given to the potential effects of maintenance of the Interim Spent Fuel Store, which may be present beyond decommissioning. Clarification should be provided on whether decommissioning will be considered for all aspects of the projects throughout EIA.
	5.2.3	Natural England seek clarification regarding 5.2.3 stating that the future baseline "*will likely cover the first year of operation"*. We advise that the future baseline be considered against the lifetime of the project including decommissioning as discussed within the ETG.
	5.3.4, Table 5.1	We advise that the value/sensitivity column in this table should be split for clarity
		We welcome that internationally and nationally important SACs, SPAs, Ramsar sites, SSSIs and AONBs are recognised as being of 'High' value/sensitivity within this table. However, we advise that this category should also include S41 Habitats of Conservation Importance under the Natural Environment and Rural Communities (NERC) Act 2006; as nationally important habitats and species, we note these are given a 'High' value elsewhere in the report (e.g. in Table 6.26) so this needs amending here to ensure consistency of approach.
	5.3.6, Table 5.4	In addition to the 'national/regional' objectives, we advise that the effect descriptions here should include consideration at the International/European site level (i.e. SACs, SPAs and Ramsar sites), where adverse effects on site integrity and/or the coherence of the network may occur as a result of the proposals.
	5.3.7	It should be noted that classification of the terms 'significant' and 'not significant' have a different criteria within an EIA and HRA context. This should therefore be made clear in the EIA
	5.4	In general, it should be ensured that all mitigation follows the avoidance-mitigation-compensation hierarchy and that these are clearly distinguished between.
		In the context of the HRA, it should be ensured that the mitigation approach is in line with all relevant European case law.
		In the context of the HRA, it should also be noted that monitoring is not mitigation; only when there is sufficient certainty and agreement with SNCBs that all proposed mitigation is satisfactory in terms of the key mitigation tests should monitoring be used to confirm that these mitigation measures are working and provide an early trigger for any necessary adaption of the mitigation. If monitoring is proposed, this should include clear reference to the trigger points and mitigation.
	5.5.3	Natural England has already commented on the process for scoping of other projects in our response to Stage 3 consultation (see **Annex C** for further detail).
	5.5.4	Inter relationship effects on a receptor should consider synergistic effects. We advise that the assessment of negligible

		residual effects should be in line with the Waddenzee Judgement. If a plan or project would not be likely to have a significant effect on the site alone, it should nevertheless be considered in combination with other plans and projects to establish whether there would be likely to be a significant effect arising from their combined impacts.
	5.7.2, Table 5.5.	If residual effects are identified within the EIA following consideration of mitigation, then another section on compensation should be included here as per the avoidance-mitigation-compensation hierarchy.
Noise and Vibration	6.4	In the context of our remit, noise modelling should include assessment of impacts to sensitive ecological receptors where necessary, including sensitive internationally and nationally designated site features (e.g. breeding and non breeding bird features, marine mammals etc.) and protected species (bats etc.).
		See the following paragraphs of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ paras 4.5.40 – 4.5.47 (project as a whole) ▪ para 4.6.15.3 (helipad) These comments should be addressed and incorporated within the final EIA.
Air quality	6.5	In the context of our remit, the air quality section of the EIA should include assessment of impacts from increased traffic (NOx emissions) and fugitive dust to sensitive ecological receptors where necessary, including to sensitives internationally and nationally designated site features.
		See the following paragraphs of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ paras 4.5.52 – 4.5.55 (project as a whole) These comments should be addressed and incorporated within the final EIA.
Landscape and visual	6.6	In the context of our remit, the landscape and visual impact assessment (LVIA) should include assessment of impacts to sensitive landscape receptors where necessary, including the nationally designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).
		See the following paragraphs of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ paras 4.5.58 – 4.5.62 (project as a whole) ▪ paras 4.6.1.9 – 4.6.1.12 (main power station platform) ▪ paras 4.6.2.28 – 4.6.2.29 (SSSI crossing) ▪ paras 4.6.4.11 – 4.6.4.12 (BLF) ▪ para 4.6.5.10 (coastal defence features) ▪ para 4.6.6.2 (northern mound) ▪ paras 4.6.7.6 – 4.6.7.8 (spoil management proposals) ▪ para 4.6.8.5 (staff accommodation) ▪ para 4.6.9.3 (training building) ▪ para 4.6.10.3 (emergency equipment store and backup generator) ▪ paras 4.6.11.5 – 4.6.11.6 (new electrical substation, with associated infrastructure)

		▪ para 4.6.13.2 (site entrance hub, contractor compounds and shared facilities areas, access road and haul road) ▪ para 4.6.14.4 (relocation of Sizewell B facilities), 4.6.16.7 (two village bypass) ▪ para 4.6.17.6 (Yoxford roundabout) ▪ para 4.6.18.2 (Sizewell Halt rail terminal) ▪ para 4.6.19.7 (park and ride sites) ▪ para 4.7.1.8 (Sizewell Link Road (SLR)) ▪ para 4.7.2.7 (freight management facility) ▪ para 4.7.3.3 (railway upgrades and improvements 1) ▪ para 4.8.1.8 (green rail route) ▪ para 4.8.2.4 (railway upgrades and improvements 2) ▪ para 4.8.3.7 (Theberton bypass) These comments should be addressed and incorporated within the final EIA.
Terrestrial Ecology and Ornithology	6.7	In the context of our remit, the EIA should include assessment of impacts to all relevant sensitive ecological receptors, including internationally and nationally designated sites, based on robust and up-to-date survey data. We advise that the surveys to inform the various impact assessments should be considered in the context of the recent Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note on the Lifespan of Ecological Reports and Surveys which states that, for surveys which are more than three years old, "*The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated*". Where the baseline survey information is not in line with this, we advise that clear justification should be provided on how the surveys remain valid and robust enough to inform assessment conclusions. For example, for a major development of this scale in such a highly sensitive environment and bearing in mind the length of time the project has been under consideration, we would expect the ornithological project-specific surveys to be in line with best practice for both breeding and non breeding species. We welcome EDF Energy's commitment to enhance the landscape, biodiversity and recreational value of the wider EDF Energy estate, including a specific commitment to producing a long-term Landscape and Ecology Management Plan (LEMP) which, in part, plans to return arable land within the EDF Energy estate back to 'Suffolk Sandlings' acid grassland and heathland post-construction. In a wider context, we advise that the development should commit to delivering biodiversity net gain and that baseline habitat surveys should be used to inform and evidence conformity with this principle. See paragraphs 3.9.29 - 3.9.41 of our Stage 3 response in **Annex C** for further detailed advice on this.
		See the following paragraphs and sections of our Stage 3 response in **Annex C** for further detailed advice on the scope of these topics: ▪ paras 3.9.1 – 3.9.41 and section 4.5 (project as a whole) ▪ section 4.6 (individual elements of the project) These comments should be addressed and incorporated within

		the final EIA.
Amenity and Recreation	6.8.15	We welcome that the ECP has been added to the baseline and that consultation with Natural England will continue on this issue.
	6.8	See the following paragraphs of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ paras 3.9.42 – 3.9.47 (project as a whole) ▪ paras 4.6.4.13 – 4.6.4.20 (BLF and impacts on the England Coast Path (ECP) ▪ paras 4.6.8.2 – 4.6.8.4 (staff accommodation and associated recreational disturbance to designated sites) These comments should be addressed and incorporated within the final EIA.
Geology and Land Quality	6.11	As stated in our response to the 2014 EIA Scoping Consultation our ref: 119244, dated 22nd May 2014) a major omission from the scoping exercise remains the consideration of the water supply and treatment of wastewater that will be needed for the construction phase, both for the physical construction of buildings and structures using concrete and also to supply the campus site for the workforce that would be required on site. Potential activities that would potentially impact groundwater should include supply of water for construction activities, such as concrete batching, and supply of water to the campus site. This is a key consideration and needs to be addressed accordingly in the EIA. Any impacts of water supply for designated sites needs to be included, even if the source of water is remote from the application site. See the following paragraphs of our Stage 3 response in **Annex C** for further detailed advice on the scope of these topics: ▪ paras 4.5.28 – 4.5.39 (project as a whole) ▪ paras 4.6.1.3 – 4.6.1.8 (main power station platform) ▪ paras 4.6.2.10 – 4.6.2.20 (SSSI crossing) ▪ paras 4.6.11.2 – 4.6.11.4 (new electrical substation, with associated infrastructure) ▪ para 4.6.12.2 (water management zones) ▪ para 4.6.16.2 (two village bypass) ▪ paras 4.6.17.2 – 4.6.17.4 (Yoxford roundabout) ▪ para 4.6.19.2 (park and ride sites) ▪ paras 4.7.1.2 – 4.7.1.4 (Sizewell Link Road (SLR)) ▪ para 4.7.2.3 (freight management facility) ▪ para 4.8.1.3 (green rail route) ▪ paras 4.8.3.2 – 4.8.3.3 (Theberton bypass) These comments should be addressed and incorporated within the final EIA.
Groundwater and Surface Water	6.12	
Flood Risk	6.13	
Coastal Geomorphology and Hydrodynamics	6.14	The landward extent for coastal hydrodynamics assessment should consider future baselines for the lifetime of the project and the functionality of coastal habitats and species. The area of assessment is therefore likely to stretch beyond the current Mean High Water Spring.
	Table 6.22	National designated sites such as SSSIs with a geomorphology component are currently classified as being of 'Medium' sensitivity. Natural England advises that they should be

		considered as a 'High' sensitivity receptor.
	6.14.24	It is unclear whether the capital and maintenance dredging required for bringing in large loads will be included as a potential impact. Clarification is therefore needed on this point.
	6.14.25	It is disappointing that the designated sites and features to be included within the EIA are not clearly identified and scoped in at this point.
		The alternative positions of the intakes, outfalls and FRR and CDO should be presented within the EIA.
		The locations of scour and any potential scour protection or mattress/rock dumping should be clearly identified within the EIA.
	6.14.29	Operational impacts do not currently identify the beach nourishment or recycling that would be required throughout the lifetime of the project to protect the hard coastal defence as a potential impact. This will need to be assessed within the EIA/HRA/RIAA.
	6.14.30	Maintenance dredging activities would punch through both the inner and outer longshore bars, intermittently over the construction, operation and decommissioning phases of the development, which may impact upon geomorphology and bathymetry. We suggest that it is too early in the assessment to determine that this may cause a minor effect without providing further evidence.
	6.14.33	Natural England advises that any mitigation should follow the mitigation hierarchy. If a measure is being introduced to avoid or reduce an effect on a European site, then it can be viewed as mitigation. We also advise that EDF Energy should assess integral features of the project, mitigation and compensation in line with current case law.
		It is not currently clear why these design aspects of the project which will be required to maintain the project over its life cycle are being presented as mitigation in respect to the EIA/HRA/RIAA.
		Interrelationships should also include the impact of the temporary rock platform if installed, the CDO, FRR, dredging and scour protection.
	6.14	See the following paragraphs and sections of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ paras 4.5.13 – 4.5.14 (project as a whole) ▪ section 4.6.3 (marine infrastructure) ▪ section 4.6.4 (BLF) ▪ section 4.6.5 (coastal defence features) These comments should be addressed and incorporated within the final EIA.
Marine Water and Sediment Quality	6.15.9	The Study area should extend as far as necessary to include the worst case scenario zone of influence for thermal and chemical plumes; not just to the spatial extent of the proposed cooling water infrastructure, and the worst case sediment suspension in accordance with modelling.
	6.15.10	It is not clear from the updates to the baseline whether any further water or sediment samples have been collected and analysed since 2015. Clarification is therefore needed on this point.
	6.15.15	The assessment methodology does not currently identify the EIA and HRA guidance regarding thermal standards and does not

		consider whether water and sediment quality may have a likely significant effect (LSE) on European site features of interest.
	6.15.18	Within the EIA and HRA, EDF Energy will also need to assess the sensitivity of the receptor.
	6.15.21	We welcome that any commissioning discharges will also be accounted for and assessed and seek clarification as to whether this will be through the CDO.
		Consideration should be given to Bentonite or drilling surfactant breakout and a Breakout Management Plan provided as part of the DCO.
	6.15.23	Elevated suspended sediment concentrations (SSC) should be considered as a worst case scenario of consecutive works, against the Conservation Objectives of designated sites and species. Maintenance dredging will be required throughout the operational and decommissioning phases and so will be necessary to consider inter-project effects.
		The scoping identifies elevated suspended sediment levels over a period of days and therefore does not accurately represent the in combination and long-term impacts of repeated increases in SSC.
	6.15.29	Waste water or sediments from drilling the horizontal tunnels, and drilling muds should be put through sediment settling tanks and screened as appropriate and their management should be clearly outlined in the EIA, HRA and CoCP.
		There is currently no mention of inclusion of a worst case scenario with regards to water and sediment quality, for example working on two reactors.
	6.15.35	Operational discharges should be assessed against thermal elevations in relation to future baselines for the operational and decommissioning phases of the proposed development.
	6.15.37	Thermal elevation, should be assessed against the future baseline and the SAC/SPA thermal criteria.
	6.15.43	We welcome that the FRR will be assessed using the same screening approach. However, we seek clarification within the EIA as to whether the FRR will be chlorinated as suggested in the scoping report, or not as suggested at the recent Marine Technical Forum (MTF) on the 18th June 2019.
	6.15	See the following sections of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ section 4.6.3 (marine infrastructure) ▪ section 4.6.4 (BLF) These comments should be addressed and incorporated within the final EIA.
Marine Ecology	6.16.9 and 6.16.10	The Study area is identified in 6.16.9 as being the seaward boundary extending to the eastern flank of the Sizewell-Dunwich Bank, to include the spatial extent of the proposed cooling water infrastructure. However, 6.6.10 identifies a number of zones of influence which extend beyond the Sizewell Dunwich bank. Clarification and consistency is therefore needed on this point.
	6.16.11	We welcome that the relevant assessments will consider receptor specific effects, particularly with regard mobile species such as marine birds and mammals.
	Table 6.25	Orford Inshore MCZ was designated on the 31st May 2019. This therefore needs updating in the EIA.
	6.16.20	The construction phase is anticipated to last between 9 and 12

		years which in this paragraph is considered to be 'short to medium term. This conflicts with the definitions elsewhere in the report such as paragraph 6.8.23 where a construction duration of 10-25 years is considered to be 'Long-term'. We advise that duration should be considered both in relation to the effect itself and the feature's ecological cycle. For example, five years may be considered short in a human lifetime context but might span several generations for some short-lived species. The duration of an activity may differ from the duration of the resulting effect. For example, if a short-term construction impact causes disturbance to birds during their breeding period, there may be longer-term implications of their failure to reproduce that year. Clarification and consistency is therefore needed on this point.
	6.16.32	We welcome the consideration of Conservation Objectives in terms of designated sites and species. It should be noted that there is different terminology in an EIA and HRA context as to significance of effect as this distinction should be clearly made within the EIA..
	6.16.33	We note the assessment of fisheries and question whether it would be more appropriate in the socio economic section rather than the marine ecology section, with an assessment of impacts of fish within the marine ecology section.
		It is not clear whether noise and vibration will be considered in the marine ecology section as construction noise may also impact on sensitive receptors in the marine environment. Clarification is therefore needed on this point.
	6.16.48	The proposed development also needs to be assessed against future baselines, in this case potential future sea temperatures. We note that this is referred to in section 6.21.45 but advise that this should be made clear here too for consistency.
	6.16.52	As previously mentioned, consideration should be given to the project design and embedded mitigation definitions in the context of recent Habitats Regulations[4] case law.
	6.16	See the following sections of our Stage 3 response in **Annex C** for further detailed advice on the scope of this topic: ▪ section 4.6.3 (marine infrastructure) ▪ section 4.6.4 (BLF) These comments should be addressed and incorporated within the final EIA.
Climate Change	6.21	We note that the Climate Change Risk assessment will have a temporal scope of 60 years and question whether this is appropriate considering sea level rise as a climate change hazard may present a risk for the operational and decommissioning phase of the proposed development. We note that this will be considered within Nuclear Site Licensing and defer to Environment Agency guidance on this.
	6.21.89	We welcome that the climate change chapter will include a high level environmental assessment of decommissioning.
	6.21.96	We note that it is currently not proposed to assess cumulative effects relating to CCR, and question whether climate change

[4] The Conservation of Habitats and Species Regulations 2017

		risks to the project will be adequately considered. For example, in combination sea level rise, water temperatures and increased storminess and wave height may necessitate increased soft coastal defences for the project, and may have potential knock on effects for designated sites.

Annex C – Natural England's advice to EDF Energy on the Sizewell C – Stage 3 Consultation: 4th January 2019 to 29th March 2019 under Section 42 of the Planning Act 2008

Date: 29 March 2019
Our ref: 272181
Your ref: SZC Stage 3

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Jim Crawford
Sizewell C Project Development Director

sizewell@edfconsultation.info

BY EMAIL ONLY

Dear Mr Crawford

Sizewell C – Stage 3 Consultation: 4th January 2019 to 29th March 2019 under Section 42 of the Planning Act 2008

Thank you for seeking our advice on Stage 3 of the Sizewell C project in your consultation dated 04 January 2019 which we received the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are pleased to attach our advice and comments in relation to the above consultation in a number of Annexes below, as follows:

- **Annex 1 – Status and functions of Natural England** (pg. 2)
- **Annex 2 – Context of the Stage 3 consultation** (pg. 3)
- **Annex 3 – Natural England's summary advice on the Stage 3 consultation documents** (pp. 4 – 15)
- **Annex 4 – Natural England's detailed advice on the Stage 3 consultation documents** (pp. 16 – 58)

Please note that all comments in this response are made without prejudice to any future comments we may wish to make on all Sizewell C-related consultations.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Jack Haynes on 0208 02 64857. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Jack Haynes
Lead Adviser
Norfolk & Suffolk Area Team

Andy Millar
Senior Adviser
Norfolk & Suffolk Area Team

Cc: **Environment Agency (EA) –** Neil Dinwiddie, Simon Barlow
Marine Management Organisation (MMO) – Lauren O'Connell, Edward Walker

Annex 1: Status and functions of Natural England

1.1 Natural England is a statutory body established under the Natural Environment and Rural Communities Act 2006 (the NERC Act). Natural England is the statutory advisor to Government on nature conservation in England and promotes the conservation of England's wildlife and natural features. It is financed by the Department for Environment, Food and Rural Affairs (Defra) but is a Non-Departmental Public Body which forms its own views based on the best scientific evidence available.

1.2 Section 2 of the NERC Act provides that Natural England's statutory general purpose is:

"… to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development."

Section 2(2) states that Natural England's general purpose includes –

- promoting nature conservation and protecting biodiversity;
- conserving and enhancing the landscape;
- securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment;
- promoting access to the countryside and open spaces and encouraging open-air recreation; and
- contributing, in other ways, to social and economic well-being through management of the natural environment.

1.3 Natural England is also a statutory consultee in respect of plans and projects subject to the requirements of the various Environmental Impact Assessment (EIA) Regulations in England, proposals likely to damage any of the flora, fauna or geological or physiographical features for which a Site of Special Scientific Interest (SSSI) has been designated, and plans or projects likely to have a significant effect on any European site. European sites include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) or sites listed under the 1971 Convention on Wetlands of International Importance (Ramsar sites). In addition, Natural England exercises additional duties with regards to SSSIs under the Wildlife and Countryside Act 1981 (as amended) and in relation to European sites under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').

Annex 2: Context of the Stage 3 consultation

2.1 EDF Energy[5] intends to apply for a Development Consent Order (DCO) for a new nuclear power station at Sizewell in Suffolk (known as Sizewell C) together with associated development located both on and off-site. This consultation represents Stage 3 of the pre-application consultation under Section 42 of the Planning Act 2008 and Natural England's views are sought on the project proposals and options as outlined in the consultation documents.

2.2 Natural England has previously provided comments on the Stage 1 and Stage 2 consultations (letters dated 6th February 2013 and 2nd February 2017, our refs: 71859 and 202551 respectively) and, in doing so, has had regard to relevant National Policy Statements (NPS) including the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Nuclear Power Generation (EN-6). We continue to have regard for the national planning policy context of the project.

2.3 Natural England is continuing to work with our sister organisations in Defra, namely the Environment Agency and Marine Management Organisation, in order to provide complementary advice. We recognise that our statutory remits overlap for particular environmental considerations in relation to designated sites, for instance freshwater hydrology and coastal processes. In these instances, we aim to work together to provide you with our best advice, based on sound science and evidence, whilst having regard to our respective remits. We also continue to engage with Suffolk County Council, the Local Planning Authorities, the local Area of Outstanding Natural Beauty (AONB) unit and other key local stakeholders.

[5] NNB Generation Company (SZC) Limited

Annex 3: Natural England's summary advice on the Stage 3 consultation documents

3.1 Natural England advises that the impacts from the project, as proposed, on ecology and landscape are closely interrelated and potentially significant. For example, the designated wetlands of Minsmere-Walberswick Heaths and Marshes and Sizewell Marshes are both internationally and nationally important habitats and prominent landscape features within the nationally designated Suffolk Coast and Heaths AONB. This means that the protection of such sites and a carefully planned strategy for the Sizewell Estate should provide combined mitigation in respect of both wildlife and landscape. This understanding has guided our review of the consultation documents, notably on the proposals for the SSSI crossing and the masterplanning for the wider EDF Energy Estate.

3.2 EDF Energy has presented two potential strategies for the movement of bulk materials and containerised goods to and from the Main Development Site (MDS) at this stage, namely a road-led strategy and a rail-led strategy. We note that the marine-led strategy which was presented as a potential delivery option at Stage 2 has now been discounted and that the significant environmental constraints which became apparent were a key consideration in making this decision (**Volume 1 – Development Proposals** document, hereafter referred to as **Vol 1**, para 1.2.2, pg. 6 and para 5.1.6, pg. 86). We welcome that these constraints, in particular potential impacts on the marine environment from the construction of a large jetty or Marine Offloading Facility (MOLF), have been taking into account when making this decision and advise that this decision-making process should be clearly outlined within the relevant section of the final DCO application documents.

3.3 Nevertheless, the project as proposed through both the road-led and rail-led strategies involves a number of significant elements which will have differing ecological and landscape implications that must be fully considered. The key elements of the project within the MDS and Associated Development (AD) sites as proposed through these strategy options are:

Under both the road-led and rail-led strategies

- Main power station platform proposals, with associated infrastructure including electrical connections (overground)
- Sizewell Marshes SSSI crossing and realignment of the Sizewell Drain
- Beach landing facility (BLF)
- Coastal Defence Features (CDFs) – hard CDF (hCDF) and soft CDF (sCDF)
- Combined Drainage Outfall (CDO), cooling water infrastructure and Fish Recovery and Return (FRR) system
- Northern mound
- Spoil management proposals, including stockpile areas and borrow pits
- Accommodation campus
- Visitor centre
- Training building
- Combined Heat and Power (CHP) plant
- New substation, with associated infrastructure including electrical connections (underground)
- Water management zones
- Site entrance hub
- Contractor compound and shared facilities area

- Access road
- Haul road
- Relocation of Sizewell B facilities
- Temporary caravans for construction workers on Land East of Eastlands Industrial Estate (LEEIE)
- Helipad
- Two village bypass
- Yoxford roundabout
- Use of Sizewell Halt rail terminal for delivery of construction materials to the main development site in the early years or construction of a new rail siding adjacent to the existing branch line in the LEEIE
- Park and ride sites at Wickham Market (southern park and ride) and Darsham (northern park and ride).

Under the road-led strategy only

- 'Sizewell link road' (SLR)
- Freight management facility (lorry holding area)
- Upgrades and improvements along the Saxmundham-Leiston branch line and on the East Suffolk Line, including some upgrades to level crossings

Under the rail-led strategy only

- 'Green rail route' for delivery of construction materials directly to the main development site
- Upgrades and improvements along the Saxmundham-Leiston branch line and on the East Suffolk Line, including some closures and upgrades to level crossings which will also include some rights of way diversions
- Theberton bypass

3.4 The consultation documents state that, taking account of the considerable environmental sensitivities of the local area and based on the Stage 2 consultation feedback, EDF Energy "*have carried out work to develop our proposals in a way which maximises the benefits and minimises the harm caused by the project, in line with our vision* [and have] *continued to collect environmental information to identify any significant environmental effects that may arise in connection with the project*" (**Vol 1***,* para 1.1.5, pg. 2). However, we note that Natural England's advice on the various options presented at Stage 2 (2017) for some key aspects of the proposals in terms of ecological and landscape risks has not been taken forward into Stage 3 which is very disappointing. This includes, for example, our preferred options for the SSSI crossing (see our detailed advice under section 4.6.2 below) and the soil stockpile locations (see our detailed advice under section 4.6.7 below).

3.5 Throughout the environmental assessments, we advise that the potential for ecological and landscape impacts must be considered at the whole project level (i.e. assessed cumulatively and 'in combination') rather than solely assessing each individual element in isolation. The proposals must also be considered cumulatively and 'in-combination' with other relevant plans or projects. Such assessments should be clearly outlined in terms of temporary and permanent impacts during the construction, operation and decommissioning (where appropriate, e.g. removal of temporary works) stages of the project and should be set out against the detailed baseline information for all sensitive ecological and landscape receptors.

3.6 The project must clearly demonstrate adherence with the avoidance-mitigation-compensation hierarchy, including consideration of alternatives, for all sensitive receptors including designated sites (i.e. SACs, SPAs, Ramsar sites and SSSIs) and protected landscapes (i.e. AONBs). In addition, the project should also demonstrate how it will result in an overall 'net gain' for the environment.

3.7 In this context, we welcome that the various options which have been proposed at Stage 3 have been assessed to a degree within the preliminary environmental information (PEI) provided at this stage (**Volume 2A - Preliminary Environmental Information**, **Volume 2B - Preliminary Environmental Information** and **Volume 3 - Preliminary Environmental Information Figures**, hereafter referred to as **Vol 2A**, **Vol 2B** and **Vol 3** respectively).

3.8 However, as is acknowledged by EDF Energy, the assessments and conclusions on various topics as presented in the PEI are subject to change as the outstanding assessments progress ahead of EDF Energy's application for DCO (**Vol 2A**, para 1.1.7, pg. 1) which we understand is currently scheduled for January 2020.

3.9 With this is mind, Natural England's advice at this stage is that significant gaps and uncertainties remain. Given the very tight timescales within which these outstanding complex assessments must be carried out and the conclusions confirmed ahead of DCO application, we advise that this presents significant risks both to the natural environment and EDF Energy from an environmental perspective. These gaps will need to be fully addressed within the final environmental impact assessments which will form the full Environmental Statement (ES) and be submitted as part of the DCO application. Our advice on these gaps, based on the information provided, is further detailed throughout the sections below and we are keen to progress all significant outstanding issues with EDF Energy at the earliest possible opportunity.

Impacts on internationally designated sites (i.e. SACs, SPAs, Ramsar sites[6])

3.9.1 As you are aware, the project proposals within the MDS and AD sites have the potential to impact on a number of European designated sites (also commonly referred to as Natura 2000 sites or N2K sites) and their notified interest features through numerous impact pathways, both directly and indirectly. European sites are afforded the highest level of protection under the Habitats Regulations. At this stage, based on the information provided to date, we consider that the project proposals include terrestrial and marine elements which have the potential to impact on the following sites:

- Alde-Ore and Butley Estuaries SAC
- Alde-Ore Estuary SPA and Ramsar site
- Benacre to Easton Bavents Lagoons SAC
- Benacre to Easton Bavents SPA (*note*: there is no Ramsar site at Benacre as is stated within the consultation documents (**Vol 2A**, para 2.3.3, pg. 22))
- Dew's Ponds SAC
- The Humber Estuary SAC
- Minsmere to Walberswick Heath and Marshes SAC
- Minsmere- Walberswick SPA and Ramsar site
- Orfordness-Shingle Street SAC
- Outer Thames Estuary SPA

[6] SACs, SPAs and Ramsar sites; the latter are listed or proposed Wetlands of International Importance under the Ramsar Convention and are protected as a matter of Government policy. Paragraph 176 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.

- Sandlings SPA
- Southern North Sea SAC (*note*: this site was formally designated in February 2019 so is no longer a candidate SAC (cSAC) as referred to in the PEI e.g. **Vol 2A**, para 2.15.5, pg. 128)
- Staverton Park and the Thicks, Wantisden SAC
- Stour and Orwell Estuaries SPA and Ramsar site
- The Wash and North Norfolk Coast SAC

3.9.2 We have recently provided EDF Energy with pre-application advice on the Habitats Regulations Assessment (HRA) screening report which included advice on the European sites to be screened in for assessment where potential pathways for 'likely significant effects' (LSE) are identified; we advise that this should be reflected within the final ES as the PEI does not currently align with this (e.g. **Vol 2A**, para 2.3.3, pg. 22).

3.9.3 In considering the European site interests Natural England advises that, under the provisions of the Habitats Regulations, you must have regard for any potential impacts that the project may have[7]. The Conservation Objectives and Information Sheets on Ramsar Wetlands for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts the project may have.

3.9.4 The marine elements of the project will occur within the Southern North Sea SAC, identified for the Annex II species harbour porpoise (*Phocoena phocoena*) and in the Outer Thames Estuary SPA. Natural England advises that the proposed development should be assessed against the Draft Conservation Objectives and Advice on Activities for the Southern North Sea SAC which are due to be updated to full Conservation Objectives imminently.

Habitats Regulations Assessment (HRA)

3.9.5 The consultation documents provided at this stage do not include sufficient information to demonstrate that the requirements of Regulations 63 and 64 of the Habitats Regulations have been considered i.e. the consultation does not include a shadow HRA.

3.9.6 On the requirements relating to a shadow HRA, it is Natural England's advice that the project proposal is not necessary for the management of the European sites listed above. You must therefore provide information sufficient to enable the determination of whether or not the project proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment (AA) stage where significant effects cannot be ruled out. Natural England advises that there is currently insufficient information to determine whether LSE, and subsequently adverse effects on integrity (AEOI), can be ruled out for a number of impacts pathways to a number of European designated sites.

3.9.7 Consideration should be given to recent case law in the determination of LSE, mitigation, compensation and residual effects. Where potential impacts pathways for LSE are identified from the project proposals to a designated site, then an AA must be undertaken prior to consideration of mitigation. To support the AA, developers are required to provide a report to inform the AA (RIAA) which should draw a distinction between:

[7] Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.
The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/

- Protective measures intended to avoid or reduce any adverse effects that the project may have on the site, which are considered in the AA required by Article 6(3)
- Measures that are aimed at compensating for the negative effects of the project on a European site, which are required by Article 6(4).

3.9.8 In this context, we advise that any screening/assessment conclusion presented within the PEI which relies on embedded mitigation will need to be revisited in the final ES/shadow HRA/RIAA as necessary (e.g. **Vol 2A**, para 1.3.1, bullet point (b), pg. 5 and para 1.5.3, pg. 8).

3.9.9 Furthermore in light of recent case law, we advise that any risk of a reduction in, or loss of, a terrestrial or marine European site should be judged to be a LSE, and the full significance of its impact on a site's integrity should be further tested through an AA. This principle should be applied to all terrestrial and marine SACs, SPAs, pSPAs, cSACs and Ramsar sites. An AA must examine the predicted loss in more detail, clearly identifying whether or not it would affect the habitats or supporting habitats of the European site's qualifying features within that site.

3.9.10 As previously advised, should Sizewell C be granted permission, Natural England considers that impacts to European designated sites must be fully avoided, mitigated or compensated for. Although the PEI includes some detail on this in principle, it is Natural England's advice that there is insufficient information provided for us to provide detailed advice in this context. The final ES should contain sufficient information to ensure that fully evidenced decisions can be made with confidence in the assessment of effects to European designated sites. Our detailed advice on the further information requirements is included throughout the sections below within Annex 4.

3.9.11 As highlighted within our Stage 2 comments, we appreciate EDF Energy's willingness to follow the Evidence Plan process in relation to European site impacts. However, we note that the latest Evidence Plan was published over three years ago. Natural England would therefore welcome an opportunity to work with the EDF Energy on an updated revision of the Plan and we suggest that this is done in the near future (to reflect recent changes in case law etc.). We therefore look forward to reviewing this in the light of the most recent studies.

Conclusion

3.9.12 **Throughout Stage 1 (2013) and Stage 2 (2017), Natural England has continued to advise EDF Energy on the development of the shadow HRA, mainly through a series of developer-led workshops, to help ensure that the project proposals are compliant with the Habitats Regulations. However, a number of uncertainties remain at Stage 3 and until such time as the shadow HRA has been completed and the conclusions confirmed, AEOI of European designated sites arising from the project as proposed cannot be ruled out. We look forward to being consulted on the draft shadow HRA in due course and would respectfully request that we are allowed sufficient time to comment prior to the submission of an application for development consent. We advise that the *Planning Inspectorate's advice note 10 'Habitats Regulations Assessment relevant to nationally significant infrastructure projects'*[8] should be followed in the preparation of the shadow HRA.**

Impacts on nationally designated sites (i.e. SSSIs)

3.9.13 As we have previously advised, should Sizewell C be granted permission, Natural England considers that impacts to Sizewell Marshes SSSI and other nationally designated sites should be kept to an absolute minimum, with a developmental design that allows the

[8] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/06/Advice-note-10v4.pdf

SSSI ecosystem to function as naturally as possible in the long term. In addition to the direct impacts which are likely to occur (e.g. loss of SSSI habitat extent), there are also likely to be indirect impacts on Sizewell Marshes SSSI and on the adjacent wetland habitats of Minsmere to Walberswick Heaths and Marshes SSSI.

3.9.14 Although the PEI includes some details of how impacts to nationally designated sites could be avoided, mitigated or compensated in principle, these have not yet been fullyconfirmed. For example, we note the habitat creation at Aldhurst Farm which may act as compensation for loss of SSSI reedbed ('tall herb fen') and the proposals to develop compensation for loss of SSSI fen meadow habitat. However, the final decision about whether compensatory habitat provision is satisfactory can only be made when all impacts are known and fully quantified.

Conclusion

3.9.15 **Throughout Stage 1 (2013) and Stage 2 (2017), Natural England has continued to advise EDF Energy on those elements of the project which have the potential to adversely impact on SSSIs. Again, this has mainly been through a series of developer-led workshops to help ensure that the project proposals are fully compliant with the Wildlife and Countryside Act, 1981 (as amended) and the Countryside and Rights of Way Act 2000 (CRoW Act 2000). Until such time as the final ES has been completed and the conclusions confirmed, adverse effects on SSSIs cannot be ruled out. We look forward to further review of this in the light of the most recent studies and to commenting on the draft ES in this regard.**

<u>Impacts on protected species</u>

General

3.9.16 The PEI states that "*The baseline environment for terrestrial ecology and ornithology (including freshwater habitats and related species) has been prepared following an extensive suite of ecological surveys and desk studies. The full ecological baseline will be presented in the ES that will accompany the application for development consent"* (**Vol 2A***,* para 2.3.2, pg. 22) which we welcome*.*

3.9.17 It should be noted that, at the Stage 2 consultation, with regards to protected species we advised that "*Natural England is the licensing authority for certain species protected under European and domestic legislation. Prior to Development Consent Order (DCO) submission, we expect that further discussion will take place between Natural England and EDF Energy to determine the licensing requirements for protected species affected by the project".*

3.9.18 To date we have not been presented with full detailed survey data for the majority of protected species. Although the PEI includes some detail on this in principle, it is Natural England's advice that without seeing more detailed and up-to-date survey information it is not possible for us to provide extensive comments at this stage in relation to protected species.

3.9.19 A European Protected Species (EPS) licence is required for any construction activity which carries the risk of significant disturbance or injury. An HRA will be considered for all new developments (coastal and marine) using pile driving within the site. If additional mitigation (to that required under EPS licence) is required, planning and management of pile driving activities may be needed within the site to ensure the Conservation Objectives are met. An in combination assessment must also be completed considering other projects in the area. If several developments will be causing disturbance or displacement effects a strategic solution may be necessary to manage the area from which porpoise are excluded.

Conclusion

3.9.20 **Throughout Stage 1 (2013) and Stage 2 (2017), Natural England has continued to advise EDF Energy on the elements of the project which have the potential to adversely impact on protected species. Again, this has mainly been through a series of developer-led workshops, to help ensure that the project proposals are fully compliant with the Habitats Regulations, the Wildlife and Countryside Act, 1981 (as amended) and The Protection of Badgers Act 1992. We are unable to provide further detailed comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.**

Impacts on nationally protected landscapes (i.e. AONBs):

General comments

3.9.21 Natural England's landscape advice for Sizewell C concerns the nationally designated landscape of the Suffolk Coast and Heaths AONB. In our response to the Stage 2 consultation we stated that: "*The new power station is a major development scheme in any context but it presents a particular challenge to the highly sensitive and nationally important landscape of an AONB".*

3.9.22 Should permission be granted, our priority is to ensure that the statutory purpose of the AONB (i.e. to conserve and enhance the natural beauty of the area) is maintained as far as possible through the design, construction and operation of the power station. Our primary focus in this respect is therefore on the main construction site and those parts of the scheme located outside the AONB but within its immediate setting. In reviewing the Stage 3 consultation documents we have referred to the Landscape and Visual Amenity Design Principles agreed for the project.

3.9.23 There is no doubt about the impact of the construction phase on the landscape fabric of this part of the AONB. The main construction site will, except for some retained features, be completely altered. Lighting and noise will alter the character of the area for the duration of construction. This very large and very active construction project could communicate its presence across a large area. Those visiting the AONB to enjoy its natural beauty will be especially sensitive to noise or activity which intrudes on their perception of the area and conflicts with their expectations of what the area should offer in terms of landscape character and relative tranquillity. The Landscape and Visual Impact Assessment (LVIA) can and should assess this.

3.9.24 We remain disappointed that the overall design of the power station is unable to complement the design of Sizewell B, notably its iconic white clad dome. The Stage 3 consultation reiterates the operational and safety reasons why this is not possible. This does, however, underline the importance of maximising other mitigation measures to reduce as far as possible the impact of this scheme on the AONB. Of particular importance will be the reinstatement of the wider EDF Energy estate and strategy for this (see our detailed advice on this under paragraphs 3.9.29 – 3.9.41 below). This has the potential to produce a landscape which contributes positively to the AONB, strengthen the landscape fabric of the area and so improve its capacity to accommodate the power station. Realising the full potential of the wider estate in this way is the only means of achieving any landscape net gains from the Sizewell C project.

3.9.25 The PEI recognises that some significant adverse landscape impacts could last for up to ten years (**Vol 2A***,* para 2.2.30, pg. 16). That is a long time to be defined as 'temporary' and could permanently alter how this part of the AONB is viewed, used and valued by residents and visitors. The PEI also concludes that some visual adverse effects would remain after all screening mitigation has become fully established (**Vol 2A***,* para 2.2.47, pg. 18). We welcome that admission because it should be a spur to identify what other

forms of mitigation might be applied.

Landscape and Visual Impact Assessment

3.9.26 The significance of the impacts of the scheme on the AONB will be addressed in much more detail through an LVIA which has not been provided at this stage. We have been consulted separately about the methodology and scope of that exercise. The effect on the defined special qualities (natural beauty indicators) of the area will be an important part of that assessment. Because the LVIA has yet to be completed, our assessment of the Stage 3 proposals cannot take its findings into account. We note that the LVIA is not listed in **Vol 2B** as one of the related assessments currently being progressed and would welcome clarification as to why this is so.

Cumulative effects

3.9.27 The cumulative effects of different parts of the scheme and with existing nuclear and related infrastructure will also be dealt with by the LVIA. We note the scope (set out in **Vol 2B**) of other confirmed, planned and anticipated developments which will be covered by cumulative impact assessment. The prospect of Scottish Power and/or National Grid siting new infrastructure in the same part of the AONB is concerning, although we understand that the preferred location for the Scottish Power substation is now outside the AONB. The character and quality of this very narrow part of the AONB, linking the two more expansive parts of the AONB north and south, is already under pressure from the energy infrastructure already in place. The implications of a combination of the new Sizewell C power station and other likely energy developments in the area should therefore be thoroughly assessed.

Conclusion

3.9.28 **Throughout Stage 1 (2013) and Stage 2 (2017), Natural England has continued to advise EDF Energy on the elements of the project which have the potential to adversely impact on the AONB. Again, this has mainly been through a series of developer-led workshops. Until such time as the full LVIA has been completed and the conclusions confirmed, the effects on the AONB cannot be fully understood and presented. We therefore look forward to the LVIA being completed so that its conclusions can be factored into the plans for the power station and measures to mitigate the impact on the AONB.**

<u>Impacts on wider ecology and landscape and implementation of the 'net gain' principle through a long term environmental legacy</u>

3.9.29 Notwithstanding the internationally and nationally important wildlife and landscapes which are likely to be affected by the development proposals (as outlined above), we advise that EDF Energy must also give consideration to the potential impacts on other wildlife and landscapes of importance (e.g. County Wildlife Sites (CWS), Local Wildlife Sites (LWS), priority habitats and species as defined within section 41 the NERC Act (2006), locally valued landscapes etc.. This is required by the National Policy Statement (NPS) for Energy (NPS EN – 1) (paras 5.3.13, 5.3.16 and 5.3.17 on pp. 71-72 and paras 5.9.14 – 5.9.17 on pp. 97-98). This should include assessment of impacts against the current baseline and consideration of any necessary mitigation/compensation for these habitats and species within the final ES.

3.9.30 In addition to ensuring that adverse effects from the project proposals to the various ecological and landscape receptors outlined above are avoided, mitigated and/or compensated for in the short-medium term (i.e. throughout construction, operation and removal of temporary works), Natural England advises that a project of this scale should also commit to providing a long-term environmental legacy for the Suffolk coast.

3.9.31 We note that EDF Energy acknowledges within the consultation documents the "*significant opportunities to maximise and support the uptake of local socio-economic benefits through targeted enhancement, initiatives and support*" (**Vol 1**, para 1.2.6, pg. 7); specifically in terms of the proposed Sizewell Link Road as a long-term socio-economic consideration, the documents state that "*After completion of the power station, it would be retained as a lasting legacy of the project*" (**Vol 1**, para 2.5.3, pg. 29).

3.9.32 Following a similar principle we advises that, as a custodian of the Suffolk Coast, EDF Energy should commit to leaving a similar environmental legacy which provides ecological and landscape benefits to people and wildlife in the long-term. This approach should tie in with a commitment to the project providing an overall environmental net gain when considered against the current baseline ecological and landscape value of the land within the red line boundaries of the project. Natural England would be keen to work with EDF Energy in order to help realise this legacy.

