



The Sizewell C Project

5.1 Consultation Report Addendum - Annex A: Unredacted Statutory Consultee Responses

Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

February 2021

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009





Consultation on proposed changes

Your details

Name

Nina Robinson

Email

Address

Are you responding on behalf of an organisation?

Yes

No X

If so, which?

Job title

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

- 1a a) Support the DCO application approach.

Yes

No X
- 1b b) Support moving more material by rail.

Yes X

No
- 1c c) Support moving more material by sea.

Yes X

No

1f Please explain your views, specifying the potential change to which your comments refer.
100% of materials to be transported by rail and sea

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

2f Please explain your views.

No night trains; use sea instead

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate X

Inappropriate

Don't know

3f Please explain your views.

As long as concealed

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate X

Inappropriate

Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate X

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Full protection against pollution of sea and protection of all wildlife

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

6f Please explain your views.

Bridge very bad impact on environment

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

7f Please explain your views.

No loss

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Wetland habitats preserved

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate X Inappropriate Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate X Inappropriate Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate X Inappropriate Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate Inappropriate X Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:
Appropriate X Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Reduce all impact on Yoxford and villages and much more traffic by sea

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Consultation on proposed changes

Your details

Name

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Email

[Redacted email address]

Address

[Redacted address]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

The Heveningham Hall Estate

Job title

Senior Associate

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☒

1b b) Support moving more material by rail.

Yes ☒ No ☐

1c c) Support moving more material by sea.

Yes ☒ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

The DCO included insufficient information to fully assess the appropriateness of the rail and marine strategies and it appeared that the latter especially was not adequately exploited. We note that "In principle, it may be possible to increase the proportion of construction materials moved by rail and sea from 40% to 60%" (§2.2.20 of the Consultation report). A more intensive use of these two modes is welcomed as they would reduce HGV movements on the road network. The Transport Assessment should be reviewed and, particularly, the impact assessment and associated mitigation schemes revisited. The need for the mitigation scheme at the Yoxford roundabout should be justified, in terms of scale, as it may be that a

smaller roundabout would be sufficient. The impact on AILs should also be clarified and the need for over-runnable islands at the Yoxford roundabout should similarly be justified.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate X Inappropriate Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate X Inappropriate Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate Inappropriate Don't know X

2f Please explain your views.

The highest number of trains possible should be employed in the freight management strategy to reduce impact on the road network. Movements overnight are preferred to those on daytime in order to minimise any impact to passenger trains. We still note that “It is possible that this work could conclude that the additional train capacity cannot be delivered” (§2.2.13 of the Consultation report). We consider that a higher reliance on freight movement by train is essential.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate X Inappropriate Don't know

3f Please explain your views.

In the DCO, the BLF was not fully exploited and we consider that the proposed changes would contribute reducing the impact on the road network. We consider it would be important for the BLF to be designed to also accommodate Abnormal Indivisible Loads (AILs), to remove the associated vehicular movements from the road network.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate X Inappropriate Don't know

4f Please explain your views.

In the DCO, the BLF was not fully exploited and we consider that the proposed temporary facility would contribute reducing the impact on the road network. We consider it would be important for the temporary BLF to be designed to also accommodate Abnormal Indivisible Loads (AILs), to remove the associated vehicular movements from the road network.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate Inappropriate X Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate Inappropriate X Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate Inappropriate X Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate X Inappropriate Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

We consider that the marine strategy should be exploited as much as possible. The highest capacity provision should be chosen, also accommodating Abnormal Indivisible Loads (ALLs) and remove them from the roads. Given the identified risk of potential for adverse effects to arise to a number of ecological receptors, however, full and detailed consideration will be required.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate Inappropriate Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

7f Please explain your views.

In principle, the delivery of additional compensatory fen meadow habitat is positive; however significant work would be required to demonstrate not only that the creation of new areas of fen meadow habitats will be viable and deliverable in this location, but that this is relevant and proportionate for identified adverse impacts to a SSSI arising from the DCO application, with the SZC main site located over 50km away from the additional fen meadow site.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

It is essential that both the design and the long-term use of this area must be directly linked to specific ecological aims and objectives, derived through an assessment of potential effects, rather than be identified through consultation with stakeholders as to what effects they believe this needs to mitigate or compensate for.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

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We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

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Appropriate

Inappropriate

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10d Do you think this potential change is:
☐ Appropriate ☐ Inappropriate ☐ Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:
☐ Appropriate ☐ Inappropriate ☐ Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
☐ Appropriate ☐ Inappropriate ☐ Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
☐ Appropriate ☐ Inappropriate ☐ Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
☒ Appropriate X ☐ Inappropriate ☐ Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate X Inappropriate Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Re. Reduction in land required We support the reduction in land required for the DCO but also note that it would make very little difference. The scale of the Yoxford roundabout should be justified – for example whether a smaller roundabout could be sufficient to offset the impact of the development. Similarly, the need for a 1,250-space P&R at Darsham should be justified, as it appears, having reviewed the Transport Assessment and supporting Technical Notes, that the northern catchment is smaller than the southern one, so it does not follow that they should be the same size. We note that Figure 2.4 now shows a route for AILs through the access roundabout of the northern P&R. This was not shown in any of the Plans for Approval included in the DCO. We also think that an assessment of the impact at the Darsham level crossing should be undertaken.

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Consultation on proposed changes

Your details

Name

Tim West

Email

Address

Are you responding on behalf of an organisation?

Yes X

No

If so, which?

Robert Wynn & Sons Ltd

Job title

Company Secretary

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

- 1a a) Support the DCO application approach.

Yes X

No
- 1b b) Support moving more material by rail.

Yes X

No
- 1c c) Support moving more material by sea.

Yes X

No

1f Please explain your views, specifying the potential change to which your comments refer.

Making use of Rail and Sea for the movement of freight should be applauded. The maximising the use of sustainable transport modes for major infrastructure projects such as this should be a prerequisite to permission being granted.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate

Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate

Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate

Don't know

2f Please explain your views.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate X

Inappropriate

Don't know

3f Please explain your views.

The movement of the largest and heaviest abnormal loads by road can create major challenges and significant disruption to local communities. We would like to support the thinking behind the creation of the BLF and hope that the use of the facility will be maximised through teh whole life cycle of Sizewell C. We would ask if there are plans to make it available to Sizewell B and also if consideration is being given to 3rd party use. With the development of marine and wind power in the north sea there may well be opportunities that require shore based infrastructure, such as large substations) that could be served via the BLF. We would ask for early engagement with both Highways England (who administer the governments abnormal load policy and permit system) and those within industries such as power generation and specialist shipping (such as ourselves) to ensure that the BLF is developed mindful of a wide range of future use. Having a strategic site at Sizewell can only be a good thing for UK PLC.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate X

Inappropriate

Don't know

4f Please explain your views.

Delivering bulk materials via marine infrastructure such as the proposed temporary beach landing facility should be supported. The opportunity for direct delivery to site via water based transport should be maximised.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Sharon Smith

Email

[Redacted email address]

Address

[Redacted address]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Peasenhall Parish Council

Job title

Parish Clerk

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☒

1b b) Support moving more material by rail.

Yes ☒ No ☐

1c c) Support moving more material by sea.

Yes ☒ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:
Appropriate X Inappropriate Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:
Appropriate X Inappropriate Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:
Appropriate X Inappropriate Don't know

2f Please explain your views.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:
Appropriate X Inappropriate Don't know

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:
Appropriate X Inappropriate Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:
Appropriate Inappropriate Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate X

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate X

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Angie Buggs

Email

Address

Are you responding on behalf of an organisation?

Yes X No

If so, which?

Job title

Clerk/RFO

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes X No

1b b) Support moving more material by rail.

Yes X No

1c c) Support moving more material by sea.

Yes X No

1f Please explain your views, specifying the potential change to which your comments refer.

The Group Parish Council welcomes the changes proposed to the original application and the associated further period of Public Consultation. We particularly welcome the proposed changes to the traffic plan which will see an increased amount of material being moved by sea and rail and a reduction in HGV movements. However, we do not feel that these have gone far enough. An average of 500 two-way movements and up to 700 two-way movements is to many for the existing road network and is very environmentally damaging. Therefore, we would like you to continue and intensify your talks with Network Rail to increase the number of rail movements including running trains six days a week (as happens on the Felixstowe Branch). We are aware of the noise concerns and overnight deliveries should not be excessive, but rail is much more environmentally friendly than

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate X

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

2f Please explain your views.

However, we do not feel that these have gone far enough. An average of 500 two-way movements and up to 700 two-way movements is to many for the existing road network and is very environmentally damaging. Therefore, we would like you to continue and intensify your talks with Network Rail to increase the number of rail movements including running trains six days a week (as happens on the Felixstowe Branch). We are aware of the noise concerns and overnight deliveries should not be excessive, but rail is much more environmentally friendly than road transport.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate

Inappropriate X

Don't know

3f Please explain your views.

We also welcome your efforts in extending the use of sea transport to deliver an increased amount of heavy material to the beach.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate

Inappropriate

Don't know X

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

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Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

6f Please explain your views.

The Group Parish Council is yet to be persuaded of the economic benefit of Sizewell C against the environmental damage it's construction will cause. Therefore, we await the outcome of your talks with the Government about how the project is to be funded in the future.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

7f Please explain your views.

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8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

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9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

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10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

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Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Roger Blake

Email

[Redacted]

Address

[Redacted]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Railfuture Ltd

Job title

Director for Infrastructure and Networks

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☒

1b b) Support moving more material by rail.

Yes ☒ No ☐

1c c) Support moving more material by sea.

Yes ☒ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

a) The application approach places to greater reliance on HGV movements by road b) This would reduce reliance upon road movements to service the site and if accompanied by additional investment to increase the capability/capacity of the East Suffolk Line would leave a lasting 'legacy benefit' to develop the line for enhanced passenger services c) While supporting the case for greater use of rail we would support greater transportation of material by sea in addition to making better use of rail as taken in combination, they would minimise reliance on road transport

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate X Inappropriate Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate X Inappropriate Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate X Inappropriate Don't know

2f Please explain your views.

Our response is without prejudice to our submission to the Planning Inspectorate. From the limited choice presented by this style of consultation we are generally in favour of all options which avoid the use of HGVs where possible and maximise the use of alternatives, particularly rail. We are disappointed to note that there is no firm commitment on the part of EDF to increase the use of rail, only a statement of 'desire' so to do. We are not yet convinced that the option of creating even greater capacity for rail has been fully explored. The provision of a passing loop between Woodbridge and Saxmundam, as an absolute minimum, would permit more trains to serve the construction site without the restrictions imposed by the present infrastructure. We regret that EDF have not provided any indication as to the costs of the Enhanced Permanent Beach Landing Facility (BLF) nor of the temporary additional BLF, giving us no opportunity to comment upon the relative benefit/cost ratio of these amended proposals. We are therefore unable to evaluate the relative merits of the 'More materials by Sea' option against the costs of providing increased capacity on the East Suffolk 'main line'. If EDF have a genuine interest in leaving a legacy benefit to the local community, we would much prefer there to be investment in additional capacity on the local rail network rather than on a marine landing facility which is of use only to EDF and for a limited period.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate Inappropriate Don't know X

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate Inappropriate Don't know X

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know X

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know

Inappropriate X

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Pat Hogan

Email

Address

Are you responding on behalf of an organisation?

Yes X

No

If so, which?

Sizewell Residents Association

Job title

Representative on Stakeholder Group

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes

No X

1b b) Support moving more material by rail.

Yes X

No

1c c) Support moving more material by sea.

Yes X

No

1f Please explain your views, specifying the potential change to which your comments refer.

We always understood that as much as possible would be brought in by rail and by sea as many of our roads are country roads and we like them as such, and while there will still be massive road intrusion the proposals will ease some of the strain on villages around...unfortunately not Sizewell itself and residents remain hugely concerned about the use of 'Gap' Road as the one and only access point for ALL construction/personnel traffic during the first phase of construction - this reckoned to be 18 months plus. We have stressed many times how we feel we should not be expected to bear this, and still feel that health and safety/ emergency procedures requirements should forbid this, given existing essential use of this road for all

residents and visitors, as well as A and B stations, outages, Galloper/Gabbard etc. , and the prospect of SPR traffic etc..Having now received your latest figures on expected movements for this part of the road we are even more upset with this aspect of your plans.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate X Inappropriate Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate X Inappropriate Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate Inappropriate X Don't know

2f Please explain your views.

Though we would wish construction to be completed in the shortest time possible it is a balancing act between hurry v. excessive impingement on quality of life, and c) is an unnecessary step too far. Living so close to the construction area will be a trial for all of us, so the limits of working hours/days are very important. There should be no carte-blanche situation re extra trains, extra hours, extra night work, extra disruption.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate X Inappropriate Don't know

3f Please explain your views.

The existing plans involve huge intrusion to the beach area anyway, and to the marine environment/ seabed/ fishing space so it seems sensible to maximise the use of the facility, providing always that good arrangements have already been put in place for communication/ consultation/ consideration of local residents/ fishermen etc.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate X Inappropriate Don't know

4f Please explain your views.

As above, the intrusion to the beach area and marine area are planned to happen, so again maximum use of the intrusion makes sense providing always again that the balancing act between haste of construction versus quality of life for residents/ users has been well considered to agreement.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:
Appropriate Inappropriate X Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:
Appropriate Inappropriate X Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:
Appropriate X Inappropriate Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:
Appropriate X Inappropriate Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Options 1 and 2 seem like half a help for construction purposes and seem to involve regular dredging operations, which would likely upset a larger area of fishing/potting space with sediment disturbance etc. On balance options 3 or 4 seem preferable, but of course with good local agreement in place for hours /days of working to limit noise, light, vibration intrusion. When B station was being built for example limits were set on hours for pile-driving and this was extremely helpful. We understand that the aspects of loss of /disturbance to fishing grounds will be discussed to agreement prior to any work commencing. We are aware too that you will address any adverse effects on the coastline/erosion/flooding aspects etc. We have previously raised aspects of concern regarding beach access, maintaining footpaths etc and are reassured that you are aware of these concerns.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:
Appropriate X Inappropriate Don't know

6f Please explain your views.

This seems to offer better screening and improved water management.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:
Appropriate Inappropriate Don't know X

7f Please explain your views.

It seems that much replacement area has already been provided, and in places more relevant to the intrusion area.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:
Appropriate Inappropriate Don't know X

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:
Appropriate X Inappropriate Don't know

9f Please explain your views.

As long as this does not disrupt walkers, and eases footpath flooding locally.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:
Appropriate X Inappropriate Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:
Appropriate X Inappropriate Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:
Appropriate X Inappropriate Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Concern has been expressed regarding the bridle way crossing the road and it may be that some traffic control measures such as traffic lights would help to reduce danger.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Use of Sizewell A land is entirely appropriate and much more desirable than use of pillbox field, and we would very much welcome this as Pillbox field is important to local people and we would not wish to see cars parked on it, nor using Sandy Lane. It is a buffer between leisure and industry and we would very much hope that this can continue to be the case. The additional screening would help this too.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate X Inappropriate Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:
Appropriate X Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Lisa Evans

Email

Address

Are you responding on behalf of an organisation?

Yes XNo

If so, which?

Ipswich Borough Council

Job title

Principal Planning Officer - Special Projects

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

YesNo

1b b) Support moving more material by rail.

Yes XNo

1c c) Support moving more material by sea.

YesNo

1f Please explain your views, specifying the potential change to which your comments refer.

IBC consider that any increase in freight movements above those proposed within the DCO need to be balanced with ensuring no adverse harm on the amenities of those existing and future residents (from new developments). Any increase in freight movements which have the potential reduce passenger trains along the East Suffolk Line is a concern as this could be to the detriment of sustainability with the reduction to a sustainable mode of transport being available to residents of Ipswich and in particular the impact upon the Ipswich Garden Suburb Local Plan allocation. This would need to be considered and assessed as part of any amendments to the DCO.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate

Don't know X
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate

Don't know X
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

2f Please explain your views.

Any amendments to the DCO application that increase the number of freight movements to those already within the submission must have proper regards to the impact upon those existing occupants along the East Suffolk Line and to the potential impact upon the Ipswich Local Plan allocation for the Ipswich Garden Suburb (3,500 dwellings) with particular reference being made to potential added noise and disturbance and air quality. Further Environmental Work should form part of any amendments to the DCO. IBC wish to highlight that a passing loop between Woodbridge and Samundham would increase flexibility to run additional freight movements. IBC are concerned over the potential reduction in any passenger trains along the East Suffolk Line which could be to the detriment of sustainability with the reduction to a sustainable mode of transport being available to residents of Ipswich and in particular the impact upon the Ipswich Garden Suburb allocation.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate

Inappropriate

Don't know

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate

Inappropriate

Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:
Appropriate Inappropriate Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate Inappropriate Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate Inappropriate Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate Inappropriate Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate Inappropriate Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:
Appropriate Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Sasha Ayres

Email

Address

Are you responding on behalf of an organisation?

Yes XNo

If so, which?

Mollett's Partnership

Job title

Partner

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

YesNo X

1b b) Support moving more material by rail.

Yes XNo

1c c) Support moving more material by sea.

Yes XNo

1f Please explain your views, specifying the potential change to which your comments refer.

As consistently stated in our responses to earlier consultations, we fully support measures to use sea and rail to reduce the volume of materials being transported by road.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate X

Inappropriate

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate X

Inappropriate

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

2f Please explain your views.

Whilst we supportive of the general approach to increase the use of rail, we are disappointed that more effort has not gone into increasing overall rail capacity through the timely construction of passing loops.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate X

Inappropriate

Don't know

3f Please explain your views.

As consistently stated in our responses to earlier consultations, we fully support measures to use sea and rail to reduce the volume of materials being transported by road.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate X

Inappropriate

Don't know

4f Please explain your views.

As consistently stated in our responses to earlier consultations, we fully support measures to use sea and rail to reduce the volume of materials being transported by road.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate X

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

As consistently stated in our responses to earlier consultations, we fully support measures to use sea and rail to reduce the volume of materials being transported by road.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

6f Please explain your views.

Anything that minimises the heinous effects of this project on supposedly protected areas and RSPB Minsmere in particular are welcomed.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

7f Please explain your views.

Whilst we find the destruction of any natural habitat inappropriate - particularly in areas that are supposed to have statutory legal protection - we are supportive of habitat creation elsewhere. Whether this can ever be considered as adequate replacement for the lost habitat is debatable.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

The decision for the long-term use of this area should be guided by conservation bodies.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

11f Please explain your views. Please specify the option to which your comments refer.

The minimum amount of greenfield land should be used for this development and the use of existing brownfield land is welcome.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know X

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Yet again – an opportunity lost! EDF Energy have once again missed an opportunity to demonstrate that they are acting on or even listening to the views of those affected by their Two Village Bypass proposals. As members of FERN we fully endorse their submission (under separate cover), but also feel the need to submit separately due to additional factors concerning ourselves and our business.

a. Lack of Detail – There is still a fundamental lack of detail, which has compromised our ability to make a reasonable assessment of your proposals and to judge if they are suitable or not. Proceeding to a formal DCO application prior to providing such detail and allowing those affected to respond has seriously undermined the credibility of your consultation process. It has also blighted our business and prevented us from moving forward, given the uncertainty of the situation you have put us in.

b. Proximity – A new single-carriageway road running along the indicated alignment will bring the edge of the A12 to within 150m of our farmhouse and private gardens, and 50m of our paddocks. This is unacceptably close and will have a significantly negative impact on our family, guests, business, land-use and property value. Despite consistent representations from our two parish councils, County Councillor, neighbouring properties and neighbouring businesses, no re-assessment of EDF's poor choice of Two Village Bypass route has been offered; despite the many and clear advantages of an alternative to the east of Foxburrow Wood being highlighted. We therefore continue to fully support the proposal to re-route the Two Village Bypass through the gap between Foxburrow Wood and Palant's Grove, based on the greater good it will serve. The shallower ground levels would also allow road construction with smaller gradients, thereby keeping vehicle-derived noise and air pollution down.

c. Speed Limit – We are wholly opposed to a 60 mph speed limit being introduced on the new bypass. The change from 50 mph to 60 mph will mean noise levels experienced here will greatly increase, especially taking into the direction of the prevailing wind. Vehicles accelerating and going through the gears to and away from the roundabouts on the A12 (especially heavy lorries) will add significantly to noise and pollution. We have not had a satisfactory explanation about the noise and pollution impact on our particular property nor, therefore, adequate information about potential mitigation.

d. Noise and Vibration – Modelling in earlier bypass reports assessed that several properties along the proposed alignment – including our own – will experience noise levels in the “red” zone, which is detrimental to an extent that is considered hazardous to health and well-being. Again there has been no response to our concerns on these issues. Indeed we have been designated as “not significantly impacted” without any survey or documentation to support this complete U-turn from previously assessed information. We have asked again and again for noise reduction measures such as low noise road surfacing and noise attenuation fencing / bunding, especially as the proposed bunding is so low as it comes past us, as to be completely ineffectual. Again, this has fallen on deaf ears.

e. Air Quality – The consultation process has acknowledged that such a bypass would increase levels of NOx (oxides of nitrogen) and carbon emissions, which will adversely affect properties along the proposed alignment. What measures will be taken to eliminate or mitigate these effects or compensate for them? Again, we would suggest that the easterly route alignment would be much more appropriate. And again we would ask for proper documentation, surveys, etc.

f. Light Pollution – We are concerned that 24x7 lighting of the proposed roundabout at Friday Street will lead to light pollution and cause a loss of the dark sky views that can currently be obtained here. Such things enrich our lives and bring pleasure to those visiting (often from more built up areas) and would be shame to destroy. Lighting design should be used to minimise the effects of any mandatory lighting beyond the roundabout surface itself. Again, there has been no response to our concerns.

g. Wildlife – By creating a new physical barrier, the proposed route will sever and disrupt established wildlife corridors connecting multiple habitats. These routes are known (and documented) to be extensively used by Muntjac, Red Deer, Roe Deer, Fallow Deer, Red Fox, Brown Hare, Badger and Hedgehogs. Construction will also destroy land, hedgerows and mature trees actively supporting Harvest Mouse, Wood Mouse, Field Vole, Common Shrew, Grey Squirrel, Weasel, Stoat, Skylark, Meadow Pipit, Barn Owl, Tawny Owl, Little Owl, Shelduck, Kestrel and Common Buzzard. Many of the above listed species are recognised as being in national decline, with ever-decreasing habitat.

h. Agriculture – As well as the loss of productive farmland due to the new road's footprint (and associated works), the proposed route will also sub-divide existing parcels with the effect that they will become either physically inaccessible or uneconomic to farm. Future access would also require rights of way which do not currently exist; the destruction of hedges; and/or the bridging of water courses. If this project nonetheless proceeds, we would like to see annexed land parcels used constructively and sensitively to create both visual-impact and noise-abating buffers between the new road and affected households and businesses. As yet we have still had no response to our concerns nor can we see any details addressing them in the DCO submission or this consultation.

i. Environment – The proposed route (and associated works) will be within close proximity of several ponds (and therefore neighbouring countryside) known to support Newts, Frogs, Toads, Rudd, Mallard, Moorhen, Dragonflies, Darters, Grass Snakes and Bats. As well as ground water contamination, we are also concerned about disturbance of ground water levels – which our ponds follow and are therefore dependent upon. Again no details have been provided, nor surveys carried out to assess the impact on us.

j. Drainage – The proposed route crosses a drainage ditch carrying surface water from much of Mollett's Farm (and other arable land to the east) towards Friday Street. Parts of the proposed route and adjacent land are already subject to flooding and run-off during severe weather events. But yet again, there are no details or responses to our many concerns as to how this will affect us.

k. Irrigation – Water that is essential for the irrigation of certain crops at Mollett's Farm is pumped overland from stored and bore-hole derived sources at Friday Street. The crops that require this water perform an important role in both the health of the arable land (being a break crop in the farming rotation) and in the income derived from it. Severing this facility would cause financial hardship - requiring mitigation. But no one will respond to our concerns nor is there anything in the DCO application or this consultation.

l. Access – Land at Mollett's Farm benefits from an historic right of way to Friday Street, which the proposed route will sever. This and other permissions (including a Public Right of Way) allow ourselves, our guests and walkers from the direction of Farnham to access the Friday Street farm shop, butchers, fishmonger, antiques centre, café restaurant and car-boot sale. Aside from any legal issues, the loss of this route would have a material effect on the attractiveness of our tourism business, as it connects our self-catering and caravan site visitors with local shops and services. This route is also used by agricultural vehicles moving between land parcels. Suggesting that the route will still exist across the new road is ludicrous at best, as pedestrians and high-speed vehicles do not mix well. Given the proposed traffic flows and speeds it would be highly dangerous to cross the bypass, if indeed possible at all.

m. Rights of Way – The proposed route severs two other well-used footpaths between Farnham village and the ancient woodland at Foxburrow Wood (known locally as the “bluebell wood”, on account of its prolific display each spring). As well as being Public Rights of Way, they also connect walkers to the Greenwood burial ground, Snape and unspoilt countryside beyond. The one passing between Farnham Hall and Farnham Hall Farmhouse also carries both private and agricultural traffic. The mitigation proposed is woefully inadequate. On the specific question of re-routing the PRow footpaths near Walk Barn Farm, the SCC-proposed Option 1 makes sense – particularly given the historically poor directional signage in this area. Should a wider consensus be reached that a larger deviation from the current PRow route is acceptable, then Option 2a would be preferable. In either case, we would urge the County Council and landowner to improve the PRow signage in this area. Despite being horse owners ourselves, we cannot support the proposed footpath-to-bridleway upgrade as it stands. The current proposals are dangerous and inadequate.

n. Tourism – Tourism in Suffolk is worth an estimated £1.85bn per annum and is said to account for 13% of all employment. East Suffolk Council estimated 2019 tourism spend as £211.70 per person and we currently bring 1,000 guests a year to the area. Their tourism business plan for 2017-22 found visitors were attracted by the character, culture, festivals, music, art, food, drink, clean beaches and spectacular coastline. We are concerned about the inevitable disruption our tourism business will suffer during bypass and Sizewell C construction, as well as the impact of

other traffic increases encouraged by an upgraded road infrastructure. It is widely acknowledged that the quiet, rural nature of Suffolk is intrinsic to its tourism industry, which is significant in value. These characteristics and the unspoilt landscape immediately around us are fundamental to our business and would be seriously affected by the additional traffic Sizewell C would create and, specifically, by this bypass. Even if we had the opportunity to accept workers to take up accommodation, it is at significantly lower rates and with higher wear and tear – this would make our business unviable as the levels offered are not even enough to cover our costs. There is no doubt that tourists would not come and even if they did the detrimental effects of poor reviews (based on noise and disturbance) would decimate our business and the reputation we currently enjoy.

o. Construction – Inadequate information has been provided about the adverse effect of this road's construction – such as noise, vibration, dust, light pollution, contamination, traffic disruption, temporary loss of access – or on its mitigation. EDF's proposed construction compound at Friday Street also appears unacceptably close to the two Stockhouse Cottages, The Old Police House and ourselves. These factors cannot be ignored, should be minimised and must also receive careful consideration before accepting such a scheme. Building this bypass as well as the power station itself is likely to make our business totally unviable. The inevitable noise and disruption is set to completely devastate our livelihood, yet in your proposals you fail to address any of our concerns or even respond to our issues.

p. Compensation – What measures will you put in place to provide legal support and/or compensation for those homes, businesses and land owners disadvantaged by your proposals and activities? Currently your plans show none, as we are not within your red line development boundary.

q. Failure to Acknowledge our very Existence – We are constantly overlooked on your plans. Not even being designated as an inhabited property, let alone a business.

r. Failure to Consult – We are already blighted by your plans which are putting us in limbo until a decision is made as, obviously, we cannot continue to proceed with our own business plan and further invest in our business as your proposals might make it totally redundant. Despite numerous attempts to engage with EDF, there has been little to no communication or acknowledgement that we even exist. We have in effect the "Sword of Damocles" hanging over our business. We have been unable to progress our business as we would have wished because of the uncertainty. We have planning permissions to add further accommodation and to develop our barn complex, but have been unable to act on these because of the uncertainty, which could make such an investment potentially ruinous should the bypass go ahead. So, yet again we do our part and respond to you in the ever-increasing knowledge that a response or even acknowledgement is far from certain. The triumph of hope over experience, if you like. We even find ourselves wondering if anyone even reads these or if it is just another tick-box exercise for you.

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Consultation on proposed changes

Your details

Name

Caroline Emeny

Email

[Redacted email address]

Address

[Redacted address]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Great Glemham Parish Council

Job title

Parish Clerk

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☐

1b b) Support moving more material by rail.

Yes ☐ No ☐

1c c) Support moving more material by sea.

Yes ☐ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate

Don't know
- 2f

Please explain your views.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate

Inappropriate

Don't know

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate

Inappropriate

Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

- 5a

Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate Inappropriate Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate Inappropriate Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate Inappropriate Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate Inappropriate Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:
Appropriate X Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Great Glemham Parish Council would like to register their support for the proposed landscaping bund at the Hacheston Park & Ride site. However we do remain disappointed that there has been no engagement regarding the traffic management protocols that will need to form an integral part of any development consent order to prevent rat-running to the two park & ride sites (which will not be subject to monitoring by EDF) and regarding convoy times, particular from Hacheston to Sizewell.

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Consultation on proposed changes

Your details

Name

Sandra Brown

Email

[Redacted email address]

Address

[Redacted address]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Pakenham Parish Council

Job title

Parish Clerk

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☐

1b b) Support moving more material by rail.

Yes ☐ No ☐

1c c) Support moving more material by sea.

Yes ☐ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate Inappropriate Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate Inappropriate Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate Inappropriate Don't know

2f Please explain your views.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate Inappropriate Don't know

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate Inappropriate Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate Inappropriate Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate Inappropriate Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate Inappropriate Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate Inappropriate Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate Inappropriate Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:
Appropriate Don't know Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Sizewell C consultation – Pakenham Parish Council's comments in relation to the possible purchase of land re Fen Meadows within Pakenham. If EDF Power Station at Sizewell C does go ahead and the land at Pakenham is obtained the Parish Council would like these questions answered to inform the residents of Pakenham: I. What is the proposed timescale for this (start to finish)? II. Who will ultimately own the land and will this organisation be legally separate from EDF and a charity? III. Will a member of Pakenham Parish Council be invited to sit on the board of Charity as a representative of the village? IV. Will this land be open to access by the general public in perpetuity? V. Currently footpath no.3 runs through this area, will this footpath be retained and raised on duck boards. VI. Will there be further footpaths created across the new Fenland, if so, where would the access be and will these footpaths be raised on duckboards. VII. Will there be an opportunity for Pakenham Parish Council to agree the location of new footpaths? VIII. Does this Plan have the approval of Natural England who are Guardians of the existing SSSI meadow? IX. Will any changes to the Land Hydrology on the other side of the Mill Stream have any adverse effect on the existing SSSI meadow? X. It appears that the boundary of the new Fenland follows the route of Pakenham stream, how will this impact on the flow of the stream and in turn the listed Pakenham Water Mill. XI. How will the organisation managing the new Fenland maintain the stream? XII. Pakenham Parish Council are concerned about the about the affect on the stream, has this been modelled and studied in depth to avoid any problems in the future with the operation of the Water Mill. XIII. Will this

proposal have an impact beyond the immediate area and have an effect on the wider area including water levels. How will this be monitored and controlled, will there be any effect on homes and gardens. XIV. Pakenham Parish Council would like to be included as an interested party on future discussions for this site.

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Consultation on proposed changes

Your details

Name

Jane Taylor

Email

Address

Suffolk and North East Essex Clinical Commissioning Groups, Aspen House, Stephenson Road, Severalls Business Park, Colchester, CO4 9QR

Are you responding on behalf of an organisation?

Yes XNo

If so, which?

North East Essex Clinical Commissioning Group, Ipswich and East Suffolk Clinical Commissioning Group, West Suffolk Commissioning Group

Job title

Senior Estates Development Manager

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes XNo

1b b) Support moving more material by rail.

Yes XNo

1c c) Support moving more material by sea.

Yes XNo

1f Please explain your views, specifying the potential change to which your comments refer.

Whilst there are concerns relating to the impact on environment and sustainability moving forward with this proposed change to moving construction material for Sizewell C the impact on the overall health system will reduce and therefore the Health System is broadly supportive of the proposed change.

Question 2: Increased frequency of train movements

<https://magpieportal.traverse.org.uk/#/print/reports/printable-response/7d857e92-e03e-4299-a212-427cbebdb121>

1/6

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate ☒ Inappropriate ☐ Don't know ☐

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate ☒ Inappropriate ☐ Don't know ☐

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate ☐ Inappropriate ☐ Don't know ☒

2f Please explain your views.

In order to reduce construction traffic off the road, this proposal is supported in principle. The change in passenger timetable on the East Suffolk Line cannot be commented on at this time without sufficient detail of the impact

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate ☒ Inappropriate ☐ Don't know ☐

3f Please explain your views.

Whilst there are concerns relating to the impact on environment and sustainability moving forward with this proposed change to moving construction material for Sizewell C the impact on the overall health system will reduce and therefore the Health System is broadly supportive of the proposed change.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate ☒ Inappropriate ☐ Don't know ☐

4f Please explain your views.

Whilst there are concerns relating to the impact on environment and sustainability moving forward with this proposed change to moving construction material for Sizewell C the impact on the overall health system will reduce and therefore the Health System is broadly supportive of the proposed change.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate X

Inappropriate

Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

All options are broadly supported and welcomed. Further impact on environment and sustainability currently unknown

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

6f Please explain your views.

Broadly supported

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

7f Please explain your views.

Broadly supported

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:
Appropriate X Inappropriate Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.
Broadly supported

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:
Appropriate X Inappropriate Don't know

9f Please explain your views.
Broadly supported

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:
Appropriate X Inappropriate Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:
Appropriate X Inappropriate Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:
Appropriate X Inappropriate Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:
Appropriate X Inappropriate Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

All of the above elements of the proposal are broadly supported, whilst there are concerns relating to the impact on environment and sustainability moving forward with this proposed change to moving construction material for Sizewell C the impact on the overall health system will reduce and therefore the Health System is broadly supportive of the proposed change.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Broadly Support

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate X

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

Broadly support

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Consultation on proposed changes

Your details

Name

Michael A Stevenson

Email

Address

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Rendlesham Parish Council

Job title

Council Chairman

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

- 1a a) Support the DCO application approach.

Yes ☒ No ☐
- 1b b) Support moving more material by rail.

Yes ☒ No ☐
- 1c c) Support moving more material by sea.

Yes ☒ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

2b b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

2c c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

2f Please explain your views.

In respect of “Increase in the frequency of freight train movements to facilitate bulk material imports by rail” the response from RPC is:- “As most of these lorries will come via A 14/A12 and pass Martlesham Woodbridge (and impact traffic on A12 used by Rendlesham commuters/Schools etc and also the tourist traffic which already chokes at Martlesham and South of Woodbridge), RPC support the additional days rail use (proposed in para 3.2.6) and support the further development and investigation to continue the 'expansion of capacity' of this means of access to the development”

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a Do you think enhancing the permanent BLF is:

Appropriate

Inappropriate X

Don't know

3f Please explain your views.

In respect of “Enhanced permanent beach landing facility RPC see no benefit to the enhancement of the permanent Beach landing facility as we cannot understand the additional AIL's identified now that were not previously identified in EdF Planning for then original DCO.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a Do you think providing a new, temporary additional BLF is:

Appropriate X

Inappropriate

Don't know

4f Please explain your views.

In respect of options for “a new, temporary facility to import material by sea” RPC see the enhanced high capacity temporary Beach Landing facility as a significant positive development and a welcome revisit to strategy from EdF. The reduction of 1.4m Tonnes (or 75000 wagon loads) per year from roads such as A12 past Woodbridge affords a dramatic reduction in the consequences of SZC construction on our residents and we fully support the construction of such a temporary facility and the optimising of the sea as a delivery route to the development. RPC also note that we expressed our view that “Seaborne landing” was unacceptably rejected by EdF at previous stages in the Consultation process (see our comments on stage 4 consultation).

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:
Appropriate Inappropriate Don't know X

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:
Appropriate Inappropriate Don't know X

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:
Appropriate X Inappropriate Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:
Appropriate X Inappropriate Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

The biggest concern for Rendlesham in respect of this consultation is the HGV traffic and how it impacts the lives of our residents (in the main indirectly at the A12 and the wider arterial roads used by our residents as part of their lives. RPC therefore see “more deliveries by sea as ‘better’ and logically “much more by sea is ‘much better’”. So whilst any increase in seaborne delivery us seen as positive we support the proposals in the priority of the amount actually delivered to the Construction site by sea

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:
Appropriate Inappropriate Don't know X

6f Please explain your views.

This proposed change has no impact on Rendlesham either directly or indirectly therefore RPC have “No Comment” in respect of this proposal.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:
Appropriate Inappropriate Don't know X

7f Please explain your views.

This proposed change has no impact on Rendlesham either directly or indirectly therefore RPC have “No Comment” in respect of this proposal.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

This proposed change has no impact on Rendlesham either directly or indirectly therefore RPC have “No Comment” in respect of this proposal.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

9f Please explain your views.

This proposed change has no impact on Rendlesham either directly or indirectly therefore RPC have “No Comment” in respect of this proposal.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:
Appropriate Inappropriate Don't know X

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:
Appropriate Inappropriate Don't know X

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.
As with other site specific elements these proposals (the short term Construction details and the long term sea defence increases) have no direct effect on Rendlesham and therefore RPC note the proposal but have no specific comment or opinion. In respect of (b) Change to certain parameter heights and activities on the main development site to facilitate the construction process:- RPC note and accept these changes as a consequence of our strong support for the enhanced beach landing facility and increased delivery by sea noted above.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate X Inappropriate Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate Inappropriate Don't know X

11f Please explain your views. Please specify the option to which your comments refer.
The principle of not using Pill Box field and reserving that for new trees to replace Coronation wood is environmentally sound & therefore the intent to seek land agreement with Sizewell A is overall environmentally positive. ... As the proposal has no direct or indirect effect on Rendlesham RPC have no specific comments to make but note that this is a wider "planning" aspect and includes interaction between East Suffolk (as the Local Planning Authority) the DCO process.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate Inappropriate Don't know X

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know

Inappropriate X

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

These Changes relate to minor "Changes to Order limits" etc which are proposed have no significance to Rendlesham and RPC therefore have no substantive comment to make on those matters

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Consultation on proposed changes

Your details

Name

Clerk Mrs Angie Buggs

Email

Address

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Levington and Stratton Hall Parish Council

Job title

Clerk and RFO

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☒ No ☐

1b b) Support moving more material by rail.

Yes ☒ No ☐

1c c) Support moving more material by sea.

Yes ☒ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

1. We welcome the re-consideration of the use of rail and sea transport. 2. We note the assertion that under the new proposals, the proportion of materials that will need to be transported by HGV is estimated as 40% – down from 60%. However, we note that this is qualified as “may be possible” and that it is also influenced by a re-evaluation of the total quantities of materials to be used or re-used. It is hoped further reductions can be made through effective use of alternative rail and sea transportation of materials. 3. We note and welcome the reduction in estimated HGV movements: Peak times Stage 3 1000 Current 700 Typical Day Stage 3 650 Current 500 4. We are disappointed that a similar re-consideration has not been made

<https://magpieportal.traverse.org.uk/#/print/reports/printable-response/2d725ad3-5b27-47f1-880a-59c785df461a>

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of the need for the Facilities Management Facility at Levington, especially in the light of the reduction in estimated HGV movements. We would expect that the need for 150 parking places would be reduced proportionately to 115 with a similar reduction in land requirement. 5. We still maintain that in this modern digital world of mobile communications, the objectives of the FMF could be achieved by an electronic booking/management system, AS WAS PROPOSED BY EDF AT STAGE 2 [this has been included in the Parish Council submission to PINS "It is regrettable that SCDC did not support a web-based Delivery Management System [Volume 9 – 6.9 – Chapter 3 – 3.2.5 and 3.2.6 refers]". This should now be reviewed. 6. With a reduction in the number of HGV movements and the reduced need for HGV parking places [see 4 above], coupled with the use of modern freight management systems, this totally challenges the need for a separate Freight Management Facility. Sizewell C Project – Traffic Incident Management Plan [8.6] and Planning Statement Appendix 8.4c on the Southern Park and Ride Site clearly shows a Traffic Incident Management Area which sized to accommodate 90 HGVs. Although this is linked to either planned or unplanned incidents, it is a large available space which would be empty most of the time and greatly underutilised. By modern and efficient freight management coupled with reduced HGV movements [see above] would provide the Freight Management Facility. The use of just one site would be more environmentally friendly, avoid huge capital costs at the beginning and end of the project, and the revenue costs throughout the construction period.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know

2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know

2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know

2f

Please explain your views.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

3a

Do you think enhancing the permanent BLF is:

Appropriate

X

Inappropriate

Don't know

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

4a

Do you think providing a new, temporary additional BLF is:

Appropriate

X

Inappropriate

Don't know

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate Inappropriate Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate Inappropriate Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate Inappropriate Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate Inappropriate Don't know

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate Inappropriate Don't know

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate Inappropriate Don't know

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate

Inappropriate

Don't know

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate

Inappropriate

Don't know

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Carol Ramsden

Email

[Redacted email address]

Address

[Redacted address]

Are you responding on behalf of an organisation?

Yes ☒ No ☐

If so, which?

Little Bealings Parish Council

Job title

Clerk

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

1a a) Support the DCO application approach.

Yes ☐ No ☐

1b b) Support moving more material by rail.

Yes ☐ No ☐

1c c) Support moving more material by sea.

Yes ☐ No ☐

1f Please explain your views, specifying the potential change to which your comments refer.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

Inappropriate X

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

Inappropriate X

Don't know

2f Please explain your views.

The Parish Council has no objection to the increase in the number of trains, so long as these do not take place at night and there is mitigation against any increase in noise. As the consultation says 'trains would mostly run at night' this means the increase is inappropriate.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

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- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate

Inappropriate

Don't know X

3f Please explain your views.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate

Inappropriate

Don't know X

4f Please explain your views.

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

- 5a

Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate

Inappropriate

Don't know X

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know X

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

6f Please explain your views.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

7f Please explain your views.

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

9f Please explain your views.

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Increase in train movements: the line runs very close indeed to private houses in the village.

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:

Appropriate Inappropriate Don't know X

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:

Appropriate Inappropriate Don't know X

11f Please explain your views. Please specify the option to which your comments refer.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:

Appropriate Inappropriate Don't know X

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:

Appropriate Inappropriate Don't know X

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate Don't know X Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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Consultation on proposed changes

Your details

Name

Andy Walker

Email

Address

Are you responding on behalf of an organisation?

Yes XNo

If so, which?

Suffolk Chamber of Commerce

Job title

Head of Policy

128 Stakeholder Type:

S42(a) - Prescribed consultee

129 Non-fitting

Question 1: Freight management

Building Sizewell C will require moving substantial volumes of construction material. In our DCO application, we anticipated around 60% of construction materials would be delivered by HGVs and the remaining 40% by rail and sea. We are now considering options for increasing rail and sea transport which could reduce the amount of material being moved by HGV, however there is a balance to be struck between the benefits and environmental effects of the potential options.

In relation to moving construction material for Sizewell C, do you:

- 1a a) Support the DCO application approach.

Yes XNo
- 1b b) Support moving more material by rail.

Yes XNo
- 1c c) Support moving more material by sea.

Yes XNo

1f Please explain your views, specifying the potential change to which your comments refer.

Suffolk Chamber is pleased to see that increased rail and sea movements could be used to transfer materials to the site, therefore reducing the number of HGV's in the local area. This is something we have been supportive of all along.

Question 2: Increased frequency of train movements

Work with suppliers, local councils and Network Rail on detailed site planning and logistics has so far identified three potential ways of bringing more freight to site by train during construction. Trains would mostly run at night.

We are seeking views on the following potential options while continuing to assess their feasibility (which is not guaranteed) and working with Network Rail to understand mainline capacity:

- 2a

a) Running four trains per day rather than three. Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know
- 2b

b) Running trains six days a week (Monday to Saturday). Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know
- 2c

c) The possibility of operating a fifth train for a short period at the peak of construction. This would require changes to the current passenger timetable on the East Suffolk Line. Do you think this potential change is:

Appropriate

X

Inappropriate

Don't know

2f Please explain your views.

Running increased train movements is advisable and would reduce traffic on the main roads through HGVs. We are supportive of an additional fifth train and running trains potentially through the night but this needs to be mitigated for local residents.

Sea freight

Question 3: Enhancing the permanent beach landing facility

We are proposing design changes to double the capacity of the permanent beach landing facility (BLF) to receive very large or oversized loads and make deliveries safer. Enhancements would include adding submerged beams on piled foundations to create a temporary landing platform on the seabed, and extending the BLF by around 30m.

Further site planning and logistics work has identified potential for increasing the amount of material brought to the site by sea by:

- enhancing the design of the permanent beach landing facility (BLF) (see question 3); and
- providing a new, temporary additional BLF (see question 4).

- 3a

Do you think enhancing the permanent BLF is:

Appropriate

X

Inappropriate

Don't know

3f Please explain your views.

Agree that this would be a good idea to enhance safety, and increase the number of deliveries, especially in the winter period.

Question 4: A new, temporary beach landing facility

We have continued seeking ways to bring bulk materials - such as aggregate and backfill soils – to site by sea. A second, temporary BLF located to the south of the permanent facility could be used to do this.

- 4a

Do you think providing a new, temporary additional BLF is:

Appropriate

Inappropriate

Don't know

X

4f Please explain your views.

Unsure due to the environmental impacts

Question 5: New, temporary beach landing facility options

We are consulting on four potential designs for the temporary, additional BLF.

Option 1: lowest capacity

Around 120m long and similar to the permanent BLF, this single berth facility has the capacity to receive up to 200 deliveries per year.

5a Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 2: short pier, low capacity

A 150m BLF with similar design to Option 1 and with a T-shape pier, this facility could allow faster unloading and has the capacity to receive up to 260 deliveries per year.

5b Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 3: medium pier, high capacity

A 270m BLF combining Option 2 with one or two self-elevating platforms, this facility would allow two barges at a time to be unloaded in deeper water and has the capacity to receive up to 520 deliveries per year.

5c Do you think this option is:

Appropriate X

Inappropriate

Don't know

Option 4: long pier, highest capacity

A 400m BLF similar to Option 3, but with four self-elevating platforms, this single berth facility has the capacity to receive up to 590 deliveries per year.

5d Do you think this option is:

Appropriate

Inappropriate

Don't know X

5f Please provide comments on any or all of the potential design options. Please specify the option to which your comments refer.

In principal we are happy for additional materials to be moved by sea, but aware that a new temporary landing could have detrimental impacts on the environment. As a result we would support the small piers which could still receive deliveries but unsure of the larger ones, although we see the benefit with the tide. If a pier is to progress we would support option 2 or 3.

Question 6: SSSI crossing

We are proposing a new design for the crossing of the Sizewell Site of Special Scientific Interest (SSSI) where two embankments – one at either end of the SSSI crossing – would be connected by a 30m long single-span bridge. This design would use less SSSI land than the previous proposal and provide additional flood relief, reducing water levels near to the SSSI crossing and further afield at RSPB Minsmere and parts of Eastbridge. Changes to the embankment slopes would allow taller, more substantial trees to be planted, better integrating the crossing into the landscape from coastal viewpoints.

6a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

6f Please explain your views.

Additional flood relief, and less SSI land is welcome.

Question 7: Fen meadow replacement

A small amount of fen meadow habitat on the SSSI will be lost due to Sizewell C. Our DCO application included two sites – at Benhall and Halesworth – to compensate for this. As fen meadow habitats are challenging to create, we are now also proposing an additional site near Pakenham, West Suffolk, to ensure we can create replacement habitat of the same quality and distinctiveness.

7a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

7f Please explain your views.

Appropriate - if supported by local residents in Pakenham

Question 8: Water Resource Storage Area

We are proposing to change the location of the temporary area for water that will be used during construction, with the

existing location used as a permanent flood mitigation area. This offers opportunities to create additional wetland habitats during construction and the potential for permanent wet woodland habitats once construction is complete.

8a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

8f Please provide your views on the long-term use of this area, particularly whether wetland habitats should be retained or a transition to wet woodland supported.

We are supportive of any changes which would create additional wetlands habitats and long term habitats after construction.

Question 9: Surface water

Under normal conditions, surface water would collect in ponds and filter into the ground. During very heavy rainfall, excess water would need to be discharged from the site. We are proposing to use a temporary drainage pipe that would pass over the temporary sea defences to release water onto the beach. The pipe would be up to half a metre in diameter and would not disrupt users of the diverted coast path.

9a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

9f Please explain your views.

Happy with as long as it stays temporary

Question 10: Other main site changes

a) Sea defence

We are proposing an increase in the minimum and maximum crest height of the permanent sea defence to provide further protection and allow for landscaping. We are also proposing a change to the temporary sea defence to simplify its construction.

10a Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

b) Construction activities and height limits

Changes to some height limits and activities during construction are proposed to allow for the potential increase in materials being delivered by sea. These include space in the temporary construction area for an additional stockpile, working heights at the BLF and to allow cranes to operate in the relocated marine tunnelling works area.

10b Do you think this potential change is:

Appropriate X

Inappropriate

Don't know

c) Tree retention

We are proposing changes to tree retention on the main development site to support construction activity in three locations. Two of the changes will not result in any additional net loss of trees and the other proposes removal of three or four trees.

10c Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

d) Boundary changes

Minor boundary changes (reductions and additions) to the main development site and the off-site habitat creation sites are proposed, including at the temporary construction area, the marsh harrier habitat improvement area west of Westleton, and the Benhall and Halesworth fen meadow compensation sites.

10d Do you think this potential change is:

Appropriate

Inappropriate

Don't know X

e) Bridleway

A new bridleway link between Aldhurst Farm and Kenton Hills is proposed to improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB.

10e Do you think this potential change is:
Appropriate ☒ Inappropriate ☐ Don't know ☐

10f Please provide comments on any or all of the potential changes. Please specify the change to which your comments refer.

Due to the loss of trees on site we would rather not see the loss of additional trees, we are supportive of the bridleway which could provide long-term benefits. We fully support the sea defence and have no view on boundary changes

Question 11: Sizewell B relocated facilities

Some existing Sizewell B facilities need to be relocated to build Sizewell C.

We are proposing to change the location of the administration building, reduce the height of the training centre to two storeys and change the layout of the Coronation Wood development area. There are two options for the location of the Sizewell B outage car park, depending on whether land is available at Sizewell A.

Option 1: changes with use of additional Sizewell A land

Should we reach an agreement for its use, land at Sizewell A would be used for the Sizewell B outage car park. Pillbox Field would be used for the planting of trees only and Rosery Cottages garage would not be demolished.

11a Do you think this potential change is:
Appropriate ☒ Inappropriate ☐ Don't know ☐

Option 2: changes without use of additional Sizewell A land

In this scenario, the layout changes would be made, but the Sizewell B outage car park and pedestrian connection to the Coronation Wood development area would remain in Pillbox Field as previously proposed.

11b Do you think this potential change is:
Appropriate ☒ Inappropriate ☐ Don't know ☒

11f Please explain your views. Please specify the option to which your comments refer.

We support option 1 due to reduce noise and environmental benefits but do not feel strongly about either option.

Question 12: Associated development changes

a) Reduction in land required

We are proposing potential reductions in land required, including a parcel of land at the A12/B1119 junction near Saxmundham no longer needed for highway improvements, minor reductions at the northern park and ride, and other small areas of land.

12a Do you think this potential change is:
Appropriate ☒ Inappropriate ☐ Don't know ☐

b) Boundary changes

We are proposing minor boundary changes (extension of the Order Limits) and/or additional land for the proposed Sizewell Link Road, Yoxford Roundabout, the Two Village Bypass (including two options for a proposed change to the public rights of way around Walk Barn Farm) and to support the accommodation works.

12b Do you think this potential change is:
Appropriate ☒ Inappropriate ☐ Don't know ☐

c) Southern park and ride

An extension of the landscaping is proposed at the southern park and ride to provide additional screening for views from the B1116 and a nearby footpath, along with other potential minor design changes.

12c Do you think this potential change is:

Appropriate X

Don't know

Inappropriate

12f Please provide comments on any or all of these proposed changes. Please specify the change to which your comments refer.

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MELTON PARISH COUNCIL (MPC)

RESPONSE TO SIZEWELL C (SZC) CONSULTATION ON PROPOSED CHANGES TO THE DEVELOPMENT CONSENT ORDER (DCO) - December 2020

EXECUTIVE SUMMARY

- A. The consultation period is inadequately short and does not allow for effective engagement with residents on matters that affect them.
- B. Melton is affected greatly by the transport strategy for SZC because key road (A12 and A1152) and rail (East Suffolk line) routes to Sizewell all pass through the parish.
- C. MPC has always supported a modal transport strategy for the movement of bulk construction materials that gave priority to sea over rail and rail over road. We support, in principle, EDF's proposals to reduce HGV movements, subject to the implementation of significant mitigation measures.
- D. MPC does not agree the proposal for multiple overnight freight train movements through Melton for a period of 11 years. EDF has guaranteed no freight trains through Leiston between 23:00 and 07:00 and should do the same for Melton and Woodbridge. We repeat our previously stated request that the East Coast line's capacity be increased, particularly between Melton and Saxmundham. This would improve the line's resilience and allow EDF's freight trains to run in daytime.
- E. EDF must mitigate the effects on households of rail noise (including barrier audible warnings overnight) and vibration. MPC's concern is that residents' real-life experiences of train noise and vibration are far more profound and intrusive than EDF's interpretation of its technical measurements. This is a complex subject and MPC takes assurance from the fact that EDF is working in consultation with ESC and SCC on a Rail Noise Mitigation Strategy and a Noise Mitigation Scheme.
- F. Even if SZC's plan to reduce HGV movements is realised in full, the project's significant extra HGV movements would exacerbate the already unacceptable traffic congestion in and around Melton.
- G. Multiple major developments in this part of Suffolk have had a cumulative impact on the strategic highways network and created an investment need that has not been met by the incremental approach of the statutory planning process. The Sizewell C project is an opportunity to redress some of that balance.
- H. MPC believes that the SZC project should mitigate (in whole or in part) some of the deficiencies of the A12 and A1152, rather than simply making them worse.
- I. A key priority is to keep the A12's traffic free-flowing. This reduces pollution and avoids congestion on the A12's many feeder roads. MPC contends that the A12 must be dualled continuously from Woodbridge to the Friday Street junction with the A1094.
- J. MPC would welcome any mitigation measures to the A1152 in Melton that improve road safety and reduce pollution. Required improvements include: straightening the dog-

legged level crossing at Melton Station; achieving optimal utilisation of the traffic lights at Melton crossroads; any measures that would substantially reduce the number of vehicles, especially HGVs, that transit Melton village.

- K. MPC is surprised and disappointed that EDF has not used this opportunity to address our previously stated concerns about the DCO with regard to: fresh water usage; the installation of new pylons for SZC in an AONB; the widely held view that the community dis-benefits of SZC outweigh the benefits.

THE 30-DAY CONSULTATION PERIOD

1. EDF's latest consultation proposals introduce a large modal shift in the movement of heavy construction materials, from road transport to rail & sea transport. The extent of the increased and overnight train movements through Melton would have a significant impact on our residents. In normal times, MPC would arrange a public consultation meeting to brief residents on the proposals and receive feedback. Such events also encourage residents to make individual responses. MPC contends that the 30-day consultation period is too short to allow adequate public debate in those parishes or towns, like Melton, which bear a greater adverse impact from these new proposals.

MELTON BACKGROUND INFORMATION

2. All of MP's previous responses to EDF at the pre-application stage, together with the council's "Relevant Representation" statement, can be viewed here - [Sizewell C | Melton Parish Council \(melton-suffolk-pc.gov.uk\)](https://www.melton-suffolk-pc.gov.uk)
3. Melton is a large parish, adjacent to Woodbridge and located at the first crossing point over the tidal stretch of the River Deben, at the Wilford Bridge. Melton has a healthy jobs base with several employment areas accommodating over 150 businesses. Melton's population has seen significant growth in recent years. There are over 1,800 dwellings in Melton Parish and an estimated population of between 4,000 and 4,275. We estimate that population has grown by about 10% in the last 4 years. Many new homes have been built recently, or are planned, along Woods Lane and other stretches of the A1152.
4. A map in **Appendix A** shows Melton's geographical position relative to key transport links, the Deben Peninsula and the various locations for the SZC project. **Appendix B** contains a detailed map of the whole of Melton Parish and is based on its 2016 Neighbourhood Plan, updated to show recent new-builds and planning applications.
5. The Local Plan describes Melton as the 'gateway to the AONB' – an accurate statement, though the less poetic reality is that the Wilford Bridge funnels heavy and growing traffic from all parts of the Deben Peninsula to the A12, and return. The Deben Peninsula is broadly defined as being the large area of land bounded in the south by the River Deben and in the north by the River Alde and includes Bawdsey, Hollesley, Orford, Rendlesham and the Bentwaters Business Park. **In brief, not only does Melton straddle the main north-south routes to Sizewell for road (A12 and A1152), it also does so for rail (East Suffolk line).**

OVERVIEW - HOW MELTON IS AFFECTED BY SZC's PROPOSED CHANGES TO THE DCO

6. In and around Melton Parish, we are experiencing heavy and growing road traffic. The major energy project at SZC, together with the Friston project, would hugely exacerbate the traffic volumes that cut through the middle of Melton village, causing delay to the movement of goods, services and people and creating intolerable conditions for residents. The movement of bulk construction material by train would also pass through Melton, with residents being impacted by train noise and vibration.
7. EDF's latest proposals are to run an extra night train (making a total of 4) and operate trains on Saturdays. EDF is also exploring the potential for a 5th train, assumed to run at night. In addition, EDF plans to build an additional, temporary, Beach Landing Facility (BLF) to import more material by sea. If SZC's proposals come to fruition, night-train movements would increase, affecting local residents adversely; and the increase in HGV and other vehicle movements would represent a slightly lower quantum jump than under the DCO proposals. In short, the transport impact of SZC on Melton is huge and all adverse, unless significant mitigation measures are put in place

FREIGHT MANAGEMENT STRATEGY

8. Throughout the SZC planning process, MPC has supported a modal transport strategy for the movement of bulk construction materials that gave priority to sea over rail and rail over road.
9. EDF's latest proposals move significantly in this direction and could reduce the amount carried by road from 60% to 40%.
10. The consultation proposals offer a mix of train and BLF options, giving different outcomes for the reduction in HGV movements. Put simply, if more material is moved by sea or train, less is moved by road. The table below (based on Table 3.4 in EDF's Consultation Document) shows the difference in HGV numbers (2-way movements) between the DCO proposals and the option that uses 4 trains and the larger BLF.

	<u>HGVs Typical Day</u>	<u>HGVs Busiest Day</u>
DCO baseline	325 (650)	500 (1,000)
Four Trains + BLF Options 3 and 4	250 (500)	350 (700)

11. MPC intends to remain consistent with its previously preferred transport strategy for SZC. MPC would support proposals that maximise the reduction of HGV movements on local roads, as summarised below:
 - To run an extra daily train (making 4 extra daily)
 - To run trains on Saturday
 - To run a 5th train daily, if it proves to be a feasible
 - The additional, temporary, BLF (Option 4)

but only if EDF implements appropriate mitigation measures, as described in the next section - in particular, measures that avoid the running of overnight freight trains through Melton and Woodbridge and, instead, run them in daytime.

RAIL – MITIGATION MEASURES

Line Capacity & Resilience Mitigation

12. The capacity and resilience of the East Suffolk line must be improved. EDF's plan to run trains during the hours of sleep (at peak, up to 5 extra trains per night i.e. up to 9 two-way train movements) through Melton and Woodbridge, from 2023 to 2034, is totally unreasonable. The East Suffolk line's capacity must be increased so that the proposed extra trains can run in day-time.
13. A capacity increase on the East Suffolk line is also essential to guarantee resilience. If there is to be a major increase in train movements on the East Suffolk line, EDF needs a robust contingency plan for dealing with a major breakdown, accident or other incident. MPC doubts that the current, limited, capacity of the East Suffolk line would permit EDF to provide assurance that, in the event of a freight-train incident, no disruption would ensue to day-time rail schedules, nor to those who depend on train travel for their livelihood.
14. At the Stage 3 SZC consultation, EDF proposed to build a passing loop between Melton and Wickham Market. At the time, MPC suggested that for little extra cost, "double-tracking" could be put in place between Melton and Saxmundham. MPC (supported by Woodbridge Town Council) urges EDF to revisit this double-tracking proposal. The East Suffolk line would then have the capacity and resilience to permit safe operation of the proposed extra trains in day-time, eliminating the threat of overnight train disturbance for Melton and Woodbridge residents and providing a significant and, much needed, beneficial infrastructure legacy.