3.9.33 We consider that such an approach would, following completion of the project, provide significant opportunities for both socio-economic and environmental benefits through:

- Enabling wildlife to adapt to the challenges of the future including habitat fragmentation, climate change etc.;
- Providing a wealth of natural capital benefits such as flood prevention, improved air quality, improved soils, clean water etc.;
- Providing inspiration and enjoyment for people through regular access to a high quality natural environment, improving community health and wellbeing (both mental and physical). This should include enhancement of public access where practical (i.e. where it would not compromise the biodiversity interest, for example) and could also involve local stewardship of any new habitat creation;

3.9.34 We advise that this approach would be in line with:

- **The NPS for Energy (NPS EN – 1)** and **the NPS for Nuclear Power Generation (NPS EN – 6):** together these provide the primary basis for decisions on applications for development consent for nuclear projects. In particular, NPS EN – 1 acknowledges that development proposals "*provide many opportunities for building-in beneficial biodiversity or geological features as part of good design"* (EN-1, para 5.3.15, pg. 72) and that "*the applicant should demonstrate that…opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals*" (EN-1, para 5.3.18, pg. 72, also see para 5.3.4 on pg. 69).
- **The upcoming revisions to the NPSs**: The recent **government response to the revised NPS consultation in relation to net gain** states that "*the 2011 Natural Environment white paper*[9] *set out an ambition to achieve net gain for biodiversity as opposed to net loss. The recently published 25 Year Environment Plan identified actions to both strengthen the commitment to biodiversity net gain and expand the approach over time to natural capital net gain and ultimately wider environmental net gains as appropriate metrics become available. The NPS will establish the need to consider the potential to achieve biodiversity net gain and will set the context for achieving this at a strategic level without analysis of impacts on individual sites. More detailed assessment, for example based on the Defra biodiversity metric, will be undertaken as part of the DCO application*". We advise that the Sizewell C DCO application, as currently scheduled, will be submitted after the revised NPSs are in place. In this regard, we welcome EDF Energy's statement in the consultation documents that "*the ongoing EIA will be adjusted to address*

[9] https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature

any revised or additional assessment requirements defined therein provided that it is reasonable to do so within the programme and governance for the project" (**Vol 2A**, paras 1.1.19 and 1.4.2, pg. 3 and pg. 6 respectively). We hope that the above is therefore useful in giving EDF Energy some foresight on what the NPS revisions might include in terms of net gain requirements.

- **The Government's 25 Year Environment Plan**: As already mentioned, net gain is embedded in the Government's recently published 25 Year Environment Plan as a key action for ensuring that land is used and managed sustainably (see pp. 32-34 for general principles). As per the **Advice Note 11, Annex C – Natural England and the Planning Inspectorate**, *"Natural England will seek opportunities for positive environmental outcomes from major infrastructure developments. NSIPs can make a significant contribution to delivering the environmental ambition in the Government's 25 Year Environment Plan (25YEP). This aims to deliver an environmental net gain through development and infrastructure. We can help applicants and the Examining Authority to better understand and value the benefits derived from the natural environment ('natural capital'). We may advise on opportunities to secure positive environmental benefits from NSIPs. Priorities include…establishing more coherent and resilient ecological networks and providing and enhancing habitats for protected species. We can also advise on approaches and metrics that enable projects to achieve biodiversity net gain, as set out in the National Planning Policy Framework and the recent and developing National Policy Statements, and on approaches to achieving wider natural capital gains*". Furthermore, the spring statement from the Chancellor (13th March 2019) also made specific reference to mandating biodiversity net gain, in which he said: "*Following consultation, the government will use the forthcoming Environment Bill to mandate biodiversity net gain for development in England, ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity".*

- **The recent mandatory biodiversity net gain consultation**: The requirement for biodiversity net gain was also the subject of this consultation, for which an associated new metric 2.0 is to be produced imminently. The construction industry research and information association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA) recently launched **Biodiversity Net Gain Best Practice guidance** to which Natural England provided input to and further best practice guidance is expected soon. Many major infrastructure projects in the UK have now committed to delivering a biodiversity net gain and some examples of these are included in this guidance.

- The recently revised **National Planning Policy Framework (NPPF)** and the **Suffolk Coastal Final Draft Local Plan**: The consultation documents state that "*The extent to which the National Planning Policy Framework (NPPF) (Ref. 3.12) and the local development plan are deemed material is a matter for the examining authority and the Secretary of State"* and that *"the decision maker may determine that one, or both, are important and relevant*" (**Vol 1**, para 3.6.1, pg. 41). As recognised in the consultation documents, the NPPF identifies that one of the three overarching objectives to achieving sustainable development through the planning system is an environmental objective "*to contribute to protecting and enhancing our natural…environment; including making effective use of land, helping to improve biodiversity…*" (**Vol 1**, para 3.6.4, pg. 42). The revised NPPF was published on 24 July 2018 and updated Planning Practice Guidance (PPG)[10] has also been issued by the Ministry of Housing, Communities and Local Government (MHCLG) to support various aspects of the revisions. Whilst broadly maintaining existing policies to protect and enhance the natural environment, importantly, it

[10] https://www.gov.uk/government/collections/planning-practice-guidance

also includes strengthened policies on biodiversity and wider environmental net gain; specifically, planning proposals and decisions are to provide net gains for biodiversity and are to identify and pursue opportunities for biodiversity net gain (paras 170, 174,175) and wider environmental gain (paras 102, 118). The Suffolk Coastal Final Draft Local Plan also states that "*Provision should also be made for 'environmental net gain' from new or conversion development, including infrastructure developments. Considering the fact that the principle of 'environmental net gain' is strongly promoted in the Government's 25 year Environmental Plan, this should be considered an imperative provision in new or conversion development, including infrastructure developments*" (para 9.20, pg. 137). Policy SCLP10.1: Biodiversity and Geodiversity within the Natural Environment chapter also requires that "*New development should provide environmental net gains in terms of both green infrastructure and biodiversity…New development must also secure ecological enhancements as part of its design and implementation, and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal*" (pg. 156).

3.9.35 In this context, we welcome that EDF Energy has committed within the Biodiversity Stage 3 Design Principles at this stage to "*Minimise the likely significant adverse biodiversity effects and seek opportunities post-construction through retention of existing habitats, where reasonably practicable, and creation of new habitats*" and to "*Seek to retain areas of habitat connectivity and continuity as far as possible within the EDF Energy estate*". (**Vol 1***,* Table 7.2, Stage 3 Design Briefs 10a and 10b, pg. 165).

3.9.36 Furthermore, we welcome EDF Energy's commitment to enhance the landscape, biodiversity and recreational value of the wider EDF Energy estate (**Vol 1**, para 7.4.107, pg. 192), including a specific commitment to producing a long-term Landscape and Ecology Management Plan (LEMP) which, in part, plans to return arable land within the EDF Energy estate back to 'Suffolk Sandlings' acid grassland and heathland post-construction (**Vol 1**, paras 7.4.101 – 7.4.108, pp. 191-192 and **Vol 2A**, para 2.3.18, p.25). Importantly, we welcome that the LEMP will include details on long-term management and monitoring of habitats created to ensure that they deliver the environmental enhancements required (**Vol 2A**, para 2.3.18, pg. 25).

3.9.37 In addition to the ecological benefits, such a plan would be hugely important as a landscape and visual mitigation measure. By establishing a strong landscape character which reinforces the character and lifts the landscape quality of this part of the AONB (and is commensurate with its nationally designated status) the strategy can help to indirectly mitigate those significant impacts of the scheme which cannot be directly mitigated by altering the design or location of buildings or by screening. This is also the only way in which the Sizewell project can provide for landscape net gain.

3.9.38 To ensure that the full potential of the LEMP is realised we would like to work with EDF Energy's consultants, plus the local authorities, AONB Partnership and other key local stakeholders, to review the draft LEMP to confirm that this potential will be realised. We consider that such a strategy would certainly be warranted given the limitations on how far the impact of the power station and other buildings can be mitigated.

3.9.39 We advise that the LEMP should integrate but clearly distinguish between those areas of land which have been secured through the regulatory requirements (e.g. mitigation and/or compensation areas secured through the Habitats Regulations, Wildlife and Countryside Act, 1981 etc. such as the compensation land for SSSI loss at Aldhurst Farm, marsh harrier mitigation land, reptile mitigation area near to Sizewell Gap, bat mitigation areas, landscape mitigation etc.) and those areas which are proposed as biodiversity and landscape enhancement/net gain. For example, as well as being a regulatory requirement (i.e. SSSI compensation), the work at Aldhurst Farm is also outside but immediately abutting the AONB and so should produce a landscape asset which complements the designated area itself. Whether and how that relationship could be strengthened further

in the wider net gain context might be part of a review of the estate strategy involving Natural England, the LPAs, the AONB team and other key local stakeholders.

3.9.40 We advise that such provisions should also be clearly outlined at both a spatial and temporal scale e.g. in the short-medium term (i.e. throughout construction, operation and removal of temporary works) and long-term (i.e. beyond the operational period).

Conclusion

3.9.41 **The necessary level of detail on this issue (i.e. the draft LEMP) is not presented within the consultation documents and so we cannot provide more detailed advice at this stage. However, we understand that work on this issue is currently being progressed by EDF Energy and we look forward to advising on this further once more detailed information is available.**

Impacts on public access, including the England Coast Path and wider access

3.9.42 The Marine and Coastal Access Act 2009 places a duty on the Secretary of State and Natural England to secure a long distance walking trail around the open coast of England, i.e. the England Coast Path (ECP), together with public access rights to a wider area of land along the way for people to enjoy (which we call 'spreading room').

3.9.43 Natural England is currently working on the alignment of the Aldeburgh to Hopton on Sea ECP stretch which include the section of beach which fronts Sizewell A, B and C (as proposed) and is engaged in discussions with landowners, including EDF Energy and Magnox. Further information on timescales for the adoption of the ECP is given on our website: https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-the-coast.

3.9.44 Our current proposals for this section is a route which uses the already well-used 'track' on the beach seaward of the Sizewell site as the main trail. The main trail sits within the wider coastal margin which is also subject to coastal access rights and the coastal margin comprises land both seaward and landward of the main trail. All land seaward of the main trail is part of the coastal margin and the landward edge of the landward side of the coastal margin is formed by the fences and walls associated with the seaward curtilage of the site. Landowners in this area have been sent draft proposal maps

3.9.45 Those aspects of the project proposals which are likely to affect the ECP route, such as the use of the BLF, may require access mitigation (e.g. a banksman to facilitate access, provision of an alternative temporary diversion route during ECP closure etc.). Having reviewed the consultation documents in this regard, we advise that full assessment of such impacts and mitigation has not yet been undertaken.

3.9.46 More widely, recreation and access within the Sizewell Estate is currently provided by public footpaths, including the Sandlings Walk, the Suffolk Coast Path and permissive footpaths and bridleways. As we advised at Stage 2, consideration should be given during all stages of the proposal to ensuring no net loss of public access and amenity. EDF Energy should look for opportunities to enhance access and enjoyment, especially of Suffolk Coast and Heaths AONB and Suffolk Heritage Coast, in a manner consistent with conservation of their natural beauty and the needs of agriculture, forestry and other uses.

Conclusion

3.9.47 **The necessary level of detail on these issues is not presented within the consultation documents and so we cannot provide more detailed advice at this stage. However, we understand that work on these issues is currently being progressed by EDF Energy and we look forward to advising on this and the associated impact assessment further once more detailed information is available.**

Annex 4: Natural England's detailed advice on the Stage 3 consultation documents

4.1 Overall, the consultation documents provide an overview of the technical assessment work undertaken to date and clearly state EDF Energy's preferred options for various aspects of the project proposals put forward at this stage. We advise that impacts from all aspects of the project must to be fully considered in their own right and cumulatively as a whole. The project must also be considered in combination with other plans and projects, including the other energy projects on the Suffolk coast.

4.2 We note from the consultation documents that not all of the infrastructure outlined will form part of EDF Energy's DCO application and that the nature of the final proposals will depend upon decisions made following this consultation, in particular whether a rail-led or road-led freight management strategy is to be adopted (**Vol 1**, para 1.1.6, pg. 5). The aspects of the project to be taken forward should be confirmed as soon as possible and will need to take full account of the environmental sensitivities of the local area, progressing with the least damaging options with regards to ecological and landscape impacts.

4.3 Furthermore, the potential need for further infrastructure requirements which would be progressed outside the DCO application is acknowledged in the consultation documents. For example, with regards to the staff accommodation the consultation documents state that "*if more accommodation was needed for workers EDF Energy would not expand the campus but we anticipate that local landowners would respond with proposals to create or extend one or more local caravan parks*" (**Vol 1**, para 2.1.8, pg. 15). We advise that any such proposals would themselves need to be considered in terms of the ecological and landscape constraints of the local area.

4.4 This Annex provides Natural England's detailed comments on the various options presented in the consultation documents, both for the project as a whole (**section 4.5**) and broken down into the individual elements within the MDS and AD sites (**section 4.6**).

4.5 **Natural England's comments on the project as a whole, as proposed under both the road-led and rail-led strategies (i.e. applicable to multiple elements of the project proposals within the MDS and AD sites):**

Impacts on ecology

4.5.1 ***Habitat loss and fragmentation:*** It is clear that the project as proposed would lead to both permanent and temporary loss of extent of Sizewell Marshes SSSI (the area known as the 'SSSI triangle') in a part of the site which is a mix of habitat types including lowland ditch systems, tall-herb fen, fen meadows and rush pasture which support outstanding assemblages of vascular plants, invertebrates and breeding birds. The SSSI also supports SPA bird species from nearby sites e.g. marsh harrier and wintering wildfowl. This direct SSSI loss is principally as a result of the main power station platform and SSSI crossing proposals and represents a loss of nationally important habitats supporting nationally and internationally important species

4.5.2 It would appear that the permanent land take from the SSSI has not increased since Stage 2 which is welcomed. Nevertheless, the current proposed permanent loss of the SSSI is 5.75% of the site (6.06/105.4 hectares). The conservation objectives for the site state that there should be no reduction in the total combined extent of wetland in relation to the established baseline and that there should also be no reduction in channel length.

4.5.3 As per our Stage 2 comments, in this context we reiterate at Stage 3 that '*As a general principle…the area of replacement habitat should be greater than the area of habitat affected due to the inherent risk of creating habitat of same quality, quality and distinctiveness. Habitat creation should be established in advance of habitat loss which requires early securing of suitable land for habitat creation*.'

4.5.4 The principle of compensating for the proposed loss of the SSSI reedbed ('tall-herb fen') extent has been previously established at the earlier stages of our engagement, with an area of new reedbed already created at Aldhurst Farm. However, we advise that this (and the compensation proposals for the other habitat types) needs to be fully quantified in terms of area to be lost vs. area to be created.

4.5.5 Whilst the principle of compensating for the proposed loss of the SSSI fen meadow extent has been discussed at earlier stages of our engagement, further detail on the location and nature of possible compensation sites and quantification of the area to be lost vs. area to be created etc. is yet to be confirmed. The PEI states that "*A fen meadow strategy is being developed to identify a derelict area of fen meadow in Suffolk which could be restored to compensate for the permanent loss of about 0.5ha of fen meadow habitat from within Sizewell Marshes SSSI, associated with the construction of the platform and the diversion of the Sizewell Drain*" (**Vol 2A**, para 2.3.18, pg. 24, also see para 2.3.29, pg. 26). As previously advised, Natural England considers that compensation for such habitat loss cannot be provided through restoring existing degraded fen meadow (although this could be considered in the wider enhancement/net gain context), but that it should include re-creation of fen meadow. In this regard, further detail is also required on:

- The multiplication factor/ratio for the area of any compensatory habitat to be created, given its SSSI status and the difficulty/risk involved in creating such a habitat and the extent of permanent physical separation from the SSSI;

- The timeframe for creating the compensatory habitat given that it should ideally be functional before any existing fen meadow is lost, in order that the project does not compromise the objective of 'no net loss' to the overall coherence of the SSSI network;

4.5.6 Clarification is also needed with regards to any further losses/damage to the SSSI interest features as a result of:

- The Sizewell Drain being moved and the process involved in making these changes;

- Any works needed to raise the SSSI crossing height in future: the consultation documents state that, with regards to flood risk, "*the landscaped area of the crossing could potentially be raised to provide further protection to the power station from flood risk*" and that "*this adaptation could take place with no additional loss of SSSI land*" (**Vol 1**, para 7.4.68, pg. 184). However, it seems unlikely that the height of the crossing could be raised without either further loss of the SSSI or significant reinforcement which could have further hydrological implications.

- The CDO route: Fig 7.52 of the consultation documents (**Vol** 1, pg. 229) indicates that the combined outfall route may pass through the SSSI.

4.5.7 With regards to the temporary SSSI land take, the consultation documents indicate that the extent of temporary SSSI land take has increased since Stage 2 which is very disappointing (**Vol 1**, Figures 7.28 and 7.29, pp.196-197); this is due to the need for some additional National Grid works to relocate a pylon and realign overhead lines and some works associated with the temporary construction area (**Vol 1**, paras 7.4.24 – 7.4.29, pg. 173 and paras 7.5.120 – 7.5.121, pg. 231). We advise that further clarification is required on this issue to confirm the detail of the proposals, the extent of this additional temporary land take and the impact assessment for the SSSI habitats and species which will be affected, including any necessary mitigation measures. Further detail must also be provided on the plans to restore these areas upon completion of the temporary works to ensure that temporary SSSI land take does not become permanent.

4.5.8 As previously noted, permanent loss of non-notified habitats (in designated sites terms) could also affect species which are reliant on them for the ecological function they provide and this will need to be fully assessed for the necessary species within the ES.

4.5.9 One example of this is the loss of Sizewell Marshes SSSI extent and current arable land within the MDS which represents a loss of foraging resource available to marsh harriers from Minsmere. In this case we welcome the principle of providing alternative foraging habitat as mitigation, designed to support large populations of prey species across the northern part of the EDF Energy estate in advance of construction (**Vol 2A**, para 2.3.28, pg. 26). We advise that this approach should also be considered, where necessary, for other species including those which are notified features of designated sites (e.g. wider SPA bird species).

4.5.10 Another example is that, although not a notified feature of Sizewell Marshes SSSI itself (as acknowledged within the consultation documents (**Vol 1**, para 7.4.64, pg. 184)), the wet woodland which will be lost is both a NERC Act section 41 priority habitat and an important habitat for the invertebrate assemblage for which the SSSI is notified; mitigation/compensation for this loss will therefore need to be considered. We are not aware that this loss is reflected in the Aldhurst Farm scheme as appears to be suggested within the consultation documents (**Vol 1**, para 7.4.113, pg. 195); part of the existing SSSI interest is the braided nature of the ditches and open sediment where it passes through the alder woodland which could be impacted by the proposals, including the re-routing of the Sizewell Drain. The PEI recognises that "*There will be a small residual loss of wet woodland and associated species from Sizewell Marshes SSSI. This residual impact would be potentially significant at local level but compensated through the overall net gain in biodiversity from the long-term proposals to restore the arable land within the EDF Energy Estate to Sandlings heath and acid grassland*" (**Vol 2A**, para 2.3.41, pg. 29). However, we advise that it is not appropriate to mitigate for impacts to nationally important SSSI species (i.e. the invertebrate assemblage) by creating unrelated habitats elsewhere which would not support the relevant features. Furthermore, access on soft ground to install sheet piling could potentially damage the rush pastures and affect the management of the remaining rush meadow between the ditch and sheet piling. Again, this requires further consideration within the full ES.

4.5.11 As previously advised with regards to European sites (see para 3.9.9 above), any risk of a reduction in or loss of a terrestrial or marine European site should be judged to be a LSE, and the full significance of its impact on a site's integrity should be further tested by AA. We advise that sufficient detail on this must be provided within the full ES, clearly identifying whether or not the proposed development would affect the Conservation Objectives of the designated features, to complete AA.

4.5.12 The BLF jetty, dredge area, FRR, CDO, CWI intakes and outfalls, thermal and chemical plumes may result in a direct/indirect loss of habitat from the Southern North Sea SAC and the Outer Thames Estuary SPA which must be assessed in detail within the full ES.

4.5.13 In addition, the coastal zone in this area is likely to change considerably in the future, either with or without the proposed power station. Any potential effects of the Sizewell C development on the geomorphology and hydrodynamic processes which shape the alignment of the coast, need to be thoroughly and properly understood and assessed. As stated in the consultation documents (**Vol 2A**, para 2.3.32, pg. 27), any impact assessment on this should be set out against the potential for habitats and species to be lost to natural processes at some point in the future

4.5.14 It is unclear as to whether coastal change driven by the current MDS proposals would result in the loss of coastal habitat from the Minsmere to Walberswick Heath and Marshes SAC (*Annual vegetation of drift lines* and *perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves*) which would represent an AEOI. This must be assessed in detail within the full ES. Furthermore, this coastal change also needs to

be considered in terms of impacts on the wider mosaic of internationally and nationally important habitats in the Minsmere Valley, and the species they support which are afforded protection under the SPA, Ramsar site and SSSI designations.

4.5.15 The loss of any sandbank habitat within the Outer Thames Estuary SPA could result in effects on red-throated divers which may rely on this habitat for feeding, which could potentially represent an AEOI. Sandbanks are dynamic systems and are therefore constantly changing, however their associated communities are vulnerable to activities and development. Any disturbance which interferes with the hydrological regime in the vicinity of sandbanks can be detrimental as maintenance of this habitat is dependent on current direction and speed. Adjacent coastal development and construction of sea defences can potentially change hydrological regimes.

4.5.16 Seasonally high abundance of benthic taxa following recruitment events on the Sizewell-Dunwich Bank suggests the sandbank may provide feeding grounds for higher trophic levels (fish, seals, seabirds). Any potential impacts should therefore be assessed against designated features and the prey species on which they depend. We note that sand eels have not been included within PEI among the 'Key fishes of Greater Sizewell Bay' (**Vol 2A**, Table 2.16.1, pg. 137). Sand eels are of ecological and conservation importance as they provide a food source to bird species which are a feature of the SPA and porpoise which are a feature of the Southern North Sea SAC. As we previously advised at Stage 2, potential impacts on this species must be considered in the final ES and HRA. The potential food web effects from entrainment and impingement on designated features should also be clearly stated in the ES.

4.5.17 An area of shingle habitat (Suffolk Shingle Beaches CWS of SSSI quality) will be directly lost to the footprint of the proposed development and that in front of the CDF will be squeezed and eventually lost. The current coastal frontage is of nationally high value for its vegetation communities and invertebrates. We would therefore like to see a consideration of this and any potential net gain or enhancement that could be offered to mitigate for this loss. We advise that the aim of the design for the new coastal defences should be to keep the loss of existing habitat to a minimum and to re-create shingle and dune habitats which are equivalent or better in wildlife interest and value, than those to be lost. Lessons learned from Sizewell B restoration should be taken into account. The sCDF/sacrificial bund provides an opportunity during the construction phase to trial habitat creation techniques ahead of the operational phase. We advise that opportunities for natural colonisation and succession should be built into the final design to maximise the biodiversity value of these important plant communities.

4.5.18 The PEI recognises that Sizewell Marshes SSSI supports water voles, otters and badgers (**Vol 2A**, para 2.3.12, pg. 23). However, none of the survey data in relation to these species have been provided within the PEI and we are therefore unable to provide any specific comments regarding these species. Further detail is also required as to whether the connectivity between Sizewell Marshes SSSI and Aldhurst Farm is adequate in terms of movement of species (e.g. is the drain beneath Lover's Lane suitable for the movement of species?).

4.5.19 The most well-used commuting routes/flight-paths for bats have been named within the PEI (**Vol 2A**, para 2.3.16, pp. 23-24). However as previously advised, Natural England require key foraging and commuting routes for all bat species to be identified across the site (included north – south commuting routes), with flight lines illustrated on a habitat map, to demonstrate how ecological connectivity may be affected by the proposed development.

4.5.20 It is written in the PEI that the majority of the woodland resource within the EDF Energy estate would be retained (**Vol 2A**, para 2.3.18, pg. 24). However, as previously advised, Natural England has concerns regarding the potential bat population fragmentation should the loss of the conifer plantation habitat at Goose Hill result in the severance of commuting

routes and reduction in foraging areas. We therefore advise that the impact of the loss of the plantation needs to be considered further. There does not appear to be any mention of post-development tree planting to compensate for the loss of the conifer plantation at Goose Hill. It is acknowledged that the rides provide foraging habitat for bats (**Vol 2A**, para 2.3.6, pg. 22) and Natural England is concerned that these may also provide key commuting routes from north to south across the site. As previously advised, replacement planting for the loss of woodland habitat, before and after the completion of works, is required.

4.5.21 We note from the illustrative MDS changes shown within the consultation documents that reference is made to additional woodland at Goose Hill being retained (**Vol 1**, Figure 7.2 and Table 7.1, pp. 159-160). However, it should be noted that this does not represent an increase in retained woodland; the area of woodland identified, which now sits within the site boundary, was previously outside the boundary (as per Figure 7.1 in the Stage 2 consultation), and therefore was not going to be lost. If fact it appears that there will be an increase in loss to the north of Goose Hill for additional land for the water management zones.

4.5.22 Whilst the consultation documents state that the majority of tree loss within these areas will occur within the less-valuable (to bats) plantation within Goose Hill (**Vol 2A**, para 2.3.34), we advise that whilst Goose Hill may not offer so much in the way of roost resource, it is still likely valuable commuting foraging area. With regards to requirements for additional connectivity or roost provision for bats, we advise that maintaining connectivity is key here to avoid breaking flight lines.

4.5.23 The PEI acknowledges that "*The deciduous woodlands, in particular Ash Wood and Fiscal Policy, contain mature and semi-mature trees suitable for roosting bats and nesting birds. The conifer plantations of Goose Hill and Kenton Hills are of more limited ecological value, but the rides and glades support reptile populations and habitat for invertebrate species, as well as providing foraging habitat for bats*" (**Vol 2A**, para 2.3.6, pg. 22). We advise that this also likely includes commuting routes which cannot be ignored and should therefore be assessed within the full ES.

4.5.24 With regards to the areas which are described as being the most well-used commuting routes/flight-paths for bats (**Vol 2A**, para 2.3.16, pp. 23-24), we note that these are primarily around or outside the boundary of the main development site and not passing north to south across it; we understand that commuting routes within Dunwich Forest and Goose Hill and foraging routes within Dunwich forest were not found to be well used and we look forward to reviewing this survey data once they are made available to confirm this.

4.5.25 In general, there appears to be very little detail on post development planting. Without this we are concerned that there will be permanent loss of foraging and commuting routes and we have seen nothing to date to demonstrate that there will be any significant improved foraging for bats.

4.5.26 Impacts to and fragmentation of species populations (principally bats and great crested newts (GCN)) arising from the MDS and AD site works (particularly the new roads) will need to be fully assessed within the full ES. Without further survey information, Natural England is unable to comment on the cumulative effect of the development on protected species at this stage.

4.5.27 Consideration should be given to section 40 of the NERC Act 2006 to avoid, where possible, or mitigate impacts to species and/or Habitats Of Conservation Importance (HOCI). There is no detailed information on the exact location of marine HOCI discussed within the PEI and so Natural England cannot make detailed comments. However, we would expect any NERC habitats in the offshore area to be identified within the full ES. Consideration should also be given to potential impacts on terrestrial habitats and species

of importance outside of designated site interests, including those listed under section 41 of the NERC Act as priority habitats and species. This should include an assessment of impacts during construction and operation from those elements of the project within the MDS and AD sites, against the current baseline. In this context, we welcome that the importance of the MDS for a number of these species has been acknowledged (**Vol 2A**, Chapter 2.3, pp. 22 – 36) and advise that this should extend to cover the AD sites within the full ES.

4.5.28 ***Hydrological impacts*:** Wetland habitat biodiversity, functionality and sustainability is dependent on its hydrology; not just the hydrology within, for example, protected site boundaries, but the hydrology of the catchment that the wetland is sited within. We advise that there is currently an apparent lack of consideration of the influence of the catchment hydrology and surrounding substrate on these protected wetlands (i.e. Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI).

4.5.29 Based on the evidence provided to date, the impacts from the combination of works within and around Sizewell Marshes indicates a significant threat to SSSI condition status in the medium if not short term. Indeed, the PEI indicates that significant impacts on the hydrological functionality of Sizewell Marshes will continue into the operational phase, with subsequent hydro-ecological impacts on the receiving Minsmere South Levels (**Vol 2A**, Table 2.11.2, pg. 100).

4.5.30 Overall, we welcome that EDF Energy has recognised within the consultation documents that the cumulative impacts of the project (including the main power station platform, SSSI crossing, drain realignment, electricity supply cable route, MDS elements north of the SSSI etc.) on the hydrology of Sizewell Marshes remain 'potentially significant'. However, we advise that hydrological impacts to Minsmere-Walberswick Heaths and Marshes should also remain 'potentially significant' due to the hydrological connectivity of the wetlands and the importance of maintaining the functionality of the hydro-ecological corridor between Sizewell Marshes and Minsmere South Levels.

4.5.31 Also of concern is the impact of any construction works on Sizewell Marshes due to the surrounding substrate. As stated in the PEI, "*The majority of the site comprises deep well drained sandy soils belonging to the Newport Soil Association"* (**Vol 2A**, para 2.6.3, pg. 60). According to the LandIS website this substrate is classed as vulnerable to leaching and highly erodible, raising significant concerns regarding the potential for reductions in protected site water quality and clarity due to increased sediment loads, supported by the statement in the consultation documents that "*Works including topsoil stripping, site levelling, excavations, sub-soil disturbance for road access, installation of fencing and vegetation clearance would take place across the main development site during the early phases of construction"* (**Vol 2A**, para 2.5.58, pg. 53). According to the PEI, *"The establishment of perimeter drainage and implementation of the construction phase drainage system would minimise off-site effects. These systems would account for potential hydrological and water quality risks through a combination of SuDS features and engineered structures"* (**Vol 2A**, para 2.11.38, pg. 97). However, we advise that more detailed information is required on:

- How Sizewell Marshes hydrological integrity / flows will be maintained during the proposed supply cable installation;
- The capacity of the proposed Sustainable Drainage System (SuDS) e.g. sediment trapping, water management zones, to mitigate against the highly erodible and leachable nature of the substrate surrounding Sizewell Marshes SSSI given the lack of buffer zone between site development and the SSSI;

4.5.32 It is clear from the consultation documents that, with regards to hydrological/ hydrogeological/ hydro-ecological matters associated with the project as proposed, further work is required in order to assess groundwater and surface water impacts (both from individual project elements and cumulatively) and the need for any necessary mitigation/compensation (**Vol 2A**, paras 2.10.34 – 2.10.37, pg. 92). This includes groundwater modelling and hydro-ecological conceptual modelling (HCM) which is an essential pre-requisite for informed assessment of potential impacts from the project on these internationally and nationally important wetland systems. We understand that this work is currently being progressed by EDF Energy and we look forward to advising on this and the associated impact assessment once the further information is available. It is essential that this information is clearly presented and agreed with the Environment Agency, Natural England and other relevant local stakeholders before informed decisions and robust conclusions can be made. As such, until we have reviewed the outstanding assessments in relation to this we are unable to provide any further detailed advice at this stage.

4.5.33 We advise that flood risk to sensitive ecological receptors, including designated sites, still needs to be fully assessed and understood. As such, a Flood Risk Assessment (FRA) should be included within the full DCO application.

4.5.34 The consultation documents acknowledge the need for a new foul water drainage network served by a dedicated sewage treatment plan which will treat foul water before it is discharged to sea via a combined drainage outfall (**Vol 1**, para 7.5.100, pg. 228). The full DCO application/ES should include a foul water drainage strategy, both for the MDS and AD sites, which includes any measures required to mitigate impacts on designated sites.

4.5.35 However, there does not appear to be any proposal for increased abstraction to provide freshwater supply during both construction and operational stages of the project (e.g. for physical construction, water for accommodation workers etc.). Any increased abstraction must be evaluated for effects on designated sites, especially wetlands, within the full DCO application/ES.

4.5.36 Furthermore, we advise that the full DCO application/ES should include a dewatering discharge strategy which incorporates any mitigation measures necessary to mitigate ecological impacts, including to designated sites.

4.5.37 We welcome the proposals to integrate SuDS into the development proposals, including through the water management zones which have been increased in number and size since Stage 2 to ensure that they can attenuate and, if required, treat surface water run-off prior to discharge to either watercourses or to the ground (**Vol 1**, paras 7.5.102 – 7.5.103, pg. 228). It is important that these are adequately designed so that they do not overtop and take water and sediment down into the ditch/drain system of the SSSI. They should also be designed such that the hydrological functioning of any adjacent water dependant habitats are maintained, or enhanced where natural hydrological functioning has already been adversely affected. We advise that the full DCO application/ES should include a surface water drainage strategy, both for the MDS and ADS, which incorporates measures needed to avoid impacts on designated sites.

4.5.38 We welcome that in order to prevent pollution within the construction areas, features such as oil separators and filters will be used to remove hydrocarbons (**Vol 1**, para 5.4.104, pg. 229). Bearing in mind the close proximity of the proposed development to highly sensitive designated sites, we advise that full consideration of such impacts and all necessary mitigation measures must be included within the full DCO application/ES and embedded in the Construction Environmental Management Plan (CEMP). This should include a strategy for managing pollution during construction and operation, both for the MDS and AD sites project elements.

4.5.39 We advise that you take full account of the Environment Agency's advice on these issues as the lead Defra group commentator on these topic areas.

4.5.40 ***Noise disturbance:*** We note from the PEI that noise modelling and analysis has been undertaken for the project proposals within MDS in order to assess potential disturbance impacts to breeding and non breeding birds during construction, and identify the need for any mitigation measures such as acoustic screening (**Vol 2A**, para 2.3.21, pg. 25).

4.5.41 We welcome this and advise that it should cover all elements of the project with the potential to cause noise disturbance, clearly identifying all potentially sensitive noise receptors (e.g. all breeding and non breeding birds, including notified species within the designated sites themselves, notified species using functionally linked land (FLL), non-notified prey species of notified species etc.). It should also cover operational noise for which adverse effects appear to have been ruled out (**Vol 2A**, para 2.7.18, pg. 64). As we advised at Stage 2, the potential for noise being generated at height, such as when working at height and from cranes which cannot be mitigated by acoustic screens should be included in the assessment in terms of the potential to disturb birds and other designated features.

4.5.42 We note that the 'significance' noise threshold used for marsh harrier within the PEI has been based on a threshold for impulsive noise and disturbance of wintering waterbirds which has been agreed with Natural England (**Vol 2A**, para 2.3.27, pg. 26). This is considered appropriate if used as a proxy for potential marsh harrier disturbance (i.e. for a predatory bird foraging in flight away from a nest). However, as we have advised previously on the issue of wider acoustic effects (i.e. noise preventing harriers from hearing the rustling of a field vole), this might provide a lower threshold for significance. In addition, a threshold used for wintering birds / marsh harrier is not the same threshold as that which should be used for assessing impacts on breeding birds. Typically, the published literature on breeding birds and noise details different types of behavioural response (e.g. effects on productivity, reduced nesting density, interference with communication / bird song) in relation to average noise levels, rather than just flushing of winter flocks in relation to sudden loud bangs. Noise mapping the average 50 to 60 dB(A) contour might therefore be more appropriate in this instance, based on an appropriate threshold.

4.5.43 We are yet to see the full bird survey data and noise modelling and so cannot provide any detailed advice at this stage. However, it is important that we are able to review this information as soon as possible in order to consider potential impacts on the full range of bird species for which the relevant designated sites are in part notified.

4.5.44 As discussed above, a construction noise 'significance' threshold of 70 dB has been identified within the PEI as the point at which potentially adverse disturbance effects to wintering birds / marsh harrier could arise (**Vol 2A**, para 2.3.21, pg. 25). We request clarification as to whether any similar threshold has been considered for other species, most notably bats. It is noted that an ongoing assessment is investigating the extent to which construction noise might dissuade bats from foraging or roosting close to (or within) the main development site (**Vol 2A**, para 2.3.33, pg. 27). This action is welcomed and in keeping with our previous advice. It is concluded within the consultation documents that disturbance of bat species from operational noise is also unlikely to be significant (**Vol 2A**, para 2.3.36, pg. 27). However, further information to demonstrate how this has been determined is required.

4.5.45 Whilst terrestrial noise and receptors are considered to an extent within the PEI, Natural England advises that similar consideration should be given to marine noise and sensitive receptors. Construction noise including dredging, shipping, piling and sCDF nourishment works in air and underwater, should be assessed with regard to sensitive features such as marine mammals, fish and birds using the area. The number of piles, their size and the maximum piling energy should be presented, the potential disturbance, injury and

mortality effects on sensitive species should be estimated. The impacts of noise should to be assessed both alone and cumulatively, and in-combination with other projects and activities taking place in the area.

4.5.46 Insufficient information on the potential impacts to marine mammals has been provided within the PEI and as a result Natural England is unable to provide any substantive advice on this at this stage. We would expect to see this species considered within the full ES, shadow HRA and RIAA as appropriate.

4.5.47 There is also insufficient information provided in the PEI on potential effects on red-throated diver and tern species. The Outer Thames Estuary SPA is classified for the protection of the Annex I species red-throated diver (*Gavia stellata*) common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*). The PEI summarises disturbance to red-throated diver and other bird species from shipping traffic associated with the BLF where the mitigation is outlined as the same as for Minsmere to Walberswick SPA. (**Vol 2A**, Tables 2.3.1 and 2.3.2, pp. 30-36). However, as the construction and operation is within the Outer Thames Estuary SPA, detailed consideration should be given to potential noise, and disturbance effects on features of the site. In particular during construction piling noise and disturbance should be assessed. Red-throated divers and terns of the Outer Thames Estuary SPA are sensitive to disturbance by noise and visual presence, which can lead to displacement from feeding grounds. Noise and visual disturbance associated with construction, operation and decommissioning activities could therefore result in AEOI. Consideration should be given to the most sensitive periods for designated species and the timing of works.

4.5.48 ***Light disturbance*:** We welcome that the development proposals seek to minimise disruption to bats and other species from lighting during construction (**Vol 1**, para 7.5.106, pg. 229) and support the proposal to include a construction and operational lighting strategy within the DCO application documents/ES (**Vol 2A**, para 2.2.24, pg. 15). As we have previously advised at Stage 2, the power station platform, the common user facilities and the contractors' compound areas would be lit at all times up to 200 lux (for comparison, bright moonlight is about 1 lux). These locations are adjacent to Sizewell Marshes SSSI and are also in close proximity to Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI. An assessment of the ecological impact of any light-spill into the surrounding designated habitats and the effect on mobile species, such as nocturnal birds and bats, is therefore required.

4.5.49 It is concluded within the PEI that disturbance of bat species from operational lighting is unlikely to be significant (**Vol 2A**, para 2.3.36, pg. 27). However further information to demonstrate how this has been determined will be required.

4.5.50 The consultation documents detail that the "*ecological buffer areas around the majority of the site would not be lit*" (**Vol 1**, para 7.5.110, pg. 230). It is unclear from this statement whether the majority of the buffer will not be lit or the buffer is around the majority of the site. We therefore seek further clarification on this. Other than this, there appears to be very little detail on post development planting which will need to be addressed within the full ES.

4.5.51 We are unable to provide further detailed comment on this until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

4.5.52 ***Air quality***: Bearing in mind the close proximity of the proposed development to highly sensitive designated sites, we advise that consideration of potential impacts from particulate (dust) emissions during construction and operation, and the need for any necessary mitigation measures (e.g. dust suppression techniques etc.), must be included within the full ES and embedded within the CEMP.

4.5.53 Within the MDS, we note that there is potential for air quality impacts to designated sites arising from the backup diesel generator which could lead to significant nitrogen deposition which could affect sensitive site features and welcome that this will be fully assessed within the detailed air quality assessment (**Vol 2A**, para 2.3.38, pg. 27).

4.5.54 In addition, we advise that potential impacts from increased road traffic during construction and operation (from MDS and AD site elements) should also form part of the air quality impacts assessment, in particular to sensitive designated sites; road traffic is a source of NOx emissions, meaning that increases in traffic can represent a risk to designated site features in terms of potential effects associated with exceedance of critical levels (CLe) for sensitive vegetation. Traffic emissions can also be a short range contributor to nitrogen deposition.

4.5.55 ***Unintentional introduction or spread of invasive, non-native species (INNS)***: as we have previously advised, the proposals present a risk of unintentionally spreading INNS to the area which could have a detrimental effect on sensitive ecological receptors, including designated sites. We therefore welcome the commitment from EDF Energy to include biosecurity controls for this within the full ES/CEMP (**Vol 2A**, para 2.3.18, pg. 25).

4.5.56 ***Physical interaction between species and project infrastructure***: we advise that there are a number of elements of the project proposals which present the possibility for physical interaction (e.g. collision) with notified species (e.g. vessel activity, capital dredging, piling and drilling within the Southern North Sea SAC during the construction phase, pylons and associated overground cables (a new project element since Stage 2) with bird species etc.). Assessment of the potential impacts from this must therefore be included within the full ES.

4.5.57 ***Summary***: The necessary level of detail on many of these impact pathways is not presented within the PEI and so we are unable to provide detailed advice on these issues at this stage. However, we understand that work on these issues is currently being progressed by EDF Energy and we look forward to advising on them and the associated impact assessments in due course. Once all impacts have been fully assessed and the necessary avoidance, mitigation and compensation measures confirmed and agreed, we advise that the CEMP (as referred to in **Vol 2A**, para 1.5.7, pg. 9) should pull this information together in one place in order to provide clarity and confidence in their efficacy.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.5.58 In our response to the Stage 2 consultation we recognised that "*this very extensive development site will be changed by surface stripping, deep excavations for borrow pits and foundations, soil storage, construction compounds and the construction of permanent and temporary structures*". The current consultation confirms this and adds some detail to the nature and extent of those changes and alteration to the plans for the site. We note the mitigation measures described in the PEI, including those areas of woodland which will be retained to provide some site screening, reinforced by some additional planting, and the use of landscaping to provide further localised screening (**Vol 2A***,* para 2.2.22, pg. 14).

4.5.59 We note the new proposal at this stage for additional water management zones and the on-site requirement for haul roads and service roads. The PEI references lighting and we accept that providing safe working conditions is paramount. Nonetheless, we will expect the lighting strategy in the full ES to demonstrate how light pollution and its effect on the AONB can be minimised. We also note the proposals for noise attenuation bunds but cannot attest to the effectiveness of these. The noise mapping provided in the PEI is useful but as explained earlier those seeking to enjoy the AONB will be highly sensitive to construction noise.

4.5.60 A major landscape mitigation measure is to complete the construction as quickly as possible and to begin to establish other screening mitigation, high quality reinstatement and landscape enhancements quickly as well.

4.5.61 With this in mind, the ES should consider which of the road or rail-led strategy options would best facilitate this, noting that the rail link would be removed post-construction.

Wider landscapes

4.5.62 For those aspects of the proposals that fall outside of the AONB or its setting, we advise that the local planning authority's advice on landscape and visual impacts should be sought

Impacts on public access

England Coast Path and wider access

4.5.63 See our comments under paragraphs 3.9.42 – 3.9.47 above for our general advice on this issue

4.6 **Natural England's comments on the individual elements of the project as proposed under both the road-led and rail-led strategies:**

4.6.1 **Main power station platform proposals, with associated infrastructure including electrical connections (overground)**

Impacts on ecology

4.6.1.1 As you will be aware, the proposed main power station platform area footprint is within and immediately adjacent to Sizewell Marshes SSSI and is also very close to Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI. See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

4.6.1.2 ***Loss of Sizewell Marshes SSSI extent (area):*** It is clear that main power station platform as currently outlined would lead to the direct loss of extent of Sizewell Marshes SSSI. EDF Energy proposes to compensate for this loss through off-site habitat creation. See paragraphs 4.5.1 – 4.5.10 above for our detailed advice on this.

4.6.1.3 ***Hydrological impacts to Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI:*** As we have previously advised, the hydrological integrity of Sizewell Marshes will also likely be disrupted by land take for the main platform. Whilst it may be possible to compensate for the direct SSSI loss through the proposed habitat creation, it is clear that this would not compensate for any loss of wetland hydrological and habitat integrity of Sizewell Marshes SSSI or the adjacent Minsmere-Walberswick system.

4.6.1.4 These considerations are in addition to potential changes to groundwater movement and surface water flow resulting from the insertion of sheet piling, the cut-off wall and de-watering operations; such impacts need to be satisfactorily determined before the impacts on ecology within Sizewell Marshes and Minsmere-Walberswick Heaths and Marshes can be properly evaluated. The impacts at all key stages of the construction and operation need to be assessed and mitigation and monitoring provided. The modelling needs to be sensitive enough to allow hydro-ecological effects on sensitive wetland habitats to be determined.

4.6.1.5 According to the consultation documents "*The establishment of perimeter drainage and implementation of the construction phase drainage system would minimise off-site effects"* (**Vol 2A**, para 2.11.38, pg. 97). However, we have concerns as to how effective this system will be due to the MDS boundary abutting the SSSI boundary, providing no buffering mitigation which is an essential consideration for a SSSI which is dependent on the surrounding hydrology. Consideration of the impacts of the project on the hydrology of the wetland need to be taken into account from a catchment perspective, not just within the SSSI boundary.

4.6.1.6 The PEI also states that "*A mitigating solution (e.g. sheet piling) would be installed to provide separation from the main development site platform and Sizewell Marshes SSSI to limit the disturbance to the hydrology and geology of Sizewell Marshes SSSI"* (**Vol 2A**, para 2.3.18, pg. 24) and that *"Initial modelling indicates that a control structure on the realigned Sizewell Drain would maintain correct hydrological regime, so effects are insignificant*" (**Vol 2A**, Table 2.3.1, pg. 32). However, it is also stated that "*The construction of the platform and cut-off wall would disrupt patterns of groundwater flow and this could in turn alter surface water levels. Once established, the cut-off wall would reduce, but not totally eliminate, drawdown arising from dewatering. Should the cut-off wall be breached later for engineering purposes, the proposed method for breaching and the recovery of water levels would require careful management. Potential effects are significant"* (**Vol 2A**, para 2.11.37, pg. 97). We consider that there is insufficient information provided at this stage for us to offer detailed advice on potential hydrological and hydro-ecological impacts until, as proposed by EDF Energy:

- *"Further surface water and groundwater numerical modelling and assessment will be undertaken to help inform the design of appropriate mitigation measures, including control structures, to maintain the SSSI water levels*" (**Vol 2A**, para 2.11.51, pg. 98)

- *"A full surface water assessment of the proposals has been undertaken and presented"* (**Vol 2A**, para 2.11.52, pg. 98)

4.6.1.7 We currently have concerns about statements made in the consultation documents about the potential need to breach the cut-off wall (**Vol 2A**, paras 2.10.31 and 2.10.33, pg. 91). Should this option be considered, full consultation with Natural England and the Environment Agency will be required with detailed consideration and explanation of the reasons why the action may be necessary, modelling of the likely impacts and outcomes of the hydrology of Sizewell Marshes and other elements of the hydrological system and consequent assessment of the impacts (positive and/or negative) on the protected features.

4.6.1.8 Based on the information presented at this stage, it is our opinion that there is insufficient technical detail presented at this stage to reach a conclusion as to whether or not hydrological and hydro-ecological changes arising from the main platform construction would lead to adverse effects on Sizewell Marshes and/or Minsmere-Walberswick Heaths and Marshes. In general, we therefore agree with EDF Energy's conclusion at this stage that there may be potentially significant effects to designated sites from the MDS proposals, including the main platform element (**Vol 2A**, Tables 2.11.1 and 2.11.2, pp. 99-100). However, we note that the tables at the end of the flood risk chapter of the PEI (**Vol 2A**, Tables 2.12.7 and 2.12.8, pp. 114-117) indicate that affects are likely to be 'negligible', whilst Tables 2.3.1 and 2.3.2 (**Vol 2A**, pp. 30-36) appear to indicate that effects on the hydrological regime will not be significant. We advise that such effects are potentially significant for the reasons set out above and that these tables need amending accordingly.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.1.9 ***Turbine halls:*** These are of course extremely prominent parts of the power station. Prior to the Stage 2 consultation the local planning authorities and Natural England were disappointed that initial assurances that the turbine halls could have a bespoke design were replaced by a proposal to replicate the design used for Hinkley C, albeit we could select the colour finish from a limited palette. The consultation documents now promise to deliver a design for Sizewell C which is "*elegant and somewhat graceful in appearance*" (**Vol 1**, para 7.4.12, pg. 170) and which, whilst still utilising the Hinkley C model, seeks to respond to the specific needs of its protected landscape setting. This includes measures to prevent light spill and we welcome this commitment. We do not currently have a settled view on which (if either) of the two colour finishes proposed should be used and would wish to discuss this with the local authorities and the AONB Partnership.

4.6.1.10 ***Operational Service Centre (OSC) and Interim spent fuel store:*** We welcome proposed improvements to the OSC, located between the turbine halls, which should improve its appearance (**Vol 1***,* paras 7.4.17 to 7.4.20). We note the need for a larger than originally anticipated spent fuel store but that this would provide for a simpler built form (**Vol 1***,* para 7.4.21, pg. 172). That there is no longer the need for a 55 metre chimney stack is welcome, together with the prospect of being able to clad the exterior to further improve its appearance.

4.6.1.11 ***Electrical connection to National Grid substation:*** We are disappointed with the conclusion that this connection cannot use an underground cable and that an overhead connection is now required (**Vol 1***,* para 7.4.27, pg. 173). We note the technical and safety reasons for this and certainly would not want undergrounding to present additional risks the SSSI. However, the additional pylons will add considerably to the visual complexity and 'clutter' of the power station both in close views and how it appears in more distant views. We can expect that welcome improvements to the appearance of the main power station buildings will, at least to some extent, be offset by the visual clutter of the overhead connection.

4.6.1.12 ***Use of cranes during construction***: As acknowledged in the consultation documents, "*During the construction of the power station buildings, the platform area would be characterised by tall cranes rising above the building structures*" (**Vol 1**, para 7.5.31, pg. 212). As we advised at Stage 2, we understand that these cranes may typically be 100 – 120 metres high; the heights of these structures, when considered cumulatively with other tall structures such as the soil stockpiles (35 metres in height at peak construction) and power station pylons etc., will be significant 'detractors' in the local landscape. Cranes are a clear signature of major construction activities within the AONB and will visually communicate this across a wide area. We therefore reiterate that the visual impact of the long construction phase must be fully assessed through the LVIA and mitigation provided where possible.

4.6.2 **Sizewell Marshes SSSI crossing and realignment of the Sizewell Drain**

Impacts on ecology

4.6.2.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

4.6.2.2 It should be noted that Figure 7.5 of **Vol 1** (p.167) refers to the Sizewell Marshes SSSI crossing within the key but does not actually illustrate its location within the

figure. Furthermore, Figure 7.19 (**Vol 1**, pg. 183) being illustrative shows the channel in the wrong place and provides no clear indication of the habitats present. It also appears to show an additional channel heading seaward and omits the cut off channel from the old Sizewell drain.

4.6.2.3 With regards to the design of the SSSI crossing, which is proposed to provide access from the main contractor compound and shared facilities area to the main power station platform, we note that the causeway over a culvert option (Option 1 as outlined at Stage 2) has been taken forward into Stage 3. EDF Energy states that they are progressing with this design option as they consider that it best responds to programme and environmental considerations (**Vol 1**, Table 7.3, p.168).

4.6.2.4 With regards to programme considerations, we note that this option brings construction, cost and adaptability benefits to EDF Energy and that a bridge design would increase construction time by six months. Subsequently, the construction of the SSSI crossing in the early stages of site development is considered by EDF Energy to be a project 'high priority' as it holds up later project development stages, and is seasonally restricted to the drier summer months.

4.6.2.5 However, in terms of environmental considerations you will be aware that Natural England's preferred option as presented at Stage 2 was Option 3 (Three span bridges). This was on the basis that this design option would likely cause the least damage to Sizewell Marshes SSSI and allow the most connectivity between the wetland habitats of Sizewell Marshes SSSI and Minsmere–Walberswick Heaths and Marshes SSSI and their hydrological systems during the construction and operational phases of the build i.e. in the short and long term. As we have previously advised, the required land-take from the SSSI, the proposal for future management of water levels and the need for a crossing all present challenges and risks for the survival and quality of the SSSIs as a result of the project. Maintaining a visibly healthy and thriving wetland is important ecologically as well as to the landscape character and quality of this part of the AONB.

4.6.2.6 Consequently, the SSSI crossing option which best protects the habitats will also provide the best outcome for the landscape. It is therefore very disappointing that Option 3, as our preferred option at Stage 2, has not been taken forward and we maintain that this option represents the best option for minimising impacts on the internationally and nationally important wildlife and landscapes.

4.6.2.7 We do not consider that the PEI provided at this stage contains a sufficiently detailed comparison of options in terms of environmental pros and cons to be able to conclude otherwise. However, we have provided some further advice on this below and would be keen to review the evidence in support of EDF Energy's preferred option at the earliest opportunity.

Designated sites

4.6.2.8 ***Loss of Sizewell Marshes SSSI extent (area):*** Our preferred option at Stage 2 (Option 3 – Three span bridsges) represented the lowest permanent land-take from Sizewell Marshes SSSI of all the options, with the removal of the temporary bridge following construction further reducing the permanent land take. This is recognised in the consultation documents which state that "*The bridge options require the least SSSI land whilst the causeway options require the most*" (**Vol 1**, para 7.4.60, pg. 182); progressing with a design option which goes against this principle is contradictory the protection afforded to SSSIs in England under the Wildlife and Countryside Act 1981 (as amended) to minimise damage the special interest of the site and to the EDF Energy's own Biodiversity Stage 3 Design Principles (Design Brief 10d) as set out in the consultation documents which is to

"*Minimise land take from the SSSI*" (**Vol 1***,* Table 7.2, pg. 165, para 7.4.112, pg. 195 and para 7.5.4, pg. 200). We advise that the issue of permanent land take from the SSSI, which includes a number of habitats and species, remains a key consideration which has not yet been fully considered. Please refer to our advice on this above under paragraphs 4.5.1 – 4.5.10 above with regards to loss of SSSI extent from the project as a whole.

4.6.2.9 We note from the PEI that "*on completion of the construction phase, the temporary haul road surface would be removed, however the embankment would remain*" (**Vol 2A**, para 2.12.76, pg. 108). It is less clear, however, whether the intention is for the embankment to remain or to be removed following at the end of the operational phase of the power station. We would therefore welcome clarification on this point.

4.6.2.10 ***Hydrological impacts to Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI*****:** We advise that maintaining hydro-ecological integrity and connectivity is fundamental to the functioning of these wetland sites and should not be compromised. We currently have concerns regarding the culvert's ability to maintain hydrological and hydro-ecological connectivity between Sizewell Marshes and Minsmere South Levels. Compared to a bridge design, the causeway/culvert design appears to form a barrier to natural surface water flow (which is not confined to the drains) through Sizewell Marsh towards Minsmere South Levels, subsequently increasing habitat fragmentation. It also creates a hydrological bottleneck at the culvert, exacerbated by the re-routing of Sizewell drain across Sizewell Marshes to the Leiston drain north of the culvert. These combined site development impacts on Sizewell Marshes reduces surface water flows to Minsmere South Levels from two drains and diffuse surface flows through the wetland, to one pinch point with increased potential for raised water levels, flows and water quality / sedimentation impacts. Any impacts on the functionality of the hydro-ecological corridor between Sizewell Marshes and Minsmere South Levels cannot be mitigated or compensated for / addressed by a habitat creation scheme.

4.6.2.11 As advised at Stage 2, we also have concerns for potential impacts to designated features of Sizewell Marshes and Minsmere-Walberswick Heaths and Marshes as a result of extended duration of flooding; we advise that the culvert design could result in more extensive damage to the habitats and longer recovery time compared to a bridge design for the crossing. Whilst there is information in the consultation documents about flood risk in association with the power station itself (**Vol 1**, para 7.4.68, pg. 184), we are more concerned about the way the causeway option will influence flood / surface water behaviour at the south end of Minsmere – Walberswick and also Sizewell Marshes. This is a narrow point where the two systems meet, with Sizewell Marshes draining into the Minsmere-Walberswick system. Our concerns are in relation to what would happen when water levels are high and/or during a storm surge; it is not currently clear as to whether the culvert, as proposed, would have capacity in those conditions or whether under such conditions it would cause (additional?) backing up of the Sizewell Marshes system. It is indicated in the consultation documents that a smaller culvert/blockage could cause backing up of the Sizewell Marshes system (**Vol 2A**, para 2.12.110, pg. 112).

4.6.2.12 If the crossing is required to function as a sea defence at some time in the future, then the likelihood of adaptation being required over the lifetime of the power station and the consequences for the designated sites of Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SAC, SPA, Ramsar site and SSSI from the various design options should be fully assessed. At present it is not clear whether adaptation has been accounted for in the FRA, for example. The method by which a bridge vs a causeway/culvert would be adapted should be

given for comparison. We note that the FRA will be presented with the application for development consent and that a full surface water assessment of the proposals will be undertaken and presented in the ES (**Vol 2A**, para 2.11.52, pg. 98) which we would welcome.

4.6.2.13 There is some limited mention of surface water modelling in relation to the culvert proposals within the PEI which states that "*The lower part of the Leiston Drain catchment is affected by fluvial flooding due to tide locking at Minsmere Sluice and overtopping of the Minsmere New Cut embankments. During large fluvial events, excess water from the Minsmere River causes backflow in Leiston Drain, such that flood levels in the Sizewell Belts are similar to those in Minsmere levels*" (**Vol 2A**, para 2.12.19, pg. 103) and that "*The culvert would accommodate more than the fluvial 1 in 100 annual probability plus climate change flows without a significant throttling effect. It is anticipated that modelling for the final FRA will confirm this*" (**Vol 2A**, para 2.12.47, pg. 106).

4.6.2.14 It is stated in the PEI that Sizewell Marshes drains under gravity to the Leiston Drain and is therefore controlled by in-channel water levels (**Vol 2A**, para 2.11.12, pg. 95). In managed wetland systems, drains often have a limited zone of influence. There will be surface water flow outwith the drainage system, as well as lateral flow through the soil profile, particularly as surface water is strongly influenced by the water levels and flows within the groundwater system as stated in the consultation documents (**Vol 2A**, para 2.11.6, pg. 95).

4.6.2.15 The realignment of the Sizewell Drain and connection with Leiston Drain appears to exacerbate the potential impacts of the proposals on the hydrological and hydro ecological functioning of Sizewell Marshes, and connectivity between Sizewell Marshes and Minsmere South Levels. As with the causeway/culvert design for the SSSI crossing, the realignment of Sizewell drain to a northerly direction appears to cut across the natural hydrological flows of the marsh (approximately East to West), further reducing hydrological functionality and connectivity between the two wetlands. Construction / re-routing of the drain could disrupt the hydrological integrity of the peat substrate. Intact hydroscopic peat allows for lateral movement of water through the substrate profile i.e. hydrological flows are not constrained to the drains. Drying out of peat makes the substrate hydrophobic, leading to substrate degradation and instability of the water table, both of which would have negative impacts on the hydro ecological integrity of the wetland. For example, rising water levels / prolonged inundation will alter the character of the vegetation and potentially increase vigorous competitive species at the expense of less competitive and rarer species. Prolonged drawdown of the site water levels will result in a loss of wetland interest.

4.6.2.16 These combined site development impacts on Sizewell Marshes reduces surface water flows to Minsmere South Levels from two drains with dissipated wetland surface flows, to one pinch point with potential for raised water levels, flows and water quality / sedimentation impacts.

4.6.2.17 With regards to the SSSI crossing, detailed hydrological and hydro ecological conceptual (HCM) modelling is required to determine:

- Comparisons between the SSSI crossing bridge design and causeway/culvert design on both sides.
- The potential impact of the causeway/culvert design on hydrological connectivity between Sizewell Marshes and Minsmere South Levels
- The potential impact of the increase in flow from the culvert (as opposed to two drains and a wetland complex) on Minsmere South Levels

- The causeway/culvert 'zone of influence' on the wetlands hydroecology e.g. if water levels increase east of the embankment due to creating a 'barrier' to water flow

4.6.2.18 With regards to the Sizewell Drain, the PEI states that "*The realignment of the Sizewell Drain and the construction of associated water control features would enable manipulation of the water levels within Sizewell Marshes SSSI, and would help to ensure that any alterations to the hydrological regime caused by construction activities can be brought back to the correct parameters needed to safeguard wetland habitat…Initial hydrological modelling suggests that the changes in levels would be minor and that a control structure such as a sluice on the Sizewell Drain would enable control of water levels to optimise conditions within Sizewell Marshes SSSI. If a control structure is successfully deployed, then there is unlikely to be a significant adverse effect on the hydrology of Sizewell Marshes SSSI. Further detailed hydrological modelling and assessment will be undertaken"* (**Vol 2A***,* paras 2.3.18 and 2.3.31, pg. 24 and pg. 27). We advise that the information required from the more detailed hydrological monitoring in this regard includes:

- The hydrological and hydro ecological regime of Sizewell Marshes pre and post Sizewell Drain ditch realignment.

- How have the parameters needed to safeguard wetland habitat been calculated / assessed?

- The water control features to be used and how they will mitigate impacts from the SCZ project.

- What are the contingency arrangements if control structures are not successfully deployed?

4.6.2.19 As per our more general advice on the project as a whole under section 4.5 above, there is also the potential for impacts from construction works on Sizewell Marshes due to the surrounding substrate. This raises further concerns regarding the proposed causeway/culvert design for the SSSI crossing and realignment of the Sizewell Drain. Both will decrease hydrological flow paths between Sizewell Marshes to Minsmere South Levels. This could increase the risk of the drain silting up and associated flooding. The works may also limit the natural capital capacity of the wetland to deal with impacts on water quality.

4.6.2.20 In general, we therefore agree with EDF Energy's conclusion that there may be potentially significant ecological effects to designated sites arising from the MDS proposals, which includes the SSSI crossing element and realignment of the Sizewell Drain (**Vol 2A**, Tables 2.11.1 and 2.11.2, pp. 99-100). However, we note that the tables at the end of the flood risk chapter of the PEI (**Vol 2A**, Tables 2.12.7 and 2.12.8, pp. 114-117) indicate that affects are likely to be 'negligible', whilst Tables 2.3.1 and 2.3.2 (**Vol 2A**, pp. 30-36) appear to indicate that effects on the hydrological regime will not be significant. We advise that such effects are potentially significant and that these tables need amending accordingly.

Wider ecology, including protected species

4.6.2.21 The removal of a temporary bridge (as per Option 3 as proposed at Stage 2) would also be beneficial to the functioning of the ecological corridor, as semi-natural vegetation could subsequently be established. During construction, a key issue is whether certain mobile species, such as birds, bats, water vole and otter, would be able to use the crossing as the environmental conditions around the

entrance may be too disturbing; the crossing will carry heavy traffic between the (very noisy and well lit) construction areas of the main power station platform and the common user facilities area. As we advised at Stage 2, we consider that further information is needed about the likely conditions (noise, light, vibration etc.) that would be experienced during the construction phases at SSSI ground level at the entrances to the proposed crossing and any mitigation that can realistically be put in place to minimise the level of disturbance.

4.6.2.22 We note from the consultation documents that "*The crossing has been designed with ecology in mind. The culvert is significantly larger than is required for operational purposes and provides sufficient dimensions to leave the bank and channel of the Leiston Drain completely intact. The culvert would be of sufficient size to facilitate the passage of bats and water voles through the structure and retain its function as an ecological corridor. A ledge would also be installed to enable passage by otters*" (**Vol 1**, para 7.4.66, pg. 184). However, limited information has been provided regarding the internal dimensions and design of the proposed culvert (**Vol 2A**, para 2.3.18, pg. 24). We advise that further detail is needed on the design of the culvert (e.g. the statement that the banks of the drain would remain completely intact suggests that the sides of the culvert would not be concreted?). Further information is also required on what is meant by "*sufficient size to facilitate the passage of bats and water voles*" (e.g. is there any research available from similar projects to evidence that a culvert of this design and of these dimensions would likely be used by mobile species such as bats, water vole, otter etc?). We have also previously raised concerns (2016) that a culvert design may act as a wind funnel which could have ecological implications and we therefore reiterate that this should be further assessed within the full ES.

4.6.2.23 Retaining the existing earth banks and bed of the drain would be far more likely to retained water vole habitat connectivity, than installation of a concrete culvert. No water vole survey information has been provided to Natural England to date. However, where it would be considered necessary to relocate water voles by displacement during the construction of the culvert, sufficient adjacent habitat of suitable quality must be available or created in advance of the works. It should be noted that this activity will require a licence from Natural England.

4.6.2.24 Further information is also needed about likely conditions (noise, light, vibration etc.) that would be experienced during the operational phase at the SSSI crossing. It is noted that monitoring is proposed to ascertain that it is not presenting a barrier to the movement of water voles and otters and to determine if remedial action required however monitoring should also include bat movement.

4.6.2.25 Landscaping following the removal of the temporary haul road should consider the inclusion of tree/hedgerow to increase connectivity of bat habitat.

4.6.2.26 With regards to the reedbeds which have been provided as part of the Aldhurst Farm habitat creation scheme, we assume that the displacement technique is to be used to move water vole rather than trapping and relocating them to Aldhurst Farm. We therefore require confirmation on this. It must be ensured that sufficient suitable habitat is available for water voles to move into (which may require enhancement).

4.6.2.27 As previously noted, the consultation documents state that "*Following the construction phase, the temporary haul road would be removed and landscaped*" (**Vol 1***,* para 7.4.68, pg. 184). We advise that further detail is needed on this (e.g. will this landscaping include tree/hedgerow planting to aid bat passage across the width?)

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.2.28 We believe that the priority for the SSSI crossing is to protect, as far as is possible, the integrity of the internationally and nationally important wetland habitats. The quality of this wetland is an important landscape feature as well as a key biodiversity asset. In our Stage 2 consultation response we said *"In terms of landscape impacts and visual screening, the establishment of trees on a causeway with culvert would help to integrate the crossing into the surrounding landscape, provided the trees are indigenous to the site*". The current consultation talks about allowing the slopes of the culvert to vegetate naturally. It would also be helpful to have some active planting to give that process a good start, establish the best planting structure and species mix and to achieve the fullest integration of the culvert into the landscape as soon as possible.

4.6.2.29 We advise that you should consider whether the need to transport any Abnormal Indivisible Loads (AILs) via the haul road will restrict the ability to plant up the embankment during the construction phase, which may constrain any landscape mitigation in the short term.

4.6.3 **Combined Drainage Outfall (CDO), cooling water infrastructure and Fish Recovery and Return (FRR) system**

Impacts on ecology

4.6.3.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

4.6.3.2 We note that the cooling water infrastructure design has not changed significantly since the Stage 2 consultation. Our comments on this as provided at Stage 2 are therefore still relevant; as stated in that response, the detailed intake and outfall tunnel and tunnel head design options should be presented in the full ES and their potential impacts on the marine natural and physical environment should be assessed.

Designated sites

4.6.3.3 As previously advised (see para 3.9.9 above), any risk of a reduction in or loss of a terrestrial or marine European site should be judged to be a LSE, and the full significance of its impact on a site's integrity should be further tested by AA. The FRR, CDO, cooling water infrastructure intakes and outfalls, thermal and chemical plumes may result in a direct/indirect loss of habitat from the Southern North Sea SAC and the Outer Thames Estuary SPA. We advise that sufficient detail on this must be provided within the full ES, clearly identifying whether or not the proposed development would affect the Conservation Objectives of the designated features, to complete AA.

4.6.3.4 We are aware of the work done to date to find the best suitable design for these elements and would advise that a summary of the working process is presented in future documents as justification for the choice of tunnel design, length and position. As previously advised (see para 4.5.6 above), Fig 7.52 of the consultation documents (**Vol 1**, pg. 229) indicates that the CDO route may pass through the SSSI and clarification is therefore required on this in terms of potential impacts as proposed and consideration of alternative designs/routes. Potential in-combination effects with Sizewell B should also be assessed and presented in the ES.

4.6.3.5 Careful consideration should be given to the potential effects of the discharge plume on the integrity of the Sizewell Bank throughout the lifetime of the project. Appropriate measures should be taken to minimise the scour of the seabed adjacent to the outfall tunnel head. Sufficient evidence should be provided to justify why an offshore location of the outfall tunnel reduces the environmental effect of the warm water plume. Any residual effects of the increase in ambient water temperature on the marine biological receptors should be considered, in light of current and future baselines.

4.6.3.6 The potential effects of tunnelling works for the FRR system should be assessed alone and in-combination with the main intake and outfall tunnels. The developer should consider impacts on the marine physical environment of the structure itself, as well as assess the effectiveness of the FRR system in providing appropriate mitigation for marine fish.

4.6.3.7 The cooling water infrastructure may have impacts to marine life associated with entrainment and impingement of organisms. We appreciate that some work has already been done to minimise the potential effects to marine ecology by selecting appropriate outfall locations, plans to install a fish deterrent system and a FRR system. The ES should provide an assessment of the proposed mitigation and suggest appropriate monitoring plans to demonstrate the effectiveness of the above measures when installed.

4.6.3.8 The ES should consider the effectiveness of FRR in providing mitigation for different species of fish and consequently effects on the population. Survival rate and fitness of individuals after release through the FRR system might be an area that could be could investigated further. In particular in relation to species of conservation importance, and through the food web the prey species on which they rely.

4.6.3.9 If the underwater structures are buried under the seabed at the construction phase it is expected that they will remain buried throughout the lifetime of the project (i.e. no exposure due to sediment movement, storm events). Appropriate construction methods and design should be put in place to ensure this is the case and that additional remedial works will not be required during the operational/ decommissioning phases.

4.6.3.10 We advise that sufficient evidence should be provided in the ES to show that the proposed boring method of installation is appropriate for the seabed type encountered in the area, before stating this will be the chosen technique. Alternatively, all other potential methods of installation and their impacts need to be considered in the ES. Similarly the likely success of the drilling method for installing piles at the FRR, CDO heads should be clearly stated, and other potentially required engineering designs presented as alternatives.

4.6.3.11 The operational plumes should be assessed for potential impacts on marine mammals, both for now and future baseline water temperatures. The full ES should consider the importance of the area for foraging harbour porpoise.

4.6.3.12 Avoidance of thermal and/or chemical plumes by some fish species has the potential to cause food web effects. Food web effects from potential avoidance behaviour of operational discharges should be assessed as part of the full ES and the in-direct effects on designated bird and marine mammal features assessed as part of the shadow HRA.

4.6.3.13 Changes to the thermal regime of the coastal waters as a result of direct sea water cooling could affect the structure of plankton and benthic communities which in turn could affect qualifying interests through a reduction in prey availability.

Consideration should be given to all Annex I species for which the site is designated within the full ES/shadow HRA/RIAA (as appropriate) and any mitigation outlined.

4.6.3.14 Changes in either the marine sediment or the water quality of the area have the potential to adversely impact on the prey species and habitats of the features of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA and the Southern North Sea SAC. Suspended sediment concentration (SSC), chemicals entering the marine environment and the thermally buoyant tidally advected plume, all have the potential to impact the marine sediment and water quality.

4.6.3.15 If during construction, two cooling water intake tunnels and one outfall tunnel would be excavated by tunnel boring machines (TBM) from landward, we would expect to see an assessment for a worst case scenario of the release of drilling muds and bentonite to the marine environment.

4.6.3.16 The Chlorination Strategy should be assessed within the ES and HRA, as well as being agreed with the Environment Agency for the Operational Water Discharge Activity. The Total Residual Oxidant (TRO) concentrations in the plume should be assessed against the conservation objectives of the designated sites.

4.6.3.17 The potential Hydrazine input and embedded mitigation should be clearly outlined, and any residual impacts stated. The worst case scenario, i.e. during wet lay up of steam generators an exceedance of the chronic predicted no effect concentration, should be assessed against designated features and the prey species upon which they rely.

4.6.3.18 If the installation of cooling water infrastructure, the FRR system, and the CDO would require capital dredging, most likely via a cutter suction dredger with spoil disposed on-site, then any potential water and sediment quality impacts should be assessed within the ES. The impact of increased suspended SSC should be assessed against designated features, and the prey species upon which they depend.

4.6.3.19 The disposal sites for drilling spoil should also be clearly shown and any potential impacts on designated features clearly outlined.

4.6.3.20 The effects of changes to marine water quality, including thermal and chemical changes arising from cooling water discharge during operation of the station, and changes arising from the discharge of products of dewatering operations, sewage etc. and dredging during construction must be evaluated for their impact on designated features and their prey species. The ES should provide an indication of the area of the potential impact of the discharge plume, in terms of increase in sea water temperature, concentrations of added chemicals, scour of benthic habitats and increased turbidity. The combined effects of warm and chlorinated water on marine ecology should be considered. The chlorination strategy should be clearly outlined and the worst case scenario established.

4.6.3.21 The PEI states that the FRRs and CDO outfall positions were chosen for optimal functionality, ecology and water quality. The alternative positions and hydrodynamic modelling should be presented within the ES.

4.6.3.22 We would expect predicted water quality being discharged by the CDO to be presented, including discharges of bentonite and TBM chemicals. We would also expect an assessment of bentonite breakout within the marine environment to be completed.

4.6.4 **Beach landing facility (BLF)**

Impacts on ecology

4.6.4.1 As previously acknowledged above, the large jetty/MOLF which was presented as an option for delivery of materials to the MDS under the marine-led strategy at Stage 2 has been discounted at Stage 3. However, we note that a smaller BLF remains part of the proposals to facilitate the movement of some large and AILs to the MDS. Although the BLF has lower potential for environmental impact when compared to the MOLF, this still needs to be fully considered in terms of the various environmental constraints. We advise that some direct comparison of the effects which made the MOLF unfeasible in environmental terms against the BLF which is considered feasible by EDF Energy is therefore required.

4.6.4.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

Designated sites

4.6.4.3 ***Habitat loss***: As previously advised (see para 3.9.9 above), any risk of a reduction in or loss of a terrestrial or marine European site should be judged to be LSE, and the full significance of its impact on a site's integrity should be further tested by AA. The BLF jetty and dredge area may result in a direct/indirect loss of habitat from the Southern North Sea SAC and the Outer Thames Estuary SPA. We advise that sufficient detail on this must be provided within the full ES, clearly identifying whether or not the proposed development would affect the Conservation Objectives of the designated features, to complete AA.

4.6.4.4 ***Capital and Maintenance Dredging*****:** Further information is required with regards to the proposed dredging operations, i.e. area, volume, timing and frequency. It will be necessary to assess the potential impacts, particularly regarding disturbance, noise, suspended sediment plumes, and coastal geomorphological impacts entailed with breaking through the inner and outer longshore bars. We note from the consultation documents that, during construction, "*Material quantities estimates…have been subject to validation and development since Stage 2, but still remain provisional at this stage"* (**Vol 1**, para 5.4.16, pg. 97). The ES should provide an accurate prediction of the potential impacts of capital and maintenance dredging during the construction, operational and decommissioning phases on sensitive receptors.

4.6.4.5 The PEI states that "*Dredged sands would remain close to the bed during the plough or scraper operation and there would be no net loss of sand from the longshore bars*" (**Vol 2A**, para 2.14.17, pg. 123). Natural England welcomes that there would be no net sediment loss from the sediment cell and would expect to see further information on where dredged material will be deposited within the ES.

4.6.4.6 The ES should also clearly identify how many deliveries of AILs will be made during the operational and decommissioning phase of the project, and a worst case scenario established. The PEI states that "*A dredged navigation channel and grounding area would be needed to support the transit and docking of barges for approximately two weeks every five to ten years. BLF usage would be most likely during the low wave energy season (31 March to 31 October)*" (**Vol 2A**, para 2.14.32, pg. 124). The total number of dredging events and the extent of maintenance dredging should therefore be assessed in the ES.

4.6.4.7 We advise that there is currently insufficient information provided regarding the dredge channel for the BLF to establish 'No LSE' as is stated in the PEI (**Vol 2A**,

Table 2.14.1, pg. 127). Further information is required on the extent, volume, duration and recoverability of sandbars in order to determine likely impact pathways on designated sites and features.

4.6.4.8 ***Jetty Piling****:* The BLF proposed in PEI incorporates 14 jetty piles, two fender piles and a dolphin pile (**Vol 3**, Figure 2.14.1, pg. 38). There is currently insufficient information available within the PEI to assess the potential impact of the piling on the Southern North Sea SAC or Outer Thames Estuary SPA. Natural England would expect to see more information provided within the ES with regards the proposed construction methodology, timing and potential impacts. Any Construction Management Plans or Marine Mammal Mitigation Plans should be submitted as part of the DCO.

4.6.4.9 ***Temporary rock platform****:* Natural England seeks further information on whether the temporary rock platform for the BLF construction will be taken forward or not.

4.6.4.10 ***Shipping:*** As highlighted in our response to the Stage 2 consultation, we advise that the potential impacts of shipping must be considered within the ES. We would expect material quantities for marine delivery to be accurately predicted and presented within the ES including predicted numbers and timing of delivery of AILs, and presence of dredging vessels – with predicted vessel movements per annum during construction, operation and decommissioning phases of the development – presented. The assessment should include spatial and temporal considerations with regard to seascape, and disturbance to the Minsmere to Walberswick SPA, Outer Thames Estuary SPA and the Southern North Sea SAC. These impacts should also be assessed in-combination with other proposed development i.e. East Anglia Three offshore wind farm, as the timing of construction may coincide with that of Sizewell C. Any Construction Mitigation Plans should be submitted as part of the DCO.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.4.11 From a landscape and seascape perspective we welcome the decision not to construct a jetty but instead rely on the beach landing facility (**Vol 1**, para 7.5.95). This is a positive change both for the AONB and for long views along the Heritage Coast.

4.6.4.12 From the information presented within the consultation documents, it is estimated that the BLF would be used infrequently during operation, approximately every 5-10 years for a few weeks at a time (**Vol 1**, para 7.5.98, pg. 228). We understand that the BLF panelling will removed when the BLF is not in use. In terms of landscape impacts, we welcome this and advise that the location for temporary storage of the panels once removed should be confirmed and should avoid impacts to the AONB.

Impacts on access

England Coast Path (ECP)

4.6.4.13 During periods when the BLF is in use, we welcome the commitment to keeping any necessary beach closures to a minimum (**Vol 1**, para 7.5.98, pg. 228). Natural England advises that consideration must be given to the impacts of any such temporary closures on the ECP, and the need for mitigation such as facilitated access or provision of alternative temporary diversion routes.

4.6.4.14 Our preferred option would be for EDF Energy to employ a banksman at the

location to let walkers through as required during use of the BLF, as was employed successfully during construction of Sizewell B. We advise that this option would:

- Avoid interruption to a (about to be proposed) National Trail
- Retain an asset valued by the local community and particularly local dog-walkers
- Reduce potential recreational displacement impacts on other sensitive sites
- Avoid a long and in places unpleasant, diversion
- Reduce the safety risk to walkers who on this diversion are forced to cross the road at several points
- Retain a route for walkers only, so that people are not forced into close proximity with other user types

4.6.4.15 With regards to the proposed alternative temporary diversion route, it is not clear from Fig 17.17 and Fig 17.18 of the consultation documents (**Vol 1**, pp. 394-395) where the currently proposed route would go in relation to the road, or fences or hedges which mark the extent of highway rights. We advise that more detailed maps of any proposed temporary route at a larger scale are required before we can provide further comment.

4.6.4.16 In terms of walker safety, the proposed alternative temporary diversion route would seem to include a large number of crossing points, five of which are proposed to be managed in some way. It is not clear from the information provided why walkers are being asked to cross the road and increase the risk to their safety so many times. An explanation of this would be helpful before we are able to provide further comment. Also, as above, it is not clear from the maps where the walker would be in relation to road, verge, fence, hedge, etc. or whether the sight lines at crossing points are adequate (especially if unmanaged). More detail is therefore required on this point.

4.6.4.17 With regards to the proposed temporary diversion route at Minsmere Sluice, this does not quite follow the line of the temporary diversion as agreed between Natural England and the Royal Society for the Protection of Birds (RSPB) and so will need revising accordingly.

4.6.4.18 There does not appear to be any detailed information in relation to the length of time a temporary route might be required for during the construction phase or any subsequent use of the BLF (for AILs) during the operational phase. We therefore advise that further information is required about the timings of each phase to understand the impact on the ECP and whether a temporary route is the appropriate mechanism for dealing with the unavailability of the main trail before we are able to provide further comment (i.e. when, how often and for how long?).

4.6.4.19 We note that part of the proposed temporary diversion route goes through Aldhurst Farm habitat creation scheme. As such, we advise that the potential for conflict between access mitigation (such as any temporary diversion) and ecological mitigation (e.g. any compensation for SSSI habitat loss, protected species mitigation etc.) must be fully considered in the ES.

4.6.4.20 We also consider that consideration to be given to possible 'roll back' options for the ECP during the construction, operational and decommissioning phases of the project to accommodate any predicted migration of the coastline during the Sizewell C project lifetime. Consideration of the ECP should also take account of any beach nourishment/recycling that may be required and the scale and duration

of this and closures required for this.

4.6.5 **Coastal defence features (CDF) – hard coastal defence feature (hCDF) and soft coastal defence feature (sCDF)**

Impacts on ecology

4.6.5.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

Designated sites

4.6.5.2 Natural England has insufficient evidence so far of the predicted change in coastal geomorphology and resultant impacts on the designated sites in the area. We would expect to see an assessment of the likely impacts of the proposed development on these features against their Conservation Objectives, and the methodology for assessing impact outlined.

4.6.5.3 As previously mentioned, the coastal zone in the region of Sizewell C is likely to change considerably over the lifetime of the power station but the nature, scale and timing of the change is unknown at present. Natural England is keen to see the current mosaic of freshwater and brackish wetland habitats in the Minsmere Valley, and the birds they support, conserved *in situ* for as long as they are sustainable. At the same time it is understood that the coast in the vicinity of Sizewell and Minsmere is dynamic and that a shared plan, with bodies responsible for the management of this stretch of coast, including the Environment Agency and the RSPB, is needed for managing the site's long term adaptation to predicted sea level rise and climate change. Against this background, any potential effects of the Sizewell C development on the geomorphology and hydrodynamic processes which shape the alignment of the coast, need to be thoroughly and properly understood and assessed. The conditions which support the features of Minsmere to Walberswick Heaths and Marshes designated sites, and any significant impact of the development on them, must be assessed in the short, medium and long term as far as possible (to include construction, operation and decommissioning).

4.6.5.4 During the lifetime of the Sizewell C project the hCDF may become a prominent point with the continuous shingle beach of the Greater Sizewell Bay (GSB) split into two by the emergent north-eastern corner of the hCDF. The hCDF could slow down movement of shingle South, therefore shingle to the North may become more stable, and the shingle to the South may see a corresponding decrease. Natural England would expect to see the implications this may have for the designated features of the sites (Ramsar sites, SACs, SPAs, SSSI, CWS) outlined within the ES, HRA and RIAA as appropriate. Moreover the hCDF may in time, as the coastline moves, disrupt the inshore and offshore sandbars. The implications for longshore drift and movement within the sediment cell should be considered and impacts pathways for designated sites be outlined within the ES, including in combination effects with Minsmere Sluice outfall.

4.6.5.5 The PEI states that the project will "*Maintain the SCDF to avoid the SCDF splitting the shingle beach into northern and southern halves, which would progressively block the transmission of shingle – this would minimise any effects on longshore transport*" (**Vol 2A**, Table 2.14.2, pg. 127). However, the sCDF as maintained by beach nourishment or recycling, may also split the shingle beach into two halves and disrupt longshore transport in this area, and this should be assessed within the ES.

4.6.5.6 Natural England notes that the Shoreline Management Plan (SMP) Policy for

Sizewell Power Station and Village is to 'Hold the Line' until 2105. The construction of the hCDF will likely mean the management policy will remain 'Hold the Line' and this should be duly considered and confirmed within the ES, including any assessment of potential impacts on designated sites. The construction of the hCDF will require that the SMP maintains a 'Hold the Line' strategy for the operational and decommissioning stages of the development and will therefore need to be extended to at least 2180.

4.6.5.7 The PEI states that sacrificial sediments of the sCDF will be put in front of the hCDF and be maintained throughout the life of the project (construction, operation and decommissioning). It was suggested that this could be completed through sediment recycling or beach nourishment. Natural England cannot comment on the impact on designated sites until further information is provided. In particular we would expect further detail to be included within the ES with regards sacrificial sediments of the sCDF, for example;

- Clarification on whether nourishment or shingle recycling is the preferred option;

- Where the sediment would be won from, volumes likely required in order to retain a sCDF in front of the hCDF for the duration of the operational and decommissioning phases based on a worst case scenario for climate change and sea level rise (we presume volumes required will also increase as the coast and foreshore retreat).

4.6.5.8 Potential impact pathways and LSE that beach nourishment/recycling may have on designated sites up and down drift of Sizewell C should be clearly outlined within the ES and HRA. We would also expect to see details of alternative approaches assessed.

4.6.5.9 Natural England welcomes the commitment to regular monitoring of the coast using remote (radar, fixed cameras, drones, Light Detection And Ranging (LiDAR)) or traditional survey (terrestrial and bathymetric) techniques. These methods would be used to quantify beach nearshore topography and volume. We would expect trigger points for remedial/mitigation works to be established within the ES and any Construction Mitigation Plans.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.5.10 We note that the final main sea defence will be 10.2 metres high but with a retained option to raise this to 14 metres in the future if necessary. The Stage 3 consultation documents confirm the use of rock armour. In much earlier discussions with EDF Energy we have asked whether beach materials placed on top of rock armour would adhere to that surface (**Vol 1**, para 7.4.78). If not, it would be vulnerable to tidal surges and storms. There appeared to be no answer to this and so we might assume that either that material would need to be regularly replaced or eventually the rock armour would be permanently exposed to the detriment of landscape character and quality. It would be helpful for EDF Energy to address this issue and to discuss with us whether and how this might be mitigated.

4.6.6 **Northern mound**

Impacts on ecology

4.6.6.1 We note the intention to remove the current 12 metre vegetated mound and

replace with a 14.2 metre earthwork during the construction period (**Vol 1**, paras 7.4.72 – 7.4.74, pg. 184) and advise that this must consider potential impacts on designated sites and protected species. See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.6.2 From a landscape perspective, we are pleased that this aspect of the proposals would be progressed as early as possible during the construction phase so that its screening potential can begin to be realised early on and so that new vegetation can be reasonably well established for the start of the operational life of the power station. Given the height and overall size of the new mound it is likely to appear as a prominent feature and one which is clearly artificial. This however needs to be set against the benefits of screening lower parts of the power station where possible. The 'photowire' included in the PEI for representative viewpoint 6 shows how effective this could be (**Vol 3**, Figure 2.2.8, pg. 9). The other new sea defences will also be present as new and significant features within this landscape. The combination of these changes will be a major and permanent remodelling of this part of the coastal landscape. We can accept that this may be essential for protecting the power station but it is important that this significant change is openly recognised and not played down so that those who live in, visit and are involved in managing the AONB know what to expect.