Melton Level Crossing Mitigation

15. Melton is particularly disadvantaged by having a level crossing of one of the worst designs imaginable. The A1152 takes a dog-leg turn at its meeting point with the railway. This forces HGVs and large Agricultural Vehicles to cross to the opposite side of the road in order to navigate the bend, halting traffic flow and increasing congestion on an already congested road (see image below). The resultant standing traffic causes increased pollution. The Melton level crossing needs to be updated and straightened out – this requirement is also mentioned in the later section on suggested mitigation measures for roads. *Note:* At the time of writing, the surfaced area next to the level crossing is full of shipping containers, stacked 3-high, and its access to the A1152 is on the bend in the road, adding to local traffic problems.



Noise & Vibration Mitigation

16. There is an urgent need to mitigate the noise and vibration from:

- the proposed 4 to 5 overnight-trains passing through Melton
- any improvement work to the railway line.

With regard to overnight trains passing through Melton -

17. Throughout the SZC pre-application consultation process, MPC has been consistent in recommending that EDF should upgrade the East Suffolk line significantly. If done, this would enable EDF to run its freight trains in day-time rather than overnight.

18. Unfortunately, EDF's current proposal is to not upgrade the East Suffolk line to this standard. Instead, EDF's proposal is to run overnight freight trains through Melton and Woodbridge, possibly for 6 days per week, for 11 years (from 2023 to 2034). Each train would be about ½ kilometre long, typically made up a Class 66 locomotive and 20 wagons carrying 1,250 tonnes of construction material. Through the peak years, 2024 to 2028, EDF would run between 7 and 9 train movements every night, Monday to Saturday, for 5 years. The overnight trains would travel through Melton and Woodbridge at 10mph; then be held at the Leiston branch line until morning, when they would be delivered to site.

19. EDF has already acknowledged the disruption that overnight train movements would cause to Leiston's residents and has guaranteed that trains will not run through the town from 11pm to 7am. Indeed, EDF is to invest in building a temporary "green route" rail line to take trains directly from Saxmundham to the SZC site, bypassing Leiston. The combined population of Melton and Woodbridge is twice that of Leiston's. It is our contention that the case for avoiding overnight freight train operations through Melton and Woodbridge is as strong as that for Leiston. Our residents deserve the same protection. EDF should guarantee no freight trains through Melton and Woodbridge between 23:00 and 07:00, as it has done for Leiston. The efficient and fair solution would be for EDF to invest in a permanent upgrade to the East Suffolk line (especially the single-track stretch between

Melton and Saxmundham) to enable the extra freight trains to travel in daytime. This proposal is also supported by Woodbridge Town Council.

20. The unreasonably short consultation period will deny many residents the opportunity to become aware of and comment on EDF's plans for overnight train operations through Melton and Woodbridge. Many will only become aware of the issues when this document is published shortly before being approved by MPC on 16/12/2020 – by which time the deadline for responses would have nearly passed. The likely low number of consultation responses from residents in Melton and Woodbridge should not be interpreted by EDF as indifference or acquiescence to its rail strategy. There are some residents living near to the railway line who are aware of the plans for overnight trains. A small number have made their views very clear to MPC and the unambiguous message is that they do not want overnight trains through Melton and Woodbridge – see **Appendix C**. If Melton residents have to endure extra trains, they want them to run in daytime.
21. Noise and vibration disruption take several forms. Firstly, there is the alarm noise from barrier crossings. For any amount of overnight train operation, EDF must find a solution to the alarm noise from closed barriers at the A1152, Dock Lane and other level crossings in Melton, together with similar level crossings in Woodbridge, all in residential areas.
22. EDF's technical assessment of barrier alarm noise at level crossings was based on crossings on the Saxmundham to Leiston Branch Line. EDF's view is that, at night, properties that were not directly adjacent to the crossing alarms were unlikely to be significantly affected by them. Our view is that most of the crossings assessed by EDF are in virtually open countryside and quite untypical of the level crossings in Melton and Woodbridge. Those assessments may, therefore, be of questionable relevance. EDF assessed at least one level crossing in Leiston and this was probably more typical of the crossings in Melton and Woodbridge. There is, therefore, a striking inconsistency of policy in that EDF has promised no overnight train operations in Leiston but is proposing to operate up to 9 overnight trains through Melton and Woodbridge. We also question whether EDF's view of barrier alarm noise would match the real-world experience of a large cluster residents living near the line.
23. Melton residents tell us that the barrier alarm warnings are loud and particularly penetrating at night. To quote an e-mailed comment on 2/12/2020 from a Melton resident (who also happens to be a parish councillor) living 400 metres from the A1152 barrier crossing: *"The noise does carry from Melton Station all the way to our cottage most days, so you can see the distance the sound can carry and the potential for disturbed sleep. It's like a car alarm going off and sounds like a police car! Nee nah nee nah! Very unpleasant but necessary for safety reasons."* This highlights the key point - residents will accept barrier alarms in day-time hours. Residents will not accept barrier crossing alarms of up to nine times per night, disrupting their sleep for long periods as the trains pass slowly through Melton and Woodbridge, for years on end. This would be totally unacceptable. It requires EDF and Network Rail to either eliminate the problem (preferably, by running trains only in daytime) or apply substantial mitigation.
24. Secondly, on the general issue of noise and vibration, MPC takes assurance from the fact that EDF is working in consultation with ESC and SCC on a Rail Noise Mitigation Strategy and a Noise Mitigation Scheme to further develop the mitigation proposals for the project. MPC's view on the noise mitigation strategy and scheme is that:

- it must protect all households that are affected adversely by rail noise & vibration
 - there should be clear and fair eligibility criteria to identify those households that qualify for sound insulation
 - the terms of the scheme should be communicated directly to all households in Melton that are adjacent to the railway line.
25. Anecdotal evidence from Melton residents living within hearing distance of the railway line indicates that their real-life experience of train noise and vibration is far more profound and intrusive than EDF's interpretation of the technical measurements recorded for its Environmental Statement and more recent studies. MPC, therefore, wants EDF's measurements of rail noise and vibration to be subject to independent scrutiny by SCC's and ESC's technical experts.
26. MPC is aware that EDF's Noise Mitigation Scheme is expected to include use of long-welded track, the ideal locations of welded rail joints, the use of under-ballast mats, or equivalent, speed restrictions on train movements in built up and sensitive areas, and preferences for particular locomotive types. MPC's view is that any overnight train should use the quietest modern locomotives available, certainly none noisier than a Class 66 locomotive (fitted with sound attenuation equipment) should be used. Again, MPC expects the Noise Mitigation Scheme work programme to be developed in consultation with ESC and SCC.

With regard to any rail improvement work –

27. MPC would want assurance that:
- if rail improvement work has to be done at night, Network Rail should avoid undue disturbance to the population by banning work between midnight and 6am in residential areas.
 - during any upgrade work, impacts on passenger services, vital for Melton people commuting to Ipswich and beyond, are minimised.

ROAD – MITIGATION MEASURES

SZC Will Exacerbate Existing Traffic Problems Unless There Are Mitigation Measures

28. Paragraphs 29 to 39 provide detail relating to MPC's concerns with regards the impact of the SZC proposal on the A12 and A1152 and how these impacts should be further mitigated. This detail is consistent with information provided to EDF at previous stages.
29. Even if SZC's plan to reduce HGV movements is realised in full, the project's significant extra HGV movements (in any of the scenarios presented in the proposed changes to the DCO application) would exacerbate the already unacceptable traffic congestion in and around Melton.

30. The SZC and Friston energy projects will each generate a quantum leap in traffic on the A12 and A1152. To this, should be added the extra HGV traffic from the possible increased use of Bentwaters Business Park for off-site support offices, stores etc.
31. MPC is extremely worried that a further increase in traffic congestion through the middle of Melton village would make life intolerable for its primary school children and residents. It would also be bad for business and hinder the efficient transport of goods, services and people.
32. There is widespread local concern that the SZC and Friston energy projects will also lead to an explosion of rat-running, when drivers choose to avoid using the A12 or the Southern P&R site. Vehicles seeking alternative north-south routes will use rat-runs through Martlesham, Woodbridge and Melton that converge in the middle of Melton village and follow the A1152 over the Wilford Bridge and on to Rendlesham, Bentwaters, Tunstall, Snape, Leiston, Sizewell & Friston.

Cumulative Impact of Major Developments

33. The traffic impact of the two major Energy Projects brings into focus the concerns of MPC and others that multiple major developments in this part of Suffolk have had a cumulative impact on the strategic highways network and created an investment need that has not been met by the incremental approach of the statutory planning process. This planning application is an opportunity to redress some of that balance.

Contingency Planning

34. The A12 is already vulnerable in the event of major breakdowns, accidents, Orwell Bridge closure, adverse weather, the Latitude Festival or other incidents. EDF must develop a robust contingency plan for dealing with such impediments to the flow of its HGV traffic. MPC wants assurance from EDF that HGV traffic would not be routed through Melton to Sizewell at times of congestion on the A12.

Suggested Road Mitigations

35. MPC believes that the SZC project should mitigate (in whole or in part) some of the deficiencies of the A12 and A1152, rather than simply making them worse.

The A12

36. A key priority is to keep the A12's traffic free-flowing. This reduces pollution and avoids congestion on the A12's many feeder roads. MPC contends that the A12 must be dualled continuously from Woodbridge to the Friday Street junction with the A1094. MPC therefore supports:
- dualling the single-carriage stretch of the A12 between the Seckford Hall turn-off and the Grundisburgh Road roundabout;
 - dualling the single carriage stretch of the A12 between the Woods Lane roundabout and the Ufford Road turn-off;

- Most importantly, MPC wishes to work with any relevant authority, to identify options that could substantially reduce the number of vehicles, especially HGVs, that transit Melton village.

SOUTHERN PARK AND RIDE

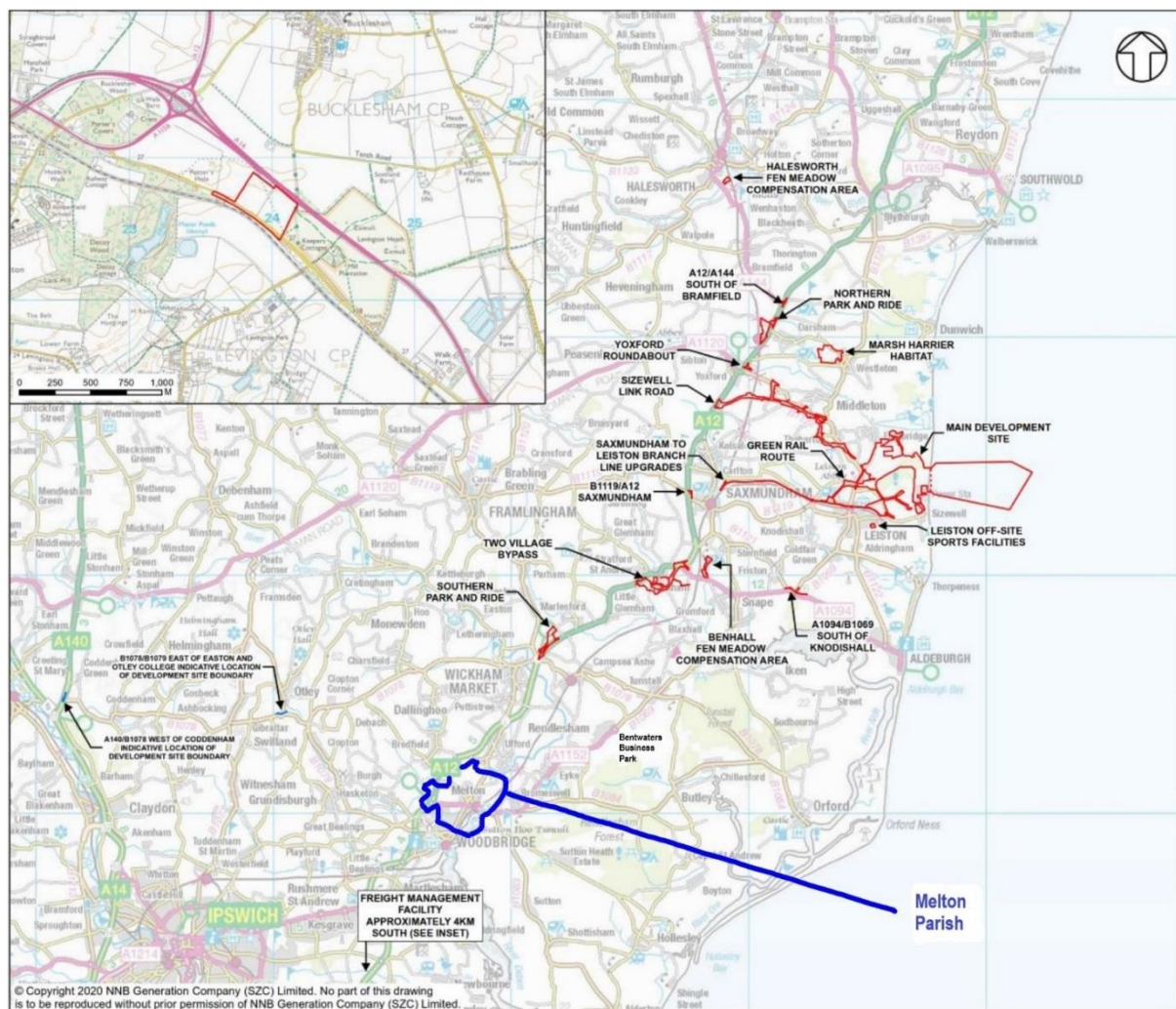
40. MPC notes the proposed changes to the DCO and re-affirms its previously stated view that the Stage 2 consultation option for the Park n' Ride to be located adjacent to the Woods Lane (A1152) roundabout with the A12 must remain off the table.

OTHER PROPOSALS

41. MPC has no comments to make on the proposals for: SSSI Crossing; Fen Meadow Replacement; Water Resource Storage Area; Surface Water; Other Main Site Changes; Sizewell B Relocated Facilities; Associated Development Changes.
42. MPC is surprised and disappointed that EDF has not used this opportunity to address our (and other's) previously stated concerns about the DCO:
- ***Fresh water usage*** - SZC will need 2-3m litres of fresh water daily, from an area of low rainfall where the frequency and severity of drought will worsen with climate change. We are concerned this will impact adversely on agricultural and domestic supplies and cause ecological problems in the region.
 - ***The installation of new pylons for SZC in an AONB*** - this invasive approach was avoided in the 1980s for SZB, as it should be in the 21st century for SZC. We suspect this is a cost saving measure, not an unsolvable technical problem - and it should be reversed.
 - ***Our view that the community dis-benefits of SZC outweigh the benefits.*** - this is consistent with MPC's view following our consultation event in March 2019 with Melton residents. The community will incur severe dis-benefits to transport, the environment and pollution, tourism, accommodation and community safety. While the economic benefits to the supply chain and jobs are welcome, in the latter case they fall short of expectations. For new jobs, only a small proportion of the higher graded, senior, posts will go to local people.

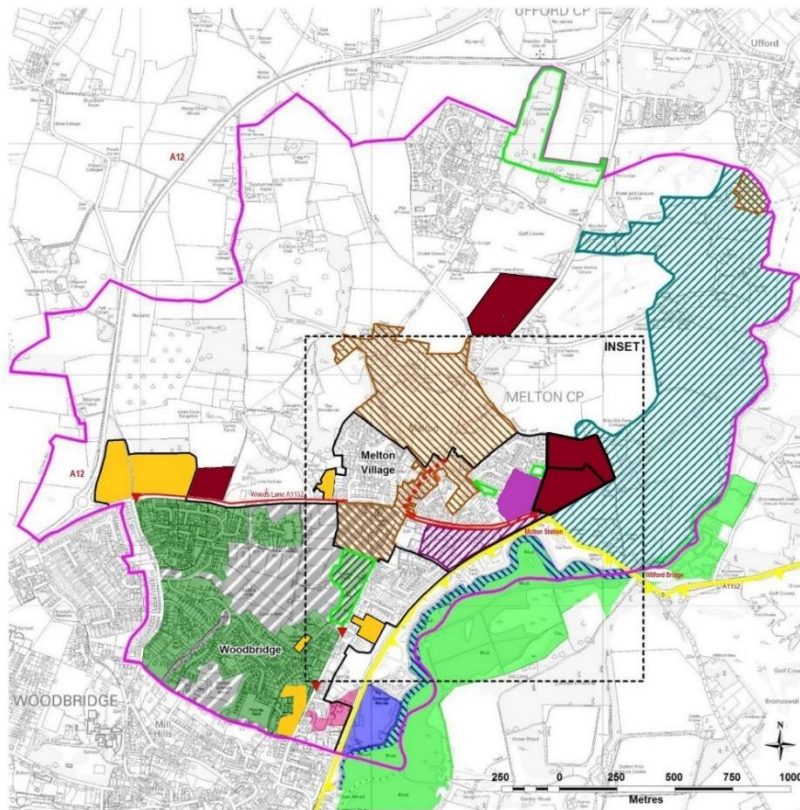
APPENDIX A

Map showing the position of Melton Parish relative to key transport links, the Deben Peninsula and the various build-locations of the proposed SZC project [Reproduced by kind permission of EDF].



KEY

- Neighbourhood Plan boundary
- MEL1 - Physical Limits Boundaries
- MEL 2 - Provision for cyclists and pedestrians:**
 - ▼ Pedestrian / Cycle Crossing Point
 - ***** Traffic Calming / Dedicated Cycle Access
 - Footpath / Cyclepath Provision
- MEL3 - Area of Outstanding Natural Beauty
- MEL7 - Land opposite McColls Convenience Store, The Street
- MEL9 - Improvement to Community Facilities
- MEL11 - Special Landscape Areas
- MEL12 - Local Green Space
- MEL13 - Protection of Trees and Rural Character
- MEL14 - Retention of Riverside Qualities
- MEL15 - Residential Boats
- MEL16 - Melton Conservation Area
- MEL17 - Areas to be Protected from Development
- MEL19 - General Employment Areas
- MEL20 - Deben Mill
- MEL21 - Land off Wilford Bridge Road
- Deben Estuary Special Protection Area (Natura 2000)
- Housing built recently
- Commercial Premises built recently
- Planning Permission applied for recently



APPENDIX C

COMMENTS FROM MELTON RESIDENTS

The common thread running through public responses to-date is that none want any overnight trains running through Melton and Woodbridge.

One Melton resident, a former railway engineer, emailed a parish councillor on 9/12/2020 suggesting that the proposed overnight trains could actually be run in daytime:

“The Class 66 is an American industrial design from the 90s and first came to the UK in 2000. Freight companies also use class 37 built from 1960 as English Electric Type 3's and Class 47s which date back to 1963. As the Class 37s would work in pairs they are extremely noisy as is currently apparent with the leaf clearance trains at night.

Restrictions should therefore apply to which locomotives may be used on the Sizewell freight contract. I would suggest none noisier than a Class 66 should be allowed and the class 66's should be fitted with sound attenuation equipment if practicable.

There is a general capacity problem with freight trains to and from Felixstowe already and Sizewell will obviously exacerbate the problem. There is however no reason why freight trains could not be held at Ipswich rather than Leiston to allow daytime working over the East Suffolk line.

Does the East Suffolk line passenger density justify an hourly service during the day? A 1½ hourly service would allow freight trains to run without double tracking.

Automatic crossing on minor roads such as Dock Lane should default to being in the down position at night, with a phone request to raise the barrier when necessary. This would reduce the number of audible warnings required and thus sleep disturbance.

Given EDF's nuclear projects in France and at Hinkley Point are way behind programme and substantially over budget, the 11-year window is over optimistic.”

Another Melton resident emailed a parish councillor on 9/12/2020 confirming the exceptional traffic growth in traffic in recent years and expressing a preference for EDF's freight trains to be run during the daytime rather than overnight:

“to be honest this whole thing fills me with deep depression. The area simply isn't equipped for the level of traffic on the roads or rail. Even since we arrived 4 years ago, we have noticed a huge increase on the road. Melton crossroads is rarely empty and usually has a long queue in at least one direction.

X has sent you the professional comments, mine can only be from my gut!

I am already woken by the line cleaning train in the night, and whilst I actually love our little local train, and miss it when it isn't running, that is because it is only twice an hour. I think I would feel very differently with the increase, though would prefer more in the day if it means less at night.

I completely agree that sea is the way to go, but know that from the start they have said thos would not happen. I despair of the extra footfall and traffic in the area during the building, and obviously feel this is completely the wrong place to build it, as I love that beach. We were there the other day, and I will whatsapp you a photo of a house along the cliff from there...their picnic area literally now hanging over the beach

Sorry, not very helpful. Just don't want it!!!"

17th December 2020

As a Council whose residents are directly affected by the proposed construction of Sizewell C by EDF, Hacheston Parish Council (HPC) is most concerned that you have brought in further proposals for consideration by PINS immediately after the deadline before which interested parties had to make their representations to PINS, following your application for a Development Consent Order. The proposals contained in the document "Consultation of Proposed Changes" are such that there is no certainty that you will be able to deliver measures that would produce the best outcomes for East Suffolk, particularly with regard to the delivery of materials to the site by rail and sea.

We are unable to comprehend why these proposals have been put forward at such a late stage, bearing in mind that you have had over eight years to formulate your DCO application, yet you failed to include them in the DCO application. This is in spite of the fact that they address some of the concerns that have been expressed by our Parish, and others, throughout the consultation stages, from Stage 1 to Stage 4 Consultation.

Our concerns remain as stated in the responses made by HPC to all previous consultations. However our main concern is with regard to the Southern Park and Ride (SP&R), and in this respect we comment on the proposed changes as follows:

- a) We are glad to see that you have reinstated the length of the bunding on the north west boundary. For some reason this had been reduced in length in your DCO application from that shown in Stage 4 and earlier Consultations. However we have pointed out that the elevated position of the SP&R makes the site an inappropriate one, and whilst we agree that the height of the bunding around the site should be 3m, this will only make the SP&R more visible from all directions.
- b) Table 5.1 of the Consultation of Proposed Changes refers to assessment of effects on 'users' of B1116, but no account has been taken of residents of properties which will be able to see the SP&R once it is constructed.
- c) No details of the proposed lighting on the SP&R site have been supplied. The site will be constructed in a 'dark skies area' and this has not been taken into account in any of the documents or statements prepared in support of the DCO application.
- d) No detailed breakdown of the projected traffic volumes at the 5 ways roundabout – junction of A12, B1078 and B1116 – and for traffic using the B1078 through Wickham Market have been provided. This has been requested on a consistent basis at each of the Stages of Consultation by HPC and others, and without this information HPC is unable to give a considered response to the proposals.

e) Adequate detail of the landscaping proposals in and around the SP&R site have not been provided to enable this Council and other authorities to consider whether appropriate mitigation will be implemented.

Our other concerns remain with the increased traffic volumes which will destroy the local Suffolk environment.

Your new proposals will not have any impact on reducing traffic volumes during the first three years pending construction of the Park and Ride sites and the new roads proposed in the DCO application. During these early years 600 HGVs per day, plus other vehicles travelling to both the Sizewell C site and other Energy Projects which would use the A12 and B1122.

Sizewell C would still generate up to 12,000 extra vehicle journeys per day, massively increasing traffic on the A12, surrounding roads and making rat runs more likely. These vehicles will have noise and vibration impacts along the whole of the road networks that will be used to access the Sizewell C site. The A12 & A14 are already problematic; the Orwell Bridge, EDF's Freight management facility and new roundabouts will all increase the risk of delays for the residents of Suffolk as well as those travelling to the Sizewell C site.

Quite apart from the noise and vibration impact referred to above the High Court has now determined that pollution can be considered as a cause of death. The considerable amount of pollution which will be generated by this additional traffic will have an adverse effect on the inhabitants of the County and will no doubt have a serious impact on their health and possibly be the cause of death of some of them. This needs to be considered with care.

Finally we would add that your revised proposals do not change our overall objection to, or concerns about, Sizewell C.

Yours faithfully,

Jane Page

Jane Page CiLCA Clerk Hacheston Parish Council

copies:

- The Planning Inspectorate: SizewellC@planninginspectorate.gov.uk
- Dr Dan Poulter MP
- Suffolk County and East Suffolk leaders and cabinet leads on Sizewell C:

[REDACTED]

[REDACTED]

- Suffolk County and East Suffolk District Councillors.
- Stop Sizewell C info@stopsizewellc.org

[REDACTED]
Sent: 16/12/2020

To: sizewell@edfconsultation.info

[REDACTED]
Subject: Fw: Response to your Stage 5 Consultation

Dear EDF

Our response to your Stage 5 Consultation

We were astonished that you should have launched yet another stage of consultation on your plans for Sizewell C at the point when all the community's 'Relevant Representations' on your application to the Planning Inspectorate have already been submitted and its public examination of your proposals is about to start.

We have two very serious issues to raise in our response:

The first is very specific. Your Stage 5 consultation shows no evidence that you have given any consideration to the alarm in Theberton and Eastbridge about the extreme difficulties there will be in accessing the essential services in Saxmundham and Leiston on which we are absolutely dependent. We face being 'kettled in' on the B1122 and to get to Leiston we will have to navigate a very challenging T junction to join the new link road, then negotiate the roundabout at the site entrance and then get through the new railway crossing. Experience at Hinkley suggests that the traffic jams will be immense and that a journey that currently takes 5 minutes may take up to an hour. The journey to Saxmundham will be even more fraught. Ours is an ageing and increasingly vulnerable population for whom swift response by the emergency services, particularly ambulances has become ever more important, as are deliveries given the total lack of shops and the absence of any transport

Many of these problems could be overcome if you did not continue to insist on closing off Pretty Road to road traffic and replaced your proposed pedestrian bridge with one constructed to carry vehicles. You accompanied this stage of the consultation with the launch of your eleven pledges to the local community. The first of these is to 'Minimise the disruption to the local community'. If you want to demonstrate that there was any meaning to this and that it was not just another piece of cynical window dressing, you would very swiftly announce your intention to continue to allow road access along Pretty Road.

The second group of issues are more general. At this very late stage you present a range of options for an increase in freight transport by both sea which might lead to a reduction in the predicted volume of HGV traffic. You make it quite clear that these are highly speculative and that there is no guarantee that can be delivered. We find it absolutely extraordinary that you are now attempting at the last moment to substitute what we had expected to be a definitive and fully researched plan of action for presentation to the public examination with a series of

possible options for the consideration of inspectors. You will be then looking to the Secretary of State to grant his or her consent to to your development based on whatever of these options you may choose to pursue. This would be quite indefensible.

EDF you have had ten years, with four previous stages of consultation over eight year to hone your plans. You have chosen throughout to ignore community concerns about the impact of your vehicles on our totally inadequate road system. Now at the very last minute you seem to have decided that there is some validity to our concerns. If this is not incompetence of the grossest order, we do not know what is. It has caused us to fear that your plans for the entire project, including the safe operation of the nuclear reactors, are similarly flawed.

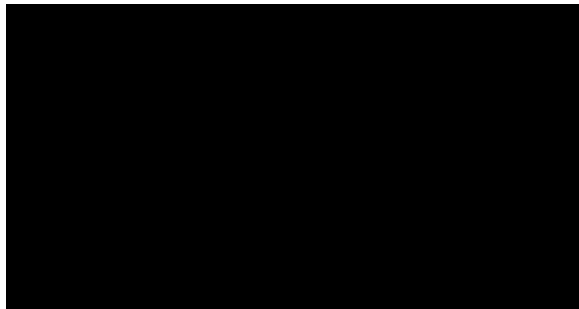
You have presented no convincing evidence to demonstrate that you will be able to reduce the volumes of HGVs predicted in your application for the Development Consent Order, so we consider that it is those original figures stated there that the examining inspectors must be regard as the numbers that you are continuing to project. Their impact on local communities and the environment is totally unacceptable

Judith Croton and John Rea Price





Martlesham Parish Council



16 December 2020

FREEPOST SZC Consultation

Our ref: 20-351-Sizewell C Proposed Changes

Dear Sir/Madam

The Sizewell C Project – Consultation on Proposed Changes

Thank you for the opportunity to comment on the Proposed Changes to the Development Consent Order (DCO) application.

1. Introduction and scope of response

- 1.1 While Martlesham Parish Council (MPC) shares the wider concerns of local Parish Councils about the impacts of the Applicant's proposals for mitigating the impact on local environmental habitats (enhancing biodiversity out of the area, namely, West Suffolk and Halesworth) climate change and tourism, and supports the views of the Environment Agency and national and local conservation groups, our submission concentrates on the impact of traffic congestion along the A12 at Martlesham.
- 1.2 The concerns listed below have been detailed in our responses to each of the four consultation stages carried out by EDF. It is fair to say that these concerns, which are shared with other local parishes, have been largely ignored.
- 1.3 The proposed changes simply tinker at the edges. The shaving of HGV movement numbers does little to address the problem of traffic volume and excludes lighter goods vehicles (LGVs) movement. There is no evidence of the consequential impact that such traffic volume would make on the local community of Martlesham.
- 1.4 We support:
 - A cross - party approach to comprehensively plan for traffic movement within and around Martlesham, considering all strategic developments set to affect Martlesham
 - A wider traffic strategy to facilitate low carbon emission policies
 - Greater use of public transport provision in the short and long term
 - Greater investment in rail and sea options
 - Increasing the local legacy of rail provision across the region.

2. Traffic flow and congestion

- 2.1 The Applicant has consistently underestimated traffic flows along the A12. It handles a high volume of local, residential and arterial traffic. It delivers traffic to Martlesham Heath which is the main employment area east of Ipswich and delivers tourism traffic to the coast.
- 2.2 Traffic flow along the A12 at Martlesham is currently interrupted by 4 major roundabouts less than a mile apart. A 5th intersection is planned at Brightwell Lakes, Martlesham, to accommodate a development of 2000 houses. Traffic lights are proposed for all these junctions with the A12. Has the impact of the construction of Brightwell Lakes been factored into the impact of the construction of Sizewell C on local communities and traffic?
- 2.3 Any additional Sizewell volume, road works or traffic accident, will exacerbate traffic congestion at Martlesham.

Sizewell Transport Strategy

- The Application forecasts that approximately 40% of construction materials (by volume) would be moved by rail or sea. This leaves 60% as the target to be transported by HGV.
- There is no consistent definition for HGV across the DCO application and proposed changes.
- The Applicant's change in transport strategy results from stakeholder pressure and is said to be accommodated by an increase in the frequency of freight train movements. The option could be increasing 5 overnight and one daytime rail movements (presumably per day?) to 7 overnight and one daytime movement, increasing the frequency to six days per week including Saturdays or similar small increases to facilitate carriage of bulk materials by rail; and the enhancement of the single permanent Beach Landing Facility with options for one new temporary Beach Landing Facility to facilitate material imports by sea.
- The capacity of each train is equivalent to that of 67.5 HGVs (135 two-way HGV movements).
- The total capacity for rail transport (i.e., availability of the network lines for use by Sizewell), has not been confirmed by Network Rail.
- If that reduction to 40% can be achieved, however, the Applicant would expect that HGVs *could* be reduced to approximately 250 on a Typical Day (500 movements reduced from 650 movements daily) and 350 on the Busiest Day (700 movements daily reduced from 1000 movements daily). This *could* represent a reduction of 150 HGVs on the Busiest Day (300 2-way movements) daily compared to the DCO submission.
- Even if there was enough combined capacity to potentially transport up to 60% of the total volume of materials by rail and sea, the volume of material moved by HGV is unlikely to be less than 40% of the total "*as this proportion of materials is best suited to road transportation*". (unexplained)

- 2.4 We have previously outlined Martlesham's safety needs and local impact assessment within our Stage Three and Stage Four consultation responses, highlighting that our HGV and traffic concerns are peculiar to Martlesham and its location on the A12 approach to Sizewell.
- 2.5 The projected cumulative effect of all traffic movements will starve Martlesham of the accessibility needed to move around Martlesham's three key employment areas – the retail park, the business park and the research park – and its 2 residential areas (3 residential areas with Brightwell Lakes).
- 2.6 We would welcome an explanation of why 40% of the total is the "*proportion of materials best suited to road transportation*".

3. The Seven Hills Transport Hub

The Applicant had projected 1,140 private car, 700 minibus and 700 HGV movements each day. The proposed change is to reduce this by 150 traffic movements daily, controlling traffic flow from the transport hub at the A14/ Seven Hills junction.

The Seven Hills roundabout struggles to cope with traffic circulation to the Crematorium, the local and very busy minor road to Ipswich, and A14 to Felixstowe (and Port), to Ipswich, with onward access to London and the Midlands. When the A12 grinds to a halt with stationary or slow-moving traffic to and from the Seven Hills transport hub, as we predict it will, both Martlesham residents and the Sizewell construction workers will be deprived of vital access to the sole, regional hospital accessed via the A1214 at Martlesham.

4. Health and Well Being

- 4.1 We note the Planning Inspectorate's list of Principal Issues includes an examination of Air Quality data, mitigation measures and alternatives. This is essential.
- 4.2 Traffic congestion will adversely impact on Martlesham's air quality (which is already a concern at current traffic levels). Transporting consignments of construction materials and nuclear material exclusively by Rail and Sea would bring problems of their own, but not to the same extent.
- 4.3 The effect of traffic congestion on health and wellbeing cannot be understated. Traffic noise, vibration, air-borne particulates, can and will bring about effects detrimental to residents living in the area and to the appeal of Martlesham as a place to work.
- 4.4 The consequences may well be employment relocation out of area, and the loss of the Martlesham amenities currently vital to service the new 2000 home Brightwell Lakes development. Martlesham may fail to thrive as a desirable place to live and work because of Sizewell.
- 4.5 The 900 job "opportunities" offered by Sizewell will then simply compensate for lost employment opportunities at Martlesham.
- 4.6 Traffic congestion on the A12 means the A12 would not effectively link Sizewell to the hospital and medical resources in Ipswich in an emergency, depriving construction workers and residents of critical medical care.
- 4.7 In leaving improved passenger rail infrastructure in place to alleviate traffic congestion, Sizewell could leave a beneficial lasting legacy to Martlesham.

5. Rat-running

MPC has continually expressed concern about rat- running down Felixstowe Road, Main Road, The Street & Top Street, Martlesham, during times of traffic congestion on the A12. The Applicant says they will install ANPR cameras to detect and subsequently ban HGVs which use non - designated routes but have made no proposals to control LGVs and private cars.

The Street is currently particularly badly hit with rat-running traffic (88,100 vehicles a week). Main Road itself (24,100 vehicles a week), from the A12 roundabout to the Red Lion Public House, is protected with a weight limit but this has led to an HGV rat run from the A12 at the Foxhall roundabout, down to the Newbourne Road crossroads then left to School Lane/Red Lion PH, right into The Street and onwards to join the A12 again at the Woodbridge roundabout. ANPR cameras to enforce the weight limit in Main Road will not prevent this rat run, which will be exacerbated by Sizewell C traffic.

6. Other Issues

- 6.1 The Planning Inspectorate's list of Principal Issues includes an examination of the cumulative and in-combination effects of other major energy proposals on the local communities. This is essential.
- 6.2 There is little information on the new, independent, Environmental Trust. No information is given on financing the Trust or the proposed legal structure (essential to its independent status) nor the Trust's powers (before, during and post Sizewell construction).
- 6.3 We note the significant risks and uncertainties recognised by the directors in their Annual Report and Director's Statements for the year ended 31st December 2019. In particular,
- *"the continuation of the Sizewell C project is conditional upon a robust investment framework being agreed by the Applicant, NNB Generation Company (SZC) Ltd, with its shareholders (EDF 80% and CGN 20%) and parent company in advance of the financial investment decision anticipated late 2021."*
 - *"EDF is supportive of financing the project provided there is a cap to the risk exposure for cost overruns. This financing model has apparently never been implemented for projects of this scale (presumably, including Hinckley Point C) and securing the appropriate risk-sharing mechanism and funding structure is key to the project"*
 - *"There are identified political risks and regulatory risks which are being mitigated by management engaging with local residents, regulators and politicians in addressing the safety needs, local impacts and the need to meet the current and future national energy demand"*
 - *"The Applicant wishes to see a labour mobile immigration system following Brexit for the Applicant to access and utilise a non- UK workforce."*
- 6.4 We question why the consultation presents such limited rail and sea options.
- 6.5 The rail strategy is presented as reliant upon Network Rail agreeing capacity and working within the constraints of the East Suffolk Line as it is now. As finance has not yet been decided, MPC would like to see a change option to expand the East Suffolk rail network.
- 6.6 There is an urgent need locally for "joined up thinking" in meeting the current and future demand for energy - to assess the Sizewell impact alongside the East Anglia Energy Hubⁱ and its renewable energy application which will impact neighbouring communities to Sizewell, and coordinate with UK Government's commitment to investigate nuclear fusionⁱⁱ.
- 6.7 The so-called "job opportunities" on offer locally, are clearly a small concession offered in recognition of the massive employment opportunities to be opened up to foreign labour markets.

7 In Summary

We feel there is insufficient information to support the Development Consent Order either as submitted or with the proposed changes. We do not support:

- The transport of build materials and nuclear waste through Martlesham by road
- The failure to leave a lasting transport legacy to Martlesham
- The failure to assess whether alternative emerging technologies will displace the need for Sizewell C before it comes on stream

- A consultation ignoring the cumulative effects of the overall energy picture for East Suffolk
- The decommissioning proposals for the plant; these are untried and untested
- The plans for medical care; for a temporary workforce, for emergencies and evacuation, the traffic congestion on the A12 means the A12 would not effectively link Sizewell to the hospital and medical resources in Ipswich
- Habitat mitigation being addressed by relocating species out of area and through enhancement of biodiversity sites out of area, at the expense of the Sizewell habitats. The special qualities of the Suffolk Coasts and Heath Area of Outstanding Natural Beauty (AONB) are being ignored.

Yours faithfully



Susan Robertson
Clerk to Martlesham Parish Council

Cc Martlesham County & District Councillors, MPs Coffey & Poulter, Suffolk Preservation Society

ⁱ ScottishPower Renewables, part of the Iberdrola group, is now progressing its £6.5 billion East Anglia Hub programme, which comprises three windfarm projects – East Anglia ONE North, TWO and THREE. Collectively, the windfarms will generate up to 3.1GW of green energy – enough to power the equivalent of more than 2.7 million homes. Subject to planning considerations, construction of the three projects is expected to commence in 2022, with completion by 2026.

ⁱⁱ The UK Government has commenced its search for a suitable site adjacent to the National Grid site to hold the [Spherical Tokamak for Energy Production](#) (STEP), a next-generation [tokamak fusion reactor](#) planned for breaking ground in 2030 and productive fusion in 2040.

Dec 2020

Suffolk Coast & Heaths AONB Partnership comment on proposed changes to Sizewell C Development Consent Order

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) **maintain the position it outlined within its submitted Relevant Representations** made in September 2020.

This representation is made on behalf of the Suffolk Coast & Heaths AONB Partnership. The Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty.

For the avoidance of any doubt, some members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.

The AONB Partnership's main concerns relating to the changes to the Development Consent Order submitted as part of the planning process are outlined below in points 1-7:

- 1) The AONB Partnership considers it has **not had enough time to fully consider the proposed changes** to the Development Consent Order in the timescales available. The AONB Partnership consider it unfortunate at best that:
 - The changes were submitted a few days after the deadline for the submission of Relevant Representations.
 - That the consultation process for the consideration of these changes was limited to one month, meaning that organisations such as the AONB Partnership had very little time to come to a common view on the proposed changes.
 - That organisations such as the AONB Partnership, and we understand that many community based organisations, environmental Non-Government Organisations and others were lacking capacity. This was easily foreseeable given other Nationally Significant Infrastructure Projects that impact on the AONB and natural environment in the immediate area.
- 2) The AONB Partnership consider that a **lack of detail** in the *Consultation Document. Consultation on Proposed Changes November – December 2020* does not allow for proper consideration of the impacts of the changes on the nationally designated AONB. It has concerns about lack of:
 - Lack of detail in proposals for an enhanced beach landing facility making any assessment of impacts on the AONB is speculative.
 - Lack of detail in proposals for a temporary beach landing facility meaning any assessment of impacts on the AONB is speculative. There is little detail in terms of

- Design of temporary beach landing facility, such as dimensions, use of colour etc.
- Lighting on temporary beach landing facility.
- Assessment of noise such as from conveyor and other mechanisms for moving loose aggregate within the AONB.
- Height of structures associated with temporary beach landing facilities.
- Assessment of increased vehicle movements within the development site (inside the AONB) associated these proposed changes.

The AONB Partnership concurs with the findings of a report, in para 3.2.4, it commissioned¹ that state the impacts on the AONB include:

- *Loss of tranquillity, due to noise from hopper usage and movement of aggregate*
- *Further loss of tranquillity due to use of night time lighting*
- *Loss of naturalness of the coast and simple geometry through the introduction of new manmade elements*

These changes **will have negative impacts on the defined characteristics of the AONB** including landscape quality, scenic quality, relative tranquillity, relative wildness, natural heritage features.

There appears to be no detailed assessment of the impacts of the proposals in relation to the statutory purpose of the AONB, to conserve and enhance natural beauty. The AONB Partnership considers that such an assessment should be undertaken to demonstrate the applicant's duty to the purposes of the AONB.

- 3) The AONB Partnership considers that the proposals would **virtually double the width of the development site during construction** in a west to east orientation. It is considered that this would increase the impact of the development during construction phase from receptors within the AONB to north and south.

Furthermore, **the increase in vessels in near shore waters** using the beach landing facilities will negatively impact the qualities of the AONB and Heritage Coast. The AONB Partnership consider that the applicant should assess the visual and tranquillity (noise and light) implications of the proposals on receptors within the AONB. It is considered that the line of sight and direct line of noise from the temporary beach landing facility will be significantly increased.

The Alison Farmer Associates report¹ makes the following comment on this topic:

The consideration of the four Temporary Beach Landing Facilities will require a comparison of the visual effects of each. Use of Zone of Theoretical Visibility for each option will help to demonstrate how a longer length of pier will give rise to increased visibility of structures in the offshore environment and thus along the coast. This will also inform how this increased visibility may affect the special qualities of the AONB

Particular viewpoints which will need review include: 6, 17, 26 and 31.

- 4) The AONB Partnership considers that the proposals will have a significant impact on the experience of being in a nationally designated landscape through **a significant increase**

¹ Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020

in the number of vessels in inshore waters adjacent to the AONB and within the Heritage Coast area 24 hours a day, ie with lights in a dark area. These ship movements will impact on the scenic quality, relative tranquillity, and relative wildness of the AONB. As the Alison Farmer Associates¹ report puts it:

the more activity and deliveries by barge the greater the effects on landscape character and special qualities of the AONB

- 5) The AONB Partnership has concerns about the proposals impact on access to parts of the AONB that are currently publicly accessible, such as the route of **the Suffolk Coast Path, that may shortly become part of the England Coast Path National Trail**. The consultation document states:

*The coast path would remain open during construction, operation and removal of the temporary BLF [Beach Landing Facility] **as far as it is reasonably practicable and safe to do so.*** [our emphasis]

The **lack of detail in this statement does not allow for appropriate assessment of the impacts on access** within the nationally designated AONB, along a promoted Long Distance Route and the likely route of a National Trail.

- 6) The AONB Partnership recognises natural heritage features as part of the defined characteristics of the AONB. **The proposed crossing of the Site of Special Scientific Interest (SSSI) will have significant negative impact on both the landscape quality of the AONB and the wildlife contained within it.** The loss of SSSI to this proposal is regrettable and cannot be satisfactorily offset. The AONB Partnership considers that the best mitigation for this part of the proposal would be a SSSI crossing that incorporated a triple span bridge rather than the proposed culvert design. It considers this to be preferable as:

- This design would seek to minimise negative impacts on wildlife.

- 7) The AONB Partnership commissioned Alison Farmer Associates² to undertake a review of the proposed changes. **The report identified a range of information that was missing from the consultation document** that would be required to understand the impacts of the changes on the AONB. These are reproduced below:

- *Width and height of pier and hopper.*
- *Layout plan showing both Temporary and Permanent Piers, hopper, conveyor, access road, coastal path, sea defence, main construction site and any new temporary storage facilities for aggregate.*
- *Underpass of coastal path beneath the conveyor (noted on page 50 table 3.7 of PEI).*
- *Zone of Theoretical Visibility of enhanced beach landing facility options and in association with temporary beach landing facility – consideration of design of structures to work visually together.*
- *Assessment of cumulative effects of structures on the foreshore.*
- *Liaison with assessment of noise/vibration and recreational effects. The former should include effects on users of the Coastal Path.*
- *Confirmation that no aggregate or delivered materials will be stored on the beach and that it will be directly transported to stockpiles within the main construction site.*

² Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020

- Confirmation that no vehicular access onto the temporary beach landing facility pier is required and that the pier will only accommodate the conveyor.
- Details of proposed lighting.
- Preparation of new visualisations showing day and night time views and cumulative effects.
- Information of length of time it takes to unload a 3,000 tonne delivery from one barge.

The conclusion of the Alison Farmer Associates³ report states:

- ***The proposed alterations for delivery of freight to the site especially during construction has sought to enhance the capacity for sustainable freight transport and at the same time respond to stakeholders advocating the maximum use of rail and sea. The proposed enhancement of the Permanent Beach Landing Facility and options for a temporary Beach Landing Facility seek to address this, nevertheless, they will give rise to additional structures and activity within the AONB. These proposed changes will see additional negative impacts on the defined qualities of the nationally designated in the proposed development area***
- ***The Environmental Statement identified that there would be significant adverse effects on the landscape, visual receptors and special qualities of the AONB in the vicinity of the site and along the coast to the north/south. The proposed changes to the PBLF and possible addition of a Temporary Beach Landing Facility will not alter the category of effects where they are determined as already significant adverse. However, from some locations further along the coast, the proposed changes may result in an increase in effect and this will need to be clearly set out.***
- ***In reaching an optimum balance between road, rail and sea transportation of materials it is essential that the high value of the AONB coastal landscape is given sufficient weight in decision making. It does not appear from the current documentation that an assessment of that balance has been undertaken.***
- ***The proposed changes to the Development Consent order application would increase the harm to the defined AONB qualities in this part of the nationally designated landscape. Any preferred Beach Landing Facilities proposals should demonstrate minimisation of adverse effects on the AONB through careful design and mitigation.***

The AONB Partnership considers the proposed changes to the Sizewell C will substantially increase the negative impacts on the nationally designated AONB and Heritage Coast. It cannot support the proposals in the current form due to the unacceptable level of negative impact on the nationally designated landscape.

Simon Amstutz

AONB Manager

On behalf of Suffolk Coast & Heaths AONB Partnership

³ Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020

RESPONSE OF WALBERSWICK PARISH COUNCIL TO 5TH SIZEWELL C CONSULTATION

From the start of consultations, local communities, including Walberswick, have pointed out the severe logistical, economic and environmental flaws in EDF's plans for Sizewell C. Each time, EDF has proceeded with its preferred options rather than seriously addressing consultation input. In this unexpected 5th consultation, EDF seems to be again dangling transport options without any indication whether these options are deliverable. It is also unclear why, having dismissed such sea and rail options in earlier rounds, EDF is now suggesting these could be put back on the table. While we would welcome the opportunity to consider any serious alternatives to the current DCO, the proposals in this consultation unfortunately do not meet this test. In particular, none of the proposals related to rail or sea transport are guaranteed and none contain analysis on which to judge whether they would alter the impact on local communities, the environment, coastal processes or the construction timeline for the better or for the worse. There is also nothing in any of the proposals to move forward the timeline of measures to avoid EDF undertaking years of construction without any transportation mitigation measures whatsoever. There are no meaningful changes to address the severe environmental impacts on the natural environment.

Points of particular concern

- **Rail:** In earlier consultations, WPC supported more use of rail. The proposals offered by EDF, however, would depend on considerable changes being accepted by Network Rail including in passenger train timetabling. Even if this were feasible or likely, the possible decade of disruption of the rail movements in Suffolk and beyond, may be untenable. Moreover, the impact of 7 trains at night, without a much stronger commitment by EDF to mitigation measures, would have a devastating impact on all the communities along the rail line.
- **Sea:** In earlier consultations, WPC supported more use of sea transport. However, in the possible options in this consultation for the temporary and/or permanent beach landing facility, EDF does not provide evidence that the plans are feasible, environmentally sound nor whether they would negatively impact on coastal erosion and coastal communities north and south of the site. Moreover, given that EDF has not made clear where its aggregate would come from, even if sea facilities were built, there would be no guarantee that HGVs would be taken off the road.
- **Failure to address 'early years':** These new proposals would not have any impact on reducing road traffic during at least the first two years prior to the completion of any new roads, Park & Rides, rail or sea options. This would see 600 lorries per day, plus workers and those for other Energy Projects in the area using the current A12 and connecting B roads. This is completely untenable and unacceptable. No work must start until transport mitigation is fully constructed.
- **Sea Defences.** EDF proposes to increase the minimum height of the permanent sea defence from 10.2m to 14m and up to 15m with the adaptive option, in order to *"provide confidence the defence will be sufficient"*. But as many others point out – both in this consultation and in the DCO, EDF has not submitted a complete design.

We have severe concerns that the sea defence would increase erosion north and south of Sizewell, as the new defence starts 8 metres closer to the shoreline and plans for future adaptations will encroach even further into the beach. Moreover, EDF itself says that they cannot predict impact more than 10 years into the future – a disaster for a project that will not even begin to contribute to carbon neutral until 2040 and will have spent fuel onsite for a hundred years after that and the site would not be decommissioned until 2190. As a coastal community, already suffering from coastal erosion, Walberswick cannot support any proposals that will accelerate coastal erosion and certainly cannot give support to any plans that are not fully developed and provide full environmental impact analysis.

- **Destruction of AONB, SSSI and impact on Minsmere:** EDF is proposing new compensatory fen meadow habitat at Pakenham in West Suffolk. Like the other two compensatory habitats proposed at Benhall and Halesworth, the Pakenham site is miles away and does not adequately compensate for rare fen habitat loss in the Sizewell Marshes SSSI. It does not explain how species like the Marsh Harrier, which was saved from extinction in the UK because of the AONB and Minsmere, will be protected by putting compensatory habitat dozens of miles away. Legally, compensatory habitats that are at least equivalent to those lost must be put in place before construction. We support the view of Suffolk Wildlife Trust that EDF's plans are nowhere close to mitigating the impact on the environment.

In conclusion, there is nothing offered in this consultation that can alter our objection to the Sizewell C project as it currently stands.

Farnham with Stratford St Andrew Parish Council

Response to EDF Consultation on Proposed Changes to the Development Consent Order for

Sizewell C Nuclear Power Station



TWO VILLAGE BYPASS

Changes to the Application Order Limits

The changes proposed are to ensure a 215m visibility distance is maintained as required for a 60mph road. The parish council objects to a 60mph speed limit on this road due to the close proximity of residents and the subsequent noise and vibration from traffic travelling at this speed. The original proposal was for a speed limit of 50mph which the council considers more appropriate.

EDF are undertaking further speed survey work on the access road and we suggest the speed limit generally be revisited as part of this work.

Public Rights of Way changes

EDF are proposing changes to the Public Right of Way around Walk Barn Farm. This would formalise the route already used by the public as the current PROW is poorly signposted. The parish council prefers the proposed option 2a rather than 2b as this is the route already used by most walkers and is less complicated than option 2b.

The parish council agrees the proposal to upgrade the footpath to a bridleway as requested by Suffolk County Council. The landowner has already given permission for a local rider to use the route so formalisation would make sense.

Proposed route of the two village bypass

In addition as stated in previous consultations and our Relevant Representation to the Planning Inspectorate we are still wholly dissatisfied with EDF's intransigence in continuing to single-mindedly pursue a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment which has the support of our residents, this parish council, our neighbouring Benhall & Sternfield Parish Council, our County Councillor and others.

Increased use of rail/sea

The parish council is in support of any changes that will take additional traffic off the road.

EDF's new proposed changes to its DCO application to build a new nuclear power station at Sizewell do not change the East Suffolk Liberal Democrat's (ESLD) position on the project: we remain firmly opposed to the construction and operation of a new nuclear power station at Sizewell.

The changes EDF have proposed in this 5th consultation do nothing to alleviate the overall environmental, economic and social damage to the East Suffolk area and consequently to the wellbeing and livelihoods of its residents. The new proposals simply shift the negative impacts.

Worse still, it is clear from the presentation of the proposals that EDF is unsure of the viability of these proposed changes while at the same time, given the scale and scope of detail of the document, we question why EDF could not have made these proposals in its PINs submission a few months ago. Both of these facts further undermine EDF's credibility and so are further cause for concern.

Regarding the new proposals:

- Traffic: the proposals *might* reduce the HGV traffic, but they will not reduce the anticipated bus, LGV and car traffic. The traffic volumes will still be the cause of significant CO₂ emissions, air pollution and congestion and will still present a very real threat to road safety. These traffic impacts will be most extreme on the A12, on the routes leading into the site and at and around Felixstowe. If the project goes ahead, we reiterate that a 4-village by-pass is essential, that the D2 relief road must be built (rather than the proposed link road) and that they and all associated transport infrastructure must be completed and ready for use at the start of the construction of the power station. These measures might go a little way toward mitigating the negative impacts of the projected traffic volumes.
- Coastal damage: the proposals to increase the use of sea freight will require significantly more infrastructure for sea defences and freight unloading on the vulnerable and changing coastline which will increase further the probability of detrimental effects on the eco-structure of the fragile Suffolk coastline.
- Rail transport: the new proposals will result in increased night-time rail transport which will further impact upon residents of the towns along the route. EDF has recognised as much saying that the rail transport will present 'a major adverse effect' both in terms of noise and potentially damaging vibrations for residents along the rail line. If the project is to go ahead, the only effective solution to avoid night-time resident disturbance is to enhance the capacity of the route by doubling the line and so eliminating the need for overnight freight movements. This is not an ideal solution, but coupled with EDF's suggested approach of providing double glazing and sound insulation to affected residents, it would mitigate the worst impacts.

The new proposals do nothing to alleviate a wide range of other significant longer-standing concerns:

- Destruction of the environment: the construction will cause extensive noisy, dusty and unsightly development in a beautiful coastal environment which includes the Minsmere RSPB nature reserve, Sites of Scientific Interest and which is a designated Area of Natural Beauty.

- Social impacts: the construction of the site will bring thousands of workers to an area which already experiences pressures on housing, blue-light services, health services and recreational facilities.
- Overdevelopment: housing 3000 workers will require a campus completely out of keeping in size and form with the local area and the construction of a large site caravan park. Further south, the proposed use by EDF of Innocence Farm in Kirton is most unwelcome, especially as the Planning Inspector (in the review of the Suffolk Coastal Local Plan) recently rejected the use of the same site for the expansion of the Port of Felixstowe. While EDF may utilise the site for only 10-12 years it would become a brownfield site and therefore be re-opened to future industrial or housing development.
- All of the above will significantly reduce the appeal of the area to tourists and so damage one of the largest providers of employment and business of the area. At the same time, the construction will not generate the stated local economic benefits as most of the workers are expected to be employed from outside of the area.

In conclusion, the new proposals do not change ESDL opposition to the construction of a new nuclear power station at Sizewell as they do not reduce the overall negative environmental, economic and social impacts that the construction would wreak upon the area. Moreover, the new proposals do nothing to enhance EDFs credibility – the fact that EDF is unsure of the viability of these new proposals which have been put forward seemingly as an “afterthought” to the PINs submission this summer raise further questions as to EDF’s appropriateness to undertake such a project. And lastly, there is the question of the value and purpose of the power station itself. ESDL reiterate our view that the power station will prove to be a very costly white elephant:

- the agreed price/KWhr is significantly more expensive than the current cost of renewable power generation and by the time the power station is completed the price difference will be greater still; furthermore, the recent news that China General Nuclear Power is considering withdrawing from the project means that the Government is now having to consider taking a financial stake – if this happens, consumers will again pay the price
- the national debate on energy has also moved on significantly since the project was first announced; given renewable electricity generation trends and other available energy generating solutions, it is questionable whether there will be a need in 2034 for the power that Sizewell C is planned eventually to generate.



Public Health
England

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PINS Ref: EN010012

Our Ref: 53802/55501

FAO: Carly Vince
info@sizewellc.co.uk

16th December 2020

Dear Ms Vince,

**Nationally Significant Infrastructure Project
Public Consultation for the Sizewell C Project, Suffolk [PINS Reference: EN010012]**

Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals at this stage of the project. Our records show that we have previously responded to the following enquiries / consultations regarding this proposal:

- | | |
|---|---------------------|
| - Stage 1 Consultation: | 7th January 2013 |
| - Request for Scoping Opinion: | 22nd May 2014 |
| - Stage 2 Pre-application consultation: | 31st January 2017 |
| - Stage 3 Section 42 public consultation: | 28th March 2019 |
| - Scoping consultation: | 20th June 2019 |
| - Stage 4 Section 42 Public Consultation: | 26th September 2020 |
| - Registration of Interest: | 30th September 2020 |

It is understood this public consultation is being undertaken by the applicant and that in January 2021 the applicant will be submitting a formal application to change the proposals to the Planning Inspectorate. Following review of the public consultation documents provided, PHE have no further comments at this stage and will undertake a further review following submission of the formal application.

Please do not hesitate to contact us if you have any questions or concerns.

Yours sincerely

On behalf of Public Health England
nsipconsultations@phe.gov.uk



UFFORD PARISH COUNCIL

17th September 2020

Letter sent to:

Dr Therese Coffey MP
Mr Steve Gallant, Leader East Suffolk Council
Mr Matthew Hicks, Leader Suffolk County Council
Sizewell C Planning Inspectorate case team

Dear Sir/Madam,

Re: Sizewell C Development Consent Order

Ufford Parish Council would like to register their objections to the construction of Sizewell C and to oppose the granting of a Development Consent Order. We have already written during the consultation process at stages 3 and 4, but do not wish the impression to be gained that the reasons for objection have been overcome. Our reasons fall into the following chief headings:

Flawed Transport Strategy

We are particularly concerned about EDF's plans for an "integrated transport strategy, which in reality would see a very significant proportion of the construction and other materials transported by road. By comparison at Hinkley Point a much smaller proportion is road-based and EDF and its partners have invested heavily in sea and rail supply capability. The scale of the lorry and construction machinery traffic proposed for Sizewell C is unacceptable, as it will have significant impact on local communities, road infrastructure and the environment, as described in more detail below.

We urge the Planning Inspectorate to require further consideration of the transport and supply strategy in favour of greater use of sea and rail transport.

Traffic Congestion and Pollution

The plans include 1,140 HGVs and 700 buses a day travelling along the A12 and local roads, with peak numbers during the morning rush hour at the height of construction. This does not include the vans and cars which will travel either to Sizewell or to the southern Park and Ride planned to be located just north of Wickham Market.

The impact of this additional traffic will be huge to our local community. The A12 is already very busy. People from Ufford use Wickham Market as a local service centre, and deplore the plans which do not include realistic mitigation for the impact of vehicles coming to the Park and Ride. Particularly the effect on the B1078 along its entire length, and particularly in Coddanham. Undoubtedly this is a short cut to the westbound A14 used by many local people, and there is no practical way to prevent the construction workers using this route to Wickham Market.

We are also concerned about smaller local roads if a problem occurred causing closure of the A12. Then the B1438 would become a route bringing HGVs right through Ufford.

Light traffic will almost certainly find routes through villages to avoid queues and we also fear use of the A1152 down Woods Lane, through Melton and informal use of sites at Bentwaters for parking up and storage.

We understand that Suffolk County Council has cited “significant concerns” over transport, design and environmental impact in the plans for Sizewell C submitted by EDF Energy and we strongly share the concerns that they have outlined.

Local Environment

Noise, light and air pollution will threaten local wildlife habitats. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty will be harmed by this project. The RSPB says it could be “*catastrophic for wildlife*” at their renowned Minsmere Reserve. Suffolk Wildlife Trust also opposes Sizewell C.

Local residents will lose the amenity of the beautiful coast that they cherish.

Jobs and Business

EDF will bring most of the supply chain and workforce from Hinkley to save money and, they have stated, to speed up the process. 6,000 workers will be brought in, risking social problems locally. EDF says 2,600 workers will be recruited locally, but this could include commuting from up to 90 minutes away.

Tourism would very likely be lost. The Suffolk Coast tourism body suggests that tourists “*will seekpeace and tranquillity elsewhere*”. That would mean a loss of jobs and existing businesses damaged.

Conclusion

These objections are based on the predicted local effect of the plans that EDF have put forward.

Yours sincerely,



Judi Hallett
Clerk to Ufford Parish Council

cc. Cllr. Alexander Nicoll, Suffolk County Council
Cllr. Carole Poulter, East Suffolk Council
Woodbridge Town Council



Middleton-cum-Fordley Parish Council
Response to EDF Sizewell C
Post-DCO Application Public Consultation Stage 5
13th December 2020

The village of Middleton-cum-Fordley lies between the B1122, which crosses Middleton Moor on its way from Yoxford to Leiston, and the B1125, which connects Blythburgh with the B1122. Each of these roads is expected to be subject to profound additional traffic during the construction of the proposed new twin nuclear power station at Sizewell (SZC). As such, its residents, many of whom live within a few metres of the edge of these roads, will be heavily affected, while others will be subject to delays and frustration trying to join these roads when exiting the village.

Middleton PC has robustly responded to each of the previous four Stages, lamenting the dire lack of information provided on a range of extremely important issues, effectively preventing meaningful conclusions from being reached. In addition to our conviction that the two aforementioned roads do not have the capability of absorbing the envisaged traffic levels, their use will cause intolerable delays, disruption, greater incidence of accidents and health issues from pollution upon the residents living on those routes. We have also expressed considerable concern regarding other matters:

1. The destruction of natural habitat and effects on wildlife at Minsmere and areas designated AONB and SSSI;
2. The disfiguring of the area's beauty and tranquillity;
3. The effects upon the local tourist economy;
4. The disruption caused to, and by, the inevitable clash of agricultural vehicles with construction traffic;

5. The additional pressure likely to be imposed on health services, schools, policing and social services;
6. The inadequate explanations concerning EDF's plans for the source of water for construction, the monitoring of water table levels and appropriate sea defences.

We expected, therefore, that Stage 5 would properly address at least some of these issues. In fact it does nothing to allay the concerns we have set out above and in our previous responses. It merely tinkers with some of the Stage 3 and 4 proposals, while couched in "ifs, buts and maybes".

We reiterate that the lack of substantiated information provided by EDF has made an utter nonsense of every stage of the consultation process. The timings of each of these consultations have been ill-judged, aligned with periods when respondents are on holiday or heavily concerned by other matters, while the options they have proposed for consideration have frequently been misleading, irrelevant or slanted to provide EDF with their preferred answer.

1. We are not convinced that any benefits of proceeding with SZC will outweigh the profound degree of detriment, a view shared with more than two dozen other local councils, Suffolk County Council and the Environment Agency. We therefore still draw the same conclusion as that expressed in our previous responses, viz:
 1. We do not accept that there is a need for any new nuclear power station to be in the Suffolk AONB.
 2. The negative impacts of the proposed development of SZC are so severe that adequate mitigation is not possible.
 3. There is considerable doubt that a twin reactor station can be successfully accommodated within the allocated 32-hectare site, leading to yet more clandestine land-grabs.

Stage 5 offers nothing in the way of succinct information on any of the vital topics mentioned above.

1. It proposes a "possibly this, possibly that" transport strategy of an extra train, to the additional annoyance and disturbance of the dozens of residents close to the line and always subject to agreement with Network Rail, and a larger beach landing facility, with the threat to coastal erosion and upset to marine life, while subject to the feasibility of its construction and the (unpredictable) effects of weather and tides.
2. It proposes a 30metre "bridge" (actually a wider version of the originally proposed culvert) that is not expected to assist the transit of wildlife and does not lessen its impact on the SSSI.
3. An additional wildlife sanctuary in West Suffolk, with no explanation of how threatened flora or small animals will find their way there, nor how migratory birds will be redirected.
4. Misleading sketches indicating small revisions to the proposed sea defences, which do not define their depth or how much further forward towards the sea they have been moved. Despite EDF's statement that the design is based on 'current good science', it suggests that the basic protection of rock armour will be covered over, thus negating its requisite wave-breaking purpose!

Middleton's previous response therefore remains relevant and unaffected by anything that has arisen from this latest consultation.

Transport Strategies

While the maximum use of rail is to be welcomed, we are concerned at some of the ramifications that could arise, as outlined by EDF within Stages 3 and 4.

The possible closure or revision of several foot or road level crossings would create considerable hardship for some residents.

The new link road would not be built initially, imposing traffic levels on the B1122 even higher than those envisaged at Stage 1, which were seen even then as beyond the road's capability and a totally unacceptable imposition on residents along the route. It is therefore fundamental that a new access road is built before any work starts on site.

On the subject of a new access road, the route should be the original D2 (or the similar W) and not the 'Link Road' first raised in Stage 3 and perpetuated in Stage 4. This Link Road offers no legacy benefit, will noticeably scar the landscape, rob or render useless productive farmland and sever vitally important side roads that would provide local residents (in Theberton in particular) a safe egress from their village.

Concern was raised in our previous Responses regarding the methodology being used by EDF for traffic modelling. From the scant information revealed during discussions with EDF Transport personnel at their past presentations, the clear impression gained is their modelling has provided for regularly spaced traffic, allowing them to declare that the roads have sufficient capacity. Local knowledge, experience gained from the construction of Sizewell B and observation of even present day volumes shows this not to be the case. The traffic tends to bunch up into strings of vehicles, sometimes quite long. With the huge additional numbers projected during even the early years of construction, this will lead to long tailbacks and severe delays at Woodbridge and Martlesham, and potential gridlock at Yoxford.

That their traffic modelling is suspect is borne out by experiences to date at Hinkley. The entire area around Bridgewater continues to be subject to frequent day-long traffic jams, causing delays sometimes of more than an hour. A spokesperson for EDF has stated that this has at times been due to road repairs and water supply fractures, beyond their control. That may be so, but with the huge increase in traffic, much of it heavy, to which these roads are being subjected, failures are to be expected and should have been built into EDF's modelling. This was clearly not done.

Other Concerns

It is now open to serious question as to whether or not the Sizewell site is a suitable location or an adequate size for a twin station. From the Government's NPS paper EN-6, Sizewell was merely listed as a 'potential' site, though its location on a fast-eroding coast and among such fragile surroundings, along with its many detrimental impacts on local life, now call this into doubt. In ecological terms, it would be difficult to find a less suitable site anywhere in England.

From that same paper, it is stated that a single nuclear station site will generally require 30 hectares. As a guide, the Hinkley twin station will occupy 45 hectares on completion. Yet SZC is expected to be wedged into just 32 hectares. It makes no sense just reading it, and a recent event illustrates it cannot be done in practice. The locally cherished Coronation Wood is being destroyed and part of a nearby public amenity area called Pill Box Field is under threat ahead of EDF even obtaining development consent, to make more room

available. There is every reason to believe that there may be further examples of underhand land-grabbing like this.

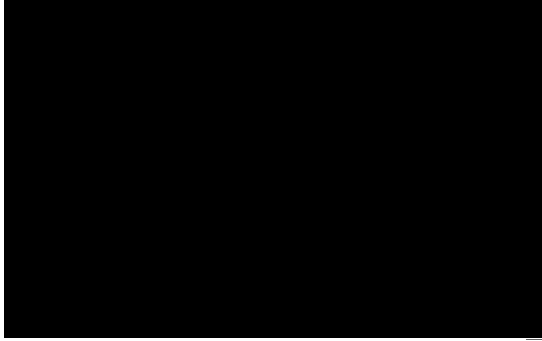
Conclusion

Over the 8 years since Stage 1, we have observed the constancy of two things – the lack of adequate information or evidence provided by EDF to substantiate any of their proposals or claims, and the arrogant disregard of the meaningful input of knowledgeable local people in the 5 rounds of ‘Consultations’.

Small wonder, therefore, that the attitude of Middleton Parish Council has hardened from one of growing concern to the deepest suspicion of EDF’s competency. The resultant mistrust has led to our total opposition to the building of SZC. This project will bring death and destruction to East Suffolk’s natural habitat and human population, the latter by way of increased road accidents, delays to emergency services and a rise in health issues among the very young and old from worsening pollution.

FRAMLINGHAM TOWN COUNCIL

Town Council Office



Visit our website: www.framlingham.com



Town Council Chairman:

Cllr Philip Collins

Town Clerk/ Responsible Financial Officer:

Mrs Eileen A Coe CILCA AICCM PSLCC

Deputy Town Clerk:

James Overbury BA (Hons)



16th December 2020

Dear Sir or Madam,

Framlingham Town Council have prepared the following response to the current 30-day consultation at <https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/proposals> as follows:

Framlingham Town Council supports the use of transport by rail or sea in preference to road transport, but this must not have an adverse impact on the rail passenger service on the East Suffolk line. Any reduction in the number of passenger trains, worsening of journey times or diminishing the efficiency and timing of connections to mainline services is unacceptable.

- Construction traffic for Sizewell C should maximise use of rail transport by increasing capacity, for example by additional passing loops, or by partial or total doubling of the single track line between Woodbridge and Saxmundham. The aim should be to prevent disruption to passenger services while greatly increasing freight capacity (beyond the increased “ambition” of 30-50% outlined in the consultation document), and has the added benefit of increasing future flexibility for passenger services.

Yours faithfully,

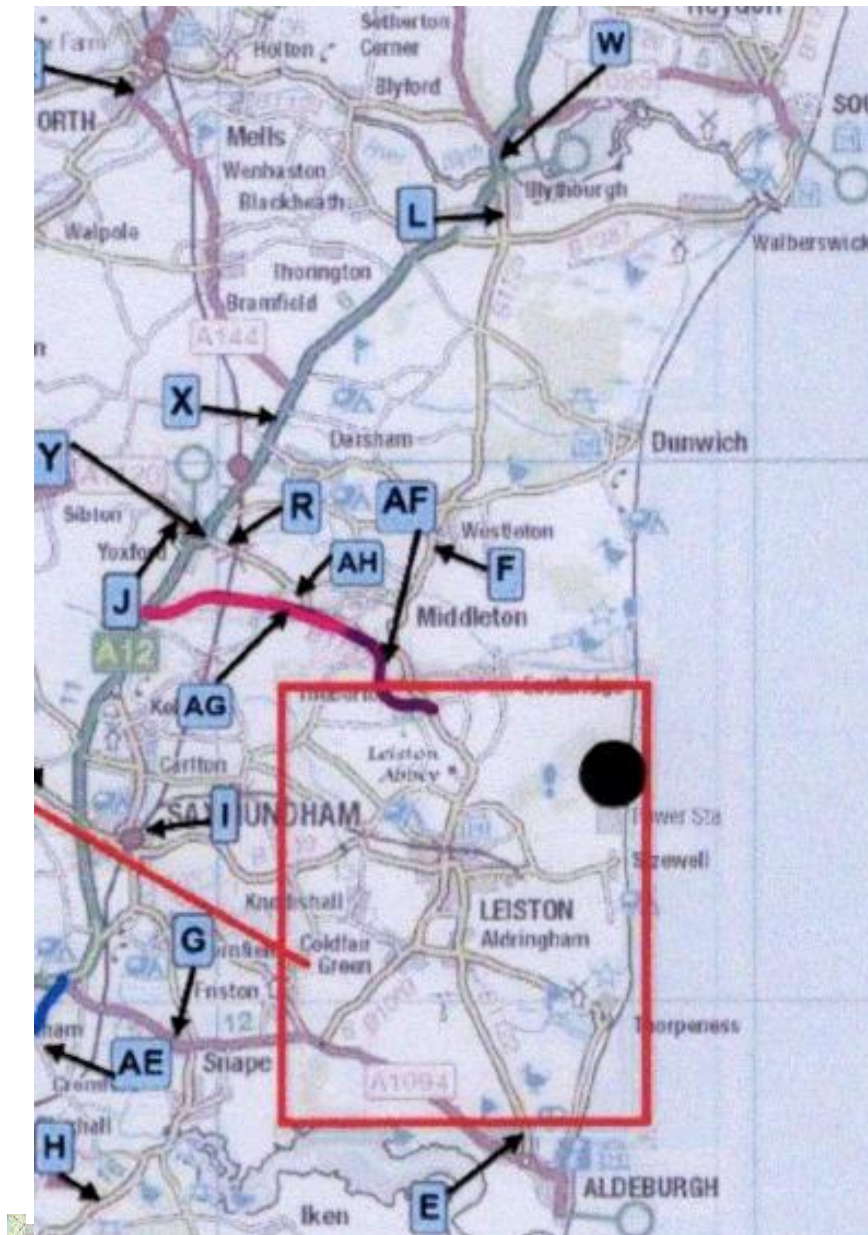
James Overbury

Deputy Clerk

SIZEWELL C Proposed Nuclear Development

Consultation on Proposed Changes Nov 2020 to Dec 2020

Response from the Parish Council for Blythburgh with Bulcamp and Hinton



DECEMBER 2020

Sizewell C Proposed Nuclear Development: Consultation on Proposed Changes Nov to Dec 2020

Response from the Parish Council for Blythburgh with Bulcamp and Hinton

1. BACKGROUND: CHARACTER AND LOCATION OF BLYTHBURGH

1.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a parish in northeast Suffolk, nine miles north of the Sizewell C site. Blythburgh's small village has grown up straddling a trunk road, now the A12, created in 1785. The parish has approximately 300 residents (see cover page map for the location of Blythburgh in relation to Sizewell).

1.2 Blythburgh is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with tidal river, marsh, heath, small woods, pasture and arable fields. AONBs have the highest level of protection in relation to landscape and scenic beauty (National Policy Statement for Energy (EN-1), section 5.9.9).

1.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village, protected by a conservation area.

1.4 Blythburgh should be considered as, and protected as a heritage asset, in terms of NPS (EN-1), sections 5.8.2-4.

1.5 Blythburgh is a very popular tourist destination. Visitors keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the year. The visitors include church lovers; artists; birdwatchers; music lovers and others who come seeking relaxation in a rural environment.

1.6 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.

1.7 Blythburgh village is divided physically and mentally by the A12 trunk road and the B1125. The roads pass through the centre of the conservation area. Existing problems will be exacerbated by the Sizewell development: traffic density and speed; dangerous bottlenecks and junctions; the lack of safe crossing points for pedestrians; discontinuous footpaths, and the impact of rat-running vehicles on the B1125.

1.8 Equally, the demographics of Blythburgh are important to understand. The parish has an ageing population. Although this is not uncommon in Suffolk or other parts of the country, its significance in relation to the proposed development of Sizewell C is that many residents of Blythburgh will live through the negative impacts of the construction period, but are unlikely to enjoy any of the potential benefits. Blythburgh

parish council therefore urges that this is taken into account in relation to mitigation (Appendix 1 refers) and compensatory action and expenditure.

1.9 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh parish council is therefore keen to ensure that any development of Sizewell C takes this into account.

2. EXECUTIVE SUMMARY

Blythburgh Parish Council would like to state the following:

- as this latest (and unexpected) Consultation (i) comes after the DCO has been submitted, (ii) our associated Relevant Representation has been made, and (iii) following four previous rounds of consultation, we would wish ALL our previous comments and requests for Mitigation to continue to stand
- for the avoidance of doubt, MITIGATION requested (Appendix 1 refers) applies to ALL eventualities regarding freight strategy for the construction of Sizewell C be it (i) as detailed in the DCO submitted or (ii) any amendment based on those detailed in this latest Consultation.
- we urge EDF to maximise the use of rail in a balanced transport strategy and provide mitigation against the worst impacts. There is not enough detail to allow us to comment on a “preferred option” but due regard should be given to balancing the benefits and dis-benefits of each scenario.
- the 3 options associated with increases in train movements are all described as “potential”. It is a concern that the “potential” increases in trains are not achievable but do provide EDF with useful ammunition to support the statement “we have listened to the concerns of key stakeholders”. We hope to be proved wrong.
- Using Table 3.3 (page 31), an increase of 1 train per day and operating an additional day per week appears to provide a significant reduction in HGV movements compared to the baseline of almost 60% (59.6%). Blythburgh Parish Council considers this to be a significant gain / improvement.
- We consider the limited use of a “by sea” strategy to have been a lost opportunity and are pleased that, even at this very late stage, feasibility studies may now be undertaken.
- We do not possess the necessary expertise to evaluate the relative merits of the by sea options under consideration but note the use of a jetty during the construction of Sizewell B reduced the necessity for many large loads being transported to the construction site by both road and rail.
- Under any by sea option, the impact on the marine and coastal environment must be balanced against what we consider to be significant benefits when measured against the not inconsiderable disruption to local populations and infrastructure links.
- Abnormal Large Loads being off loaded through the port of Lowestoft remain a concern due to the impact on the road infrastructure with no mitigation on the A12 at Blythburgh
- The baseline traffic figures given for Blythburgh location L remain a serious underestimate and our assertion is further supported by new data.

- issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed and we wish to reiterate our concerns in this regard and the need for mitigation;
- no consideration has been given to safety of the junction of the A145 and A12 despite this being a known accident prone junction
- habitat creation at Pakenham doesn't make up for loss of habitat and amenity in vicinity of Sizewell C site: Pakenham residents should be allowed to register and comment as interested parties
- Under all freight management options we would not wish to lose the 2 village by-pass

Appendix 1: Outlines the Parish Council's suggestions for mitigation against the worst impacts of increases in traffic flows.

Appendix 2: Parish Council's responses to Stage 4 consultation (note: also contains and references Blythburgh Parish Council's responses to Stage 1, 2 and 3 Consultations).

3. DETAILED COMMENTS

- 3.1 These representations are made on behalf of Blythburgh Parish Council. They were drafted by the council's Planning Advisory Group and agreed after discussion at a parish council meeting on 14 December 2020.
- 3.2 Blythburgh Parish Council consider that as this latest (and unexpected) Consultation (i) comes after the DCO has been submitted, (ii) our associated Relevant Representation has been made, and (iii) following four previous rounds of consultation, we would wish **ALL** our previous comments and requests for Mitigation to continue to stand. Appendix 2 contains Blythburgh Parish Council's responses to Stages 1, 2, 3 and 4.
- 3.3 For the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that their MITIGATION requests (Appendix 1 refers) apply to ALL eventualities regarding freight strategy for the construction of Sizewell C be it (i) as detailed in the DCO submitted or (ii) any amendment based on those detailed in this latest Consultation.
- 3.4 Blythburgh Parish Council has consistently supported a rail-led strategy with appropriate road usage supported by infrastructure developments. We continue to urge EDF to maximise the use of rail in a balanced transport strategy and provide mitigation against the worst impacts. EDF identify 3 possible scenarios to increase the number of trains but state p.32 section 3.2.7 "... each of these options is currently only potentially available...". There is not

enough detail to allow us to comment on a “preferred option” but due regard should be given to balancing the benefits and dis-benefits of each scenario. For example: running trains at night would minimise disruption to vehicular traffic caused by railway crossing point closures but night running would have a greater noise & vibration impact on residents living close to the track. This is a significant issue for some communities and Blythburgh Parish Council would support adequate mitigation for those living and working close to the train lines.

- 3.5 At Stage 4 EDF stated (Reference; Stage 4 Consultation Document, Section 3.1 page 61) “we have become concerned that the rail-led strategy may not be deliverable within the necessary timescale to limit the impacts of construction traffic”. Blythburgh Parish Council note that in this latest Consultation the 3 options associated with increases in train movements are all described as “potential” (for example: sections 3.2 a and 3.2 b,) and in section 3.2.9 it states “the potential is also being investigated to operate an additional train service, bringing the total number of trains to five return trains per day, although this is less likely”. It is a concern that the “potential” increases in trains are not achievable but do provide EDF with useful ammunition to support the statement “we have listened to the concerns of key stakeholders”. We hope to be proved wrong.
- 3.6 Using Table 3.3 (page 31) it would appear that the two baseline figures (taken from 3.3.15) would read “not given” and “406”. If this is correct then the potential operating scenario of 4 daily trains operating 6 day a week would reduce the daily HGV movements by an additional 243. In summary, an increase of 1 train per day and operating an additional day per week provides a significant reduction in HGV movements compared to the baseline of almost 60% (59.6%). Blythburgh Parish Council considers this to be a significant gain / improvement.
- 3.7 Blythburgh Parish Council considers the limited use of a “by sea” strategy to have been a lost opportunity and is pleased that, even at this very late stage, feasibility studies may now be undertaken. Blythburgh Parish Council do not possess the necessary expertise to evaluate the relative merits of the options under consideration but would wish to note that the use of a jetty during the construction of Sizewell B reduced the necessity for many large loads being transported to the construction site by both road and rail. Blythburgh Parish Council do also appreciate there will be an impact on the marine and coastal environment which must be balanced against what we consider to be significant benefits when measured against the not inconsiderable disruption to local populations and infrastructure links.

3.8 Furthermore, Blythburgh Parish Council has previously noted their concerns regarding Abnormal Large Loads that, under the current DCO strategy, will be off-loaded through the port of Lowestoft. These loads will make their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford . Little mention has been made of these loads and no mitigation (except a means to cut across the roundabout at the entrance to the Darsham Park & Ride and again at Yoxford) has been proposed regarding these movements. In the absence of an enhanced beach landing facility, we would again, draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to “pinch points” on the B1125 and the A12) and local air quality has already been raised but not addressed.

3.9 On the matter of traffic, the baseline traffic figures given for Blythburgh location L remain an issue. As previously communicated, the baseline figure of 1650 (total movement in both directions according to EDF) at point L is a serious underestimate. Blythburgh Parish Council met with EDF traffic expert on 29/3/2019 to discuss and hand over traffic data for this location measured on a regular basis over a number of years with a calibrated VAS monitor. The data handed over showed conclusively that the 1650 figure is a serious underestimate. In September 2020 Blythburgh Parish Council engaged Highways to undertake a “volume, speed and type” survey at this point over a period of 14 days. The total vehicle movements per day were **3200 per day** (~ 1600 vehicle movements northbound and a further ~1600 vehicle movements southbound). This is further evidence that EDFs baseline figure for Location L is a serious underestimate. EDF have identified Blythburgh Location L as one of the locations where “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”. We have little confidence in this assertion when the baseline figure at Location L is a serious underestimate and figures provided in a face to face meeting to discuss and demonstrate this have seemingly been ignored. New data independently measured also supports this assertion. Subsequent statements that “EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas...” would seem to be a tick box statement rather than a genuine wish to engage given our experience to date. It is to be hoped that this will change or that it will be mandated and monitored by the Inspector. Our suggestions for mitigation against the worst impacts of increases in traffic flows in already sensitive “pinch points” are detailed in the attached “Mitigation Table”.

3.10 Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed and continue to be of concern. We wish to

reiterate our concerns in this regard and the need for mitigation of both (i) rat running and (ii) fly parking. Blythburgh Parish Council urges EDF to use available technology to keep as much Sizewell generated traffic on the A12 as possible. Technology can also be employed to ensure that those who should be using the Darsham Park & Ride are doing so. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.

- 3.11 We continue to be concerned that no consideration has been given to the safety of the junction of the A145 and A12 despite this being a known accident prone junction. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction. Blythburgh Parish Council would ask that consideration be given to mitigation of these enhanced risks and ensuing traffic congestion.
- 3.12 It is the view of Blythburgh Parish Council that the additional proposed habitat creation at Pakenham doesn't make up for loss of habitat and amenity in the vicinity of the Sizewell C site. We also urge that Pakenham residents should be allowed to register and comment as interested parties
- 3.13 Under all freight management options we would not wish to lose the 2 village by-pass
- 3.14 EDF have previously requested comments regarding the consultation process and we again offer the following observations
 - 3.14.1 This Consultation was unexpected. It has occurred during lockdown with a 1 month response timescale. This has presented some challenges in coordinating responses.
 - 3.14.2 The negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1, 2, 3 and 4 Consultations do not appear to have been addressed at any stage including in the DCO. There is no references to mitigation action or expenditure of specific benefit to Blythburgh.
 - 3.14.3 There is still insufficient information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will be mitigated at all let alone prior to the commencement of the project. Questions on this have remained unanswered.
 - 3.14.4 There is a lack of clarity as to how EDF will handle responses to this Consultation and how these may feed in to the DCO process.

- 3.14.5 On the plus side, Planning Aid England have, again, been extremely helpful with aiding our understanding of the process and structuring of responses.

Appendix 1: Outlines the Parish Council's suggestions for mitigation against the worst impacts of increases in traffic flows.

Appendix 2: Parish Council's responses to Stage 4 consultation (note: also contains and references Blythburgh Parish Council's responses to Stage 1, 2 and 3 Consultations).

Appendix 1

Blythburgh Parish Council's suggestions for additional mitigation against the worst impacts of increases in traffic flows

Important note: For the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that these MITIGATION requests apply to all eventualities regarding freight strategy for the construction of Sizewell C

Issue Raised by Blythburgh Parish Council	MITIGATION Requested / Suggested by Blythburgh Parish Council
Abnormal Large Loads making their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford. We draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to "pinch points" on the B1125 and the A12) and local air quality has already been raised but not addressed.	EDF to work with Highways to confirm Blythburgh Bridge loading requirements and impact of these large loads on road subsidence on A12 at entrance (30mph) to Blythburgh village from the north. Baseline air quality survey at junction of A12 with B1125 and regular on-going checks during construction. If problem identified the appropriate amelioration measures should be taken.
Baseline traffic figures given for Blythburgh location L are an	We would like to understand why the figures we supplied 29/3/19 have seemingly been

<p>underestimate and this has been further confirmed by a traffic survey carried out by Suffolk Highways at the request and cost to Blythburgh Parish Council (September 2020).</p> <p>Blythburgh Location L has been identified by EDF as one of the locations where “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”.</p>	<p>ignored.</p> <p>Additional traffic on this road exacerbates an existing problem and mitigation is required: number plate recognition and other traffic calming measures to discourage use of this road are requested.</p>
<p>Blythburgh Parish Council has identified 2 main “pinch points” within the village which impact the flow of traffic on the A12. These will be exacerbated by SZC traffic</p> <ul style="list-style-type: none"> - Narrow entrance to the B1125 from the A12 causing tail backs on the A12 for traffic from the north and also traffic joining the A12 from the B1125 – the bus stop on the South bound side of the A12 (towards Ipswich) within the village blocks the carriageway and creates traffic tailbacks on the A12 towards the junction with the B1125 	<p>Number plate recognition on the B1125 to discourage rat running and enforce utilisation of the Darsham park & ride.</p> <p>School children using the school bus must cross A12 and the provision of a pedestrian crossing or refuge is required.</p> <p>Create a pull-off for the bus so that traffic on the south bound A12 is not disrupted? Moving the bus stop may be required?</p>
<p>Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed. We reiterate our concerns and the need for mitigation of both (i) rat running and (ii) fly parking. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.</p>	<p>Speed cameras with number plate recognition located on the B1125 in Blythburgh</p> <p>B1387 from its junction with the B1125 to the A12 should be improved as an alternative route for displaced traffic</p> <p>Village roads should be engineered to make them unattractive to through traffic</p>
<p>Safety of the junction of the A145 and A12. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction.</p>	<p>Consideration should be given to mitigating these enhanced risks and the ensuing traffic congestion. At the very least, a roundabout should be considered for this junction.</p>

Appendix 2

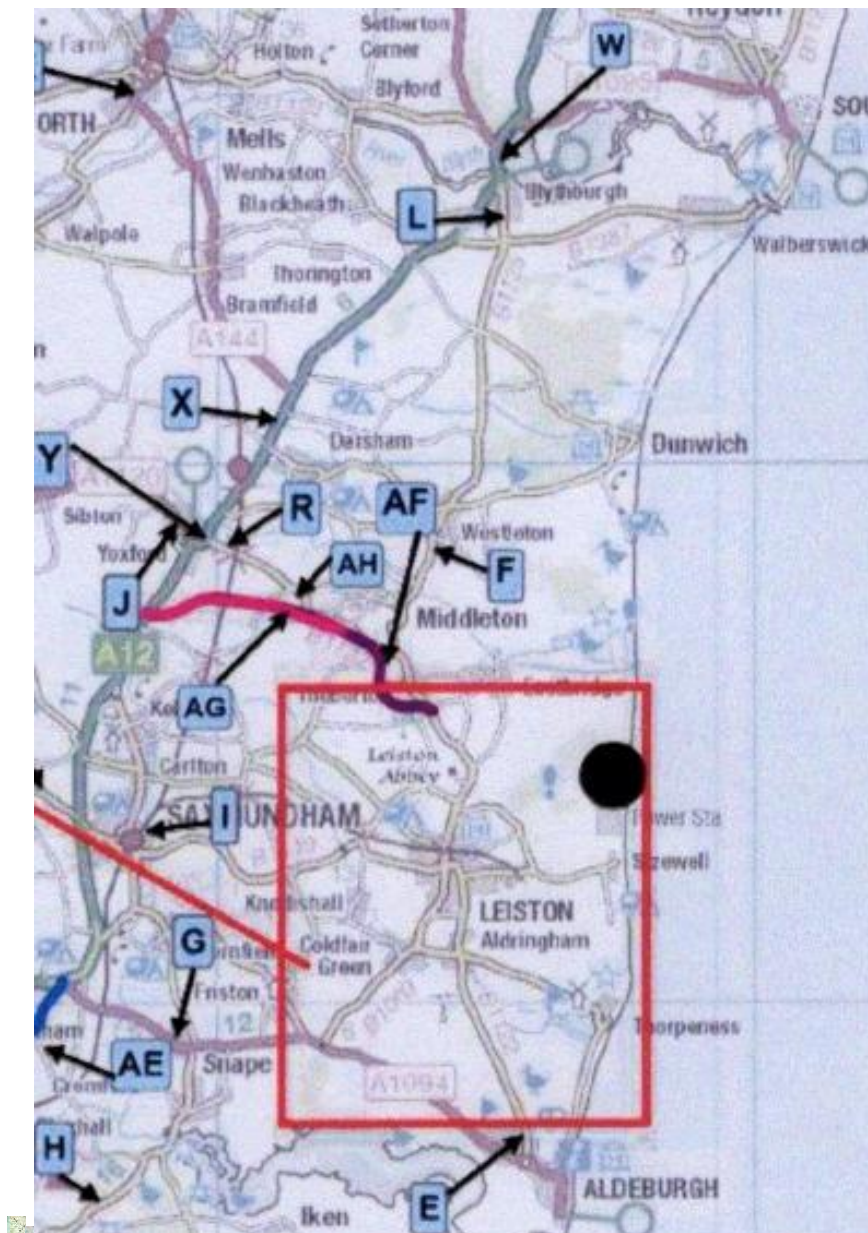
Parish Council's responses to Stage 4 consultation

(note: also contains and references Blythburgh Parish Council's responses to Stage 1, 2 and 3 Consultations).

SIZEWELL C Proposed Nuclear Development

Stage 4 Pre-Application Consultation

Response from the Parish Council for
Blythburgh with Bulcamp and Hinton



SEPTEMBER 2019

Sizewell C Proposed Nuclear Development: Stage 4 Pre-Application Consultation

Response from the Parish Council for Blythburgh with Bulcamp and Hinton

2. BACKGROUND: CHARACTER AND LOCATION OF BLYTHBURGH

1.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a parish in northeast Suffolk, nine miles north of the Sizewell C site. Blythburgh's small village has grown up straddling a trunk road, now the A12, created in 1785. The parish has approximately 300 residents (see cover page map for the location of Blythburgh in relation to Sizewell).

1.2 Blythburgh is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with tidal river, marsh, heath, small woods, pasture and arable fields. AONBs have the highest level of protection in relation to landscape and scenic beauty (National Policy Statement for Energy (EN-1), section 5.9.9).

1.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village, protected by a conservation area.

1.4 Blythburgh should be considered as, and protected as a heritage asset, in terms of NPS (EN-1), sections 5.8.2-4.

1.5 Blythburgh is a very popular tourist destination. Visitors keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the year. The visitors include church lovers; artists; birdwatchers; music lovers and others who come seeking relaxation in a rural environment.

1.6 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.

1.7 Blythburgh village is divided physically and mentally by the A12 trunk road and the B1125. The roads pass through the centre of the conservation area. Existing problems will be exacerbated by the Sizewell development: traffic density and speed; dangerous bottlenecks and junctions; the lack of safe crossing points for pedestrians; discontinuous footpaths, and the impact of rat-running vehicles on the B1125.

1.8 Equally, the demographics of Blythburgh are important to understand. The parish has an ageing population. Although this is not uncommon in Suffolk or other parts of the country, its significance in relation to the proposed development of Sizewell C is that many residents of Blythburgh will live through the negative impacts of the construction period, but are unlikely to enjoy any of the potential benefits. Blythburgh

parish council therefore urges that this is taken into account in relation to mitigation (Appendix 1 refers) and compensatory action and expenditure.

1.9 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh parish council is therefore keen to ensure that any development of Sizewell C takes this into account.

2. EXECUTIVE SUMMARY

Blythburgh Parish Council would like to state that:

- the Sizewell C Stage 4 Consultation is an addendum to, rather than a replacement for, the Stage 3 Consultation and as such would wish ALL their Stage 3 comments to remain valid;
- comments for Stage 4 address only the new option of “an integrated freight management strategy”;
- there is continued support for a suitable rail-led strategy augmented by certain road infrastructure improvements;
- the integrated strategy seems to merely to address concerns about the deliverability of the rail-led strategy and puts forward a worst of all worlds scenario;
- the Woodbridge to Saxmundham line should be dual tracked to remove further HGVs from local road network and provide legacy rail link to operational site;
- the limited use of a “by sea” strategy is a lost opportunity;
- little mention has been made of the Abnormal Large Loads and no mitigation (except a means to cut across the roundabouts at the entrance to the Darsham Park & Ride and at Yoxford) has been proposed regarding these movements;
- the baseline traffic figures given for Blythburgh location L remain a serious underestimate;
- it has little confidence in this assertion that “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”;
- issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed in Stage 4 consultation and we wish to reiterate our concerns in this regard and the need for mitigation;
- no consideration has been given to safety of the junction of the A145 and A12 despite this being a known accident prone junction; and
- it supports the retention of the proposed link road after construction to allow fast moving traffic to access the site whilst allowing the almost parallel road to serve more “local” traffic, tourists and cyclists.

Appendix 1 outlines the Parish Council's suggestions for Mitigation against the worst impacts of increases in traffic flows.

Appendix 2 provides a summary of parishioner comments raised in the Open Forum of the Blythburgh Parish Council Meeting held on 12 September 2019.

Appendices 3, 4 and 5 contain the Parish Council's responses to Stages 1, 2 and 3 respectively.

4. DETAILED COMMENTS

- 4.1 These representations are made on behalf of Blythburgh Parish Council. They were drafted by the council's Planning Advisory Group and agreed after discussion at a parish council meeting on 12 September 2019.
- 4.2 Blythburgh Parish Council consider that the Sizewell C Stage 4 Consultation is an addendum to, rather than a replacement for, the Stage 3 Consultation and as such would wish **ALL** their Stage 3 comments, including those on the Rail-led and Road-led strategies to remain valid (Reference: Stage 4 Consultation Document, Section 1.1.7 page 17). Appendices 3, 4 and 5 contain the Parish Council's responses to Stages 1, 2 and 3 respectively.
- 4.3 Blythburgh Parish Council has, therefore, focused their comments for Stage 4 to address only the new option of "an integrated freight management strategy"; their continued support for a suitable rail-led strategy augmented by certain road infrastructure improvements is re-iterated. However, for the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that their MITIGATION requests (Appendix 1 refers) apply to ALL eventualities regarding freight strategy for the construction of Sizewell C be it (i) rail led augmented by certain road infrastructure improvements, (ii) a road-led strategy or (iii) an integrated strategy .
- 4.4 It was with dismay, but not surprise, that Blythburgh Parish Council note EDF's comment (Reference; Stage 4 Consultation Document, Section 3.1 page 61) "we have become concerned that the rail-led strategy may not be deliverable within the necessary timescale to limit the impacts of construction traffic and accordingly at this Stage 4 consultation, we are seeking views on a further alternative freight management strategy option: an integrated strategy." Given that project timescales are driven solely by EDF, Blythburgh Parish Council fail to see and cannot accept that "the rail-led strategy may not be deliverable within the necessary timescale" is justification for abandoning the rail-led strategy detailed in Stage 3 and supported by many Stage 3 respondents.

- 4.5 Blythburgh Parish Council re-iterates their support for a Rail-led strategy augmented by some road improvements to facilitate the necessary increase in road traffic whilst maximising the use of rail to keep freight movements on the road infrastructure to a minimum. The apparently hastily conceived “integrated strategy” described in Stage 4 seems to merely to address concerns about the deliverability of the rail-led strategy as previously described and puts forward a worst of all worlds scenario where the devil is in the detail. *For example: Stage 4 Consultation Document, Table 3.2 page 65 shows that under the rail-led strategy the proposed HGV operation would be from 7am to 11pm with 225 HGVs at peak (450 movements). The “new” integrated strategy allows for HGV operation potentially over “extended hours” with a typical day peak of 325 HGV (650 movements). For the road-led strategy the equivalent figures allows for HGV operation again potentially over “extended hours” with a typical day peak of 375 HGV (750 movements).* The potential benefit of moving to the integrated strategy (as described) over the rail-led strategy when compared to the road-led strategy is neither obvious nor persuasive. Blythburgh Parish Council would reiterate their view that the Woodbridge to Saxmundham line should be dual tracked to remove further HGVs from local road network and provide legacy rail link to operational site. In order to gain real benefits we would urge that in addition to freight trains one of the rolling highway train systems should be considered.
- 4.6 The limited use of a “by sea” strategy is explained by EDF but Blythburgh Parish Council considers this a lost opportunity. The use of a jetty during the construction of Sizewell B reduced the necessity for many large loads being transported to the construction site by both road and rail. Whilst appreciating the previously described impact on the marine and coastal environment Blythburgh Parish Council would urge, even at this late stage, further exploration of this option and consideration of the benefits when measured against the not inconsiderable disruption to local populations and infrastructure links highlighted to date by the other proposed options.
- 4.7 Furthermore, Blythburgh Parish Council notes that under all strategies Abnormal Large Loads will be off-loaded through the port of Lowestoft. These loads will make their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford – Stage 4 Consultation Document, Section 2, figures 2.24 and 2.29 refer. Little mention has been made of these loads and no mitigation (except a means to cut across the roundabouts at the entrance to the Darsham Park & Ride and at Yoxford) has been proposed regarding these movements. We particularly draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to “pinch points” on the B1125 and the A12) and local air quality has already been raised but not addressed.

4.8 The baseline traffic figures given for Blythburgh location L remain at 1650 for the movement of traffic in both directions (Stage 4 Consultation Document, Table 4.2 page 88 refers). This baseline figure remains the same as at previous consultations despite Blythburgh Parish Council meeting with EDF traffic expert on 29/3/2019 to discuss and hand over traffic data for this location measured on a regular basis over a number of years with a calibrated VAS monitor. The data handed over showed conclusively that the 1650 figure presented in Table 4.2 is a serious underestimate. Figures measured with the same VAS monitor actually confirm EDF's baseline data for the A12 locations at Blythburgh. No explanation has been forthcoming for the discrepancy at Location L regarding the baseline data for which actual measurements exist. Comparison with data in table 4.2 for the Westleton Location F reinforces our conclusion that the baseline measurement at Location L is in error. Section 4.10.3 page 86 identifies Blythburgh Location L as one of the locations where "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". We have little confidence in this assertion when the baseline figure at Location L is a serious underestimate and figures provided in a face to face meeting to discuss and demonstrate this have seemingly been ignored. The subsequent statement at Section 4.10.6 that "EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation" would seem to be a tick box statement rather than a genuine wish to engage given our experience to date. It is to be hoped that this will change or that it will be mandated and monitored by the Inspector. Our suggestions for mitigation against the worst impacts of increases in traffic flows in already sensitive "pinch points" are detailed in the attached "Mitigation Table".

4.9 Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed in Stage 4 consultation. We wish to reiterate our concerns in this regard and the need for mitigation of both (i) rat running and (ii) fly parking. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.

4.10 No consideration has been given to safety of the junction of the A145 and A12 despite this being a known accident prone junction. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction. Blythburgh Parish Council would ask that consideration be given to mitigation of these enhanced risks and ensuing traffic congestion.

4.11 Sizewell Link Road (reference Stage 4 Consultation, Section 2.6.22 page 38). EDF are seeking views at Stage 4 as to whether this link road, if built, should be retained after construction is completed. Blythburgh Parish Council supports the retention of such infrastructure to allow fast moving traffic to access the site whilst

allowing the almost parallel road to serve more “local” traffic, tourists and cyclists. Both roads should be maintained.

4.12 As part of this consultation, EDF requested comments regarding the consultation process and we offer the following observations

- 4.12.1 Timing of this consultation over the main summer holiday period presented some challenges in coordinating responses.
- 4.12.2 The negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1, 2 and 3 Consultations (Appendix 3, 4 and 5 respectively), do not appear to have been addressed. The Stage 4 documents contain no references to mitigation action or expenditure of specific benefit to Blythburgh.
- 4.12.3 There is still insufficient information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will be mitigated at all let alone prior to the commencement of the project
- 4.12.4 It was disappointing that the Stage 4 documentation provided no answers to questions the Parish Council had raised at Stage 3 so these still remain unaddressed.
- 4.12.5 There is a lack of clarity as to how EDF will handle responses to Stage 3 and 4 and deal with the inter-relationship between these comments.
- 4.12.6 On the plus side, the staff at the Sizewell information centre in Leiston and those staffing the “Have your Say” sessions were very helpful in providing written material and answering questions that were within their remit.
- 4.12.7 Planning Aid England have, again, been extremely helpful with aiding our understanding of the process and structuring of responses.

Appendix 1: Outlines the Parish Council’s suggestions for additional mitigation against the worst impacts of increases in traffic flows.

Appendix 2: Provides a summary of parishioner comments from the Parish Council Meeting Open Forum held on 12 September 2019.

Appendices 3, 4 and 5 contain the Parish Council’s responses to Stages 1, 2 and 3 respectively.

Appendix 1

Blythburgh Parish Council's suggestions for additional mitigation against the worst impacts of increases in traffic flows

Important note: For the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that these MITIGATION requests apply to all eventualities regarding freight strategy for the construction of Sizewell C be it (i) rail led augmented by certain road infrastructure improvements, (ii) road-led strategy or (iii) an integrated strategy .

Section in Sizewell C Stage 4 Consultation Document	Section in Blythburgh Parish Council Response to Stage 4 Consultation Document	Issue Raised by Blythburgh Parish Council	MITIGATION Requested / Suggested by Blythburgh Parish Council
Section 2, figures 2.24 and 2.29 refer.	Response 3.7	Abnormal Large Loads making their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford. We draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to “pinch points” on the B1125 and the A12) and local air quality has already been raised but not addressed.	EDF to work with Highways to confirm Blythburgh Bridge loading requirements and impact of these large loads on road subsidence on A12 at entrance (30mph) to Blythburgh village from the north. Baseline air quality survey at junction of A12 with B1125 and regular on-going checks during construction. If problem identified the appropriate amelioration measures should be taken.
Section 4, Table 4.2 page 88 refers	Response 3.8	Baseline traffic figures given for Blythburgh location L are an underestimate.	We would like to understand why the figures we supplied 29/3/19 have seemingly been ignored.

Section 4.10.3 page 86		Section 4.10.3 page 86 identifies Blythburgh Location L as one of the locations where “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”.	Additional traffic on this road exacerbates an existing problem and mitigation is required: number plate recognition and other traffic calming measures to discourage use of this road are requested.
Section 4.10.6 states that “EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation”	Response 3.8	<p>Blythburgh Parish Council has identified 2 main “pinch points” within the village which impact the flow of traffic on the A12. These will be exacerbated by SZC traffic</p> <ul style="list-style-type: none"> - Narrow entrance to the B1125 from the A12 causing tail backs on the A12 for traffic from the north and also traffic joining the A12 from the B1125 – the bus stop on the South bound side of the A12 (towards Ipswich) within the village blocks the carriageway and creates traffic tailbacks on the A12 towards the junction with the B1125 	<p>Number plate recognition on the B1125 to discourage rat running and enforce utilisation of the Darsham park & ride.</p> <p>School children using the school bus must cross A12 and the provision of a pedestrian crossing or refuge is required.</p> <p>Create a pull-off for the bus so that traffic on the south bound A12 is not disrupted? Moving the bus stop may be required?</p>
Section 4.10.6 states that “EDF energy will continue to engage with parish councils	Response 3.9	Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed. We reiterate our concerns and the need for	<p>Speed cameras with number plate recognition located on the B1125 in Blythburgh</p> <p>B1387 from its junction with the B1125 to the A12</p>

with regards to potential additional mitigation in these areas following this Stage 4 consultation"		mitigation of both (i) rat running and (ii) fly parking. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.	should be improved as an alternative route for displaced traffic Village roads should be engineered to make them unattractive to through traffic
Section 4.10.6 states that "EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation"	Response 3.10	Safety of the junction of the A145 and A12. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction.	Consideration should be given to mitigating these enhanced risks and the ensuing traffic congestion. At the very least, a roundabout should be considered for this junction.

Appendix 2

Summary of parishioner comments from the Parish Council Meeting Open Forum held on 12 September 2019.

Blythburgh Parish Council hosted an Open Forum Meeting to give Parishioners an opportunity to raise their concerns, or otherwise, regarding the Stage 4 Consultation so their comments could be represented to EDF.
19 parishioners attended.

The meeting opened with a brief background and “next steps” to set the scene. Parishioners were invited to put forward their concerns, or otherwise, relating to the Stage 4 pre-application consultation document. Parishioners were also encouraged to submit their own individual response to the Consultation.

Key areas of comment are given below and, where appropriate, have been included in the main body of our response:

How does an individual respond to EDF?

A copy of the summary consultation document had been put through parishioners doors containing all EDF contact details. The closing date of 27th September 2019 was reiterated and Parishioners encouraged to submit their own responses.

Freight Management Strategy

Many Parishioners thought that it was wrong for EDF to have discounted a “by sea” option. They would like to see this reconsidered.

Given the expertise France has with trains and freight movement why does EDF not seem to favour a rail led strategy?

Rail-led strategy detailed at Stage 3 should be actively pursued.

Traffic within the Local Area of Blythburgh

Regardless of the final freight management strategy adopted the general mood of the meeting was that traffic would increase significantly and mitigation of the worst effects of this should be considered minimum. Specifically parishioners raise the following points:

- *B1125 needs to be improved as the traffic will increase.*
- *The level of noise increases with the speed of traffic and therefore a method to reduce speed is required.*
- *The increased volume of traffic will increase pollution levels. How will this be managed?*

- *Concerns that Sizewell C subcontractors and delivery vehicles using the B1125 (Angel Lane / Dunwich Road) would not be identified by the use of number plate recognition. How will the route to site for this traffic be controlled?*
- *Road Surface: Are the roads (B1125 and A12) able to sustain the increased level of traffic and proposed heavy loads? These roads are already deteriorating with current traffic levels.*
- *Fly Parking: Already of concern this is reported to be a greater issue than expected at Hinkley. Would number plate recognition help with this problem?*
- *Pedestrian paths: The amount of pedestrian footway along Angel Lane and Dunwich Road (the B1125 close to its junction with the A12) is dangerously low restricting the ability of pedestrians to move from one side of the village to the other safely. This will be exacerbated with the increased traffic along this road. Number plate recognition and speed controls would help but so would an additional footpath.*
- *Make B1125 Angel lane / Dunwich Road one way: The Chairman pointed out that this is beyond the scope of EDFs remit as it is an existing problem. Requests to EDF relate to mitigate for impacts created during construction phase.*

“How do we know EDF will react to issues raised?”

There was disappointment expressed that issues that had been raised in previous Consultation responses appeared to have gone unacknowledged. Does this mean that those comments / issues had been lost and would not be addressed? The Council reported that we have to rely on the inspectors carrying out their role diligently, which we have every reason to believe that they do.

Appendix 3

Parish Council's responses to Stage 1

SIZEWELL C

STAGE 1 CONSULTATION

Representations from Blythburgh with Bulcamp & Hinton Parish Council

SUMMARY

The main concerns of Blythburgh Parish Council with the Sizewell C proposal are the direct impacts on the village.

These representations concentrate on the specific traffic impacts on Blythburgh, notably safety and linkages within the village. The Parish Council has sought to offer suggested transport improvements to mitigate these impacts.

The unique demographics of the village, its heritage and character, and the importance of tourism, must also be considered by EDF Energy.

EDF Energy should ensure additional information is provided before moving to the Stage 2 'Preferred Options' consultation stage. Supplementary stages of consultation are requested, and Blythburgh Parish Council wishes to remain engaged with EDF Energy throughout this process.

These duly made representations will therefore be put forward as a matter of public record for a future independent Planning Inspector to determine whether EDF Energy has undertaken the correct process and procedure.

1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Blythburgh Parish Council.
- 1.2 They were formed in discussions with the Parish Council and local residents, which resulted in a specific meeting held on 31st January 2013.

2.0 CHARACTER AND LOCATION OF BLYTHBURGH

- 2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a small village in northeast Suffolk. The village has grown up straddling either side of the main road, currently the A12, since 1785. The population of the village is now at approximately 300 residents.
- 2.2 The village is set in a landscape of outstanding natural beauty with tidal river, marsh, heath, small woods, pasture and arable fields.
- 2.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village.
- 2.4 Blythburgh is also a very popular tourist destination. Visitors that are keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the years. The visitors include church lovers; artists; birdwatchers; music lovers; and others who come seeking relaxation in a rural environment.
- 2.5 Equally, the demographics of Blythburgh are important to understand, as the village has an ageing population. Although this is not uncommon in Suffolk or other parts of the country as a whole, what it means in relation to proposed development of Sizewell C is that the residents of Blythburgh are likely to see and live through the impacts of the construction period, but are unlikely to actually see any of the proposed benefits. Blythburgh Parish Council therefore request this is taken into account during future discussions with EDF Energy in relation to potential improvements for the area.
- 2.6 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh Parish Council is therefore keen to ensure that any development of Sizewell C takes this into account.

3.0 TRAFFIC AND TRANSPORT

- 3.1 Blythburgh Parish Council understands that the overall construction and commissioning period could last about ten years with significant construction activity over a seven-year period.
- 3.2 It is understood that any further development at Sizewell will require additional transport of materials and workforce.
- 3.3 The use of sea and rail for transporting freight are supported. However, Blythburgh Parish Council has concerns regarding additional road traffic impacts on the A12 and B1125 to the north of the site.
- 3.4 Overall, it is considered that there is a serious lack of transport information provided with this stage of the consultation process, notably an absence of traffic figures and detailed analysis.

4.0 ROAD

- 4.1 Traffic currently travelling from the 'north' towards the Sizewell site must pass through Blythburgh. Therefore, *any* additional traffic generated as a result of any development at Sizewell C will impact to some extent on Blythburgh.

A12 and B1125

- 4.2 The A12 and the B1125 pass through Blythburgh and there is a genuine concern that Sizewell C will increase the usage on both of these roads by: the workforce (both on and off duty); transportation vehicles; couriers; deliveries; and business associated with Sizewell (either directly or indirectly).
- 4.3 The A12 is acknowledged as a busy main road, and is a single carriageway at Blythburgh. It is expected the usage of this main route will intensify with the development of Sizewell C. The B1125 is already considered to be well established 'rat-run', and there is a fear that there will be further leakage of traffic onto this road that will eventually pass through Blythburgh.
- 4.4 Workers from the north using the A12 to travel to the 'park and ride' will all pass through Blythburgh. It is however accepted that the 'park and ride' should in theory minimise the use by the workforce of minor roads. It is also accepted that the permit scheme EDF Energy are proposing should further discourage the workforce from travelling to the Sizewell site independently. It would be useful to see the statistics of existing 'park and ride' schemes currently in operation to assess their effectiveness.

- 4.5 However, in reality the Northern ‘park and ride’ is unlikely to solve all of the associated workforce traffic issues. It is noted that current Sizewell workforce pass through Blythburgh on the B1125, therefore it is a fair assumption that this will only increase with Sizewell C.
- 4.6 There is also the fear that Blythburgh could become an unofficial ‘drop-off’ point for car-sharing schemes, which has happened in the past. The provision of a possible designated car park for the village has been identified as a suitable suggestion that would alleviate this problem and would also benefit the village at the same time.
- 4.7 Unless EDF Energy can categorically and legally guarantee that none of the Sizewell workforce (either existing or future workforce) will use the B1125 to pass through Blythburgh it must therefore be assumed that there will be some form of car traffic increase as a result of Sizewell C.
- 4.8 As EDF Energy has also mentioned, the off-duty workforce will also have access to private vehicles. Therefore, even if they are not travelling through Blythburgh for work purposes, there is every likelihood there will be some Sizewell related workforce passing through the village on a daily basis. This also represents an increase in traffic.
- 4.9 As well as the possible increase in workforce traffic, there is also concern about the increase in HGVs, lorries, and light vans passing through the village that would also be associated with Sizewell C. These will not be reduced by the ‘park and ride’ schemes being proposed.

Transport Statistics

- 4.10 Blythburgh Parish Council is concerned by the current transport statistics that are being used by EDF Energy in their Stage 1 consultation process.
- 4.11 EDF Energy are quoted as saying there should be a 5-15% increase in vehicular traffic on the A12, which they consider to be a “*modest addition to daily flows*”.
- 4.12 It does not appear there has been any analysis done on the impacts to the B1125.
- 4.13 Blythburgh Parish Council is in the process of preparing their own Traffic Strategy, which includes traffic counts and data analysis for traffic flows in and around the village.
- 4.14 This traffic strategy is an on-going process, but immediate assessment of the Parish Council’s data would appear to be at odds with the suggested traffic flows from EDF Energy.
- 4.15 The traffic strategy has identified specific ‘Sizewell peaks’ when the current Sizewell workforce pass through the village. The strategy has also identified junction black spots that must require further consideration.

- 4.16 Blythburgh Parish Council would therefore like the opportunity to discuss the transport models used by the developer and to share their traffic data with EDF Energy and Suffolk County Council at an appropriate point in the near future. The purpose would be to aid transport discussions for the local area.

Speeding and Safety

- 4.17 Speeding is a very real issue for the village of Blythburgh, with many vehicles passing through the village in excess of the national speed limits for this area.
- 4.18 As a result of the speeding, there are also very serious safety issues in the village. Like many rural villages in the area, Blythburgh does not have an extensive network of pavements. The result is that the speeding plus the lack of existing pavements means it is already difficult to cross from one side of Blythburgh roads to the other safely and confidently. These factors also discourage people from walking and attempting to cross the A12 in particular, which creates a separation of the village. This issue will only be intensified by any increase in traffic.

5.0 RAIL

- 5.1 It is understood and accepted that the railway must be fully utilised, and the best possible option for linking directly into the Sizewell site is supported.
- 5.2 However, there are concerns about where the anticipated trains will actually be coming from if the railway is extended into the site. There are known railway 'issues' in the surrounding area, including tunnels and line problems, which it is unclear if EDF Energy have accounted for or fully understood.
- 5.3 It is therefore suggested that EDF Energy must undertake further analysis of the rail routes being proposed, and also the wider rail network in order to understand the true extent of the impacts with providing rail links directly into the Sizewell site.

6.0 TRANSPORT IMPROVEMENTS

- 6.1 Blythburgh Parish Council has the following suggestions for transport improvements, which would need to be discussed as part of further on-going transport discussions.
- 6.2 Traffic management is seen to be the key to the resolution of most of Blythburgh Parish Council's concerns. It must be remembered that existing traffic, plus holiday and tourism traffic, must be carefully managed with any further Sizewell traffic.

Speeding

- 6.3 Possible solutions to tackle the problem of speeding through the village are required. Specific traffic calming measures should be explored for the B1125, with the specific aim of essentially making this stretch of road more unattractive for speeding and rat-running.
- 6.4 Options for potential traffic calming could include: physically reducing the speed limit through the village; improved road markings; road narrowing (to possibly incorporating additional pavement space); warning lights at the entrances to the village; or additional signage.

Safety

- 6.5 Any opportunities for improving safety in the village would be very much welcomed by the Parish Council and residents of Blythburgh.
- 6.6 This could include introducing additional pavements, or increasing existing pavements.
- 6.7 Some form of pedestrian crossing should also be considered at a suitable point(s) on the A12 within the village. This could be on a similar principle to that already used in Farnham.
- 6.8 Introducing 'crossing islands' into the middle of the road at either end of the village, would provide people an element of safety and security while crossing the road. This would assist both the elderly and the young in crossing the road, and would also increase the linkage between both sides of the village.

Alternative Options

- 6.9 Complementary to these proposals is the improvement of the B1387 from the Water Tower crossroads to the Toby's Walks junction with the A12. This would provide a 'Blythburgh southern bypass' for traffic displaced by measures taken to minimise the use of the B1125 through the village.

Overall

- 6.10 It is acknowledged that any transport improvements would need to be discussed and agreed with Suffolk County Council.
- 6.11 Blythburgh Parish Council would therefore request that further discussions take place between EDF Energy, Suffolk County Council, and the Parish Council to discuss these issues as part of the on-going dialogue between developer and stakeholders.

7.0 NOISE, VIBRATION AND LIGHT POLLUTION

- 7.1 There are concerns regarding potential noise, vibration, and light pollution associated with the proposed Sizewell C development. Some of these will have a direct impact on Blythburgh, such as a result of any increased traffic, while others will have a much wider impact on the surrounding area.
- 7.2 It is understood that various measures will be undertaken to mitigate these issues, such as bunding and planting at, for example, park and ride sites. However, the lack of information and detail at this stage makes it difficult to assess these impacts.
- 7.3 Appropriate noise, air quality, vibration, and light assessments must be prepared by EDF Energy in order to provide a full understanding of the impacts proposed on Blythburgh and other affected villages.

8.0 EDF ENERGY OPTIONS

- 8.1 Blythburgh Parish Council remains largely indifferent to the options for developments away from the village, such as new road and rail links and the location of an on-site campus. The council nevertheless recognises the indirect benefit of housing a high proportion of the workforce on-site. Their main concerns are however related to the direct impacts to their village, notably through the increase in traffic.
- 8.2 Of the ‘park and ride’ options being proposed through the consultation, Blythburgh Parish Council are most interested in the Northern options.
- 8.3 Blythburgh Parish Council’s preference is for Option 2 at Darsham off the Northern ‘park and ride’ options presented. The benefit of the site being located adjacent to the existing railway station is seen to offer the best and most suitable option, with the potential for the longer-term improvement of parking arrangements at Darsham station.

9.0 IMPACTS ON TOURISM AND LOCAL SERVICES

- 9.1 Blythburgh Parish Council is also very concerned about the impacts on local services, especially the tourist industry in the area.
- 9.2 Blythburgh is a very historic place, and benefits greatly from tourism in the area at various points throughout the year. This includes walkers, and those who stop off to use the village public house and shop.
- 9.3 It is hoped that any development at Sizewell C will actually benefit the village, by the increase use of its public house, shop and facilities. However, an increase in traffic, and wider impacts of the Sizewell C development could

actually be detrimental to the tourist industry in the region. This would have a knock-on effect on villages such as Blythburgh.

- 9.4 Any increase in population into this part of Suffolk as a result of Sizewell C will also have an impact on the services in the surrounding area. This includes: police; health; schools and education; and other emergency services. It is expected EDF Energy will consider any responses from these organisations very carefully, as they are best placed to advise on impacts to their services. The Parish Council is also concerned about a possible reduction in availability of tradesmen to the local population, and cost inflation.

10.0 CONCLUSIONS

- 10.1 Blythburgh Parish Council is concerned about the impacts on their village as a result of any development of Sizewell C.
- 10.2 Transport impacts are of serious concern, and must be properly addressed. This must include assessment of speeding and safety issues.
- 10.3 Any future development at Sizewell will have an impact on the surrounding area, local communities, visual appearance, and amenity facilities. These will collectively have an impact on tourism in this area of Suffolk, which will have a knock-on effect on Blythburgh.
- 10.4 The important heritage of Blythburgh, plus its general aging population must also be taken into account.
- 10.5 Blythburgh Parish Council has taken the opportunity to offer some suggestion to mitigate these issues. Together with their additional transport analysis, Blythburgh Parish Council hopes these issues can be discussed with EDF Energy and Suffolk County Council as part of an on-going dialogue with the affected villages during this consultation process.
- 10.6 Further detailed information and additional stages of consultation are requested before EDF Energy should progress to the Stage 2 consultation.
- 10.7 It is expected that feedback and experiences from Hinckley Point will be learned from, and should assist EDF Energy through future consultation stages.