4.6.7 **Spoil management proposals, including stockpile areas and borrow pits**

4.6.7.1 We note that the spoil management area locations have progressed since Stage 2. The main soil stockpile area is around Upper Abbey Farm within the AONB. The secondary soil stockpile areas are west of Fiscal Policy wood and adjacent to Eastlands Industrial Estate which are outside the AONB but within its setting.

Impacts on ecology

4.6.7.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

4.6.7.3 We advise there is a risk to designated sites from acidic leachate as a result of backfilling any borrow pits with unsuitable materials mix. Further detail is therefore required in this regard. We also advise the interaction of the stockpile areas and borrow pits should be fully assessed within the ES to ensure that they do not conflict with any of the ecological mitigation within the vicinity (e.g. the marsh harrier mitigation land, the Aldhurst Farm habitat creation site etc.).

4.6.7.4 We advise that the soil stockpile areas present opportunities for wildlife benefits through planting up with native species mixes (where appropriate, depending on timescales, works phasing etc.). This should be considered in terms of potential net gain in biodiversity when assessed against the current baseline ecological value of the site.

4.6.7.5 The latter stockpile, along with the secondary contractor compound and shared facilities area, is within a land parcel which forms part of a Higher Level Stewardship (HLS) agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.7.6 We note that since Stage 2 the borrow pits in Field 2, Field 3 and Field 4 have been taken forward into Stage 3, whereas Field 1 has been discounted. As you will be aware, Fields 2, 3 and 4 are wholly within the AONB with Field 3 and 4 surrounding Ash Wood and Field 3 close to land which may be required for marsh harrier mitigation. Field 1 was outside the AONB but within its setting and did not surround Ash Wood which is likely to be used by protected species and which the presence of a large stockpile and/or borrow pit would be likely to impact. Field 2 is within the AONB but is also separated from Ash Wood. With these constraints in mind, Natural England advised at Stage 2 that our preferred option was *Option 1: Field 1 and 2* as this appeared to represent the least impact on wildlife and landscapes.

4.6.7.7 It is therefore disappointing that our preferred option at Stage 2, as that which would cause the least environmental impact to the protected landscape and biodiversity interest, has been disregarded at Stage 3 in favour of an option which is likely to have a greater impact in this regard.

4.6.7.8 The main stockpile may reach 15 metres in height and will remain in place until needed for final reinstatement of the construction site. This and the borrow pits, plus construction compounds and road / rail infrastructure will utterly change the appearance of this part of the AONB for the duration of the construction phase. From a protected landscape perspective our priority is to ensure that this area can be reinstated to a standard commensurate with its AONB status and as envisaged by the EDF Energy estate strategy. This includes the soil stockpile area on the LEEIE which is outside but immediately adjacent to Suffolk Coast and Heaths AONB and therefore within its 'setting'. The careful conservation of stockpiled soils will of course be vital to achieving that high standard of reinstatement.

4.6.8 **Accommodation campus and temporary caravan site on the LEEIE**

Impacts on ecology

4.6.8.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to these aspects of the proposals.

Designated sites

4.6.8.2 We note that the Upper Abbey Farm accommodation campus on the MDS would include 2400 bed spaces. This is in addition to a temporary caravan site on LEEIE which would be equivalent to 600 bed spaces (**Vol 1**, para 5.3.1, pg. 90). The consultation documents states that "*a workforce of around 6,100 workers is anticipated at the peak of the construction phase, comprising 5,600 workers on the main development site plus 500 workers at the associated development sites*" (**Vol 1,** para 1.2.8, pg. 7) but acknowledges that this might figure may rise to a higher figure of up to 7,900 workers (**Vol 1**, paragraph 2.1.8, page 15).

4.6.8.3 As we have previously advised, these aspects of the proposals are likely to result in increased recreational pressure to internationally and nationally designated sites in the area (i.e. SACs, SPAs, Ramsar sites and SSSIs). This can have detrimental effects on the sensitive features for which these sites are notified, both on habitats and species. As such, the potential for increased recreational pressure to these sites must be fully assessed, both arising from the workers themselves and as a result of displacement of local people from areas which they currently

use for recreation (e.g. dog walking) to more sensitive sites in the local area. We therefore welcome that a rights of way and access strategy will be submitted within the full DCO application/ES (**Vol 2A**, para 2.3.18, pg. 24); we advise that this should detail the recreational disturbance impact assessment and associated conclusions, including any mitigation measures which might be necessary.

4.6.8.4 As previously mentioned, with regards to the staff accommodation, the consultation documents state that "*if more accommodation was needed for workers EDF Energy would not expand the campus but we anticipate that local landowners would respond with proposals to create or extend one or more local caravan parks*" (**Vol 1**, paragraph 2.1.8, page 15). We advise that any such proposals would themselves need to be considered in terms of the ecological constraints of the local area, including the potential for increased recreational pressure to designated sites.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.8.5 The proposal remains to have this outside the AONB but within the immediate setting of the designated landscape. This remains a concern but we welcome the revised proposals for the campus set out in the PEI (**Vol 2A**, section 7.6, pp. 231 – 239), especially to locate sports pitches on a different site within Leiston. This will remove a noisy organised sports well away from the AONB so that they do not impinge of peoples' enjoyment of the designated landscape and its special qualities. We also welcome the revised plan to use three to four storey buildings instead of buildings up to five storeys.

4.6.9 **Training building**

4.6.9.1 We note the a training building is proposed to be located to the south-west of the proposed main car park on the north side of Sizewell Marshes SSSI (**Vol 1**, paras 7.4.45 – 7.4..52, pp. 179-180).

Impacts on ecology

4.6.9.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.9.3 We note the reasons for locating the training building within the MDS (proximity to the power station for trainees) and the implications of a combined training facility for Sizewell B and Sizewell C (a single but larger building). We question however, whether the proximity case is sufficient to provide the exceptional circumstances needed to justify this development within the AONB. We therefore advise that EDF Energy provide full details of why this facility must be located within the AONB and set out what alternatives have been considered. If exceptional circumstances are fully demonstrated and the training facility is located here we note the positive intention to create a single story building with other design attributes to reduce its impact on the site and its setting.

4.6.10 **Emergency equipment store and backup generator (Combined Heat and Power (CHP) plant)**

4.6.10.1 We note the proposal for these buildings in the area near to Upper Abbey Farm (**Vol 1**, para 7.4.85, Figures 7.24 and 7.25, pp. 189-190).

Impacts on ecology

4.6.10.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.10.3 We note that these proposals will lie outside the AONB but within its immediate setting. The LVIA will help us to understand whether and how they could impact on the statutory purpose of the designated area. In the meantime we welcome the promise to design buildings which, in terms of style and building materials, are in keeping with their location.

4.6.11 **New electrical substation, with associated infrastructure including electrical connections (underground)**

4.6.11.1 We note the proposal for this building in the area near to Upper Abbey Farm (**Vol 1**, para 7.4.96 – 7.4.99 and Figure 7.26, pg. 191)

Impacts on ecology

4.6.11.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.11.3 We consider that the works to bury the electricity supply cable has the potential to further disrupt hydrological flows in Sizewell Marshes. As stated in the consultation documents, "*The Sizewell Belts Drainage Unit receives water from run-off from the catchment draining to the Leiston Beck and higher ground to the west of Kenton Hills and Leiston Common"* (**Vol 2A**, para 2.11.13, pp.95-96) *.*

4.6.11.4 Cable installation works, as proposed, will cut directly across Leiston Beck and disrupt flows from the upper catchment into Sizewell Marshes SSSI. The proposed cable installation works (and most of the works north of the SSSI) are sited on *'deep well drained sandy soils belonging to the Newport Soil Association'.* According to the LandIS website, this substrate is classed as vulnerable to leaching and highly erodible, raising significant concerns for water quality and clarity impacts which will need assessing further in the ES.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.11.5 It is unclear whether and how the substation could impact on the AONB. The undergrounding of an electricity cable with trenching north of Sizewell Gap will need to be undertaken with care to avoid a permanent change in soil conditions, drainage and therefore vegetation cover serving to mark the route of the cable

across country. The preservation and careful replacement of soil from the cable trench is obviously key here.

4.6.11.6 We know from other schemes that the burying of cables or pipelines across arable land or ordinary pasture land can be achieved without this surface scaring. For other more sensitive habitats the results can be less successful especially if drainage patterns are disrupted. We understand that trees and other deep rooted vegetation cannot be allowed above the cable route and that some surface infrastructure, notable 'link boxes' are required to mark joins in the cable and to house monitoring equipment. If this applies at Sizewell then then provision should be made for appropriate mitigation.

4.6.12 **Water management zones**

Impacts on ecology

4.6.12.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.12.2 We welcome that the water management zones have been increased in number and size since Stage 2 to help ensure that they can attenuate and, if required, treat surface water run-off prior to discharge to either watercourses or to the ground (**Vol 1**, paras 7.5.102 – 7.5.103, pg. 228). It is important that they are adequately designed so that they do not overtop and take water and sediment down into the ditch/drain system of the SSSI. They should also be designed such that the hydrological functioning of any adjacent water dependant habitats are maintained, or enhanced where natural hydrological functioning has already been adversely affected.

4.6.13 **Site entrance hub, contractor compounds and shared facilities areas, access road and haul road**

Impacts on ecology

4.6.13.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.13.2 At the Stage 2 consultation we noted the intention to use the natural landform and to retain and enhance some wood areas to help screen the contractor compounds. We assume that this remains the intention. Site management and careful planning to enable removal of construction phase infrastructure like the haul road is vital. In terms of retained infrastructure we welcome the continuing commitment to reduce the access road's width after the construction phase and otherwise provide a permanent design more characteristic of a country road. We advise that this will require careful consideration of the road surface, alternatives to hard kerbing and minimising signage and lighting (we note the proposal not to light the road except at particular operational and parking areas). This is because those elements would be strong urbanising features and subvert the stated intention to establish a 'country road'.

4.6.14 **Relocation of Sizewell B facilities**

4.6.14.1 We note that the consultation documents include details on the relocation of Sizewell B facilities currently located on the proposed Sizewell C main platform site to new sites within and adjacent to Sizewell B (**Vol 1**, pp. 175 – 179).

Impacts on ecology

4.6.14.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.14.3 Due to the sensitive nature of the proposed location of the relocated facilities and car park (with associated access) adjacent to Sizewell Marshes SSSI, we advise that alternative options should be fully been considered before progressing with any option which may impact on the SSSI.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.6.14.4 This aspect of the proposals would represent further development within the AONB and a full case should be presented on why this cannot be located outside the designated area and justifying the scale of the development, particularly the car parking components.

4.6.15 **Helipad**

4.6.15.1 We note the proposal for a helicopter landing pad which would serve both Sizewell B and Sizewell C and continue to be used infrequently (**Vol 1**, para 7.4.100, pg. 191).

Impacts on ecology

4.6.15.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.15.3 As requested at Stage 1 and Stage 2, we require further clarification on the usage of the helipad (i.e. how often is defined as infrequent?) as there may be the need to consider further information in order to determine disturbance issues for birds and any other sensitive species (e.g. flight path directions and heights etc.).

4.6.16 **Two village bypass**

Impacts on ecology

4.6.16.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.16.2 We note that these proposals include re-alignment of the river Alde and would

involve construction over freely draining acid soils prone to leaching and erosion and fen peat soils which could potentially disrupt the hydrological integrity of the peat. The River Alde eventually flows into the SAC, SPA, Ramsar site and SSSI some way downstream and so further hydrological assessment is required to enable informed decisions to be made and ensure that adverse effects do not occur.

Protected species

4.6.16.3 Where possible the use of lighting should be avoided to maintain a 'dark sky'. Where it is considered necessary to relocate water voles by displacement, during the creation of crossing points at water courses, sufficient adjacent habit of suitable quality must be available or created in advance of the works. Please note that this activity will require a licence from Natural England. We consider that the principles of the mitigation and compensation are broadly acceptable. However we are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

Wider ecology

4.6.16.4 From the consultation documents it would appear that the proposed route would pass <u>between</u> Foxburrow Wood and Hall Cottages (**Vol 1**, para 12.5.4, pg. 336). However, according to Figures 2.12 and 12.1 (**Vol 1**, pg. 31 and pg. 337 respectively), part of the Foxburrow Wood ancient woodland would be destroyed by the bypass. As set out in NPS EN – 1, "*Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat*" (para 5.3.14, pg. 71). Clarity is therefore required on this issue within the ES.

4.6.16.5 We note from the consultation documents that, if progressed, the road would be approximately 2.4 km in length with 2.5 metres wide verges (**Vol 1***,* paras 2.7.2 and 2.7.3, pg. 31); we advise that this presents excellent opportunities for biodiversity creation through the planting up of verges with native species, particularly given that the intention is to retain the road as a lasting legacy of the project following completion of the power station (**Vol 1**, para 2.7.4, pg. 31). This should be considered in terms of potential environmental net gain when assessed against the current baseline value of the site.

4.6.16.6 We advise that the proposed two village bypass includes land parcels which form part of an HLS agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

<u>Impacts on landscape</u>

Suffolk Coast & Heaths AONB and wider landscapes

4.6.16.7 We advise that this component of the proposals is well outside the AONB . However, the local planning authority's advice on landscape and visual impacts should be sought.

4.6.17 **Yoxford roundabout**

Impacts on ecology

4.6.17.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.17.2 We advise that the roundabout is proposed on land which contains freely draining soil prone to leaching and erosion and which abuts the River Yox/ Minsmere River; this is a 'main river' which flows into Minsmere – Walberswick Heaths & Marshes SAC, SPA, Ramsar site and SSSI some way downstream. We advise that the same risks as indicated for the preferred SLR option apply, though on a smaller scale (see our advice under section 4.7.1 below for further details).

4.6.17.3 Due to the highly sensitive nature and protections afforded to the Minsmere – Walberswick Heaths & Marshes nature reserves, at the very least comprehensive surface water and drainage strategies are key to this aspect of the proposal and further hydrological assessment is required to enable informed decisions to be made and ensure that adverse effects do not occur.
Protected species

4.6.17.4 We note that desk assessments only have been undertaken for this aspect of the project proposals to date. We are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

Wider ecology

4.6.17.5 We advise that this aspect of the proposals presents good opportunities for biodiversity creation through the planting up of landscaped areas with native species, particularly given that the intention is to retain the roundabout as a lasting legacy of the project following completion of the power station (**Vol 1**, para 16.5.12, pg. 373). This should therefore be taken into account when considering this aspect in terms of potential environmental net gain when assessed against the current baseline value of the site.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.6.17.6 We advise that this component of the proposals is well outside the AONB. However, the local planning authority's advice on landscape and visual impacts should be sought.

4.6.18 **Use of Sizewell Halt rail terminal for delivery of construction materials to the main development site in the early years or construction of a new rail siding adjacent to the existing branch line in the LEEIE**

Impacts on ecology

4.6.18.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.6.18.2 We advise that this component of the proposals is well outside the AONB. However, the local planning authority's advice on landscape and visual impacts should be sought.

4.6.19 **Park and ride sites at Wickham Market (southern park and ride) and Darsham (northern park and ride).**

Impacts on ecology

4.6.19.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.6.19.2 We advise that the northern park and ride at Darsham abuts a watercourse which eventually flows into the Minsmere – Walberswick Heaths & Marshes SAC, SPA, Ramsar site and SSSI some way downstream; we therefore advise that further hydrological assessment is required to enable informed decisions to be made and ensure that adverse effects do not occur from these proposals.

Protected species

4.6.19.3 With regards to the proposed southern park and ride, it is written that Whin Belt will be retained in its entirety (**Vol 2B**, para 9.3.13, pg. 482). However, on comparing aerial photos available via internet searches with the plan on Figure 14.2 (**Vol 1**, pg. 352) it appear there will be loss of trees within the development boundary at the south east end of Whin Belt. This is illustrated on the figure as a grassed area surrounded by planting. It is also noted that three trees with potential to support roosting bats are to be removed. Therefore, it is advised that further consideration should be given to the layout in order to minimise the loss of trees on site. [redacted]

4.6.19.4 With regards to the proposed northern park and ride, the retention of three trees with potential to support roosting bats and of the pond with potential to supporting GCN is welcome, as is the replanting of lost hedgerows and trees (**Vol 2B**, paras 8.3.13 and 8.3.14, pp.430-431). It is noted that operational lighting would be designed to prevent spill and exposure on to Little Nursery Wood; lighting should also be directed away from hedgerows and retained trees on site. Any Temporary Amphibian Fencing erected on site should be regularly inspected and maintained until the end of the restoration works. [redacted]

Wider ecology

4.6.19.5 We advise that these aspects of the proposals presents good opportunities for biodiversity creation through the planting up of landscaped areas with native species. However, we note that the intention here is to restore the site to agricultural use following construction of the power station (**Vol 1**, para 2.8.3, pg. 32); this should therefore be taken into account when considering these aspects in terms of potential environmental net gain when assessed against the current baseline value of the sites.

4.6.19.6 We advise that the southern park and ride at Wickham Market is within a land parcel which forms part of an HLS agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.6.19.7 We advise that this component of the proposals is well outside the AONB. However, the local planning authority's advice on landscape and visual impacts should be sought

4.6.20 **Highway improvements**

Impacts on ecology

4.6.20.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Protected species

4.6.20.2 We note that desk assessments only have been undertaken for this aspect of the project proposals to date. We are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts. Where possible the use of lighting should be avoided to maintain a 'dark sky'. As has been specified for the link road proposals, we advise that safe crossing points to facilitate the passage of bats across the road alignment should be incorporated if key foraging or commuting routes are identified.

Wider ecology

4.6.20.3 We advise that the highway improvement proposals present good opportunities for biodiversity creation through the planting up of landscaped areas with native species. However, it is not clear from the documents whether or not these improvements would be retained in the long-term; this should therefore be confirmed and taken into account when considering this aspect in terms of potential environmental net gain when assessed against the current baseline value of the site.

4.7 **Comments on the individual elements of the project as proposed under the road-led strategy only:**

4.7.1 **'Sizewell link road' (SLR)**

Impacts on ecology

4.7.1.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.7.1.2 We note that four SLR options have been considered by EDF Energy and that option Z has been selected as the preferred option at this stage. As is acknowledged within the consultation documents "*The proposed link road is located within the Minsmere Old River watershed"* (**Vol 2A**, para 5.11.1, pg. 300). Furthermore, it is stated that two watercourses that are designated as Main Rivers by the Environment Agency and which flow into Minsmere Old River (which subsequently flows into Minsmere – Walberswick Heaths & Marshes (SAC, SPA, Ramsar sites and SSSI) would be intersected by the proposed link road and that "*From the west, the first Main River reach would be crossed at the Fordley Road junction with the B1122. The second Main River reach would be crossed in Theberton"* (**Vol 1**, para 5.11.2, pg. 300). In addition, it is stated that "*There are several ordinary watercourses that would be crossed by the proposed link road. These are tributaries of Minsmere Old River (***Vol 1***, para* 5.11.3, pg. 300) and that *"As a result, a number of impacts, such as loss and fragmentation of riverine habitat, disruption of riverine processes and loss of floodplain habitats would need mitigation. The road alignment may also disrupt in-channel and floodplain flows and morphological processes" (***Vol 1***, para* 5.11.15, pg. 301).

4.7.1.3 Being sited within the Minsmere – Walberswick Heaths & Marshes hydrological catchment, we advise that this option has the highest potential to impact the hydrological integrity of Minsmere – Walberswick Heaths & Marshes of all the proposed options. We therefore advise that impacts on hydrological integrity of the catchment which flows into Minsmere – Walberswick Heaths & Marshes (both ground and surface water) requires more consideration. Further modification to rivers, loss of rare habitat (floodplain) and reductions in water quality could all contribute to a reduction in catchment Water Framework Directive (WFD) status. The SLR is being constructed over freely draining soils which naturally drain to groundwater; these are prone to leaching and erosion according the LandIS website which lists water protection issues from "*Groundwater contamination with nitrate; siltation and nutrient enrichment of streams from soil erosion on certain of these soils".* Furthermore, we note from the consultation documents that there are "*2,300 vehicles / day expected to use the road during the peak construction period*" (**Vol 1**, para 10.2.3, pg. 312); we advise that such an increase in traffic within the hydrological catchment of Minsmere – Walberswick Heaths & Marshes will increase risks to water quality.

4.7.1.4 Should the road-led strategy be taken forward by EDF Energy as the preferred option, then it is recommended that the other route options are further assessed for their potential impacts on protected sites. Should option Z remain the preferred route for SLR, it is our advice that insufficient weight has been given to the potential impact of this aspect of the development on the site at this stage. Due to the highly sensitive nature and protections afforded to the Minsmere – Walberswick Heaths & Marshes nature reserves, at the very least comprehensive surface water and drainage strategies are key to this aspect of the proposal and further hydrological assessment is required to enable informed decisions to be made and ensure that

adverse effects do not occur.

Protected species

4.7.1.5 Where possible the use of lighting should be avoided to maintain a 'dark sky'. Where it is considered necessary to relocate water voles by displacement, during the creation of crossing points at water courses, sufficient adjacent habit of suitable quality must be available or created in advance of the works. Please note that this activity will require a licence from Natural England. We consider that the principles of the mitigation and compensation are broadly acceptable. However we are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

Wider ecology

4.7.1.6 We note from the consultation documents that, if progressed, the road would be approximately 6.8 km in length with 2.5 metre wide verges (**Vol 1**, para 2.5.2, pg. 29); we advise that this presents excellent opportunities for biodiversity creation through the planting up of verges with native species, particularly given that the intention is to retain the road as a lasting legacy of the project following completion of the power station (**Vol 1**, para 2.5.3, pg. 29). This should be considered in terms of potential environmental net gain when assessed against the current baseline value of the site.

4.7.1.7 We advise that the SLR as proposed contains land parcels which form part of an HLS agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

Impacts on landscape

Suffolk Coast & Heaths AONB

4.7.1.8 All of the route options lie outside the AONB but within its setting. The consultation does not anticipate any significant impacts on the designated area but we expect that the LVIA will determine whether this is actually the case. We cannot therefore comment at this time but will engage with the consultants carrying out LVIA if mitigation measures relating to the AONB are required.

4.7.2 **Freight management facility (lorry holding area)**

4.7.2.1 We note from the consultation documents that the potential for the Seven Hills site to provide a legacy use for port related services has been highlighted (**Vol 1**, para 15.3.4, pg. 364). We advise that if such an option is taken forward in future then full assessment of any associated impacts will be needed in all respects.

Impacts on ecology

4.7.2.2 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.7.2.3 Both proposed options for the freight management facility areas are in close proximity to Stour and Orwell Estuaries SPA and Ramsar site and Orwell Estuary SSSI; we therefore advise that further hydrological assessment is required to

enable informed decisions to be made and ensure that adverse effects do not occur, contrary to the conclusions in Tables 10.3.1, 10.3.2 and 10.3.3 within the PEI (**Vol 2B**, pp. 533 – 535).

Protected species

4.7.2.4 We note that desk assessments only have been undertaken for this aspect of the project proposals to date. We are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

Wider ecology

4.7.2.5 We advise that these aspects of the proposals present opportunities for biodiversity creation through the planting up of landscaped areas with native species (9-10 hectares in area). However, we note that the intention here is to return the site to greenfield when no longer required (**Vol 1**, para 2.9.2, pg. 34); this should therefore be taken into account when considering these aspects in terms of potential environmental net gain when assessed against the current baseline value of the site options.

4.7.2.6 Furthermore, Option 2 (Innocence Farm site) is within a land parcel which forms part of an HLS agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.7.2.7 We advise that this component of the proposals is outside the AONB with Options 1 and 2 being 670 metres and 400 metres respectively from the designated area at their closest point. This could potentially give rise to 'settings' issues. We note that the PEI does not anticipate any significant impact on the AONB and we agree that this is probably the case. However, we cannot be definitive on this point and recommend that the LVIA seeks to confirm the PEI's assertion and that the local planning authority's advice on other landscape and visual impacts is sought.

4.7.3 **Upgrades and improvements along the Saxmundham-Leiston branch line and on the East Suffolk Line, including some upgrades to level crossings**

Impacts on ecology

4.7.3.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.7.3.2 With regards to alterations to rail crossings or rights of way, it should be ensured these would not impact on any designated site through changes in access which may increase recreational pressure to designated sites. It should also be ensured that such closures would not impede the management practices required for conservation of any designated site, such as access for grazing etc.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.7.3.3 We advise that this component of the proposals is well outside the AONB. However, the local planning authority's advice on landscape and visual impacts should be sought.

4.8 **Comments on the individual elements of the project as proposed under the rail-led strategy only**

4.8.1 **'Green rail route' for delivery of construction materials directly to the main development site**

Impacts on ecology

4.8.1.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.8.1.2 As we have already highlighted with regards to the proposed temporary SSSI land take (see para 4.5.7 above), the consultation documents indicate that some additional temporary SSSI land take is needed in order to facilitate the green rail route "*to provide a reasonably flat platform between the green rail route and surrounding uses, including the site access road and common user facilities*" (**Vol 1**, para 7.5.121, pg. 231). We advise that further clarification is required on this issue to confirm the detail of the proposals, the extent of this additional temporary land take, impact assessment for the SSSI habitats and species which will be affected (including any necessary mitigation measures) and the plans to restore these areas upon completion of the temporary works.

4.8.1.3 It is also acknowledged within the consultation documents that "*The majority of the green rail route is located within the Leiston Beck catchment…A series of ditches cross the site, which in turn feed the upper reaches of the Leiston Beck"* (**Vol 2A**, para 3.11.2, pg. 211). The north eastern site boundary of the green rail route development abuts Leiston Beck which flows into Sizewell Marshes SSSI. Though the SSSI is approximately 350 metres to the east of the green rail route site, it is within the SSSI's hydrological catchment (Ground and Surface water) and is sited over freely draining soils prone to leaching and erosion. Though on its own this aspect of the development appears to be fairly low risk to the SSSI in terms of hydrological impacts, it further compounds risks to the hydrological integrity of Sizewell Marshes SSSI when coupled with the other developmental impacts from the proposed development. We advise that further hydrological assessment is therefore required in order to fully assess these risks and ensure that adverse effects do not occur.

Protected species

4.8.1.4 We are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

4.8.1.5 We advise that further consideration should be given to potential fragmentation of the bat population should the railway line construction result in the severance of commuting routes. Further surveys should therefore be designed to assess how bat flight lines may be impacted by the proposals. We agree that safe crossing points to facilitate the passage of bats across the line should be incorporated if key

foraging or commuting routes are identified. This should be taken into consideration if the option to construct a footbridge at Bucklesham Road is chosen; furthermore, we advise that there may be scope to design a 'green bridge'. The consultation documents state that bat activity surveys for the green rail route does not suggest that the habitat within the green rail route corridor is of critical importance for foraging bats using the identified roosts (despite the loss of up to 16 trees with the potential to support roosting bats) and that abundant similar habitats are present within the local vicinity (**Vol 2A**, paras 3.3.12 and 3.3.14, pg. 169 and para 3.3.22, pg. 170). Without seeing surveys we are unable to comment on the potential loss of connectivity for commuting bats. In principle, we welcome the proposed creation of a 3 m earthwork bund which would act as a screen to minimise light disturbance (**Vol 2A**, para 3.3.17 and 3.3.14, pg. 170). [redacted]. It is also stated that soft landscaping would be maintained for the lifetime of the green rail route before being removed when the agricultural use is reinstated. We advise that it is unclear what would be removed in this case and that any such works will need to consider the impact at the time; the removal of the bund may affect bat flight lines if they had previously been using it as a flight corridor.

4.8.1.6 We note from the consultation documents that "*Overall, great crested newts are likely to experience a significant adverse effect at the local level from the combination of habitat loss, habitat severance, and incidental mortality*" (**Vol 2A**, para 3.3.21, pg. 170) and that "*Railway ballast provides potentially suitable hibernating habitat for great crested newts and removal of this ballast could lead to incidental mortality of this species*" (**Vol 2A**, para 3.3.25, pp. 170-171). Natural England will need to see the relevant surveys and licencing proposals in order to comment further. GCN district licensing is not currently available in Suffolk. However, there may be scope to register the site in future, dependent upon time scales of the project and the results of Spatial Distribution Modelling for GCN in the county.

Wider ecology

4.8.1.7 We advise that the green rail route presents good opportunities for biodiversity creation through the planting up of landscaped areas with native species. However, it is not clear from the documents whether or not this aspect of the proposals would be retained in the long-term; this should therefore be confirmed and taken into account when considering this aspect in terms of potential environmental net gain when assessed against the current baseline value of the site.

<u>Impacts on landscape</u>

Suffolk Coast & Heaths AONB and wider landscapes

4.8.1.8 This component of the proposals is presented as being outside the AONB and as not affecting the designated area. If that is correct then the local planning authority's advice on landscape and visual impacts should be sought. What is not clear is how the rail link relates to the AONB in terms of taking materials onto the development site within the AONB. Our assumption is that those materials would be taken from the railhead into the AONB by lorry. Clarification on this point would therefore be welcome.

4.8.2 **Upgrades and improvements along the Saxmundham-Leiston branch line and on the East Suffolk Line, including some closures and upgrades to level crossings which will also include some rights of way diversions**

Impacts on ecology

4.8.2.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.8.2.2 With regards to alterations to rail crossings or rights of way, it should be ensured these would not impact on any designated site through changes in access which may increase recreational pressure to designated sites. It should also be ensured that such closures would not impede the management practices required for conservation of any designated site, such as access for grazing etc.

Protected species

4.8.2.3 We note from the consultation documents that the linear vegetation adjacent to the railway line and the surrounding hedgerows could be of value to foraging and commuting bats, that mature trees could also be of value to roosting bats and that, to inform the development of appropriate mitigation measures and complete the ES, an extended Phase 1 habitat survey will be undertaken to clarify whether significant adverse effects are likely (**Vol 2A**, para 4.6.10, pg. 245 and paras 4.6.34-4.6.35, pg. 248). We welcome this and are unable to comment in detail until we have reviewed the bat surveys (and any other protected species surveys) and the mitigation proposed for any identified impacts.

Impacts on landscape

Suffolk Coast & Heaths AONB and wider landscapes

4.8.2.4 We advise that this component of the proposals is well outside the AONB. However, the local planning authority's advice on landscape and visual impacts should be sought

4.8.3 **Theberton bypass**

Impacts on ecology

4.8.3.1 See section 4.5 above for our advice on the general ecological considerations for the project as a whole, some or all of which may be applicable to this aspect of the proposals.

Designated sites

4.8.3.2 We advise that a 'main river' runs through Theberton which flows into Minsmere – Walberswick Heaths & Marshes (SAC, SPA, Ramsar site and SSSI), and so the same risks as indicated for the preferred SLR option apply, though on a smaller scale (see our advice under section 4.7.1 above for further details).

4.8.3.3 Due to the highly sensitive nature and protections afforded to the Minsmere – Walberswick Heaths & Marshes nature reserves, at the very least comprehensive surface water and drainage strategies are key to this aspect of the proposal and further hydrological assessment is required to enable informed decisions to be made.

Protected species

4.8.3.4 Where possible the use of lighting should be avoided to maintain a 'dark sky'. Where it is considered necessary to relocate water voles by displacement, during the creation of crossing points at water courses, sufficient adjacent habit of suitable quality must be available or created in advance of the works. Please note that this activity will require a licence from Natural England. We consider that the principles of the mitigation and compensation are broadly acceptable. However we are unable to provide further comment until full surveys for protected species are carried out and mitigation/compensation proposals provided for any identified impacts.

Wider ecology

4.8.3.5 We note from the consultation documents that, if progressed, the road would be approximately 2.5 km in length with 2.5 metres wide verges (**Vol 1**, para 2.6.2, pg. 30); we advise that this presents excellent opportunities for biodiversity creation through the planting up of verges with native species, particularly given that the intention is to retain the road as a lasting legacy of the project following completion of the power station (**Vol 1**, para 2.6.3, pg. 30). This should be considered in terms of potential environmental net gain when assessed against the current baseline value of the site.

4.8.3.6 We advise that the Theberton bypass as proposed contains land parcels which form part of an HLS agri-environment scheme which delivers benefits for wildlife. Consideration must therefore be given to any impacts on the scheme and implications for the agreement holder.

<u>Impacts on landscape</u>

Suffolk Coast & Heaths AONB

4.8.3.7 All of the route options lie outside the AONB but within its setting. The consultation does not anticipate any significant impacts on the designated area but we expect that the LVIA will determine whether this is actually the case. We cannot therefore comment at this time but will engage with the consultants carrying out LVIA if mitigation measures relating to the AONB are required.

Network Rail Ltd
Sizewell C Proposed Nuclear Development
Stage 3 Development Consent Order Pre-Application s42 Consultation Response

March 2019

Network Rail recognises the scale of the potential opportunity for rail freight that the Sizewell C construction project represents. We are keen to work closely with EDF Energy to understand their material supply needs and promote an economically and operationally robust rail-led offer. A rail-led or rail supported solution would offer environmental benefits to local communities through the mitigation of Heavy Goods Vehicle (HGVs) movements on local roads and could deliver enduring legacy rail network benefits for future passenger and freight services.

Background

EDF Energy previously commissioned Network Rail to undertake bespoke development work to look at the high-level rail scheme feasibility. This study considered traffic being routed to the south via Ipswich.

Early findings at GRIP 1-2 have shown the need for a number of tactical interventions to the immediate local rail network to enable such volumes of traffic and deliver the capability needed to fully exploit optimised rail operations with heavy axle weight, full length material supply trains.

It identified high level options for road-led rail supporting 2ftpd overnight from 2022-24 followed by a rail-led road supported 5ftpd daytime solution from 2025-2032 at the earliest. This proposed timescale accounts for the consultation and submission of a separate Transport and Works Act Order (TWAO) to separately address the closure of 12 and changes to 33 level crossing as consulted upon in this stage of the consultation. This would be submitted outside of the Development Consent Order (DCO).

Capacity

The Freight and National Passenger Operators team at Network Rail encompasses long-term planning and freight operator & user interests nationwide. This year (2019) sees the conclusion of the Felixstowe branch line upgrade; works that unlock a tranche of additional rail capacity to address frustrated container traffic to/from the Port of Felixstowe.

Since the initial development work was undertaken on the Sizewell scheme we now have a clearer understanding as to the utilisation of the capacity that the Felixstowe works create. Notably, this impacts on a southerly routing of Sizewell related traffics - the imminent increase in Port intermodal traffic will in large part consume the capacity previously assumed for potential Sizewell traffics.

Network Rail therefore recommend that in-order to fully understand the capacity implications it will be necessary to commission a full capacity and timetable study within the next stage of work required (GRIP 3-4). This will look at all potential capacity options of all operationally plausible routings.

This will be progressed as a priority if undertaken by the client, such further detailed development work will be based on set assumptions until there is more certainty on the point of origin for materials and where spoil will be deposited.

Timings

As noted in the consultation documents Network Rail has identified a number of risks to the rail-led solution that could potentially impact the programme in terms of the submission date for the DCO. Therefore, EDF and Network Rail recognise that this could affect their decision as to which strategy to pursue. We continue to work closely with EDF to understand the necessary timescales and impact on the programme.

The DCO

In addition to the points raised above, for all TWAOs and DCOs Network Rail have standard protective provisions which may need to be included in the DCO as a minimum. A number of legal and commercial agreements may need to be entered into, for example, asset protections agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. Please be aware that any land transfer, easement etc will need to go through Network Rail's clearance process and other rail industry processes. This list is not exhaustive and will need to be kept under review as we continue to work together on this scheme.

As highlighted above the scheme has the potential to impact on the usage and condition of a number of Network Rail level crossings. The Parties will need to continue to discuss the potential impacts of the proposed scheme on the level crossings. In addition, consideration will need to be given to the potential increase in usage of the crossings as a result of staff and construction vehicles. Further, the potential impact of large / heavy construction vehicles on the condition of the crossings and its associated equipment will need to be assessed. Mitigation measures may be required to address any adverse impact on the level crossings.

Conclusion

Network Rail has been working closely with EDF for a number of years on this scheme and we have both identified that Sizewell C is a significant rail traffic opportunity that must not be missed. We want to build on our existing relationship to work alongside EDF to describe an effective rail solution that integrates with the burgeoning traffic base of this area. This will require as described, additional work to support a robust timetable offer.

From: [redacted]
To: SizewellC
Cc: [redacted]
Subject: Sizewell C - Comments
Date: 06 June 2019 08:55:59

FAO Planning Inspectorate

Further to your letter dated 23 May concerning information to be included in any Environmental Statement (ES), Norfolk County Council has the following comments.

While the proposed development is located outside of Norfolk within the neighbouring County of Suffolk, and is unlikely to have any immediate impacts on Norfolk in terms of landscape, ecology and archaeological matters, it is felt that the following issues should be considered and addressed in the Environmental Statement (ES) supporting the DCO application:

a. **Employment and Training**

It is understood from the Preliminary Environmental Information Report (PEIR) that during construction there will an on-site workforce of around 5,600 (Section 4 – Consultation Summary Document January 2019), although only 2,000 are projected to be home-based with the remainder coming in from outside local/regional area. Section 4 also indicates that the project will create 25,000 job roles during construction and 900 – 1,000 people to operate the power station once completed.

While Norfolk County Council welcomes the employment opportunities the Power Station will have within the local/regional area both during construction and once operational, there are significant economic issues, which the proposal (ES) will need to address with regard to:

a. The potential impact on the local labour market – will the development lead to shortages of construction and other key skilled workers in other location in East Anglia; and
b. What measures will be taken to mitigate any potential impacts;
c. What support and investment will be given to the training in the local area (e.g. covering the construction sectors). Norfolk County Council would especially welcome measures that will enable permanent, long term job opportunities to be taken up by local people; and
d. In addition the County Council would support measures that would encourage/enable people currently excluded from the formal labour market to be supported into jobs at any level/degree of permanency which could help to ease competition for people already active in the relevant local labour market.

The County Council recognises that the applicant (EDF Energy) are:

1. Working with the Suffolk Chamber of Commerce on Supply Chain matters; and
2. Developing a Education; Skills and Employment Strategy which will form part

of the DCO application.

While welcoming the above commitments by EDF Energy, it is felt that given the proposal's proximity to Norfolk and the likelihood of additional major construction projects in both Norfolk and Suffolk arising from the offshore wind energy sector (i.e. associated with the Hornsea Three Project; Norfolk Vanguard and Boreas; and East Anglia Offshore Wind One (North) and Two) there is a need for:

a. Wider consideration of supply chain issues to include working with neighbouring authorities particularly Norfolk; and
b. Ensuring that any Education, Skills and Employment Strategy addresses/considers the wider cumulative impacts arising from other planned NSIPs in the area (i.e. covering the above offshore projects); and
c. In addition there needs to clear evidence that the significant construction workforce needed will not adversely affect the delivery of other key sectors such as local house building and other employment sectors to the detriment of the local housing and business markets.

The Environmental Statement will need to address the above employment and training matters.

b. **Transmission network – grid connection comments**

There are potentially wider grid connection issues in respect of the 400kV network which runs between Norfolk and Suffolk. The Stage 2 Report (Autumn/Winter 2016) indicated that electricity from Sizewell C will be stepped up to 400 kV through on-site transformers and connected via underground cables to a new National Grid 400 kV sub-station. The PEIR has suggested that no additional overhead line circuits should be required for Sizewell C in the "vicinity" of the site. It is understood that further studies will be completed to confirm the details of the revised overhead line connection.

It is considered that as part of any the DCO application and accompanying Environmental Statement there needs to be clarification on whether there is likely to be any requirement in the wider area for either: (a) reinforcement; of the existing 400 kV network; or (b) new overhead lines (400kV).

Given the amount of electricity coming ashore from offshore wind energy projects off the Norfolk and Suffolk Coast, the DCO application and accompanying ES will need to address the in-combination impact on the 400 kV transmission network in the wider strategic area i.e. including the potential for reinforcement and new lines in both Norfolk and Suffolk.

These cross-boundary electricity transmission issues were raised by the County Council at both the Stage 1 consultation in 2013 and the Stage 2 consultation in January 2017 and again more recently as part of the Stage 3 S42 PEIR consultation (Early 2019).

As such the County Council would like to see further evidence and studies (through the ES) setting out the full implications of both the Sizewell C and the emerging offshore wind energy projects on the existing 400 kV network across the

two Counties.

Should you have any queries with the above matters please call or email me.

Kind regards

Stephen

Stephen Faulkner MRTPI
Principal Planner
Community and Environmental Services
Telephone: 01603 222752

--

To see our email disclaimer click here http://www.norfolk.gov.uk/emaildisclaimer

T: 0345 604 7468
nwl.co.uk

Northumbrian Water Limited
Leat House
Pattinson Road
Washington
Tyne and Wear
NE38 8LB

Direct Line: 0191 419 6776
E-mail: [redacted]
Your Ref: EN010012-000670

20th June 2019

FAO: Ms Gail Boyle

Dear Ms Boyle,

Subject: Sizewell C Nuclear Power Station Application EIA Scoping Opinion

Thank you for consulting Northumbrian Water Limited on the above proposed development in our Essex & Suffolk Water operating area.

In making our response to the Planning Inspectorate we will assess the impact of the proposed development on our assets and assess the capacity within Essex & Suffolk Water's network to meet the required water supply for the development. We do not offer comment on aspects of planning applications that are outside of our area of control.

We have read the Environmental Impact Assessment (EIA) Scoping Report and note the proposed development will deliver a new nuclear power station and on-site associated facilities and other permanent and temporary off-site associated development necessary including but not restricted to:

- Power station platform i.e. the area that would become the power station itself
- Sizewell B relocated facilities land i.e. the area that certain Sizewell B facilities would be moved to in order to release other land for the proposed development
- Temporary construction area i.e. the area located primarily to the north and west and the SSSI crossing which would be used to support construction activity on the main platform and
- Land east of Eastlands Industrial Estate (LEEIE) i.e. the area directly north of Sizewell Halt which would be used to support construction on the main platform and temporary construction area

We note that a number of features proposed in 2014 have been removed and others have been identified in this revised 2019 Scoping Opinion. We also note that the construction programme is anticipated to last 9 -12 years undertaken in 5 key phases.

Our primary concerns are around safeguarding the deployable output and groundwater quality of our groundwater sources. We note correspondence from the EA dated 22 May 2014 which clearly sets out the situation regarding limited water supply in Eastern England and the

requirement to carefully identify supply need for construction and operational phases as well as for potable consumption by on-site workers.

We are already working with EDF regarding a potable water supply to the Sizewell C site. Our current position is that we currently can not supply Sizewell C with a potable water supply. However, we will review this situation in Autumn 2019 once our abstraction sustainability investigations have been completed and approved by the Environment Agency. Should these investigations conclude that we can not supply the construction and operational phases of the development, then we have agreed with EDF that we will work with them to find an alternative sustainable supply.

We welcome the SoS recommendation set out at 3.156 to include an additional chapter entitled Utilities and Infrastructure Assets which should assess any potential impacts of the proposed development on other utility receptors / infrastructure assets including gas and water pipelines, electrical cables, sewer network, potable water supply and railway network.

Specifically from our perspective, we would expect the following activities to be covered in the EIA:

- Non-Potable Water Supply abstraction for construction activities (excluding de-watering);
- Groundwater dewatering;
- Sheet piling; and
- Construction of the concrete curtain; and
- Any other activity that could affect groundwater and surface water levels and water quality.

The EIA should therefore consider the effect of the above activities on:

- The overall conservation status (condition assessment) of designated conservation sites; and
- The WFD status of all water bodies covering the four test areas (including groundwater and surface water quality (including but not limited to salinity) and groundwater levels and groundwater discharge to wetland dependant features within all effected designated conservation sites).

We note in sections 7.11 and 7.12 respectively that Groundwater and Surface Water will be assessed.

Section 7.11 identifies that groundwater conditions are currently being assessed in order to assess significance of impact and effect on the groundwater environment and on environmentally sensitive areas such as the Sizewell Marshes SSSI. We note that the model being used for assessment has been developed in discussion with the EA. We understand that environmental assessment will consider the impacts and effects of the proposed development site construction and operation phases on the following water resources and receptors:

- Secondary A Superficial Aquifers
- Principal Crag Aquifer
- Surface Water bodies, fed in part, by groundwater
- Private and EA Licenced groundwater abstractions
- Minsmere-Walberswick Heaths and Marshes SSSI and Sizewell Marshes SSSI

T: 0345 604 7468
nwl.co.uk

Northumbrian Water Limited
Leat House
Pattinson Road
Washington
Tyne and Wear
NE38 8LB

Section 7.12 identifies that surface water conditions will be assessed including watercourses and standing water bodies in and around the development area. We understand that a Flood Risk Assessment will also be undertaken to support assessment of surface water.

The applicants are welcome to consult directly with Essex & Suffolk Water regarding the above comments that have been made.

We request to be kept informed as the Development Consent Order progresses through the system and to have opportunity for further consultation.

Yours Sincerely

Katherine Dobson
Planning Team Leader
Developer Services

cc. William Robinson, Water Resources Manager
Malcolm Huggins, Strategic Network Regional Manager

Office for Nuclear Regulation

Gail Boyle
EIA & Land Rights Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Mr Craig Lavender
Head of EPR Sub Division
New Reactors Division
Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

Telephone: 020 3028 0078
Email: [redacted]

Your Ref: EN010012-000670
Our Ref: SZC50374N
2019/175025

Date: 18 June 2019

Dear Ms Boyle

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Application by EDF Energy for an Order granting Development Consent for the Sizewell C Nuclear Power Station

Thank you for your letter of 23rd May 2019 seeking views on the EIA Scoping Report submitted by EdF Energy in respect of a proposed nuclear power station at Sizewell C.

Environmental Impact Assessments are concerned with projects that are likely to have significant effects on the environment. The Office for Nuclear Regulation's purposes are safety and security on nuclear sites in Great Britain, and the transport of radioactive materials in the UK. In broad terms, therefore, ONR cannot usefully comment on the information provided in Environmental Statements, nor the content of EIA Scoping Reports.

However, we have reviewed the accuracy of those parts of the EdF Energy Scoping Report that describe the regulatory regime enforced by ONR and our role in relation to the regulation of new nuclear power stations. With regard to these matters, I can confirm that ONR has no comments to make.

Yours faithfully

[redacted]

Craig Lavender
Superintending Inspector

From:	[redacted]
To:	SizewellC
Cc:	info@teags.org; [redacted]
Subject:	Impact on Pettistree of Sizewell C Development
Date:	19 June 2019 17:02:56

FAO. Gail Boyle
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Impact on Pettistree of Sizewell C Development

I am replying as Chairman off Pettistree Parish Council to your communication of 23rd May 2019 about the Sizewell C EIA Scoping report.

1. Despite attending explanatory sessions with EDF and with Planning. Aid England I had not heard of the concept of Scoping Reports in connection with the Environmental Assessment of the impacts of Sizewell C developments. I was therefore disappointed that more basic explanation had not been given and such a short deadline (tomorrow) had been given for responses to this new intervention by EDF.

2. I did not attempt to read the whole of the indigestible Scoping Report of more than 900 pages but I did scan it electronically for any comments of direct relevance to Pettistree and our surrounding villages. In particular there is only the most cursory mention of the effects of the need to bypass part of the B1438 in Wickham Market. (3.6.15 to 3.6.18). There was no mention of an environmental assessment of the changes proposed to the Valley Farm lane (apart from maintaining roadside vegetation) and the listed narrow weak bridge over the River Deben. We have explained previously in responses to EDF that we do not think this route is a viable option anyway, and like Wickham Market have suggested that rather than using the Valley Farm Lane turn off it will be better to use a new turning at the Potsford Farm entry and then across farmland and a new crossing over the River Deben to connect with Easton Road. Obviously an environmental assessment is also needed of this new proposed route. Failure of whatever scheme is put in place to avoid congestion in Wickham Market is going to lead to “rat runs” by cars, vans and non-Sizewell lorries, with intolerable congestion in the narrow lanes of Pettistree where there are no footways.

3. It is illogical to issue a scoping report when there has been no response by EDF to the mass of comments received on their proposals. It seems obvious that a further environmental report will be needed on any changes that will affect the environment.

4. The congestion in Wickham Market will be caused by the need for the construction workers to obtain access to the nearby Park and Ride facility. Pettistree relies on Wickham Market shops and businesses for its everyday needs including access to the school. I could find no assessment of the impact of congestion caused by workers starting and finishing work shifts on the availability of resources to surrounding villages.

5. Lighting is mentioned in general terms in 6.6.19 but the specific problem of loss of star visibility due to light pollution is not discussed. This is likely to be an effect seen in Wickham Market and the surrounding villages, including Pettistree, because of the constant lighting need at the Park and Ride site. This will of course go on for the 10 years of construction unless the lighting is very well designed.

I hope the these comments will be helpful and they they will illustrate the far reaching environmental effects of the Sizewell C proposals on even a small and relatively distant village community.

I have this minute received notice of the next EDF Sizewell C Community Forum on 3rd July. There is no mention that the Scoping Report will be explained or discussed. I shall await the actual agenda with interest.

Yours sincerely

Jeffrey Hallett

Mr Jeffrey Hallett
Chairman, Pettistree Parish Council.
The Laurels, PETTISTREE,
Woodbridge, Suffolk, IP13 0HU.
01728 746210
suffolkhorse@compuserve.com

Public Health England

Environmental Hazards and Emergencies Department
Centre for Radiation, Chemical and Environmental Hazards (CRCE)
Seaton House
City Link
London Road
Nottingham NG2 4LA

nsipconsultations@phe.gov.uk

www.gov.uk/phe

Your Ref: EN010012-000670

Our Ref: 50283

Ms Gail Boyle
EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

20th June 2019

Dear Ms Boyle

Nationally Significant Infrastructure Project
Scoping consultation: Sizewell C Proposed Nuclear Development

Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals and Scoping Report at this stage of the Nationally Significant Infrastructure Project (NSIP).

Please note that we have replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence:

Stage 1 Consultation:	7th January 2013
Request for Scoping Opinion:	22nd May 2014
Stage 2 Pre-application consultation:	31st January 2017
Section 42 consultation:	28th March 2019

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to NSIP applications.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global

ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from, for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Environmental Public Health

We have assessed the submitted documentation and wish to make the following comments:

1. We are generally satisfied with the proposed methodology. We would expect to see that the detailed quantitative and cumulative assessments proposed are undertaken and provided in the final Environmental Statement (ES).

2. Our position is that pollutants associated with road traffic, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

3. We look forward to reviewing the radiological impact assessment of discharges of radionuclides into the environment. The applicant should note that this radiological impact assessment will need to take account of the likely combined impact of historical, current and prospective discharges and direct radiation from all relevant sites on humans and non-human biota as part of the permit application for radioactive substance activities. The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation. It is also important that the developer addresses the radiological impact associated with the decommissioning of the site and takes into consideration the Environment Agency's (EA) guidance document 'Management of radioactive waste from the decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation'.

4. We note the process for considering the radiological impact of major accidents and disasters is a new requirement since the 2014 EIA scoping report. For the radiological impact, in addition to the impacts in terms of evacuation and sheltering, the requirements for provision of stable iodine should be summarised in the impact assessment. The outputs should include the estimation of doses for the impacts considered and be presented in the EIA.

Health and Wellbeing

PHE welcomes the developer engagement with the local public health and health care system and the opportunity this presents to protect and promote local health and wellbeing. Specifically, we welcome the intention to address potential health issues and opportunities in consultation with key health stakeholders including Public Health Suffolk, Suffolk County Council (SCC), Suffolk Coastal District Council (SCDC), the National Health Service (NHS) and the East of England Ambulance Service. We note the changes to the scoping report since the 2014 consultation.

This section of PHE's scoping response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Methodology

Health Impact Assessment

The intention to have an integrated assessment rather than a standalone Health Impact Assessment (HIA) raises concerns and risks a lack of clarity and attention to population and human health.

Any integrated assessment must ensure that the chapter relevant to human health is sufficiently comprehensive and not significantly reliant on cross referencing to multiple other chapters.

PHE will expect the Preliminary Environmental Information Report (PEIR) and ES to set out the methodology used to assess impacts on each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical health impact assessment method that:

- identifies affected populations vulnerable to impacts from the relevant determinant
- establishes the current baseline situation using the most current available data
- identifies the NSIP's potential direct and indirect impacts on each population
- if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population
- identifies appropriate mitigation to minimise impacts or the subsequent effects on health
- identifies opportunities to achieve benefits from the scheme
- identifies the evidence base on which the impact assessment is based
- identifies appropriate monitoring programmes

Population and human health

The scoping report does not identify any aspects to be scoped out of the assessment for population and human health for the main site. The list of wider determinants to be scoped

into the ES, by the applicant, are very broad descriptions and each will contain an important range of potential impacts on health and wellbeing.

Table 1 lists the wider determinants, as a minimum, that should be scoped into an assessment of effects on population and human health under the broad descriptions identified within the scoping report.

Table 1 – Health and wellbeing wider determinants

Health and wellbeing themes			
Access	**Traffic and Transport**	**Socioeconomic**	**Land Use**
Wider determinants of health and wellbeing			
- Access to local public and key services and facilities - Access to good-| quality affordable housing - Access to healthy affordable food - Access to the natural environment - Access to the natural environment within the urban environment - Access to leisure, recreation and physical activity opportunities within the urban and natural environments	- Accessibility - Access to/by public transport - Opportunities for/access by cycling and walking - Links between communities - Community severance - Connections to jobs - Connections to services, facilities and leisure opportunities	- Employment opportunities including training opportunities - Local business activity - Regeneration - Tourism and leisure industries - Community/social cohesion and access to social networks - Community engagement	- Land use in urban and/or rural settings - Quality of urban and natural environments

Should the applicant wish to scope out any of these determinants the PEIR must provide adequate justification in accordance with the Planning Inspectorate Advice Note Seven (Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements).

Vulnerable populations

An approach to the identification of vulnerable populations has not been provided and does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The ES and any EqIA should not be completely separated.

Recommendation

The PEIR and ES should clearly identify the vulnerable populations that are being scoped into or out of any assessment and provide clear justification.

The assessments and findings of the ES and any EqIA should be crossed reference between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.

Temporal scope and reporting

The scale and nature of the proposed development results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context “temporary” impacts can extend over long periods. The scoping report does not identify how short term effects will be segmented to more accurately reflect temporal effects.

Recommendation
The reporting within the PEIR or ES should use the consistent definitions rather than generic temporary or permanent temporal descriptions to ensure a consistent, transparent and accurate approach to the report.

In combination & Cumulative effects reporting

The local community will experience impacts from a range of factors due to this and other local developments over an extended period. The range of impacts over such a long period may result in minor effects gaining increased significance to local communities and the vulnerable populations within.

Recommendation
The PEIR should report effects at community level in order to assist the identification the overall potential effects across a range of impacts. These community level reports will also aid local communities to engage with consultations by providing relevant and accessible information.

The scoping report covers a number of significant programmes of work necessary to deliver the overall project. Although intra-related cumulative impacts are considered on a geographic basis it would be useful for an overall timeline of events to demonstrate any temporal in combination impacts across the zone of influence. This will also aid identification of cumulative impacts should individual project timelines be extended.

The ES should include an overall timeline of activity to allow for temporal as well as geographic assessment of impact.

Mental Health

It is important that mental health and wellbeing is included within the HIA or population and human health assessment within the EIA. The previous third stage consultation of the draft PEIR included references to the assessment of effects on mental health of the local community and workforce.

Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

Monitoring of direct and indirect impacts or effects on health will also be important and can provide a detection system for the need for early interventions.

Recommendation
There should be parity between mental and physical health in the HIA, including suicide.

Workforce Accommodation / Campus

PHE welcomes the proposal to produce an accommodation strategy and that the assessment of accommodation demand now includes an additional higher demand profile for planning assumptions.

We note that some temporary worker accommodation (campus and caravans) will be used to accommodate a proportion of the work force in order to reduce the impact on local communities, but specific details of the accommodation and campus design are not considered. The built and natural environment is a key environmental determinant of health and wellbeing. Given the scale and duration of the scheme the design and operation of the temporary worker accommodation can have an effect on the health and wellbeing of the workforce. The final ES should consider the potential impacts of the design features of the accommodation and campus infrastructure that can affect health and wellbeing.

We welcome the occupational and wellbeing facilitates and services to be provided but would expect that both accommodation and catering services provide opportunities for a healthy diet. This is currently not mentioned within the PEIR.

The accommodation demand profile for non-home based workers for both demand curves is useful, but lacks clarity on how this demand is to be met across the life of the project. The phasing of appropriate available accommodation provision must match the demand planning assumptions.

Recommendation
The draft accommodation strategy should form part of the ES to ensure it is considered as part of the assessment of mitigation measures.

The ES should include sufficient details of the temporary accommodation and campus design to ensure that an assessment is possible of the design features that can influence mental and physical health and wellbeing outcomes; for example, through physical activity levels, travel patterns, social connectivity and access to green space.
Any temporary accommodation will need to provide suitable and sufficient facilities for the storage and cooking of healthy meals. On site food outlets should cater for the provision of healthy food options.

The existing accommodation strategy identifies a proposed registration scheme for the providers of private rented sector accommodation. The strategy should outline measures to ensure that accommodation in the tourist or private rented sector is fit for human habitation, particularly for houses in multiple occupation (HMOs). This could be through advice to property owners on their responsibilities and legal duties, advice to tenants or an approval scheme.

The final ES and accommodation strategy should outline how the planned accommodation profile will match the demand profile for non-home based workers under both workforce profiles.

Physical Activity / Active Travel

The provision and proximity of good quality accessible active travel infrastructure and open space that promotes physical activity is a key element in the promotion of a healthy weight environment, which can have positive behavioural and health outcomes, such as mobility, social connectedness, mental health and cardiovascular outcomes.

PHE welcomes the proposals to create a Construction Worker Travel Plan. This travel plan provides an opportunity to promote active travel and also reduce vehicle usage, both on and off site. The promotion of active travel should be accompanied by an on site built and natural environment design that facilitates active travel and physical activity.

The scoping report identifies a number of Public Right of Way (PRoW) and footpaths that will be redirected and in some cases the need for installation of bridges and crossings. It is important to ensure access to green space and opportunities for physical activity are available and accessible to individuals across the life course.

Recommendation
The draft Construction Worker Travel Plan should be included within the final Environmental Statement.

The report identifies a number of PRoW, footpaths and cycle routes that will be effected for the construction and operation phase under both the rail and road option. These impacts must have mitigation measures identified that maintains as far as possible access to the local population across the life course and minimises any perceived barriers to use. In particular, bridges may be a perceived or actual barrier and as such they should be designed to remain accessible.

The on site infrastructure, buildings and facilities should be designed to promote active travel and physical activity. The built and natural environment should be designed to follow guidance issued by the National Institute for Health and Care Excellence (NICE) on the design of the environment for physical activity (Physical activity and the environment - NICE guideline [NG90 -March 2018]) and Sport England Active by Design

Monitoring

The scoping reports identifies the intention to identify the need for monitoring (para 6.22.3). PHE expects an assessment to identify the principles used to determine the need to monitor and subsequently the details of any monitoring strategy.

It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur.

- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur

Any monitoring strategy should clearly identify who is responsible for the production of the data, quality assurance/standards, frequency and data sharing arrangements

If you require any clarification on the above points or wish to discuss any particular issues please do not hesitate to contact us.

Yours sincerely

On behalf of Public Health England

nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Response by Saxmundham Town Council to the Sizewell C EIA Scoping Report June 19th 2019

Introduction

This document has been produced in response to an email of the 23rd of May received by the Town Council from the Planning Inspectorate It is not intended to be a full response to the scoping document which is approximately 300 pages in length (900 with annexes) and which will require a considerable amount of resource to fully assimilate. Given that the newly-elected town council has only been in place since mid-May and initially only comprised four councillors, it has not been feasible to properly evaluate the document and the council hopes that other parties have been able to do this in more detail.

Saxmundham Town Council does not have a view on the suitability of nuclear power as a sustainable source of energy to supply the future needs of the country. However, it does have the right to comment on the suitability of proposed plans for the building and operation of any new facility of this type which will have a potential impact on the residents of the town. In this regard, it would like to make the following comments regarding the timing of the production of this report:

Timing

In our view, EDF's request for a Scoping Opinion at this time is premature and wrongly conceived. It comes very soon after the close of the (flawed) Stage 3 consultations, and its proposals to conduct Environmental Impact Assessments appear to be based on the plans presented during those consultations. This indicates that EDF is paying little attention to the many respondents to the Stage 3 consultations, and may be pre-judging the outcome. It gives the impression that it is viewing the entire consultation process as a tick-box exercise.

If the plans submitted by EDF to the Stage 3 consultations subsequently need to be amended in the light of the comments made then it is clear that the scoping opinion will not be valid as EDF will then need to reassess the environmental impact of any changes made to those plans.

The timing of this request for comments is also unfortunate as Local Elections took place on the 2nd of May and, in many cases, councils only held their first meetings towards the end of May.

Other substantive issues

As we made clear in our responses to the stage 2 and 3 consultations, it was highly unsatisfactory that preliminary EIAs had not been undertaken previously and presented to consultees before these consultations were closed as part of the consultation process. As a consequence, we were expected to respond based on incomplete information. Moreover claims were made in the consultation, such as minimal impact on the Minsmere coastal frontage and coastal processes, which were not backed by EIAs.

Response by Saxmundham Town Council to the Sizewell C EIA Scoping Report June 19th 2019

As to other content, given the above circumstances we would wish simply to indicate a number of environment-related issues of concern to us as a town close to the proposed development, and likely to experience economic, social and environmental impacts, which we believe to be relevant to the EIA scoping exercise. Saxmundham functions – with its rail and road links – as a 'gateway' to much of the east Suffolk area, important e.g. for future energy-related enterprise, for tourism and for communications, which all have environmental impacts and consequences.

Water Supply

Saxmundham is situated in one of the driest parts of the country and, with an increasing population, the demands on water resources are already heavy. EDF must be able to demonstrate in their environmental report that they will have access to sufficient supplies of water without damaging the local ecosystems or depriving local communities.

Air Quality

There is already concern in the county about the degradation of air quality and monitoring has shown high levels of Nitrogen Dioxide in some places.. EDF needs to carry out detailed surveys on the proposed access routes to the construction site and come up with realistic projections for the likely levels of Nitrogen Dioxide and Particulate Matter. It also needs to consider ways of alleviating an increase in air pollution by innovative solutions such as use of electric vehicles and the most-modern coaches and lorries.

Traffic

The report must include some expectation of the additional traffic that the town might expect to receive during the construction work. It should include measures to be taken if the A12 Saxmundham bypass has to be closed at any time as it would be unacceptable to re-route construction traffic through the town

Low Carbon Energy

Although Nuclear Power is described as 'low-carbon', it would be valuable to have information on the Carbon Dioxide emissions during the construction, operating and decommissioning phases of the project measured against the likely output from the plant during its working life.

Ecology and biodiversity

The development of Sizewell C will have a major detrimental impact on local ecology and biodiversity. We are for example concerned at the impact at Eastbridge of the proposed workers' campus – this is an area of huge environmental sensitivity.

The combined environmental impact of Sizewell C and the East Suffolk Council Local Plan

We are also concerned at the ecological and broader environmental impact of road traffic generated especially in the construction period, and in particular as this development intersects with the East Suffolk Council Local Plan, which makes Saxmundham a major growth point for the whole area. Yet the Sizewell Consultation failed even to mention the

Local Plan proposals and impact, and this has not (as far as we have seen) been taken into account in the Scoping Report. We have throughout argued for a strong rail-based approach with improved line, and the differential environmental impacts of different road or rail (or combined) construction approaches need to be assessed and compared.

Impact assessments over different timescales

There should be a clearer structure for delineating the short, medium and long term environmental impacts and risks; the EIA should not just assessing the impact of the construction stage and plans, but also the ongoing operations.

From: [redacted]
To: SizewellC
Subject: Sizewell C DCO scoping consultation
Date: 03 June 2019 14:43:22
Attachments: [redacted]
Importance: High

FAO Gail Boyle

Dear Gail,

I refer to the Consultation to South Norfolk Council regarding the Sizewell C DCO Scoping opinion attached (our reference ENQ/2019/0600.)

I can confirm that South Norfolk Council has no comments to make on the Scoping opinion.

Should you have any further queries or wish to discuss please don't hesitate to contact me.

Kind regards,

Tracy

Tracy Lincoln
Team Leader - Major Projects Team
t 01508 533814 e tlincoln@s-norfolk.gov.uk

South Norfolk Council Logo

This email and any attachments are intended for the addressee only and may be confidential. If they come to you in error you must take no action based on them, nor must you copy or show them to anyone. Please advise the sender by replying to this email immediately and then delete the original from your computer. Unless this email relates to Broadland District Council or South Norfolk Council business it will be regarded by the council as personal and will not be authorised by or sent on behalf of the councils. The sender will have sole responsibility for any legal actions or disputes that may arise. We have taken steps to ensure that this email and any attachments are free from known viruses but in keeping with good computing practice, you should ensure they are virus free. Emails sent from and received by members and employees of Broadland District Council and South Norfolk Council may be monitored.

Gail Boyle
Major Casework Directorate
Temple Quay House
2 The Square
BRISTOL
BS1 6PN

Your ref: EN010012-000670
Our ref:
Date: 18 June 2019
Please ask for: Lisa Chandler/Michael Moll
Direct dial: 01394 444538 / 01473 264808
Email: [redacted]

Dear Ms Boyle,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11
Application by EDF Energy (the Applicant) for an Order granting Development Consent for the Sizewell C Nuclear Power Station (the Proposed Development)

Thank you for consulting Suffolk County Council and East Suffolk Council (the Councils) on EDF Energy's request for a Scoping Opinion. The Council's responded to the previous request in 2014 (22 May 2014) and are happy to be given the opportunity to respond at this time.

Please find below the joint response of the Councils to the aforementioned request.

Executive Summary

The approach set out in the Environmental Statement is generally satisfactory and we are pleased that it reflects the nature of, and progress in, discussions the Councils have had with EDF Energy on the undertaking of assessments to date.

However, we draw particular attention to the following matters:

- Further discussions are required with EDF Energy in describing the magnitude of impacts, in particular the spatial extent and duration of effect that are used to derive the corresponding magnitude. As currently described, the ES is likely to underreport localised impacts of significant duration. A better acknowledgement of the longevity of the temporary, but long-term construction period is required.
- We are concerned that alternatives are being scoped out of the process at an early stage, without a full appreciation of the effects of EDF Energy's preferred option. Alternatives should be appraised having regard to the respective socio-economic and environmental effects alongside consideration of operational requirements. The ES should clearly articulate how alternatives have been evaluated in a balanced way.

- The ES should clearly articulate the cumulative effects of all individual elements of the project as many receptors will be impacted by separate developments. This needs to be fully acknowledged.
- The phasing of the construction programme needs to be provided and sensitivity testing in the timing of the delivery of mitigation proposals, such as the Two Village Bypass, accommodation campus, park and rides and rail works undertaken so that they are delivered at the optimum time having regards to the impacts associated with their construction, and their ability to reduce impacts on local communities and the environment.

Some general, introductory comments are made immediately below, followed by some more detailed comments relating to the specific sections in the Scoping Report.

A number of the more general comments are unchanged since our original response in 2014. We note that a very significant amount of assessments in a wide range of areas is still required to be undertaken in advance of submission of the DCO application, most notably with regard to ecological surveys, to inform the level of impact and the need for mitigation and compensation.

1. GENERAL COMMENTS

1.1. Structure of the Environmental Statement

1.1.1. It is proposed that the ES is structured around the main development sites and then the identified associated development sites. We are pleased to see that there has been a move away from topic based subject areas but in doing so the project-wide considerations such as socio-economics and transport and environmental matters may be lost.

1.1.2. The ES should acknowledge the scale and the geographic extent of the development is such that it will have very wide ranging environmental effects over a large area, particularly when one considers:

- The environmental effects of the offsite associated development sites.
- The environmental effects of transport movements, terrestrially and at sea (although it is noted that a Marine Off-Loading Facility is no longer proposed.
- The environmental effects associated with the deflection or displacement of recreational users to wider/alternative areas.

1.1.3. Consequently, we would not wish the environmental impacts to be presented in such a way that the full scale of effects is not readily appreciable. In addition to interactions with other projects or programmes Volume 10 (Cumulative and transboundary assessment) therefore needs to consider the cumulative effect of all the individual elements of the project, particularly where they impact on the same receptor (for example the rail line extension, site entrance works and the campus will all separately impact on Leiston Abbey). It would also, in this vein, be useful for the ES to explain the interrelationship with the Habitats Regulation Assessment.

1.1.4. Conversely, we would not wish the *localised* transport and socio-economic impacts to be underplayed. For example, the campus will have localised impacts by virtue of its proximity to other communities which may be presented in such a way that other socio-economic impacts on the labour market or accommodation availability take dominance.

1.1.5. There is a particular case to consider whether the impacts of the campus development (wrapped in to the 'Main Development Site') need to be specifically isolated within the ES, because of the particular sensitivities, environmentally and socio-economically, associated with EDF Energy's preferred site, and the potential existence of alternative site locations. While the campus offers mitigation in some respects, it will give rise to other impacts of its own making. In particular, the ES should assess the impact on nearby residential properties and mitigation measures included as necessary.

1.2. Magnitude of impacts – Temporary and permanent

1.2.1. The ES should clearly distinguish between temporary impacts and permanent impacts and also be consistent with how the duration of impact relates to significance of effect.

1.2.2. Table 5.2 sets out the generic guidelines for the assessment of magnitude. We are pleased to see that this has been revised since the previous submission as we had found a number of the definitions unhelpful

1.2.3. So, while Table 5.2 is described as generic guidelines it could better reflect the specific circumstances of the project.

1.2.4. Above all, the ES should be consistent on how these terms are used or explain very clearly why any inconsistencies do arise.

1.3. Value and sensitivity

1.3.1. The ES, for example Table 5.1 uses these terms synonymously, whereas this may not be the case. It is possible for sites to be designated for their landscape or ecological value, i.e. be of high value, but nevertheless have capacity to accommodate change (i.e. low sensitivity). The ES should recognise this – in particular because, as written, the ES will not focus on impacts on receptors of low value, for example local nature reserves – which may nonetheless by very sensitive.

1.4. Significance of effect

1.4.1. As a result of the issues outlined above, we are concerned that impacts may be defined as of less than moderate/major significance and therefore not significant, when that is not the case. This table should continue to reflect the precautionary principle so that the burden of proof remains on EDF Energy demonstrating robustly that impacts will be not significant.

1.5. In-combination effects ("interrelationships")

1.5.1. Consistency in terminology is particularly important to facilitate the measurement of in-combination effects. We are concerned that the ES could underreport these effects if it does not acknowledge the potential for accumulation of effects of minor significance. The ES should explain how the significance of an in-combination effect will be determined – for example, for a given receptor, is the significance of a moderate noise impact plus a moderate air quality impact moderate or major?

1.5.2. We would also expect the ES not to overlook opportunities to mitigate effects of minor significance so that they rather become 'negligible'.

1.6. Cumulative impacts

1.6.1. A chapter on cumulative and transboundary assessment (Chapter 10) is required and cumulative assessment is referenced throughout the remaining chapters. It is therefore assumed that cumulative assessment between the main development site and associated developments will be assessed as well as a cumulative assessment of the whole project with other developments in the area. A long list of proposals to be cumulatively assessed as part of the ES has been produced and we will continue to work with EDF Energy on ensuring that the short list of developments can be adequately assessed cumulatively with the Sizewell C proposal.

1.6.2. The ES should recognise that as a consequence of the Sizewell C development, the impact of existing development may change. For example if Coronation Wood is used (relocated facilities) this may affect the mitigation it offers for the existing Sizewell A and B developments. Consequently the assessment of the cumulative impacts should reflect any changes in the future baseline that would heighten the impact of existing development. The onshore elements of the consented Galloper and Greater Gabbard Offshore Windfarm's are also relevant in this respect.

1.6.3. While Sizewell is connected to the National Grid's high voltage network, local modifications and wider network reinforcement is required – the Councils understand this to be reconductoring of the Sizewell to Bramford line, and additionally a new line between Bramford and Twinstead – registered with PINS as the 'Bramford to Twinstead Overhead Line project'. The most up to date Need Case for that project confirms that, based on the currently contracted connection dates, Sizewell C, alongside the East Anglia Array, is a significant contributor to that need – however it is the Sizewell C project that currently triggers the need for the Bramford to Twinstead project1.

1.6.4. The ES should address the wider environmental implications of development elsewhere necessitated in whole or in part by the Sizewell C project.

1.7. Future baseline

1.7.1. With regard to the future environmental baseline, it should be noted that all non-agricultural land within the Main Development Site is managed by Suffolk Wildlife Trust on behalf of EDF Energy. Consequently, the ES should not underestimate the environmental quality of the future baseline without development, and thus underestimate the impacts of the development.

1.7.2. Furthermore, the ES should recognise that the projected future baseline case includes consideration of how the Sizewell A and B sites will change under decommissioning over the construction life of Sizewell C.

1.8. Construction Programme

1.8.1. The ES should provide a phasing programme for construction so it is clear which activities are occurring when, and when mitigation will be delivered – for example the park and ride sites, Two Village Bypass, rail routes, beach landing facility, and accommodation campus. The timing of these will have a significant bearing on the impacts of the development and the Councils suggest very careful thought will be needed to ensure that they are delivered at the optimum time in the construction programme.

1.8.2. We note that the main construction could take nine to twelve years (including site preparation works) The ES should ensure that the full duration of activity is reported accurately.

1.8.3. Along with the phasing, the ES will need also need to detail the location of all major engineering tasks to be carried out (for example excavation work, dredging, dewatering, piling,

stockpiling of soil/peat, road building, demolition of existing buildings, use of explosives, construction of new buildings, borrow pit workings *et cetera*). It should be clear where engineering works are contingent on offsite constraints, a worst case in terms of the need for stockpiling should be assumed.

1.8.4. The ES will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. It is noted that 24 hour working shift patterns are likely to be used and consideration will need to be given to mitigating noise from night time and weekend works.

Alternatives

1.9.1. We welcome the intention to review alternatives for land required during construction (taken to mean not just the laydown land, but also all the associated development) – this consideration should of course not just include layout, but overall scale and location. With particular regard to sea defences, consideration also needs to be given to the north and south of the site, if coastal erosion and flooding affect these areas as may be predicted. The Intermediate Low Level Waste Store is taken to be included on this list under Main Development Site.

1.9.2. With reference to the construction laydown land adjacent to the main site, particular regard should be had to alternative options which reduce the impact on the AONB, for example using existing employment land in the vicinity. Similarly, the alternative of siting the Visitor Centre outside the AONB will need to be considered.

1.9.3. The Councils are concerned that in some cases EDF Energy has not sufficiently justified its preferred option and is therefore prematurely curtailing more detailed assessment of alternatives. Of particular relevance are the proposals for freight management which are a recent addition to proposals but not yet in a confirmed location.

1.10. Health Impact Assessment

1.10.1. The production of an HIA is welcome, and we expect it to maximise the potential positive health and wellbeing impacts on the proposed development. We expect it to identify all significant impacts on health.

1.10.2. The sections in the ES on air quality and noise and vibration will be particularly relevant to the HIA.

1.10.3. Monitoring and evaluation of possible health impacts should be conducted to inform ongoing assessment of the health impact.

Life span of the development/decommissioning

1.11.1. The ES should be clear on the duration of effects for which it is assessing – does the 'lifetime of the site' include the decommissioning phase? How does this also relate to the dry fuel store and their respective design lives? The design life for the long term storage should also be clarified.

1.11.2. The ES should, as far as is possible detail a programme for the decommissioning of the site. This should include;

- The types of works that will be undertaken,
- The removal of existing structures,
- The disposal of all remaining waste material,
- The suitability of the site for restoration or future use.

1.11.3. It is expected that a separate Flood Risk Assessment (FRA) will be produced for the decommissioning phase; any mitigation actions arising from this FRA may have implications for the design of the Sizewell C site – so thought needs to be given at this stage to the decommissioning FRA.

2. TOPIC SPECIFIC COMMENTS

2.1. Housing

2.1.1. The Councils consider that we still need to establish and agree the details in relation to a potential Housing Fund with regards to potential mitigation proposals such as grants, bringing empty homes back into use etc. However, in order to appreciate what the Fund will need to mitigate, we need to understand the impacts arising from the Environmental Impact Assessment (EIA). The Fund will also need to be available early enough to enable the Councils to get some control over the market, especially the Private Rented Sector, and to ensure an adequate supply of affordable accommodation for our traditional customer base before Sizewell C gets underway and the impact of 1000+ workers is felt.

2.1.2. It is important to note that it is not just workers for the Sizewell C project that will have an impact on the housing market; there is a wider strategic impact on the overall housing market that must be considered and not just what to do with workers during the construction phase.

2.1.3. The Councils have yet to see any altered proposals on the site at Land East of Eastlands Industrial Estate (LEEIE) since we fed-back to EDF Energy on their original proposal and layout for it. (This relates to the Scoping doc, para 4.3.4), this would need to be adjusted / agreed with the Councils.

2.2. Design and Conservation

2.2.1. In summary:

- There is a need to assess the impact on Leiston CA - 6.9.13 not addressed.
- The structures on Orford Ness are now Grade II listed so need to be considered - 6.9.13 not addressed.
- The assessment needs to include Non-designated Heritage Assets (NDHAs) – 6.9.11.
- The ES will need to refer to conservation principles rather than the Design Manual for Roads and Bridges (DMRB) – 6.9.16.
- There is a need to use National Planning Policy Framework (NPPF) terminology – substantial/less than substantial – mapping of terms could be useful - 6.9.22 not addressed.
- There is a need for individual assessments as well as assessment of inter-relationships and cumulative effects for Grade I/II* and Scheduled Ancient Monuments (SAM) – not addressed.

2.2.2. Detailed EIA Scoping Report comments:

Appendix 1C (p32-33) for specific responses to 2014 comments – the Secretary of State (SoS) recommends an alternative/additional approach to the assessment methodology.

2.2.3. 6.9.11 – arbitrary 'buffer zone' has been decreased from 'minimum of 1km' to between 500m and 1km– we cannot be sure all affected assets will be identified – we would suggest that a Zone of Theoretical Influence (ZTV) or similar is used instead. The document states that justification for the study areas will be set out in the EIA. It is considered positive that there will be a focus on the potential for undesignated heritage assets.

2.2.4. 6.9.13 – the Councils previously requested that Leiston conservation area (7.5.20 of the 2014 report) and the designated heritage assets on Orford Ness were added to the baseline.

2.2.5. 6.9.16 – the Councils are pleased to see that a wider range of guidance documents are being used in the methodology including the relevant Historic England guidance on setting and Conservation Principles.

2.2.6. 6.9.18 – close to NPPF definition but not quite the same – we are unclear as to why it is not just quoted verbatim?

2.2.7. 6.9.22 – the Councils comments have not been taken into account – should use NPPF terminology – substantial or less than substantial or map the relevant terms clearly throughout e.g. high magnitude of change = substantial harm. While the Councils recognise the usefulness of looking at magnitude of change throughout the EIA it does not relate very well to the type of tests we apply when considering heritage impacts against the NPPF.

2.2.8. Table 6.12 – does there need to be an extra category? E.g. very high for Grade I/II* and SAMs?

2.2.9. Table 6.13 – confusing having adverse and beneficial impacts in one table – the Councils suggest these are separated out.

2.2.10. 6.9.25 – again the language is divergent from what local authorities use day to day – the Councils suggest that you map terms throughout for more clarity.

2.2.11. 6.9.27 – how does this relate to the NPPF requirement that great weight is given to the assets conservation? Low level of harm is still harm and should not automatically be considered acceptable without the need for mitigation – mitigation should be considered for any level of harm as it has the possibility of removing harm.

2.2.12. 6.9.28 – again the language is divergent from what we use day to day – map terms for clarity.

2.2.13. 6.9.29 – the Councils would prefer the level of harm to be described in NPPF terms and then mapped back to the magnitude of change criteria if necessary.

2.2.14. 6.9.30 – language is finally mapped – low or medium = less than substantial, high = substantial – unsure what the phrase 'however special consideration needs to be given to the particular context in which the assessment is taking place' means? Surely the 'context' is covered in the assessment? Also NDHAs 'of equivalent heritage significance' to designated assets – if they were of equivalent significance they would be listed or put forward for listing, all NDHAs should be considered.

2.3. Archaeology

2.3.1. The Councils are pleased that a revised Settings Assessment Scoping Document has been issued for review as further assessment regarding the impacts of proposals upon above ground heritage assets, especially in relation to new or modified scheme elements since 2014, is necessary.

2.3.2. 3.3.9 Sufficient time will need to be factored in for the completion of archaeological evaluation and mitigation work as part of this phase, especially in scheme critical areas, in order to prevent delays. As not all evaluation will have been completed by the time the EIA is submitted, mitigation requirements will be unknown in some proposal areas; therefore a cautionary worst case scenario approach will need to be factored in.

2.2.3. 3.3.15 Archaeological assessment and mitigation will need to be timetabled in ahead of all other site preparation works, apart from in areas where evaluation has been completed and no mitigation is required.

2.2.4. 3.3.16 Archaeological work as set out in the peat strategy will also be necessary as part of this stage of work.

2.2.5. 3.4.11 Phase 1- Archaeology should be included in this list.

2.2.6. 3.14 (and more generally) Archaeological assessment and mitigation must be scoped in for any other mitigation work (flooding, landscape, ecology etc.) involving ground disturbance, therefore the potential impacts of any proposed works upon archaeology should be identified in the EIA.

2.2.7. 3.5-3.10 Archaeology must be factored in as the first stage of site preparation work for all scheme elements.

2.2.8. Archaeological assessment and mitigation also must be scoped in for any associated works outside of the red line boundary which will be necessary in association with this scheme e.g. any new utility works.

2.2.9. 6.9.8/6.9.12/6.9.14 The EIA should be more transparent that although Suffolk County Council Archaeological Service (SCCAS) have advised full archaeological evaluation of all scheme

elements up front as best practice and the endeavour by EDF Energy to achieve this, restrictions such as land access, tree cover, ecological issues etc. mean that not all areas will be able to be assessed pre-DCO and so archaeological impacts will not have been determined for all scheme elements.

2.2.10. 6.9.13 No field survey has yet been completed for the green rail route so this statement is incorrect. Fieldwork has however been completed for the Darsham Park and Ride site and LEEIE.

2.2.11. The two-village bypass is missing from the list of new sites.

2.2.12. For all new scheme elements since 2014, or any other areas where archaeological fieldwork has yet to be completed, the Councils are not able to rule out the presence of significant archaeological remains therefore further archaeological fieldwork is needed to enable an informed assessment.

2.2.13. 6.9.14 The EIA must clearly set out where full evaluation has been completed and mitigation requirements have been identified as well as those areas where further evaluation is necessary (including the scope of remaining work required to be completed to inform mitigation strategies e.g. earthwork assessment, geophysical survey, trial trenched evaluation). Mitigation strategies will need to be covered by new Written Statements of Investigation (WSIs), which must be agreed with the Councils and Historic England.

2.2.14. 6.9.16. Current CIFA archaeological evaluation guidance, David Gurney's 2003 'Standards for Field Archaeology in the East of England' and SCCAS standard fieldwork requirement documents (2017) should also be referred to.

2.2.15. Table 6.12 High should also include non-designated assets of demonstrably schedulable quality (as per the NPPF).

2.2.16. 6.9.40 WSIs must be based upon evaluation results and agreed with The Councils and Historic England.

2.2.17. 6.9.41 Implications such as dust and spoil management during archaeological evaluation, and potential conflicts between archaeology and ecology, landscaping proposals and flood management works need to be considered.

2.2.18 6.9.43 The landscape scale of impact upon archaeology as a result of the Sizewell project alone and also how this will be enhanced by other major schemes in the vicinity will need to be considered.

2.3. Landscape and Visual Impact

2.3.1. The proposals methodology and scope for Landscape and Visual Impact Assessment set out in the scoping report are broadly acceptable. However, the Councils note the following:

1. The scoping report identifies a chain of technical agreement between the applicant and officers, it would be helpful if the applicant could organise and collate this material such that it can contribute to future discussions.
2. Although many technical matters have been resolved the extent and or location of all associated development has not yet been finalised, for example offsite habitat creation works and the extent and location flood alleviation works both of which can be expected to produce landscape and visual effects that will require assessment. It is therefore anticipated that additional discussions will be required regarding assessment of these aspects of the scheme to ensure they are properly and fully included.
3. Finally, it is proposed that the re-location of facilities works for Sizewell B is appended to the ES rather than integral to it. However given the intimate relationship between this development, the Sizewell C proposal and the existing stations (A and B) it is essential that the cumulative, or project wide effects (if these works form part of the DCO) in terms of landscape and visual impacts are accurately and fully assessed.

2.4. Ecology

2.4.1. 6.7 Terrestrial Ecology and Ornithology

2.4.2. 6.7 b) ii. Survey and Assessment (paragraphs 6.7.4 and 6.7.5) – Although it is acknowledged that a number of additional ecological surveys have been undertaken since the time of the 2014 EIA Scoping Opinion, many of these are now four or five years old (and will be even older by the time that the Environmental Statement (ES) is written/DCO submitted). Robust justification will therefore be required to demonstrate that the survey data used to underpin the assessments presented in the ES is fit for purpose and doesn't require further updating.

2.4.3. 6.7.7 'field surveys to be undertaken in 2019' - the Councils are concerned that there is not the time available for EDF Energy to complete all the necessary survey work, in accordance with guidelines and best practice.

2.4.4. 6.7 c) ii. Updates to baseline (paragraph 6.7.8) – Paragraph 6.7.8 states that, with two exceptions, the ecological baseline for the main development site remains the same as described in the 2014 EIA Scoping Report (paragraph 7.2.6 to 7.2.10). However, this does not recognise the comments made by the Councils on the 2014 report, particularly in relation to the errors it contained or ecological receptors which were omitted. It must be ensured that the ecological baseline presented in the ES is accurate and takes account of all of the available relevant information and comments provided by consultees. In addition, the created habitat at Aldhurst Farm is not going to be able to compensate on the massive scale required to mitigate impacts of the project. One concern is that the public access to Aldhurst Farm would be too disturbing for many species; use of this site for mitigation has not been agreed by the key stakeholders.