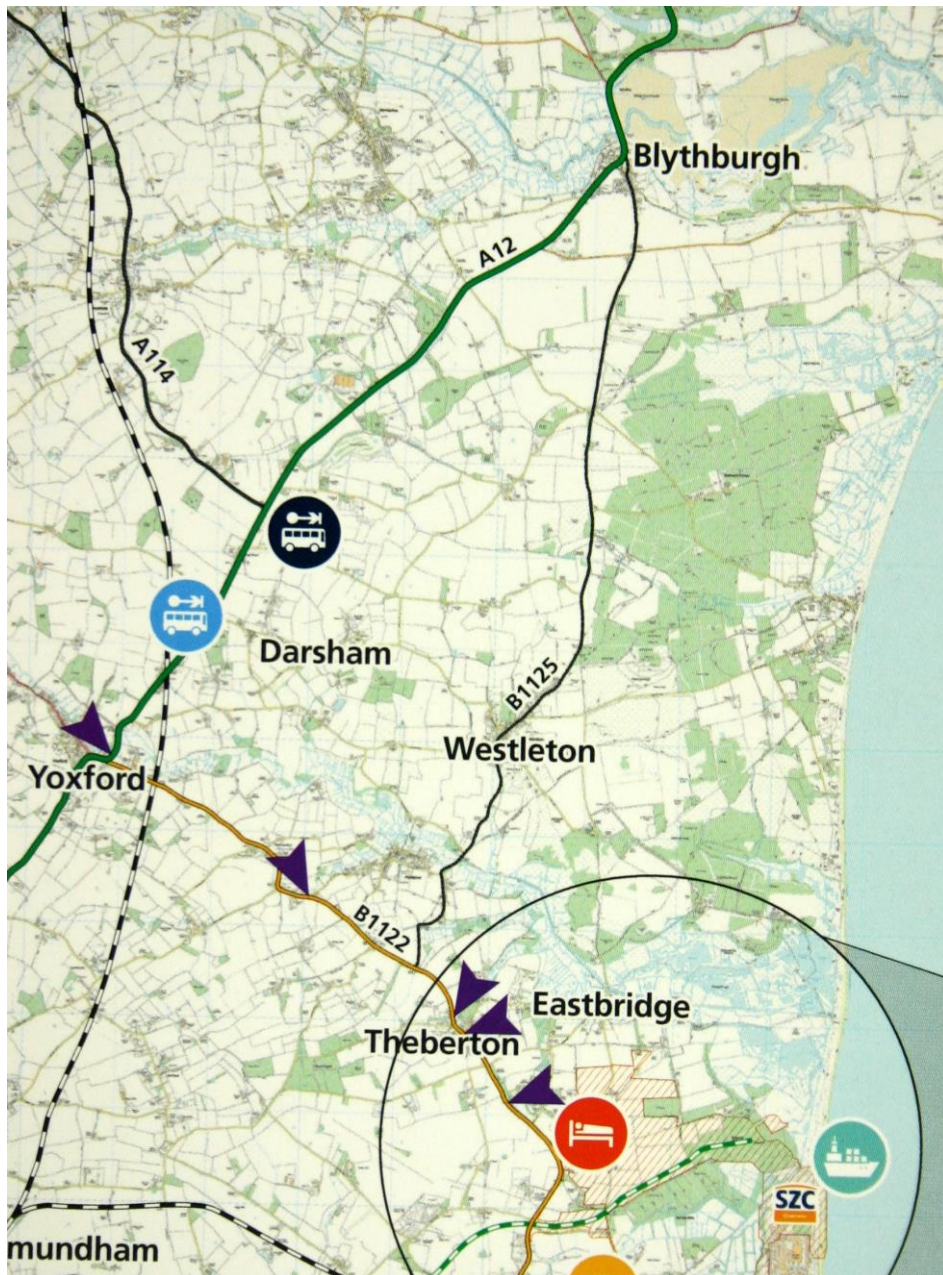
Appendix 4

Parish Council's responses to Stage 2

SIZEWELL C Proposed Nuclear Development

Stage 2 Pre-Application Consultation

Response from the Parish Council for Blythburgh with Bulcamp and Hinton



January 2017

A. SUMMARY

Blythburgh Parish Council is concerned that the Sizewell C project will have negative impacts on the village.

The demographics of the village, its heritage and character, its location within an Area of Outstanding Natural Beauty, and the importance of tourism, have yet to be considered adequately by EDFE.

These representations describe the specific traffic impacts on Blythburgh, notably safety and linkages within the village. The Parish Council makes proposals to mitigate these impacts.

Blythburgh parish council supports the maximization of the use of sea and rail transport but is not convinced that the current proposals demonstrate that this objective will be achieved.

Blythburgh parish council does not believe that the proposed use of the B1122 for access to the construction site is feasible. The building of a new link road is supported.

The proposals for a workers' campus on site fail to recognize the negative impacts on local communities and fail to provide legacy housing.

Insufficient time has been allowed for consultation. The consultation process is not transparent, the information provided is inadequate, and the difficulty of preparing constructive responses is thereby increased.

B. MITIGATION PROPOSALS

See Appendix A.

C. DISCUSSION

1. SIZEWELL C PROPOSALS: OVERALL

1.1 INTRODUCTION

- 1.1.1 These representations are made on behalf of Blythburgh parish council. They are presented as responses to the questions in the Stage 2 Pre-Application Consultation questionnaire.

- 1.1.2 They were agreed after discussion at a parish council meeting held on 24 January 2017.
- 1.1.3 The council is concerned that the negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1 Consultation (Appendix B – *given as Appendix 3 in Stage 4 Consultation Response*), do not appear to have been addressed. The Stage 2 documents contain no references to mitigation action or expenditure of benefit to Blythburgh.
- 1.1.4 There is no information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will indeed be mitigated.

1.2 CHARACTER AND LOCATION OF BLYTHBURGH

- 1.2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a small village in northeast Suffolk, nine miles north of the Sizewell C site. The village has grown up straddling a trunk road, now the A12, created in 1785. The village has approximately 300 residents.
- 1.2.2 Blythburgh is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with tidal river, marsh, heath, small woods, pasture and arable fields.
- 1.2.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village.
- 1.2.4 Blythburgh is a very popular tourist destination. Visitors keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the year. The visitors include church lovers; artists; birdwatchers; music lovers; and others who come seeking relaxation in a rural environment.
- 1.2.5 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.
- 1.2.6 Blythburgh is divided physically and mentally by the A12 trunk road and the B1125. Existing problems will be exacerbated by the Sizewell development: traffic density and speed; dangerous bottlenecks and junctions; the lack of safe crossing points for pedestrians; discontinuous footpaths; and the impact of rat-running vehicles on the B1125.

- 1.2.7 Equally, the demographics of Blythburgh are important to understand. The village has an ageing population. Although this is not uncommon in Suffolk or other parts of the country, its significance in relation to the proposed development of Sizewell C is that many residents of Blythburgh will live through the negative impacts of the construction period, but are unlikely to enjoy any of the potential benefits. Blythburgh parish council therefore urges that this is taken into account in relation to mitigation and compensatory action and expenditure.
- 1.2.8 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh Parish Council is therefore keen to ensure that any development of Sizewell C takes this into account.

2. MAIN DEVELOPMENT SITE: ENVIRONMENT

Blythburgh parish council recognizes that the Sizewell project will inevitably have an environmental impact and cause disruption. The council is concerned that the use of green-field sites has not been minimized. Every effort must be made to return any area, used during construction and not required for operation, to its original condition, with the enhancement of environmental quality where this is possible.

3. MAIN DEVELOPMENT SITE: NEW ACCESS ROAD

Blythburgh parish council would support a solution that minimized the use of land and, by bridging rather than physically separating parts of SSSI, avoids the fragmentation of natural habitats. The views of specialist agencies such as Natural England must be taken into account.

4. MAIN DEVELOPMENT SITE: MANAGING CONSTRUCTION MATERIALS

Blythburgh parish council would, in principle, support a “near location” for borrow pits during construction to keep HGV traffic off the proposed B1122 access route, although the council is concerned about the scale of the proposals. However, the creation of a new access route (See 12.7) to facilitate the movement of material to the south, would obviate the need for borrow pits. Transport by sea would be even more acceptable. On environmental damage, we would lend our support to the views of Natural England (as experts in this field) regarding the preferred option.

Once the plant is operating we would urge that the impact of the creation of borrow pits during the construction phase be mitigated and the land restored as soon as possible to its former state (or better).

5. ACCOMMODATION: OVERALL STRATEGY

- 5.1 Blythburgh parish council supports the principle of housing workers at a campus to reduce traffic flows on the local road networks during the peaks associated with shift changes and day worker patterns. Its location (or the location of multiple campuses) should take account of the ready availability of recreational opportunities outside work.

The accommodation facility would provide job opportunities for local communities during the construction phase and the possibility to move to jobs on site during the operational phase.

- 5.2 The council has concerns about utilising a green field site for the campus and the concomitant impact on local residents and tourism.

The campus should be built at a location or locations, and to a standard to provide legacy housing for local communities or, for example, student accommodation.

Any sports facility or facilities should be located to leave a legacy facility and the sharing between campus employees and local residents should be considered.

- 5.3 The parish council has concerns regarding the recreational and homeward journeys of workers housed in the proposed campus. Such movements are not controlled and have the potential to swamp local communities and increase traffic flows on the B1125. (See also 7 on control of traffic).

- 5.4 The exacerbation of traffic problems in Blythburgh should be mitigated by deterring through (rat-running) vehicles from using the B1125 (Dunwich Road and Angel Lane) in the village. Speed cameras should be located on the B1125 at the southern entrance to Blythburgh. The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby's Walks) should be improved as an alternative route for displaced traffic. The village roads should be engineered to make them unattractive for through traffic. (See also section 10).

- 5.5 The creation of local job opportunities at the campus, and the provision of legacy housing would represent mitigation.

6. ACCOMMODATION: CAMPUS LAYOUT

Blythburgh parish council considers that the location of the proposed campus and the failure to provide legacy accommodation do not satisfy the criteria set out in section 5 above.

7. TRANSPORT: OVERALL STRATEGY

Blythburgh parish council supports action to reduce the volume of freight carried by road; every effort should be made to maximize the use of sea and rail. The council believes that while the proposals for campus accommodation (see sections 5-6) and the park and ride facilities (section 10) will have positive advantages for EDFE, and will reduce the number of vehicles on the roads between the A12 and the Sizewell site, there will be negative consequences for existing businesses, tourism and local communities. There is insufficient evidence in the Stage 2 documentation of action to mitigate negative impacts. See Section 10. Blythburgh parish council is concerned that only HGVs will be controlled; LGVs and private cars will be controlled only indirectly through parking permission at the site and the provision of Park and Rides. Blythburgh parish council urges that all site traffic should use only designated routes and control measures to guarantee this should be established.

8. TRANSPORT: RAIL

- 8.1 Blythburgh parish council notes the plan to include up to five freight trains a day (10 movements) either running onto the Sizewell C site via the Green route of a new rail connection or to a freight yard close by the current Leiston freight terminal for transfer by road onto the site.

The parish council welcomes the claimed removal by each train of the equivalent to 50 HGV loads, thereby removing 250 HGV trips per day or 500 movements. Even so this still leaves a large number (450 to 500) of HGV movements on the roads each day.

- 8.2 Blythburgh parish council supports the improvement of the Saxmundham - Leiston branch line with automatic level crossings and necessary upgrades to the track. The Woodbridge to Saxmundham section of the East Suffolk line, currently single track, should be improved by reinstating the double track over the entire section. This would be an important legacy development, permitting increased freight and passenger traffic during the construction and operational phases of Sizewell C. (See also 10.4).
- 8.3 In addition to the freight trains, the use of one of the various types of 'Rolling Highway' systems should be considered, comprising of a series of

very low flat wagons. Lorries drive up a ramp and then along the length of the train to the furthest empty wagon. At the destination the locomotive is removed, a ramp swung into place and the trucks driven off.

If such a train could take 25 HGVs, running five trains a day of this type would remove 250 HGV movements from the roads. Such a scheme would require a depot in the Ipswich area.

These systems are in use in France, Italy, Austria and Switzerland among other countries .

9. TRANSPORT: SEA

Blythburgh parish council supports the maximization of the use of sea transport. The council is not qualified to comment on the merits of the jetty proposals but is concerned that full account has not been taken of the fragility of the coastline and its probable retreat, the probability of more frequent tidal surges, and the expected rise in sea level.

10. TRANSPORT: PARK AND RIDE

- 10.1. Blythburgh parish council acknowledges that the creation of Park and Ride facilities will decrease the number of vehicles travelling to the construction site, the area needed for vehicle parking there, and facilitate the use of designated routes.
- 10.2. However, no Park and Ride on the A12 south of Blythburgh will be of any advantage to the village. The full flow of traffic from the north to Darsham Park and Ride will pass through the village, adding to the HGV, bus, LGV and other private car traffic generated by the project. It should be noted that Blythburgh church and the village hall are on one side of the A12, and the White Hart and the village shop on the other. Schoolchildren must cross the A12 to catch school buses. (See 10.10). The provision of a pedestrian controlled crossing is required in mitigation.
- 10.3. The project documentation includes a tacit acceptance that Sizewell C traffic will use the B1125 route through the village. Existing problems with traffic flows through Blythburgh on the A12 and B1125 will be exacerbated and the recognized dangers at A12 junctions in the parish between the A145 (to Beccles) and Hazel Lane (to Wenhaston) will increase.

- 10.4 The proposed Park and Ride at Darsham is 4½ miles south-west of Blythburgh. It offers the prospect of a legacy facility of value to users of Darsham station. However, the likely interruption to A12 traffic caused by the design and operation of the Park and Ride will have a ripple effect to the disadvantage of Blythburgh. Vehicles entering and leaving the Park and Ride must cross streams of through traffic. It seems essential that the entrance must be controlled by traffic lights. A result will be that even short interruptions to a heavy traffic flow will cause significant tailbacks.
- 10.5 The experience of the Latitude Festival at Henham Park is relevant. Traffic flow data show that vehicle numbers were less important than the speed with which the vehicles left the A12 for the festival site. A failure to get traffic off the A12 onto the festival site quickly caused many miles of tailbacks until 2016 when a traffic management plan dealt successfully with that and other issues.
- 10.6 A12 delays will have a cost for regular users. Access to Darsham station will be affected with consequences for rail travellers. Regular southbound travellers from north of Blythburgh will be tempted to avoid delays by seeking alternative routes along minor roads, including the B1125 through Blythburgh village.
- 10.7 The speed of traffic is as important as the numbers of vehicles. Blythburgh parish council believes that, for example, the village will be exposed to danger from late-evening north-bound traffic at shift change. There is a history of vehicles leaving the road at the White Hart bend, resulting in fatalities, at such times when the traffic flow is light. Protection of the properties on the east side of the A12, from the White Hart to the Blyth river bridge, is required in mitigation. (See 10.10 and www.eadt.co.uk 'Blythburgh, crash' reports).
- 10.8 Tailbacks of northbound traffic on the A12, south of the Park and Ride, will have the potential to delay traffic in Yoxford, blocking the B1122 junction, affecting the viability of that route for access to the Sizewell site.
- 10.9 It must also be noted that the Darsham level crossing on the A12 will close up to twice every hour between 0700 and 2300 hours. Park and Ride traffic in both directions will be affected.
- 10.10 Given that the Park and Ride facility offers no benefits to Blythburgh, and will add to problems already exacerbated by the Sizewell project traffic flow through the village, Blythburgh parish council urges that the following mitigation action is taken:
1. A safe light-controlled crossing on the A12 within the village is provided for pedestrians, with school children of particular concern. It is noted that a pedestrian crossing is proposed for Theberton.

2. Permanent speed cameras are installed on the A12 north and south of the village. Blythburgh must become known as a place where speeding will always be penalized.
3. Barriers are installed on the east side of the A12 between the White Hart and the river bridge, to protect properties from speeding vehicles that leave the road.
4. Through (rat-running) traffic should be deterred from using the B1125 (Dunwich Road and Angel Lane) in the village. Speed cameras should be located on the B1125 at the southern entrance to the village. The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby's Walks) should be improved as an alternative route for displaced traffic. The village roads should be engineered to make them unattractive for through traffic.

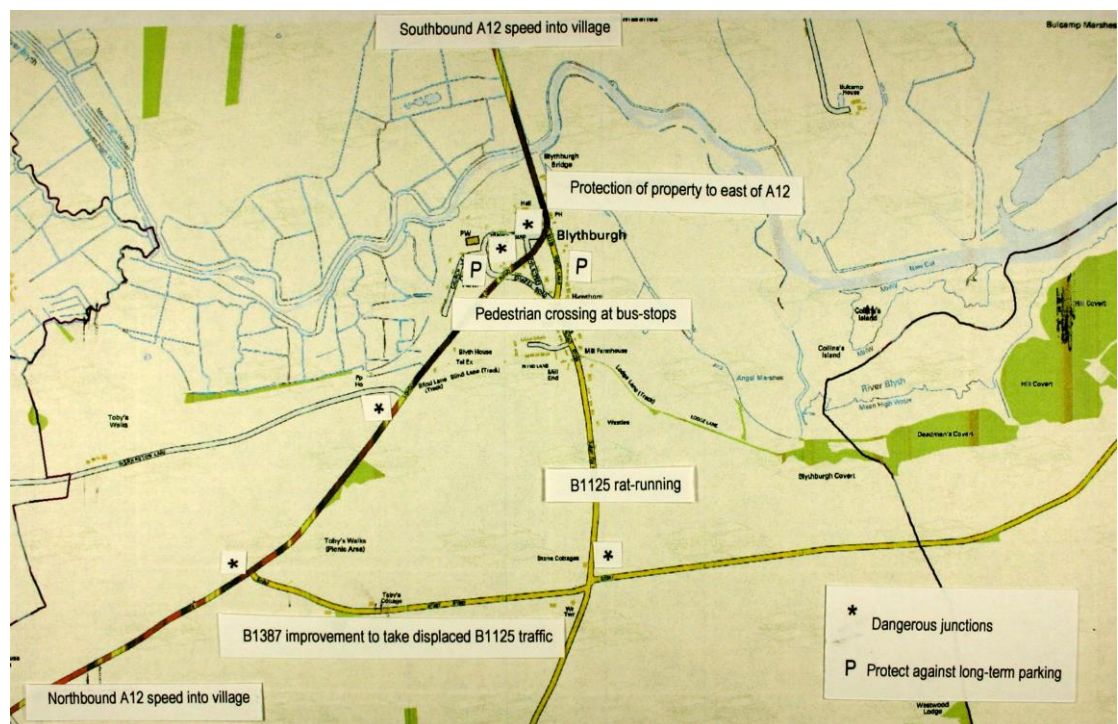


Figure. Blythburgh traffic issues and proposed mitigation

11. TRANSPORT: ROAD IMPROVEMENTS – A12

- 11.1. Blythburgh parish council supports the principle of improving the A12, not only to facilitate the movement of vehicles to the Sizewell site, but also to minimize the disruption of existing A12 traffic.

- 11.2 The council supports the proposal for a two-village bypass around Farnham and Stratford St Andrew, as beneficial to existing users of the A12 and the villages concerned.
- 11.3 Blythburgh parish council is not convinced of the merits of a four-village bypass, in the context of the Sizewell project. It would deliver traffic more quickly to the potential bottleneck at Yoxford (see Section 12) and the large investment involved could be better spent in mitigation action elsewhere.

12. TRANSPORT ROAD IMPROVEMENTS – YOXFORD/B1122

- 12.1. Blythburgh parish council is not convinced that the proposal to use the B1122 as the route to the Sizewell site, even with improvements, is feasible.
- 12.2. The road would carry the combined flow of traffic from north and south, a combination of HGVs, buses, LGVs and cars. The probability of an accident, with the heavy two-way flow, would be high.
- 12.3. No alternative routes have been identified. Blythburgh parish council fears that in the event of an incident, traffic from the north will be routed on the B1125 through the village. Blythburgh parish council is concerned that possible alternative routes, such as the B1125, could not without improvement safely carry heavy Sizewell traffic.
- 12.4. The B1122 proposal will load the villages of Yoxford and Theberton with the full flow of traffic with its concomitant noise, pollution and accident potential.
- 12.5. A roundabout or light-controlled junction at Yoxford will interrupt A12 traffic, just as the Darsham Park and Ride will. Tailbacks through Yoxford to the south will greatly increase the difficulty of access to the A12 from the A1120, a key tourist route. A possible negative interaction between the Park and Ride and the junction at Yoxford has already been identified (Section 10). It is difficult to see how the A1120 junction could be improved without unacceptable consequences for the fabric of Yoxford.
- 12.6. The B1122 proposal, by imposing a heavy load on a key access route, and with the probability of incidents that block the road, will increase the difficulty of responding to any emergency at Sizewell.
- 12.7. Blythburgh parish council supports the building of a new access road from the A12 to Sizewell, south of Yoxford (for example the D2 route considered in the development of Sizewell B). This would relieve Yoxford of much of the proposed traffic load, and avoid the creation of a bottleneck. A12 traffic would flow more freely. The risk of interruption

to the flow of men and materials to the Sizewell site would be reduced. A valuable legacy would be created, of continued value during Sizewell C operation. Responses to an emergency at Sizewell would be facilitated.

- 12.8. Blythburgh parish council is aware that responses to some of its concerns about highway matters will be the responsibility of EDFE and for others the Highways Authority. The parish council urges close cooperation between the relevant agencies to ensure that the optimum solution, reflecting the communities' interests as well as those of EDFE, is adopted.

13. PEOPLE AND ECONOMY

- 13.1. Blythburgh parish council welcomes the prospect of attracting more people to live in the village during the construction and operational phases, especially young families who would balance the community's age profile, and engage in local activities,
- 13.2. The council is concerned that the tourist trade will be damaged, through the loss of accommodation, disturbance at attractive locations, and deterring visitors by congestion and delays on the A12 and tourist routes. In Blythburgh the White Hart, the village shop and local B&Bs depend upon tourists. The church attracts thousands of visitors every year and they make a significant contribution to the cost of maintaining the fabric.
- 13.3. Mitigation through grant aid to enhance tourist facilities and their promotion is proposed.
- 13.4. Blythburgh village hall hosts many organisations and functions, from the village and beyond. The church houses prestigious events such as the Aldeburgh Festival. Noise, disturbance and unauthorized parking in the village must not be allowed to reduce the attraction of Blythburgh for such activities.
- 13.5. Blythburgh parish council is concerned about the prospect of the village being used for day-long parking by car-sharing pools. The council expects that sharing with a driver authorized to park at Sizewell will be attractive. The church car park is especially vulnerable, and Chapel Road and Angel Lane are locations where long-term parking already happens. Mitigation is urged through the imposition of parking restrictions on village roads (minimizing the effect on residents) and financial support for the church authorities if experience shows that a barrier is needed at their car park.
- 13.6. Blythburgh parish council welcomes any increased educational and job opportunities arising from the Sizewell project, and the benefits that arise

from the supply of goods and services. SZC should partner with local schools and colleges to highlight opportunities.

- 13.7. The council is concerned that the Sizewell project's terms of employment will attract local tradesmen so that residents will find it difficult to obtain plumbers, electricians and other services. Mitigation should include the provision of training opportunities for local young people to fill skills gaps and deal with the consequences of skills' migration.
- 13.8. The possibility of employment at Sizewell for young people and others who may not have their own transport would be enhanced if buses from Lowestoft and Ipswich picked up passengers at points along the route to Sizewell. The establishment of mini-bus shuttle services to the Park and Ride facilities, from such places as Halesworth through local villages, should also be considered. Consideration should be given to the provision of mopeds for local workers where other means of travel to the site or Park and Rides are not viable.
- 13.9. Sizewell needs to be self-sufficient for its workers' health care, to avoid placing an additional load on stretched local resources. Sizewell's recruitment policy should avoid damaging local facilities by poaching staff. Mitigation by providing financial support to local health services should be considered.

14. CONSULTATION PROCESS

- 14.1. Blythburgh parish council is concerned that its response to Stage 1 Consultation does not appear to have had any effect on proposals concerning Blythburgh.
- 14.2. Blythburgh parish council is concerned at the lack of transparency in the consultation process. The responses to Stage 1 Consultation are not publically available (unless respondents themselves have chosen to share them). The Stage 2 proposals cannot be related to Stage 1 responses. The existence of confidentiality agreements between EDFE and some organisations further inhibits public debate.
- 14.3. Blythburgh parish council considers that the timing of the Stage 2 Pre-Application Consultation over the Christmas and New Year period was unnecessary and unfortunate and created difficulties for organisations preparing a response.
- 14.4. The local exhibitions were a valuable opportunity to gain information and ask questions.
- 14.5. The provision of help from consultants from Planning Aid England was valuable to some extent; about the process of consultation if not the

content of responses. However, the consultants admitted that they had been engaged at a very late stage and they clearly lacked local knowledge. Therefore the support was not as valuable as it could have been.

APPENDIX A

MITIGATION PROPOSALS

SECTION IN BLYTHBURGH PARISH COUNCIL RESPONSE TO CONSULTATION	ISSUE RAISED BY BLYTHBURGH PARISH COUNCIL	MITIGATION REQUESTED BY BLYTHBURGH PARISH COUNCIL
Summary	Proposals to use B1122 for access to construction site not feasible	Building of a new link road is supported by Bythburgh Parish Council
4. Main Construction Site. Managing Construction Materials	Borrow Pits used during construction phase	Return to former state or better at end of construction phase / start of full operation
5. Accommodation. Overall Strategy	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Speed camera located at southern end of B1125 at the southern entrance to Blythburgh
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	B1387 from its junction with the B1125 to the A12 should be improved as an alternative route for displaced traffic
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Village roads should be engineered to make them unattractive to through traffic
		Creation of local job opportunities at the Campus would provide some mitigation for disruption.
		Provision of legacy housing

7. Transport. Overall Strategy	Insufficient evidence of action to mitigate the negative impacts of the park & ride at Darsham	Better Access and Egress to the Darsham park & ride. Includes traffic light controls and legacy parking for the period of full operation and for Darsham train station users.
	Only HGV Vehicles will be controlled. Light goods vehicles will only be controlled indirectly by parking permissions	All site traffic should use only designated routes and control measures to guarantee this should be established for both construction and the period of full operation
		Maintain number recognition systems for the period of full operation of Sizewell C, NOT just during construction phase.
8. Transport Rail	Removing 250 HGVs per day from road network is supported but more is needed.	The Woodbridge to Saxmundham line should be dual tracked to remove further HGVs from local road network and provide legacy rail link to operational site
		In addition to freight trains one of the rolling highway train systems should be considered
10. Transport. Park & Ride	Park & Ride Darsham will have NO impact on the additional traffic flow through Blythburgh	School children using the school bus must cross A12 and the provision of a pedestrian crossing is required.
	The Park & Ride will create interruptions to traffic flows on A12 and create ripple effect which will impact Blythburgh Village. Experience of Latitude Festival at Henham Park is relevant. Traffic flow data showed that vehicle numbers were less important than the speed with which traffic left the A12 to the Festival site. A failure to get traffic off the A12 onto the Festival site quickly caused many miles of tailback	<ol style="list-style-type: none"> 1. Safe, light controlled pedestrian crossing on the A12 within the village. 2. Permanent speed cameras installed on the A12 north and south of the village. 3. Barriers installed on East side of A12 between White Hart and River Bridge. 4. Through traffic deterred from using B1125 by speed cameras located at the southern edge of the village. 5. B1387 should be improved as an alternate route.

11. Road Improvements. A12	Blythburgh Parish Council does not support the 4 villages by-pass	Monies could be better spent on other mitigation measures.
12. Transport. Road Improvements Yoxford B1122	No route specified for when B1122 blocked for an Emergency situation - road blocked by crash	Need to have an alternate route specified which is not the B1125 through Blythburgh which is not capable of carrying the heavy traffic.
	No route specified, if B1122 blocked, for an Emergency on the nuclear site.	Build new access road from A12 to Sizewell site e.g. D2 route raised as part of the Sizewell B consideration
13. People and Economy	Parish Council concerned that tourist trade damaged through loss of accommodation or traffic impact on tourist routes.	Grant Aid to enhance and promote tourist facilities
	Parish Council concerned the use of village parking facilities for day long parking for car share pools to the Sizewell site during both construction and operation will impact many organisations and functions e.g. Aldeburgh Festival.	Parking restrictions on village roads and, if necessary, mitigation against use of free car parking areas.
	Tradesmen unavailable to local community through Sizewell C Terms of employment	Training opportunities for local young people to fill skills gap and loss of tradesmen.
	Positively support the employment of people from the local areas	1. Buses to pick up along the route to Sizewell. 2. Mini-bus shuttle service to park & ride. 3. Consideration of provision of mopeds under special circumstances
	Sizewell should be self-sufficient for its health care	Recruitment policy to avoid damaging local facilities by "poaching" without concomitant support for the local services.

14. Consultation Process	Timing of the Stage 2 pre-application consultation over the Christmas and New Year period was unnecessary	This should be taken in to account in considering if the Consultation process was robust.

APPENDIX B - *given as Appendix 3 in Stage 4 Consultation response*

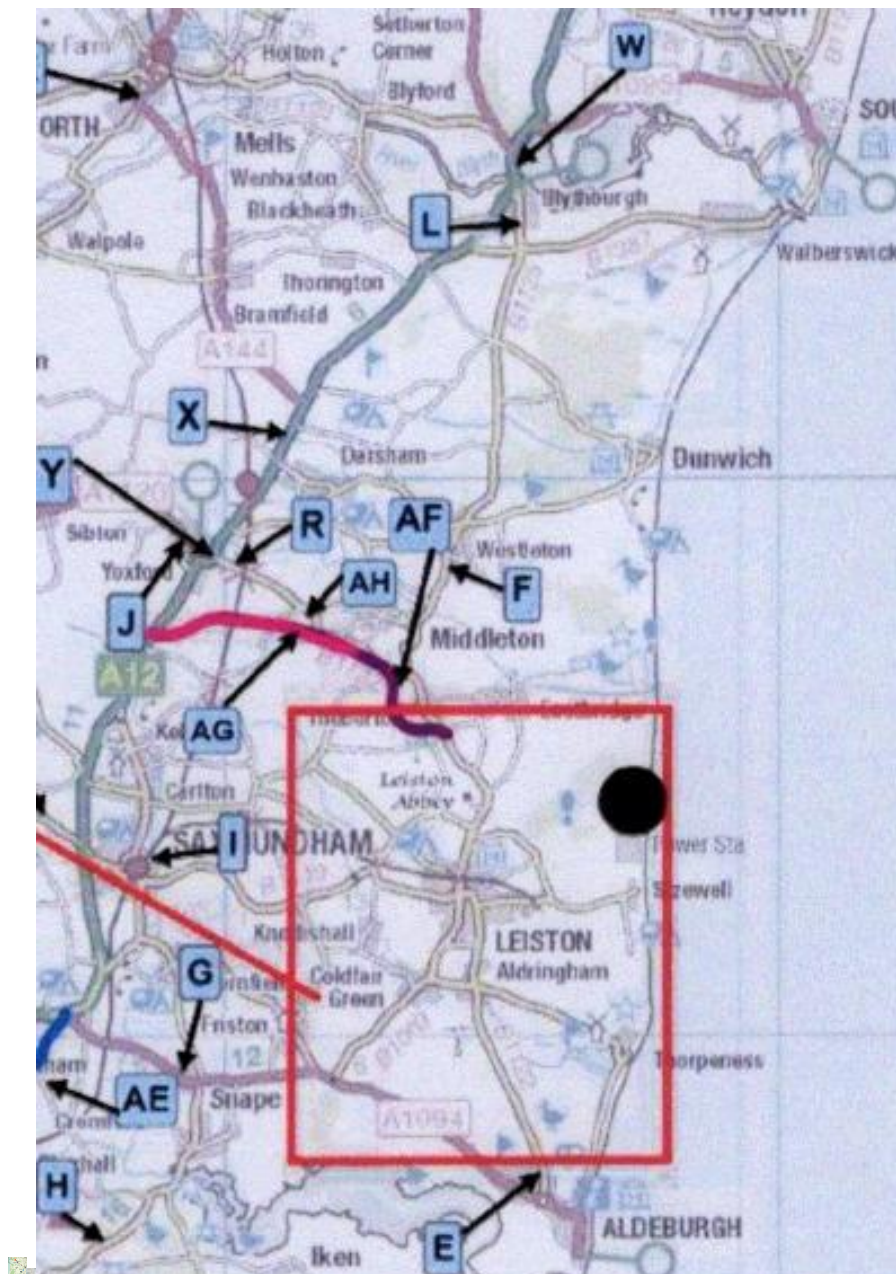
Appendix 5

Parish Council's responses to Stage 3

SIZEWELL C Proposed Nuclear Development

Stage 3 Pre-Application Consultation

Response from the Parish Council for Blythburgh with Bulcamp and Hinton



MARCH 2019

1. SUMMARY

- 1.1 Blythburgh parish council is concerned that the Sizewell C project will have negative impacts on the village, and that there are no specific mitigation proposals.
- 1.2 The Stage 3 consultation document shows that some attention has been paid to matters raised by communities in the Stage 2 process, but there has been no response to concerns raised about the direct impacts on Blythburgh. There is no evidence of the criteria used to measure the negative impacts on communities' amenity.
- 1.3 The demographics of Blythburgh, its heritage and character, its location within an Area of Outstanding Natural Beauty, and the importance of tourism, have yet to be considered adequately by EDFE.
- 1.4 Traffic through Blythburgh village, divided by the A12 and B1125, will increase but Blythburgh parish council cannot reconcile its own traffic figures with those presented by EDFE.
- 1.5 These representations describe the specific impacts on Blythburgh, notably safety and linkages within the village. The parish council makes proposals to mitigate these impacts.
- 1.6 Blythburgh parish council supports the maximization of the use of sea and rail transport but the current proposals demonstrate that this objective will not be achieved.
- 1.7 The council is concerned about coastal erosion to the north of the site and possible impacts on the Blyth estuary.
- 1.8 Blythburgh parish council does not believe that the use of the B1122 for access to the construction site is feasible. The building of a new link road south of Yoxford is supported, with a connection to it for traffic from the north. The link roads should also be part of the rail-led strategy if adopted.
- 1.9 Certain improvements to the rail system as part of the rail-led strategy should be adopted as part of the road-led strategy.
- 1.10 The proposals for a workers' campus still fail to recognize the negative impacts on local communities, fail to provide legacy housing, and will have considerable negative environmental impacts.
- 1.11 The council urges that mitigation improvements to the road and rail infrastructure should be completed before the SZC project generates significant increases in traffic. Such timing for the improvements should be a condition for the approval of the project. The council is concerned that 'many of these [mitigation] measures would not be in place during

the early years of the construction phase [Stage 3 doc. ref. 6.6.29].’ See Appendix B for Blythburgh parish council’s mitigation proposals.

- 1.12 The consultation process is not transparent, the information provided is inadequate, and the difficulty of preparing constructive responses is thereby increased. However, the proposal to consult with individual communities is welcomed [Stage 3 doc. refs 5.2.25 and 6.12.2]. Blythburgh parish council proposes the following topics for direct discussion:

- 1.12.1 The reconciliation of Blythburgh and EDFE traffic data.
- 1.12.2 The density and speed of traffic on the A12. A safe light-controlled crossing on the A12 within the village is provided for pedestrians, with school children of particular concern.
- 1.12.3 Permanent number recognition speed cameras are installed on the A12 north and south of the village. Blythburgh must become known as a place where speeding will always be penalized.
- 1.12.4 Barriers are installed on the east side of the A12 between the Angel Lane junction and the river bridge, to protect properties from speeding vehicles that leave the road.
- 1.12.5 Through (rat-running) traffic should be deterred from using the B1125 (Dunwich Road and Angel Lane) in the village. Number recognition speed cameras should be located on the B1125 in the village.
- 1.12.6 The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby’s Walks) should be improved as an alternative route for displaced traffic. Consideration should be given to linking this road with Wenhaston Lane at a new roundabout. The B1125 in the village should be engineered to make it unattractive for through traffic.
- 1.12.7 The potential for fly-parking in Blythburgh should be recognized and proposals developed to minimize it.

(See below 2.7.2-15 and 2.10.)

Blythburgh parish council’s response to Stage 1 and 2 Consultations is included as Appendix C, in italics -- *given as Appendix 3 and 4 respectively in Stage 4 Consultation response.*

2. DETAILED RESPONSE

2.1 SIZEWELL C PROPOSALS: OVERALL

2.1.1 INTRODUCTION

2.1.1.1 These representations are made on behalf of Blythburgh parish council.

2.1.1.2 They were drafted by the council's Planning Advisory Group, modified in the light of Planning Aid England's comments, and agreed after discussion at a parish council meeting on 25 March 2019.

2.1.1.3 The council is concerned that the negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1 and 2 Consultations (Appendix C), do not appear to have been addressed. The Stage 3 documents contain no references to mitigation action or expenditure of specific benefit to Blythburgh.

2.1.1.4 There is insufficient information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will indeed be mitigated [Stage 3 doc. 6.6.29].

2.1.2 CHARACTER AND LOCATION OF BLYTHBURGH

2.1.2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a parish in northeast Suffolk, nine miles north of the Sizewell C site. Blythburgh's small village has grown up straddling a trunk road, now the A12, created in 1785. The parish has approximately 300 residents. (See map p.1 for the location of Blythburgh in relation to Sizewell.)

2.1.2.2 Blythburgh is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with tidal river, marsh, heath, small woods, pasture and arable fields. AONBs have the highest level of protection in relation to landscape and scenic beauty (National Policy Statement for Energy (EN-1), section 5.9.9).

2.1.2.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village, protected by a conservation area.

- 2.1.2.4 Blythburgh should be considered as, and protected as a heritage asset, in terms of NPS (EN-1), sections 5.8.2-4.
- 2.1.2.5 Blythburgh is a very popular tourist destination. Visitors keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the years. The visitors include church lovers; artists; birdwatchers; music lovers and others who come seeking relaxation in a rural environment.
- 2.1.2.6 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.
- 2.1.2.7 Blythburgh village is divided physically and mentally by the A12 trunk road and the B1125. The roads pass through the centre of the conservation area. Existing problems will be exacerbated by the Sizewell development: traffic density and speed; dangerous bottlenecks and junctions; the lack of safe crossing points for pedestrians; discontinuous footpaths, and the impact of rat-running vehicles on the B1125.
- 2.1.2.8 Equally, the demographics of Blythburgh are important to understand. The parish has an ageing population. Although this is not uncommon in Suffolk or other parts of the country, its significance in relation to the proposed development of Sizewell C is that many residents of Blythburgh will live through the negative impacts of the construction period, but are unlikely to enjoy any of the potential benefits. Blythburgh parish council therefore urges that this is taken into account in relation to mitigation and compensatory action and expenditure.
- 2.1.2.9 Blythburgh also has a number of schoolchildren and their safety in using school buses that stop on the A12 is an important consideration.
- 2.1.2.10 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh parish council is therefore keen to ensure that any development of Sizewell C takes this into account.

2.2 MAIN DEVELOPMENT SITE: ENVIRONMENT

- 2.2.1 Blythburgh parish council recognizes that the Sizewell project will inevitably have an environmental impact and cause disruption. The council is concerned that the use of green-field sites has not been minimized. Every effort must be made to return any area, used during construction and not required for operation, to current land use, with the enhancement of environmental quality where this is possible.

- 2.2.2 Blythburgh parish council is not convinced that sufficient account has been taken of the negative impacts on the internationally important Minsmere nature reserve, in respect, for example, of contamination from waste and surface water, and noise and light pollution.
- 2.2.3 The disturbance of coastal processes is also of concern to the council. The loss of shingle from the Walberswick and Minsmere coastline, and impact on the tidal character of the Blyth estuary, with its implications for the flooding of properties in Blythburgh, must be avoided. (See section 2.9 below and Appendix A.)

2.3 MAIN DEVELOPMENT SITE: NEW ACCESS ROAD

Blythburgh parish council would support a solution that minimized the use of land and, by bridging rather than physically separating parts of SSSI, avoids the fragmentation of natural habitats. The views of specialist agencies such as Natural England must be taken into account.

2.4 MAIN DEVELOPMENT SITE: MANAGING CONSTRUCTION MATERIALS

Blythburgh parish council would, in principle, support a “near location” for borrow pits during construction to keep HGV traffic off access routes, although the council is concerned about the scale of the proposals. However, the creation of a new access route to facilitate the movement of material to the south, would obviate the need for borrow pits. On environmental damage, we would lend our support to the views of Natural England (as experts in this field) regarding the preferred option.

Once the plant is operating we would urge that the impact of the creation of borrow pits during the construction phase be mitigated and the land restored as soon as possible to its former state (or better).

2.5 ACCOMMODATION: OVERALL STRATEGY

- 2.5.1 Blythburgh parish council recognizes that housing workers at a campus reduces traffic flows on the local road networks during the peaks associated with shift changes and day worker patterns, and would provide job opportunities for local communities during the construction phase and the possibility to move to jobs on site during the operational phase. This would represent mitigation of some adverse impacts.
- 2.5.2 However, the council has concerns about utilising a green field site for the campus. The lack of provision of legacy housing where it is needed, is also a matter for concern. The campus should be built at a location or

locations, and to a standard to provide legacy housing for local communities or, for example, student accommodation.

The proposal for a sports facility to leave a legacy facility for local residents is welcomed.

- 2.5.3 The parish council has concerns regarding the recreational and homeward journeys of workers housed in the proposed campus. Such movements are not controlled and have the potential to swamp small local communities and increase traffic flows on the B1125. (See 2.7.6-12 and 2.10.3 below)

2.6 ACCOMMODATION: CAMPUS LAYOUT

Blythburgh parish council considers that the location of the proposed campus and the failure to provide legacy accommodation do not satisfy the criteria set out in section 2.5 above.

2.7 TRANSPORT: OVERALL STRATEGY

- 2.7.1 Blythburgh parish council supports action to reduce the volume of freight carried by road; the council regrets the elimination of the sea option and the pessimism about the use of the rail-led strategy. The council believes that while the proposals for campus accommodation (see sections 2.5-2.6) and the park and ride facilities (section 2.10) will have positive advantages for EDFE, and will reduce the number of vehicles on the roads between the A12 and the Sizewell site, there will be negative consequences for existing businesses, tourism and local communities.
- 2.7.2 Blythburgh parish council is pleased that EDFE has recognized the concerns of several consultees about speeding traffic and the exacerbation by SZC traffic of existing problems [Stage 3 doc. 5.2.25]. Blythburgh parish council welcomes the proposal for EDFE discussions with individual communities. EDFE should provide appropriate specialists for such discussions. See 1.12.1-7 above for a list of proposals for discussion.
- 2.7.3 The recognition of the impact on some local villages and the provision of bypasses is welcomed. However, there is no evidence in the Stage 3 documentation of action to mitigate the specific negative impacts on Blythburgh already identified in the Stage 2 response (see 2.10 below and Appendix C). Blythburgh parish council is concerned that only HGVs will be controlled; LGVs and private cars will be controlled only indirectly through parking permission at the site and the provision of Park and Rides. Parking permits linked to name but not vehicle number would make it impossible to monitor rat-running or non-contractual use of minor roads.

- 2.7.4 Concerns about the B1125 have already been recognized by Suffolk County Council's Highways Unit, with 'Blythburgh Village Only' signs installed at each end of the village route. However, the signs are generally ignored. *Blythburgh Conservation Area Appraisal* (Suffolk Coastal District Council July 2012) p.17 states 'The road from Blythburgh to Leiston ... could be altered to make it accessible to the village but no longer a through road.'
- 2.7.5 Blythburgh has a commendable record in action to mitigate the impact of high traffic flows on the village. The village has had to raise its own money for Vehicle Activated Signs for use on the A12 and B1125, and for Gateway Signs on the A12. Blythburgh has a Community Speedwatch Group, the first to be formed in Suffolk.
- 2.7.6 The EDFE proposals – for a road-led strategy - would leave Blythburgh with even higher traffic flows and one of the few communities between the M25 and Lowestoft not to be bypassed. Wrentham to the north has a light-controlled pedestrian crossing and to the south, Farnham, for example, has pedestrian refuges, but Blythburgh, where traffic on the A12 (Location W), includes that joining from the A145, A1095, and B1125 has no safe pedestrian crossings. Yet more traffic is proposed without mitigation. Using the capacity of a road as the sole criterion for the acceptance of proposals neglects the amenity of residents.
- 2.7.7 Additional noise, extending beyond the current high-traffic-flow periods, is of concern. NPS (EN-1) 5.11.4-5 requires *a prediction of how the noise environment will change with the proposed development, in the shorter term such as during the construction period and the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should also be considered.*
- 2.7.8 Blythburgh parish council's traffic data for the B1125 cannot be reconciled with the much lower figures at location L presented by EDFE [Stage 3 doc. Table 6.2].¹
- 2.7.9 EDFE show an average base-line daily two-way flow at Location L as 1650 rising to a daily peak of 2500-2550 in the road-led strategy. Blythburgh parish council's monitoring gives 1260-1665 for current northbound traffic ONLY, depending on the time of year. EDFE's flows seem to be only half what they should be. A much higher flow assumed by EDFE on the B1125 in Westleton, at Location F (2400 rising to 3500-3600) also demands explanation.

¹ Blythburgh parish council, in correspondence with EDFE, has received confirmation that traffic flows are the sum of two-way movements. The council will be meeting EDFE to discuss the significant discrepancy between its and EDFE's figures.

- 2.7.10 The project documentation includes a prediction that peak morning flows on the B1125 will increase by 27% at location L. The assumption that the B1125 can carry additional traffic [Stage 3 doc. 6.12.4] takes no account of the 100m Angel Lane bottleneck at the junction with the A12. Vehicles of SUV size and larger cannot pass one another and tailbacks are common. There is no footpath for pedestrians. (See also 2.10 below.)
- 2.7.11 Blythburgh parish council understands that the assumption of increased traffic on the B1125 is partly attributable to outages for Sizewell B (Tom McGarry presentation to parish council, 12.03.19). The council questions why this traffic cannot be instructed to use the improved routes to the site that will be provided for the SZC development.
- 2.7.12 Number recognition speed cameras should be located on the B1125 in Blythburgh. The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby's Walks) should be improved as an alternative route for displaced traffic. This was proposed in a traffic strategy document prepared by the parish council in 2013 and not excluded by the county council's consultants Keir MG, although a cost would be involved. The village roads should be engineered to make them unattractive for through traffic.
- 2.7.13 Fly-parking happens in Blythburgh. The prospect of it becoming a regular feature, on an increased scale, in the church car park and in Angel Lane for example, is of concern. (See 2.13.5 below).
- 2.7.14 Blythburgh parish council urges that all site traffic should use only designated routes and control measures to guarantee this should be established.
- 2.7.14 Blythburgh Parish Council is concerned that EDFE makes no reference to the monitoring of air quality associated with increased traffic flows through Blythburgh, particularly at the A12 / B1125 junction. We would urge that air quality be included in future discussions with Blythburgh parish council.

2.8 TRANSPORT: RAIL

- 2.8.1 Blythburgh parish council supports a rail-led strategy but is concerned at the pessimistic tone adopted in the Stage 3 documents. However, road improvements included in the road-led strategy should also be adopted as part of the rail-led strategy.
- 2.8.2 If EDFE go ahead with the road-led strategy, Blythburgh parish council urges that certain rail improvements included in the rail-led strategy should also be part of the road-led strategy.
- 2.8.3 The improvements should include development of the Saxmundham - Leiston branch line with automatic level crossings and necessary

upgrades to the track (Vol.1, Chapter 9, Stage 3 Consultation). The Woodbridge to Saxmundham section of the East Suffolk line, currently single track, should be improved by reinstating the double track over the entire section. Repairs or replacement of existing track to freight standard and signalling upgrades are needed in some areas. This would be an important legacy development, permitting increased freight and passenger traffic during the construction and operational phases of Sizewell C.

- 2.8.4 In addition to the freight trains, the use of one of the various types of 'Rolling Highway' systems should be considered, comprising of a series of very low flat wagons. Lorries drive up a ramp and then along the length of the train to the furthest empty wagon. At the destination the locomotive is removed, a ramp swung into place and the trucks driven off.

If such a train could take 25 HGVs, running five trains a day of this type would remove 250 HGV movements from the roads. Such a scheme would require a depot in the Ipswich area.

These systems are in use in France, Italy, Austria and Switzerland among other countries .

2.9 TRANSPORT: SEA

Blythburgh parish council regrets the loss of sea transport, except for a possible beach facility. The council is concerned that full account has not been taken of the fragility of the coastline and its probable retreat, the probability of more frequent tidal surges, and the expected rise in sea level. (See 2.2.2 above.) The merits of the beach-landing facility require further consideration.

See Appendix A for discussion of the coastal infrastructure and impact on Sizewell marshes, in relation to the National Policy Statement on Energy.

2.10 TRANSPORT: PARK AND RIDE

- 2.10.1. The proposed Park and Ride at Darsham is 4½ miles south-west of Blythburgh. Blythburgh parish council acknowledges that its creation will decrease the number of vehicles travelling to the construction site, the area needed for vehicle parking there, and facilitate the use of designated routes.

- 2.10.2 However, the full flow from the north on the A12 of HGV, bus, LGV and private car traffic generated by the project will pass through Blythburgh village. It should be noted that Blythburgh church and the village hall are on one side of the A12, and the White Hart and most of Blythburgh's

population on the other. Schoolchildren must cross the A12 to catch school buses. (See also section 2.7 above and 2.10.9.)

- 2.10.3 It is clear that existing problems with traffic flows through Blythburgh on the A12 and B1125 will be exacerbated and the recognized dangers at A12 junctions in the parish between the A1095 (to Southwold) and Hazel Lane (to Wenhaston) will increase.
- 2.10.5 The A12/A145 junction is of particular concern. Its layout is confusing and hazardous. Vehicles turning right from the A145, crossing two streams of traffic, have problems and tailbacks are common. Sizewell traffic will exacerbate these problems and the junction should be modified, possibly with a roundabout. This would have the additional benefit of reducing the speed of vehicles entering Blythburgh from the north.
- 2.10.6 The Park and Ride offers the prospect of a legacy facility of value to users of Darsham station but there is no reference to this. The provision of a roundabout to improve access is welcomed and should form part of EDFE's final submission.
- 2.10.7 The experience of the Latitude Festival at Henham Park is relevant. Traffic flow data show that vehicle numbers were less important than the speed with which the vehicles left the A12 for the festival site. A failure to get traffic off the A12 onto the festival site quickly caused many miles of tailbacks until 2016 when a traffic management plan dealt successfully with that and other issues.
- 2.10.8 A12 delays will have a cost for regular users. Access to Darsham station will be affected with consequences for rail travellers. Regular southbound travellers from north of Blythburgh will be tempted to avoid delays by seeking alternative routes along minor roads, including the B1125 through Blythburgh village.
- 2.10.9 The speed of traffic is as important as the numbers of vehicles. Blythburgh parish council's speed-monitoring data show that speeding is a particular problem early and late in the day. The council believes that the village will be exposed to danger from speeding traffic at shift changes. There is a history of vehicles leaving the road at the White Hart bend, resulting in fatalities. Protection of the properties on the east side of the A12, from the Angel Lane junction to the Blyth river bridge, is required in mitigation. (See www.eadt.co.uk 'Blythburgh, crash' reports.)
- 2.10.10 It must also be noted that the Darsham level crossing on the A12 will close up to twice every hour between 0700 and 2300 hours. Park and Ride traffic in both directions will be affected.
- 2.10.11 Given that the Park and Ride facility offers no direct benefits to Blythburgh, and that Sizewell traffic will exacerbate existing traffic

problems, the parish council urges that these issues and proposed mitigation (see also 2.7 above) form an outline for direct discussions between EDFE and Blythburgh parish council.

See 1.12 above for a list of topics for discussion. Fig.1 below illustrates the traffic issues and proposed mitigation.

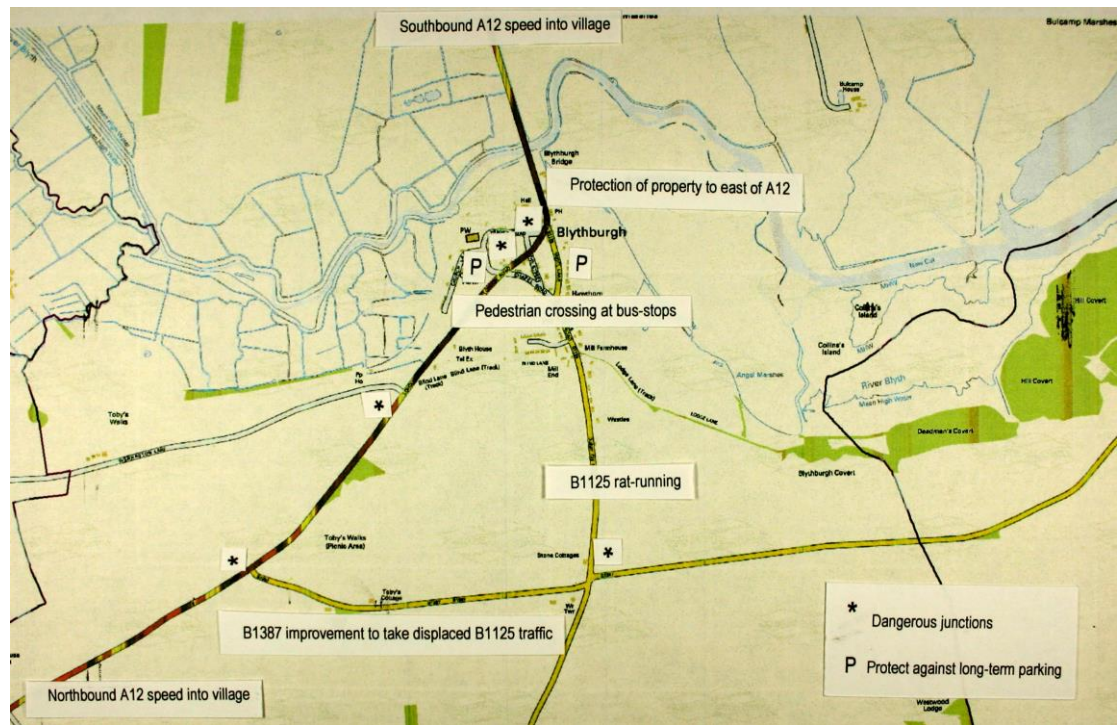


Figure 1. Blythburgh traffic issues and proposed mitigation

2.11 TRANSPORT: ROAD IMPROVEMENTS – A12

2.11.1 Blythburgh parish council supports the principle of improving the A12, not only to facilitate the movement of vehicles to the Sizewell site, but also to minimize the disruption of existing A12 traffic.

2.11.2 The council supports the proposal for a two-village bypass around Farnham and Stratford St Andrew, as beneficial to existing users of the A12 and the villages concerned.

2.11.3 Blythburgh parish council were not convinced of the merits of a four-village bypass, in the context of the Sizewell project and support its removal from the Stage 3 proposals. The basis of this view was that a four-village bypass would deliver traffic more quickly to the potential bottleneck at Yoxford (see Section 2.12) and the large investment involved could be better spent in mitigation action elsewhere. However,

if public funding could be secured the four-village bypass could be supported.

- 2.11.4 Blythburgh parish council also welcomes the proposal to build bypasses for Middleton Moor and Theberton. The parish council does not have the local knowledge necessary to judge the particular routes chosen.

2.12 TRANSPORT ROAD IMPROVEMENTS – YOXFORD/B1122

- 2.12.1 Blythburgh parish council welcomes the proposal to build a link road from the A12 south of Yoxford. The parish council does not have the local knowledge necessary to judge the particular route chosen.

- 2.12.2 The connection for A12 traffic from the north to the proposed link road is also welcomed. Blythburgh parish council is concerned that the link road is not also part of the rail-led strategy. It is highly desirable as a means of bypassing Yoxford, to protect the village, the junction with the A1120, and existing users of the A12.

- 2.12.3 No alternative routes in the event of road blockages or emergencies have been identified. Blythburgh parish council fears that in the event of an incident, traffic from the north will be routed on the B1125 through the village. Blythburgh parish council is concerned that possible alternative routes, such as the B1125, could not without improvement safely carry heavy Sizewell traffic.

- 2.12.4 A link road from south of Yoxford would provide a valuable legacy, of continued value during Sizewell C operation. Responses to an emergency at Sizewell would be facilitated.

- 2.12.5. Blythburgh parish council is aware that responses to some of its concerns about highway matters will be the responsibility of EDFE, and for others the Highways Authority. The parish council urges close cooperation between the relevant agencies to ensure that the optimum solution, reflecting the communities' interests as well as those of EDFE, is adopted.

2.13 PEOPLE AND ECONOMY

- 2.13.1 Blythburgh parish council welcomes the prospect of attracting more people to live in the village during the construction and operational phases, especially young families who would balance the community's age profile, and engage in local activities,

- 2.13.2 Nevertheless, the council is concerned that the tourist trade will be damaged, through the loss of accommodation, disturbance at attractive locations, and deterring visitors by congestion and delays on the A12 and

tourist routes. In Blythburgh village the White Hart, and B&Bs in the parish depend upon tourists. The church attracts thousands of visitors every year and they make a significant contribution to the cost of maintaining the fabric.

- 2.13.3 Mitigation through grant aid to enhance tourist facilities and their promotion is proposed. NPS (EN-1) 5.12.3 requires that such socio-economic impacts be addressed.
- 2.13.4 Blythburgh village hall hosts many organisations and functions, from the village and beyond. The church houses prestigious events such as the Aldeburgh Festival. Noise, disturbance and unauthorized parking in the village must not be allowed to reduce the attraction of Blythburgh for such activities.
- 2.13.5 Blythburgh parish council is concerned about the prospect of the village being used for fly parking by car-sharing pools. The council notes that driver-based authority to park at Sizewell is expected to reduce car-sharing. However, the church car park is especially vulnerable, and Chapel Road and Angel Lane are locations where long-term parking already happens. Mitigation is urged through the imposition, if necessary, of parking restrictions on village roads (but minimizing the effect on residents) and financial support for the church authorities if experience shows that a barrier is needed at their car park. (See also 2.7.13 above.)
- 2.13.6 Blythburgh parish council welcomes any increased educational and job opportunities arising from the Sizewell project, and the benefits that arise from the supply of goods and services. EDFE should partner with local schools and colleges to highlight opportunities. EDFE should seek to partner with local business suppliers where feasible.
- 2.13.7 The council is concerned at the prospect of attracting local workers for the Sizewell project, in an area of low unemployment. The employment of local tradesmen would denude existing businesses of their workforces. Residents would find it difficult to obtain plumbers, electricians and other services. Mitigation should include the provision of training opportunities for local young people to fill skills gaps and deal with the consequences of skills' migration.
- 2.13.8 The possibility of employment at Sizewell for young people and others who may not have their own transport would be enhanced if buses from Lowestoft and Ipswich picked up passengers at points along the route to Sizewell. The establishment of mini-bus shuttle services to the Park and Ride facilities, from such places as Halesworth through local villages, should also be considered. Consideration should be given to the provision of mopeds for local workers where other means of travel to the site or Park and Rides are not viable.

2.13.9 Sizewell needs to be self-sufficient for its workers' health care, to avoid placing an additional load on stretched local resources. Sizewell's recruitment policy should avoid damaging local facilities by poaching staff. Mitigation by providing financial support to local health services should be considered.

2.14 CONSULTATION PROCESS

2.14.1 Blythburgh parish council is concerned that its response to Stage 1 and 2 Consultation (See Appendix C) does not appear to have had any effect on proposals concerning Blythburgh. The new proposal to consult with individual parish councils, including Blythburgh, is welcomed and should be a necessary part of the process. (See 1.12 and 2.10.11 above.)

2.14.2 Blythburgh parish council is concerned at the lack of transparency in the consultation process. The responses to Stage 1 and 2 Consultation are not publically available (unless respondents themselves have chosen to share them). The Stage 2 proposals cannot be related to Stage 1 responses. The existence of confidentiality agreements between EDFE and some organisations further inhibits public debate.

2.14.3 The local exhibitions were a valuable opportunity to gain information and ask questions.

2.14.4 The provision of help from consultants from Planning Aid England was valuable; about the process of consultation and the presentation, if not the content, of responses. The consultants admitted that they lacked local knowledge.

APPENDIX A

(See Section 2.9 above.)

Coastal Infrastructure

1. There are concerns at the lack of detail provided in regard to the design of the proposed coastal infrastructure and the lack of evidence regarding potential environmental impacts.
2. We are pleased to note that the importance of the catchment area of Minsmere Old River and its tributaries has been recognised (8.11.2-3). However, the effects of these impacts of the development on coastal processes and on flooding remains the most serious concern about the proposed development. This is an area of low lying poorly protected coastline, which is already prone to serious flooding problems. The long term effects could dangerously endanger areas of international nature conservation importance, such as RSPB Minsmere, whose frontage adjoins the proposed site, as well as other International designated sites, further up the coast at Walberswick and Benacre.
3. It needs to be understood how Sizewell C might place additional pressures on this coastline and it's underlying processes. At this stage there is insufficient detail available to enable any understanding of the implications for the coast and its environs or any reference of potential mitigation options prior to the development.
4. A significantly greater level of detail is required to underpin more robust evidence (including Habitats Regulation Assessment (HRA)) of potential impacts, and a plan of any required mitigation to ensure that adverse effects on the integrity of designated sites are avoided.
5. The following are just a few of the designated sites along this part of the Suffolk coast:

The Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI)

The Minsmere to Walberswick Special Protection Area (SPA)

The Minsmere-Walberswick Heaths and Marshes Special Area of Conservation (SAC)

The Minsmere-Walberswick Heaths and Marshes Ramsar

6. These sites contain a complex mixture of habitats, including mudflats, shingle beach, reedbeds, heathland, fen and wet grazing marsh, with important birds, including breeding wetland and heathland species and wintering raptors, wildfowl and waders. It also supports scarce plants and invertebrates. While breeding and wintering bird populations, include Bittern, Marsh Harrier, Avocet, Stone Curlew, Nightjar, Woodlark and several wildfowl species.

7. We also have major concerns relating to the location and potential impacts of the proposed Beach Landing Facility (BLF), as described in paragraphs 7.5.91-98. This indicates that the BLF could form an important part of the coastal defences should the shoreline to the North retreat. If the BLF is not developed, what alternative construction will be required for landing the proposed rock armour?
8. These proposals for better harder protection here will almost certainly affect coastal processes and sediment transportation, causing an acceleration of erosion problems to the North.
9. Paragraph 7.4.79 states that there have been no significant changes to the majority of the design of the permanent Sizewell C sea defence since the Stage 2 consultation. We understand that the primary coastal defence is to be an embankment with a crest height of 10.2m AOD, with a layer of rock armour embedded within it (paragraphs 7.4.78-81). This will entail the removal of County Wildlife Site (CWS) grassland along the length of the frontage. This grassland is of high value for plants and invertebrates and migrant birds.
10. We are concerned that insufficient attention has been given to the potential seriousness of any effect on changes to erosion rates or flow patterns in this area, more research and local advice should be sort before any work is approved.
11. For a brief description of potential impacts we have to refer to the Stage 2 documentation. Paragraph 7.9.60 indicates that the primary concerns would be effects on shape and geomorphology of Sizewell Bay and longshore with paragraph 7.4.69 indicating that the BLF could act as a foreland causing the shoreline to the North to retreat. However, paragraph 7.4.68 states that the BLF will have minimal impacts on sediment processes and monitoring will be in place to ensure impacts are detected and managed. We feel this is untrue and how will this be managed ?
12. The lack of sediment processes are certainly going to impact even more on the bay between Dunwich and Walberswick increasing the risk of flooding around Walberswick harbour area, and further up steam on the Blyth Estuary including Tinkers and St Felix marshes and more importantly a much increased threat to properties in Blythburgh.
13. It is noted in paragraph 7.4.60 (Stage 2) that a landscaping scheme is proposed to reinstate coastal dune grassland following construction. It is also stated that the defence could be raised to a crest height of 14m AOD at a later stage if monitoring suggests further improvements to defences are necessary. It is concerned that planting following construction will probably not produce habitat of similar quality to that lost, also that repeated disturbance (if defences require upgrading) would cause further damage to any recovering vegetation/invertebrate populations. Given the importance of this dune grassland and the specialist species it supports, our view is that

consideration should be given to providing compensatory habitat, which should be established before work commences. The work already carried out to create wetland to the West of Sizewell B is totally inadequate and poorly designed.

14. Paragraph 7.4.12 (Stage 2) notes that the new Sizewell C sea defence embankment would be positioned further to the East than that of Sizewell B. Whilst we acknowledge that this reduces the land take for Sizewell C, the ground disturbance alone will create loss of habitat.

Sizewell Marshes SSSI

15. The Sizewell C proposals include part of Sizewell Marshes SSSI within the development site. Is there no alternative location for this expansion? The Site Assessment for Sizewell C in Vol. II of EN-6 (Annexes to the National Policy Statement for Nuclear Power Generation) states in paragraph C.8.65 that:

'The Government has also noted that there will be further assessment of any proposal for the site at project level and that EN-1 sets out detailed consideration that must be given to issues related to nationally designated sites, should an application for development consent come forward.'

16. This refers to policies set out in EN-1 (Overarching National Policy Statement for Energy). Paragraph 5.3.11 of EN-1 states:

'Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The IPC [now PINS] should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.'

17. This is essentially consistent with the policy set out in the National Planning Policy Framework with regard to SSSIs. The tests set out in paragraph 5.3.11 of EN-1 are intended to ensure that SSSIs are only damaged (i) where there is no alternative location for the development and (ii) where the benefits of development at that site clearly outweigh both the impacts on the features of the SSSI itself and any broader impacts on the national network of SSSIs. Compensation should be considered as a last resort only when it has been proven that no alternatives to the proposal exist.

18. We note that Section 14 is concerned with assessments that are subject to their own regulations and requirements. We request that further detail, supported by evidence, is provided to show that these potential impacts have been considered in relation to all statutory requirements and if necessary, mitigated. Evidence should be provided to enable understanding of the potential construction impacts, the scenarios under which these coastal protection elements would come into play, and the likely effects of this defence on ecological receptors and designated sites.

We expect to see greater detail regarding the potential environmental impacts of this, and are particularly concerned about effects on flood risk (in terms of frequency, severity, extent or duration).

19. We are concerned that the proposed defence line could act as a hard point and intensify erosion elsewhere along the frontage and to areas to the North.

APPENDIX B

MITIGATION PROPOSALS

Blythburgh parish council wishes it to be noted that the majority of its mitigation proposals are little changed from those presented in response to the Stage 2 consultation and are evidence that thus far the direct impacts on the village have not been recognized by EDFE.

SECTION IN BLYTHBURGH PARISH COUNCIL RESPONSE TO CONSULTATION	ISSUE RAISED BY BLYTHBURGH PARISH COUNCIL	MITIGATION REQUESTED BY BLYTHBURGH PARISH COUNCIL
Summary	Use of B1122 for access to construction site not feasible	Building of a new link road, with the by-passing of Yoxford, is supported.
4. Main Construction Site. Managing Construction Materials	Borrow Pits used during construction phase	Return to former state or better at end of construction phase / start of full operation
5. Accommodation. Overall Strategy	Impact on communities and environment	Creation of local job opportunities at the Campus would provide some mitigation for disruption.
		Provision of legacy housing
7. Transport. Overall Strategy	Improvement of access to park and ride welcomed.	Provide legacy parking for the period of full operation and for Darsham train station users.
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Speed cameras with number plate recognition located on the B1125 in Blythburgh B1387 from its junction with the B1125 to the A12 should be improved as an alternative route for displaced traffic Village roads should be engineered to make them unattractive to through

		traffic
	Only HGV Vehicles will be controlled. Light goods vehicles will only be controlled indirectly by parking permissions	All site traffic should use only designated routes and control measures to guarantee this should be established for both construction and the period of full operation
	Ability to monitor rat-running	Use number plate recognition system
		Maintain number recognition systems for the period of full operation of Sizewell C, NOT just during construction phase.
8. Transport Rail	Removing HGVs from road network is supported but more is needed.	The Woodbridge to Saxmundham line should be dual tracked to remove further HGVs from local road network and provide legacy rail link to operational site
	Some road improvements are not part of the rail-led strategy.	The road improvements described in the road-led strategy are also required with the rail-led strategy.
		In addition to freight trains one of the rolling highway train systems should be considered
10. Transport. Park & Ride	Park & Ride Darsham will have no impact on the additional traffic flow on the A12 through Blythburgh	School children using the school bus must cross A12 and the provision of a pedestrian crossing or refuge is required.
	The Park & Ride could create interruptions to traffic flows on A12 and create ripple effect which will impact Blythburgh Village. Experience of Latitude Festival at Henham Park is relevant. Traffic flow data showed that vehicle numbers were less important than the speed with which traffic left the A12 to the Festival site. A failure to get traffic off the A12 onto the Festival site quickly caused many miles of tailback	<p>Safe, light controlled pedestrian crossing on the A12 within the village.</p> <p>Permanent speed cameras installed on the A12 north and south of the village.</p> <p>Barriers installed on East side of A12 between Angel Lane and the River Bridge.</p> <p>Through traffic deterred from using B1125 by speed cameras in the village.</p> <p>B1387 should be improved as an alternate route.</p>

11. Road Improvements. A12	Blythburgh parish council does not support the 4 villages by-pass.	Monies could be better spent on other mitigation measures, but alternative source of funds would be welcomed.
12. Transport. Road Improvements. Link roads.	No alternative routes specified when roads blocked or an Emergency situation.	Need to have an alternate route specified which is not the B1125 through Blythburgh. The B1125 is not capable of carrying the heavy traffic.
	No route specified, if B1122 blocked, for an Emergency on the nuclear site.	A new access road from A12 to Sizewell site will provide emergency cover and a legacy facility.
13. People and Economy	Parish council concerned that tourist trade damaged through loss of accommodation or traffic impact on tourist routes.	Grant Aid to enhance and promote tourist facilities
	Parish council concerned about fly parking by car share pools to the Sizewell site during both construction and operation will impact on residents, functions and organisations e.g. Aldeburgh Festival.	Parking restrictions on village roads and, if necessary, mitigation against use of free car parking areas.
	Businesses damaged and tradesmen unavailable to local community through Sizewell C Terms of employment	Training opportunities for local young people to fill skills gap and loss of tradesmen.
	Positively support the employment of people from the local areas	Buses to pick up along the route to Sizewell. Mini-bus shuttle service to park & ride. Consideration of provision of mopeds under special circumstances
	Sizewell should be self-sufficient for its health care	Recruitment policy to avoid damaging local facilities by "poaching" without concomitant support for the local services.

14. Consultation Process	Concerns of individual consultees.	Discussions with individual parishes, including Blythburgh, is a necessary part of a robust consultation process and 'promised' in the Stage 3 consultation document.

APPENDIX C

given as Appendix 4 in Stage 4 Consultation response.

From: [REDACTED]

Sent: 15/12/2020

To: sizewell@edfconsultation.info

CC: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Sizewell C 5th Consultations Response

From: Catherine and Paul Richardson, Steel Sculptures Limited Ambleside, Leiston Road, Middleton, Saxmundham, Suffolk IP173NT As local business owners with a home and business very near the B1122, we are very concerned about the latest proposals for Sizewell C that have been submitted by EDF. The new plans about what can be achieved by rail and sea transport and their last minute introduction neither solve nor mitigate the problems for local arts based businesses such as ours, which depend on the beauty, tranquility and accessibility of the local environment as well as the visiting tourist industry. As a local sculpture business our supply routes will still be damaged by the new plans, especially in the early years before the extra sea and rail routes are due to be established. The estimated 600 HGV's on the existing B1122 in the 2-3 years before and link road, rail or sea routes can be built is a hazardous proposal for both business and road safety. EDF are not fully considering interests of the existing local economy let alone damage they will do to the health and well being of the local residents. Why are EDF still ignoring the County Council's preferred option to build a D2/W route instead? The rail proposals include up to 7 freight trains running at night, rising to 10 in peak periods. This is an unacceptable noise level for the local residents at night. It will add to rather than mitigate the noise pollution hours during day from the planned road and rail transport required by the project. As a local resident I am fearful for our local environment and local coastal defences. If sea transport is genuinely an option why were these proposals not offered much earlier in the process, at the very least at Consultation 4? How can interested parties or the planning authority assess the impact of the proposed beach landing facility when EDF have not provided sufficient details? It seems that hard sea defences are now being proposed and yet no specific design for the defences has been submitted. If hard coastal defences are required they will have a significant impact on the coastlines in Aldeburgh and Thorpeness. How can EDF ensure they won't have detrimental affects on the coastlines of our highly valued neighbouring tourist towns? EDF's current proposals for Sizewell C threaten the future of our business and therefore our home. The use of the B1122 blocks our main route to and from our site with huge amounts of HGV traffic in the early years and an impractical link road further into the project. It will disrupt

our clients visits and create an inhospitable environment with noise pollution. It will deter our drop by tourist clients reducing our crucial seasonal orders. Our brand and reputation has been built up over many years around being artists working from our Suffolk coastal workshop. The workshop and sculptures are well known in the area and further afield. If EDF's proposal's are passed in their current form we will be forced to consider relocating our home and workshop. Having survived the challenges of covid -19 lockdowns and the difficulty of competing to make original sculpture in a world market, the single largest threat that current faces our small business is EDF's new proposal for the development of Sizewell C. For local people, businesses, wildlife and environment this is the wrong project in the wrong place and we urge you to reject EDF's proposals. Catherine and Paul Richardson

**SAXMUNDHAM TOWN COUNCIL:
RESPONSE TO CHANGES TO THE SIZEWELL C
Development Consent Order (DCO)
DEVELOPMENT CONSENT ORDER SUBMISSION**



Saxmundham is a small market town with a population of approximately 4,500. It is located on the A12 mid-way between Ipswich and Lowestoft and about seven miles west of Sizewell. The Local Plan envisages Saxmundham growing in size by approximately 50% over the next ten years and this will give significant challenges to the town which currently lacks the infrastructure required to support this increase. The East Suffolk railway line runs close to the centre of the town and many of its older buildings which are situated in the town's conservation area.



Summary

- The Sizewell C consultations have been ongoing for eight years since the initial consultation began in November 2012. Yet, until this point, EDF have shown little sign of listening to local councils and residents' concerns. At this point, EDF have not demonstrated that they can deliver on the proposed changes.
- Saxmundham Town Council (STC) is pleased that a substantial percentage of construction material will now potentially be moved at sea and urges EDF to maximise this strategy.
- The council is concerned about the impact on our community of additional overnight freight trains passing through our quiet town for the entire period of the construction. It also views the proposed disruption to the passenger timetable as having a negative impact on residents and visitors to the area.
- Although there will be a reduction in HGVs along the A12, there will still be other local traffic for the Sizewell development, additional traffic for other proposed energy developments and the additional housing in Saxmundham which forms part of East Suffolk District Council's Local Plan and which has now been approved by the Planning Inspectorate.
- The council is unclear about the proposed changes to the sea defences and queries whether this will leave the existing Sizewell A & B plants at greater risk of flooding together with other coastal areas.
- STC has continuing concerns about the suitability of a new Nuclear Power Station in the centre of an area of outstanding beauty. These concerns have not yet been addressed either by EDF or by central government. As highlighted by wildlife organisations, the project will potentially cause long-term damage to priceless wildlife sites.
- STC hopes that, if consent is given to go ahead with the project, then funding will be available from the Community Fund to help realise the Neighbourhood Plan which is currently being prepared and which will secure the future of this expanding town.
- The council disagrees with EDF's assertion that Sizewell C construction will provide long-term benefits for the area as it has seen little evidence of this in respect of the existing Sizewell B power station.

The council makes the following detailed responses to the proposed changes:

1. The Overall Consultation Process

Whilst welcoming some of the changes that EDF has made to its proposals, the council is bewildered that it has taken eight years of consultations before the strength of public feeling on these issues has been recognised. At this late stage EDF should only be consulting on proposals it is certain it can deliver, e.g. the train and sea transport proposals are far from guaranteed, and relocation of Sizewell B facilities is subject to agreement with Sizewell A. If these indeed are serious options, why has it taken this length of time to propose them? Indeed, some of the proposals were originally put forward and then withdrawn for reasons known only to EDF.

The Council also considers that it is unacceptable that largely unpaid local councillors and members of the public should have to look through thousands of pages of documentation in order to read relevant information for their situation. It proposes that, in future submissions and other projects, the applicant be held responsible for preparing relevant papers for each town and parish in order to minimise this effort.

2. Freight Transport

Rail

Saxmundham Town Council has long argued for the upgrade of the East Suffolk Line to double working throughout its length. The government has clearly demonstrated during the Coronavirus pandemic that large-scale projects can be carried out swiftly when the will is there. Double line working would eliminate the need for overnight freight movements and greatly enhance the capacity of this track which will no doubt be advantageous for other 'Energy Coast' projects.

The possibility of additional overnight train movements on the existing track is of significant concern. There will be seven overnight movements during the five peak construction years with a possibility of nine if the daytime passenger schedule is adjusted. The impact upon town residents which EDF describes as 'having a major adverse effect' both in terms of noise and potentially damaging vibration, is as yet unquantified. Although EDF have mentioned mitigation actions such as double glazing and sound insulation, these will not work on warm nights when residents will have the choice of sleepless nights through high temperatures or train noise.

EDF have stated that around 600 dwellings will be impacted to some extent by the overnight movements. STC requests a list of those houses within the parish. It also questions whether they include the new properties situated near Street Farm Road, particularly in Beech Road, Holly Way and Oak Close since they are not shown on the maps that were provided. Given that the railway cuts right through the middle of the Saxmundham Conservation Area, the council would like to know if vibration effects have been considered on other buildings within this area. We also need to know what changes to the passenger timetable have been considered in order that we may judge the consequences to residents and visitors to the town and challenge them if necessary.

Sea

Saxmundham Town Council welcomes the re-introduction of the marine transport option and urges EDF to maximise the potential for this mode of transport while minimising the environmental impacts of the proposed beach landing facility and jetty. However, it notes that these plans are uncertain as no plan or impact assessment is given for either beach landing facility, or how the materials will be moved to the stockpiles which are at the other end of the site, close to the borrow pits.

Road and Associated Vehicle Movements.

The council notes that EDF are proposing a reduction of up to 30% in HGV road movements with a suggested maximum daily number of 700. However, any difficulties with trains or shipments would no doubt put HGVs back on the roads and EDF has still not clarified where the aggregate would come from. These new proposals would not have any impact on reducing traffic during the first two years, before new roads and Park & Rides would be completed. During these “early years” 600 trucks per day, plus those for other Energy Projects, and all other Sizewell C traffic would use the current A12 and B1122. Additionally, any difficulties with trains or shipments would no doubt put HGVs back on the roads and EDF has still not clarified where the aggregate would come from. Taken in conjunction with ‘local’ tradespeople, Park and Ride buses and other miscellaneous journeys, Sizewell C would still generate up to 12,000 extra vehicle journeys/day, massively increasing traffic on the A12, surrounding roads and making rat runs more likely. The A12 & A14 are already problematic; the Orwell Bridge, EDF’s Freight management facility and new roundabouts will all increase the risk of delays. The prospect of Felixstowe docks becoming a ‘Freeport’ will undoubtedly add to this congestion.

3. Sea Defences

Whilst acknowledging that EDF have rightly adjusted the scope of their sea defences to take greater account of climate changes, the council is unsure of the impact on the existing Sizewell A and B defences and on erosion to the north and south of the Sizewell site. It would welcome clarity on what is being proposed for the protection of the remainder of the nuclear site.

4. Environmental Issues

The council welcomes EDF's decision to change the SSSI crossing design to a single span bridge although it questions whether the widening of the culvert is sufficient to preserve the character of the area. It is what has been asked for all along on the grounds of being the least damaging option. It also notes that the Pillbox field may not need to be used for car parking which is another environmental gain. On the downside, it does not consider the provision of fen meadow habitat at Pakenham is adequate mitigation for the loss of habitat in East Suffolk. Like the other two compensatory habitats at Benhall and Halesworth, this site is miles away and cannot replace rare fen habitat loss in the Sizewell Marshes SSSI. It is also concerned that more trees will be lost from the site as a consequence of changes to the Order Limits. Overall, the council does not feel that EDF has adequately addressed the many concerns of the environmental organisations regarding habitat loss and wildlife disturbance.

5. EDF Promotional Activity

The council notes that EDF has been active in promoting the economic benefits of Sizewell C to the area. This statement is open to challenge as Sizewell B has been in operation since 1995 and, at a recent meeting in the town, Saxmundham was described as “the poorest part of her constituency” by the local MP. EDF clearly needs to demonstrate the long-term benefits to Saxmundham and the surrounding area rather than relying on its PR team. A distinction needs to be drawn between the short-term ‘caffeine-fuelled’ economy that will be created during the construction works and the continuing benefits that will result as a consequence of the operation. These clearly need to be offset against the losses to the local economy in the hospitality sector and other related areas.

Saxmundham Town Council 14th of December 2020



Together Against Sizewell C

TASC Response to the EDFE Sizewell C Consultation on Revised Plans Nov 18th 2020 to Dec 18th 2020

TASC continues to be totally convinced that the siting of Sizewell C (SZC) in the remote coastal Area Of Outstanding Natural Beauty is a disaster for east Suffolk. The responses to EDFE's four consultations have thrown up so many problems most of which EDFE have ignored, it now appears that they are only taking these concerns seriously due to Suffolk County Council's DCO representations. It is blatantly obvious that the problems of siting, transport, roads, rail, accommodation, the unimaginable environmental damage and the unbearable strain on people and businesses cannot be tolerated.

This has started already with the felling of a 100 year old historic woodland before any DCO planning consent has been given.

The many environmental and societal disbenefits far outweigh any perceived benefits.

TASC therefore remain firmly opposed to the SZC Project.

We will attempt to answer the consultation questionnaire in the order in which it is set out. Rather than resolving any issues, we see these proposals as an attempt to put a small sticking plaster on a massive gaping wound. TASC is also disappointed that after 12 years of deliberation and four previous consultations over 8 years, EDFE is still referring to options and possibilities without supplying supporting evidence. TASC believe this is a further flawed consultation by EDFE due to the lack of detail provided and the poor quality of the images presented, e.g. maps with no grid lines, with keys that are virtually impossible to read, indistinct pictures with insufficient reference points. It is such a vast project we may stray off the subject at times and add matters which we deem relevant.

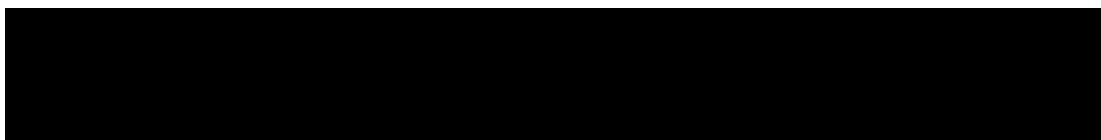
1) Freight Rail

The main reason for the new revised figures for rail movements are the many objections to the previously proposed numbers of HGVs. The efficacy and appropriateness of the use of rail was very doubtful in the first instance and any increase of use will exacerbate the difficulties. This is noted in Network Rail's Relevant Response to PINs. To date, we have no clear figures for the amount of materials and no indication of the location of their source, so how best to deliver to the SZC site must still be questionable.

2) Increased frequency of Freight Trains

The disturbance at night to people on the East Suffolk Line will be intolerable. Interference to the number of passenger trains on the East Suffolk Line should not be allowed.

We are doubtful of the accuracy of the noise survey as the train test undertaken may not have been carried out under the correct conditions.



We also have concern about the first 2 years of movement of freight which will be undertaken through residential areas of Leiston, and the distribution of loads when discharged at LEEIE which is then to be conveyed to the SZC project area.

Another issue for any increase in the number of trains will be the disruption to road traffic and to farm vehicles at level crossings causing delays and tailbacks.

Increasing rail use may alleviate the number of HGVs from the roads, if rail use is workable (which we doubt), but will cause severe problems of noise, pollution and vibration in and around the East Suffolk Line and the Leiston Branch Line area and disturbance to its residents in what is a reasonably quiet, unpolluted part of the country.

TASC disagree with the implication at 3.1.13 " that a significant number of deliveries would be smaller HGVs implying 3.5 tonnes would be the norm. Typical Articulated vehicle deliveries would be 44 or 38 tonne GVW , Rigid tippers 32 tonne GVW or Mixers 26tonne GVW.

TASC submits that the alterations to the proposed freight transport strategy simply reconfigure the problems associated with access to such a remote site and demonstrates again that the SZC project is not acceptable. Therefore, the suggested changes are inappropriate.

3) Enhancing the Permanent Beach Landing Facility (BLF)

Increased Materials by Sea and BLF

The damage to the coast and marine environment will be exacerbated by pile driving and by the suggested 30+m extension. The MMO has made observations on the previous proposals in its relevant response with well researched evidence that the BLF as originally proposed will have a detrimental effect on marine species and on sediment drift and will require continual dredging. TASC did not agree with the BLF in the earlier consultation so cannot agree with any suggested increase to length and construction.

We were told in the early days that any landing facility on the coast would be temporary: now it is to be permanent and there may be two of them.

This is inappropriate and unacceptable.

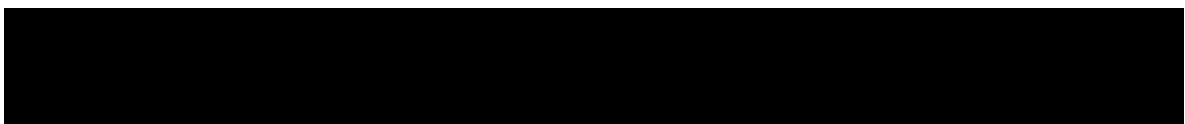
4/5 Temporary Beach Landing Facility

TASC considers none of the proposed options are feasible as the idea of a pier was considered too environmentally damaging in respect of both coastal erosion and sea-bed scour. All of the comments at 4 also apply to this suggestion.

Therefore, including yet another temporary BLF cannot be accepted.

3/4/5) No matter how the problem is disguised by artist's impressions, all the materials which may arrive by sea will have to be transferred to the site. The environmental damage to the Benthills, the Heritage Coast and Walks cannot be quantified as we do not know the volume of materials, frequency of the loads etc. All will need human intervention and will cause untold damage and will visually impact the AONB.

We recognise aggregates and soil are suggested as loads, but we have no idea of quantities or source of either. If sea dredged aggregates are to be amongst these loads it brings up further questions.



Also, far more information is needed on both temporary and permanent BLF including release of the previous environmental impact assessment that supported EDFE's contention that a larger BLF was too environmentally damaging.

TASC consider the suggested works to the permanent and temporary BLFs should not be entertained and both are inappropriate.

6) SSSI Crossing

TASC has requested at every consultation that an alternative access road should be considered. This has been ignored. The permanent access road leads to a crossing of the SSSI. Covering such a valuable area with concrete to install an access to the SZC site is the most appalling desecration of an SSSI.

This intrusion and the damage it will cause is intolerable, ugly and totally out of keeping with the AONB and SSSI. The new suggested 30m long span bridge is, in effect, still a culvert, just wider, and will be a permanent feature of the AONB landscape. Trying to disguise it with trees, suggesting it will reduce the possibility of flooding and will assist with water management is simply not credible.

It will be a constant haul route for many thousands of tonnes of materials by cars vans and lorries for the lifetime of SZC. It will also be used for taking AILs from the Beach Landing Facility.

It introduces HGV pollution, noise, light and dust into an otherwise dark quiet area which is currently linked to other designated habitats such as RSPB Minsmere and used by many animals, insects and birds for foraging. EDFE cannot be allowed to do so much irreversible damage.

TASC believes this suggestion is inappropriate as was the earlier proposal.

7) Fen Meadow Replacement

This is just not possible. To use the word 'replacement' just proves the absolute lack of understanding of the unique and rare habitat which is Sizewell Fen Meadow. To suggest it can be built over and recreated is utter nonsense.

EDFE may create new habitats but they will never replace that which they will destroy; the suggestion to the contrary is totally inconceivable and inappropriate.

8) Water Storage Area

This suggestion changes the water management of the area and it is our belief that it may not work. Wet woodland is a very specialised habitat and requires careful management. We are not convinced that safe retention of this habitat will result from EDFE's plans.

9) Surface water

This is the same method EDFE are suggesting for the discharge of water when dewatering the site. It would appear that none of this water will be monitored for pollutants from petrochemicals or any other contaminants and will simply be discharged into the sea. The North Sea is a precious resource and should not be used indiscriminately. We would wish to see a rigorous monitoring regime before agreeing to this proposal.

Therefore, at present we believe it is inappropriate.



10 Other Site Changes

a) Sea Defence

This suggested sea defence is a further 8 metres too far eastward of the green line causing further coastal squeeze, the suggested height exacerbates it as a dominant feature, its intrusion into the Heritage Coast and the AONB is unacceptable and it will be an eyesore in the coastal landscape. We suggest it will also cause flooding to the north and south.

TASC considers that the proposal to raise the height of the sea defences from 10.2 metres in the plans submitted in May 2020 to 14 metres a few months later in this October consultation, highlights the vulnerability of the Sizewell C site to the risk of flooding and the unpredictability of sea level rise, increased storm surges and more extreme weather events resulting from climate change. We should all be concerned that EDFE had obviously underestimated the likely impacts from climate change in their previous plans and the risks they still present.

The above supports TASC's opinion that the Sizewell C site is totally inappropriate for siting of a new nuclear power station and interim storage of its spent fuel.

b) Height limits and construction activities

It would appear that at every turn, EDFE want to use yet more land to accommodate their proposals. We do not agree with yet more space for stockpiling. EDFE were taking up too much land in the last consultation: adding further areas for stockpiling should not be allowed.

High structures on Sizewell Beach Landing Facility are inappropriate in the AONB.

c) Tree Retention

This is a loss of trees, not retention of them, due to taking up more land on the construction site, which is already cramped.

d) Boundary Changes

Main Construction Site boundary changes as proposed simply represents development creep and is unacceptable.

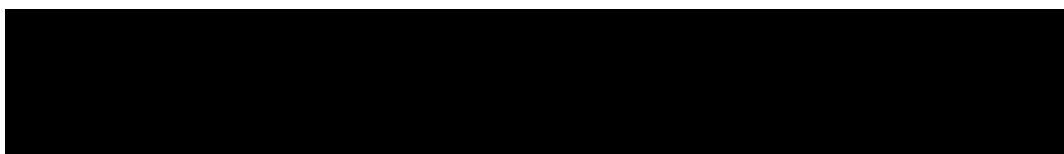
The other suggested changes for habitat creation will never replace what is to be lost from the Parish of Leiston cum Sizewell.

We do not agree to EDFE owning land outside the Project Area. These habitat areas should be given over to the parish, a management committee or Trust if and when they have been created.

e) Bridleway

This is an insult. Considering all the changes and diversions of the many historic sheep walks, bridleways and ancient footpaths that EDFE are to undertake over a large area of East Suffolk, it is inconceivable that this is the only one on which is being consulted on.

The loss of routes of many old footpaths, many which are connected to Leiston Abbey and the coast, is inexcusable.



We previously asked that a Community partnership was set up to consider the many changes to the RoW before it went to the DCO. It obviously did not fit in with EDFE's Plans.

11. Sizewell B Facilities Relocation (SZBFR)

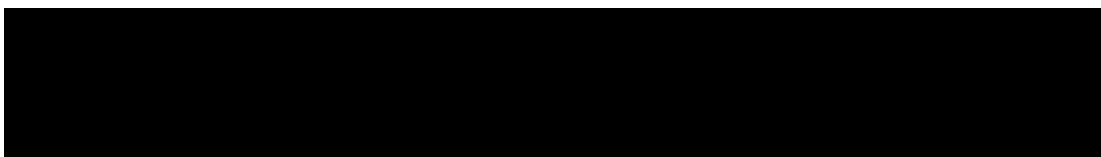
TASC consider the SZBFR demonstrates EDFE's contempt for the views of the local community-no one who responded to the initial planning application to East Suffolk Council agreed with the felling of Coronation Wood, yet EDFE's chainsaws are in the process of destroying it as this is written. EDFE have already been given permission to proceed with the SZBFR, have plans in their original DCO application, now have 2 options here and have submitted further plans to ESC. TASC are concerned that this reinforces the view that EDFE are either incompetent or have not bothered to develop clear plans for the Sizewell C development causing undue stress and uncertainty within the local community. TASC's opinion on the SZBFR options are:-

- They are inappropriate as there should be no further development creep into the AONB by the nuclear complex.
- Pillbox field should not be developed because of its visual impact on the AONB.
- Tree planting on Pillbox Field is unlikely to be successful due to the nature of the ground conditions.
- Sizewell A land should not be used for Sizewell B facilities as it should be returned to the community as a greenfield site in line with previous promises.
- It is a travesty that Coronation Wood is being felled for a car park and other facilities that could so easily be located outside the AONB, at a time when we know more than ever we should be protecting such carbon stores and biodiversity. All to make way for a project that may never happen.

In conclusion, TASC consider that the many suggested changes in the 5th Consultation show clearly that the SZC project can never be achieved, however you wrap it up. It will have a lasting long term damaging effect on the wellbeing of residents and cause irreparable environmental damage to the whole area of East Suffolk.

NB: This is an interim response, and we expect to make a further submission in due course.

TASC 09/12/20



[REDACTED]
Sent: 12/12/2020

To: sizewell@edfconsultation.info

CC: sizewellc@planninginspectorate.gov.uk

Subject: Responding to Consultation on proposed changes to Sizewell C

Dear Sir

I would like to object to the building of Sizewell C for the following reasons:

I own a small family farm [REDACTED]. Sizewell C will have a huge impact on the business.

I will lose:

- 32.23 acres of land to the railway line and footpaths
- 35.41+ acres of land for Theberton and Middleton bypasses

All of the land is irrigated for high value vegetable production, although it is stated in the consultation that some is grassland of very little agricultural value - which is not the case. without this land the farm is severely limited in its production of potatoes, onions, sugar beet etc. Also all of this land is in Country Stewardships which is not stated in the documents. This is known by Sizewell C as it has been mentioned many times at meetings I have attended with them, but they have never changed their stance.

Further to this I rent approx 20 acres of land to the east of Abbey Lane which will be lost to the railway line. I have never been acknowledged to be farming this land in any documentation - again this has been brought up at many meetings with EDF!

It also states further in the consultation that none of the landowners on the main site rely on agriculture for a main source of income. This is not true for me as I am a farmer who has used this as my livelihood and sole source of employment, and has been since leaving school.

There is also great concern regarding the traffic. Moving farm vehicles and access to the farm will be very difficult with the volumes of traffic planned. Also cars will rat run, particularly down Abbey Lane, past our house at Aldhurst Farm House. This together with the railway line at the bottom of our garden, with night trains, may prove difficult.

Light, noise and dust pollution at the farm and surrounding areas will also be a major concern. Possible crime and interference in the farmyard from the nearby accommodation proposals is also of grave concern.

In conclusion all of the above factors and incorrect factors in the consultation documents will make running my farm business very difficult unless measures are put in place to reduce the many impacts this development will have on my livelihood and others I employ.

Yours faithfully

John Poll

Darsham Parish Council

Submission to Planning Inspectorate re EDF's DCO for Sizewell C & D.

1. Introduction and scope of submission.

While Darsham Parish Council (DPC) shares the wider concerns about the impacts of EDF's proposals on transport, environment and tourism with the majority of local Parish Councils, and supports the views of the Environment Agency and national and local conservation groups, our submission concentrates on the siting and impacts of the Northern Park and Ride (NPR) which is located within the Parish Council boundary.

2. Consultation responses.

The concerns listed below have been detailed in our responses to each of the four consultation stages carried out by EDF. It is fair to say that these concerns, which are shared with other local parishes, have been largely ignored. As such, the term “consultation” is a complete misnomer.

3. Traffic flow and congestion (1)

EDF have consistently underestimated traffic flows on the A12. The A12 is a single carriageway road in this part of Suffolk. As such any road works or traffic accident is likely to cause major congestion. This has been vividly demonstrated this summer, with increased traffic volumes due to the COVID-19 pandemic and a considerable increase in tourism “staycations”. On two occasions, (one accident, one road repair) slow-moving traffic has tailed back five miles to Saxmundham.

4. Traffic flow and congestion (2)

EDF project 1,140 private car, 700 minibus and 700 HGV movements each day. The proposed construction of roundabouts at the NPR junction at Willow Marsh Lane and at the B1122 junction in Yoxford, will cause congestion on this whole section of the A12. Darsham has increased in size by 30% in the last few years. The proposed development of a further 120 houses accessing the A12 near the Westleton Road, an 80-bedroom motel adjacent to the Jet Garage, and the proposed increase in train numbers and level crossing closures will exacerbate this congestion.

5. Level crossing closures

The level crossing is closed overnight for routine maintenance at regular intervals, with traffic diverted down The Street through Darsham village. EDF have chosen to ignore this and not responded to our requests for alternative proposals or mitigation arrangements.

6. Dark skies

Darsham is a dedicated dark sky village and home to the Darsham and Surrounding Villages Astronomical Society (DASH – Astro). EDF propose low level lighting in the NPR, but mandatory Trunk road lighting on the NPR roundabout will destroy this amenity.

7. Rat-running

DPC have expressed concerns about rat- running down The Street during traffic congestion on the A12 or during level crossing closures. EDF say they will install ANPR cameras to detect and subsequently ban HGVs, but have made no proposals to control LGVs and private cars.

8. Noise and pollution

DPC have serious concerns about traffic noise, vibration and pollution* (NOx, CO2 and particulates) as a result of congestion from increased traffic movements from the NPR, HGVs on route to Sizewell, all in addition to existing A12 traffic.

9. Legacy provisions

There are no proposals for pedestrian access to and from Darsham Station and the NPR. Pedestrians will have to walk along the A12. There are no legacy provisions for improved carparking at Darsham Station which was specifically requested by DPC.

10. Geology, drainage and flood risk

New research information has revealed that there could be drainage and flood risk problems associated with the NPR. EDF have proposed a storage basin with overflow to existing watercourses running under the railway. The underlying geology prevents natural drainage within the site and is likely to lead to existing water courses being overwhelmed in heavy rain.

11. Traffic constriction

Likely traffic flows associated with the NPR and direct Sizewell traffic, in addition to existing A12 traffic will lead to serious congestion exacerbated by the construction of two roundabouts, local development and particularly, increased level crossing closures. The resulting noise, vibration, air pollution and rat-running on side roads will seriously erode local residents' quality of life. These concerns have either been ignored or dismissed by EDF and no mitigation measures proposed.

12. Relief road

EDF has consistently refused to consider proposals for a relief road direct to Sizewell from the A12 at Benhall which would minimise the impacts of traffic on the local population, provide a lasting legacy for both the power station and the local area and may well obviate the need for both Park and Rides.

13. Summary

Taken as a whole, Darsham Parish Council conclude that siting the NPR north of Darsham Station on a single carriageway section of the A12 adjacent to a level crossing is a serious mistake. (The Southern Park and Ride is located off a dual carriageway)

*(Research has shown that air pollution caused “horrendous brain, heart and lung ill-health” Gases like nitrogen dioxide and tiny particles, known as particulate matter or PM, can reach deep into the body with the danger of causing lasting damage. EDF have dismissed these concerns).

Darsham Parish Council

(CP & MS)

August 2020.

14 December 2020

info@sizewellc.co.uk

FREEPOST SZC Consultation
EDF Energy Ltd

Dear Sirs,

Sizewell C proposed New Nuclear Development. Stage 5 post DCO submission Consultation

I am writing on behalf of the Suffolk Preservation Society in response to EDF Energy's Stage 5 Consultation on Sizewell C. The Society is disappointed that having prepared and submitted our Statement to Register as an Interested Party to the DCO, within weeks we are asked to comment on a further raft of changes and possible changes to the scheme. For small community groups with limited capacity it is unreasonable that EDF, after 10 years preparing this scheme, is still making significant adjustments after the DCO application has been submitted. Many of the issues to which this consultation relates, including coastal defences and traffic, are matters that have been raised by the community over many years and it is deeply frustrating that they have not been responded to until this very late stage. Having reviewed the submitted alterations to the scheme the SPS wishes to make the following response:

Evolving nature of the proposals

In many respects the nature of some of the proposals is predicated on feasibility studies, modelling assessment and changes resulting from ongoing detailed design work. This places enormous additional demands on stakeholders to constantly play catch up with this evolving process. Furthermore, the public are being asked to comment on a scheme that continues to be far from finalized and is still evolving and without any degree of certainty. This is wholly unsatisfactory as it continues to place unreasonable demands upon stakeholders and is also of limited value as they may yet change further. Therefore, this stage 5 consultation risks taking up further time and effort of small parishes and their residents which in turn may risk engagement fatigue on this most important scheme.

Freight Strategy

The SPS welcomes the efforts which are finally being made to address the significant highway and environmental impacts by increasing sea and rail movements and reducing the number of

anticipated HGV movements across Suffolk's inadequate highway system. However, it is the communities most likely to be impacted by these changes whose views must be given precedence. We also welcome the amendments to the landscape mitigation at the southern park and ride and reduction in land take at the Yoxford roundabout.

The proposed enhancement of the Permanent Beach Landing Facility and options for a temporary Beach Landing Facility are in principle welcomed as a positive approach to address the concerns of the communities and other stakeholders who have sought to minimise HGV movements. However, the proposed changes will see additional negative impacts on the scenic qualities and tranquility of the AONB in the proposed development area as a result of larger structures and increased levels of activity. Sufficient information has not been provided to assess the magnitude of these impacts. The range of scenarios and inadequate level of detailed information heavily impacts upon the effectiveness of this consultation exercise. There has not been an adequate assessment of the impact of additional structures on views further along the coast and without further assessment the SPS is concerned that in a bid to reduce traffic impacts on the highway network the appropriate level of weight to the designated landscape has not been given. In order to minimise the impacts a more detailed assessment of landscape and visual impacts together with embedded mitigation is required.

Landscape and Visual Impacts

The proposals include a significant increase in land take involving hedgerow and tree loss as a result of the recent more detailed design work. We note the assertion that on balance these amendments do not affect the conclusion of the Environmental Statement. Yet we remain concerned that in the case of the Sizewell Link Road there appear to be a total of 50 additional parcels of land that are to be included within the Order while only one area which is to be excluded. The landscape impacts by stealth will continue to erode the landscape value of surrounding villages and we question whether on balance this continued land take should not be comprehensively re-assessed. In summary the modifications to the land take for the link road and two village bypasses in no way responds to the previously stated concerns that the Society has set out in its response to the Stage 3 consultation regarding the associated environmental impacts on the Sizewell link road and the Two Village bypass. SPS continues to be concerned that the routes have been identified without adequate assessment of the impacts on the surrounding landscape and the settings of numerous heritage assets and that insufficient information has been provided to justify the chosen routes.

Relocation of facilities at Sizewell B

The SPS has responded to the planning application (Ref 20/04646) for proposed works to relocate facilities at Sizewell B to accommodate Sizewell C in association with the destruction of

Coronation Wood under separate cover. For the sake of completeness, we reiterate our comments here. SPS acknowledges the recent unsuccessful judicial review of the council's decision to approve the previous application ref: 19/1637/FUL. While we regret the loss of Coronation Wood, we welcome the amendment to EDF's proposals which no longer propose to locate an outage car park on Pill Box Field, but rather to retain it as an undeveloped site and provide additional landscaping to enhance its landscape and biodiversity value. Accordingly, SPS will restrict its comments to the landscape and visual impacts of the current application to develop the former Coronation Wood upon the special qualities of the Suffolk Coast and Heaths AONB.

Having reviewed the documents, the Society is concerned that the loss of Coronation Wood to accommodate the relocated facilities has not been adequately mitigated. Figure 3.2 and 3.4 Development Area Landscape Plan within chapter 3 of the Environmental Statement shows a combination of retained deciduous woodland and hedgerow, proposed woodland edge planting and grass mix on the western boundary, adjoining the Sizewell Marshes SSSI.

The SPS considers that this will be inadequate to screen, soften or provide filtered views of the proposed development. The topography of the site is relevant in this regard as the lowest part of the escarpment to the west of the proposed development area is 5m while the height of Coronation Wood is shown as 10m. The datum levels across the development area varies averages between 7-8 metres. Therefore, it is reasonable to conclude that there will be glimpsed views of the car park as well as the Administrative Building (20m in height) and Training Facility (10m in height) by receptors to the west from Sandy Lane bridleway. Significant landscape scale planting in the form of blocks of additional woodland must therefore be provided,

Furthermore, the extensive illumination of the car park, including reflection off metallic surfaces of the facing materials of the Administrative Building and Training Facility, together with substantial hard landscaped areas of car parking will cumulatively result in a harmful impact upon the special qualities of the AONB. The loss of the evergreen Coronation Wood and replacement by modest levels of deciduous and largely small-scale planting will not adequately mitigate the landscape and visual impacts of the proposed large structures. The SPS considers that this is a serious omission and calls for materially increased levels of planting within the car park and at the boundaries of the western access road in order to soften the industrialising effects in this designated landscape.

Finally, we note that the applicant argues that the proposed landscape planting at Pill Box Field will mitigate for the loss of Coronation Wood (LVIA chapter, para. 7.6.33). However, this is considered to be illogical and the SPS does not accept that the proposed planting to the south of the Sizewell Power Plant can mitigate the loss of screening from the west for the reasons set out above. In conclusion, the SPS calls for a significant increase in planting to both the western edge of the car park, together with planting within the car park to provide filter the views, which will provide enhanced screening as well as biodiversity net gain.

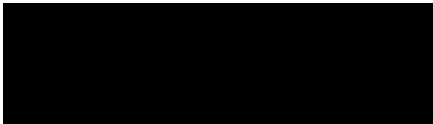
Pakenham Fen

In particular we note the proposed creation of offset mitigation at Pakenham, over 50 miles from Sizewell. We are concerned by these proposals, not only because they do not justify the loss of designated habitat at Sizewell but also that the proposals raise serious issues for the natural and historic environment at Pakenham.

Pakenham is unique in Suffolk in that it enjoys both a wind and watermill. The Pakenham Water Mill is an important surviving mill, listed as of national architectural and historic importance, and is a much-loved Suffolk visitor attraction run by a strong and enthusiastic team of volunteers. The proposed creation of a fen meadow raises multiple concerns, firstly: that changes to the hydrology on the other side of the Mill Stream may have an adverse effect on the existing SSSI meadow. Secondly, it appears that the boundary of the new fenland follows the route of Pakenham stream. This poses questions about any impact this may have upon the flow of the stream and in turn the watermill and how EDF will ensure that there are no negative consequences for the SSSI and watermill at Pakenham. Until full information is provided, this is an aspect of the proposals that the SPS is very concerned by and discussion must be entered into with the parish council as well as the Suffolk Building Preservation Trust who own the watermill.

In conclusion, the latest set of amendments/proposals do not materially address many of the objections raised by the SPS and in some instances raise new issues that we have serious concerns about, accordingly we continue to object.

Yours Faithfully,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director**

Ccs:

MPs: Therese Coffey,

Suffolk County Councillors: Richard Smith, Andrew Reid, James Finch, Russ Rainger, Graham Newman, Steve Wiles, Stuart Bird, Keith Patience, Steve Ardley, Michael Ladd, Jamie Starling, Jenny Ceresa, Craig Rivett, Melanie Vigo di Gallidoro, Caroline Page, Alexander Nicoll, James Reeder, Keith Robinson

Suffolk Coastal District Councillors: Tony Cooper, Ian Pratt, Terry-Jill Haworth-Culf, Maureen Jones, Carol Poulter, Phillip Dunnett, John Fisher, Mark Amoss, Geoff Holdcroft, Patricia Mulcahy, Andy Smith,

Tony Fryatt, Portfolio Holder for Planning, SCDC

Parish Councils: Theberton and Eastbridge, Yoxford, Marlesford, Little Glemham, Farnham with Stratford St Andrew, Leiston cum Sizewell, Wickham Market, Darsham, Blythburgh, Saxmundham, Middleton cum Fordley, Hacheston

Beverley McClean, AONB Partnership

STOPSZC

Clerk, Pakenham Parish Council

Piers Hart, Chair Suffolk Building Preservation Trust

[REDACTED]
Sent: 11/12/2020 10:13:54
To: sizewell@edfconsultation.info
Subject: Sizewell C
Body:

I support the recent improvements to the transport arrangements for the above proposal.
Yours

Sent from my iPhone

Blake Gorst
[REDACTED]
[REDACTED]
[REDACTED]

Sent: 09/12/2020 20:16:38

To: sizewell@edfconsultation.info

Subject: COMMENTS ON SIZEWELL C PROJECT - PROPOSED CHANGES

Body:

ASSOCIATION

EAST SUFFOLK TRAVEL

www.eastsuffolktravel.org.uk

Dear Sir/Madam,

Book 6.10, Vol.9 , Chapters 1-12
Reference 20025615

As a registered interested party, we welcome the opportunity to comment further on transport aspects of the current Sizewell C proposals, while stressing again that it is not in our remit as a public transport users' association to take a position for or against nuclear power.

It is encouraging that the Applicant has responded to comments made in the previous consultation by investigating how more of the construction traffic can be moved by rail. In principle we support this.

However, we are concerned that the current infrastructure must be improved to enable the freight trains to be accommodated without harming the passenger service. There is an obvious need to find a path for one or more extra trains; but if in addition to this the freight trains are to proceed more slowly, this will have a negative effect on line capacity. We would oppose any reduction in the passenger service as the current hourly service provision represents the minimum level required to serve existing needs and encourage future custom.

For night freight trains, lower speeds and/or continuous welded rail would be welcome in reducing noise, but redoubling of track would give more scope for more of the freight to travel in daytime.

We therefore reiterate our call for extra capacity between Woodbridge and Saxmundham, which should at the very least include a dynamic loop in the Wickham Market area, but ideally redoubling between Woodbridge and Saxmundham or at least between Melton and Saxmundham.

It would be reasonable to expect the Applicant to contribute towards the cost of such work. However, they should not be the only contributor, for the legacy of such infrastructure improvement will also be to make it easier to increase the frequency of passenger trains and to continue some of these along the branch to the town of Leiston, which will benefit from a direct link to Ipswich. This must continue to be a serious option and so the track through the town as far as Sizewell Siding should be retained.

We are pleased to note that the northern Park & Ride at Darsham will still be included in the scheme, even with minor reductions to the Order Limits. The retention of a small part of the site for a permanent station car park should also be one of the legacy benefits of the project.

As with our previous submissions, we are happy to enlarge on any of these comments.

Yours faithfully,

Trevor Garrod
Chairman

First Floor
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Tel: 01473 770055

Email: [REDACTED]

Web: www.ipswichandeastsuffolkccg.nhs.uk

The Sizewell C Project

Planning Inspectorate Reference: EN010012 –

Additional Consultation on proposed changes

Dear Sirs

This representation is composed by on behalf of the Suffolk and North East Essex CCG's Governing bodies and on behalf of Health system partners. It is important to note that the CCG continue to work alongside system partners and Public Sector leaders to ascertain the impact of the development on the wider health economy.

The proposed changes are summarised below and have been considered in relation to the impact upon the wider health economy's ability to provide effective and safe healthcare services during construction of Sizewell C;

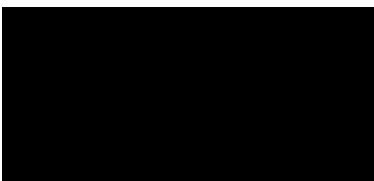
- Increase the frequency of freight train movements to facilitate bulk material imports by rail – *this will be overnight and at weekends*
- Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea. – *potential environmental impact*
- Change to the SSSI crossing design to a single span bridge with embankments
- Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall.
- Change to the sea defence to make the scheme more efficient and resilient to climate change
- Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox field
- Change to certain parameter heights and activities on the main development site to facilitate the construction process.
- Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk.
- Revisions to tree retention on the main development site

- A new bridleway link between Aldhurst farm and Kenton hills
- Extension of the order limits to provide fen meadow habitat at Pakenham as further mitigation for fen meadow loss.
- Extension and reduction of the order limits for works on the main development site and related sites (fen meadow mitigation sites and marsh harrier improvement sites)
- Extension of landscaped bund and other minor changes to the southern park and ride including minor reduction of the order limits
- Minor reductions to the order limits at the northern park and ride
- Extension of the order limits for works on the two village bypass, change to the public right of way around walk barn farm and additional habitat mitigation proposals.
- Extension to and reduction of the order limits for works on Sizewell link Road
- Minor reductions to the order limits for Yoxford Roundabout, the A12/B1119 junction at Saxmundham and the A1094/B1069 south of Knodishall.

Whilst there are concerns relating to the impact on environment and sustainability moving forward with this proposed change to moving construction material for Sizewell C the impact on the overall health system will reduce and therefore the CCG on behalf of the Health System is broadly supportive of the proposed change.

I have already fed back relevant comments via the online survey provided for consultation responses on the Sizewell C website. This written consultation response is in line with comments provided via the online survey.

Yours Faithfully



Senior Estates Development Manager

Ipswich and East Suffolk Clinical Commissioning Group, West Suffolk Clinical Commissioning Group & North East Essex Clinical Commissioning Group

Sent: 02/12/2020 14:53:46
To: sizewell@edfconsultation.info
Subject: FW: Sizewell C
Body:

My objections to Sizewell C remain the same as in my email of 14th September. I recognise the changes that have been proposed but wish to emphasise that to “increase the frequency of freight train movements by rail” and “enhancement of the beach landing facility for new temporary beach landing facility to facilitate imports by sea” is sufficient.

I re-iterate my objections of road use by lorries and state that all material imports be by rail or sea.

Yours faithfully,

Patricia O’Brien
County Councillor Martlesham Division

The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please let me know immediately by using the reply facility in your email software.

This privacy notice <https://www.suffolk.gov.uk/about/privacy-notice/councillors-privacy-notice/> tells you how I collect and use personal data.

Dear Ms Vince,

Thank you for consulting the Forestry Commission with regard to the Sizewell C consultation on proposed changes. I was pleased to see that the loss of conifer plantation in Dunwich Forest will be placed by an equivalent area of native broad-leaved trees in the locality, and the creation of an area of new wet woodland. We therefore have no further comment.

Yours sincerely,

[Redacted]

Neil Jarvis
Local Partnership Advisor
East and East Midlands

[Redacted]

FAO Carly Vince

ONR has examined the proposed changes to the DCO set out in the Consultation Document, and we are satisfied that there are no matters involved that raise concerns regarding the safety or security of either the intended construction site or the operation of the proposed nuclear installation. I confirm therefore that ONR has no comments to make on the proposals

From:easements@sgn.co.uk

Sent:23/11/2020

To:sizewell@edfconsultation.info

Subject:FW: PINS reference number : EN010012 The Sizewell C Project
WL009343km

Dear Sirs,

I am in receipt of your letter dated 16.11.20 regarding the above , copy attached.

The proposed Order does not fall within SGN's area of responsibility . Cadent are responsible for this area.

Kind regards

Kim

Kim Miller

Easement Officer



E: easements@sgn.co.uk

SGN, 2 Leasons Hill Orpington Kent BR5 2TN

sgn.co.uk

Find us on [Facebook](#) and follow us on Twitter: [@SGNgas](#)

Sizewell C – Consultation on Proposed Changes (November - December 2020)

Highways England comments

Introduction

- 1.1 Highways England (HE) is appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).
- 1.2 In respect to the Sizewell C development, Highways England's interest relates to the impact of the proposal on the A14 and A12 trunk roads and their connections with the local road network, ensuring that the SRN can continue to operate safely and efficiently during construction and operation.
- 1.3 Highways England has participated in discussions with EDF's representatives alongside Suffolk County Council, East Suffolk Council and the Suffolk Constabulary regarding transport related matters.
- 1.4 Highways England has provided Relevant Representation in addition to more detailed technical comments in response to the DCO. Comments provided in this note are in response to the Consultation on Proposed Changes (November – December 2020).

Freight Management

- 1.5 A key proposed change is the potential reduction in construction materials being transported by road and an increase in the use of rail and marine modes. Highways England in principle supports the use of more sustainable transport modes during the construction of Sizewell C.
- 1.6 **Table 2.2** indicates that on a 'Typical day', Heavy Goods Vehicle (HGV) movements could reduce from 650 two-way movements to 500 two-way movements, and on the 'Busiest day' the reduction could be from 1,000 to 700 two-way movements. This is reported to represent a mode share reduction from 60% as assumed in the DCO submission to 40%.
- 1.7 It is noted that whilst the scope for increased rail and marine mode share is still subject to more detailed investigations, **Paragraph 3.1.14** indicates that the HGV mode share is unlikely to be reduced below 40% "as this proportion of materials is best suited to road transportation".
- 1.8 **Table 3.1** however suggests rail and marine could carry up to 80% of construction materials. Whilst it is recognised that there are likely to be optimum levels of efficiency for all modes, as indicated under **Paragraph 3.1.15**, further explanation is recommended to justify why the HGV proportion could not therefore be reduced further to 20%.

- 1.9 Confirmation is required on whether there is any change (increase or decrease) in the 'Early Years' as a result of all proposed changes including increasing the size of the stockpile zone (**Paragraph 4.3.10**), which are assumed to be 600 two-way movements.
- 1.10 Clarification is required on whether there could potentially be an impact on the scale and configuration of the Freight Management Facility (FMF). There is no indication as such in the consultation documents, however a reduction in HGV movements would presumably release capacity or increase resilience at the FMF.

Increased frequency of train movements

- 1.11 **Figure 3.1** provides a schematic representation of the existing and proposed/upgraded train lines, sidings and crossover junctions between Ipswich and Sizewell. Clarification is required of the significance of the highlighted blue line which appears to feed into sidings alongside the Great Eastern Main Line, broadly adjacent to the B1075 Ranelagh Road in West Ipswich. Is the blue line intended to show an intended route to and use of the sidings in this location?
- 1.12 Clarification is required of where the additional rail movements may originate from. Will they originate from the local area, or is rail envisaged to be a longer distance mode by transporting construction materials from other regions? Is there expected to be any additional HGV movements at the origin location(s) of freight trains, and whether there is any potential for these to occur within the study area?

From: TheCoalAuthority-Planning@coal.gov.uk

Sent: 23/11/2020

To: sizewell@edfconsultation.info

Subject: ENO10012: Proposed Changes to the Application for a Development Consent Order - Sizewell C Project

Dear Sir / Madam

Thank you for your notification of the 16 November 2020.

I can confirm that further to our letter to the Ms Simone Wilding, Head of Major Casework Management at MHCLG dated 23 July 2020 for the above project (Sizewell C), as the project site is outside the defined coalfield, the Coal Authority has no further comments / observations to make.

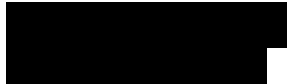
Kind regards

Deb Roberts



Deb Roberts M.Sc. MRTPI

Planning & Development Manager – Planning and Local Authority Liaison



E : planningconsultation@coal.gov.uk

W: gov.uk/government/organisations/the-coal-authority

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Charles Newman

From: Sizewell C <info@sizewellc.co.uk>
Sent: 19 November 2020 16:38
To: Traverse at Adetiq
Cc: sizewellchangeconsultation@traverse.ltd
Subject: FW: Amendments to Application for a Development Consent Order

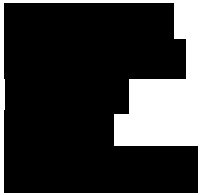
Sent: 19/11/2020 16:31:24
To: sizewell@edfconsultation.info
Subject: Amendments to Application for a Development Consent Order
Body:

My wife and I are aware from the page 48 notice in today's Daily Times (16 11 2020) that a response to the amendments listed therein is invited.

We both fully support the amendments and the proposed development .

With thanks

Sent from my iPhone
Blake Gorst





Julia Pyke
Nuclear Development Director
EDF Energy

(By email only)

18 December 2020

Our reference: DCO/2013/00021

Dear Ms Julia Pyke,

The Sizewell C Project – Consultation on Proposed Changes

Thank you for inviting the Marine Management Organisation (MMO) to participate in *The Sizewell C Project Consultation on Proposed Changes (18 November – 18 December 2020)*, regarding changes to the Sizewell C Development Consent Order (DCO) Application that was submitted to the Planning Inspectorate on 27 May 2020. The MMO notes that this consultation is to allow the public, landowners and other stakeholders to comment on the changes to the Sizewell C (SZC) Project (the Project) prior to NNB Generation Company Limited (SZC Co.) formally proposing the changes to the Planning Inspectorate. It will then be for the Planning Inspectorate to decide if the changes can be made to the Application before it is examined.

This document comprises the MMO's initial comments in respect of the DCO Application changes. Our feedback on the proposed changes can be found in section 2 of this document. However, firstly, the MMO would like to highlight concerns that we share with the Defra Group regarding a lack of detail in the DCO Application, proposed changes documents, and the challenging timescales involved in the DCO application changes. We are concerned about how this may affect the ability of our organisations to provide advice to the Examining Authority as part of the examination process.

This document is without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This is also without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.



1. General Comments

The MMO wish to update you on our stance regarding the application.

On 20th January 2020 the Defra organisations (Environment Agency, Natural England, and MMO) approached the Planning Inspectorate to highlight key areas of environmental risk prior to the application being submitted (please find the meeting note [here](#)).

Since that meeting, it is the view of the MMO and the Defra group that no agreement on a number of key issues has been reached, yet there are further changes being proposed in the “Consultation on Proposed Changes” review. The MMO is concerned that there will not be enough time to give the Examining Authority the best advice due to the large number of updates presented late in the engagement process.

Whilst we welcome the regular contact with SZC Co., through a number of issue specific meetings, we wish to highlight that it will be difficult for the MMO to advise on any new information which is to be formally submitted to the Planning Inspectorate due to very challenging timeframes.

We wish to stress that we are not objecting to the proposed changes to the Project, but merely raising our concerns (which echo those of the Defra group) about substantial workloads with short timescales, which may affect the ability of our organisation to provide robust advice to the Examining Authority.