2.4.5. 6.7 c) ii. Updates to baseline (paragraph 6.7.9) – As with the comment above in relation paragraphs 6.7.4 and 6.7.5, robust justification will be required to demonstrate that the survey data

used to underpin the assessments presented in the ES is fit for purpose and doesn't require further updating. (6.7.10 - detailed ecological baseline for North and South Park and Rides and Green Rail Route – we look forward to receiving this data.

2.4.6. 6.7 c) iii. Further surveys/studies (paragraph 6.7.11) – Paragraph 6.7.11 identifies that detailed internal and external inspections will be undertaken of the buildings at Lower Abbey Farm and Upper Abbey Farm to inform mitigation measures for roosting bats. Inspection surveys alone may not be adequate to provide sufficient information on the use of the buildings by roosting bats to allow appropriate mitigation measures to be identified. Emergence/re-entry surveys, in accordance with published best practice guidance, should be undertaken to better understand the use of these buildings by roosting bats (as several buildings are known to contain bat roosts).

2.4.7. 6.7 d) i. Construction – Paragraph 6.7.18 identifies that natterjack toads (*Epidalea calamita*) may now be affected by the proposed development and therefore will be assessed as part of the ES. However, no reference to surveys for this species is included in paragraphs 6.7.11 and 6.7.12 (Further surveys/studies) and therefore it is unclear how the assessment of impact on this species will be made in the absence of up to date survey information?

2.4.8. 6.7.19 refers to 'no habitat loss from designated sites....and no significant effects on habitat features of interest' the Councils expect you to have regard to the list of Suffolk Priority Habitats List from Suffolk Biodiversity Information Service, and to set out clearly how they apply the mitigation hierarchy including enhancements (Biodiversity Net Gain).

2.4.9. 6.7 e) Potential mitigation – This section describes potential 'mitigation' measures which will be included within the scheme, however a number of the measures listed (particularly within paragraph 6.7.26) are compensation measures, not mitigation measures. For example, habitats created at Aldhurst Farm or as part of an offsite fen meadow strategy are compensation not mitigation. Given the ecological impacts which it is already known will arise from the development as proposed (e.g. the loss of part Sizewell Marshes SSSI) it is essential that the mitigation hierarchy is robustly applied and that it is demonstrated within the ES why avoidance, then mitigation cannot be achieved before compensation measures are discussed. The information provided in the EIA Scoping Report does not give any certainty that the correct application of the mitigation hierarchy will underpin the assessments and conclusions within the ES.

2.4.10. 6.7 e) Potential mitigation (paragraph 6.7.26) – With regard to the specific embedded mitigation measures for the main development site set out in paragraph 6.7.26, bullet point 10 sets out that habitats suitable for reptile translocation have been prepared however the ES must demonstrate that these areas are suitable to support the reptile species which require translocation, and that they have not already been colonised by reptiles moving in from surrounding areas.

2.4.11. Also, it is noted from bullet point 11 that bat boxes have been erected as alternate roost sites in advance of construction. Given that there is outstanding survey and assessment work required for bats (as identified in paragraph 6.7.11) it should be ensured that these bat boxes are

not considered to be the sole roost mitigation required for this group as the final assessment may determine that additional measures are required.

2.4.12. Finally, in relation to potential mitigation measures, a Construction Environment Management Plan (CEMP) should form part of the construction mitigation for the Main Development Site (they are only listed as required for the AD sites).

2.4.13. General comment – In addition to the ecological receptors identified in the EIA Scoping report, the DCO must also include a shadow Habitats Regulations Assessment (HRA) which considers impacts on the SPAs, SACs and Ramsar sites within the identified study area.

2.4.14. General comment – There is considerable crossover between the terrestrial ecology and ornithology topic and several other topic areas (e.g. surface water/groundwater and recreation). It must be ensured that this is adequately addressed in the EIA, particularly where it relates to designated sites (i.e. hydrological impacts of Sizewell Marshes SSSI and displacement of recreational pressure to designated sites (both statutory and non-statutory).

2.4.15. General comment – Whilst the HRA will assess the impacts of displaced recreational activity on European designated sites, the ES must assess such impacts on other designated sites (both statutory and non-statutory).

2.5. Surface Water and Groundwater

2.5.1. Having regard to the submission and with reference to the 2014 Scoping Opinion, it would appear that the current document covers what would be expected with regards to this subject matter.

2.5.2. The Councils support the principle of the surface water and groundwater chapters being combined due to the connectivity between the two, especially in the vicinity of the Main Development Site.

2.5.3. The Councils note that 6.11.14 refers to no additional testing in 2019. We are of the understanding that they will be testing infiltration rates at all sites. This is a test of the geology. We would therefore expect it to be detailed in the geology chapter. This directly conflicts the statement made in 6.11.14. We have not seen any mention of proposed infiltration testing elsewhere in the document. The principle of whether infiltration will be used for each site should be established as part of the ES as this could ultimately dictate potential receptors and impacts.

2.5.4. 6.13.b.ii – there is the existing Leiston Surface Water Management Plan (SWMP) that is available for the town of Leiston and this identifies a known surface water flood risk adjacent to the LEEIE site on Valley Road. This was not available at the time of the 2014 EIA Scoping Report. The Flood Risk Assessment (FRA) for the LEEIE must include an assessment of the information contained within the Leiston SWMP.

2.5.5. The Councils note point 3.95 of the Planning Inspectorate's Scoping Response makes reference to water resources (potable water). We did not see anywhere in the revised scoping opinion that would cover this. We have an interest in this in terms of reusing surface water and we would therefore expect it to be covered in the EIA, it is worth noting at this point that the SoS suggested Utilities and Infrastructure Assets chapter has not been included by EDF Energy.

2.6. Coastal Management

2.6.1. 6.14.7 States that *`the landward extent for coastal hydrodynamics assessment is Mean High Water Spring (MHWS)'*. This is a repeat of the 2014 text however it is not clear if this boundary is set at a present-day (date of ES) baseline or a potential future baseline based upon shoreline projection over the site life to decommissioning (2150?). The Councils consider it should be the latter i.e. to the date of decommissioning. This position is consistent with text in 5.1.2 and 5.1.3 of the May 2019 EIA report that requires the EIA to cover short, medium, and long-term effects and for a precautionary approach to be taken where insufficient information is available to make a reasonable judgement at this stage. This definition is essential to ensure that uncertainty over potential impacts of the Hard Coastal Defence Feature (HCDF) on coastal processes over the site life to decommissioning are properly considered by the ES including consideration of the emerging EDF Energy position that, in the long term, mitigation for the exposed sea defences may become unviable and be withdrawn.

2.6.2. 6.14.17 States that *`In addition to the legislation and policies concerned with coastal geomorphology and coastal process listed in paragraph 7.13.16 of the 2014 EIA Scoping Report, the latest Suffolk Shoreline Management Plan (SMP7) will also be considered.'*
It should be noted that the SMP is now 10 years old and that some data and assumptions may need updating.

2.6.3. 6.14.23 States that paragraphs 7.13.21 and 7.13.22 of the 2014 Scoping Report are unchanged. 7.13.21 of the 2014 EIA assumes that natural variability in the system and the future baseline, in absence of the development, can be adequately characterised.

2.6.4. 7.13.22 of 2014 EIA states 'no limitation that could affect the robustness of the assessment has been identified to date'. The Council's believe that uncertainty over baseline shoreline evolution projections and the consequent impact of the development footprint on that evolution renders this proposition unsafe.

2.6.5. 6.14.24 Potential Impacts and effects.
7.13.23 of the 2014 EIA had two more bullets, as follows, that are removed in the 2019 update:

- *`Construction and operation of flood defence and coastal protection measures'.*
  The Councils strongly suggest that this item should be reinstated for reasons given in the Council response to item 6.14.7.

- *`Construction and operation of a jetty for the import/export of materials and AILs'.*

The Councils accept that this relates to the temporary jetty which is now removed from the design with a caveat that the Councils have yet to receive the full justification for the abandonment of the marine led proposal.

2.6.6. 6.14.26 States that `*timescales are unchanged from those described in paragraph 17.13.25 of the 2014 EIA Scoping Report'.* EIA 2014 17.13.25 text notes that timescale for effects on receptors `… *might extend several years beyond impacts occurring and monitoring and mitigation may be applied to address these effects*.' The Councils suggest that this understates the potential timescale, and this should state up to decades beyond impacts occurring. The key matter of concern is the impact of a block to natural sediment movement from an exposed HCDF could alter the natural (without development) evolution of adjacent coastlines for many years after until and beyond when the development is removed.

2.6.7. 6.14.32 States that `*The new hard coastal defence features could be exposed to the marine environment some decades into the future following recession of the shoreline and cessation of any mitigation. Exposure would be slower than naturally expected due to additional sediment provided by the naturally eroding soft coastal defence feature. Monitoring and additional mitigation may be considered to avoid the beach splitting in two and subsequent disruption to longshore shingle and sand transport*.'

The Council view is that this text does not properly represent the consequences of exposure of the HCDF. The Council suggests the following amendment:

The new hard coastal defence features is predicted to become exposed to the marine environment by ~2070 following recession of the shoreline. This is relatively early in the predicted asset life to full decommissioning of ~2150. Initial exposure would be slower than naturally expected due to additional sediment provided by the naturally eroding soft coastal defence feature. Monitoring and additional mitigation will be applied to manage the impact. Effective long-term mitigation of this forecast significant impact over the asset life is essential to avoid the beach splitting in two with subsequent disruption to longshore shingle and sand transport. The Councils believe this text to better reflect the 2014 EIA Scoping Opinion Comment and EDF Energy response in item 3.109 on p. 50 of Appendix 1C.

2.6.8. 6.14.33 States that `*The approach described in paragraph 7.13.37 of the 2014 EIA Scoping Report regarding the engineering design and proposed mitigation has been superseded and should be as follows: Mitigation would comprise, but not necessarily be limited to, the following measures:'* and lists 5 points.

The Councils suggest the following amended text as point 2:

A soft coastal defence feature made of beach grade sediments will be provided and maintained to provide extra material to the active beach face during large storms, thereby reducing any future erosion rate (current erosion rates are very low);.

2.7. Highways

2.7.1. The Councils understand that there remains some potential for changes associated with the transport strategy, particularly transporting materials to/from the site, and associated minor works, including local junction improvements. It needs to be determined whether any such further minor

improvements would be brought into the scope of this assessment or would be subject to their own Environmental Assessment, dependent on scale.

2.7.2. It is noted that the Sizewell Link Road is proposed within the EIA as a permanent feature, the adoption as highway of any new link road between the site and the A12 is yet to be agreed between the applicant and the highway's authority; however it is likely that the highway's authority would want to adopt part of the road as a minimum, and therefore this presents two options:

- Part Adoption: Some of the road would need to be removed following completion of construction of the site - this would lead to additional HGV movements and additional impacts that may need to be scoped within the EIA;
- Full Adoption: Improvement works are proposed along the existing B1122 to make it a less attractive route for vehicle trips and a more attractive route for cycle and pedestrian trips.

2.7.3. As set out at paragraph 4.3.5 the EIA will describe the main alternatives considered as part of the design evolution process for off-site associated development, it is worth noting that:

- The Councils expect the impacts of the marine led strategy referenced at Stage 2, but omitted at Stage 3, to be considered and evidenced as part of this process. Mitigation measures should be applied to those impacts which cannot be designed out of the proposals. The impact of the mitigation measures is as a result of the number of HGV movements on the highway network, which again is as a result of the lack of a sustainable transport strategy for transporting materials to the site.
- Suffolk County Council remain unconvinced that the proposed route for the Sizewell Link Road provides the greatest legacy benefit and are of the opinion that a more southerly route would reduce vehicle mileage associated with the site. We would expect a detailed assessment of the final route choice and main alternatives to strongly evidence that the submitted route choice provides the overall greatest benefit.
- The EIA should include a description of the alternatives considered with regards to the proposed diversion and closures of any Public Right Of Ways.

2.7.4. The Councils have recently received EDF Energy's Gravity Model for an audit to be undertaken. Whilst the assumptions that have been used within the Gravity Model generally appear reasonable, we will only be able to confirm acceptance of the model once the review has been completed.

2.7.5. As indicated at paragraph 6.3.11 the applicant has developed a number of microsimulation models and local junction models for detailed assessment. The number and location of the junctions that require localised modelling to be undertaken is yet to be formally agreed with the Councils.

2.7.6. With regards to assessment of the environmental impacts associated with transport, the following comments are made.

Magnitude of impact

2.7.7. The magnitudes of impact are set out under "Types of Impact" within the report, where the impacts are allocated to one of four categories: Negligible, Minor, Moderate and Substantial. These categories relate to those suggested in the IEMA guidelines and the DMRB, where the impact referred to here as "Minor" is termed "Slight".

2.7.8. There is some concern over the large proportion of effects that will rely on the application of "Professional Judgement" within Table 6.3.2 of the report. To inform this judgement and assist in reaching agreement, it is proposed that the assessment is informed and supported by quantifiable (evidence-based) analysis as detailed below. Where possible, effects should be quantified. EDF Energy should be aware that where 'Professional Judgement' is relied upon, without such data to support it, it is open to challenge by the Councils and other interested parties.

Severance

2.7.9. The magnitude of impact criteria remains consistent with the 2014 scope.

2.7.10. In addition to the IEMA Guidelines, a more detailed scale of impacts is set out in DMRB 11.3.8.7 Table 1, distinguishing between Built-Up and Rural areas and providing more detail as to their application. It is recommended that reference is made to this table. Areas where a 10% change in traffic flows is considered to be significant should be identified. It is noted that the categories adopted relate to changes in traffic flows along existing roads and are not related to any absolute measure of existing levels of severance.

2.7.11. DMRB 11.3.8.6 defines three categories of severance; Slight, Moderate and Severe. Although technically these relate to new severance, i.e. new highway schemes, they provide one possible way of quantifying severance in absolute rather than relative terms. To quantify existing levels of severance, it is suggested that reference is made to these categories and consideration given to reducing the thresholds of Impact for each level of categorisation.

Pedestrian Delay

2.7.12. The magnitude of impact criteria remains consistent with the 2014 scope. The use of a threshold of 1,400 vehicles per hour is supported by IEMA guidelines, though unilaterally applying these guidelines should be avoided – regard should be had to the health impacts on reducing pedestrian amenity or increasing delays in travel. We expect the figure of 1,400 vehicles per hour to relate to an exceedance in any hour, and not to represent an average. To assist in some quantification of impacts above this threshold, DMRB 11.3.8.7 figure 1 should be referred to

where mean pedestrian delays associated with different road crossing situations are presented in graphical form.

2.7.13. Consideration needs to be given to whether counts of pedestrian movement need to be undertaken at relevant locations, especially along the A12 and B1122.

Pedestrian Amenity

2.7.14. The magnitude of impact criteria remains consistent with the 2014 scope.

2.7.15. It is proposed that this will be assessed using professional judgment on links where there is an increase of more than 100% in either total or HGV flows. The use of a threshold of 100% does not appear consistent with the other thresholds. Using this criterion for assessing impact and risks will result in almost all of the impacts being dismissed as "Negligible". It is proposed that the percentage criteria adopted for "Severance" should be used to inform the assessment of pedestrian amenity. This would mean adopting a threshold of 30% above which impacts would be assessed as Minor/Slight, Moderate or Substantial. The 10% threshold should also be used for specifically sensitive areas. The existing levels of pedestrian amenity on the network should be assessed using DMRB 11.3.8.4

Fear and intimidation

2.7.16. Further information is required on the origin of the magnitude of impact criteria in order for it to be agreed with the Councils.

Driver Delay

2.7.17. The method suggested remains consistent with the 2014 scope.

2.7.18. The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement. The results of the local junction modelling should be considered when assessing the impact on delay.

Accidents and safety

2.7.19. The method suggested remains consistent with the 2014 scope.

2.7.20. The driver stress section of the DMRB 11.3.9 should be consulted as the use of the DMRB Driver Stress methodology would allow a more detailed assessment with respect to driver delay and road safety. DMRB 11.3.9.4 should inform the process of professional judgement.

Receptors

2.7.21. With regards to the sensitivity of receptors, consideration needs to be given to the need for all vulnerable road users, including cyclists and equestrians. Consideration should be given regarding

the ability of vulnerable road users to cross the road and the level of provision of crossing facilities. Major and Moderate receptor types should consider residential properties and their level of footway provision. Whilst the Councils accept the categorisation of facility types in general, consideration needs to be given to the scale and intensity of movement associated with any site. As an example, tourist attractions are categorised with a receptor sensitivity of minor but may have significant pedestrian movement especially that of young children associated with it.

2.7.22. With regards to the environmental impacts associated with traffic from the site, it is unclear whether the 'worst case' will be assessed. As set out in the IEMA document 'Guidelines for the Assessment of Road Traffic', it should be the aim of the assessor to assess the period of greatest change, rather than greatest impact, without quantifying the relative impact of traffic during each hour of the day and across the life of the development, the risk remains that certain impacts will not be fully assessed. For instance, it may be that relative increase in HGVs during the interpeak periods are far greater than those during the peak hours, or that the impacts associated with Early Years construction are proportionally greater than those associated with peak construction and confirmation is sought that this has been considered.

2.7.23. It is expected that furthermore detailed assessment of the transport impacts of the scheme, especially in relation to severance, road safety and delay would be picked up within the Transport Assessment.

2.7.24. With reference to paragraph 6.3.40, the Councils do not accept that SPR should be included in the reference case transport models and believe that the cumulatively impact associated with East Anglia 1 North and East Anglia 2 with regards to transport effect should be assessed as part of a sensitivity test, sitting outside of the reference case model. We would recommend that the method is submitted to and agreed with the Councils prior to submission.

2.7.25. It is worth noting that gaps remain in the information that has been provided to date, this includes information relating to the LEEIE, proposed highway mitigation and uncertainty remains over the proposed bridleway / costal path diversion, all of which may affect the exact nature of the proposals and the Environmental assessment.

Assumptions and Limitations

2.7.26. The assessment includes a number of assumptions which impact on the routing of traffic to/from the site most notably this relates to the number, timing and directional split of HGVs, which will need to be conditioned, the phasing of development and the origin and travel mode of staff. In order to ensure that the environmental impacts do not exceed those assessed, suitable conditions will need to be agreed through the DCO process (e.g. demand management of HGVs, requirement to achieve staff car share, travel planning, occupancy and delivery of the accommodation campus). As a result of the number of assumptions, and risks that these present, consideration should be given towards any necessary sensitivity tests.

2.7.27. These comments are based on EDF Energy Sizewell C EIA Scoping Report, dated May 2019 which is an update on the report previously presented in April 2014.

2.7.28. The Scoping Report identifies the proposed development site comprising; the power station platform, previous Sizewell B land following relocation of facilities and temporary construction area both north and west of the SSSI and at the newly proposed LEEIE. It also identifies and updates off-site associated developments, incorporating the potential for a freight management facility. The transport strategy is now narrowed to two options, one rail led and one road led, although both essentially move most of the materials by road. A significant change is made to spoil management which will be dealt with locally and the site will now have a permanent northern mound. As before the Scoping Report outlines the nature and purpose of the proposed development together with an overview of the key elements requiring impact assessment.

Transportation Noise

2.7.29. A noise and vibration measurement protocol utilising the Design Manual for Roads and Bridges (DMRB) together with a SoundPLAN methodology has previously been accepted to be used for the Road Traffic airborne noise assessment, utilising a $L_{A10,\ 1hr}$ parameter. The level change being considered along with the overall level and flow rate, based on 2 way flows for the early years and peak construction phase.

2.7.30. Rail operational noise and vibration assessment had previously been agreed to be assessed against BS:6472:2008, BS:7385:1990 and BS:ISO:4866. In light of the new World Health Organisation (WHO) Guidance 2018 and National Planning Policy Framework, noise assessment will now be represented in terms of Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) values and expected to be presented as L_{den}, L_{night} and L_{max} values instead of L_{AeqT} values within the EIA.

2.7.31. It is understood that a background noise and vibration measurement survey of road side and rail side locations is currently being undertaken to form a baseline survey from which noise and vibration criteria in the form of (LOAEL) and (SOAEL) are to be agreed. The EIA should present this noise and vibration monitoring data together with an assessment of magnitude of impact and sensitivity of receptors. Details of noise and vibration; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.

2.7.32. The EIA should also detail all potential cumulative impacts which might arise from other major projects in the vicinity, in particular the Scottish Power Renewables and other off shore projects which are proposed to use similar road networks.

Rail scheme

2.7.33. The Councils remain concerned about the movement of trains at night and would emphasise all efforts should be made to schedule train movements between 07:00 and 23:00 hours. Where train movements are required between these hours then the EIA should identify all receptors that are likely to be significantly affected.

2.7.34. The EIA should detail the degree of noise and vibration reduction likely to be achieved by any mitigation measures by way of comparison with the existing background and ambient noise and vibration levels. Where no mitigation is feasible details of a compensation scheme should be indicated.

Green rail route

2.7.35. The rail led strategy would extend the existing branch rail line into the construction site and is referred to as the green rail route. This temporary rail line is proposed to take 5 train paths per day delivering materials to a new rail head. Construction work to form this new line should be limited to normal working hours. Where noise or vibration from rail movements on the existing branch line or new section of track is projected or anticipated to have adverse impact on occupiers of nearby residential properties, based on the prevailing background noise and vibration levels the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where no mitigation is feasible details of a compensation scheme should be indicated.

Rail passing loop

2.7.36. A train passing loop is indicated between Ufford and Campsea Ashe. Construction work to form this new line should be limited to normal working hours. This loop is relatively close to residential property and consideration should therefore be given to minimising train waiting times during passing manoeuvres. If trains are intended to be held idling at this passing loop then noise mitigation screening is likely to be needed and should undertaken as part of the construction works.

Other rail line improvements

2.7.37. A number of other rail works (i.e. track crossover, bridge and crossing improvements etc.) are proposed to be undertaken to facilitate freight deliveries to the LEEIE. Construction works undertaken on these improvements should again be limited to normal working hours where possible. Where any of these works are anticipated to have adverse noise or vibration impact on occupiers of nearby residential properties, based on the prevailing background noise levels the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken.

New rail facility at LEEIE and possible alterations at Sizewell Halt

2.7.38. A new freight unloading facility is proposed at LEEIE. This would be created irrespective of whether a rail led or road led strategy is chosen. Two trains a day are proposed to be unloaded either utilising the existing rail terminal at Sizewell Halt with an overhead conveyor or a new rail sidings would be constructed at the LEEIE. The Councils preference would be to keep all the unloading in one location at the LEEIE where noise and vibration mitigation can be more easily achieved and negate the need for an overhead conveyor. Construction works undertaken to form this new facility should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new facility to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken.

Theberton bypass

2.7.39. The Scoping Report now indicates the route of a bypass around Theberton village in the event that a rail led scheme is chosen. Construction works undertaken to form this new bypass should again be limited to normal working hours where possible. The new road scheme should provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new bypass to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Road scheme introducing a new Sizewell Link Road

2.7.40. The road scheme proposes a new Sizewell Link Road which will run between the A12 south of Yoxford and B1122 south of Theberton. This would essentially bypass the villages of Theberton and Middleton Moor, and significantly reduce traffic movement through Yoxford village. Construction works undertaken to form this new link road should again be limited to normal working hours where possible. The new road scheme should provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this link road to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Two Village Bypass

2.7.41. The Scoping Report now indicates the route of a two village bypass around Stratford St Andrew and Farnham. This is proposed to take 24 months to construct and will greatly reduce noise and vibration for properties in both villages but will introduce increased noise to some residential properties surrounding the new road. Construction works undertaken to form this new bypass should again be limited to normal working hours where possible. As with the Sizewell Link Road, consideration should be given to provide effective noise and vibration reduction by way of; quiet road surfacing, speed limits, banking or screening so as to minimise impact on nearby residential property. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this new bypass to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Yoxford roundabout

2.7.42. A new roundabout layout is included for the A12/B1122 road junction at Yoxford, this should improve traffic flow and provide greater manoeuvrability to HGV's accessing the Sizewell route. The roundabout is located further away from residential property and should lessen existing road noise and vibration. However, the additional Sizewell C construction traffic is likely to impact some nearby residential property. Construction works undertaken to form this new roundabout should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this roundabout to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Freight Management Facility

2.7.43. The Scoping Report identifies two locations that are currently under consideration for the development of a freight management facility. This facility will only be required within the road led scheme. Both are located between the Seven Hill junction on the A14 and Trimly St Mary. There is little to choose between the two options except that there is a residential property close to option 2 at Innocence Farm which is likely to be impacted by noise and vibration from this facility. Construction works undertaken to form this freight management facility should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of this facility to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate;

which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Park and Ride Sites

2.7.44. The Scoping Report now indicates the preferred location of the two park and ride schemes to the north and south of the development. Construction works undertaken to form these park and ride sites should again be limited to normal working hours where possible. In the event that any adverse noise or vibration impact is anticipated during the construction or operation of these sites to affect nearby residential properties, based on the prevailing background noise and vibration levels, the EIA should indicate; which properties are to be affected, the level of impact and mitigation measures to be taken. Where noise or vibration mitigation works are likely to be inadequate or considered disproportionate for short term criteria exceedance, details of a compensation scheme should be indicated as recommended by BS:5228:2009.

Travel Plan

2.7.45. A sustainable travel plan has previously been presented for the construction workforce together with estimated geographical distribution maps of the home-based and non home-based workforce. Considered should also be given to linking the park and ride schemes with existing services to provide a network of access for commuters into some of the local towns and shopping centres.

2.7.46. A full travel plan for both construction workers and operational staff should be presented within the EIA and contain both physical and behavioural measures to increase travel choices and reduce reliance on single-occupancy car travel to reduce congestion, pollution and demand for parking spaces. There is no standard format or content but it would be expected to contain (but not exclusively):

- Objectives and targets,
- Priority given to non-car modes of transport or car sharing - signage, layouts,
- Controls on car parking (ensure adequate numbers of suitably designed parking spaces for disabled people; car sharing; pool cars),
- Nomination of a travel plan co-ordinator and associated support,
- Provision of improved public transport, cycling and walking facilities (e.g. lobby areas where information about public transport or car sharing can be made available, lighting, landscaping and shelters,
- Provision of shower and changing facilities and safe storage at convenient locations throughout the site,

- Well designed and conveniently located cycle routes and cycle parking areas,
- Electric bike and car charging points,
- Measures to facilitate public transport (e.g. shuttle buses to stations and other key destinations, negotiation with local transport providers, discounts on tickets etc.),
- Interim or aspirational targets for the breakdown of transport types (including staff transport and freight movements),
- Reduced traffic speeds (particularly during development),
- Travel information and marketing,
- Monitoring and review mechanisms.

2.8. Rights of Way and Access Response

3.7.6 Sizewell Link Road

2.8.1. Proposal is described as crossing 11 public rights of way and that solutions such as gates, stiles or diversions are likely to be used where demand for these crossings from vulnerable road users is necessary. SCC repeats its comments from the combined SCC/SCDC Stage 3 consultation response 29th March 2019 para 1008 that *the level of current usage must not dictate whether a safe crossing point should or should not be provided. We do accept that demand might influence the design of the safe crossing point that is provided. We also repeat that where public rights of way meet any new road, there must be safe, well designed crossing points with no fences, barriers, stiles or gates obstructing the PROW access.*

6.3 Transport

2.8.2. 6.3.4. Transport related impacts describe impacts that include severance, pedestrian delay, pedestrian amenity, fear and intimidation, accidents and safety but omits impact on other non motorised users such as cyclists and horseriders. These users should be included in the impact assessment as there are locations where bridleways and promoted cycle routes will be affected either by creation of new road (for example Leiston BR19) or through increased traffic on other roads. The Councils would look for EDF Energy to provide evidence in the form of baseline data for all types of user affected by the main site and associated developments.

2.8.3. Magnitude of impact 6.3.34 - Table 6.3: This table should include impact on cyclists and horseriders as mentioned above, and not just pedestrians in the context of delay and amenity.

2.8.4. 6.8 Amenity & Recreation

Associated off site development sites

East Suffolk Rail line

2.8.5. 6.8.12 The list of sites to be assessed should also include the level crossings on the East Suffolk Line that are proposed to be closed or upgraded.

2.8.6. 6.8.13 Rail improvements are proposed to be assessed with a 0.5km study area. Clarification is needed as to whether this includes the proposals for the closures of public rights of way across level crossings on the East Suffolk line and diversion routes provided as mitigation. If so, these should be listed and a study area defined by the distance of the proposed alternative routes.

2.8.7. 6.8.14 Baseline: The extended study area and the inclusion of the England Coast Path is welcomed. However, the focus of impact to date has been primarily on the main development site as evidenced by the locations of the visitor surveys that have undertaken. There appears to be little baseline information relating to the associated development proposals on the recreation and amenity, namely the proposed level crossing closures on the East Suffolk Line and the green rail route, the Sizewell Link Road, Theberton Bypass and the 4 Village Bypass.

2.8.8. This also has a bearing on the statement that the potential for project wide effects will be considered (6.8.34) to establish if additional mitigation measures will be required. A negative impact on the rights of way and green access network will have a detrimental impact on a tourism sector that relies on this green infrastructure.

2.8.9. 6.8.26, Table 6.11- The Councils welcome the inclusion of the level crossing works as in scope and repeat the comments from the combined response to the PEI that the assessment should consider the safety, accessibility and amenity of the proposed options as the rationale for assessing impact and not just the shortest possible diversion distance.

2.8.10. 6.22 Health and Wellbeing: 6.22.28 The Councils welcome the inclusion of the assessment of the potential impact on areas of open space that are important to good health and wellbeing being addressed in the recreation and amenity assessment. However, this assessment must include the wider geographical area covered by all the proposals including all the proposed level crossing closures and new roads (2 Village Bypass, Theberton Bypass & Sizewell Link Road).

2.9. Skills and Employment

2.9.1. As an overarching concern we thought that the scoping report should be setting the **conditions and process** for assessing and agreeing a baseline for data assumptions, not, as appears to be the case, setting the baseline assumptions themselves?

Further comments on specific sections as follows:

2.9.2. 6.2.3: In addition to the 2014 scoping opinion referenced the following should be included when considering the effects on employment, skills and the local and wider economy

2.9.3. The effect on all significant sectors that play a key part in economy of the local area (e.g. advanced manufacturing & construction).

- An assessment of the potential effects - not only during the construction period - but post completion of the construction work packages to help us understand how best to deal with the demobilisation of the project
- The estimated volumes as well as detail on the types and nature of jobs to be created
- The opportunities to maximise local recruitment across all levels and especially within higher level roles
- The expected/forecast split between roles that a migrant workforce new to area will fulfil and those that local people will fulfil
- The duration of the works and the cumulative demands and impact of SZC and other significant construction projects happening in the same window

2.9.4. 6.2.6: We welcome the regular revisiting of the baseline assessment date.

2.9.5. 6.2.8:

- We welcome the statement recognising that there will be significant negative effects felt locally and that this will be assessed. We will expect this to be clearly visible within the context of the wider assessments

2.9.6. 6.2.10: Population/Demography

- It is unclear why the baseline used for working-age populations has only included the areas of Suffolk Coastal, Waveney, Ipswich and Mid Suffolk?
- As well as increases in working age population, there will also be increases for those of pensionable age. Has pension age increases been considered as part of the assumption that working age population will stay broadly the same?

2.9.7. 6.2.13: Employment and labour market

- We are unclear what unemployment data has been used or what area is being referred to in 6.2.13? Is it the CDCZ?

2.9.8. When actually setting baseline assumptions other sources including 'Employment by occupation' and 'Qualification Levels' from the ONS Annual Population Survey should be used.

2.10. Public Health

2.10.1. These comments relate to the health aspects raised within the report. This has been shared with the Chair of the Health Working Group who is employed by the Clinical Commissioning Group (CCG) to ensure that the whole health landscape within Suffolk is aligned accordingly.

2.10.2. Since the last report in 2014, the EIA Regulations have been updated and now identify the need to consider potential implications of a proposed development on human health. It is noted that the change in this instance is minimal, in that a voluntary Health Impact Assessment (HIA) had been originally intended as part of the EIA process to follow best practice, addressing all requirements outlined in the 2014 EIA Scoping Opinion, and meeting all requirements of the EIA Regulations. It is

now proposed that the intended HIA will form a dedicated health and wellbeing chapter within the Environmental Statement.

2.10.3. It is also understood that the health and wellbeing chapter will be one of the last to be completed due to the sensitive interaction(s) with multiple other elements contained within the EIA which it will need to draw on (*i.e. Air Quality, socio-economics, recreation, amenities*). This means that the Councils will not be able to consult on the health and wellbeing chapter directly prior to the DCO application being submitted.

2.10.4. For this reason it is acknowledged that a full and robust engagement is needed between all health stakeholders throughout the process.

2.10.5. Considering the 2017 legislative changes as mentioned above, the comments submitted following the 2014 submission are still accurate and relevant, these being those highlighted in Table 6.45 (p264). There is insufficient detail on mitigation contained within the latest report to provide an assurance that these have been considered in full.

2.10.6. It is acknowledged that since the establishment of the multi-agency Health Working Group in 2018 that many issues have been discussed and are being worked on, as well as in other groups, in relation to the purview of Public Health.

2.10.7. Within the report there is no mention of early years provision. This is an area that the Councils would like to discuss further to review the potential impacts locally. We note that further work needs to be considered regarding the impacts on children's services. This includes further consideration of using a family liaison officer approach to support workers' families, accommodation impacts for care leavers and support for schools to deliver preventative work, as well as impacts on school places and early years capacity. We suggest that it would be helpful for EDF Energy to set up a short meeting with a range of relevant officers on one of the socio-economic workshop days to agree a way forward on these issues.

2.10.8.There is mention of vulnerable groups and the requirement of suitable services within the EIA. This needs to be further agreed and considered as there is not enough detail to comment fully on any mitigation(s). Likewise, ongoing, positive education arrangements through Schools, Colleges and local youth groups to further possible apprenticeship options and development of STEM subjects especially with girls.

2.10.9. There is still a lack of consideration of the community anxiety and stress that the construction may cause in the latest report.

2.10.10. In the report the main element of health is covered in Section 6.22. Further engagement through the Health Working Group to enable an open dialogue to inform the HIA is important. There is still the requirement of understanding the occupational health (O/H) provision on site and what this extends to. Once this is known then further work with existing health services can be undertaken within the community, primary care as well as secondary care providers. Once an O/H service has been procured, we would welcome the opportunity to link with this to ensure that local health campaigns, promotions and work placed offers are extended to the workforce.

2.10.11. The establishment of the Health Working Group (comprising of health stakeholders) is a key step forward in the working relationship and will continue to evolve as the project moves

forward. It is acknowledged that continued engagement is key to "design out" as many possible impacts that may be felt by the immediate and wider communities and on existing services.

2.10.12. In section 6.22.3 – the Councils would welcome further engagement through the Working Group to help supply specific information that may help in the provision of services.

2.10.13. In section 6.22.17 and 6.22.18 of the report, a full understanding of the study area for each determinant needs to be established. We would like to see this work undertaken as quickly as possible to allow for suitable mitigation to be established.

2.10.14. In section 6.22.21 - We would welcome the opportunity to help feed specific information into these studies given the local knowledge held and the ability of the Councils knowledge and intelligence team within Public Health.

2.10.15. In section 6.22.23 (*and Table 6.47*) - the Source-Pathway-Receptor model is proposed. We would like to discuss this within the Health Working group to ensure that the model considers aggregated and cumulative effects on health as well as the wider determinants of health.

2.10.16. In section(s) 6.22.28, 6.22.29, 6.22.30 - it is commented on the impact of the construction workforce to the local community facilities, economic impacts as well as impacts to local healthcare systems. These will need to fully be considered once the O/H provision on site has been established and then the way it will interact with the existing services. This includes a full understanding of the drug and alcohol testing and treatment arrangements, as well as sexual health screening, testing and treatment arrangements that may or may not include contract tracing. Where there are deficits in the onsite provision, then suitable mitigation will need to be discussed for those workers who may require access to the community service(s).

2.10.17. In section 6.22.30 the residual impact on healthcare capacity should draw on additional information such as the NHS GP Five Year Forward View and the Long Term Plan, in addition to the Accommodation Strategy and Occupational Health Care provision. These additional documents detail requirements regarding healthcare capacity and the population healthcare workforce requirements. This section should also draw on national statistics that review the prevalence of particular health conditions for the anticipated construction workforce, for example cardiovascular conditions.

2.10.18. In section 6.22.45 the potential mitigation should consider each healthcare element, as such the statement should reflect the following. Mitigation will be sought to limit the impact on Primary Care (GPs, dentists, pharmacy, opticians, GP Out of Hours and 111), Emergency and Acute Care (Hospital in/outpatient and ambulance) Community Care and Mental Health provisions

2.10.19. Furthermore we would welcome involvement with the workers code of practice and workers induction paperwork and what is expected on and off site as well as other areas such as links to include health promotion opportunities.

2.10.20. In section 3.2.10 - The worker accommodation highlights a range of diversionary activities that is welcomed to reduce risk taking behaviours. This should be easily accessible for those outside the campus, including those residing at the LEEIE Caravan Site. Suitable transport between

the two main accommodation sites should be considered for social activities. There should also be included a range of travel options between the two locations to promote sustained and active travel.

2.10.21. The Councils would also expect to see some form of electric charging spaces within the workers car parking with promotion of moving to less polluting forms of personal transport. The ratio mentioned indicates that there will be 1.6 beds per parking spaces. That equates to a 900 parking space difference. We acknowledge that this is a modelling assumption however how will the potential overspill be managed. Likewise, in section 3.2.11 – there is no reference to the number of parking spaces for those residing at the LEEIE Caravan site.

2.10.22. We would also like to see the Park and Ride locations make provision for a suitable number of charging points to promote EV use – see also environmental protection comments.

2.10.23. Air quality presents the single biggest environmental risk to human health and as mentioned in section 6.5.8. We welcome that the base line data will be revised and updated. We request that the results of these ongoing monitoring locations will be shared with the Councils to help provide data with regards pollutants as there may be the requirement of establishing an Air Quality Management Area (AQMA). Should an AQMA be declared then we would expect that EDF Energy will work closely with the Councils to look at suitable mitigation measures. This would include major transport routes to and from the site – see Air Quality comments.

2.10.24. Consideration to the mitigation of personal transport to reduce emission source pollutant(s) as well as methods to encourage active transport measures should be undertaken with the workforce. We would also like to see that the buses involved in the Park and Ride are suitably procured to be of a higher emissions class, ideally Class VI (see environmental protection comments).

2.10.25. In section 3.3.41 the operational emissions to the air refers to the range of emissions including SO_2, NO_x, PM_{10}, $PM_{2.5}$ as well as “discharge of radioactive gaseous effluents”. However, there is no indication of the way these will be monitored, mitigated or treated (see air quality comments).

2.10.26. In section 6.19.57 is the only reference to a Community Safety Management Plan (CSMP) within the report. We would expect that the CSMP would look to consider the impacts to the community around the proposed development and would include appropriate mitigation where a design out option is not possible. CSMP to include as many elements of community safety as is needed including but not limited to, social integration and community engagement projects. It should also look at the ways it will work with other agencies such as Suffolk Police to look at impacts and possible increases in crimes, for example, domestic violence, anti-social behaviours, spread of county lines and the “night-time economy”, and looking at the impact of local employers struggling to fill vacancies caused by existing staff being recruited.

2.10.27. The Councils would welcome further engagement in the development of the CSMP with EDF Energy through various events and meetings to look at ways to plan out potential issues and look at mitigation measures that might be required for those that cannot be resolved or which arise once construction starts.

2.10.28. In section 6.2 – we acknowledge the additional work undertaken in the establishment of the socio-economic factors that have been undertaken since the 2014 report, however some of the data on housing market capacity is based on 2011 census data where we would have liked to see

more up to date information to help inform the assumptions. We would welcome to opportunity to work with EDF Energy on this further.

2.10.29. In section 6.2.26, 6.2.27, 6.2.28 - The need for ongoing engagement to look to design out or mitigate through appropriate measures or funding the need to address the potential socio-economic impacts of the construction force as highlighted in table 6.2.4 of the report (p36).

2.10.30. The elements that related to health and wellbeing will be the last to be considered as highlighted in paragraph 1.2 and as stated in paragraph 1.3 above, we welcome ongoing discussions and engagement with EDF Energy.

2.11. Environmental Health

2.11.1. These comments are based on EDF Energy Sizewell C EIA Scoping Report, dated May 2019 which is an up date on the report previously presented in April 2014.

2.11.2. The Scoping Report identifies the proposed development site comprising; the power station platform, previous Sizewell B land following relocation of facilities and temporary construction area both north and west of the SSSI and at the newly proposed LEEIE. It also identifies and updates off-site associated developments, incorporating the potential for a freight management facility. The transport strategy is now narrowed to two options one rail led and one road led. A significant change is made to spoil management which will be dealt with locally and the site will now have a permanent northern mound. As before the Scoping Report outlines the nature and purpose of the proposed development together with an overview of the key elements requiring impact assessment.

1. Permanent Development Site.

2.11.3. The EIA should detail the programme of civil engineering works which are to be undertaken on site during the 'Constructional Phase' and provide the following information;

a) The location of all major engineering tasks to be carried out (e.g. excavation work, dredging, tunnelling, de-watering, piling, stockpiling of materials, road building, demolition of existing buildings, construction of new buildings, site drainage, flood protection works, use of explosives, concrete batching plant, mobile generators etc.),
b) The likely timing of these tasks (e.g. start and end dates where possible),
c) Approximate quantities of all excavated materials to be; stored or stockpiled on site, at lay-down areas, within borrow pits or at offsite facilities, including how this material will be transported,
d) Approximate quantities of all incoming inert materials to be stored on site or at offsite facilities, including how this material will be transported,
e) Where multiple forms of transportation are anticipated, information on how these facilities will be used (e.g. beach landing facility, rail sidings, road deliveries etc.)
f) The proportions of materials to be moved via each facility should also be indicated.

2. Off site Developments.

2.11.4. The EIA should provide a working programme, detailing the plant and infrastructure to be utilised for the construction of the off-site developments together with the likely time scales to complete each task;

a) Campus accommodation construction,
b) LEEIE, plus changes to Sizewell Halt,
c) Park and ride construction,
d) Freight management facility.

3. Transportation.

2.11.5. The EIA should provide a working programme, detailing the plant and infrastructure to be utilised for the construction of the transportation elements together with the likely time scales to complete each task;

a) Green Rail route in the event that the rail led strategy is chosen,
b) Other rail line improvements,
c) Rail facility at LEEIE or Sizewell Halt,
d) Theberton bypass, in the event that the rail led strategy is chosen
e) Two village bypass,
f) Yoxford roundabout,
g) Sizewell link road in the event that the road led strategy is chosen,
h) Other highway improvements, as part of the road led strategy.

4. Hours of Working.

2.11.6. The EIA will need to detail the hours of working both onsite and at any offsite facilities and the timing of all anticipated transportation movements to and from the site or to any offsite facilities. Where 24 hour working shift patterns are likely to be used additional consideration will need to given to mitigating noise from night time and weekend works.