2. Comments on Proposed Changes

Our comments are divided into sections based on the questions that are posed within ‘The Sizewell C Project Consultation on Proposed Changes Questionnaire’. Please note that we have only included the questions that are relevant to the MMO’s remit. These relate to the changes to the following project elements: Enhancing the permanent Beach Landing Facility (BLF); Adding a second temporary BLF; Adding a temporary surface water outfall; Change to the Hard Coastal Defence Feature; Change to certain parameter heights and activities on the main development site to facilitate the construction process.

2.1 Questionnaire Question 3 - Enhancing the permanent beach landing facility

- 2.1.1 Making the BLF 30 metres (m) longer will extend the dredged area further into the Outer Bar. This will include more capital dredging and likely more maintenance dredging at the Outer Bar. However, the profile for the additional dredged area and the dredging volumes are not sufficiently clear at this stage. Additionally, it is not clear if there is going to be deeper dredging at the Inner Bar to maintain the required flat form on the seabed. This information is required before the MMO can conclude the significance of the impacts from this additional dredging.
- 2.1.2 Due to the additional dredging at the Outer Bar, and the potential use of backhoe dredging to remove sediment from the area, there will be an increased risk that the sediment transport pathway for the Outer Bar will be interrupted without a well-established sediment management plan. The new potential



impacts of backhoe dredging and sediment removal are mentioned, however, details on how the impact of the sediment removal (if undertaken) is to be assessed, are not included.

- 2.1.3 The BLF jetty piles are proposed to cover the Inner Bar, which will lead to a risk of local scour and will interrupt sediment transport along the Inner Bar.
- 2.1.4 The additional horizontal piles, parallel to the coast, will also lead to a risk of scour at the jetty structure. Although the piles may not have an effect on the alongshore transport, there is no detail provided to demonstrate this.
- 2.1.5 There is now proposed to be roughly 100 uses of the BLF per season, which compared to the 30 per season assessed in the original application, will result in a significant increase in the barge and tug effects on the seabed. There is therefore an increased requirement for management of the dredged area.
- 2.1.6 The effect of extending the permanent BLF into the Outer Bar and the management of sedimentation in this area are a key issue, particularly if Option 1 or 2 for the temporary BLF (as discussed below) are pursued.
- 2.1.7 The MMO is not convinced that the extended jetty with grillage will not result in more impacts than previously identified in the DCO application documents. The overall structure of piles plus grillage may become a single scouring element or, alternatively, accretion under the BLF may start to alter the sediment transport patterns. Table 3.7 correctly identifies an increase in the level of impacts on coastal geomorphology and hydrodynamics from the enhanced permanent BLF and recommends further assessment via modelling and scour assessment. An initial assessment of minor impacts (rather than negligible in the previous assessment) is presented. The MMO's view is that this will depend on a reliable management plan to avoid effects on the sediment transport along the outer bar. Consequently, these further assessments and details of a reliable sediment management plan are required for the MMO to be able to agree that the effects of the enhanced permanent BLF will be minor.
- 2.1.8 The MMO welcomes that the modelling proposed will assess the potential for in-combination effects from the permanent and temporary BLFs.
- 2.1.9 As the BLF options are now interacting more directly with the offshore bar, the MMO advise that sediment transport modelling is undertaken using a coupled wave, current morphological change model.
- 2.1.10 The interaction of the enhanced permanent BLF with the new grillage that is proposed requires a similar approach to demonstrate whether it will accumulate sediment, hence interrupting the sediment movement along the inner bar and foreshore. The MMO requires information on how this will be managed. Additionally, the scour assessments at the inner bar should take the grillage into account.



2.1.11 The change of the BLF design to a piled structure, requiring approximately 60 piles, and the increased vessel traffic that will use the enhanced BLF will create additional noise and visual disturbance to protected species in the area, potentially causing displacement from habitat, auditory injury, collision risk, and changes in prey availability. In particular, this could impact the harbour porpoise feature of the Southern North Sea Special Area of Conservation (SAC), and the red throated diver feature of the Outer Thames Estuary Special Protected Area (SPA) which are both sensitive to noise and visual disturbance. This disturbance will be increased by the addition of a temporary BLF, as all options will require piling and will create additional vessel traffic. The MMO defers to Natural England on the impacts of this additional noise and visual disturbance.

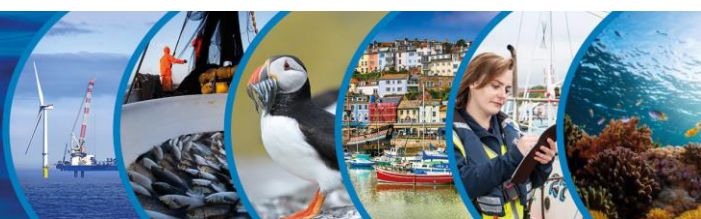
2.2 Questionnaire Question 4 - A new, temporary beach landing facility

- 2.2.1 The addition of a second BLF, in addition to the increase in size of the permanent BLF, will create new habitat loss of supporting habitat in the Outer Thames Estuary SPA that could cause displacement and reduce the foraging success for bird species. The larger the temporary BLF, the more significant the impacts will be. At this stage the MMO is not clear which BLF option will be taken forward, and the exact design and parameters of the temporary BLF have not been provided. In order to conclude that there will be no adverse effect on the site integrity of the Outer Thames Estuary SPA from this additional habitat loss, the MMO needs to be certain beyond reasonable scientific doubt what the impacts of this additional habitat loss will be. Due to the lack of detail on the BLF design, the MMO cannot determine that there will be no adverse effect from this additional habitat loss or other pressures.
- 2.2.2 The addition of a second BLF will also add new visual impacts to the seascape, increase the risk to navigation and further impact the recreational users of the sea in the area. Those risks cannot be fully assessed until further information is provided relating to the final design of the BLF.
- 2.2.3 The MMO would also like to be provided with a diagram of where the BLF options are located in relation to the bar levels.

2.3 Questionnaire Question 5 - New, temporary beach landing facility options

Option 1: lowest capacity

- 2.3.1 The MMO notes that there is no mention of the need to dredge a flat area for barges grounding at the BLF, but this is likely based on the available bed depths of -2m Ordnance Datum Newlyn (ODN).
- 2.3.2 The impacts of Option 1 are the same as the impacts of the enhanced BLF listed above in section 2.1 and summarised below.
- 2.3.3 The BLF jetty piles are proposed to cover the Inner Bar which will lead to a risk of local scour and will interrupt sediment transport along the Inner Bar.



- 2.3.4 The additional horizontal piles parallel to the coast will also lead to a risk of scour at the jetty structure.

The alongshore piles may not have effect on alongshore transport, however, no detail has been provided to demonstrate this.

- 2.3.5 There will be another area of capital dredging and maintenance dredging into the Outer Bar. Backhoe dredging may be used to remove sediment from the area, and this will cause an increased risk that the sediment transport pathway for the Outer Bar will be interrupted and there could be effects on morphology and water quality without an established sediment management plan. This plan should take into account dredging management at the enhanced permanent BLF. The new potential impacts of backhoe dredging and sediment removal are mentioned, however, how the impact of the sediment removal (if undertaken) is to be assessed is not stated.
- 2.3.6 The volumes of capital and maintenance dredging that will be required have not been clearly provided. This information is required before the MMO can conclude on the significance of the impacts from this additional dredging.
- 2.3.7 Table 3.7 correctly identifies an increase in the level of impacts on coastal geomorphology and hydrodynamics from the temporary BLF options and recommends further assessment via modelling and scour assessment. An initial assessment of moderate, significant impacts is presented for Option 1. The MMO's view is that this will depend on a reliable management plan to avoid effects on the sediment transport along the outer bar. Therefore, these further assessments and details of a reliable sediment management plan are required for the MMO to be able to agree that the effects of this BLF option will be moderate.
- 2.3.8 The MMO welcomes that the modelling proposed will assess the potential for in-combination effects from the permanent and temporary BLFs.
- 2.3.9 As the BLF options are now interacting more directly with the offshore bar, the MMO advise that sediment transport modelling is undertaken using a coupled wave, current morphological change model.

Option 2: short pier, low capacity

- 2.3.10 For this option, the barges that use this BLF are proposed to moor over the Outer Bar. The MMO notes that it is unknown whether there will be a need to reprofile the berth area to remove any local high spots. Additionally, the need to monitor and potentially maintain depths will remain, although to a lesser extent than Option 1.
- 2.3.11 The denser piling of the T-shaped end of the pier that is proposed has the potential to cause more blockage effect for sediment transport and to cause combined scour around the structure.



- 2.3.12 The BLF jetty piles are proposed to cover the Inner Bar which will lead to a risk of local scour and will interrupt sediment transport along the Inner Bar.
- 2.3.13 The additional horizontal piles, parallel to the coast, will also lead to a risk of scour at the jetty structure. The alongshore piles may not have effect on the alongshore transport, however no detail has been provided to demonstrate this.
- 2.3.14 There is the potential for some small areas of capital dredging and maintenance dredging at the Outer Bar. Backhoe dredging may be used to remove sediment from the area. This will cause an increased risk that the sediment transport pathway for the Outer Bar will be interrupted and there could be effects on morphology and water quality without an established sediment management plan, however there is less risk of this happening than Option 1. The new potential impacts of backhoe dredging and sediment removal are mentioned, but how the impact of the sediment removal (if undertaken) is to be assessed is not stated.
- 2.3.15 The volumes of capital and maintenance dredging that will be required have not been clearly provided. This information is required before the MMO can conclude on the significance of the impacts from this additional dredging.
- 2.3.16 There is a risk of barges and tugs operating at low water depths over the Outer Bar which could cause vessel induced scour and erosion.
- 2.3.17 Table 3.7 correctly identifies an increase in the level of impacts on coastal geomorphology and hydrodynamics from the temporary BLF options and recommends further assessment via modelling and scour assessment. An initial assessment of moderate, significant impacts is presented for Option 2. The MMO's view is that this will depend on a reliable management plan to avoid effects of the sediment transport along the Outer Bar. Therefore, these further assessments and details of a reliable sediment management plan are required for the MMO to be able to agree that the effects of this BLF option will be moderate.
- 2.3.18 The MMO welcomes that the modelling proposed will assess the potential for in-combination effects from the permanent and temporary BLFs.
- 2.3.19 As the BLF options are now interacting more directly with the offshore bar, the MMO advise that sediment transport modelling is undertaken using a coupled wave, current morphological change model.

Option 3: medium pier, high capacity

- 2.3.20 For this option, the additional, self-elevating platforms and the barges that visit the BLF are proposed to be over the outer face of the Outer Bar. Whether there will be a need to reprofile the barge berth area to remove any local high spots is unknown. A potential to reprofile the bed under the self-elevating platforms is mentioned, however it is not stated if they are anticipated to ground or come



close to it. There may still be a need to monitor and potentially maintain depths for the barge berths or for the platforms (if they ground, although bed levels under the platforms may be self-scouring).

- 2.3.21 The BLF jetty piles are proposed to cover the Inner Bar which will lead to a risk of local scour and will interrupt sediment transport along the Inner Bar.
- 2.3.22 The additional horizontal piles, parallel to the coast, will also lead to a risk of scour at the jetty structure. The alongshore piles may not have effect on alongshore transport, however, no detail has been provided to demonstrate this.
- 2.3.23 There is the potential for some small areas of capital dredging and maintenance dredging at the Outer Bar. Backhoe dredging may be used to remove sediment from the area. This will cause an increased risk that the sediment transport pathway for the Outer Bar will be interrupted and there could be effects on morphology and water quality without an established sediment management plan, however there is less risk of this happening than Option 1. The new potential impacts of backhoe dredging and sediment removal are mentioned, however, how the impact of the sediment removal (if undertaken) is to be assessed is not stated.
- 2.3.24 The volumes of capital and maintenance dredging that will be required have not been clearly provided. This information is required before the MMO can conclude on the significance of the impacts from this additional dredging.
- 2.3.25 There is a risk of scour at the self-elevating platforms, if they ground there could be interruption of the sediment transport pathway along Outer Bar.
- 2.3.26 There is a risk that barges and tugs will operate at low water depths over the Outer Bar due to increased number of vessel operations. This could cause vessel-induced scour and erosion.
- 2.3.27 It should be noted that now the elements of some of the structures are outside the Outer Bar they will be acted on by larger waves and hence have a greater risk of effects on coastal geomorphology and hydrodynamics.
- 2.3.28 Table 3.7 correctly identifies an increase in the level of impacts on coastal geomorphology and hydrodynamics from the temporary BLF options and recommends further assessment via modelling and scour assessment. An initial assessment of moderate, significant impacts is presented for Option 3. The MMO's view is that this will depend on a reliable management plan to avoid effects on the sediment transport along the outer bar. Therefore, these further assessments and details of a reliable sediment management plan are required for the MMO to be able to agree that the effects of this BLF option will be moderate.
- 2.3.29 The MMO welcomes that the modelling proposed will assess the potential for in-combination effects from the permanent and temporary BLFs.



2.3.30 As the BLF options are now interacting more directly with the offshore bar, the MMO advise that sediment transport modelling is undertaken using a coupled wave, current morphological change model.

Option 4: long pier, highest capacity

2.3.31 It is not clear for this option whether there will still be a need to reprofile the bed under the self-elevating platforms which are over the Outer Bar. Whilst the platforms where the barges moor may move with the tide, this may not be necessary for the other platforms. If the platforms are all to move with the tide then the MMO notes there may be a need to monitor and potentially maintain the depths of seabed under the platforms (if they ground).

2.3.32 The BLF jetty piles are proposed to cover the Inner Bar which will lead to a risk of local scour and will interrupt sediment transport along the Inner Bar.

2.3.33 The additional horizontal piles, parallel to the coast, will also lead to a risk of scour at the jetty structure. The alongshore piles may not have effect on the alongshore transport, however no detail has been provided to demonstrate this.

2.3.34 There is the potential for some small areas of capital dredging and maintenance dredging at the Outer Bar. This will cause an increased risk that the sediment transport pathway for the Outer Bar will be interrupted, however, there is less risk of this happening than Option 1.

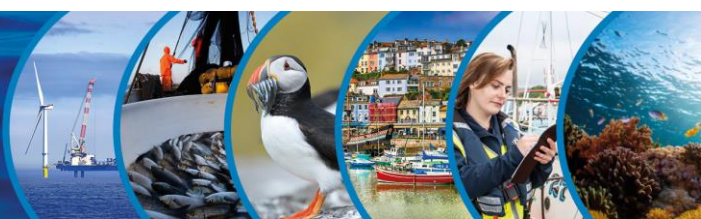
2.3.35 The volumes of capital and maintenance dredging that will be required have not been clearly provided. This information is required before the MMO can conclude on the significance of the impacts from this additional dredging.

2.3.36 There is a risk of scour at the self-elevating platforms, if they ground there could be interruption of the sediment transport pathway along Outer Bar.

2.3.37 There is a risk that barges and tugs will operate at low water depths close to the Outer Bar due to increased number of vessel operations. This could cause vessel-induced scour and erosion, however, there is less risk than from Option 3.

2.3.38 Table 3.7 correctly identifies an increase in the level of impacts on coastal geomorphology and hydrodynamics from the temporary BLF options and recommends further assessment via modelling and scour assessment. An initial assessment of minor impacts is presented for Option 4. The MMO's view is that this will depend on a reliable management plan to avoid effects on the sediment transport along the outer bar. Therefore, these further assessments and details of a reliable sediment management plan are required for MMO to be able to agree that the effects of this BLF option will be minor.

2.3.39 The MMO welcomes that the modelling proposed will assess the potential for in-combination effects from the permanent and temporary BLFs.



2.3.40 As the BLF options are now interacting more directly with the offshore bar the MMO advise that sediment transport modelling is undertaken using a coupled wave, current morphological change model.

2.4 Questionnaire Question 9 - Surface water

- 2.4.1 The MMO agrees with the conclusions that there will be very localised and minor effects on coastal geomorphology and hydrodynamics from the temporary surface water outfall. This is due to the location of the outfall being above the Mean High Water Springs tide, and the proposal for the use of the outfall to be limited to during extreme storm events only.
- 2.4.2 It is identified that there will potentially be erosion on the updrift side of the outfall and accumulation of material on the down drift side. However, this will be limited to the periods when the outfall is inundated (approximately 6-8 tides per spring-neap cycle, 150-200 tides a year), and hence only a small effect is expected. The MMO advises that there will be no likely effect on overall longshore transport from this.
- 2.4.3 Additionally, the MMO agrees that the flow from the outfall is too seldom to cause any long-term effect on littoral drift. When the outfall operates in a storm event there is likely to be some movement of the sediment in the area between the outfall and the sea, but this is likely to be 'smoothed out' by littoral and cross shore sediment movement when the outfall is not discharging.
- 2.4.4 The MMO agrees that no further assessment is required as stated in Table 4.6. However, we advise that there should be some monitoring of the shore around the outfall in its early life to confirm the anticipated lack of significant effect. This monitoring should be included within the Coastal Processes Monitoring and Mitigation Plan.

2.5 Questionnaire Question 10a - Other main site changes, Sea defence

- 2.5.1 The MMO notes that the proposed temporary Hard Coastal Defence Feature (HCDF) is set back from the coastline and at such a level that it is not likely to interact with coastal processes, except at times of very extreme water levels and wave conditions. Should an extreme event occur during the lifetime of the temporary sea defence some sediment redistribution in the area immediately fronting the sheet pile wall may occur. However, the probability of this event is very low. The MMO therefore agrees that it is reasonable to conclude that there is likely to be no effect on morphology from this feature.
- 2.5.2 The MMO notes that the permanent HCDF is now proposed to be higher and will extend closer to the coastline. However, again, at present day conditions it remains set back from the coastline and at such a level that it is not likely to interact with coastal processes except in very extreme conditions. Therefore, the MMO agrees that there will be no changes to the impact assessments included in the original DCO application from these changes.



2.5.3 The MMO highlights that there is uncertainty as to whether the change to the HCDF means that the soft coastal defence feature will be smaller, and therefore active in supplying sediment for a shorter period – this should be clarified. Additionally, the MMO notes that Table 4.6 states that the seaward extension of the HCDF will make it a more effective sediment trap until a new equilibrium is reached. The MMO notes that there will be an increased effect due to these changes, although for a temporary period. It is advisable for this time period to be defined, and the impact assessment updated accordingly.

2.6 Questionnaire Question 10b – Other main site changes, Construction activities and height limits

2.6.1 The MMO agrees that there will be no change to the impact assessments included within the original DCO application from the changes discussed in this section.

MMO Conclusion

There is still significant uncertainty regarding the proposals. In particular, the dredged profile and volumes of capital and maintenance dredging that will be required for the construction and operation of the enhanced BLF and temporary BLF options have not been clearly provided. Additionally, the MMO believes that further modelling and scour assessment should be provided to demonstrate that there will be no significant effects on coastal geomorphology and hydrodynamics from the enhanced and second BLF options. This further assessment should demonstrate how sediment will be managed to avoid effects to sediment transport along the Outer Bar throughout the lifetime of the project. This information is required before the MMO can agree that there will be no significant effects from the enhanced BLF and additional BLF options.

Additionally, there will be a significant increase in noise and visual disturbance to birds and marine mammals and an increase in habitat loss from the addition of a second BLF to facilitate deliveries to the site by vessel, and the use of piling to construct the BLFs. We advise that this will have HRA implications and further assessments are required to demonstrate that there will be no adverse effects on site integrity.

If you require any further information, please do not hesitate to contact me using the details provided below.

Kind regards,

Ellen Mackenzie
Marine Licensing Case Officer

■ ■ ■ ■ ■
■ ■ ■ ■ ■ [@marinemanagement.org.uk](mailto:ellen.mackenzie@marinemanagement.org.uk)



Councillors

Caroline Page
Councillor for Woodbridge



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Date: 18 December 2020

CLlr Caroline Page, County Councillor Woodbridge **Response to SZC Co.'s Consultation on Proposed Changes – my Ref 20025691**

In my responses to past consultations to Sizewell C I have emphasised - in addition to the damage that will be done to the heritage countryside of East Suffolk by the building of this power station - the damage that is inevitable by the diminishing sustainability of EDF's freight proposals.

In the last proposal the delivery of this project was intended to be almost wholly road dependent. It seemed that EDF had discounted the only solution that would cause least environmental impact to the county, in the name of causing less environmental impact. However National Planning policy states that waterborne or rail transport should be preferred to road transport at all stages.

Marine delivery: I therefore welcome the proposal for an additional Beach Landing Facility at Sizewell Beach to bring construction materials in by sea. I am interested to see this is now seen as possible when in the past, marine delivery was speedily discounted with the excuse of damage to marine environment.

However this new plan is not well fleshed out.

It also begs the question, why cannot all or most materials be delivered to the site by this means? It would, for example, be helpful if we knew from where EDF is sourcing the construction materials.

If Sizewell has to be built, it could only be done by eliminating the impact of the scheme on Suffolk's unique and ancient natural environment: minimising, mitigating, or compensating for its destruction is not enough.

The impact on the population has also to be considered along with the countryside.

Rail delivery: The belated mitigation of a road-led strategy by proposals that provide more night trains may help the environment but it will be at the expense of the population who live along the East Suffolk railway line, the residents I represent being among them.

Currently passenger trains operate on the East Suffolk Line between Saxmundham and Ipswich between 0620 and 2250. The current rail proposal is for a night train every hour for the next ten years. We are told that these are likely to be Class 66 locomotives with up to 20 wagons – that is, nearly 350m long, and capable of carrying up to 1,250 tonnes of construction materials. The noise and vibration made by these will be considerable, and it will be a 24 hour issue, as there are hourly passenger services during the day.

Depending on where EDF is sourcing the construction materials, this will impact most heavily on dwellers alongside the track from Ipswich to Saxmundham, and the residents of Woodbridge most particularly. Indeed, as the rail-track in Woodbridge runs alongside the estuary and the town itself is built on land rising from the estuary to the west, the noise of the trains can be heard all over Woodbridge.

The trains being so long and there being several crossings close to Woodbridge Station (both North and South): this will also impact on accessibility by foot and vehicle

My particular concerns are:

- the impact on passenger services generally: the proposed augmentation of services provides no 'recovery time' for any train breakdowns, points failure or timetabling delays or line obstructions such as animal encroachment, fallen trees or human tragedy.
- the impact of both noise and vibration from passing trains on residents' wellbeing and sleep
- the length of south-bound trains at Woodbridge station preventing emergency services access to residential properties and house boats east of the railway line; north-bound trains preventing emergency services access to businesses East of the line such as the Woodbridge boatyard and the Tea Hut, and to riverside organisations such as Woodbridge Boat club and Woodbridge Cruising Club.
- noise and air pollution caused by trains idling at the station

The proposals lack any detail or assessments of the impact on residents or businesses affected – by access, noise, or vibration. and as I have just said, this extends beyond those living close to the track to those within earshot. In Woodbridge alone this is the best part of 10,000 people. The extend of the impact needs to be assessed now and measures must be proposed and costed well in advance, rather than when (if) rail becomes an agreed solution.

Road freight transport This brings us back to the HGVs again. EDF claim by their belated move from an almost wholly road-led strategy it would be possible to reduce the numbers of HGVs on the busiest days from 1,000 to 700, and on a typical day, from 650 to 500 during the building phase. Again - it would help if we knew from where EDF is sourcing the construction materials. And, of course, it would seem HGVs are the default should there be any issue with rail or shipping. For example, if the rail option were progressed (despite all the issues outlined above) it could not come into effect immediately and would not have any impact on reducing traffic during the first two years.

During these years in addition to all other Sizewell C traffic, 650 HGVsd per day would use the A12 and B1122. (And of course, this is before we factor in any Brexit increase or that caused by building the Friston substation).

Sizewell C would therefore still generate a huge number of extra vehicle journeys each day, massively increasing traffic on the A12, the Orwell Bridge and surrounding roads and making rat runs more likely.

As far as Woodbridge is concerned, the northbound A12 becomes an unrestricted single lane carriageway after the Seckford Hall turnoff until just short of the A12/B1069 roundabout. Between that point and just north of the entry of Manor Road onto the A12 the dual carriageway is restricted to 40mph and includes a signal-controlled pedestrian crossing. After this, speed is restricted to 50mph. Even with current traffic levels, queues develop in both directions at peak periods, which leads to ratrunning through Woodbridge town.

EDF assures us that HGV drivers will be sanctioned for using routes off the A12, however they cannot make such provision for unintended consequences: that is, other traffic wishing to escape the queues or intimidated by the HGVS who may turn off the A12 and seek the safety of backroads. Basically, any increase in traffic levels on the A12 northbound and southbound will lead to more frequent, and longer, queues and thus to more regular choice by drivers to divert through Woodbridge. This can only add to Woodbridge's air quality issues (Lime Kiln Quay Road/Thoroughfare traffic light-controlled junction).

Such additional through traffic will adversely impact the town's economy by making it less attractive a shopping centre and tourist centre. It could be mitigated if funding were provided for the provision of the Suffolk County Council approved 20mph zone through Woodbridge along the B1438 and other cross-town roads to reduce the attractiveness of the B1438 for through traffic.

Conclusion The residential outskirts of Woodbridge are built beside, and locally traversed by, the A12, beside which is sited the large Farlingaye High School (2000 plus students) with a catchment area of about 400 sq miles. The playing and recreation field abuts the A12 Air quality is a specific issue in young peoples' health. Increased traffic would worsen the situation.

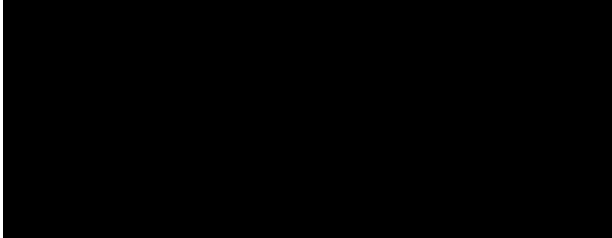
Residential properties lie both sides of the A12 between the A12/B1069 roundabout and the A12 junction with Manor Road to the north.

The eastern part of Woodbridge is defined by the B1438 – which is where traffic escapes queues - which runs from a roundabout junction with the A12 southwest of Woodbridge (with a significant amount of sheltered and old persons housing build on both sides. Air quality is also a specific issue with older people's health. Increased traffic would worsen the situation.) It continues via the commercial centre of Woodbridge, continuing (as 'the Old Yarmouth Road") through Melton, Ufford and Wickham Market before returning to the A12 just north of the proposed Southern Park and Ride, north of Wickham Market.

The East Suffolk railway line traverses the eastern part of the town and its centre. Both the B1438 and railway pass through the residential and conservation area of Woodbridge over extended lengths. The railway forms the boundary to the Deben Estuary AONB

In short, Woodbridge, squeezed as it is between the A12 at the top of the town and the railway at the bottom and with the B1438 running through is between a rock and two hard places when any form of delivery, excepting marine delivery is proposed for the construction and running of Sizewell C.

Both road and rail use impacts heavily on the town – the only option that will not is a marine option.



Caroline Page
Woodbridge County Councillor

Aldringham-cum-Thorpe Parish Council Response to Sizewell C 5th Consultation

Introduction

Our Parish includes three important business locations - a large caravan Site (Beach View Holiday Park), Sizewell Hall and The Warden's Trust, all very close to the proposed site and yet our Parish has been consistently overlooked as a Consultee. In our response to your Stage 3 proposals dated March 2019 this Council expressed concern over EDF Energy's commitment to the long-term benefits to our community after the construction of two new nuclear reactors to the north end of our Parish Boundaries. We begged the question of how this massive construction could enhance the quality of life of our residents without overwhelming our limited resources during the lengthy construction period. We have yet to see any indication of a long-term benefit, legacy or sustainability that we require. We felt at the time, and still do, that EDF Energy are doing the bare minimum required to meet the statutory obligations required for the construction and operation of these reactors. Now, eight years into the consultation, an additional consultation phase is required to analyse a new set of proposals post DCO submission. Some of these proposals are distinctly lacking in detail or viability assessment and yet we are expected to offer an opinion.

Environmental Impact

Our previous response expressed concern over the environmental impacts of the site on the Suffolk Coast AONB, the Sizewell marshes SSSI and the RSPB reserve at Minsmere. Some activity has taken place to create new fen meadow habitats at three sites in the county, but a lot more time is required for these sites to develop enough to mitigate the loss of the habitats within the SSSI. The Suffolk Wildlife Trust has written that EDF Energy's current plans were 'not even close' to meeting the habitat replacement requirement. RSPB Minsmere maintained in a recent video that construction of Sizewell C would be 'catastrophic for wildlife' and 'does not believe that Sizewell is a suitable location for a new nuclear power station'. They have yet to be appeased by EDF's words in claiming to work with them 'as a valued neighbour'. At all times, wildlife and habitat will be under threat from noise, light and dust pollution. We worry also about the nature of Sizewell's sea defences and the effects of rising sea levels. The permanent nature of the structures, up to fifteen metres high and eight metres nearer the shoreline, could disrupt the coastal process at both ends of the site. This autumn has seen dramatic cliff collapses to the northern end of Thorpeness, far more than expected, and could be further at threat. It is vital that any construction activity does not add to this significant risk.

Transport

At previous consultations EDF have been heavily criticized for a too-heavy reliance on a road led strategy for movement of materials and personnel throughout the construction phase of the project. They had appeared to pay only 'lip-service' to using other means, namely rail and sea. However, they have now decided to propose some alternatives. The sea route entails a temporary Beach Landing Facility which could be used day and night moving aggregates ashore, although the long-term effects on the extremely unstable coastline to the south around Thorpeness do not seem to have been closely examined. This, along with the proposal to introduce a working rail route would make a serious dent in the HGV numbers on any given day. However, 700 lorry movements daily still equate to one every 2 minutes throughout a 24-hour period. Their proposal for eight daily train movements is welcome, even though these are mostly at night. Perhaps a legacy move on this could be a permanent rail station at Leiston. There is no escaping the fact there will be a massive increase on traffic loads in the existing road network, especially in the early years before the by-passes and park and ride schemes are operational. We feel that the Sizewell link road should be taken up at the scheme's conclusion and the land returned to its former uses. At present, EDF admits that these changes are not guaranteed, but for a smoother and less chaotic construction process this council feels that they must be implemented.

People and Economy

There will, of course, be great employment opportunities for this area in both the construction and the operational phases of Sizewell C. EDF claim that during the course of construction 25,000 job opportunities will be created and 1,500 apprenticeships provided, hopefully coming in the large part from the local area. 900 further permanent local jobs will be created for the reactor's operation. However, as the 'local' area is defined as anywhere within a 90 mile drive, this might attract more commuter traffic and be less beneficial to the immediate area than first appears.

A large number of the construction workforce will be transferred from the Hinckley site and will be housed in the accommodation campus at Eastbridge. This council opposes this move and has, at the Stage 3 consultation, supported the D2 proposal roadlink, tied into much greater use of the old Leiston airfield site, to create a more integrated approach combining the accommodation campuses, park and ride facilities and temporary construction areas. This would reduce the impact on the AONB and provide a great legacy opportunity for satellite industrial units etc. An improved rail link could facilitate a future technology park, recalling Leiston's historic industrial past.

Conclusion

Whatever changes EDF Energy may make to this scheme there is no getting away from the questionable nature of Nuclear Power as a future clean resource. We are still decommissioning Sizewell A, at great cost, with many more years to go before completion. The advances in renewable energy over the last decade have been enormous, and by the time that Sizewell C is operational it could well be superfluous. A fraction of the £20 billion that this project will cost, if used for nationwide insulation installation, will give immediate and lasting results to reduce our carbon footprint. It is estimated that the carbon footprint in building this reactor will not be recouped until at least 2040. Furthermore, the Nuclear Decommissioning Authority has recently reported that cleaning up after the reactors we already have, never mind what we may have in the future, will cost £132 billion over the next 120 years – a sad legacy for our grandchildren and their children's children.

This area will soon be 'blanketed' by an array of wind farms which will be using proven technology at an ever-decreasing cost. We note that both of EDF's EPRs have been beset with design and technical problems with huge overruns of costs and time.

There is little doubt that this scheme is a massive incursion into the lives of the people in this area, and a massive strain on our already stretched infrastructure. The construction duration, between nine and twelve years, will be a lot to bear for us all and will cause untold damage to our AONB and our quality of life, which EDF are promising to restore and improve but have yet to provide a realistic view of how this will be achieved. The upside of this project is that at the end of it there will be a facility that will produce low carbon electricity for sixty years and nine hundred permanent well paid jobs created in an area where they are much needed. EDF Energy have made eleven updated pledges to 'minimise disruption and enhance the opportunities for Suffolk from Sizewell C' of which they must be held accountable. Throughout the consultation phases EDF have had to be dragged 'kicking and screaming' to a point where perhaps the advantages of this development now have the potential to outweigh its disadvantages, assuming that EDF choose to implement the most environmentally friendly options and not the most cost-effective options. They have a long way to go to prove that they will be the beneficent partner to our area that they claim. Whilst we cautiously welcome some of these proposed changes the lack of supporting documentation falls short of providing a realistic option for us to review against our substantial concerns.



WOODBIDGE TOWN COUNCIL

Shire Hall Market Hill WOODBRIDGE Suffolk IP12 4LP

(Locum) Town Clerk: Mr Greg Diaper



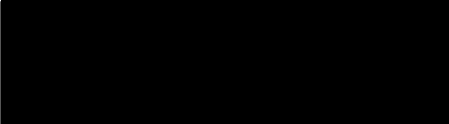
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Re - Consultation on proposed changes to DCO – Response from Woodbridge Town Council.

Please find enclosed the response from Woodbridge Town Council to the Consultation on proposed changes to Development Consent Order for Sizewell C.

The response included in this envelope should be considered as the response from Woodbridge Town Council. Earlier today (Tuesday 15th December) a version was posted to you which incorrectly contained a second paragraph in the 'Southern Park and Ride' section, and as such should be disregarded.

Yours sincerely


Mr G E Diaper
Locum Town Clerk
Woodbridge Town Council

Enc. – The Sizewell C Project – Consultation on Proposed Changes November – December 2020.

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The Sizewell C Project - Consultation on Proposed Changes November – December 2020

Response of Woodbridge Town Council

Executive Summary

Woodbridge Town Council ('WTC') have examined the consultation document and its response is in headed sections below.

WTC in its response does not advocate the adoption of any of the proposed changes presented in the consultation as it considers the detail provided is inadequate. There is no indication of proposed mitigation by NNB Generation Company (SZC) Ltd ('SZC Co') for the adverse impact of changes and revised detailed environmental impact, noise and other assessments is not provided.

WTC will present its detailed view of any changes that SZC Co presents to the Examining Authority ('ExA') for the Development Consent Order ('DCO') as, and when, ExA has deemed such changes, along with supporting documentation, are acceptable to be included in the examination of the current DCO Application.

WTC in this response indicates proposed changes it deems inappropriate. It presents potential appropriate mitigation and compensatory benefit for each of the proposed changes should they form part of changes presented for DCO examination. These are based on what WTC considers are the potential impacts of the proposed changes upon individuals and/or the environment within, and adjacent to, the boundaries of the town. Brief discussion is given to certain other proposed changes where adverse impact may occur to individuals using public access facilities.

Detailed Response

Freight Management Strategy

Woodbridge centre lies to the immediate east of the A12 route designated for HGV road transport for both Sizewell C and the East Anglia Two project. The residential outskirts of Woodbridge are however beside, and locally traversed by, the A12. Residential properties lie both sides of the A12 between the A12/B1069 roundabout and the A12 junction with Manor Road to the north.

The eastern part of central Woodbridge is traversed by the B1438 which runs from a roundabout junction with the A12 southwest of Woodbridge via the centre of Woodbridge, Melton, Ufford and Wickham Market before returning to the A12 just north of the proposed Southern Park and Ride, north of Wickham Market. This road also has a junction with the A1152 in Melton.

The East Suffolk railway line traverses the eastern part of the town and its centre. Both the B1438 and railway pass through the residential and conservation area of Woodbridge over extended lengths. The railway forms the boundary to the Deben Estuary AONB.

Woodbridge will thus be impacted by road and rail freight transport to and from the Sizewell C, the preparatory work for such use and further use until the complete decommissioning of the plant.

Road freight transport

The A12 up to the roundabout junction of the A12/B1438 is unrestricted dual carriageway but between that junction and the A12/B1069 roundabout becomes an unrestricted single lane carriageway after the Seckford Hall turnoff until just short of the A12/B1069 roundabout. Between that point and just north of the entry of Manor Road onto the A12 the dual carriageway is restricted to 40mph and includes a signal-controlled pedestrian crossing. Thereafter to the A12/A1152 roundabout the dual carriageway is restricted to 50mph.

WTC has concerns about the increase in HGV along the A12 with the Freight Transport road transport change in the consultation as, whilst the number of HGV's is reduced over the DCO application proposal, even with current traffic levels queues develop at peak periods.

Northbound this occurs back from the A12/B1069 roundabout and/or the end of the dual carriageway at the Seckford Hall turnoff southwest of the A12/B1438 junction. The queues often extend west of the A12/B1438 junction. When these queues form the dedicated right turn lane onto the B1438 remains clear leading to traffic diverting through Woodbridge on the B1438.

Southbound this occurs back from the A12/B1069 roundabout towards the A12/A1152 roundabout. Queuing leads to drivers seeking alternative routes to the A12 further south/north by diversion through Woodbridge, principally along the A1152/B1438 but also via other roads such as Bredfield and Pytches Road to avoid the A1152/B1438 junction.

Whilst we recognise that HGV vehicles will be monitored by GPS tracking and will be sanctioned for using routes off the A12, any increase in traffic levels on the A12 northbound and southbound will lead to more frequent, and longer, queues and more regular diversion of traffic through Woodbridge. This will inevitably include non-HGV Sizewell C traffic which is currently not proposed to be monitored, as well as vehicles that already divert to avoid these queues. The additional non-HGV SZC traffic will only add to the issues of exceedance of air pollution levels which exist at the Lime Kiln Quay Road/Thoroughfare traffic light-controlled junction. It will also adversely impact the use of Woodbridge as a shopping centre and tourist attraction thereby affecting the economy of the town.

WTC also note neither the DCO application nor the consultation give any indication of the traffic management strategy for HGV vehicles already on the A12 if blockage of the A12 occurs between A12/B1438 roundabout and the turn off to the southern Park & Ride at the B1116/A12 grade separated junction. Whilst we appreciate that any HGV traffic at the Levington Lorry Park will remain there, and HGV not yet on the A12 will be directed to it, there will be HGVs on route.

WTC consider that SZC Co, for any freight transport option selected for the DCO application, should provide mitigation works to prevent, and reduce, the use of the B1438 and other cross-town roads by non-HGV Sizewell C traffic.

The mitigation options we wish SZC Co to adopt and/or fund are as follows:

- Mandatory GPS tracking of all non-HGV Sizewell C related vehicles, including staff private vehicles, combined with the same sanctions as for HGV traffic
- Restriction of all non-HGV Sizewell C related vehicles to travel along the A12 north of the A12/A1214 roundabout at Martlesham

- If the A12 is blocked between the A12/A1438 roundabout and A1116/A12 grade separated junction, the use of the A1438 for diversion, which may be indicated by Police the permitted route for Sizewell C traffic will not alter. Signage or direct instructions to all HGV operators and to non HGV Sizewell C traffic should direct them to return to the Levington Lorry park or for non HGV Sizewell C drivers to other facilities or their local depot either at, or south or west of Martlesham. Such facilities could include the Martlesham Park & Ride.
- Assist funding for signage and road calming for the Suffolk County Council approved 20mph zone through Woodbridge along the B1438 and other cross-town roads to reduce the attractiveness of the B1438 for through traffic.

Whilst these measures would provide partial mitigation WTC consider that there will be residual impact by non Sizewell C traffic increasing using the B1438 to avoid slow traffic on the A12 over the long period of Sizewell C use of the local highway network for construction. We thus seek the following compensatory benefits:

- Improved footpaths along the A12/B1438 with accompanying cycle lanes into Woodbridge

Finally, in response to our questions on the road transport aspects of the freight management you have indicated that you are considering the potential to use larger capacity, 28.5 tonne, HGV vehicles. WTC would look favourably on the use of these larger capacity vehicles to reduce the number of HGV vehicle movements along the A12.

Rail Freight transport

The East Suffolk Line traverses Woodbridge with numerous level crossings and has a restricted speed limit of 15mph through much of the town. Line control signals are located at Woodbridge station for both northbound and southbound trains. For northbound trains these hold trains at Woodbridge station until the line is clear of all other traffic up to Saxmundham. For southbound trains these signals hold trains if there is a train delay or line obstruction between Woodbridge and Westerfield junction.

Two of the level crossings in Woodbridge, namely the vehicular crossing to Everson's boat yard from the Avenue and the pedestrian crossing to the south of Kingston Fields Recreation Ground, do not have automatic gates, light and sound-based warning systems.

Three other vehicle/pedestrian crossings lie immediately north of Woodbridge station. Whilst controlled by automatic gates, lights and sound warnings they provide the only vehicular access into the residential housing and house boats to the river side of the crossings. There is also no vehicular link between these crossings east of the railway. Tidal flood gates exist east of the railway at each of these crossings. The proposed 339m long freight trains, if halted at Woodbridge station line signals, will block all three crossings.

Residential housing is near to the line, some of which is historic with single glazing. Many of the properties are occupied by elderly residents. One property at Woodbridge station, the former station house is a guesthouse/B&B.

Passenger trains operate on the East Suffolk Line between Saxmundham and Ipswich between 0620 and 2250, the latter being the last Lowestoft bound train which can be delayed awaiting any late running 2100 train out of Liverpool Street.

WTC has concerns about any of the rail freight options utilising night-time operation due to

- the impact on residents/guests sleep and mental well-being of train klaxons over a substantive residential area east of the B1438
- the impact of noise and/or vibration from passing trains on residents/guests sleep, general health and mental well-being
- the further impact of air pollution and risks associated with possible delayed freight trains idling at the line signals located at Woodbridge station. Idling Lowestoft bound trains impacting severely on guests at the Station Guesthouse, residential properties either side of the level crossing to the quay and house boats.
- Ipswich bound trains preventing emergency services access to residential properties and house boats east of the railway line.
- The impact on passenger services as the proposed change provides minimal resilience for any train breakdowns, timetabling delays or line obstructions e.g. tree falls.

WTC remains strongly opposed to any night-time train operation and seek SZC Co adopt measures to allow the use of daytime freight trains whilst not impacting on passenger services. We concur with Melton Parish Council on the need for SZC co to adopt dualling of the East Suffolk Line south of Campsea Ashe (Wickham Market) station to the dual track south of Lime Kiln Quay to allow trains to pass along this stretch of railway, rather than the simpler but we understand little cheaper, passing loop, as proposed in its Consultation 3. Whilst SZC Co has made effort to remove night-time rail traffic through Leiston it is failing to similarly do so for other town and villages along the line.

If SZC Co continue to include night-time freight train operation in its DCO application, and any change involving additional night-time trains, WTC seek adoption of the following mitigation by SZC Co as a minimum:

- the installation of audible and light alarms at the two level crossing without these features so as to avoid freight trains using klaxons on the approach to these level crossings
- pre enabling works independent expert background night-time noise, vibration and a structural condition survey for each and every residential property and the Station guesthouse; background night-time noise surveys for each and every houseboat and a structural condition survey for each and every other property within a suitably agreed bound as determined by an independent expert.
- consideration of the rural town nature of the area traversed by the railway and the need for lower dB trigger level for mitigation than in a major urban setting
- pre Sizewell C freight train use enabling works to include but not limited
 - a) noise reduction glazing of residential and guesthouse properties,
 - b) continuous welded rail track with ballast mats and elastomeric base plate pads

These works should be planned for daytime line possessions, and as with some continental railways e.g. between 1030 and 1700 so as to minimise impact on both residents and commuting rail traffic.

- installation of new track side signals for freight trains 350m south of Woodbridge Station to prevent any idling at Woodbridge station and any southbound delayed train blocking emergency vehicle access to residential properties east of the railway line
- bridge/culvert strengthening works as necessary on the East Suffolk line such that post Sizewell C construction delays are not occasioned by accelerated degradation of these features by Sizewell C freight train traffic. Consultation 3 indicated there were such structures present.

Notwithstanding these mitigation measures for any night-time freight train option in the DCO application to be presented to the EXa, WTC along with Melton Parish Council consider it essential with an increase of night-time trains to 4, possibly 5 per day that dualling of the East Suffolk Line is built to provide resilience whether between Saxmundham and Melton or Campsea Ashe (Wickham Market) station and the existing dual track south of Lime Kiln Quay crossing.

Beach Landing Facility ('BLF')

WTC have noted the various proposed change options to the BLF. Enhancement of the BLF has previously been discounted by SZC Co due to their adverse impact on coastal processes and the local environment.

Whilst these proposed changes may reduce the impact on Woodbridge of HGV road transport to Sizewell C it is apparent from Table 3.7 that considerable further assessment of the impact of these changes remains to be completed. The proposed changes may globally impact the Suffolk Coast and as such WTC do not wish to further comment upon these changes until a better understanding of the impact is known.

Main Development Site

Sea Defences

WTC has expressed concerns in its Relevant Representation on the impact of the sea defences on the Suffolk Coast and its use by Suffolk residents. WTC notes the intention in the proposed change to substantially raise the Hard Coastal Defence ('HCD') during the operational phase to more fully account for projected climate change.

WTC further notes from comparing Figure 4.5 and Figure 4.19 in the Consultation document that SZC Co propose to place a temporary sea defence sheet pile wall seaward of the line of the Hard HCD. Whilst recognising the figures are diagrammatic, the top of the wall is stated in the text as 7.3m OD. There will be a significant level difference to the beach in front, as shown in Figure 4.19, where the coastal path will be diverted to. WTC believe this may place users of the coastal path at risk during any combined spring tide/storm surge event as a sheet pile wall provides no option for refuge unlike a sloped revetment.

Associated Development

Southern Park and Ride

WTC notes the proposed landscaping changes to the Southern Park and Ride and leave comment on those changes to the immediately adjacent parishes. However, WTC are concerned that with the Southern Park and Ride's current location if monitoring of non-HGV traffic is not adopted as a proposal in the DCO application. Any significant delay at the A12/A1438 roundabout will inevitably lead to such traffic using the B1438 through Woodbridge to access the southern Park and Ride facility north of Wickham Market.

Remaining Proposals

WTC does not wish to comment on other Main Development Site and Associated Development Changes. WTC consider these are matters for the local parishes to comment upon.

SZC DCO Stage consultation December 2020

Representation from Leiston-cum-Sizewell Town Council

Councillors have viewed the documentation and diagrams accompanying this latest consultation and would make the following comments;

Overall, the ambition to reduce the number of HGV movements is admirable and supported.

The rail option is an obvious choice if Network Rail can accommodate the increase in train loads although, the increase in inconvenience to neighbours of the East Suffolk Line, would need to be fully assessed. It was noted that this increase would be once the Green Route was in and that there would still be no movements at night to the LEEEI even if some loads continued to be delivered there after the “early years”. It was unclear however just how a train would be parked up overnight for the LEEEI but still allow the other, new, movements past it. We will need clarity on this.

To reduce HGV’s further, various options for a Temporary Beach Landing Facility were presented. Operations of the permanent BLF during the summer “campaign” period will block the coastal path a lot and, with the vagaries of tide and weather, could mean a substantial loss of amenity during the holiday season. Separate from this the first two temporary options now being consulted on look as though they will operate in a similar fashion to the permanent BLF but, along with Option 3 and 4, look as though they will cause less disruption/closure of the coast path by using an overhead conveyor. The worries of members is the effect on the bars caused by the piers and the plough dredging of the later options and the long term effects on coastal process and marine ecology. This will be looked at closer when SZC decides on an option (if any). I am sure lighting for night operations would be regulated by the maritime requirements.

An aside to this is that, when the coastal path is closed, clear and accurate signage is displayed at the Sizewell Gap entrance for walkers arriving by car to see, should they wish to go elsewhere. This should be linked to site operations electronically and accurately updated to prevent frustration.

Bottom line with all the above options though is that they are not being put forward as definite and still have some work to be done. Even if all of them come to fruition SZC Co. will rely heavily on the Link Road and it is **essential** that this is in place for the construction and beyond as early as possible, preferably in the first element of “early years”.

The next item we would like to comment upon is the raising in height (and presumably the footprint) of the sea defences. Members cannot comment on this as they need a visual representation of how this new change would look against SZB defences (for comparison) and an aerial mapped view to see how far they would now encroach onto the frontage and foreshore. It was very tight before and this will exacerbate it. The relevant information has been requested. There is still concern about how walkers will be “directed” past all the above works to get to minsmere. We

have mentioned before that the fencing used during SZB construction is an unacceptable solution and we would be looking to establish this in any SoCG.

The change to the causeway is welcomed.

We are seeking to see where the marine outfall is to be situated and whether it is being trenched in or done by direct drilling. It is suspected that this will be done by the former which would damage another section of the dunes. This needs to be installed with minimal disruption to the surface fauna. An aerial depiction of siting is requested please.

The new bridleway crossing of Lovers Lane to meet Kenton Hills and Bridleway 19 is welcome. It is hoped that this can be achieved during the construction once the early years traffic has decreased from Lovers Lane and not after construction.

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16 DEC 2020

PAKENHAM PARISH COUNCIL

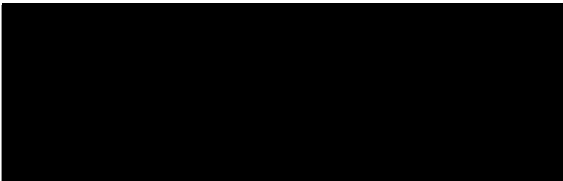
**Clerk to the Council
Mrs Sandra Brown**



7th December 2020

Sizewell C consultation – Pakenham Parish Council's comments in relation to the possible purchase of land re Fen Meadows, Pakenham

If EDF Power Station at Sizewell C does go ahead and the land at Pakenham is obtained the Parish Council would like these questions answered to inform the residents of Pakenham:

- I. What is the proposed timescale for this (start to finish)?
 - II. Who will ultimately own the land and will this organisation be legally separate from EDF and a charity?
 - III. Will a member of Pakenham Parish Council be invited to sit on the board of Charity as a representative of the village?
 - IV. Will this land be open to access by the general public in perpetuity?
 - V. Currently footpath no.3 runs through this area, will this footpath be retained and raised on duck boards.
 - VI. Will there be further footpaths created across the new Fenland, if so, where would the access be and will these footpaths be raised on duckboards.
 - VII. Will there be an opportunity for Pakenham Parish Council to agree the location of new footpaths?
 - VIII. Does this Plan have the approval of Natural England who are Guardians of the existing SSSI meadow?
 - IX. Will any changes to the Land Hydrology on the other side of the Mill Stream have any adverse effect on the existing SSSI meadow?
 - X. It appears that the boundary of the new Fenland follows the route of Pakenham stream, how will this impact on the flow of the stream and in turn the listed Pakenham Water Mill.
 - XI. How will the organisation managing the new Fenland maintain the stream?
 - XII. Pakenham Parish Council are concerned about the about the affect on the stream, has this been modelled and studied in depth to avoid any problems in the future with the operation of the Water Mill.
 - XIII. Will this proposal have an impact beyond the immediate area and have an effect on the wider area including water levels. How will this be monitored and controlled, will there be any effect on homes and gardens.
 - XIV. Pakenham Parish Council would like to be included as an interested party on future discussions for this site.
- 

Sandra Brown, Parish Clerk
On behalf of Pakenham Parish Council

Sizewell C: a further public consultation by EDF 18 November to 18 December 2020

EDF Fourth Consultation: additional transport and coastal proposals.

Response from the Alde and Ore Association.

The Alde and Ore Association is a charity, with some 2000 members, which aims to preserve and protect the Alde and Ore Estuary for the benefit of the public to enjoy.

The Association addresses only the proposed structural changes affecting the coast line.

Summary: Nothing in these latest proposals allays the Association's basic concern that the long term existence of Sizewell C will interrupt natural coastal processes and lead to damaging the coast further south, including to the detriment of Aldeburgh and the long natural Orfordness shingle spit protecting the Estuary. If anything they add to the concerns.

Detail:

The proposals involve extending the proposed Beach Landing Facility, a new temporary beach landing facility, for which four options are given, changes to the Hard Core Defence Feature which will defend the two SZC plants from the sea and flooding and new plans for a temporary storm water outfall on the beach. These plans have consequences for the earlier proposals envisaged for shoreline protection by shingle recycling.

These proposals are not an appropriate basis for a real consultation. The consultation document admits that they involve new ideas on which there is further work to be done to assess whether or not the impact on coastal processes and sediment movements will have significant effects. The statement in the document that despite further work being needed, the impact of the proposals will be insignificant cannot be sustainable as there is no evidence offered as to why that is the case.

The Hard Core Defence Feature: The design of the Hard Core Defence Feature was incomplete in the last consultation, so assessment of its impact on coastal processes was not possible. Adjustments have been made to that proposal making it apparently 3.8m higher and extending a further 8 metres seaward, but the small-scale diagrams do not make clearer what the design may be. Sheet piled walls have only a limited life but the whole structure will be in place for over 100 years. The structure will be more intrusive into the rapidly shifting coastline and the document acknowledges that will require more shingle recycling at an earlier date - that point again itself showing that there will be an even more significant impact on the coast than the impact of the earlier consultation proposals on the coast.

The Permanent Beach Landing Facility would be extended by 30 metres and would be used for major exceptional deliveries. The impact of this is not clear but may be less than that for the HCDF.

The Temporary Beach Landing Facility proposal provides for four options but even those are still liable to change: for example Option 4 - if it were to be essentially a floating platform it would have less impact on the sea bed despite its size, but if, as could still happen, it was decided to make it fixed installation, given its size the impact on coastal flows could be serious. This cannot be a proper consultation as the questions asked are requiring answers to a moving target.

Temporary Storm Water Outfall This is a new addition. The proposals are inadequate in that the actual placing on the beach is uncertain, as are the considerations as to its impact on the beach profile and possible problems for walkers.

Need for remedial action on the shoreline adjacent to the power plant. The fact that the consultation document accepts that the new proposals would require earlier **remedial action** to deal with erosion and long shore drift than under the previous plan, probably by 2050, is welcome but that is where that recognition ends.

The real point is the potential impact. The consultation does little to attempt to clarify that and so is inadequate. It can be inferred that the earlier date of the structure starting to protrude from the coastline could mean earlier and more build-up of sediment north of Sizewell. The plans remain silent on what happens to the south: the original proposals made the sweeping assumption that coastal processes within the Greater Sizewell Bay will stay within that area and that there will not be any implications to the south, still remains to be demonstrated with evidence. This assertion remains strange given the long evolution of the dynamic Suffolk coast, even from Dunwich to Shingle Street, and the fact that the ness of Thorpeness itself, at the southern end of the Sizewell Bay, has moved south in recent years. There is nothing in any of the proposals to date, including this latest fourth round, which gives any confidence that there has been any proper consideration of the potential damage to this dynamic coastline arising from the disturbance that will be caused by the construction of Sizewell C and which could have substantial adverse consequences for the shoreline of the settlements and Orfordness to the south of the Sizewell area.

One further consideration to be drawn from these shifting proposals is that **the need for a future monitoring and mitigation plan has been emphasised, yet again.** The existence of such a plan, if Sizewell is allowed to be built, will be vital to ensure changes to the coast caused by the existence of SZC, as opposed to natural coastal evolution, are addressed and mitigation put in place. The need for a legally binding, well governed structure which will be properly funded is firmly re-emphasised here. It is fundamental that such effective arrangements are in place for the entire life of the project, including the eventual decommissioning and removal phases.

Conclusion: The lack of transparency about what is planned, when the impact could be detrimental to our coast, was and remains unacceptable. A consultation on which it is not possible to form a view but only to express concerns is not a real consultation.

From the Alde and Ore Association Trustees

18 Dec 2020

•email comments to info@sizewellc.co.uk;

[REDACTED]
Sent: 18/12/2020

To: sizewell@edfconsultation.info
[REDACTED]
[REDACTED]

**Subject: Yoxford Parish Council Response to Sizewell C Project
Consultation December 2020
Freight Transport**

The people of East Suffolk do not want lots of HGVs on the local roads because the resulting congestion and increased journey times will damage other businesses (especially tourism), will impact on the quality of life for local people and will have a negative impact on the environment and air quality. It is therefore pleasing that there are proposals for increasing the use of rail and sea for freight deliveries and reducing the number of HGVs by road. However, it is disappointing that this message has only properly been taken on board after DCO submission and not during the eight years and four consultation stages that preceded it. It is disappointing that the rail and sea proposals are only for **potential** changes that appear to be far from certain and, even if these are fully delivered, there will still be a large number of lorries on the roads that will cause the damage previously mentioned.

We find it difficult to understand why the proposals cannot be much firmer at this stage. At consultation stages 1 and 2 there were proposals for both rail and sea led strategies. Stage 3 included a rail led strategy and stage 4 had a hybrid road and rail strategy for freight transport. Many 100s of pages of proposals have been written about different freight strategies, but it appears that work did not extend to working out how many freight trains can run along the East Suffolk line each night for different scenarios of improvement works, or what sort of beach landing facility could be used to deliver aggregates to site and that work still has to be done now. It is hard not to conclude that sea and rail led strategies were never serious options that have not been investigated fully. It appears that they are only being investigated now because key stakeholders continue to oppose the heavily road dependent freight strategy submitted to the DCO.

Rail Proposals

Looking at the rail proposals we note that there is only the "potential" to increase to four trains per day or "even five" for a "limited peak period", "5 or 6 days a week". We would like to know how much potential, is it four or five trains or actually neither and we are back to two and then three when the green rail route is complete, is it 5 or 6 days per week, how long is a limited peak period, is this period limited by some aspect of rail capacity or limited by the project's peak demand for the materials to be delivered by rail. Most importantly, when it is clearer what you can actually rather than potentially do, what is the actual forecast impact on the number of HGVs on the roads and when will the work be complete? We need something more certain to comment on. We are also concerned about the noise at night for people living near to the railway. We cannot tell whether the proposed noise mitigations will prevent significant disruption to the lives of those affected.

Beach Landing Facility

The beach landing facility proposals are similarly uncertain making it difficult to comment other than to say that we support the maximisation of freight delivery by sea as it has the least impact on local businesses and communities. A minor point as the intention appears positive, but could you clarify how often you expect the coast path to be closed. The wording "could be kept open...as far as it is reasonably practicable and safe to do so" used in the proposals (2.2.18) could mean hardly ever open, hardly ever closed or everything in between.

Overall View on Freight Transport

Our overall view on the freight proposals is that delivery by sea should be prioritised over rail and then rail over road because we believe the impacts on local businesses and communities would be minimised by that approach. Even if the options that maximise sea and rail delivery are chosen and fully delivered, the proposals do not reduce delivery by road enough. There will still be far too many HGVs on the unsuitable roads causing congestion, damaging local businesses and local communities. The proposals say "Even with unlimited rail and sea capacity, however, the volume of material moved by HGV is unlikely to be less than 40% of the total as this proportion of materials is best suited to road transportation". That volume of HGV traffic will cause harm that needs to be mitigated. The harm can be mitigated by further road enhancements which EDF have thus far been unwilling to make, and / or it can be mitigated by increasing the proportion of materials delivered by rail and sea. Materials that are "best suited" to road transportation do not have to be delivered by road. Some of those materials can be delivered by sea or rail. It may cost EDF more to do that in order to reduce the cost and impact on local businesses and communities but that is often the way with mitigation and is not the basis to rule it out.

Main Platform

The proposals include the reduction in height of one of the pylons but the retention of the others and no proposals for replacing the pylons with over or under ground interconnection. We ask again that an alternative design of interconnection is considered that cause less visual harm. We understand that Suffolk County Council have commissioned research that identifies alternatives.

Yoxford Roundabout

The proposals for the Yoxford roundabout look reasonable. However, we would like some reassurance that the roundabout will be safe for cyclists and pedestrians. The existing junction is on a sharp bend which tends to calm the traffic to speeds well below 30 mph. The new roundabout will allow traffic to approach much faster. We are particularly concerned about traffic approaching from the north downhill at speeds above the current 40 mph speed limit. It appears traffic will have good line of sight to opposite traffic turning right and could therefore enter the roundabout at significant speed if they saw the junction was clear. This would represent a risk to cyclists turning right into the B1122 and potentially to pedestrians. This risk should be mitigated.

Overall View

Yoxford Parish Council do not want to continually oppose Sizewell C. We would like EDF to make their proposals, be clear on the harms they cause and identify reasonable mitigations that address those harms. We are fed up with proposals that represent the absolute minimum EDF think they can get away with that leave a lot of harm for local businesses and communities to pick up. The only reason we have the current proposals is because it became obvious that the DCO submission was less than EDF could get away with. Even assuming the best case split between sea / rail and road we believe these new proposals do not go far enough and the number of HGVs will still create unacceptable harm for local communities and businesses. Although Sizewell is a designated site for new nuclear builds the local transport infrastructure and the constrained and sensitive nature of the site do not lend themselves to a development of the size being proposed by EDF. Much more needs to be done to mitigate the impacts of what is being proposed.

As we get nearer to a decision on whether to proceed with Sizewell C we would like to raise again our concern about how the development is managed once underway. We are very concerned that issues that arise during construction will increase the impacts on local businesses and communities. It is easy to envisage scenarios where early road improvements are delayed, it becomes difficult to run the forecast number of trains, the beach landing capacity is lower than hoped for and so on. These scenarios are likely to lead to a situation where the project will be delayed and / or cost more unless dispensation is given to increase the number of HGVs on the roads with the consequential increase in impact on local businesses and communities. We would like to see some firm commitments to HGV volumes

above which dispensation will not be sought. In particular, what would the maximum permissible HGV volumes be on the B1122 in the early years and in the rest of the project, what is the maximum duration of "early years" and what would be the maximum permissible HGV volumes be on the A12 and link road throughout the whole project. If dispensation is sought to increase HGV volumes for how many days per year would this be sought and would there be a commitment not to seek any such dispensations during peak holiday season. It is important that these commitments are made in advance of work beginning as we fear that once the project is underway the pressure to keep to the plan will always lead to dispensations that adversely impact the local community.

Councillor Paul Ashton on behalf of Yoxford Parish Council

[REDACTED]
Sent: 18/12/2020

To: sizewell@edfconsultation.info
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Sizewell C Public Consultation - Nov/Dec 2020

Details:

Simon Brown
[REDACTED]

[REDACTED]

Response to the EDFE Sizewell C Consultation on Revised Plans Nov 18th 2020 to Dec 18th 2020

I am writing as an individual who lives in the local area.

It has taken you about ten years to get here and you are still tinkering around the edges of your unwanted development. No sooner do I respond to your Stage 4 Consultation than you announce a further Public Consultation - clearly your intention is to wear down the opposition through a process of attrition. And the proposed changes to your arrangements for road, rail and sea are speculative; there is no guarantee that you will be able to deliver them, so they should be excluded from the Application.

No amount of cosmetic changes - designed to mollify local residents by slightly reducing the volume of lorries - will alter the basic fact that the proposal as a whole is unacceptable.

Firstly I do not accept that there is a need for new nuclear power plants when renewables are becoming increasingly cheap in comparison; and the fact that other countries are turning away from nuclear energy reinforces this view.

Secondly I do not regard Sizewell as a suitable location for a new power station. It lies within an AONB and the proposed development would have a major impact on the landscape. I moved to this location for its tranquility and for its proximity to the Suffolk Heritage Coast and am concerned at the impact that Sizewell C, with all its attendant infrastructure will have on the area; its character is bound to be adversely affected by such an out-of-scale development, and it is already having to accommodate

the requirements of Scottish Power Renewables. We have lived with a large-scale power station on our doorstep for many years – we don't want another one.

Thirdly I do not believe that the proposals make sufficient allowance for the sensitive nature of the surrounding environment. You make a great deal of your consideration of the environmental sensitivities of the area but you are not fooling anyone. The development will require you to take land from an SSSI, which I believe should be treated as inviolable; and all talk about "mitigation" is thoroughly unconvincing, particularly when considered in light of your withholding of the research information that supposedly underpins your environmental statements.

And finally I would point out the stupidity of continuing to produce nuclear waste with no clear idea of how you intend to deal with it in the long term. I suggest that, rather than leave the spent fuel in our locality, you divide it up into equal portions and store it on the properties of the eDF Board of Directors. Let them take responsibility for the mess that the process leaves behind.

Re. the specific changes since the last consultation document:

Freight Management

If you think 500-700 HGV movements in a day is an acceptable situation to inflict upon a rural community I suggest you think again. To be clear: I don't want ANY additional HGVs. Your estimates (which I don't trust anyway, just as I don't trust much else that EDF puts out) are not accompanied by any recognition of the fact that in the event of interruption to rail or sea links, all of the freight would be loaded on to the roads; and the implication at 3.1.13 that the impact of an avalanche of lorries won't be as bad as it sounds because some of them will be vehicles under 3.5 tonnes fails to mention that a good number will be far in excess of 3.5 tonnes. Furthermore the proposals don't do anything to relieve the pressure on the roads (particularly the B1122) for the first two years - living in the area will be a nightmare.

Increased frequency of train movements

I am concerned at the use of overnight trains which are bound to be disruptive to local residents along the East Suffolk Line.

Enhancing the permanent BLF

The additional piling will result in more damage to the marine environment. In general the impact on the coast is unquantifiable, and the statement at 3.3.11 that the grillage will "still allow the natural movement of sediment as far as reasonably practicable" gives me no reassurance. Who knows what the effect will be farther along the coast? The impact on the coastal geomorphology, in particular the longshore bars, in what is an important conservation area has not been fully assessed: apparently "further assessment is needed" (p.51).

And when are you going to release your previous environmental impact assessment which concluded that a larger BLF would be too environmentally damaging?

A new temporary BLF

More disturbance of the seabed, and ongoing dredging required - all this is certain to have an effect on fish populations which in turn will disrupt the breeding success of important bird populations along the coast, especially little terns which return to the Minsmere-Walberswick Special Protection Area (SPA) each year. There will also be an adverse effect on the harbour porpoise. Either the SPA designation means something or it doesn't. You seem to think the latter.

New, temporary BLF options

None is appropriate.

SSSI Crossing

This remains a total disaster. What you refer to as a “bridge” (4.5.7) is of course no such thing; it is an embankment with a widened culvert. The SSSI is still being desecrated, and what is one of the most important wildlife areas in the UK is going to suffer the constant presence of HGVs with their attendant emissions, noise and light. And all the grand expressions about your concern to minimise the environmental impact of your proposal were shown to be worthless when you started felling Coronation Wood in advance of any approval and without having secured the necessary licences from Natural England. I simply don’t believe that you care at all. You’ll do as little as you can get away with, and if you could concrete over the whole area, you undoubtedly would.

Fen Meadow replacement

The idea that the rare fen meadow habitat at Sizewell can be somehow recreated at a site in West Suffolk is not supportable, as it requires specific hydrological conditions. Simply dumping some topsoil from Sizewell and playing around with the adjacent watercourses won’t begin to replace what is proposed to be destroyed. The whole project demonstrates a level of ecological ignorance that I have come to expect from eDF.

Water Resource Storage Area

I have doubts as to whether new foraging habitat for marsh harriers can be successfully created, let alone that wet woodland will eventually emerge “either through natural successional processes or through planting” (2.3.27).

Surface Water

Assuming there is some substance to the claim that this will be used only in the event of an extreme storm event (i.e expected only once in a 30-year period) then it would seem reasonable. However it has become common for such meteorological estimates to turn out woefully incorrect.

Other Main Site Changes

The increase in the height of the sea defences from 10.2mAOD to 14mAOD (or possibly 15mAOD - see 4.8.12) suggests to me that you recognise what a vulnerable site this is on which to build a nuclear facility. No predictions of what will happen to the coastline in twenty years can be relied upon and you are proposing to keep spent fuel onsite beyond 2100. It would be laughable if it wasn’t so dangerous.

I note that in the listing of changes to the Order Limits for the main development site the reductions are typically “minor” or “partial”, whereas the additions aren’t. At every stage the development is swallowing more and more land.

Sizewell B Relocated Facilities

It was truly disgraceful that Coronation Wood has been felled and even more reprehensible that felling commenced before the necessary permits had been obtained - and all for a development that may not even get approval.

The inclusion of plans for what you might do with Pillbox Field if you secure some kind of agreement with Sizewell A would seem entirely superfluous. Moreover any use of Sizewell A land runs counter to previous assurances that it would be returned to the community as a greenfield site.

Associated Development Changes

It is mystifying to me how an area of arable land to the west of Westleton can provide appropriate mitigation for the loss of marsh harrier foraging habitat over the Sizewell Marshes SSSI.

More trees removed - just what I'd expect.

In summary the changes proposed do absolutely nothing to diminish my opposition to your proposed development which will significantly affect the quality of my life. I don't want your reactors or your nuclear waste on my doorstep. I don't want your roads, your railway, your park and rides, your beach landing facilities, your light pollution, or your hideous campus. You have done enough damage to the AONB already.

NNG Generation Company (SZC) Limited
[Sent by e-mail to: info@sizewellc.co.uk]

18 December 2020

Dear Sir/Madam,

Sizewell C: Consultation on proposed changes

Thank you for the opportunity to comment on the proposed changes to the Sizewell C project. Anglian Water is the water and/or sewerage undertaker for the site and associated development. The following response is submitted on behalf of Anglian Water and should be read in conjunction with our previous comments submitted to the Planning Inspectorate and previous pre-application consultations.

Main development site

Greater flexibility as to where certain Sizewell B facilities are relocated

We note that two alternative options have been identified for relocating Sizewell B facilities in addition to the site to the north with the benefit of planning permission. Both options are located adjacent to the existing power stations and do not include any existing water recycling infrastructure managed by Anglian Water. As such we have no comments to make in respect of this change.

Changes to heights and activities on the main development site

We note that changes are proposed to parameters for height for uses on the main development site together with an additional stockpile area. Anglian Water does not have any comments to make in respect of height of the proposed buildings and structures as this is outside of our role as an infrastructure provider.

Water resource storage area

Reference is made to the relocation of a non-potable water source for construction activities including dust suppression. Essex and Suffolk Water are the incumbent water company for the main development site and the proposals do not relate to water supply network. Therefore, we have no comments to make in respect of this change.



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Registered in England
No. 2366656.

an AWG Company

SSSI Crossing Design

We note that changes are proposed to the design of the crossing of Sizewell Marshes SSSI. Anglian Water does not have any comments to make in respect of the crossing design as Natural England would comment on the acceptability of the proposals in respect of the designated SSSI.

Tree retention on main site

Anglian Water does not have any comments to make in respect of changes to the plans for the retention of trees and hedging on the main site as this is outside of our role as an infrastructure provider.

Surface water

It is proposed to discharge surface water to the foreshore via a temporary outfall. As this would not interact with the public sewerage network we have no comment to make in respect of this change.

Changes to the sea defence

Reference is made to changes to the proposed design of sea defences to make it more efficient and resilient for climate change. Anglian Water is responsible for managing the risk of flooding to the public sewerage network with the Environment Agency commenting on the risk of coastal flooding. As such we have no comments to make in respect of this change.

Extension of the Order Limits to provide for fen meadow habitat at Pakenham

Reference is made to the creation of a new fen meadow habitat. The land identified does not include any existing water supply or water recycling infrastructure managed by Anglian Water. As such we have no comments to make in respect of these change.

A new bridleway link between Aldhurst Farm and Kenton Hills

Reference is made to the creation of a new bridleway link. The land identified does not include any existing water recycling infrastructure managed by Anglian Water. As such we have no comments to make in respect of this change.

Changes to the main development site red line boundary and at Sizewell A

Reference is made to the removal of two areas of land which forms part of the main development site located off Love's Lane and adjacent to the existing power stations. The land identified does not include any existing water recycling infrastructure. As such we have no comments to make in respect of these changes.

Change to red line boundary at the Halesworth fen meadow habitat site

Reference is made to the inclusion of additional areas of land to provide access to the Halesworth fen meadow habitat site from Blyth Road and the A144. The proposed site is adjacent to Halesworth Water Recycling Centre (formerly sewage treatment works). As such it would utilise the same access as Halesworth Water Recycling Centre.

This operational site is managed by Anglian Water on behalf of our customers to provide water recycling services on a continuous basis for operational and maintenance purposes. We welcome confirmation of how to this site will be maintained during and after construction, the anticipated level of traffic movements and any identified mitigation.

Change to red line boundary at the Benhall fen meadow habitat site

Reference is made to the inclusion of additional areas of land to provide access to the Benhall fen meadow habitat site from the A1094 and Aldecar Lane. The proposed site is adjacent to Benhall Water Recycling Centre (formerly sewage treatment works). As such it would utilise the same access as Benhall Water Recycling Centre.

This operational site is managed by Anglian Water on behalf of our customers to provide water recycling services on a continuous basis for operational and maintenance purposes. We welcome confirmation of how to this site will be maintained during and after construction, the anticipated level of traffic movements and any identified mitigation.

There is also a foul sewer which runs in parallel to Aldecar Lane and it appears that access from this site to the habitat site from this road would cross this sewer. As such we would wish to agree how any potential impacts to the above assets would be mitigated as part of the construction of the solar farms.

Change to red line boundary at the marsh harrier habitat improvement area in Westleton

Reference is made to the inclusion of additional areas of land to provide access to the northern and southern boundaries of the marsh harrier habitat site at Westleton. The land identified does not include any existing water recycling infrastructure. As such we have no comments to make in respect of this change.

Associated development

Southern Park and Ride at Wickham Market

We note that changes are proposed to the north west landscape bund. Anglian Water does not have any comments to make in respect of landscape mitigation as landscape mitigation is outside of our role as an infrastructure provider.

It is also proposed to make changes to reduce the extent of the Order Limits adjacent to the south of A12. The land identified does not have any existing water supply or water recycling infrastructure. As such we have no comments to make in respect of this change.

Sizewell Link Road

We note that a number of changes are proposed to increase and reduce the extent of the Order Limits for the Sizewell Link Road. The land identified does not appear to include any existing water supply or water recycling infrastructure. As such we have no comments to make in respect of these changes.

Two village bypass

We note that a number of changes are proposed to increase the extent of the Order Limits for the Two Village Bypass. The land identified does not include any existing water supply or water recycling infrastructure. As such we have no comments to make in respect of these changes.

Other Associated Development sites -Reduction of Order limits

We note that a number of changes are proposed to reduce the extent of the Order Limits in the vicinity of a number of other sites including the Northern Park and Ride site. The land identified does not include any existing water supply or water recycling infrastructure. As such we have no comments to make in respect of these changes.

Protective Provisions for Anglian Water

Anglian Water has previously shared with NNG Generation Company (SZC) Ltd's legal representatives our standard protective provisions we would wish to see included in the Draft DCO (copy attached). We would wish to reach agreement about the wording for Anglian Water to be included in the Draft DCO including the protective provisions. If you would like to suggest any changes or additions to these provisions, we would be grateful if these could be shared with Anglian Water for comment.

Should you have any queries or require any further information from Anglian Water to assist in the development of this project please let me know.

Yours sincerely



Stewart Patience
Spatial Planning Manager, MRTPI

APPENDIX: STANDARD PROTECTIVE PROVISIONS FOR ANGLIAN WATER

FOR THE PROTECTION OF ANGLIAN WATER

(1) For the protection of Anglian Water, the following provisions shall, unless otherwise agreed in writing between the undertaker and Anglian Water, have effect.

(2) In this part of this schedule –

“apparatus” means any works, mains, pipes or other apparatus belonging to or maintained by Anglian Water for the purposes of water supply and sewerage and

(a) any drain or works vested in Anglian Water under The Water Industry Act 1991,

(b) any sewer which is so vested or is the subject of a notice of intention to adopt given under section 102 (4) of The Water Industry Act 1991 or an agreement to adopt made under section 104 of that Act,

and includes a sludge main, disposal main or sewer outfall and any manholes, ventilating shafts, pumps or other accessories forming part of any sewer, drain, or works (within the meaning of section 219 of that Act) and any structure in which apparatus is or is to be lodged or which gives or will give access to apparatus.

“alternative apparatus” means alternative apparatus adequate to enable Anglian Water to fulfil its statutory functions in not less efficient a manner than previously;

“functions” includes powers and duties

“in” in a context referring to apparatus or alternative apparatus in land includes a reference to apparatus or alternative apparatus under, over or upon land; and

“plan” includes sections, drawings, specifications and method statements.

(3) The Company shall not interfere with, build over or near to any Apparatus within the Order Land or execute the placing, installation, bedding, packing, removal, connection or disconnection of any apparatus, or execute any filling around the apparatus (where the apparatus is laid in a trench) within the standard protection strips which are the strips of land falling the following distances to either side of the medial line of any relevant pipe or apparatus; 2.25metres where the diameter of the pipe is less than 150 millimetres, 3 metres where the diameter of the pipe is between 150 and 450 millimetres, 4.5 metres where the diameter of the pipe is between 450 and 750 millimetres and 6 metres where the diameter of the pipe exceeds 750 millimetres unless otherwise agreed in writing with Anglian Water, such agreement not to be unreasonably withheld or delayed, and such provision being brought to the attention of any agent or contractor responsible for carrying out any work on behalf of the Company.

(4) The alteration, extension, removal or re-location of any apparatus shall not be implemented until

(a) any requirement for any permits under the Environmental Permitting Regulations 2010 or other legislations and any other associated consents are obtained, and any

approval or agreement required from Anglian Water on alternative outfall locations as a result of such re-location are approved, such approvals from Anglian Water not to be unreasonably withheld or delayed; and

(b) the Company has made the appropriate application required under the Water Industry Act 1991 together with a plan and section of the works proposed and Anglian Water has agreed all of the contractual documentation required under the Water Industry Act 1991, such agreement not to be unreasonably withheld or delayed; and such works to be executed only in accordance with the plan, section and description submitted and in accordance with such reasonable requirements as may be made by Anglian Water for the alteration or otherwise for the protection of the apparatus, or for securing access to it.

(5) In the situation, where in exercise of the powers conferred by the Order, the Company acquires any interest in any land in which Apparatus is placed and such apparatus is to be relocated, extended, removed or altered in any way, no alteration or extension shall take place until Anglian Water has established to its reasonable satisfaction, contingency arrangements in order to conduct its functions for the duration of the works to relocate, extend, remove or alter the apparatus.

(6) Regardless of any provision in this Order or anything shown on any plan, the Company must not acquire any apparatus otherwise than by agreement, and before extinguishing any existing rights for Anglian Water to use, keep, inspect, renew and maintain its apparatus in the Order land, the Company shall, with the agreement of Anglian Water, create a new right to use, keep, inspect, renew and maintain the apparatus that is reasonably convenient for Anglian Water such agreement not to be unreasonably withheld or delayed, and to be subject to arbitration under article 59.

(7) If in consequence of the exercise of the powers conferred by the Order the access to any apparatus is materially obstructed the Company shall provide such alternative means of access to such apparatus as will enable Anglian Water to maintain or use the apparatus no less effectively than was possible before such obstruction.

(8) If in consequence of the exercise of the powers conferred by the Order, previously unmapped sewers, lateral drains or other apparatus are identified by the company, notification of the location of such assets will immediately be given to Anglian Water and afforded the same protection of other Anglian Water assets.

(9) If for any reason or in consequence of the construction of any of the works referred to in paragraphs 4 to 6 and 8 above any damage is caused to any apparatus (other than apparatus the repair of which is not reasonably necessary in view of its intended removal for the purposes of those works) or property of Anglian Water, or there is any interruption in any service provided, or in the supply of any goods, by Anglian Water, the Company shall,

(a) bear and pay the cost reasonably incurred by Anglian Water in making good any damage or restoring the supply; and

(b) make reasonable compensation to Anglian Water for any other expenses, loss, damages, penalty or costs incurred by Anglian Water

by reason or in consequence of any such damage or interruption.



Response from PETTISTREE Parish Council

concerning the

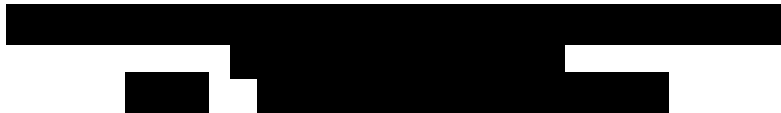
Consultation Document on Proposed Changes
Issued in November – December 2020

for

Sizewell C Proposed Nuclear development

Submitted by e-mail to The Planning Inspectorate
on
18th December 2000

MR. JEFFREY P. HALLETT MA, FRCS.
Chairman of Pettistree Parish Council



18th December 2020

Comments from Pettistree Parish Council on the Proposed Changes
Issued in November – December 2020
for
Sizewell C Proposed Nuclear development

The reader is also referred to the two documents below:-

“Response from Pettistree Parish Council concerning the Stage 3
Pre-Application Consultation”. 26th March 2019.

Comments from Pettistree Parish Council on the Development of Sizewell C.
Consultation Stages 3 and 4. 16th September 2019

1. General Comments on the Proposed Changes.

1. The new document has not provided answers to the many concerns raised in the previous comments by Pettistree Parish Council.
2. The new information provided is often vague and/or incomplete, especially regarding the sea defences and the way that the beach landing facility will be constructed and operated.
3. Mitigation measures are not suggested for many of the concerns that have been raised by Pettistree, surrounding villages, and indeed many of the parishes throughout Suffolk.
4. Where mitigation measures have been suggested they are often couched in terms of “intends” and “if practicable”, thereby giving us little reassurance that our concerns will be addressed.
5. Many if not all of our concerns about the Proposed Changes are echoed in the documents recently submitted by the Suffolk County Council and the East Suffolk Council.
6. The paragraphs below show that most of our concerns relate to the construction period, but for many residents the 12 or more years will be more than a lifetime.

2. Traffic Congestion on the B1078.

1. We found nothing about effectively mitigating the congestion on the B1078 in Wickham Market or Campsea Ashe resulting from Sizewell cars and vans approaching or leaving the Southern Park and Ride.
2. We found nothing about mitigating the Pettistree and similar rat-runs that will develop as both Sizewell traffic and non-Sizewell traffic tries to avoid the congestion of cars and vans approaching or leaving the Southern Park and Ride. No measures have been suggested to stop cars, vans and non-Sizewell HGVs diverting through our narrow one-track lanes to avoid the congestion.
3. We have joined Wickham Market Parish Council in many of the discussions with EDF about the anticipated problems on the B1078 from the very beginning of consultations. (Because the effects of B1078 congesting will impinge on us.) We remain disappointed that EDF have repeatedly failed to produce any solutions to

the anticipated congestion other than to offer money to Wickham Market to try to sort it out themselves.

3. Overload of the A12.

1. We are still concerned that the A12 will be overloaded by HGVs and other Sizewell-bound vehicles both locally to us and more distantly at the so-called Five-Ways roundabout near the Park and Ride, and especially at the roundabouts on the A12 as it encounters and passes Woodbridge (where congestion often occurs already). The plans to accommodate HGV delivery vehicles at a site near the Seven Hills interchange with the A14 appear to be incomplete and unconfirmed.

3. Sea Transport Plans.

1. Pettistree welcomes the expressed intention to use more transport by sea, but this is not a solid commitment and the words indicate “intention” and “if possible”. The plans for an extended shore facility are not completed.
2. The vague plans do not give confidence that the hoped-for reduction in HGV road transport will be achieved by sea transport.

4. Rail Transport Plans.

1. The commitment to make more use of rail transport is welcome and should reduce HGV traffic to a useful extent. However, the problems of increased noise and vibration from the trains for properties near the tracks have no obvious mitigation (apart from slow running and a different locomotive) that could impinge on passenger traffic, especially if a fifth train is introduced.
2. It is regrettable that no commitment has been received from those responsible for main-line services that the extra Sizewell freight traffic can be accommodated without disrupting their own services.

5. Sea Defences.

1. We welcome the intention to strengthen the sea defences but the plans still describe a range of possibilities and the new drawings do not indicate a final and detailed well thought out plan, so they do not give confidence. What plans there are indicate that more land will be taken in for the site.

6. Pylons.

1. We regret the refusal to abandon or fully justify the use of extra pylons near the shoreline rather than using underground cabling. The new artist's impression and plans do not show the pylons in a way that can give a clear impression of their adverse effect on the sightlines around the development.

7. Light Pollution

1. Light scatter from the Southern Park and Ride will be only partially mitigated by careful aiming of the lamps. Pettistree will lose its enjoyment of its present relatively dark night sky.

8. Timing.

1. The proposed changes do not give any reassurance that the measures to mitigate damage to the environment and to the life of the community will be in place when construction starts. Delay will aggravate the effect from all the areas of concern above.

END

Rendham Parish Council response to EDFs consultation on the proposed changes to DCO.

15th December 2020

1.0 Introduction

Rendham Parish Council submitted a Relevant Representation (reg ID with Planning Inspectorate 20026481) to the original DCO but did not submit any material during the previous consultation periods.

Rendham Parish Council have met infrequently during Covid restrictions, we do not meet virtually. It has therefore been difficult to gather Councillor and parishioners views on this consultation.

In general we welcome any reduction in HGV traffic and reductions to impacts on the environment but overall, these new proposals do not change RPC's views stated in the relevant representation to the DCO.

2.0

Rendham is a small village on the B1119, 2.2 miles west of the A12.

11 miles West of Sizewell B. The B1119 runs through the village and links Saxmundham to Framlingham. Both towns used frequently by parishioners for their amenities.

ANY increase in traffic on the A12 which we need to cross to reach local amenities has a negative impact on villagers. The B1119 will also be used by construction workers, commuters and locals wishing to avoid traffic or incidents on the A12. We are concerned Rendham will be used as a rat-run.

Air pollution:

Data from Sibton, DEFRA's only monitoring station in east Suffolk (4 miles from Rendham), reveal that ozone pollution levels here have already exceeded the UK government's target maximum (100 µgm-3 maximum 8-hour mean) on 37 occasions year to date (Jan - 23 Sept, 2020), including for an extended 10 day period in August. This is despite a general reduction in UK and European air pollution as a result of reduced economic and social activity due to the coronavirus pandemic.

***see appendix 1,2 & 3 taken from Georgina King's written representation on behalf of SEAS on SPRS EAN1 application.

3.0

Increased frequency of train movements

The railway line does not run close to Rendham. We are approximately 2.7 miles west of Saxmundham Railway Station.

Any disruption to rail services affects villagers as we have no other form of public transport.

We are also conscious that increased freight trains do have negative effects on people living close to the line with noise and vibration.

Crossings closed more frequently may hinder emergency services.

4.0

Enhancing Beach Landing facilities both Permanent and Temporary

Sizewell beach is the closest beach to Rendham. It is used by walkers, dog walkers and families all year round.

It is very difficult to get a sense of scale from the 2D drawings on the consultation. We would like to see more drawings of the proposed BLF's, both temporary and permanent, in context to the beach and proposed new buildings.

Positive impacts of BLF's would be less HGVs on the road but in Summer only as BLFs will not be used in winter.

Enjoyment of the beach will be impaired as the visual impact and landscape will be altered.

Negative impacts on marine wildlife.

We agree that Enhancing is a positive word as stated by Marianne Fellows, Town Councillor for Aldeburgh in a recent online meeting with JLAG 26.11.20 "This is not enhancement but additional"

5.0

Crossing of SSSI changes

Rendham is approximately 7.9miles to the SSSI area. Parishioners visit the area to enjoy walks and the wildlife.

Any reduction to the impact on this area is welcomed but we would question whether a road should be allowed to cross a SSSI at all and that mitigation for such loss is not achievable.

6.0

Reduction in Land required at B1119/A12 Junction

From the drawing sent to us by Sizewell C office we understand the changes leaves the layby on the B1119 as it is. It appears from the original DCO proposed changes are a slight widening to the left turn from B1119 to northbound A12 and slight widening to the right turn into Saxmundham if travelling north on A12.

This junction is difficult to cross at present and an accident site

www.crashmap.co.uk , which uses government data, has 9 recorded accidents (3 serious, 6 Slight) at this junction from 2015- 2019.

Recent changes to rights of way have been made and add to uncertainty. Should the project be granted permission we would like to see more changes to make this junction safer for all users.

Appendix 1
24 hour period up to 8am Sat 1st Aug 2020

Eastern					
SITE	8 Hourly Mean Ozone ($\mu\text{g m}^{-3}$)	Hourly Mean Nitrogen dioxide ($\mu\text{g m}^{-3}$)	max 15min mean Sulphur dioxide ($\mu\text{g m}^{-3}$)	24Hour mean PM _{2.5} Particles ($\mu\text{g m}^{-3}$)	24Hour mean PM ₁₀ Particles ($\mu\text{g m}^{-3}$)
Borehamwood Meadow Park	N/M	34 (Low 1)	N/M	N/M	N/M
Cambridge Roadside	N/M	44 (Low 1)	N/M	N/M	N/M
Luton A505 Roadside	N/M	43 (Low 1)	N/M	N/M	N/M
Norwich Lakenfields	182 (High 7)	28 (Low 1)	N/M	12 (Low 2)	25 (Low 2)
Sandy Roadside	N/M	30 (Low 1)	N/M	23 (Low 2)	37 (Low 3)
Sibton	195 (High 8)	N/M	N/M	N/M	N/M
Southend-on-Sea	141 (Moderate 6)	34 (Low 1)	N/M	14 (Low 2)	28 (Low 2)
St Osyth	186 (High 7)	23 (Low 1)	N/M	N/M	N/M
Stanford-le-Hope Roadside	N/M	55 (Low 1)	N/M	20 (Low 2)	37 (Low 3)
Thurrock	127 (Moderate 5)	32 (Low 1)	3 (Low 1)	N/M	34 (Low 3)
Weybourne	183 (High 7)	N/M	N/M	N/M	N/M
Wicken Fen	161 (High 7)	14 (Low 1)	5 (Low 1)	N/M	N/M

Appendix 2 24hr period up to 4pm Sat 1st Aug 2020

Eastern					
SITE	8 Hourly Mean <u>Ozone</u> (μgm^{-3})	Hourly Mean <u>Nitrogen dioxide</u> (μgm^{-3})	max 15min mean <u>Sulphur dioxide</u> (μgm^{-3})	24Hour mean <u>PM_{2.5} Particles</u> (μgm^{-3})	24Hour mean <u>PM₁₀ Particles</u> (μgm^{-3})
Borehamwood Meadow Park	N/M	16 (Low 1)	N/M	N/M	N/M
Cambridge Roadside	N/M	35 (Low 1)	N/M	N/M	N/M
Luton A505 Roadside	N/M	23 (Low 1)	N/M	N/M	N/M
Norwich Lakenfields	182 (High 7)	28 (Low 1)	N/M	12 (Low 2)	25 (Low 2)
Sandy Roadside	N/M	30 (Low 1)	N/M	23 (Low 2)	37 (Low 3)
Sibton	195 (High 8)	N/M	N/M	N/M	N/M
Southend-on-Sea	141 (Moderate 6)	31 (Low 1)	N/M	14 (Low 2)	28 (Low 2)
St Osyth	186 (High 7)	19 (Low 1)	N/M	N/M	N/M
Stanford-le-Hope Roadside	N/M	19 (Low 1)	N/M	20 (Low 2)	37 (Low 3)
Thurrock	127 (Moderate 5)	26 (Low 1)	2 (Low 1)	N/M	34 (Low 3)
Weybourne	183 (High 7)	N/M	N/M	N/M	N/M
Wicken Fen	161 (High 7)	9 (Low 1)	5 (Low 1)	N/M	N/M

Appendix 3 – Air quality levels key

Air Pollution Banding	Value	Accompanying health messages for at-risk individuals*	Accompanying health messages for the general population
<u>Low</u>	<u>1-3</u>	Enjoy your usual outdoor activities.	Enjoy your usual outdoor activities.
<u>Moderate</u>	<u>4-6</u>	Adults and children with lung problems, and adults with heart problems, who experience symptoms , should consider reducing strenuous physical activity, particularly outdoors.	Enjoy your usual outdoor activities.
<u>High</u>	<u>7-9</u>	Adults and children with lung problems, and adults with heart problems, should reduce strenuous physical exertion, particularly outdoors, and particularly if they experience symptoms. People with asthma may find they need to use their reliever inhaler more often. Older people should also reduce physical exertion.	Anyone experiencing discomfort such as sore eyes, cough or sore throat should consider reducing activity, particularly outdoors.
<u>Very High</u>	<u>10</u>	Adults and children with lung problems, adults with heart problems, and older people, should avoid strenuous physical activity. People with asthma may find they need to use their reliever inhaler more often.	Reduce physical exertion, particularly outdoors, especially if you experience symptoms such as cough or sore throat.

From: [REDACTED]@english-heritage.org.uk

Sent: 18/12/2020

To: sizewell@edfconsultation.info

CC: Rebecca.Calder@sizewellc.com [REDACTED]@edf-energy.com

Subject: Sizewell C Proposal - English Heritage Trust - Leiston Abbey
Second Site

Sirs

Further to my previous submission in August 2020, please note that we have had further discussions with EDF about potential mitigation measures to help offset harm to the site from the development.

We are currently working on a package of suggestions as part of a Sustainable Conservation and Management plan for the monument and will be able to provide further information in due course.

Kind regards

Geoff Hawkins

Portfolio Surveyor – South

English Heritage

First Floor, Cavendish House, 233-235 High Street, Guildford, GU1 3BJ

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www.twitter.com/EnglishHeritage

From: [REDACTED]@HistoricEngland.org.uk
Sent: 19/12/2020 12:09:55
To: sizewell@edfconsultation.info
CC: [REDACTED]@HistoricEngland.org.uk
Subject: Historic England Response 18th December 2020
Body:

FAO Carly Vince
Chief Planning Officer – Sizewell C

SIZEWELL C
PINS reference EN010012 - Consolation on proposed
changes to the order limit 18th Nov to 18th December 2020 –
Historic England comments

This is just to confirm that we have read the consolation document (dated November – December 2020). I can confirm that we do not have any comments in relation to the documents provided and have noted the changes proposed.

With best wishes

Will Fletcher



Dr Will Fletcher
Development Advice Team Leader (Acting): East
Region



Historic England |



www.historicengland.org.uk

From: [REDACTED]@suffolk.gov.uk

Sent: 18/12/2020

To: sizewell@edfconsultation.info

Subject: Representation Proposed Changes.

I strongly object to the contents in the Consultation On proposed changes (18 November to 18 December 2020).

Fundamentally the proposals by EDF to Build 2 Nuclear Reactors to generate electricity at Sizewell are wholly unacceptable.

The disbenefits of the Proposal greatly exceed the suggested Benefits.

The transport issues should have been properly addressed when the Application was submitted to the Planning Inspectorate and what is now proposed is a fig leaf to cover an wholly unacceptable Planning Application.

EDF have had amply time to present the rail option and the one now proposed at this late stage is flimsy and lacking rigour.

The Maritime Proposals are now tossed in to try and assuage growing public opposition.

These proposals EDF have said these were examined as solutions in the but were rejected by the Company. The evidence as why the Company has now changed its mind is unconvincing.

I reserve my right to submit more details.

GUY MCGREGOR

[REDACTED]

COUNTY COUNCILLOR

HOXNE & EYE DIVISION SUFFOLK COUNTY COUNCIL

[REDACTED]

18 December 2020

FREEPOST SZC CONSULTATION

VIA EMAIL: info@sizewellc.co.uk

17 12 2020

Dear Sir/Madam,

Response to the Sizewell C public consultation on material changes to the DCO application

This response to the Sizewell C public consultation on material changes to the DCO application (ending 18th December 2020) represents the views of National Grid Ventures (NGV) which owns and operates energy businesses in competitive markets in the UK and US, including electricity interconnectors.

As EDF are already aware, NGV also has interests in East Suffolk in relation to two projects known as 'Nautilus' and 'EuroLink.' This letter provides an update on the current position of these two projects. Due to the early stage of our projects and ongoing work on routeing and siting options, we have not commented in detail upon the proposed Sizewell C DCO application modifications.

Nautilus & EuroLink Multi-Purpose Interconnector (MPI) Projects – Current Position

Nautilus is a proposed high voltage direct current (HVDC) electricity link between GB and Belgium. EuroLink is a proposed high voltage direct current (HVDC) electricity link between GB and the Netherlands.

NGV has connection agreements with the NGENSO (National Grid Electricity System Operator) within the Leiston area for both Nautilus and EuroLink. Each of these agreements provide a grid connection to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. The proposed NGET substation at Friston is the location proposed by SPR on the Sizewell 400kV network and forms part of their current DCO applications for East Anglia One North and East Anglia Two.

In September 2020 NGV announced that both Nautilus and EuroLink Interconnector projects have been reclassified as multi-purpose interconnectors (MPIs); a new generation of interconnector that will

connect multiple offshore wind farms via a singular transmission line, enabling the export of excess clean energy and reducing the impact of infrastructure on coastal communities.

Both Nautilus and EuroLink are currently in feasibility stages of project development. Should the projects proceed, they could be operational pre-2030, subject to gaining development consent and final investment decisions for each project.

Since NGV responded to the Sizewell C Stage 4 consultation in September 2019, NGV has continued feasibility assessment work and early engagement with stakeholders. Copies of our publicly available Nautilus FAQs (May 2020) and Briefing Pack (July 2019) are attached to this letter. Further feasibility studies including technical assessment and survey work is required before NGV is ready to present options for initial public consultation. Therefore, at this stage NGV is unable to provide EDF with a detailed description of the projects, including proposed routeing and siting of infrastructure and environmental information on the proposals. Previously, it was anticipated that EIA Scoping would occur in Q1 2021, however further feasibility work is planned for 2021 to inform project development. Current project timescales anticipate an EIA Scoping Report to be produced by Q1 2022 for Nautilus, which is currently more advanced than EuroLink.

Request for Updated Order Limits Shapefile

To assist us in our ongoing feasibility work we would be grateful if EDF could share a revised shapefile for the DCO Order Limits with the proposed amends.

Next Steps

As a registered Interested Party, NGV will continue to monitor the progress of the Sizewell C DCO Application and participate, if required, during the Examination.

NGV will continue to engage with EDF throughout the development of our projects, particularly with a view to the potential for co-ordination of our respective projects to minimise and manage potential impacts.

Should you have any questions on the information presented in this letter please do not hesitate to contact me directly or via the dedicated project email address: info@nautilusinterconnector.com.

Yours faithfully,

Alicia Dawson

Contract Consents Officer

National Grid Ventures (NGV)

Nautilus

Interconnector FAQs

May 2020

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General

Who is National Grid Ventures?

National Grid Ventures is the competitive division of National Grid plc. It operates outside of National Grid's core regulated businesses in the UK and US where it develops and operates energy projects, technologies and partnerships to make energy cleaner, more secure and more affordable for consumers.

NGV's diverse portfolio of low carbon and renewable energy businesses includes sub-sea electricity Interconnectors in the UK and battery storage, wind and solar power in the US.

NGV's Interconnector fleet gives the GB access to secure and affordable energy and will play a critical role in tomorrow's cleaner and smarter energy systems. NGV currently have three Interconnectors in operation and three in construction. By 2030, 90 per cent of the electricity imported through these six Interconnectors will be from zero carbon sources.

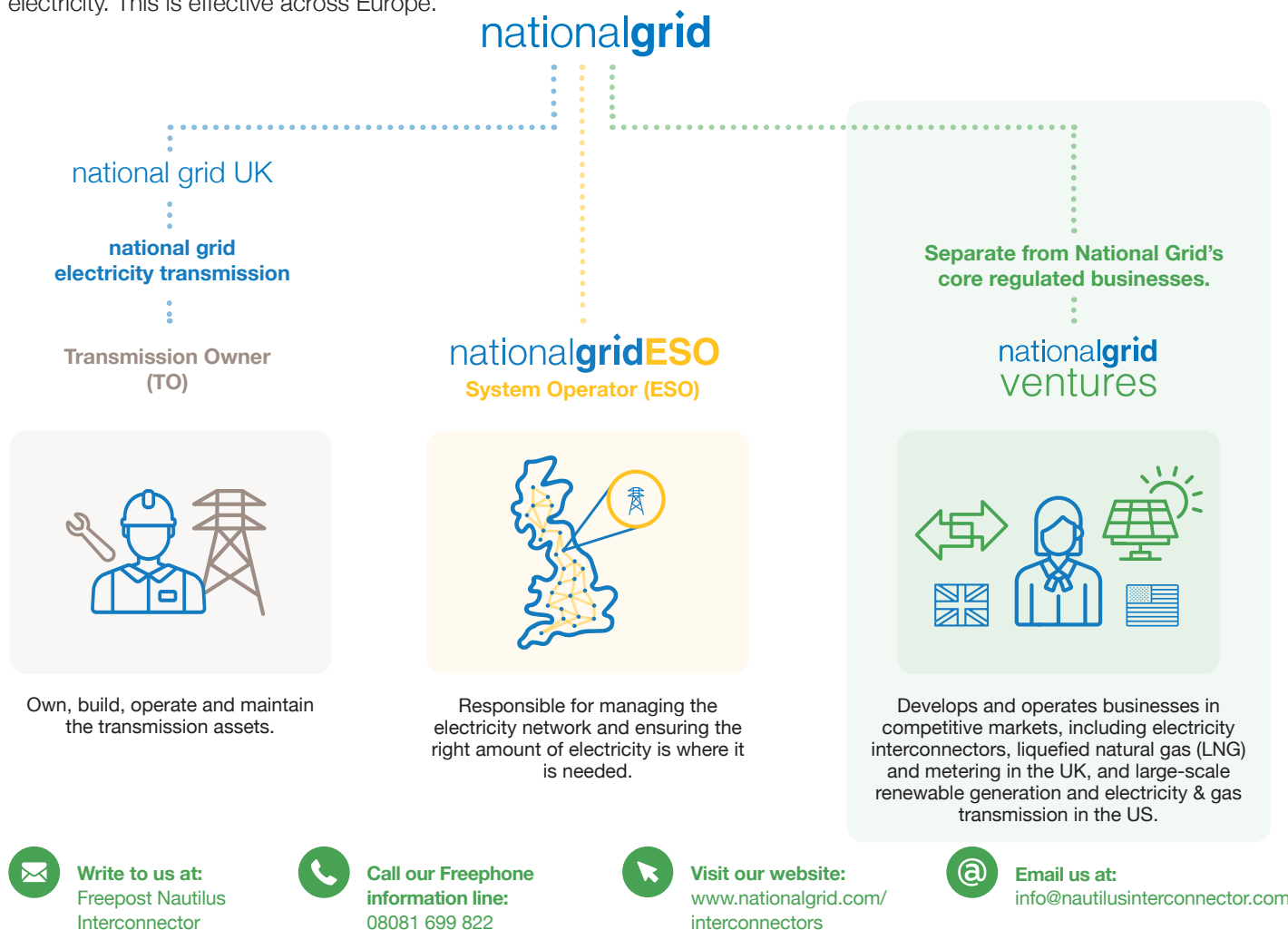
There are different National Grid businesses operating in GB that have different roles

Whilst both organisations are part of the wider National Grid Group, NGV is completely separate to NGET. The separation between NGV and NGET stipulates that NGV is treated the same way as any other energy project promoter.

NGET was separated into two new organisations on 1 April 2019:

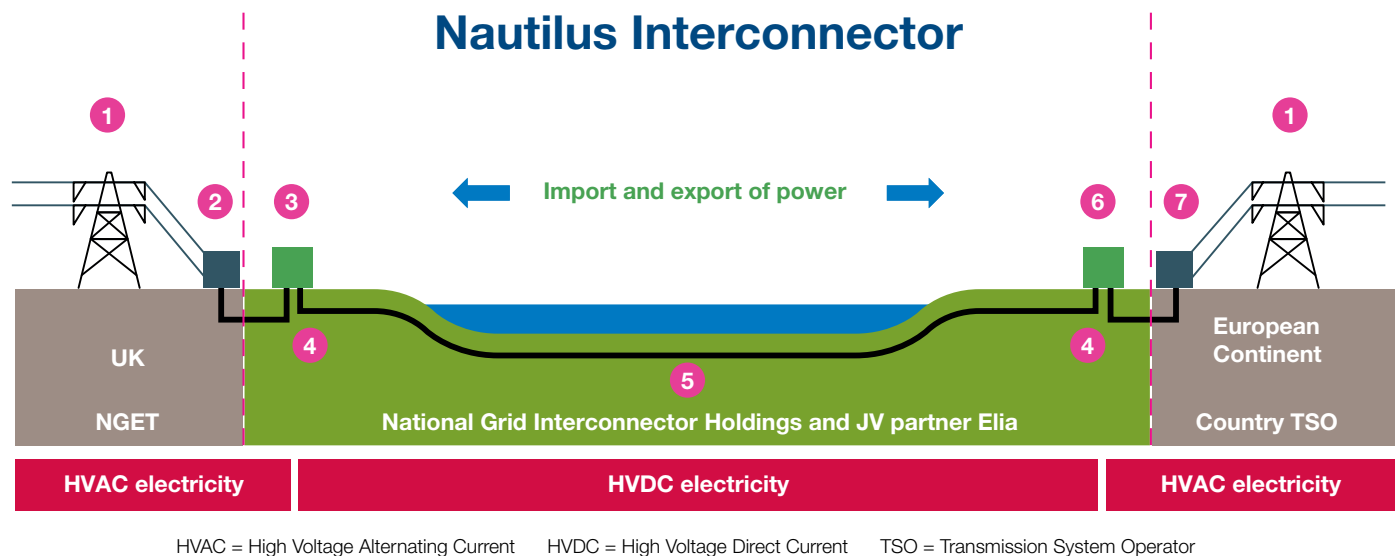
- National Grid Electricity System Operator (ESO) – these are responsible for managing and operating the electricity system in Great Britain.
- National Grid Electricity Transmission (NGET) – these are responsible for the development, construction and operation of all electricity assets in England and Wales (e.g. overhead lines, substations).

The regulator OFGEM stipulates that, across any of its activities, it is not possible for National Grid to be a generator of electricity. This is effective across Europe.



What is Nautilus Interconnector?

Nautilus Interconnector is a proposed second Interconnector between Great Britain and Belgium. When built, it will create a new 1.4 gigawatts (GW) high voltage direct current (HVDC) electricity link between the transmission systems of Great Britain and Belgium. If constructed, Nautilus Interconnector could supply power to one million homes.



Is NGV supportive of an alternative and more co-ordinated solution to energy supply in East Suffolk?

NGV is supportive of the efforts to achieve greater co-ordination in energy infrastructure. NGV continue to promote and test alternative solutions with the UK Government and promoters at home and in Europe.


NGV believes that to achieve the UK Government's energy targets (40 GW by 2030 and 75 GW by 2050) there needs to be greater co-ordination of how wind and Interconnector projects are connected. This is vital to ensure that the UK can meet both energy and environmental challenges and reduce the impact on coastal communities.

NGV is engaging with its European partners and the UK Government as to how it can best utilise the technology and the Interconnector system to bring greater co-ordination with offshore wind projects.


Who will be the decision-making authority for Nautilus Interconnector?

NGV has received confirmation from the Secretary of State for Business, Energy and Industrial Strategy (BEIS) that the proposed Nautilus Interconnector will be treated as a Nationally Significant Infrastructure Project (NSIP) and as a development requiring a Development Consent Order (DCO). This means that the final decision-maker for the project will be the Secretary of State.

In March 2019, NGV requested that the Secretary of State exercise its powers under section 35 of the Planning Act 2008 to deem Nautilus Interconnector as a development for which a DCO would be required. The DCO regime will require NGV to undertake a thorough Environmental Impact Assessment (EIA) and consultation process prior to any application being submitted. NGV and the Secretary of State acknowledge that the DCO consent process will provide a single, unified consenting process with clear and fixed timescales for the development to engage with stakeholders and bring its application forward.

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 **Email us at:**
info@nautilusinterconnector.com

What is a 'Project of Common Interest?'

Projects of Common Interest (PCIs) are key cross border infrastructure projects that link the energy systems of countries in Europe. They are intended to help Europe achieve its energy and climate objectives: affordable, secure and sustainable energy for all citizens. In the long-term, PCIs are also aimed at realising the decarbonisation of the economy in accordance with the Paris Agreement, signed by the UK, which aims to achieve climate neutrality by the end of the century.

In the case of Nautilus Interconnector, the project has been identified as a PCI due to its significant impact on the energy market and market integration between the UK and Belgium. The project will boost competition in the energy market, achieve energy security from a more diverse supply and contribute to our climate and energy goals. The selection process for PCI projects is determined by the Trans-European Networks for Energy (TEN-E) Strategy, which will be complied with throughout the development process for Nautilus Interconnector. PCI status will continue for the project regardless of Brexit, given Member Status is only required for one country involved.

Interconnectors

Why do we need Interconnectors?

Interconnectors are making energy more secure, affordable and sustainable for consumers. Great Britain has experienced success from existing Interconnectors which have connected energy between Great Britain, France, Ireland and the Netherlands.

These projects have helped to lower electricity prices, increase the security of supply and stabilise energy in the Great Britain transmission network.

Interconnectors are vital in making electricity networks more flexible and are increasingly needed to offset the lack of investment in substantial electricity generation plants in the UK, along with addressing the higher demand for cheaper wholesale energy from Europe.

If you would like to find out more about its European partners and the UK Government Interconnectors, you can download NGV's Interconnectors information pack [here](#).

How efficient are Interconnectors?

Interconnectors use HVDC lines. The link between the UK and Belgium will exceed 100 miles end to end. The use of HVDC cables to transport 1400 megawatts (MW) over this distance is proven to be more efficient for losses and will require a smaller number of cables than HVAC.

Which way does the electricity flow between the UK and Belgium?

Electricity normally flows from the market with lower prices to the market with higher prices. On average, UK electricity prices are higher than those in mainland Europe, which typically means that the UK benefits from receiving cheaper electricity.



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info@nautilusinterconnector.com

Connection point and transmission

How was the connection point to the National Transmission System (NTS) for Nautilus Interconnector chosen?

NGV made two separate connection applications to the ESO for connection points for both the Nautilus and EuroLink Interconnector projects. The ESO then undertook an appraisals process to identify a point of connection on its network for each application which included an assessment of environmental, technical and cost factors. As a result of this process, the ESO have provided grid connection offers (for both Nautilus and EuroLink) to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. This substation is more locally known as the proposed NGET substation in Friston.

What does an Interconnector need to connect to the onshore grid?

For Nautilus and EuroLink to connect to the proposed NGET substation at Friston, the proposed substation would require an extension for each additional project.

NGV understand that typically the maximum land take required to facilitate extensions to NGET substations is approximately 1.3 hectares (3 acres) for each connection offered at a location.

NGET has indicated that provision for the land required to extend its substation at Friston has been provided for as part of ScottishPower Renewables proposals for East Anglia ONE North (EA1N) and East Anglia TWO (EA2).

Decisions on changes and upgrades to the NTS are made by NGET in its role as the Transmission Owner. NGV remain in dialogue with NGET to understand if any changes or upgrades may be required to the NTS as a result of NGV's connection agreements.

What is the difference between HVAC and HVDC?

HVAC stands for high voltage alternating current. HVDC stands for high voltage direct current.

HVAC technology is the principle means of power transmission in all modern power systems. The vast majority of all electrical power is generated, transported and consumed as alternating current. HVDC technology is an alternative to HVAC for point-to-point power transmission and may be appropriate in some circumstances for bulk power transfer over long distances or between different grids.

Most energy is generated as alternating current, therefore it is necessary to convert the direct current back to alternating current for onward transmission in the national grid at a converter station.

Other energy projects in the area

How are you working with other energy projects planned in East Suffolk?

NGV is working closely with the other promoters in the area including ScottishPower Renewables and EDF as well as East Suffolk and Suffolk County Councils. Decisions for the routing and siting of Nautilus Interconnector will consider possible benefits of co-location for the environment and surrounding communities as well as other technical constraints. NGV regularly meet with all of the promoters in the area, alongside East Suffolk Council and Suffolk County Council, at the Suffolk Energy Forum.

Cable routeing

How are the cables buried onshore and offshore?

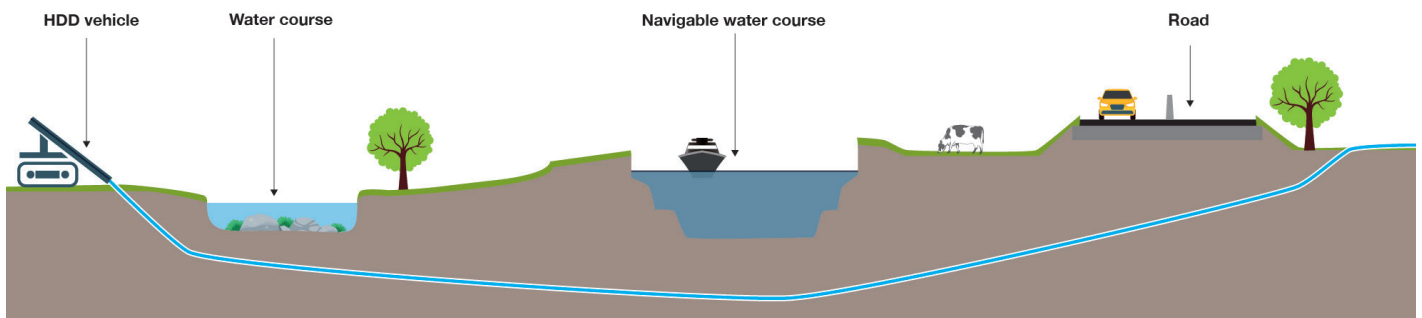
Two HVDC cables are typically buried in a single trench, compared to HVAC cables which typically consist of two trenches with three cables per trench. Offshore, the HVDC cables will be buried far enough below the seabed to ensure that cables don't get snagged.

What are the differences between the crossing techniques of Horizontal Directional Drilling (HDD) and open cut?

Horizontal Directional Drilling (HDD) is a construction technique that involves drilling underneath particularly sensitive areas and infrastructure that the project may encounter along the cable route to lay the onshore cable with minimal disruption. This technique avoids the need for digging deep trenches and allows construction to operate through different ground conditions.

Open cut trench excavation offers an alternative method of cable installation which can be used instead of HDD, particularly in more rural areas and where there are no major obstacles. It consists of excavating a trench section-by-section as the cable is laid. This excavation is then backfilled once the cable laying is complete.

Typical HDD Construction



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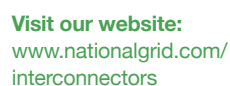
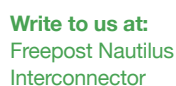


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Typical AC cable construction



This illustration is for illustrative purposes only and is intended to show the typical construction of DC cables for Interconnectors in the UK



Can you use the same cable route as ScottishPower Renewables (SPR)?

The proposed Nautilus Interconnector and the East Anglia ONE North (EA1N) and East Anglia Two (EA2) offshore wind farm projects are different technologies being brought forward by different developers with different timeframes. This means Nautilus Interconnector is not able to share the same cables or cable trenches. There may be potential to locate the proposed cables within an appropriate distance from SPR's cable route which will be considered as NGV assess different options for cable routing. NGV is studying the applications for both offshore wind farms in detail and liaising directly with SPR to understand as much as possible about its proposed cable route corridor. This is so that NGV can identify any opportunities for joint working and minimise any disruption. In some places, Nautilus may need to cross the cables for EA1N and EA2.

Whilst SPR has already selected its preferred route, Nautilus does not yet have a defined cable route (for either DC or AC cables), and it must undertake its own detailed environmental and technical assessment to progress its project routing and siting options. National Grid Ventures (NGV) will work to minimise impacts on local communities and the environment where possible and will liaise and consult with communities and stakeholders when the project is ready to discuss the proposed cable route options.

Landfall

Will there be any visible equipment at the landfall site?

Landfall is where the subsea cables are brought onto the land and are connected to the onshore cables. As all the cables will be buried underground at the landfall site, very little will be visible once works are completed, although there may be some relatively small-scale equipment visible above ground. A kiosk type structure (similar to a telephone exchange) may be required at the landfall location to boost the signal for the subsea fibre optic communication system. It is too early to confirm if this would be required at this stage.

Cable joint bays will need to be made at sections along the route during installation. Cable joint bays will be buried for the HVDC cables and will likely require a man hole cover for operations and maintenance access, these manhole covers may require fencing. The man hole covers would be visible above ground. Joint bays on the HVAC cables will require above ground link boxes (see typical AC cable construction figure on page 7).

Converter station

How big is the converter station for Nautilus Interconnector?

Nautilus Interconnector is at the very early stages of development. The design for the converter station has not yet been developed. A typical footprint for a converter station covers an area of five hectares (12 acres) with a maximum height of 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

NGV is constantly challenging its supply chain to bring down the size of converters. The final design of the converter station will be developed through a thorough consultation process with stakeholders and the local community, as well as through collaboration with the supply chain.

Why does the converter station need to be within 5 km of the substation?

The search radius for the converter station site is limited to 5 km because beyond this distance NGV would need to increase the size of the converter station building. Locating the converter station further away from the substation has an impact on the voltage level needed to transmit the power, thereby requiring additional equipment to be installed at the converter station to maintain the required voltage level.

Can the converter station be buried?

There are a number of environmental, technical and cost factors which must be considered when designing the converter station, and partially or entirely burying the building presents significant challenges relating to keeping the building free from water and moisture.

NGV is constantly challenging its supply chain to consider, develop and review innovative engineering and design techniques. Further work is being undertaken to assess the feasibility of burying converter stations. Site specific constraints and safety will also have an impact on the feasibility of burying a converter station. Converter stations have not previously been buried due to concerns over water ingress into buildings accommodating electrical infrastructure, concerns over the effectiveness of fire-fighting and ventilation systems, and the additional associated costs. NGV would be required to undertake a cost benefit analysis to assess additional cost against potential benefits in order to meet Ofgem requirements.

The final design of the converter station will be consulted on with the community in detail before submitting any application for development consent. This will include the opportunity to provide feedback on items such as visual appearance and landscaping.

Will the converter station be noisy?

The converter station will be designed to minimise noise. Noise modelling assessments will be undertaken as part of the EIA process. Noise levels will be consulted on with environmental health bodies and the local authority to ensure that any noise does not exceed unacceptable levels.

Environment

How will the impact on the environment be considered?

NGV will be undertaking an EIA process to ensure that matters relating to the environment are considered when developing the proposals for Nautilus Interconnector. EIA is a legal requirement for some developments and is strictly regulated. A wide range of environmental subjects will be taken into consideration including traffic, landscape and visual impact and ecology. The results of these assessments will be consulted on in a Preliminary Environmental Information Report (PEIR), before being refined and submitted in an Environmental Statement (ES) which will form part of the DCO application.

Project timeframes

What work will Nautilus be undertaking in 2020?

Between March 2019 and March 2020, the Nautilus team has met with a variety of local groups, statutory and non-statutory bodies, as well as district, county, town and parish councils. This early stage of engagement has been focused on introducing the Nautilus proposals, including the onshore and offshore components, and the work necessary to understand the viability of developing Nautilus in East Suffolk.

Further environmental and technical assessment is now required to progress the initial desktop work for the onshore and offshore components of Nautilus. Over the course of 2020, the team intend to undertake surveys¹ in the area to gather additional information. This is required to more accurately assess project feasibility.

The team are conscious of the interest and resource input from both stakeholders and the community in the pending SPR Examinations for EA1N and EA2 offshore wind farms and EDF's submission of the Sizewell C application for development consent. NGV is registered as an Interested Party in these Examinations and will be participating as appropriate.

When will the project be completed?

Nautilus Interconnector is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision by NGV for the project is planned for 2024. Following this, construction will commence, and the project could be operational by 2028.

What does Brexit mean for Nautilus Interconnector?

NGV is undertaken a thorough analysis of potential risks relating to Brexit, and the results of this analysis highlight that electricity Interconnectors will be able to operate post-Brexit under any outcome.

NGV is confident that the energy markets in the UK, France, the Netherlands, Belgium and Norway will continue to operate as they do now. NGV Interconnectors will continue to have the right export and import power to and from those markets.

COVID-19 update

Nautilus Interconnector in the context of COVID-19

In light of current Government restrictions and as new advice is issued, NGV has, and continues to, review activities on Nautilus to ensure the team are working safely and adhering to government advice. NGV is continuing to progress with its current work while maintaining the safety of its staff. Should you have any questions relating to the project during this period, the contact details at the bottom of this document remain active.



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Nautilus Interconnector

Briefing Pack

July 2019

Introduction

Nautilus Interconnector is a proposed second Interconnector between Great Britain and Belgium, including cabling works and a converter station situated in East Suffolk.

When built, it will create a new 1.4 gigawatts (GW) high voltage direct current (HVDC) electricity link between the transmission systems of Great Britain and Belgium.

This will carry enough electricity to supply around 1.4 million homes.

Who we are

Proposals for Nautilus Interconnector (Nautilus) are being developed by National Grid Interconnector Holdings (NGIH) and joint venture partner Elia.

NGIH is a wholly owned subsidiary of National Grid Group and is legally separate from National Grid Electricity Transmission Plc (NGET). Elia is Belgium's transmission system operator, operating the high voltage electricity network in Belgium¹. It also is a key player in the energy market and the interconnected electricity system.