5. Noise and Vibration during Construction.

2.11.7. A background noise and vibration measurement protocol was previously agreed with the Environmental Protection Team at East Suffolk Council. A survey of 33 measurement locations around the development site, together with 14 road side and 9 rail side locations has been undertaken to form a baseline survey from which noise and vibration criteria are to be agreed. The EIA should present this noise and vibration monitoring data together with an assessment of magnitude of impact and sensitivity of receptors. The EIA should also detail the impact on the loss of amenity and tranquillity to the natural environment. The EIA should also detail all potential cumulative impacts which might arise from other major projects in the vicinity, in particular the Scottish Power and other off shore projects which are proposed to use similar road networks.

2.11.8. Where noise or vibration from site construction working is projected or anticipated to have adverse effects on occupiers of nearby residential properties, based on the prevailing background noise levels, utilising BS:5228:09+A1:2014 and BS:4142:14; the EIA should detail the construction and demolition works (e.g. diggers, excavators, piling, riveters, mixers, explosives, pneumatic breakers, drills, dewatering pumps, boring equipment, compressors, generators etc.) and indicate which properties are to be affected, the duration of the impact and the mitigation measures proposed to be taken either;

a) At source,
a) By way of barrier or shielding,

c) Any other form of mitigation or compensation.

2.11.9. The EIA should also detail the degree of noise reduction likely to be achieved by the mitigation measures by way of comparison with the existing background and ambient noise levels. Methods of noise or vibration attenuation should be specified for each specific construction activity so as to achieve 'Best Environmental Practice'.

2.11.10. Any other acoustic or vibration data in respect of confined tones or low frequency noise propagation should also be made available within the EIA.

2.11.11. All site transportation movements or essential construction works (e.g. dewatering, dredging, beach landing facility etc.) which may be adversely affect nearby noise sensitive properties during the evening or at night should be particularly highlighted as these may cause sleep loss. Mitigation or compensation will be particularly important in these circumstances.

2.11.12. BS:8233:14 has been agreed as the design criteria for the new campus accommodation any changes to this should be outlined within the EIA.

2.11.13. This Council may consider control of construction site noise by the implementation of Section 60 of the Control of Pollution Act 1974 or by prior consent (if applied for) under Section 61 of the Control of Pollution Act 1974.

2.11.14. Details of noise and vibration; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.

6. Noise and Vibration during Site Operation.

2.11.15. Projected levels for general site noise from the newly constructed Sizewell C power station shall be calculated and represented as a $L_{Aeq\ (1hour)}$ value during daytime hours and $L_{Aeq\ (5\ minute)}$ value during night time hour's at all nearby noise sensitive properties. If noise from the site is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation should be specified to achieve 'Best Environmental Practice'.

2.11.16. Projected noise levels for grid reconnection's following reactor trips and outages shall be calculated and represented as a $L_{Aeq\ (5\ minute)}$ value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitation's on reconnection should be specified to achieve 'Best Environmental Practice'.

2.11.17. Projected noise levels for the proposed 'Stand-by Diesel Generator's' shall be calculated and represented as a $L_{Aeq(5\ minute)}$ value at all nearby noise sensitive properties. If this noise is anticipated to adversely affect occupiers of any nearby residential properties based on the prevailing background noise levels, then proposed methods of noise attenuation or time limitation's on testing times should be specified to achieve 'Best Environmental Practice'.

2.11.18. A proposed 'Complaints Procedure' detailing who will undertake investigations of noise complaints on behalf of the site operators and the scope of amelioration in the event that complaints are justified should be provided.

7. Lighting.

2.11.19. The EIA should detail; the location, height, design, sensors and luminance of all construction site floodlighting and all permanent site lighting, together with details of any mitigation measures used to;

a) Limit obtrusive glare to nearby residential properties including the extent of light reduction achieved,
b) Reduce light spread and sky-glow,
c) Minimise the loss of tranquillity and impact on wildlife.

2.11.20. Details of lighting; supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.

8. Water Quality.

2.11.21. The EIA should identify the magnitude and any potential impact on hydraulic continuity caused by: dewatering, coffer dam construction, spoil heap/stockpile leachate, runoff or infiltration, which may adversely affect private water supply quality in the area and specify proposed measures to protect the aquifer source.

9. Materials and Waste Management.

2.11.22. The EIA should detail the extent of the northern mound, all proposed stockpiles and borrow pits. It should indicate the; location, height, width, quantity of material utilised, times of operation and duration of use. Reuse of materials for bunding and site levelling should be indicated together with details of all imported materials. Control methods against; surface water run-off and dust deposition should be specified together with supervision, a monitoring programme to be undertaken by competent persons, a reporting protocol and a complaint procedure should be outlined within the EIA.

2.11.23. The EIA should detail all non radioactive wastes stored or disposed of on site, identifying and categorising material so as to indicate 'Best Environmental Practice' is being taken, (e.g. fuel oil stored in double-bunded tanks etc.)

2.11.24. Details of all temporary and permanent foul water drainage should be indicated within the EIA and the sea water disposal discharge should be agreed so as to;

a) Prevent ground contamination,
b) Minimise any harmful effect on sea life diversity,
c) Control temperature and turbidity which may encourage algae blooms.

10. Contaminated Land and Soils.

2.11.25. A site survey including samples from 150 locations across the Sizewell C site has been undertaken for the presence of Contaminated Material. This survey has not indicated any significant forms of contamination and as such the site remains in a low to very low category of potential risk for contamination. Additional sampling will need to be undertaken during site excavation and any identified contamination will need to be safely removed or encapsulation on site.

2.11.26. Details of any material (e.g. soil, peat, contaminated material etc.) removed from site for disposal purposes or safely encapsulated on site shall be notified to both the Environmental Protection Team at East Suffolk Council and the Environment Agency. Validation shall be required following this remediation action to indicate the site is suitable for its new specified use.

2.11.27. Detailed evidence in the form of certification to 'CLEA standard' will need to be supplied to indicate the source and suitability of all imported material used on site.

11. Decommissioning.

2.11.28. The EIA should detail a programme for the decommissioning of the site, as far as possible. This should include;

a) The types of works that will be undertaken,
d) The removal of existing structures,
c) The disposal of all remaining waste material,
d) The suitability of the site for restoration or future use.

2.12. Air Quality

2.12.1. There is an appropriate level of detailing provided for a scoping stage report. In general, good practice air quality assessment guidance has been proposed by the applicant. However, in view of the unique nature of this development, it is recommended that the study should go beyond these standard good practice guidelines. These recommendations are not specified because of insufficient detail, but rather reflect aspects which will become increasingly important as the scheme matures. The principal area of concern is ensuring that the full extent of air quality impacts associated with traffic changes due to the construction and operation of the proposed development are captured.

2.12.2. The "Two-village bypass" is proposed under both the rail-led and road-led transport strategy. The bypass could provide valuable mitigation of potential air quality impacts from 2022 onwards, when construction traffic associated with Sizewell B facilities re-location is programmed to start using the road network and 2024 for the off-shore windfarms. Consequently, it is recommended that construction of this bypass should be completed by 2022 to enable diversion of construction vehicles away from the Stratford St Andrew and Air Quality Management Area (AQMA).

2.12.3. NO_2 annual mean concentrations within the Stratford St Andrew AQMA have complied with the air quality objective (AQO) in recent years, although are still at risk of returning to exceedance if an increase in road emissions were to occur. Early availability of the bypass would assist East Suffolk in maintaining compliance with AQOs within the Stratford St Andrew AQMA.

2.12.4. It is unknown at this point whether increases in HGVs through villages on the A12 would be substantial enough to affect the risk of exceeding the annual mean and 1-hour NO_2 AQOs. The applicant has stated that they will share their preliminary dispersion modelling results before the final EIA submission. These preliminary results will inform a view on whether a bypass is required for the other villages from an air quality point of view.

2.12.5. Preventative mitigation has already been suggested, to minimise impact of emissions from construction vehicles and plant, so far as practicable with current technology. The applicant may demonstrate that there is no risk of exceeding air quality objectives with more polluting construction vehicles and plant than those recommended. This is an acceptable approach, although efforts are being made at this stage to request the lowest emission technology available for use with Sizewell C. From an air quality perspective, a rail-led strategy would be preferable in avoiding adverse air quality impacts due to road traffic.

2.12.6. The applicant has taken into account best practice industry guidance for scoping in or out development activities which could give rise to air quality issues. The two key references are guidance documents produced by the Institute for Air Quality Management (IAQM) covering assessment and management of construction, and land use and development control. These two guidance documents are accepted methodologies within the air quality community for undertaking air quality assessments of dust nuisance and emissions from road vehicles and construction/operational plant.

- In order to facilitate use of electric vehicles for workers and contractors, the Councils request provision of electric charge points at the main site, park and ride sites, accommodation campus and freight management centre.
- We request that HGVs contracted to work on the Sizewell C development are specified as minimum Euro VI (or have equivalent emissions), to ensure that the cleanest vehicles are being deployed. This will be particularly important if the road-led option is chosen.
- We request that buses used for Sizewell C are either electric or ultra-low emission vehicles, to minimise the air quality impacts of the bus fleet.

2.12.7. 6.5.9 The Councils recommend that the IAQM/DMRB assessment screening criteria should be applied to the whole traffic model network, with detailed dispersion modelling carried out for any areas which trigger the IAQM/DMRB criteria. The applicant should apply this criteria to traffic changes during construction and operational phases for both the rail-led and road-led options.

2.12.8. 5.5.7 The potential infrastructure projects of East Anglia 1 North and East Anglia 2. In addition, the EIA application of Sizewell B needs to have a reasonable worst-case representation in the assessment of Sizewell C. For the phases of construction and operation that over-lap, the corresponding peak period traffic flows should be assessed. Justification should be provided for why the peak period traffic flows were not included in the air quality assessment.

2.12.9. 6.5.18 Table 6.8 Where the metric for screening overlaps between the two guidance notes IAQM criteria should be used and DMRB HA207/07 criteria should be disregarded. In brief, only speeds from DMRB should be used.

2.12.10. Tables 6.6 and 6.7 where receptors which are predicted to experience a beneficial or adverse change, bordering receptors should be included until the maximum extent of perceptible impacts have been considered. This is important to ensure that conclusions of significance and subsequent mitigation are thoroughly informed.

2.12.11. Receptor locations shared by the Councils should be considered within the applicant's assessment.

2.12.12. It is recommended that the applicant demonstrates that no more than 3 trains are stationary for more than 15 minutes per day. In addition, it should be demonstrated that concentrations of NO2 annual mean are below 22µg/m3 at areas of exposure within 30 metres of trains, thereby fully meeting assessment requirements within LAQM.TG(16).

2.12.13. The applicant should use IAQM's more stringent assessment thresholds for HGV movements within AQMAs.

2.12.14. For the avoidance of doubt, emissions from all potentially relevant sources should be assessed in the EIA using appropriate screening and/or detailed assessment methods.

2.12.15. It is recommended that all roads which meet IAQM assessment thresholds with the construction phase car parks should be assessed. The mitigation that Suffolk County Council and Suffolk Coastal Council (as was) have recommended in paragraph 81 of our previous scoping opinion would be sensible to minimise these impacts. Nevertheless, a worst-case approach to ensure a conservative assessment is recommended with the assumption that there will be no electric vehicles in emission calculations.

2.12.16. The assessment should include the consideration of explicitly modelling emissions from engine starts and movement. In addition, impacts from stationary cars through 'hot soak' should also be considered in assessing local air quality concentrations of benzene.

2.12.17. Where road transport is the main emission source of concern the applicant should present modelled concentration for the following pollutants; NO_x, NO_2 PM_{10} and $PM_{2.5}$.

2.12.18. We request that engines used for rail movements are low emission.

2.12.19. To account for concerns that the 50mph speed limit sign location change has not altered driving behaviour. It is requested that the speed between 30mph and 50mph with the

highest NOx emissions is assumed for roads in and near the Stratford St Andrew AQMA. The annual daily average speed calculation should be weighted by the varying vehicle types. The annual daily average speed calculation should be weighted by the varying vehicle types.

2.12.20. The affected road network within a street canyon should reflect this with dispersion modelling. It would be satisfactory to include street canyons through zonal verification or in a dispersion model canyons module. Street canyon locations shared by the local authority should be considered within the applicant's assessment.

2.12.21. It is likely that spreading emissions over a 24hr period, regardless of when emission activity occurs, is conservative for assessment against air quality standards with an averaging time of 24hr or longer. There are key areas where programming dispersion models to release emissions at actual time of activity would be preferred to confirm whether 24hr emission spreading is conservative. These key areas are AQMAs within East Suffolk and Suffolk County Council and the areas with suggested street canyon locations. It is requested that predicted 1-hour mean concentration due to construction traffic should be specifically modelled for comparison against the objective for the 99.79th percentile of 1-hour mean concentrations. Because of the specific nature of planned construction programme, LAQM TG(16)'s screening guideline of annual mean 60 µg/m^3 as a proxy for risk of achieving compliance with the 1-hour objective should not be used.

2.12.22. The applicant should submit a construction dust nuisance assessment in accordance with the IAQM guidance, which presents all the information the guidance requests, including mitigation measures to offset impacts within the EIA. If features of the proposed development go beyond the scope of the IAQM guidance (e.g. coastal location; extended duration of construction programme; extensive storage of materials), this should be reflected in the applicant's assessment and proposed mitigation of dust impacts.

2.12.23. Assessment of nuclear island stacks – formaldehyde and carbon monoxide should be assessed further in the air quality assessment. If they are scoped out, clear justification for why should be provided. Formaldehyde and carbon monoxide emissions should be formally screened using a method such as the Environment Agency's risk assessment method (https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit.

2.12.24. The applicant should assess whether visible water vapour plumes could occur, and if so, should assess their potential effects on (for example) visual amenity and road safety. Visible plumes should be taken into account in the landscape and visual assessment.

2.12.25. The EIA shall detail all potential construction site works which may give rise to dust (e.g. excavation, demolition, use of explosives, movement of vehicles, loading and stockpiling of soil and rubble, crushing of material, concrete batching, production of asphalt). These shall be specified

together with the location and the particular methods of dust suppression to be used for each specific activity.

2.12.26. We request that air quality monitoring is undertaken at agreed locations during the works in order to confirm modelled pollutant concentrations. This should start 1 year prior to any early construction works in order to obtain a baseline and continue for the duration of the construction period.

2.12.27. Impacts upon Ozone concentrations should be assessed at areas with the largest increases in NO_x.

2.12.28. Where possible local information should be used to develop information on mix of different vehicle types, euro standards and weight categories for existing baseline emission calculations. For future baseline fleet mixes, should local data be used, it should be projected using NAEI's fleet turnover assumptions. http://naei.beis.gov.uk/data/ef-transport. A sensitivity test for the future baseline and construction and operation scenarios should be undertaken. Which demonstrates what the potential concentrations could be if fleet projections and associated emission standards are not achieved. The fleet mix for construction scenarios should as accurately as possible reflect the proposed construction vehicles fleet.

2.12.29. Any non-road mobile machinery (NRMM) plant should meet stage IIIB engine standards from the NRMM emission standard 97/68/EC directive.

2.13. Emergency Planning

2.13.1. The EIA Regulations 2017 require that: *Any significant effects arising from vulnerability to major accidents and disasters are identified, described and assessed.* Within the GB, the statutory responsibility for assessing natural and man made risks falls to the Local Resilience Forum (LRF) under CCA legislation, specifically CCA Regulations 2005 (Regs 13-15). The EIA does not mention this statutory process and it must do, especially in Stage 1 Identification of Risk (p.222). Stakeholder engagement on major accident risks must be via the Suffolk LRF and not just local authorities and emergency services (para 6.19.19). The Emergency Services Working Group referenced in this para. does not focus on major accidents but on business as usual 999 responses. The group that needs to be engaged as the key stakeholder for major accident risks is the Suffolk LRF.

2.13.2. The EIA identifies a lot of references relating to controlling radiological risks and managing any exposure in the event of an incident. However, it does not mention the main regulation related to nuclear emergency preparedness (REPPIR 19) and it must do.

2.13.3. The key document that must be used to inform the EIA is the Suffolk Community Risk Register (para 6.19.26).

2.13.4. The criteria for a major accident (para 6.19.42) should also reflect UK references and not just EU as the UK has implemented EU directives via UK legislation. Major accidents, or emergencies, are defined by statute (CCA 2004) and are amplified by statutory guidance.

2.13.5. The potential mitigation of major accident effects paras (6.19.53 to 6.19.58) do not mention the main legislation that covers public protection from an incident at a nuclear site involving radiation, i.e. REPPIR 19. This section must also link with emergency arrangements made for other risks under CCA regulations.

2.13.6. In summary, the EIA is very EDF Energy project specific focused and ignores key nuclear emergency preparedness and civil contingency legislation. The Councils would seek to see this section changed.

2.14. Economic Development

2.14.1. The approach adopted needs to include an adequate analysis of **how the economic impacts of the development (both positive and negative) will be spatially distributed**. This is important because negative impacts such as congestion and labour market displacement tend to be concentrated close to the development site, whilst positive impacts tend to be much more widely dispersed. The Councils need to have a proper understanding of how many jobs and how much economic value the development might bring about within our own areas and within each locality, so that we can plan and invest accordingly and so that we can work with EDF Energy to develop appropriately targeted mitigation strategies. This is particularly important in relation to the gravity model approach and the labour market analysis used – both of which need to be capable of indicating what the economic impacts of the development are likely to be at County and ideally District level. Presenting key data on employment and the labour market simply in terms of the Construction Daily Commuting Zone (CDCZ) which incorporates three county council areas, two LEP areas and multiple local authority districts as set out on section 6.2.10 – 12 is not sufficient.

2.14.2. The approach proposed does not take any account/provide any **analysis of the cumulative economic impacts that are likely to occur due to other major energy and construction projects** that are expected to be taking place in the region at the same time as the proposed development of Sizewell C. We believe that there are significant challenges and opportunities that may well result from this simultaneous development (e.g.) increased demand for labour and skills shortages on the negative side/ the opportunity to develop a world class clean energy cluster/specialism on the positive side.

2.14.3. The Councils need to underline the **importance of the sensitivity test** which is not mentioned at all in chapter 6 (on socio-economics) or more specifically in section 6.2.32 which sets out EDF Energy's overall approach and assumptions on the workforce profile. This is critical to our negotiating position for mitigation but is decidedly (and perhaps unsurprisingly) below the radar in the scoping document.

2.14.4. Models used to forecast accommodation supply need to take account of recent changes to the taxation of second homes and the tax treatment of rental income which has already led to a 20% **reduction in private rented sector dwellings**.

2.14.5. We would like to see some **analysis carried out of the supply chain capacity** to service the development within the County – so that we can better understand the scale of the economic opportunity for Suffolk and the wider eastern region.

2.14.6. The **timing of any potential mitigation** needs to be carefully considered as part of the ES. In order to realise many of the positive economic benefits of the development, detailed planning and investment will be required well in advance of construction. This is especially important in relation to the development of skills and training provision and for building and enabling local supply chain capacity.

Thank you for taking the time to read our representation.

Yours sincerely,

[redacted]

[redacted]

Lisa Chandler
Energy Projects Manager
East Suffolk Council

Michael Moll
Sizewell C Programme Director
Suffolk County Council

Theberton and Eastbridge Parish Council
Sharon Smith, Clerk
Arbour House
Rectory Road
Middleton
IP17 3NP
01728 648576
parishclerkthebertoneastbridge@gmail.com

Gail Boyle
Case Leader
The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Theberton and Eastbridge Parish Council Response to Sizewell C EIA Scoping Report: EN010012

Theberton and Eastbridge Parish Council have a number of overall concerns about this submission from EDF Energy regarding the timing and contents of the Scoping Report (SR). We are perplexed that EDF should be presenting us with a further scoping report just weeks after completing its final Stage 3 of public consultation prior to an application for a Development Consent Order (DCO) early in 2020.

In their responses to EDF's recent Stage 3 consultation , statutory consultees such as the Environment Agency, county, district and parish councils, the major conservation bodies, community organisations and individual members of the public have been almost unanimous in their severe criticism of the lamentable quality and substance of the Preliminary Environmental Information (PEI).

Considering that this was the final stage of public consultation, there had been a clear expectation that the PEI would be a well developed draft of the Environmental Impact Assessment that EDF intended to present through its Environmental Statement (ES), within the DCO application, for review at the examination stage. We are very concerned that the scope for effective community engagement at the examination stage will be much more limited and that the potential for proper consideration of objections and alternatives, not properly considered in the Stage 3 consultation or addressed in this Scoping Report, will have been lost.

Throughout this extended process, including the 2013 Scoping Report, 2104 Scoping Report Opinion (SRO) and three stages of consultation, there has been little evidence that any account been taken of the Secretary of State's clear requirement in his SRO of May 2014 that much more detailed evidence was required on the impact of the development on the coast and the shoreline to the north and south of the development and on the ground water systems with the Minsmere Levels and the Sizewell Marshes. To date no real evidence has been provided to show that EDF truly understand the delicate and interconnected nature of the coast and flood plains inshore or the relationships between surface and ground water in this delicate designated landscape.

There are many references to mitigation within the scoping report and yet little evidence has been presented as to whether existing mitigation and compensation (Aldhurst Farm), already in place, is

performing or likely to perform the services being claimed. Showing *"likely effectiveness"* is a requirement in regulation 63 of the Conservation of Habitats and Species Regulations 2017.

Throughout the three stages of consultation and embedded within this SR are many promises of work in progress, studies to be done and non-specific "embedded mitigation". The reality is that very little of this information has come to light in the PEI presented at Stage 3 Consultation and the additions and changes that are contained within this updated SR will never be presented to the public in a consultation. EDF have stated that they intend to move directly to DCO with its associated ES. With such a tight timescale and such a huge workload outstanding we are concerned that even the ES will be subject to updates as any examination progresses, a process that will total disenfranchise the local Parishes and residents within the project zone to be able to respond and have their voices heard.

This Scoping Report whilst tackling some of EDF's new proposals leave little confidence, based on performance so far, that EDF are serious about tackling these issues and placing resolutions or mitigations before the public or statutory consultees in an acceptable fashion.

In EDF's Stage 3 consultation material there are major amendments to its earlier Stages 1 and 2 proposals. The decision to abandon any plans to construct a jetty, and, in consequence to present two options for rail-led and road-led transport proposals including bypasses and other road changes.

However, it would appear that this Scoping Report was written at precisely the same time as the Stage 3 Consultation was being drafted and it is clear that no account has been taken of the responses even where statutory authorities have questioned choices, such as the route of the proposed Sizewell Link Road and Theberton Bypass.

Indeed, EDF on 12 June circulated an update to Parish Councils "*We are currently reviewing all the responses received and will be updating local residents and communities on our next steps for the project within a few weeks. We will feedback to parish, district and county council representatives on the Stage 3 feedback at the Sizewell C Community Forum…"* At time of writing, a date for the next Community Forum has not yet been communicated.

Far from using the Stage 3 public consultation responses from statutory consultees , the conservation bodies, community organisations and individual members of the public to understand and potentially modify the significantly changed plans, EDF have pre-empted the outcome of the Stage 3 Consultation by creating a Scoping Report based entirely on their views prior to the Stage 3 consultation. This attempt to push their own view of the Sizewell C (SZC) project despite the lack of meaningful PEI information totally undermines the consultation process.

The consequence of this approach is that should further changes be needed in the proposals, this Scoping Report would not stand, and a new Scoping Report and Opinion would be required.

Major changes have appeared in the Stage 3 Consultation, removal of the jetty, addition of road-led and rail-led transport strategies, Theberton Bypass and Sizewell Link Road. Also, EDF have rejected alternative Sizewell Relief Road routes, at least one of which was proposed during the Sizewell B construction known as D2. A similar, but slightly different, route W has been considered in the Stage 3 consultation and rejected, in a somewhat cursory manner, citing *"difficult engineering*", and a claim that has been met with some disbelief.

No in-depth assessment has been undertaken on EDFs Link Road/Theberton Bypass route (Z) or EDF route W or the old Sizewell B route, D2, and the Joint Local Authorities Group (JLAG), comprising Suffolk County Council (SCC) and Suffolk Coastal District Council, now East Suffolk Council (ESC), have requested that a full assessment is done of these routes prior to any decision being made.

However, examining route Z proposal and W or D2 the contrasts and impacts could not be starker:

- Route Z starts at 40 metre elevation crosses the rail line at about 35 metres and then crosses Fordley Road and its river which is at an elevation of 11 metres. The land immediately rises to 15 metres and then 21 metres close to Trust Farm. The land then drops to 8 metres at Wash Lane and rises to 15 metres at Plumtreehills Covert and crossing Pretty Lane at 20 metres before crossing the Theberton Brook and slowly dropping in elevation to 14 metres at Moat Road and 11 metres joining the existing B1122 close to Theberton House.
    - Section 3.7.4 specifies that *"Where the link road crosses existing watercourses, typically on low embankments, new crossings would be built, sized to maintain the existing flows of surface water as well as to maintain ecological connectivity."* However, considering the landform at both Fordley Road/watercourse and Wash Lane/watercourse, to achieve such a result, significant cuttings and/or a much higher embankment will be necessary to achieve the appropriate road gradients.
    - A total of four watercourses are crossed in this plan.
    - This proposed road from the crossing of the railway line to its junction with the B1125 at Reckford Road will be plainly visible from across the Minsmere Valley to Westleton Common and Westleton Walks severely degrading the views from the AONB and RSPB Minsmere to the South West. It would also potentially be visible from Leiston Abbey at its junction with the existing B1122
    - There are a significant number of dwellings and more listed buildings close to this proposed route (30-40) than for route W or D2
- Within the Stage 3 Consultation documents, the route W proposal has had its start point pushed north towards Saxmundham, compared to D2, leaving the A12 at a point that would interfere with the ESC's Local Plan for housing development. However, if the junction with the A12 was brought back towards the B1121 junction with the A12, as proposed in the D2 route, the elevation of the road at the leaving point would be at approximately 25 metres. The railway at this point is in a cutting and the existing B1121 crosses the railway with a rise from the A12 of a few metres. A similar rise would be necessary for a bridge to cross the railway on a diagonal further to cross The Saxmundham Layers and B1121 north of the B1121 road junction for Sternfield and cross the River Fromus which is at an elevation of 8 metres. The valley rises to 22 metres and the route will then cross undulating land between 15 and 20 metres, crossing the old Theberton airfield before joining the B1122 at 11 metres, as for route Z.
    - The only river/watercourse crossing is the Fromus and the valley is relatively wide compared to those being considered for route Z requiring less embankments or cuttings to achieve appropriate road gradients
    - There is significant tree planting already in the Fromus valley to provide screening for both Hurts Hall and Saxmundham
    - The rest of the route has no viewpoints from within the AONB or other protected sites until it joins the B1122 close to Theberton House when it may be visible from Leiston Abbey as is also the case for route Z

- This route has far fewer impacts on dwellings (<10) along the route compared to route Z

We note that SCC, as part of the JLAG response to the Stage 3 consultation (paragraphs 726-774), were pleased that EDF have considered a Sizewell Relief Road, they argue that the most beneficial route, both from reducing journey times for HGVs travelling from the South, for legacy and reducing impact from the Scottish Power Wind Farm NSIPs the slightly more southerly version of route W (route D2) should be examined much more closely. They also criticise EDF for indicating their route W was effectively the D2 route proposed for Sizewell B, which it isn't, especially when the connection to the A12 is concerned and the issue that is raised with the ESC's Local Plan.

SCC also note that whilst they may be happy to adopt the Theberton bypass part of the EDF proposal, they have significant concerns as to whether they would adopt the Sizewell Link Road as it runs parallel to the existing B1122 and offers little, if any, additional commercial capacity, whereas a relief road such as D2 from South of Saxmundham to Leiston would have significant legacy value, reducing the use of the B1122 and offering a shorter route from the South to Sizewell A, B and C, Leiston Industrial areas, as well as providing improved infrastructure for the various proposed wind-farm and continental interconnector substation sites that are proposed for this area.

EDF are still uncertain in their Stage 3 Consultation whether Network Rail will be able to deliver the required changes to the rail infrastructure for either "option" and in what timescale, which will influence the choice of transport options and potentially the length of time that high volumes of HGV and other traffic would use existing roads.

It is our belief that the introduction of these major changes to the proposal should be properly assessed and discussed with the various statutory consultees and submitted to a further round of public consultation once an updated project plan has been discussed with statutory consultees.

The responses at Stage 3 from SCC, ESC and other statutory consultees currently do not support the proposals as presented at Stage 3.

We are concerned that once again, alternative sites are not being considered for this development (para. 4.1.3) both in terms of alternative, less environmentally sensitive sites also on EN-6 site list (EN-6 Annexe C) are available and should be considered prior to Sizewell. We note that where alternative solutions exist, Imperative Reasons of Overriding Public Interest ("IROPI") do not transfer to project level and that para. 2.44 makes it clear that the nomination of eight sites (within EN-6) enables the refusal of consent for an individual site, should it be appropriate to do so.

Also, from the point of view that the EDF proposal for a dual nuclear power station at this site is too big and the site can only really accommodate a single nuclear power station. Inclusion on the EN-6 sites list confers no acknowledgement that any individual project proposal will be appropriate for the site in question, and that as further project information is available the site may be considered inappropriate or unsuitable for a site and potentially be subject to refusal, as above.

EN-6 and the proposed new NPS state that new single nuclear power station sites would be expected to be in the region of 30 hectares in size, although it was cognisant that the exact size would depend on the specific design and configuration of the site. Currently the platform size for the proposed **dual** reactor development on the SZC site is only 32 hectares once relocation of some Sizewell B (SZB) facilities is complete.

During examination of the Stage 3 Consultation documents it has become apparent that there are several issues in attempting to fit two reactors onto this small platform;

- In previous consultations, the intention was to connect the generating turbines to the National Grid substation via underground galleries. However, we now know that there is insufficient space to construct these galleries within the footprint of the site and as a result three tall pylons have had to be introduced to facilitate these connections. These pylons are not in keeping with Sizewell being totally within the Suffolk Coast and Heaths AONB and on the foreshore of the Suffolk Heritage Coast
- The hard-coastal defence (HCD) currently proposed by EDF terminates just west of the existing sacrificial dune and 1 metre above the Ordnance Datum (OD). For the HCD to be effective, it should terminate **below** Mean Low Spring Tides which at Sizewell are in the region of 2 metres below OD. As currently designed, the HCD is inadequate as its termination point 1 metre above OD leaves the defence liable to immediate erosion once exposed

There have been suggestions that the whole platform be moved back and increased in size to resolve these issues, but EDF have said in public on several occasions that they do not think this is possible. The land to the West of the proposed platform is all low lying and within the Sizewell Marshes Site of Special Scientific Interest (SSSI) and consists of 10-metre-deep peat deposits, so would have a very significant ecological and hydrological impact and provide a significant environmental challenge to the SSSI. Also, there would be a significant increase in volumes of wet peat that would need to be neutralised and buried in the borrow pits providing a long-term watercourse pollution source and an additional engineering challenge to provide a stable power station platform.

At Stage 3 additional land take within the AONB have been proposed for permanent structures to the north of the platform on Goose Hill and to the south of the site in Pillbox Field, all of which is within the AONB and some of which is SSSI.

Lastly, as a Parish that has RSPB Minsmere as its immediate neighbour and a number of our local businesses rely on the tourism that results from visitors to the internationally acclaimed nature reserve, we whole heartedly support the points and objections made by the RSPB in their *"Annex – The RSPB's Detailed Comments on the Sizewell C Scoping Report"* (attached below) and request that they are taken as the view of the Theberton and Eastbridge Parish Council also.

Given all the above, we consider that the proposal to fit two reactors onto this very constrained and environmentally sensitive site is inappropriate and that any development should be limited to a single reactor. We await the publication of the new NPS consultation (to extend EN-6) along with its sites list and sustainability assessments and will respond with such a view.

Should such a conclusion be reached, this Scoping Report and it's 2014 predecessor would have to be completely re-worked and the entire construction site and associated developments would need downscaling and be subject to further consultation.

The haste that is being applied to this SZC project by EDF to get pre-works going through Sizewell B facilities relocation via a local authority planning application (DC/19/1637/FUL) and this premature Scoping Report, ignoring any assessment of the Stage 3 consultation response, is an indication of EDF's dismissive attitude to residents and consultees.

In summary we believe that this Scoping Report is premature. It should be postponed and only considered once all the Stage 3 consultation responses have been properly considered, discussed with statutory consultees.

Annex – The RSPB's Detailed Comments on the Sizewell C Scoping Report

1. Embedded mitigation

Several references are made to "embedded mitigation" within the scoping report (e.g. para. 6.7.26). We commented on this in our response to the stage 3 consultation:

"This is used to refer to measures such as the creation of a new marsh harrier foraging area as mitigation for loss of foraging resource due to noise disturbance. In line with the recent "People Over Wind" judgment, when mitigation is considered in the context of the Habitats Regulations Assessment, it will be necessary to first conclude that a likely significant effect exists before mitigation can be considered as part of the appropriate assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017."

2. National policy and regulatory context

2.1 Consideration of alternatives

Para. 4.1.3 states that alternative sites for the proposed development will not be considered as part of this EIA. As stated in our response to the stage 3 consultation, we consider that there is a need to discuss development site selection given the failure to progress other potential development sites which were identified in NPS EN-6 and assessed as potentially having lower impacts on nature conservation than Sizewell C (see Annex C of NPS EN-6). The stage 3 consultation materials stated that Annex C of NPS EN-6 justifies the acceptability of impacts from Sizewell C in the light of the scarcity of alternative development sites available. Currently, alternative development sites that are potentially suitable are available and it is therefore our view that the acceptability of bringing forward a site with potentially significant impacts on nature conservation before sites that may be less damaging should be examined. We therefore do not agree at this stage that the argument for no alternative development sites (scoping report para. 4.1.3) made in the 3 consultation materials (and based on NPS EN-6 para. C.8.57) is applicable given the current situation.

In addition, NPS EN-6 para. 1.8.4 states in relation to the Conservation of Habitats and Species Regulations 2017 ("the Habitat Regulations") requirements, following consideration of whether there are any alternative solutions, Imperative Reasons of Overriding Public Interest ("IROPI") do not transfer to project level and that para. 2.44 makes it clear that the nomination of eight sites enables the refusal of consent for an individual site, should it be appropriate to do so. We therefore consider that to justify the development of the Sizewell site in advance of (or without) the alternative nominated sites or any other alternative solutions, it must be demonstrated that Sizewell C would have the least damaging impact on the Natura 2000 network of the available options. This again emphasises the need for provision of timely, robust and comprehensive evidence to underpin the assessment of impacts to comply with both the EIA and Habitat Regulations requirements.

2.2 Permits and licences

All information provided through the environmental permitting and marine licencing processes should be made available for consideration at the examination.

3. Environmental statement

The Environmental Statement (ES) submitted with the DCO application should be complete and assessed thoroughly by PINS against benchmarks for quality of application. The application should not be reliant on significant updates being provided once in the examination. All impacts on nature conservation interests should be fully described, assessed and the significance of impacts clearly explained in the ES. All impacts predicted should include fully worked up possible mitigation in the ES. Monitoring should be employed to verify predictions and identify any unexpected impacts. It should not be used to defer consideration of mitigation until after the examination.

4. Impacts on designated sites and Minsmere

The high value of habitats and features should be recognised by reference to their protected status including designated sites, where applicable.

The construction and operation of the proposed development is likely to result in adverse effects on the designated sites and their species for example:

- The Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI) contains a complex of habitats, notably mudflats, shingle beach, reedbeds, heathland and grazing marsh and supports populations of important birds, including bearded tit, Cetti's warbler and shoveler, scarce plants such as whorled water milfoil and a number of rare wetland moths.
- The Minsmere to Walberswick Special Protection Area (SPA) is designated for its breeding bird populations, including bittern, marsh harrier, avocet, nightjar, woodlark and several wildfowl species.
- The Minsmere/Walberswick Heaths and Marshes Special Area of Conservation (SAC) is designated for its coastal and dry heathland habitats.
- The Minsmere/Walberswick Heaths and Marshes Ramsar site is designated for its variety of marine, freshwater, marshland and associated habitats. It also supports a number of rare plants, such as red-tipped cudweed, invertebrates including the narrow-mouthed whorl snail, and important rare breeding birds such as avocet.

The RSPB Minsmere reserve forms a part of the Minsmere-Walberswick designated sites.

There are also likely to be adverse effects from the proposed development on Sizewell Marshes SSSI:

- Sizewell Marshes SSSI is designated for its lowland wet meadows and extensive ditches which support important assemblages of invertebrates and breeding birds, and several rare species of plants.

The RSPB expects all potential impacts to designated sites and their species to be fully assessed in the ES. These assessments are also required as part of the Habitat Regulations Assessment (HRA) requirements.

5. Project lifetime

Para. 3.3.29 states "*The proposed new nuclear power station would have a design life of 60 years*." However, para. 6.21.40 states '*it is anticipated that the proposed development will be in use beyond the design life*.'

Para. 3.12.10 states "*The Interim Spent Fuel Store (ISFS) would be designed for a life of at least 100 years, which could be extended if necessary*." It would operate until a UK Geological Disposal Facility is available therefore the site must be protected from flooding in perpetuity.

It would therefore be reasonable to consider the proposed development as permanent when assessing the potential impacts.

6. Socio-economics (pp 71-79)

The stage 3 public consultation materials noted that significant effects may be experienced by visitors to Minsmere. The RSPB expects assessment of the impacts of the construction and operation of the proposed development on RSPB Minsmere and its visitors and where possible mitigation to be included within the ES.

7. Air quality (pp 98-106)

Information presented at the stage 3 consultation suggested potentially significant impacts may arise from dust deposition and nitrogen oxide emissions from the construction area affecting the Minsmere-Walberswick designated sites and Sizewell Marshes SSSI. The RSPB expects assessment of the impacts of deposition of dust and nitrogen on sensitive habitats and effective mitigation. This assessment should also inform the HRA.

8. Terrestrial ecology and ornithology (pp 114-122)

8.1 Designated sites and Minsmere

The potential impacts from construction and operation of the proposed development on breeding and wintering birds of the designated sites and Minsmere should be assessed – including foraging marsh harriers from the Minsmere-Walberswick SPA and waterbirds using the Minsmere South Levels (within the SSSI but outside the SPA but functionally-linked to that SPA). This should include the effects of noise, vibration, hydrological and coastal processes on waterbirds and marsh harriers of the Minsmere South Levels. The assessment will also inform the HRA. Full details of impacts and proposals for sufficient evidence-based mitigation are required.

Para. 6.7.26 proposes mitigation for habitat loss within Sizewell Marshes SSSI. The ES should also include justification for habitat loss within the SSSI as required by para. 5.3.11 of EN-1 (Overarching National Policy Statement for Energy).

Para. 6.7.21 proposes a control structure on the Sizewell Drain to maintain the hydrological regime of Sizewell Marshes SSSI. The potential impacts of this, and any other changes to hydrology arising from the project, on Minsmere and the Minsmere sluice should also be assessed and adequate mitigation proposed.

8.2 Age of survey data

We welcome the additional surveys completed since 2014 and those planned for 2019 to update the ecological baseline. The RSPB expects recent survey data for all protected species (including SPA and SSSI species) and habitats potentially affected and consider survey data from 2014 is too old to inform impact assessments without further verification and updates.

9. Amenity and recreation (pp 122-131)

The RSPB expects assessment of the impacts from construction and operation of the proposed development including impacts from displacement of recreational users to designated sites (which will also inform the HRA) and impacts on visitors to RSPB Minsmere. Full details of impacts and mitigation are required.

10. Groundwater and surface water (pp 161-167)

Table 6.18 notes the potential to change the surface water and groundwater flow and hydrochemical regimes and dependent ecological receptors during construction and operation. The RSPB expects assessment of the groundwater impacts (including eco-hydrological effects) on Sizewell Marshes SSSI, Minsmere South Levels (part of the Minsmere-Walberswick Heaths and Marshes SSSI) and the impacts of increased discharge to Minsmere Sluice from Leiston Drain on drainage of the northern parts of RSPB Minsmere. This should include assessment of the impacts of the construction (and potential breach) of the sheet piling and cut-off wall proposed as mitigation to provide separation between the construction site and Sizewell Marshes SSSI. The assessment must include full details of all potential impacts and propose sufficient and effective mitigation.

11. Flood risk (pp 167-173)

10.1 Flood risks to designated sites and Minsmere

Paras. 6.13.22-25 state there are potential flood risks to the surrounding area from construction and operation of the proposed development. The potential impacts from construction and operation on flood risk to RSPB Minsmere and Sizewell Marshes SSSI should be assessed.

The SSSI crossing cannot fail to act as a barrier to water movement in the event of a coastal breach and we expect a full assessment of the potential impacts on Minsmere. The Stage 3 public consultation materials also explained that the SSSI crossing could be raised in future to provide further protection against flood risk. We refer to our response to the stage 3 consultation:

'*We are concerned that this could have the effect of diverting flood water towards Minsmere and expect to see a full assessment of this scenario to demonstrate that no significant impacts would result.*'

We also recommend that the relationship between the flood risk assessment and impacts on hydrological function of designated sites is also identified and assessed.

10.2 Climate change effects

National Policy Statement for Nuclear Power Generation (EN-6) para. 3.6.7 states:

"*Applicants must also be able to demonstrate that they could achieve further measures for flood management at the site in the future if future climate change predictions show they are necessary*."

We expect to see an assessment that incorporates the effects of climate change on flood risk.

The effects of climate change should also be considered in the design of any mitigation to ensure that the mitigation remains functional throughout the necessary timeframe.

12. Coastal geomorphology and hydrodynamics (pp 173-183)

Minsmere and the Minsmere-Walberswick designated nature conservation sites are within the study area (para. 6.14.7) but are not listed as potential receptors (para. 6.14.25). The potential geomorphology impacts on designated sites and Minsmere must be fully assessed, taking account of the degree of uncertainty in modelling the pattern of coastal evolution over the lifetime of the project and climate change effects. Any mitigation required should be detailed with supporting evidence to demonstrate reasonable certainty that the proposed mitigation will work. We request a plan to monitor effects on coastal processes during construction and operation to ensure impacts are identified in a timely manner with agreed thresholds for triggering implementation of avoidance or remedial measures.

Flood defences and coastal protection measures (including the redevelopment of the Northern Mound) are permanent elements of the main development site (para. 3.3.6) and were identified as elements that could have impacts on coastal geomorphology and hydrodynamics in the 2012 scoping report (para. 7.13.23). They are not identified as such in the 2019 scoping report (para. 6.14.24) and there is no justification given for removing them. The RSPB considers impacts of flood defences and coastal protection measures on Minsmere and the Minsmere-Walberswick designated nature conservation sites should be included in the impact assessment, mitigation and monitoring programme.

13. Marine water and sediment (pp 183-190)

The thermal plume from the cooling water outflow could affect prey availability for marine birds e.g. red-throated diver, little tern and sandwich tern. The RSPB expect the impacts to be fully assessed.

14. Marine ecology (pp 190-211)

The cooling water system would entrain fish which are prey species for marine birds such as red-throated diver and little tern. The potential increase in shipping movements associated with the development could increase disturbance to red-throated diver. The impacts should be fully assessed.

15. Climate change (pp 239 –262)

14.1 Climate change resilience (CCR) assessment

Para. 6.21.51 states '*The CCR assessment will have a temporal scope of 60 years based on NPS guidance for the estimated operational design life of a nuclear power station. The CCR assessment will consider a*

high emissions scenario at the 10%, 50% and 90% probability levels to assess the impact of climate change over the lifetime of the proposed development.'

However, para 3.8.5 of EN-6 states:

"*In applying the policy on mitigation set out in Section 5.5 of EN-1, and having taken account of the effects of climate change over the lifetime of the project (including any decommissioning period), the IPC should be satisfied that the application will include measures where necessary to mitigate the effects of, and on, coastal change*."

The construction will last 9-12 years (para. 3.3.9), operation 60 years (para. 3.3.29) and decommissioning 20 years (para. 3.3.46). Furthermore, para. 6.21.40 states that '*it is anticipated that the proposed development will be in use beyond the design life*.'

Therefore, we consider the CCR assessment should have a temporal scope of at least 90 years to include construction, operation and decommissioning of the proposed development.

The lifetime of the Interim Spent Fuel Store is 100+ years, which could be extended if necessary therefore the temporal scope for that assessment should be 100+ years.

14.2 Designated sites and Minsmere

The Overarching National Planning Policy Statement for Energy (EN-1) states:

"*4.8.10 If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the IPC* (replaced by the Planning Inspectorate) *should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS*.

4.8.12 Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the IPC may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls)."

Protecting the proposed development from climate change impacts may cause adverse environmental impacts upon statutory designated sites and Minsmere and these will need to be included in the assessment. An appropriate monitoring and evidence-based mitigation programme will be required for the lifetime of the proposed development.

The CCR assessment should also include climate change effects on management of mitigation/compensation sites e.g. Aldhurst Farm, fen meadow and marsh harrier foraging habitat and on continued effectiveness of any mitigation for hydrological and coastal impacts.

From: [redacted]
To: SizewellC
Subject: EN010012 – Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation
Date: 20 June 2019 06:43:54

FAO: Gail Boyle

Dear Ms Boyle,
Further to your letter dated 23rd May 2019, Ufford Parish Council would like to make the following comments regarding the Sizewell C Nuclear Power Station – EIA Scoping Notification and Consultation:

1. We are very disappointed that EDF's decision to drop the Sea Led strategy is accepted without comment (see section 3.2.13). We would ideally like to see this changed and EDF's decision to abandon the sea led option be subject to proper scrutiny.
2. With respect to the footpaths and rail crossings, these are not explicitly mentioned in the document, except very broadly under the heading "East Suffolk Line branch line upgrades and level crossing works" (see example section 6.8.26 table 6.11 which says these works will be assessed for impact on "amenity and recreation"). In addition, there is no detailed map of the closures, only the works in Plate 3.36 and 3.37. We would like to see the plans for all pedestrian crossings explicitly mentioned wherever reference is made to works on the East Suffolk Line.
3. The Passing Loop at Pettistree is subject to a draft Development Order and is close to the Ufford parish boundary. Our Footpaths Warden has written to the development agent, Ardent Management, to flag that there is a footpath that crosses the proposed line of the supply track. We would require this interest to be formally registered.
4. The Wickham Market 'park and ride' proposal will, in our opinion, have a massive negative impact on Wickham Market as a whole, in particular:
    a. Should the vehicles entering from the B1078 at the Border Cot Lane/High Street junction then this is a very narrow section of the High Street and it will force the introduction of compulsory parking restrictions in this area. This in turn will cause a massive impact on the residents of this area and of local roads where the residents of High Street will be forced to park. In addition, it is likely that residents will choose to park in areas such as the Community Centre, reducing capability for legitimate users
    b. Access to the P&R will almost definitely cause a delay at the 'Five-ways' Roundabout (where the B1116 meets the Main Road). As this continues the residents of the local villages will choose to shop in Framlingham and not WM, a drop in trade that could put some local shops out of business.

Kind regards,

Judi Hallett LLB (Hons) CiLCA
Clerk to Ufford Parish Council
Manor Farm, Hollesley, Woodbridge, Suffolk IP12 3NB
01394 411405 / [redacted]
Web Site: http://ufford.suffolk.cloud/

You have received this email from Ufford Parish Council. The content of this email is confidential may be legally privileged and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Ufford Parish Council, ensures that email security is a high priority. Therefore, we have put efforts into ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing the content of this email.
By Contacting Ufford Parish Council you agree for your contact details may be held and processed for the purpose of corresponding. You may request access to the information we hold on you by contacting ufford.pc@hotmail.com. You may request to be removed as a contact at any time by contacting ufford.pc@hotmail.com. To view Ufford Parish Council's Privacy Notice please ***click here***

From: [redacted]
To: SizewellC
Cc: [redacted]
Subject: Sizewell C Scoping Report
Date: 19 June 2019 08:51:13

This matter was discussed at a meeting of Westerfield Parish Council on June 18, 2019 and I have been asked to make the following comments:

EDF has plainly not had time to consider the substantive responses to Stage 3 proposals made by statutory consultees and others, and we are of the opinion that - by seeking a Scoping Opinion at this time - EDF is seriously undermining the consultation process.

EDF is seeking a Scoping Opinion far too soon after the close of Stage 3 consultations, and its proposals to conduct Environmental Impact Assessments are entirely based on the plans presented during those consultations.

If, as a result of the Stage 3 consultations, EDF amends its plans in the coming months, the Scoping Opinion would not stand, as EDF would need to assess the Environmental Impact on any new or revised plans.

In any event, Parish Councils have been given very little time - less than a month - to respond to this lengthy document.

Regards,

Rod

Rod Caird
Clerk, Westerfield Parish Council
26 Church Lane
Henley
IP60RQ
01473 831172
westerfieldpc@gmail.com

Please read our privacy notice here. It contains important information about how the Parish Council looks after the personal data of everyone we deal with.

WICKHAM MARKET PARISH COUNCIL

Chairman: Cllr Richard Jenkinson
Parish Clerk: Joanne Jones, Neutral Farm House, Mill Lane, Butley. IP12 3PA
Tel: 01394 459400, E-Mail: wickhammarketparishclerk@gmail.com/
www.onesuffolkwickhammarket.net

To: Gail Boyle
EIA and Land Rights Advisor, PINS
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref: EN010012-000670
Our Ref: WMPC-SZC Response Final-2019.06.20-PINS ES Scoping Consultation

20th June 2019

Dear Madam

Wickham Market Parish Council Sizewell C Response:
PINS Scoping Consultation for proposed Environmental Statement submission

Thank you for your consultation letter dated 23rd May 2019. In addition to this response we attach the WMPC response letter dated 20th March 2019 to Stage 3 of the EDF consultation.

We have the following overarching concerns regarding this consultation:

1. EDF is seeking a Scoping Opinion within a short time frame after the close of Stage 3 consultation, its proposals to conduct Environmental Impact Assessments appear to be based on the plans presented during that consultation. As an example Wickham Market PC expressed concerns relating to the inadequate resolution of traffic issues relating to the park and ride site in Hacheston; the proposed increase in its size and issues relating to design and lack of a lasting landscape strategy/scheme. The plan contained in Figure 3.9 has not been amended and therefore does not address matters raised in the WMPC response to Consultation Stage 3.

2. Given that EDF has not addressed the substantive responses to Stage 3 proposals made by statutory consultees and others, we consider that by seeking a Scoping Opinion at this time EDF is totally undermining an effective consultation process.

3. We would certainly expect EDF to consider amendments to the proposed southern park and ride site in light of the substantive comments made by WMPC to EDF at Stage 3 and in our letter dated 20th March 2019.

4. The Parish Councils have been given very little time to respond to this lengthy document, we consider this to be unreasonable given the significant issues raised by the documentation and the magnitude of the proposed development.

WMPC have focussed its response on elements which directly impact on this and our neighbouring Parishes, however we note and have concern regarding various amendments which are likely to exacerbate the environmental impacts associated with the development. These being:

Removal of the bridge option to provide access to the main development site from the north proposed to be replaced with a causeway/culvert and likely to increase environmental impacts.

Overhead lines are proposed to connect the new 400kV substation to the National Grid rather than underground cables, likely to increase urbanising visual impacts.

Planning applications for proposals recently submitted to ESDC in advance of the DCO for the Sizewell B relocated facilities; these involve removal of important landscape features/woodland and indicate a cavalier approach to the cumulative environmental, landscape and visual impacts arising from the totality of the development.

The removal of any marine-led strategy for the movement of construction materials.

TRANSPORT IMPACTS

The EIA scoping report; Page 23 Para 3.2.13 states:

'The descriptions of rail route options and road improvements provided in paragraphs 3.3.2 to 3.3.7 of the 2014 EIA Scoping Report have been revised. The elements described within these paragraphs are either no longer proposed or have been altered. The transport strategy now consists of two alternative freight management strategies: a rail-led and a road-led strategy.'

There is still no clear direction on the rail led option and the WMPC are concerned that a road-led option will create unacceptable highway traffic impacts. We reiterate the contents of our letter to EDF March 2019 which stated the following:

'*Assuming the sea led option is not being considered further then the choice is between a road led and a rail led transport strategy, in that case Wickham Market Parish Council strongly favour the rail led option. This option will remove about 150 HGVs off the roads every day at peak construction, which is essential given the fact that the roads are very near their capacity at present. Even with the rail led strategy it is appreciated that considerable road movement will still be required. It should also be noted that we still prefer the rail-led option even though the trains travelling at night will be heard in Wickham Market.'*

'Our major concern still relates to traffic as the current road network will struggle to cope with any increase. It is of deep concern that the Stage 3 consultation shows clearly that EDF have no confidence in Network Rail completing the required infrastructure work for a rail-led transport option on time. The project is of such importance that, with government assistance, Network Rail should allocate sufficient priority to the works to ensure timely completion.'

'The lack of traffic management for vehicles under 3.5T gives these vehicles free rein to travel on the route most convenient to them. With the significant increase in traffic this significantly increases the chance of "rat-runs" being created which destroys the character of Suffolk's country lanes.'

We expect to see all transport impacts relating to the project to be fully assessed with extensive mitigation proposals, including funding and improvements to public transport and EDF transport schemes, formulated. We have previously suggested that smaller park and ride sites be located along the major road links on brown field and/or developed sites (such as Martlesham park and ride site) and recommend that this option is considered further.

LOCAL TRANSPORT IMPACTS

The EIA scoping reports: Page 35 Para 3.4.2 states:

'The temporary park and ride facilities would be constructed to reduce the amount of additional traffic generated by the construction workforce on local roads and through local villages.'

We consider that the approach for one large southern site located at Hacheston will increase traffic travelling through local towns and villages on the main traffic routes from the south, west and east. The proposed diversion route for traffic to the west of this village is not suitable and cannot be supported by WMPC.

Both the diversion route and the wider traffic impacts will need to be fully assessed and with mitigating measures provided. These might include improvements to public bus transport on the road routes (B1116, B1078) and proposals for EDF bus transport to the park and ride site thus reducing car use.

The traffic impacts on the B1078 roundabout will need to be fully assessed, we currently consider there will be significant impacts on the traffic movements at this junction.

We have previously expressed concern regarding the methodology relating to traffic modelling and expect this to be taken into account within the EIA process. All cumulative impacts on our local roads from both existing and proposed traffic use will need to be assessed.

HACHESTON PARK AND RIDE SITE

We note the description given in para 3.4.6 of the scoping report in addition to the plans at Figures 3.9 and 3.10. These have not been updated since Consultation 3, WMPC are therefore disappointed about the lack of refinement to the design and mitigation proposed.

There must be a good footpath and cycle routes from Wickham Market to the Park and Ride, these should be included and assessed with the ES. The proposal to include a mere 20 cycle parking spaces appear to be insufficient. Rights of way should be protected and given wide buffer zones and safe crossing points to proposed access points.

The Southern Park and Ride is situated between two Special Landscape Areas (as currently designated) and close to the Marlesford Conservation Area in a prominent location. The ecological, landscape and visual impacts will need to be fully assessed with subsequent design measures including both on and off site landscape/ecological mitigation and enhancement measures provided.

With respect to visual impacts the proposed study area of 2km may need to be extended to ensure full assessment from Marlesford Conservation area, public viewpoints and properties at Campsea Ashe, Hacheston, Wickham Market and Marlesford, Marlesford and Glevering historic parklands (local designated) and public rights of way. Night time lighting/sky glow will need to be considered and assessed. There may be cumulative impacts with the current intrusive lighting at the five ways roundabout, suitable design measures and mitigation of impacts will need to be employed.

We remain concerned at the loss of part of the woodland, Whin Belt, the green lane/footpath and its associated ancient tree, this is skyline vegetation currently offering natural landscape mitigation to the proposed site. Detailed assessment should reveal the need for significant design amendments to be made prior to the ES/DCO being finalised.

There are opportunities to enhance the wider landscape which have to date not been adequately considered or embedded into the scheme design. The approach to the northern park and ride site follows appears to follow similar principles. The proposals to shield these large highly visible 'urban' sites by bunding alone is in the opinion of WMPC unacceptable. If wider boundary landscape enhancements were achieved a long-term legacy of landscape improvements (hedges, trees and woodlands) within the area could remain in perpetuity.

The impacts of all buildings and ancillary facilities, signage and lighting will need to be assessed. Viewpoints should be agreed with the LPA. We would expect all buildings to be low level and designed to suit this rural location.

We have noted the references to a Landscape Strategy in both the scoping report and the 2014 documentation. We consider that such a strategy should outline long term enhancement and management measures and should be both included and secured (via appropriate legal agreements and bonds) for all the Off-site developments including the northern and southern park and ride sites.

With respect to Page 37, Para 3.4.11 the construction programme should also include phases relating to critical mitigating elements:

- Advance planting;
- Ecological mitigation measures;
- Ecological habitat enhancement measures;
- Management of the above elements;
- Long term retention and management of the above after 'removal and reinstatement' of the car park and arable field.

WICKHAM MARKET DIVERSION ROUTE

We note the proposals outlined on page 43, Para 3.6.15 to 3.6.18.
We have previously outlined the following concerns:

'The junction of Easton Rd and the B1116 is very poor. The suggested improvements are fully supported.
The section of road from Easton Rd to Glevering Bridge is a flood plain which can be flooded for extended periods.
Glevering Bridge is a single-track listed humpback bridge. It is narrow, has a weight limit of 10T and visibility is poor making it difficult to see if vehicles are approaching. This bridge is damaged fairly regularly resulting in closure.
The EDF proposal suggests widening and re-aligning the stretch of road from Glevering Bridge to the B1078. These suggested improvements should make the road two way, but the number of corners will not make it an easy road to drive.
There is a 25m pistol range close to the proposed diversion route at the junction just east of Glevering Bridge. The proposed road improvements seem to impinge on the danger area!
The section of road past Valley Farm is well used by horses from the Valley Farm Riding Centre.
The junction where the diversion joins the B1078 is very dangerous. It is in a dip and vehicles coming from the Wickham Market direction will have very little time to stop should a vehicle be exiting or turning in to this junction.

It must be remembered that drivers will only use the proposed diversion route if it is easier. This proposed route is significantly more difficult to drive.'

The impacts arising from the current proposed diversion route will need to be fully assessed and designed with appropriate mitigation in terms of highway safety, ease/attractiveness of use (to avoid traffic issues in WM), ecological and landscape impacts.

The highways works will involve removing the deeply banked and hedged cutting of Valley Road which will require detailed landscape and ecological assessment. Measures to reinstate the road after use should be included in the ES.

These proposals will not address the desire by many to travel through the village centre, along the High Street and through the many smaller roads in the vicinity. Measures to improve the public transport system and the EDF bus transport links will need to be encapsulated within the ES in order to ensure highway impacts are minimised.

We continue to share the concerns of many other parties that EDF are not proposing to carry out a further 4th stage of consultation before submission of the Development Consent Order to the Planning Inspectorate.

However we welcome the opportunity to comment on the ES Scoping consultation and hope that the points raised with respect to some specific elements of the project will assist positively with amended designs and proposals prior to the preparation of the Environmental Statement.

Regards,

R J Jenkinson
Chairman
Wickham Market Parish Council

Cc MP Mr D Poulter
Cc District Councillor Ms C Poulter
Cc Sizewell C Team ESDC sizewellc@eastsuffolk.gov.uk

WICKHAM MARKET PARISH COUNCIL

Chairman: Cllr Richard Jenkinson
Parish Clerk: Joanne Jones, Neutral Farm House, Mill Lane, Butley. IP12 3PA
Tel: 01394 459400, E-Mail: wickhammarketparishclerk@gmail.com/
www.onesuffolkwickhammarket.net

Freepost SZC Consultation

20th March 2019

Dear Sir/Madam

Wickham Market Parish Council response to Sizewell C (SZC) stage 3 pre-application consultation

1. Introduction

1.1. This response represents the views of Wickham Market Parish Council. We have coordinated this response with surrounding Parish Councils. We understand that if the project goes ahead then EDF only propose one location for the Southern Park and Ride which is the Wickham Market option. Unless a suitable diversion route can be found for Wickham Market the Parish Council will not be able to support the SZC project.

1.2. Wickham Market is a large village which acts as a key service centre for some 24 surrounding villages. It lies just north of the A12 some 14 miles North East of Ipswich. The B1078 runs through the northern end of the village and this road connects the A14 to the A12. This route is used as a cut through by many travelling from the Midlands and wishing to go north on the A12 or vice-a-versa. The B1078 is a designated HGV route for vehicles accessing the hinterland villages northwest of the village such as Otley, Debenham and Debach. However, the B1078 is a narrow road and is not wide enough for two-way HGV traffic in many locations. At peak times there is already vehicle congestion on the B1078 in the section at runs through the village.

1.3. It is excellent to note that our concerns regarding traffic though the north end of Wickham Market that we outlined at Stage 2 Consultation were taken into account and two mitigation measures have been proposed at Stage 3. Unfortunately, neither of these measures withstand our scrutiny. It may be possible to amend the proposed diversion route to provide a workable solution.

2. Overview

2.1. In principle Wickham Market Parish Council are not against this significant project as it will increase employment opportunities for the residents and may slow the trend of Wickham Market becoming a retirement community. However, unless a suitable diversion route can be found for Wickham Market the Parish Council will not be able to support the SZC project.

2.2. Wickham Market is a large village which acts as a key service centre for some 24 surrounding villages. It lies just north of the A12 some 14 miles North East of Ipswich. The B1078 runs through the northern end of the village and this road connects the A14 to the A12. This route is used as a cut through by many travelling from the Midlands and wishing to go north on the A12 or vice-a-versa.

2.3. We are concerned that the Sea option for the movement of materials has been discarded with what seems to be inadequate justification. Left with the choice between a road-led and a rail-led option we strongly support the rail-led option.

2.4. Wickham Market are in the process of securing funding for a new Village Hall. At this stage we wish to put down a marker for a strategic Community Fund grant to assist with this project.

2.5. We are still concerned that no Delivery Management System (DMS) is to be used for LGVs as 700 movements a day are forecast of which 175 are associated with the Southern Park and Ride. A significant number of these are expected to use the B1078 as their route of choice.

2.6. It is noted that EDF's only proposed option for the Southern Park and Ride is the Wickham Market option. However, from Stage 2 to Stage 3 the size of the park and ride has grown from 900 to 1250 vehicles. We do not disagree that, from a traffic management perspective, having one large site is far easier to manage, but the option of a number of smaller park and rides on the southern side would significantly reduce the impact in Wickham Market and be more convenient for the workers. We urge that this possibility is given further investigation.

2.7. Wickham Market Mitigation Option 1 suggests removal of roadside parking on the B1078 from the junction with the High St to Rackham's bridge for the 12 year duration of the project and in our opinion is clearly not workable. Of interest Wickham Market is not currently considered to be of significant accident concern as the parked cars on the roadside have the effect of slowing the traffic down significantly. Wickham Market Parish Council strongly supports roadside parking and this view is borne out by our Neighbourhood Plan. Specifically, we think this option is flawed for the many reasons given in our response.

2.8. Wickham Market Mitigation Option 2 suggests a bypass for the village and this concept is very attractive, but the suggested route is not viable. Wickham Market Parish Council have suggested a possible alternative, but this option is not supported by all councillors. Should a bypass be provided it would provide an excellent lasting legacy for the village.

3. Wider Issues

3.1. The technology of smaller nuclear power plants is now significantly more advanced than when Sizewell C was proposed. It may be that it would be better to invest in a number of these smaller plants rather than sinking so much money into this one venture.

3.2. Climate change is a reality, and this is leading to a rise in sea levels. The UK Committee on Climate Change are estimating sea levels will rise by 1m by the end of the century. In addition, more extreme weather events are happening more frequently. Sizewell C is on the coast and its defences are only 14m above sea level. Should a record storm surge or a seismic event occur in the North Sea then the defences could be over topped and a disaster similar to Fukushima could result.

3.3. Sizewell C is not the only power project which is currently ongoing in East Anglia. There are number of offshore wind farms requiring substations and cabling. These projects will overlap with Sizewell C and the cumulative impacts should be taken into account.

3.4. The extra burden on emergency services created by the additional traffic in personnel coming to the area should not be underestimated.

3.5. It is evident from EDF's assessment of responses to Stage 2 Consultation that a Marine Led Freight Strategy was very well supported. WMPC support this method of moving bulky construction materials to the Sizewell C site. We are therefore extremely disappointed to see that the strategy is no longer being pursued. The option is discussed in a few short paragraphs without detailed reference to the background reasons for the dismissal. Cost, time and harm to the environment are all cited as barriers to the adoption of a marine led option.

3.6. Robust traffic management methods must be in place. However, if these methods depend on mobile phone communications an enhanced mobile coverage in East Suffolk will be essential. There are many pockets within East Suffolk where mobile coverage is extremely poor or non-existent.

3.7. The traffic modelling was done prior to the development of the new Local Plan by Suffolk Coastal District Council. This new plan proposes a significant additional amount of development within the A12 corridor which will create additional traffic. The cumulative effect is likely to mean that the rise in traffic has been underestimated.

3.8. Currently there is an hourly train service from Ipswich to Lowestoft. We are aware that Abellio East Anglia have an aspiration to run a half-hourly service on this line, but current infrastructure makes this impossible. With the investment that EDF would bring if a rail-led strategy is chosen it would seem prudent to use this opportunity to improve the infrastructure to a standard that would allow this to happen. This may then have the additional benefit that a greater number of trains would be able to be used in the rail-led strategy.

4. Sizewell C proposals: overall

4.1. In principle Wickham Market Parish Council are not against this significant project as it will increase employment opportunities for the residents and may slow the trend of Wickham Market becoming a retirement community.
4.2. Our major concern still relates to traffic as the current road network will struggle to cope with any increase. It is of deep concern that the Stage 3 consultation shows clearly that EDF have no confidence in Network Rail completing the required infrastructure work for a rail-led transport option on time. The project is of such importance that, with government assistance, Network Rail should allocate sufficient priority to the works to ensure timely completion.
4.3. The lack of traffic management for vehicles under 3.5T gives these vehicles free rein to travel on the route most convenient to them. With the significant increase in traffic this significantly increases the chance of “rat-runs” being created which destroys the character of Suffolk’s country lanes.

5. Main development site: overall

5.1. No Comment

6. People and economy

6.1. Sizewell C will provide a significant number of jobs but the current unemployment in this part of East Anglia is very low, consequently many jobs will have to be filled by people from outside the area. Hopefully, it will provide jobs for some school leavers and this may reverse the trend where youngsters are leaving the area in order to get work. With regard to tourism the owners of holiday lets may be extremely pleased as their properties may be full of site workers for the duration project. However, the tourist industry will suffer as there will be fewer holiday lets available thus reducing the number of visitors to the region’s tourist attractions. In addition, there will be much more traffic on the roads making it a significantly less desirable place to visit.
6.2. The additional personnel moving into the area for the project will place a significant burden on existing community facilities such as doctors, dentists and emergency services many of which are already working to capacity.
6.3. The additional demand for houses will push up prices. This is particularly worrying as the current average house price in Wickham Market is 7.6 times the lower quartile income which is one of the highest in the country.
6.4. Wickham Market are in the process of securing funding for a new Village Hall. At this stage we wish to put down a marker for a strategic Community Fund grant to assist with this project.

7. Accommodation: overall strategy

7.1. Wickham Market Parish Council supports the proposal to accommodate many of the work force on site as this will reduce traffic to and from the site. We realise that there are significant landscape impacts associated with this aspect of the project and strongly hope that these are taken into account in the final design,

8. Accommodation: temporary campus and caravan site

8.1. No Comment

9. Transport: movement of materials

9.1. Assuming the sea led option is not being considered further then the choice is between a road led and a rail led transport strategy, in that case Wickham Market Parish Council strongly favour the rail led option. This option will remove about 150 HGVs off the roads every day at peak construction, which is essential given the fact that the roads are very near their capacity at present. Even with the rail led strategy it is appreciated that considerable road movement will still be required. It should also be noted that we still prefer the rail-led option even though the trains travelling at night will be heard in Wickham Market.

9.2. Park and Ride facilities will be an essential part of the development and the concept of a Postal Consolidation Facility at the southern Park and Ride is a logical part of this strategy.

9.3. We are pleased to learn that both a Delivery Management System (DMS) and an Automatic Number Plate Reader (ANPR) system are proposed to track HGV movement for Tier 1,2 and 3 contractors.

9.4. We are still concerned that no DMS is to be used for LGVs as 700 movements a day are forecast of which 175 are associated with the Southern Park and Ride. A significant number of these are expected to use the B1078 as their route of choice.

9.5. We are pleased to see that measures have been put in place if there is an incident and these include an HGV holding area at the Southern Park and Ride and also at the Freight Management Facility (FMF). It seems that none of the modelling takes into account the relatively frequent occurrence of an Orwell Bridge closure due to high winds. A vehicle holding area, ideally south of the Copdock Interchange is believed essential in this scenario. If an Orwell Bridge closure happens then traffic will seek an alternative route. The second Orwell Bridge project has been shelved by SCC and the shortest diversion is through Ipswich which rapidly becomes very congested. The other favoured alternative, particularly if one is not travelling to Felixstowe, is via the B1078 which is designated as an HGV capable route. In the event of a road/bridge closure one would assume that contractors are allowed to deviate from their prescribed route, and this means a considerable number of HGVs could use the B1078, should the Orwell Bridge be closed, which would be unacceptable as there are several places on this route where two HGVs cannot pass.

9.6. We are concerned about the results of the traffic modelling. There are some results which do not make sense and are not borne out by the traffic monitoring

that we have done in Wickham Market. The figure which best estimates the traffic flow between the High St/Border Cot Lane junction and Rackham's bridge in Wickham Market is the one for location AC in table 6.2. This shows daily vehicle movement of 3650 and our measurements indicate that this figure could be 1000 movements a day short of the actual movements. It is also interesting to note that volume of traffic at location O in the Stage 2 Consultation was 4150 and this is reduced to 3850 in the Stage 3 Consultation document. We are aware that traffic flows were re-measured in Wickham Market in 2017 and suspect this is the reason, however, as your prediction is that traffic flows will rise, does it not indicate that a quieter period was used for measurement and hence the higher figure should have been used. It is also misleading to state that the current average daily figures in Table 6.2 are based on 2015 data, this cannot be correct as locations AC and AD were not monitored till 2017.

9.7. We are concerned at the increase in traffic shown by the modelling before Sizewell C commences. The consultation states that this takes into account housing growth between 2015 and 2027. The three locations where measurements were taken in Wickham Market O, AC and AD are predicted to increase by 61%, 48% and 44% respectively which is the 1st, 3rd and 4th highest of the 31 locations where the average growth was 24%. In addition, location P in Hacheston is only forecast to rise by 9% despite an explosion of houses in Framlingham since 2015.

10. Transport: Sizewell Halt or new rail siding

10.1. No Comment

11. Transport: rail led strategy, Buckleswood Road

11.1. No Comment

12. Transport: level crossings

12.1. No comment

13. Transport: level crossings (rail-led)

13.1. The Wickham Market named level crossing is in Campsea Ashe

14. Transport: road-led strategy, freight management facility (FMF)

14.1. We have no preference between the two proposed sites for the FMF, but we are in full agreement that an FMF is required on the A14. Of concern is the issue of an Orwell Bridge closure which has not been considered in the traffic modelling analysis. Neither of the sites proposed will be of any use for the 10 buses and 610 (Rail-led) or 1220 (Road-led) HGVs predicted at peak construction using the Orwell Bridge. An FMF, even if it is only an emergency FMF, is required at the Copdock Interchange location to cope with this scenario.

15. Transport: Park and Ride

15.1. Northern Park and Ride

15.2. No comment.

15.3. Southern Park and Ride

15.3.1. It is appreciated that EDF's only proposed option for the Southern Park and Ride is the Wickham Market option. However, from Stage 2 to Stage 3 the size of the park and ride has grown from 900 to 1250 vehicles. We do not disagree that from a traffic management perspective having one large site is far easier to manage, but the option of a number of smaller park and rides on the southern side would significantly reduce the impact in Wickham Market and be more convenient for the workers. We urge that this possibility is given further investigation.

15.3.2. We note that the Postal Consolidation Facility will generate an estimated 175 LGV movements a day and that no DMS will be used for these vehicles. We also note that no DMS will be used for private vehicles. Vehicles that are not controlled will travel by the easiest route and therefore any diversionary route must be better that the existing route if it is to have any effect.

15.3.3. The Southern Park and Ride is situated between two Special Landscape Areas and close to the Marlesford Conservation Area in a prominent location. There are opportunities to enhance the wider landscape and to mitigate visual impacts and this needs to be identified through the Landscape and Visual Impact Assessment process (LVIA) and reflected in the detailed design. If this were done a long-term legacy of landscape improvements (hedges, trees and woodlands) within the area can then remain in perpetuity. We are also highly concerned at the loss of part of the woodland, Whin Belt, the green lane/footpath and its associated ancient trees, this is skyline vegetation currently offering natural landscape mitigation to your proposed site. We made this point at Stage 2 consultation, unfortunately this issue has not been adequately addressed at Stage 3.

15.3.4. The junction where the traffic from the Park and Ride joins the A12 whilst heading north is poorly designed. The A12 should not be restricted to one lane before this junction as this will cause queues. The slip road onto the A12 heading north should be designed to be long enough to merge safely into the A12.

15.3.5. Junction at end of slip road when turning off the A12 going south onto the B1078 has very poor visibility. This must be improved.

15.3.6. The capacity of the 5 ways roundabout is questioned as it already struggles to cope at peak times.

15.3.7. Wickham Market would be an ideal location for some of the SZC workforce to reside. There must be a good footpath from Wickham Market to the Park and Ride and it would also be sensible to provide a safe cycle route.

15.3.8. The Park and Ride must be returned to farm land when the project is completed, and all measures should be taken to ensure that this happens. Wickham Market Parish Council are concerned that the land owner may wish

to retain that site for another use once Sizewell C is complete although we understand that this would need to be subject to a further planning application.

15.3.9. It is very disappointing that the proposed plans are not yet sufficiently detailed to get a clear understanding of the impact that this development would have. For instance, what shops, cafes, offices, facilities, signage and lighting would be provided on the site to cater for workers on long shift? We would expect all buildings to be low level and designed to suit this rural location.

15.3.10. Wickham Market Parish Council recommend that a shop selling beverages, snacks and papers should be located at this Park and Ride. It would be ideal if the local paper shop were given the opportunity to run this venture.

15.3.11. At the first Wickham Market junction on the A12 when heading north it must be clearly signed that the Park and Ride turning is at the next junction. If this is not done some will take this junction in error as it is likely that satnavs will direct vehicles through the centre of Wickham Market to reach the Park and Ride.

15.3.12. We strongly recommend that a sign saying “For Sizewell C Southern Park and Ride use A14 then A12” be placed on the eastbound carriageway of the A14 before the A14/A140 junction.

16. Wickham Market Mitigation Measures

16.1. We are very pleased to see that mitigation options are proposed for Wickham Market to cope with the additional traffic caused by the Southern Park and Ride however these options will not provide adequate solutions to the traffic problems.

16.2. The B1078 traffic passes through the northern end of Wickham Market just before it reaches the proposed Southern Park and Ride site and the A12. From the High St/ Border Cot Lane junction to Rackham’s Bridge there is predominantly parking on the southern side of the road making the road single track due to parked cars. There is nowhere else for residents to park their cars and EDF have confirmed that there has been no attempt to seek locations or talk to landowners. In the section between Border Cot Lane and Spring Lane it is not possible for a driver to see if this section is clear before entering this stretch. The northern end of the village struggles to cope with the volume of traffic currently using the B1078, particularly in rush hour. The pavements on the north side of the road are narrow and often vehicles mount the kerb in order to pass vehicles coming the other way; this is particularly dangerous for pedestrians.

17. Wickham Market mitigation Option 1

17.1. The suggestion to remove roadside parking on the B1078 from the junction with the High St to Rackham’s bridge for the 12 year duration of the project is clearly not workable. Of interest Wickham Market is not currently considered to be of significant accident concern as the parked cars on the roadside have the effect of slowing the traffic down significantly. Wickham Market Parish Council strongly supports roadside parking and this view is borne out by our Neighbourhood Plan. Specifically, we think this option is flawed for the following reasons:

17.1.1. Removing parking will increase the speed of the vehicles on this stretch of road. It will also increase pedestrian use as residents have to access their houses. The road is not wide enough for two vehicles to pass in places and the pavements are narrow. This will significantly increase the chance of a serious accident.

17.1.2. There are 23 vehicle access points within this stretch many of which have restricted visibility. Faster traffic will only increase the chance of an accident.

17.1.3. The part of the route from Spring Lane to the Border Cot Lane junction is a route used by many children as they walk to and from school from Barham's Way and King Edwards Avenue.

17.1.4. Alternative parking would be required for about 90 houses. No alternative parking areas have been suggested as there are none which would be suitable.

17.1.5. There are 25 houses that have doors which face onto the road. Many occupants are either not too mobile or have young families. These occupants would struggle significantly if they had to walk any distance to their homes.

17.1.6. There is a small business park near to Spring Lane with 6 shops/businesses. Without on road parking they would struggle to survive.

17.1.7. This stretch of road is often used by horses as the road connects Bridge Farm livery with various local bridle ways.

17.1.8. Wickham Market is a key part of many cycle routes and this stretch of is used for many sportives throughout the year.

17.1.9. The additional traffic will raise the pollution levels on this stretch of road.

17.1.10. Traffic travelling faster will increase the noise and vibration which is already a problem for some houses very close to the road.

17.1.11. On bin days the footways are not wide enough for pushchairs, wheelchairs or rollators to pass without going onto the road. With faster traffic this also increases the chance of an accident.

17.1.12. There are 41 listed buildings/structures in Wickham Market and 7 of these are located on this stretch of road. The historic environment will undoubtedly be damaged if no mitigation measures are provided.

18. Wickham Market mitigation Option 2

18.1. In principle the option of a bypass is very attractive, but the following observations on the proposed route indicate that the proposed suggested route is not viable:

18.2. The junction of Easton Rd and the B1116 is very poor. The suggested improvements are fully supported.

18.3. The section of road from Easton Rd to Glevering bridge is a flood plain which can be flooded for extended periods.

18.4. Glevering bridge is a single-track listed humpback bridge. It is narrow, has a weight limit of 10T and visibility is poor making it difficult to see if vehicles are approaching. This bridge is damaged fairly regularly resulting in closure.

18.5. The EDF proposal suggests widening and re-aligning the stretch of road from Glevering Bridge to the B1078. These suggested improvements should make the road two way, but the number of corners will not make it an easy road to drive.

18.6. There is a 25m pistol range close to the proposed diversion route at the junction just east of Glevering bridge. The proposed road improvements seem to impinge on the danger area!

18.7. The section of road past Valley Farm is well used by horses from the Valley Farm Riding Centre.

18.8. The junction where the diversion joins the B1078 is very dangerous. It is in a dip and vehicles coming from the Wickham Market direction will have very little time to stop should a vehicle be exiting or turning in to this junction.

18.9. It must be remembered that drivers will only use the proposed diversion route if it is easier. This proposed route is significantly more difficult to drive.

18.10. A possible alternative new road is shown in red below:

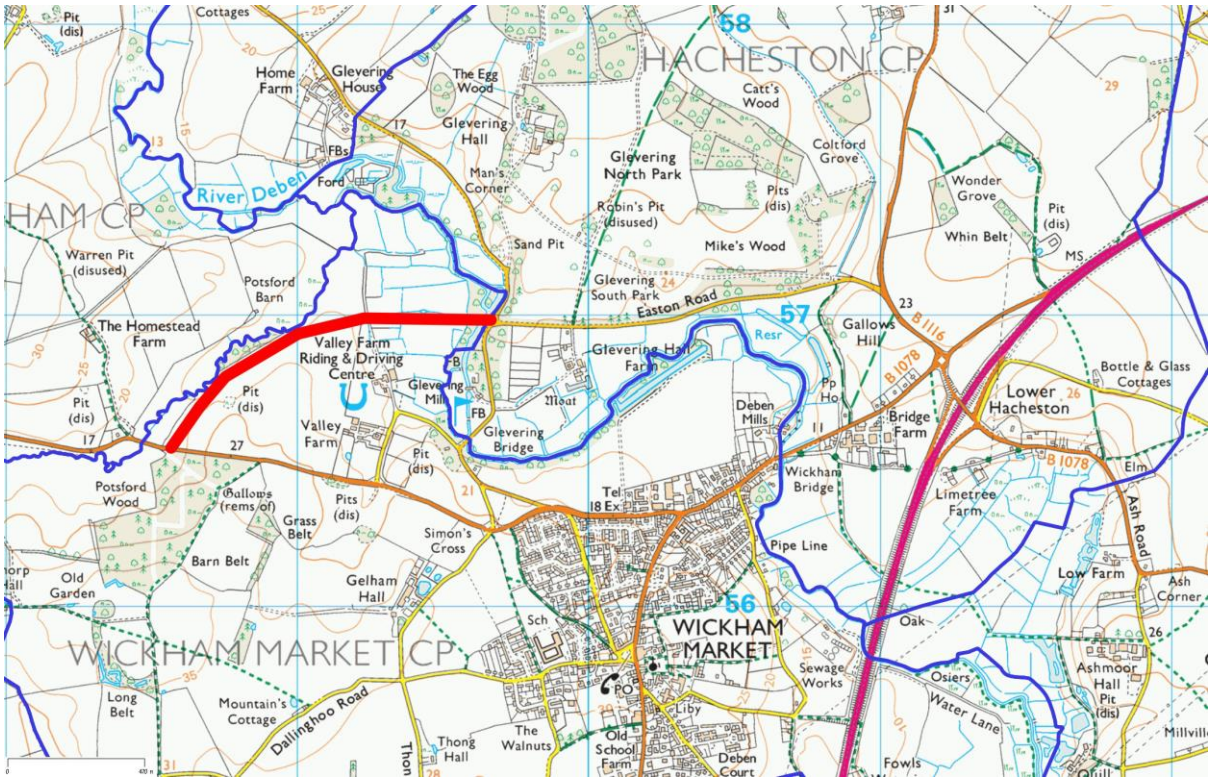


Figure 1 - Map showing Proposed alternative Route

This alternative has the significant benefit that road users will choose this route in preference to the existing road route as it will be quicker, a better road and an easier journey. The bridge/crossing over the River Deben will not be easy as it is on a flood plain however, once built it will form an extremely positive lasting legacy for Wickham Market as it will significantly reduce current HGV traffic through the north end of Wickham Market. It is appreciated that this option is not ideal from an environmental perspective and certainly does not have universal support within the Parish Council so if EDF could propose a better diversion route then that would be ideal. Alternatively, if there are significant environmental objections, the diversion route could be temporary, thus the river valley would be returned to its natural state after the project.

19. Transport: A12 two-village bypass

19.1. Wickham Market Parish Council agree that, of the 4 options proposed by EDF at Stage 2, the two-village bypass is likely to be the most beneficial option. That said the strong consensus within the village is that a dualled 4 villages Bypass is the best option. It is hoped that, should this project be given the green light, that the money set aside for the 2-village bypass by EDF can be added to government funding and the project will be complete in time for Sizewell C Construction. If this is not the case and the 2 village bypass proceeds, then there are significant issues with the current design.

19.2. The southern junction should be moved to the south by a few hundred meters to incorporate Tinker Brook road into the roundabout. If this is not done traffic turning in and out of this road could cause significant delay.

19.3. It seems that Walk Barn Farm has been completely cut off by the proposed bypass route.

20. Transport: road improvements

20.1. The road improvements suggested are generally supported. However, it is requested that when these improvements are finally designed that they will include provision for cyclists. It is very surprising that no improvements have been suggested for Coddenham as this location is currently extremely congested. Our comments regarding the Wickham Market diversion are given in paragraph 18.

21. Consultation process

21.1. We share the concerns of many other parties that that EDF are undergoing what may be the final round of consultation before submission of the Development Consent Order to the Planning Inspectorate. There seem to be so many issues that would benefit from a further round of consultation. We urge EDF to provide significantly more detail and solutions to the issues raised by our WMPC and many other parties and enter into a fourth stage of project consultation prior to the final DCO submission.

R J Jenkinson
Chairman
Wickham Market Parish Council

YOXFORD PARISH COUNCIL

Mrs Sharon Smith
Arbour House
Rectory Road
Middleton
Suffolk
IP17 3NP
01728 648576
parishclerkyoxford@gmail.com

Ms Gail Boyle
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

20th June 2019

Dear Ms Boyle

Response to EN010012 – Sizewell C – EIA Scoping Notification and Consultation

Yoxford Parish Council has serious concerns about the Environmental Impact Assessment Scoping Report submitted by EDF Energy for a Scoping Opinion from the Planning Inspectorate for the proposed development of Sizewell C Nuclear Power Station.

It is clear that the Scoping Report has taken no account of the very considerable observations and objections submitted by County, District, Town and Parish Councils and individuals to EDF's proposals in its stage 3 consultation. There is so much in dispute on the EDF plan that we do not consider that a valid Scoping Opinion can be made at this stage or until the concerns arising from the stage 3 consultation are addressed. These controversial issues and the consequent environmental impacts have been addressed in detail by submissions to you from Theberton and Eastbridge Parish Council, Middleton cum Fordley Parish Council and the RSPB which we have studied in detail and support unequivocally. Furthermore, we have been given no evidence that EDF have completed the necessary modelling, assessments and mitigation which are of particular importance because the proposed site is in an AONB and SSSI and especially vulnerable.

We are particularly concerned that EDF's submission states (in paragraph 4.1.3) that alternative sites will not be considered. This is unacceptable because, of the other potential sites identified in NPS EN-6, Sizewell has already been identified as having the greatest environmental impact and yet the alternative sites, with the exception of Hinkley Point C, are not being developed. These alternative sites now need to be reconsidered rather than to proceed with the attempt to cram two reactors into a very limited site, which EDF themselves admit is too small, and which will have a devastating impact on the surrounding area as identified in the last round of consultation.

Yoxford is, at present, the transport hub for the whole Sizewell C project; all traffic from the North and South on the A12 and the West on the A1120 converge at Yoxford. We are particularly concerned that this Scoping Report was drafted at precisely the same time as the stage 3 consultation and therefore takes no account of the considerable concerns raised about the construction traffic. It is yet another indication of EDF's dismissive attitude to residents and consultees.

Moreover, we believe that should further changes be needed in EDF's proposals, this Scoping Report would not stand and a new Scoping Report and Opinion will be required.

Yours sincerely
Sharon Smith
Clerk to Yoxford Parish Council