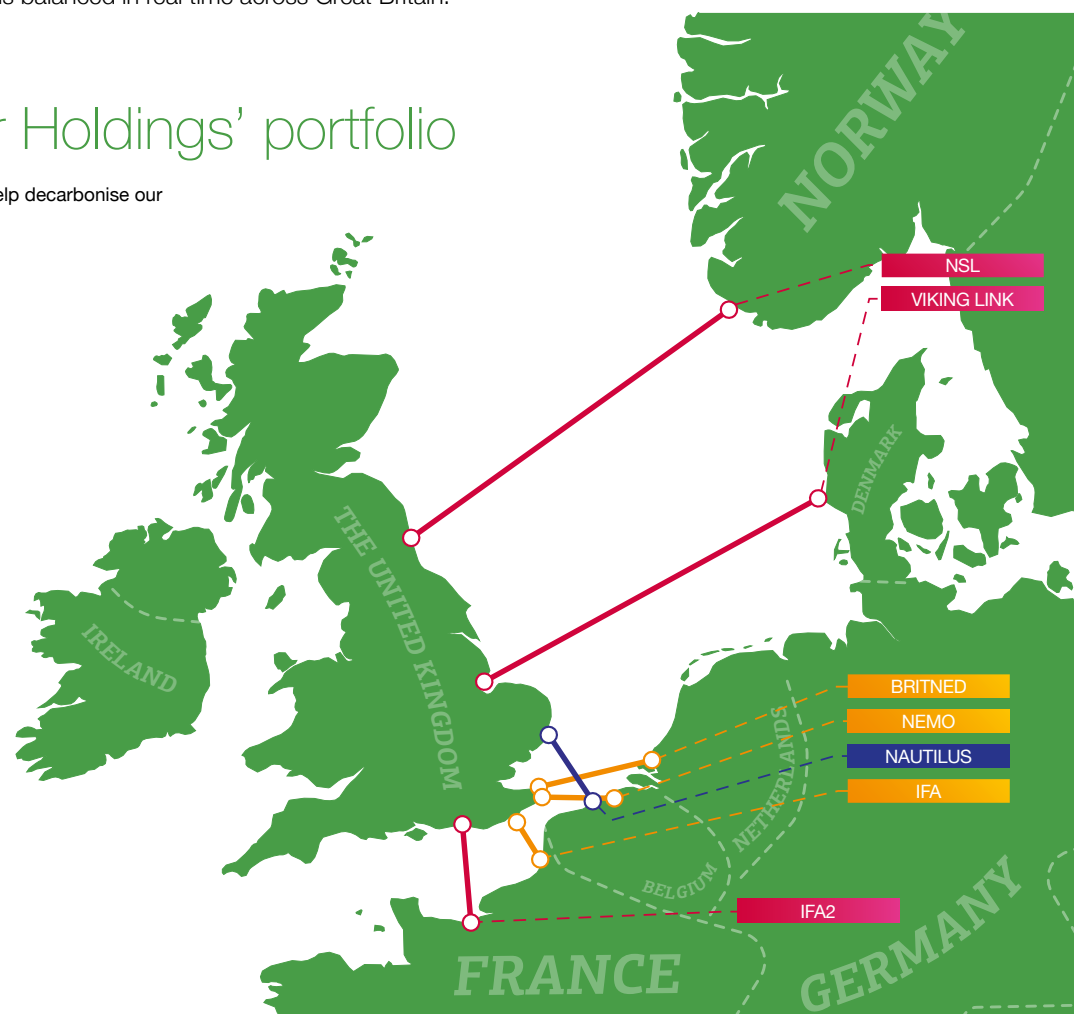
NGET is responsible for ensuring electricity is transported safely and efficiently from where it is produced; reaching homes and businesses safely, reliably and efficiently. National Grid is also the Systems Operator. The Electricity Systems Operator (ESO) now operates as a separate company within National Grid effective from 1 April 2019. It is responsible for making sure supply and demand of electricity is balanced in real time across Great Britain.

National Grid Interconnector Holdings' portfolio

Interconnectors are the perfect tool to help decarbonise our energy system.

- Operational
- Under construction
- Under development

Project:	Go-live date:
IFA	1986
BritNed	2011
Nemo	2019
IFA2	2020
NSL	2021
Viking Link	2023
Nautilus	2028



¹ Elia System Operator is listed on Euronext Brussels and is part of the BEL Mid-index. Its core shareholder is Publi-T. Elia System Operator has been listed on the regulated market of Euronext Brussels, since June 2005.

Connecting for a cleaner future

Interconnectors are making energy more secure, affordable and sustainable for consumers.

These projects have helped to lower electricity prices, increase the security of supply and stabilise energy in the Great Britain transmission network.

Interconnectors are the perfect tool to help decarbonise our energy system. So far this year it is estimated that almost 65% of electricity coming into Britain through National Grid's Interconnectors comes from zero carbon sources. It is expected that this figure will reach 90% by 2030.

They also help to strengthen security of supply, by providing access to a much larger and more diverse mix of generation.

Reducing our reliance on energy from fossil fuels

The transition to a low-carbon energy system is necessary to avoid the catastrophic effects of climate change.

The UK's climate change ambitions are among the highest in Europe. To achieve these goals, the UK needs to improve cross-border electricity Interconnections so that reliable, sustainable energy can be imported to the British energy network at times when UK renewable energy generation is limited.

Connecting the UK with Europe's electricity systems will allow the UK to boost its security of electricity supply and to integrate more renewables into energy markets.

Nautilus will help to increase efficiency across Europe and reduce reliance upon oil and gas imports by providing 1.4 GW of flexible capacity between the British and Belgian networks.

Keeping the lights on in low-carbon Britain

Renewable sources of generation are crucial to helping the UK achieve its legally binding climate change targets, but they also provide challenges for managing the complexity of the future electricity system.

This, along with other Interconnectors will give UK system operators the critical tools they need to balance rapid changes in supply and demand – helping to smooth hourly variations in production from wind and solar farms in the UK.

Nautilus will increase security of supply by ensuring energy flows between Britain and Belgium from where it is being generated in large quantities to where it is needed most.

Providing access to affordable energy for consumers

Interconnectors make the market more economically efficient, by ensuring everyone has access to the lowest priced electricity available.

Nautilus will provide access to 1.4 GW of electricity so that when the market is tight in the UK, but there is surplus wind or sun in Belgium, it is possible to import power from these less expensive generation resources.

As more Interconnectors help to bring down wholesale prices, consumers will benefit from lower bills.

Nautilus will provide access to more affordable energy for British consumers.



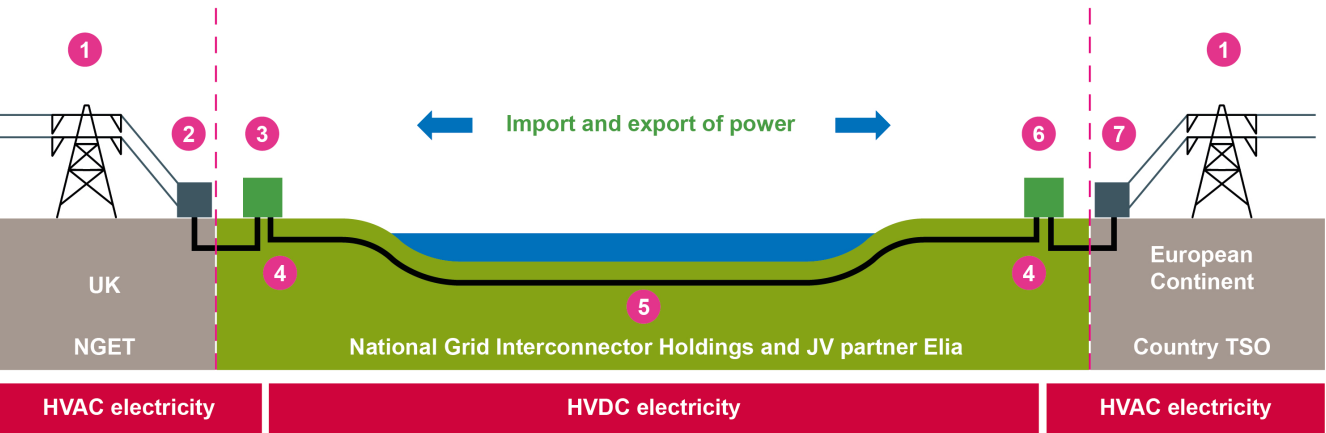
Nautilus Interconnector

National Grid Interconnector Holdings is proposing to develop Nautilus, a second Interconnector between Belgium and Great Britain, to provide a 1.4 GW HVDC electricity link between the two countries.

Electricity provided by Nautilus will be transported under the North Sea via underground subsea cables which will be buried onshore at a point known as ‘landfall’ before connecting into an onshore converter station and the national grid. Potential high level cable route options and various landfalls along the East Suffolk Coast are currently being assessed for Nautilus.

In order to connect Nautilus to the national grid, discussions have been ongoing with National Grid Electricity Transmission (NGET) and the System Operator. From this, NGET have provided a Connection Agreement to use a new 400 kilovolts (kV) substation provisionally referred to as “Leiston 400kV substation”. This is the same substation that Scottish Power Renewables (SPR) offshore windfarms East Anglia 1N and 2 are proposed to be linked to. NGIH, SPR and NGET are currently working on the premise that all projects will be connecting to the same substation – “Leiston 400kV substation”.

Nautilus is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision is planned for 2024. Following this, construction will commence, and the project could be operational by 2028.



HVAC = High Voltage Alternating Current HVDC = High Voltage Direct Current TSO = Transmission System Operator

- 1. Existing network
- 2. NGET onshore substation
- 3. National Grid Interconnectors onshore converter station
- 4. Underground HVAC/HVDC cables
- 5. Subsea HVDC cables
- 6. Elia onshore converter station
- 7. Belgian transmission network substation

Key benefits



Enough power for 1.4 million homes



1.4 gigawatts (GW) of secure, sustainable energy for British consumers



More Interconnectors help the transition to a zero carbon future

Design

The design for the converter station has not yet been developed. A typical operational footprint for a converter station covers an area of five hectares (12 acres) with a maximum height of 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

The business is constantly challenging its supply chain to bring down the size of converters. The final design of the converter station will be developed through a thorough consultation process with stakeholders and the local community, as well as through collaboration with the supply chain.

The development process

For the purposes of the development process, Nautilus has been classified as a Nationally Significant Infrastructure Project (NSIP) in the UK and a Project of Common Interest (PCI) in Europe.

NSIP classification

Confirmation has been received from the Secretary of State for Business, Energy and Industrial Strategy (BEIS) that Nautilus will be treated as an NSIP and as development requiring a Development Consent Order (DCO). This means that the final decision-maker for the project will be the Secretary of State.

The DCO regime requires a robust Environmental Impact Assessment and consultation process prior to any application being submitted. The DCO consent process will provide a single, unified consenting process with clear and fixed timescales.

It is anticipated that a DCO application will be submitted in 2022. Prior to this a series of public and statutory consultations will be undertaken for Nautilus. Once the Planning Inspectorate have received the DCO application, they will consider whether to accept it for Examination. To be accepted, PINS will need to be satisfied that the pre-application consultation, both with statutory consultees (such as the local planning authorities and Natural England) and local communities, has been undertaken.

To help demonstrate this to the Planning Inspectorate, a Consultation Report will be submitted alongside the DCO application, outlining how the consultation process has been carried out in accordance with the Planning Act 2008. This report will contain details of the consultation methodology and the feedback submitted in response to the consultation. Explanations will also be provided as to how feedback has influenced the proposals.

If the application is accepted, it will enter a six-month Examination period. During the Examination, either a single inspector, or a panel of inspectors appointed by the Planning Inspectorate, will evaluate the application and ask questions of the applicant and of statutory consultees. The inspector(s) will also consider the representations of all stakeholders who have made valid representations.

Following the Planning Inspectorate's Examination, there will be a determination of the application by the Secretary of State. If the application is approved, the DCO will be granted and given authorisation to begin construction and operation of Nautilus.

What is a Project of Common Interest (PCI)?

PCIs are key cross border infrastructure projects that link the energy systems of countries in Europe. They are intended to help Europe achieve its energy and climate objectives: affordable, secure and sustainable energy for all citizens. In the long-term, PCIs are also aimed at realising the decarbonisation of the economy in accordance with the Paris Agreement signed by the UK, which aims to achieve climate neutrality by the end of the century.

In the case of Nautilus Interconnector, the project has been identified as a PCI due to its significant impact on the energy market and market integration between the UK and Belgium. The project will boost competition in the energy market, achieve energy security from a more diverse supply and contribute to our climate and energy goals. The selection process for PCI projects is determined by the Trans-European Networks for Energy (TEN-E) Regulation, which will be complied with throughout the development process for Nautilus.

Environmental Impact Assessment process

In parallel to the public consultation we will be undertaking extensive environmental surveys and studies and consulting with a range of statutory stakeholders.

Scoping Report

A Scoping Report will be submitted to the Planning Inspectorate. This will present the development proposals and will describe how we will assess any potential impacts to the existing environment. The feedback received on this document from the local planning authorities and statutory consultees will result in a Scoping Opinion from the Planning Inspectorate, which will be made publicly available.

Preliminary Environmental Information Report (PEIR)

The PEIR will build upon the findings from the earlier scoping documents, as well as the feedback received through consultation. It will incorporate the findings of the surveys and environmental assessments that have been carried out. This will enable consultees to develop an informed view of the potential impacts Nautilus may have on the local environment.

Environmental Statement (ES)

The ES will advance the content of the PEIR and will incorporate the responses from the consultation and results of the surveys undertaken. It will also describe any changes to the project and any mitigation measures proposed to be implemented. The ES will form part of the DCO application for submission.

Copies of these reports will be made available during the public consultation. Options and ideas will be presented to consultees and environmental authorities as the proposals develop to understand the best approach chosen for the final proposals.

Indicative Timeline*



*Please note, all dates are indicative and subject to change.

Contact us

Please don't hesitate to get in touch if you would like to find out more information about Nautilus Interconnector.

You can contact a member of our Community Relations Team to find out more by using the details below.



Write to us at:

Freepost Nautilus Interconnector



Email us at:

info@nautilusinterconnector.com



Call our Freephone information line:

08081 699 822



For more information about our Interconnectors please visit:

www.nationalgrid.com/interconnectors

www.nationalgridcleanenergy.com

BLAXHALL PARISH COUNCIL



Chairman: Cllr Graham Bowles

Parish Clerk: Joanne Peters, [REDACTED]

Freepost SZC Consultation

18th December 2020

Dear Sirs,

Blaxhall Parish Council response to Sizewell C Stage 5 Public Consultation

Blaxhall Parish Council are keen for a beach landing facility but insists that the negative impacts relating to this are provided as these have never been explained.

Blaxhall Parish Council are keen for a sea and an improved rail led delivery service but wish for the negative impacts especially to the environmental impact to be provided.

Blaxhall Parish Council feel that a survey on the impacts of light pollution should be carried out.

Blaxhall Parish Council feel that EDF Energy are ignoring the views of the public and are putting a pretence of consultation but are not properly listening. The level of accurate and verified information being supplied by EDF Energy continues to be very poor.

I trust that you will take the above comments into consideration.

Yours faithfully,

[REDACTED] [REDACTED]

Clerk to Blaxhall Parish Council



Suffolk Coast Acting for Resilience response to EDF Fifth Consultation on Sizewell C

SCAR is a strategic partnership of organisations and individuals of all political persuasions representing groups on the Suffolk coastline.

The aim of SCAR is to preserve and protect, for future generations, the Suffolk coastline, tidal rivers and surrounding land area.

SCAR takes no stand for or against the principle of nuclear power, or of the principle that the coast in general or the Sizewell site in particular can be an appropriate location.

At no stage in any previous consultation has EDF been transparent and open with its proposals nor has sufficient detail been provided to properly assess the impact of the proposals on the coast. This consultation is no exception and continues to seek responses to questions with only vague details provided.

Some of the proposals being consulted upon appear to be no more than ideas that EDF might pursue. As we have commented before, EDF gives the impression that it has yet to decide how it will defend the development against flooding and how it will provide marine access for deliveries. No thought appears to have been given to the environmental impact of these latest ideas upon the marine environment or the coast. It is not even possible to tell where the various features are precisely located, or what their potential form and scale may take.

Our concerns derive directly from the decision to include a massive increase in the height, and hence the size and extent of the HCDF. No significant justification for that has been provided.

As far as it can currently be understood the proposal is simply dismissive of all effects on the coast elsewhere – wholly just the “nuclear island” concept. That is, in principle, an unacceptable concept for the design of SZC on what is a fragile, mobile and eroding coast.

Hence, as of this fifth “Consultation”, we know less about a more damaging “proposal” than at any point since the first consultation stage in 2012.. It follows therefore, that, in respect of the coastal management and consequential environmental issues, these proposed changes are unacceptable given the complete lack of environmental impact assessment, spatial context of the changes and consequences both north and south of the development.

Accordingly, should no further or different information become available and these changes were translated into DCO changes, SCAR would object to the DCO being granted.

Specifically we make the following observations:

- The Hard Coast Defence Feature (HCDF) design was not finalised in the DCO submission.
- The HCDF design is not finalised in this consultation nor any consultation that preceded this.
 - The HCDF is being raised first by 3.8m and extended at least 8m further to seaward and raised again in 2046 by a further 1.0m requiring further extension seaward.
 - However, the design remains incomplete and it appears to us that the toe of the defence is initially too shallow (at AOD) and with adaptation will extend significantly further seaward and go deeper in order to complete a viable design.
 - Its final depth is not given and consequently the additional eastward extension not clear.
 - The only possible conclusion to draw is that the impact upon coastal forces will be greater, earlier and more uncertain than supposed in the DCO submission.
- It is fundamental that the HCDF design be concluded at the earliest opportunity and that we, statutory consultees and the general public should be given the opportunity to review and comment once details are available.
- One of the consequences will be an earlier loss of the Soft Coast Defence Feature. This will put an even greater onus on the Monitoring and Maintenance Plan and it is also fundamentally essential that details of this should be put to the public as soon as possible.
- The new proposal may lead to accretion of shingle to the north of SZC. However, at the same time, the early loss of the SCDF will lead to the loss of sediment transfer to the south with very adverse consequences for properties and the communities to the south. A full assessment must be made of the potential for this to happen beyond the confines of “Greater Sizewell Bay” as far south as Aldeburgh.
- Regarding the proposed options for a second temporary BLF, we would support the principle that this be a minimally piled jetty, limiting any potential effects on tidal flows and sediment transport to the south. We consider option 4 as the “least worst”, as suggested in conversations with Coastal Partnership East, as:
 - a) Having the least likely negative effects on the critical nearshore coastal processes, and
 - b) Yielding the greatest improvement in the modal split of aggregates and other bulk movement to or from the site, with resulting in fewer intrusive HGV movements on the road network.

From: [REDACTED]@suffolk.gov.uk
Sent: 19/12/2020 10:56:54
To: sizewell@edfconsultation.info
CC: SizewellC@planninginspectorate.gov.uk
Subject: EDF 5th Submission response
Body:

Cllr Stephen Burroughes

[REDACTED]

Date: 18.12.20

Comments:

- Whilst I understand the need for a mix of energy production to service the growing energy requirements of UK, the issues of viability in terms of investment return is questionable. Renewables, as far as I understand it, now attract no government subsidy, resulting in a significantly lower cost thus making nuclear extremely expensive to deliver.
- Freight Movement - This is not fully explained and the criteria used is not evidenced.
- Rail Movements - the impact of movements by rail at night are not acceptable with increased disturbance and vibration to nearby property. A comprehensive strategic plan between rail, road & marine led approach would be more appropriate and provide greater flexibility.
- Permanent Beach Landing Facility – difficult to comment on as not qualified to do so.
- Impact on the environment needs to be carefully managed with appropriate mitigation.
- Road Network – As the A12 is a strategic link both in terms of economic, residential & tourist growth, this requires significant upgrading and improvement to cope with increased demand, particularly around the 4 villages including Marlesford, Little Glemham etc. To re-trunk would be key.
- Construction – more forensic management criteria & data needs to be made available to deliver a robust build framework.
- Southern Park & Ride – additional measures in line with SCC approach.

Although brief, my comments support the line taken by a more comprehensive response via Suffolk County Council, and the views and comments I have expressed are my own and not representative of the councils.

Cllr Stephen Burroughes
Member for the Framlingham Division
Suffolk County Council

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SUDBOURNE PARISH COUNCIL



Chairman: Cllr David Robinson

Parish Clerk: Joanne Peters,

FREEPOST SZC Consultation

18th December 2020

Dear Sirs,

RE: SUDBOURNE PARISH COUNCIL – SIZEWELL C STAGE 5 CONSULTATION RESPONSE

Thank you for the opportunity for Sudbourne Parish Council (SPC) to respond to the most recent Sizewell C public consultation. The Parish Council's observations are as follows:

1. SPC wishes to highlight its concern over how short the consultation period has been run especially in a period of Corona virus and question why there are so many potential options and changes raised at this stage of the DCO process.
2. SPC is unable to provide a more comprehensive response as there is a lack of detail in many areas in the documentation and that EDF seems to be uncertain about the viability of different options proposed e.g. the array of Beach Landing Facilities. The Parish Council would like a clear definitive plan on which to respond.
3. The recognition by EDF of the need to reduce the numbers of HGV movements is welcomed, however, there is still concern about how the volume and movement of HGVs (plus light goods vehicles, cars and buses) will be managed. It is anticipated that there will be a significant increase in A12 traffic as well as on local B roads. The Parish Council is particularly worried about the anticipated impact on; local businesses, the life of local residents and their access to hospitals / health care.
4. The potential increase in the number of trains was noted but there is a lack of clarity on the impact on road congestion especially in Melton and potential consequences for the current rail passenger services.
5. Sudbourne supports other local communities who are worried about the impact of vibration and noise from the proposed increase in rail traffic particularly during the night.
6. The Parish Council insists the need for a robust, independent, accountable monitoring and mitigation system in place before any work by EDF commences.

The main points/concerns raised by SPC in respect of the Stage 4 Consultation submission are still relevant and valid.

We trust that you will take the above comments into consideration.

Yours sincerely,

[Redacted Signature]

Clerk to Sudbourne Parish Council

Response of Marlesford Parish Council to EDF Energy's Sizewell C Consultation on Proposed Changes (November-December 2020)



**Lord Marlesford
Chairman
Marlesford Parish Council**

**Melanie Thurston
Parish Clerk**

18th December 2020

1. Introduction.

This is the response of Marlesford Parish Council (MPC) to EDF Energy's Sizewell C "Consultation on Proposed Changes".

On 18th November 2020 NNB Generation Company (SZC) Limited (EDF) issued a series of further proposals for consultation having received consent from the Planning Inspectorate (PINS) to do so. This followed EDF's submission of the DCO application on 27th May 2020. EDF's new proposals postdate the deadline for Relevant Representations to PINS. The proposals which are set out in the document "Consultation on Proposed Changes" are welcome if they can bring about a reduction in HGV traffic and lessen the impact of EDF's Sizewell C (SZC) project on the environment and the local population. What are contained in the consultation document are proposals and there is no certainty around EDF's ability to deliver measures that would produce the best outcomes for East Suffolk. As stated in its Stage 4 consultation response, MPC remains opposed to EDF's plans as submitted and will not review that position until EDF submits its further application in January 2021.

Whilst the proposals contain a change to the landscaping of the Southern Park and Ride (SP&R) and there is the prospect of some reduction in HGV traffic using the A12, our concerns remain as stated in the MPC responses to all previous consultations, namely:

- The inappropriate nature of the current site of the SP&R
- Proximity of SP&R to Hacheston and Marlesford villages and the impact of noise and light pollution from it
- 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 adding to the danger for pedestrians crossing the A12 in Marlesford in order to reach services such as shops and bus stops
- 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

Wider concerns about the SZC project are (inter alia):

- The general detrimental impact on the natural environment and the specific, potentially detrimental, effects on the RSPB nature reserve at Minsmere and a lack of recognition of the importance of the Suffolk Coast and Heaths AONB.
- MPC was disappointed that at Stage 3 & 4 consultations, EDF made clear that wider use of marine-led freight options has been abandoned and that the rail-led option appeared unlikely to be delivered. We therefore welcome EDF's new attempts to find ways of increasing marine and rail freight, always subject to full environmental evaluation.

- A feeling that the Sizewell site is far too constrained for the works that are being proposed to deliver Sizewell C and D
- Albeit late in the day, EDF's proposals for enhancing sea defences to give greater protection against sea-level rise as a result of climate change are welcomed, but we await the detail that will be contained in the January 2021 application

MPC remain willing to engage with EDF on all of these issues.

2. The Consultation

EDF carried out a fourth round of consultation over the summer of 2019 and responses were submitted by 27th September 2019. In the introduction to that consultation, Jim Crawford, the then Sizewell C Project Development Director, stated *"Consultation has been central to the way in which the Sizewell C proposals have evolved and the feedback we have received has been invaluable in shaping our proposals. We have continued to update and improve them with the benefit of that feedback and continued environmental and technical studies. Before we finalise our application, we are seeking your views on a number of potential changes which we think may improve the proposals further."*

Whilst MPC had doubts about the wholehearted commitment of EDF to the consultation process, we believed, after the close of the consultation period, that EDF would have taken on board the detailed comments that had been made by county, district and parish councils, statutory and other interested bodies, MPs and many private individuals at Stage 4 and in the earlier consultation rounds.

Many key aspects raised in consultation failed to make it into the DCO which was submitted to the Planning Inspectorate (PINS) on 27th May 2020. It should therefore have come as no surprise to EDF that the overwhelming majority of the 1,200+ Relevant Representations submitted to PINS referred to concerns voiced at consultation, but not addressed in the DCO. Areas of particular concern raised in the Relevant Representations included:

- Freight strategy and especially the lack of emphasis on sea and rail as potential major modes for construction material transport
- The continued emphasis on use of roads for freight transport
- Ongoing concerns about environmental impacts
- Questioning of the adequacy of sea defence provision at the main site
- Concerns over the proposed new infrastructure such as the Sizewell Link Road and Two Village Bypass.

All these issues have been consistently flagged as areas of great concern to the local community, so it was something of a surprise that only six days after the closing date for Relevant Representations, (and before they were published on the PINS website), EDF in its letter of 6th October to PINS, requested leave to make changes to the DCO application. The timing suggests that EDF had already realised that they had failed to adequately address local concerns but chose in the consultation published on November 18th 2020, to hide behind the fig leaf of "continuing to consult". At paragraph 1.1.5 in the new consultation document, EDF says:

“Since submission we have continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public to gather their responses to the Application. We have also been working with our contractors to develop our proposals to the next level of detail in preparation for implementation, in the event that DCO consent is granted. As a result, we have identified potential opportunities to further minimise impacts on the local area and environment in many cases and potential changes which will assist with the efficient construction of the project”.

MPC regards this statement as disingenuous because this Parish Council has raised its concerns many times on a number of the issues now out for consultation, and it is aware that others, including the County Council have made their own opposition and fears well known. We consider that it is late in the day for EDF to be addressing the issues.

MPC does however give a cautious welcome to some of the proposals put forward by EDF and it will detail below where it can support the proposals and on what issues it continues to have concerns. We maintain our opposition to EDF’s plans as they stand and will continue with that stance until we see the detail contained in EDF’s additional application in January 2021.

3. Proposals for the Southern Park and Ride

a. General Opposition to the Siting of the Southern Park and Ride

As we stated in our Stage 3 & 4 responses, we remain opposed to EDF’s proposals for the SP&R at Wickham Market (Hacheston). This is on the basis that:

- i) The SP&R itself presents a very significant visual and environmental intrusion in an otherwise rural and agricultural landscape
- ii) The DCO fails to adequately address the elevation in traffic volume travelling to and from the SP&R 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.
- iii) The DCO contained no substantive proposals for the mitigation of traffic impacts in Wickham Market. We welcome EDF’s subsequent detailed engagement on proposals to mitigate the impact of traffic travelling to and from the SP&R using the B1078 through Wickham Market. However, even the best possible mitigation will be unable to remove the potential for severe traffic congestion in the village. This remains a concern for many Marlesford residents who visit Wickham Market for day-to-day shopping and to use other essential services.
- iv) We refer EDF to the other arguments presented in our responses to Stages 3 & 4 consultations - all of which still stand.

b. Changes to North West Landscape Bund

At Stages 2, 3 & 4, all masterplans for the SP&R showed a continuous bund along the north-west boundary of the site. MPC therefore believed that this feature was embedded in EDF’s plans, so we were surprised and concerned that the bund was shortened by approximately 50% of its length in the masterplan submitted with the DCO. We welcome the bund’s reinstatement, but question how and why it was shortened in the first place.

c. Other Changes

- i. The reduction in the Order Limits is noted, but it makes no material difference to the overall impact of the scheme on the surrounding area.
- ii. At paragraph 5.2.11 of the new consultation, it is stated that *“Other minor design changes, including additional landscaping and accommodation works, are also being explored by SZC Co.”* It is hoped that this is a reference to the matters currently under discussion between EDF and the parishes surrounding the SP&R.

d. Remaining Concerns

- i. MPC continues to believe that the Martlesham Park and Ride could be used as an additional facility. This location would allow traffic to be captured further south on the A12 and should therefore make a contribution to reducing traffic in the already congested area around Woodbridge and would allow a reduction in size and capacity of the proposed SP&R site. **We again ask EDF to liaise with the appropriate local authorities to bring the Martlesham Park and Ride into use for the construction phase of SZC.**
- ii. The elevated position (DCO Application Documents, Book 6, 6.5, Volume 4, Chapter 6, paragraph 6.4.12) of the SP&R makes the site an inappropriate one and is the reason that we have opposed its location. The site is located between the two Special Landscape Areas of the Rivers Deben and Ore (Policy AP13 Special Landscape Areas, Suffolk Coastal Local Plan, Saved Policies July 2013). That policy states that “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”, we contend that the development of the SP&R in this location will detract from the quality of the landscape. The landscape issues raised directly with EDF have not been taken into account in this latest consultation. **We urge EDF to continue their engagement with the local parishes in order to achieve the best possible mitigation for the adverse visual impact of the site if it is consented.**
- iii. There are significant visual impacts that do not appear to have been fully considered in the DCO and are not addressed in this consultation. We would expect our concerns raised directly with EDF regarding old and new hedgerows and existing specimen trees to be addressed.
- iv. The construction start date for the SP&R is scheduled for Year 2 of the project. We believe it should be started in Year 1 to ensure the earliest and maximum capture of A12 SZC traffic.
- v. As part of EDF’s noise and air quality mitigation we will press for EDF’s contractors to use electric buses.
- vi. Marlesford is a “dark skies” area. We will argue that EDF must mitigate the illumination of the SP&R site to ensure that dark skies are protected.

vii. We believe that the landscape treatment of the SP&R needs to address the enhancement of the wider landscape and the mitigation of the landscape and visual impacts of the SP&R itself. EDF should facilitate the delivery of a long-term legacy of landscape improvements (with hedges, trees, and woodlands) secured within the area to remain, (following removal of the facility and the final return of the area to its current agricultural use). We would ask that:

- Provision of new hedgerows and/or woodland planting on all site boundaries (including the cross field northern boundary) where there is no existing vegetation.
- Provision of new hedgerow trees (to give height) where there are already hedgerows (as on the east boundaries);
- Space provided for suitable landscape mitigation, as above and mounding on the west boundary where there are open views towards the site;
- We support the provision of soiled mounds to provide visual mitigation;
- Wider landscape enhancement of the B1078 from the roundabout to the site.
- The DCO proposals for the SP&R include surface water drainage and open swales. MPC has previously asked for further details and until these are received, it cannot make a judgement on the effectiveness of the drainage proposals.

4. Freight Management Strategy

a. Previous Consultations

MPC draws EDF's attention to the fact that in its Stage 3 & 4 responses to consultation the Parish Council urged EDF to go further and exploit the marine and rail freight opportunities more fully. We were not alone in this. Suffolk County Council (SCC) and Suffolk Coastal District Council (now East Suffolk Council (ESC)) in their joint response to Stage 3 consultation at paragraph 5 opposed *"The dropping of a marine-led materials transport strategy with the introduction of a road-led strategy alongside the alternative of a rail-led option. The Councils continue to support marine-led and rail-led transport strategies and have not yet seen convincing evidence that a marine-led strategy is not feasible or environmentally preferable. If the marine-led option is proven to be impossible, the Councils wish to see the rail-led strategy implemented (in accordance with National Policy Statement (NPS) EN-1 paragraph 5.13.10. The Councils are not content with a road-led option, with the significant number of additional Heavy Goods Vehicles (HGVs) resulting in a detrimental effect on Suffolk's road network."*

And again, in their Stage 4 response, at paragraph 12, SCC stated *"As highlighted in the joint Stage 3 response, this Council expects EDF Energy to use a deliverable sustainable transport strategy to transport materials to/from the site. Unless there is strong appropriate evidence and justification, deviation away from a sustainable transport strategy should be considered to be unacceptable and this Council continues to expect maximising the use of marine- and rail-based transport to transport materials to/from the site. This Council is disappointed that Stage 4 suggests that the lack of progress on the rail-led strategy is now jeopardising delivery of this option."*

It is therefore extraordinary that EDF in the November 2020 Consultation on Proposed Changes at paragraph 2.2.6 state, *“Since the submission of the Application a number of stakeholders have urged that every effort should be made to maximise the use of rail and sea transport and thereby reduce HGV movements. At the same time SZC Co.’s project and contractor teams have continued to investigate ways to enhance the capacity for sustainable freight transport”*.

It is completely wrong to claim that “since the submission.....” stakeholders have requested that more use is made of rail and sea. Those requests have been voiced since Stage 2 in 2016 and with increasing vigour ever since. There is now a feeling that a rushed set of proposals has been assembled at breakneck speed in order to allow submission just ahead of the start of the DCO process. If this is the wrong interpretation and these are considered proposals, why were they not included in the original DCO application?

b. Increase in the Frequency of Freight Train Movements

- i. MPC welcomes the potential increased use of rail by increasing the number of trains per day and by considering accepting trains six days a week. The Parish Council supports this option on the basis that it has the potential, in the best-case scenario, to reduce HGV movements by up to 243 per day on a 4 train/6 day per week model (Table 3.3 pg 33).
- ii. The Parish Council’s support is given subject to EDF taking all the appropriate mitigation measures to minimise adverse impacts to other users of the rail network and residents along the route of the railway.

c. Enhanced Beach Landing Facilities

- i. MPC has long called for the greater use of sea-borne freight. We have welcomed the fact that the permanent beach landing facility (BLF) would be able to take delivery of abnormal indivisible loads (AILs), thus removing them from the road network, but we have argued that EDF should have gone further.
- ii. At Stage 3 consultation EDF stated at paragraph 5.1.6 Vol. 1 *“A marine-led strategy has been considered in which a significant proportion of construction materials would be delivered by sea. However, following further study, EDF Energy has concluded that this is not feasible due to the impacts on marine ecology of constructing the jetty. Measures to reduce this impact would significantly increase the overall time taken to construct the power station, would not fully address those impacts and would not meet the “urgent” need for new nuclear power identified by Government in the National Policy Statement (NPS) (Ref. 5.1, Ref. 5.2).”* We question what new information is now available to EDF that has enable them to contemplate a change to the marine delivery option?
- iii. We support the proposal in Consultation on Proposed Changes for Option 4, (the temporary BLF – Long Pier), as it should provide the greatest capacity for sea-borne deliveries of construction materials. We are very aware of the potential for impacts to the marine environment and would want to see those impacts minimised, but we believe, (provided it is possible to deliver the Long Pier option within current environmental regulations), that it is beneficial to reduce, as far as

possible, the HGV traffic adverse impacts on the communities along the HGV routes.

- iv. In combination, if the maximum use of rail and marine freight can be achieved, it would appear to contribute to a 300 per day reduction in HGV numbers. If this can be delivered it is welcome, but at least 700 HGV movements per day will remain and these will have adverse impacts on residents living along the A12 in terms of air quality, noise and vibration. MPC again calls on EDF to ensure that all HGV deliveries, as a minimum, use Euro VI emission vehicles and to provide comprehensive mitigation along the A12 in Marlesford and Little Glemham, pending the delivery of a Four Village Bypass.
- v. We would like to see more clarity on the calculation of the benefits of increasing rail and marine freight in terms of the reduction in HGVs. There seems to be an inconsistency between the numbers set out at paragraph 3.2.5 and the numbers contained in Table 3.4. This needs to be further explained and set out more clearly.
- vi. We note that no reference is made to the potential for shipments of construction materials to be brought in via Lowestoft port. We believe that this is an option worth exploring and one that would bring valuable employment opportunities to a recognised deprived area and would reduce the volume of HGV traffic travelling to the main construction site from the south. We urge EDF to pursue this option.

5. Extension to Order Limits of the Two Village Bypass

a. Current Proposals

The proposals in Consultation on Proposed Changes do not materially alter the general design of the Two Village Bypass (TVB) although where road safety improvements are achieved, MPC supports the measures.

b. Alignment of the TVB

The new proposals do not address the concerns of MPC that the proposed alignment of the TVB does not allow for a comprehensive long-term strategic bypassing solution for the A12 at Marlesford and Little Glemham which would provide the only conceivable long-term solution to the growing traffic problems faced by these communities.

It is accepted by the highways' authority that the proposed alignment of the TVB and particularly its southern junction with the A12, will make the eventual delivery of the Four Village bypass of Marlesford, Little Glemham, Stratford St Andrew and Farnham (Suffolk County Council's SEGway) highly problematic and expensive to achieve if it has to be "retro-fitted" after the completion of the TVB.

MPC remains opposed to the current route of the TVB.

6. Other Consultation Issues

a. Change to SSSI Crossing Design

The Environment Agency were clear in their Stage 4 consultation response that they could not support EDF's original proposal for a culvert under the access road which

crosses the SSSI. They stated on page 14 of their response “**Proposed culvert at SSSI crossing:** *The proposed culvert crossing has potential ecological, flood risk and geomorphological impacts. We would recommend a clear span bridge is considered.*” MPC therefore welcome EDF’s new proposals for a bridge crossing, although we believe that, as currently proposed, the crossing design would still impede the passage of a number of invertebrate species, therefore conflicting with the requirements of the Water Framework Directive, as the status of the relevant waterbodies would be adversely affected. We welcome EDF’s recognition of the SSSI crossing issue and would ask EDF to continue its work on the bridge design in order to further minimise adverse ecological impacts.

b. Changes to Sea Defences

MPC is not qualified to comment in detail on the proposed changes to the sea defence proposals, but it is aware that the proposals put forward in earlier consultations and the DCO application caused concern to many and were believed to be inadequate to cope with an increased frequency of storm surges and a general rise in sea level. MPC welcome the fact that EDF has further addressed this matter but are concerned that attention to such a fundamental safety issue has been left to the last minute. It is the view of this Council that substantially more detail will be required on the design of the sea defences before a proper evaluation can be made.

c. Extension of Order Limits to Allow Fen Meadow Creation at Pakenham

Whilst any properly created additional ecological mitigation is welcomed by MPC, it does not believe that Fen Meadow creation at Pakenham in West Suffolk can adequately compensate for lost habitat in the Sandlings of East Suffolk. It urges EDF to do more to ensure the protection of the Suffolk Coasts and Heaths AONB and, in particular, protect specific habitat types around the main Sizewell C site.

7. Conclusion

MPC regrets the fact that EDF did not listen to stakeholders’ concerns earlier in the consultation process. Had they done so, an extra step in the DCO process could have been avoided and more time would have been available for stakeholders to consider more comprehensive proposals from EDF.

The Parish Council is already concerned about the overall cost of the project which was reported at £20bn in an article in the Financial Times on June 25th, 2020. It is inevitable that the proposals contained in the latest consultation will further increase that cost and MPC questions whether the already fragile economics of the project may be further compromised.

MPC continues to have major concerns about the impact of the Sizewell C project on its own residents and on the wider population of East Suffolk. The area is going to bear the brunt of the disruption and environmental degradation and will pay a high price for hosting a facility which is designed to provide benefits on a national scale. MPC believes EDF needs to do more than is

being proposed, in order to protect local communities from the worst effects of traffic and environmental impacts.

MPC recognises that what are contained in the current consultation are proposals, and no commitment is being given by EDF on delivery of any of the options. The Parish Council therefore gives a cautious welcome to those measures that will reduce HGV traffic and limit environmental impacts, but it continues to withhold its support for the overall Sizewell C project and will only review its position when the full application details are available from EDF following this consultation.

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Lord Marlesford
Chair
Marlesford Parish Council

18 December 2020

**Eastern IFCA comments on the Proposed Changes to the Sizewell C
Application for a Development Consent Order**

Dear Sir

The role of Eastern IFCA is to lead, champion and manage a sustainable marine environment and inshore fisheries within our district, which extends from the Humber to Harwich, and six nautical miles out to sea. As the proposed Sizewell C facility is within those boundaries, and the project may generate effects which interact with our core role, we consider it appropriate that Eastern IFCA comment on the proposed project, and changes to the Development Consent Order (DCO) as proposed by the Sizewell C Project Team.

We restrict our comments to those aspects of the potential project that interact with our remit – namely effects which may have an impact on fishing opportunities and quality (including related impacts on the wider marine environment), and any activity with the potential to directly affect access to such opportunities.

We note the comment (Section 3.3.47.) that “*The proposed options do not alter the baseline conditions, the assessment of impacts or mitigation identified for any of the other environmental assessment topic areas or receptors as presented in the application.*” Similar assessments are presented in other places as well (e.g. Section 1.3.8 “*All predicted impacts from the enhanced permanent BLF are expected to be within the bounds of the original BLF assessment presented in the ES*”).

- 1. Our comments are based on the assumption that these statements where they occur are and remain true, and we suggest that there must be on-going assessment that this is in fact the case, with modification of approach and further consultation if such statements become untrue.**

We note that a significant part of the proposed changes to the DCO relate to the transport strategy, with a shift in emphasis from road based to rail and marine based. We do not offer comments on the fundamental merits of this change, but restrict our comments to those aspects of the proposed changes with the potential to interact with our remit.

The proposed changes to the transport regime require modifications to the structure and operation of the Beach Landing Facility (BLF). Section 3.3.6, in describing the structure of the BLF states *“Pier and cross beam supports would remain in place and form a permanent presence on the coast.”* However, the associated Figures (3.2 – 3.6) do not appear to show such cross beam supports.

- 2. We request clarification as to the proposed structure of the BLF, clear diagrams and images showing the proposed structure, and consideration of any impacts from the modified structure on access to fishing opportunities, both commercial and recreational.**

There is recognition that the proposed changes to BLF structures will restrict fishing opportunities more than would have the initial proposals (Section 1.3.9 *“Construction works and safety buffer zones around offshore infrastructure such as the BLF have the potential to restrict access to fishing grounds. The installation of offshore infrastructure hierarchical safety buffer zones of 250m to 500m (depending on the activity and stage of construction) would likely be applied surrounding construction vessels. Access to sections of the beach may be restricted for safety reasons. Safety buffer zones would result in localised, restricted access for beach-launched commercial vessels and beach anglers.”*

Section 1.3.10 *“The extension to enhance the permanent BLF marginally reduces the fishing area and access, but these remain as minor adverse effects on some of the fisheries activities occurring in the GSB (Netters, Potters, Long-liners, Otter trawlers). These are not significant and are the same as the original ES assessment.”* A very similar assessment is presented in Section 1.3.19 in connection with the temporary BLF).

- 3. We request clarification and specific details of any additional restriction on fishing opportunities and access to fishing (both commercial and recreational) arising as a result of the changes proposed to the DCO.**
- 4. We request details of liaison which has been undertaken with the fishing community (both commercial and recreational) in connection with the changes proposed to the DCO.**
- 5. We suggest that there must be effective and open ongoing communication at all stages of the design, construction and operation phase of the Sizewell C facility with the fishing community (both commercial and recreational).**

I will be grateful for your comments on the five points raised above – thank you.

Eastern IFCA continually seek to improve how we respond to consultations, both in terms of efficiency and content. Therefore, if any of the points raised in this response are reflected in the outcomes of the project we would appreciate being informed.

Please do not hesitate to contact me should you have any queries on the above response.

Yours sincerely

STEPHEN THOMPSON

Marine Science Officer

Aldeburgh Town Council's response to EDF Stage 5 consultation on Proposed Changes

Our response is on behalf of the residents, and those who work in and visit Aldeburgh. We have considered the information provided by EDF, and our concerns expressed in Stage 4 together with our relevant representation to the Planning Inspectorate - remain, and in fact have been increased significantly by the proposed changes.

Aldeburgh Town Council (ATC) objects to the application and to the proposed changes, as follows;

A. Freight (and traffic) Management Strategy

If the DCO were to be approved Sizewell C would be the biggest construction site in Europe, adding 12,000 vehicles each day to the A12 with these then travelling across our local rural network and the AONB to access the site. ATC acknowledges and agrees that measures to reduce the number of vehicles (HGV, LGV and cars) would be welcomed, however this must not be at the expense of, or to the detriment of, other considerations.

The numbers of vehicles reduced is only quoted as HGV volume and does not seem to be consistent with the proposed new strategy consultation document, with regard to the matters of flexibility or variation. There is only an account of the number of vehicles, but no consideration as to their capacity/weight and therefore of the noise and vibration caused. Any benefit may not be before the start of the construction phase and so will be minimal. The changes do not reduce our concerns or lessen our objection. Specifically:

1] Increased use of rail:

It is obvious from the consultation documentation that these proposals may not be practically achievable and many elements of them are speculative and not within the power of EDF to progress.

Years of lack of investment has resulted in a rural East Coast line where parts are single track only and therefore an increase in journeys would have to be overnight and before 7am (not during the day time). We believe that EDF have underestimated the total number of residents/properties which would be impacted by noise, vibration, dust and air pollution through the proposed increase in the number of journeys. It is planning a higher level of decibel threshold and a less robust mitigation which is totally inappropriate.

The details of the capacity of the freight trains is not available, so it is impossible to claim this will have a positive impact on the volume of vehicles, or to what extent. It would not seem economical to construct new holding areas and pay salaries of rail staff to travel to the area and then 'hold' trains overnight outside of Leiston. (And how is it acceptable to disrupt the sleep of people further down the line, but not those nearby?)

There is no guarantee that freight trains would not cause damage, or would not cause delays to the following day's passenger schedule. It is also not clear if/how the site would be able to unload an additional volume of materials on arrival at the temporary construction area. This change would not only interfere with the daily health and well-being of those living adjacent to the line, but also affect

a wider number of residents/workers/visitors who travel along roads adjacent to the train lines and existing road/pedestrian crossing points, and the overall tourism industry.

2] Increased use of sea:

Aldeburgh Town Council is opposed to any changes which would have a negative impact on coastal processes, amenity and recreational access to the beach (which is a vital natural resource and part of the tranquillity and attraction of the area), the fishing industry or marine ecology. Visual impact of the proposed structures on the beach would also affect tourism and remove the therapeutic nature of the beach as a vital feature of this area: part of the AONB and adjacent to RSPB Minsmere.

In Stage 3 we were told that a similar structure to the temporary Beach Landing Facility would not be possible due to the huge negative impact of piling. How can this now be possible, even if it is only during the winter to ensure stability? There is insufficient information or detail of how damage will be mitigated. Figures 3.3, 4, 5, and 6 are not helpful as they are not to scale with the power station, and we know about the way in which the beach changes, often unpredictably in this area.

We understand the temporary Beach Landing Facility would operate at night causing noise, vibration and light pollution, and at the worst option would average 460-590 deliveries over 7 months which is between 2-3 deliveries per day (on every high tide). It is not transparent what effect this will have on marine ecology, the fishing industry or access to the beach, as well as the risk to coastal processes both when it is under construction and while it is in operation. The permanent BLF is proposed to be longer and again without clear evidence of how this can be delivered safely and without negative impact. Figure 3.2 is not representative as it does not include the power station: necessary in order to understand the relationship with the main development site, Sizewell B and Sizewell A. We disagree with EDF's stated position that these changes will not impact visually.

We continue to have concerns regarding traffic - both the volume at peak of construction, and how vehicles will be monitored (especially LGVs and private cars going to the site and to/from workers accommodation and returning to the A12, park and ride sites etc.) The timing of travel appears to be to the front gate only, *so we are concerned that vehicles may be parked up locally awaiting entry. The proposed link road is not in the location requested by stakeholders and would affect residents as well as those working in or visiting Aldeburgh who travel along the surrounding roads. It will not be constructed prior to other work starting. The proposed changes do not reduce our concerns.

B. Main Development Site

ATC objects to the relocation of SZB infrastructure to facilitate potential new build and believe that EDF have not provided robust justification for siting the outage car parking, Visitors Centre and Training Facility within the nuclear site licensed area as opposed to adjacent or local brown field sites, especially as the refurbished canteen will now remain within the Sizewell B site. We are concerned that to reduce the height of the Training facility more land is needed as the building will be wider. We believe Coronation Wood should remain as a visual landscaping and noise barrier and not used to locate industrial buildings.

We understand that there is an area of Sizewell A land, belonging to the Nuclear Decommissioning Authority (NDA), which is not needed by Magnox for decommissioning. This has been subject to discussion between the NDA and EDF however, no formal offer has been made to EDF, neither has it been formally agreed that this land can be used to relocate Sizewell B infrastructure, and stakeholders have not been consulted on potential 'end state' for this land.

ATC is disappointed that the changes proposed only include reducing the height of one pylon, and that the additional pylon added at Stage 4 remains. We note that changes are also proposed to the working heights on the main development site. Some of these are linked to the new proposals for the BLF (permanent and temporary structures) including position of marine tunnelling shafts, taller working cranes, and that there will be additional stock piles for materials to be delivered sooner and stored on site for longer than previously planned. We object to these changes and do not believe they deliver benefits for stakeholders.

We do not have detailed comments regarding changes to the location of the water resource storage area and the addition of flood mitigation measures aimed to lower flood risk. Our level of confidence is reduced with this knowledge that EDF need to reassess their plans at this late stage of the process, following four rounds of formal consultation and over eight years in preparation. We would support the RSPB's response regarding Marsh Harriers, wet reedbed and wet woodland habitats. Likewise, regarding changes to the SSSI crossing design and the environmental impact this may have, we defer to and support the response from RSPB Minsmere, NWT and Natural England.

We understand and object to further trees and hedges being removed to facilitate potential use of the temporary rail infrastructure, along with the destruction already planned (removal of the majority of the field boundary hedgerows and large section of the plantation woodland at Goose Hill, and change from agricultural land to construction site - with stockpiles, haul/access roads, contractor compounds, borrow pits, water management zones and plant). The impact this will have on wildlife and habitats cannot be ignored. Plans to mitigate may not be effective as wildlife may never return, or not to the same extent, after construction.

We have concerns related to the creation of a temporary outfall over the proposed new sea defences which then emerges onto the beach. Although we understand this may not be used to drain off excess surface water on a regular basis it is adding a structure to the beach which is both visible and a hazard. It is not clear how this will be managed safely when used, and what the volume or speed of flow will be, or how access will be controlled at short notice or by whom?

Changes to the sea defence with a new Hard Coastal Defence Feature (HCDF) are surprising, and we are concerned that EDF are only now considering seriously the risk of flooding and have proposed increasing the height of the Hard Beach Defence by over 14m. We would need more information regarding the 'sheet pile' methodology. Diagrams and photographs, as well as the text in the consultation do not confirm the position of the toe of the facility or how far this is proposed to be from the site walls and how this will impact coastal processes and marine ecology. We do not agree with EDF that the changes do not alter the assessments of impacts or mitigation.

C. Creation of Fen Meadow and changes to Aldhurst Farm and Public Rights of Way/ footpaths:

ATC does not believe that the creation of fen meadow habitat at Pakenham, West Suffolk can be considered as further mitigation of loss of fen meadow habitat locally (in addition to that proposed at Halesworth or Benhall). This will not support or assist in terms of the local offer for residents, visitors or those who work in the area to access for recreation, health (physical, mental and emotional) and general well-being which has always been valued and especially this year with the additional stress of Covid-19. It is also too far away to sensibly attract wildlife to relocate and then to return. The consultation states that a PEI (Preliminary Environmental Impact) assessment will be

undertaken; ATC believes this should be completed so this can be included into the early stages of the DCO application examination.

We have no detailed observations regarding the new bridleway link between Aldhurst Farm and Kenton Hills except that the timing for delivery of the crossing over Lover's Lane after the main construction of Sizewell C, is too late - and should be in place prior to construction. Our concerns regarding PROW and footpath closures remain.

D. Additional land required:

Although we could not find specific reference to this, except to facilitate the construction of the link road - we understand that local residents have received letters requesting additional land via compulsory purchase due to the proposed changes.

E. Economic impact and proposed benefit:

EDF have stated that to reduce the build cost and reduce the significant risks of a complicated build you will be using the Hinkley Point supply chain and workforce. This would mean that 6,000 relocated workers will need accommodation, pushing up rents and house prices for local people, (especially those in lower cost housing) and displacing other visitors. The typical 'spend' of a worker is not the same as that of our traditional visitor which will impact disproportionately on Aldeburgh's many independent businesses. Many of the remaining workers are expected to travel from up to 90 minutes away so the promise of 'local' jobs is not a reality and Employment Law prevents selection based on postcode. Independent studies found that up to £40 million would be lost to our valuable tourism industry each year of construction and we do not believe that the Housing and the Tourism Funds proposed in the original application will be able to mitigate these impacts.

In conclusion:

There is insufficient information or level of detail, and no certainty that the proposed changes are deliverable, or what benefits they will achieve compared with the existing application DCO. This consultation has generated more stress and uncertainty and drains the valuable and finite resources of this Council and individuals at a time when we are still involved in Covid-19 related activities, communications are more challenging, and our lives overall are more strained.

We fail to see why EDF have proposed these changes so close to the start of the DCO process, rather than delaying their application to PINS, unless this was a response to the huge volume of relevant representations expressing concerns, and to influence statutory objections from East Suffolk and Suffolk County Council. We are also dismayed by the inclusion of options which were previously ruled out by EDF as not possible. And the exclusion of matters which would really make a positive change to the application such as; relocation of the workers accommodation, relocation of Sizewell B infrastructure to other brown-field site options, and/or consideration of route D2 for the link road.

The changes outlined above do nothing to address the potential threats to our economy and the health and well-being of those we represent. We disagree that this project will contribute to the achievement of Carbon targets due to the timeline and length of construction – by then the need for nuclear power will almost certainly have declined, and it is certain that the technology and design will have been superseded. Nor do we believe that this project will contribute to 'build back better' post Covid-19. With a Government review of the Energy Policy due imminently and the cumulative impact of other proposed Energy projects, our position is of rejection for the application and therefore of the proposed changes due to the overwhelming harm that would be caused.

Aldeburgh Town Council's response to EDF Stage 5 consultation on Proposed Changes Our response is on behalf of the residents, and those who work in and visit Aldeburgh. We have considered the information provided by EDF, and our concerns expressed in Stage 4 together with our relevant representation to the Planning Inspectorate - remain, and in fact have been increased significantly by the proposed changes. Aldeburgh Town Council (ATC) objects to the application and to the proposed changes, as follows; A. Freight (and traffic) Management Strategy If the DCO were to be approved Sizewell C would be the biggest construction site in Europe, adding 12,000 vehicles each day to the A12 with these then travelling across our local rural network and the AONB to access the site. ATC acknowledges and agrees that measures to reduce the number of vehicles (HGV, LGV and cars) would be welcomed, however this must not be at the expense of, or to the detriment of, other considerations. 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It is also not clear if/how the site would be able to unload an additional volume of materials on arrival at the temporary construction area. This change would not only interfere with the daily health and well-being of those living adjacent to the line, but also affect a wider number of residents/workers/visitors who travel along roads adjacent to the train lines and existing road/pedestrian crossing points, and the overall tourism industry. 2] Increased use of sea: Aldeburgh Town Council is opposed to any changes which would have a negative impact on coastal processes, amenity and recreational access to the beach (which is a vital natural resource and part of the tranquillity and attraction of the area), the fishing industry or marine ecology. Visual impact of the proposed structures on the beach would also affect tourism and remove the therapeutic nature of the beach as a vital feature of this area: part of the AONB and adjacent to RSPB Minsmere. 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We have no detailed observations regarding the new bridleway link between Aldhurst Farm and Kenton Hills except that the timing for delivery of the crossing over Lover's Lane after the main construction of Sizewell C, is too late - and should be in place prior to construction. Our concerns regarding PROW and footpath closures remain. D. Additional land required: Although we could not find specific reference to this, except to facilitate the construction of the link road - we understand that local residents have received letters requesting additional land via compulsory purchase due to the proposed changes. E. Economic impact and proposed benefit: EDF have stated that to reduce the build cost and reduce the significant risks of a complicated build you will be using the Hinkley Point supply chain and workforce. This would mean that 6,000 relocated workers will need accommodation, pushing up rents and house prices for local people, (especially those in lower cost housing) and displacing other visitors. The typical spend of a worker is not the same as that of our traditional visitor which will impact disproportionately on Aldeburgh's many independent businesses. Many of the remaining workers are expected to travel from up to 90 minutes away so the promise of 'local' jobs is not a reality and Employment Law prevents selection based on postcode. Independent studies found that up to £40 million

would be lost to our valuable tourism industry each year of construction and we do not believe that the Housing and the Tourism Funds proposed in the original application will be able to mitigate these impacts. In conclusion: There is insufficient information or level of detail, and no certainty that the proposed changes are deliverable, or what benefits they will achieve compared with the existing application DCO. This consultation has generated more stress and uncertainty and drains the valuable and finite resources of this Council and individuals at a time when we are still involved in Covid-19 related activities, communications are more challenging, and our lives overall are more strained. We fail to see why EDF have proposed these changes so close to the start of the DCO process, rather than delaying their application to PINS, unless this was a response to the huge volume of relevant representations expressing concerns, and to influence statutory objections from East Suffolk and Suffolk County Council. We are also dismayed by the inclusion of options which were previously ruled out by EDF as not possible. And the exclusion of matters which would really make a positive change to the application such as; relocation of the workers accommodation, relocation of Sizewell B infrastructure to other brown-field site options, and/or consideration of route D2 for the link road. The changes outlined above do nothing to address the potential threats to our economy and the health and well-being of those we represent. We disagree that this project will contribute to the achievement of Carbon targets due to the timeline and length of construction – by then the need for nuclear power will almost certainly have declined, and it is certain that the technology and design will have been superseded. Nor do we believe that this project will contribute to –build back better–™ post Covid-19. With a Government review of the Energy Policy due imminently and the cumulative impact of other proposed Energy projects, our position is of rejection for the application and therefore of the proposed changes due to the overwhelming harm that would be caused.



East Suffolk Council response to the Changes consultation

December 2020

Glossary of acronyms

AIL	Abnormal Indivisible Load
AOD	Above Ordnance Datum
AQMA	Stratford St Andrew Air Quality Management Area
BLF	Beach Landing Facility
DCO	Development Consent Order
ESC	East Suffolk Council
HCDF	Hard Coastal Defence Feature
HGVs	Heavy Goods Vehicles
LOAEL	Lowest observed adverse effect level
MMP	Monitoring and Mitigation Plan
PINS	the Planning Inspectorate
SCDF	Soft Coastal Defence Feature
SEP	Self Elevating Platform
SOAEL	Significant observed adverse effect level
SSSI	Site of Special Scientific Interest
WHO	World Health Organisation
WMZ	Water Management Zone

Response of East Suffolk Council

1. East Suffolk Council (ESC) cautiously welcomes the changes consultation in giving us an opportunity to provide feedback on potential proposals prior to formal submission to the Planning Inspectorate (PINS) in January 2021.
2. We are cautious as there remains many not yet answered questions in relation to the original Development Consent Order (DCO) submission, therefore, to make changes at this late date leads to concerns that we will not have adequate time to properly assess changes when submitted in 2021. Our relevant representation previously submitted remains valid at this stage. We hope to be in a position to formally comment on change proposals once submitted to PINS.
3. A number of the changes under consideration seem to be aimed at reducing the number of Heavy Goods Vehicles (HGVs) on the road in relation to the construction of Sizewell C. This is commendable and ESC supports the benefits to potential congestion, air quality and noise emanating from less HGVs arising from the development. However, the alternative is a new long temporary beach landing facility and an additional three trains resulting in 5 additional rail movements overnight in addition to the four paths proposed in the DCO currently. ESC has concerns with the impacts of the additional temporary beach landing facility on coastal processes – it would appear that option 4 would have the lesser impact but this cannot be fully assessed without detailed environmental information.
4. ESC has existing concerns with the four rail paths proposed in the DCO to run overnight and the impact this may have on the health and wellbeing of residents living close to the currently silent overnight rail line through disturbed sleep for the construction period of 9 – 12 years. Increasing this number significantly raises our concerns. We have not yet been convinced that a Noise Mitigation Strategy will effectively mitigate for the noise disruption of so many rail movements over-night. Further detail on this is given below.
5. ESC wants to ensure that if Sizewell C is consented that we have the right mitigation in place at the right time for our residents, businesses and coastline. We have not seen the detailed environmental information we need to determine if SZC Co.'s proposals are sufficient. We are concerned that when changes are submitted to PINS that we will not have sufficient time to properly analyse and assess the detailed environmental information required to subsequently advise the Examining Authority.
6. This document begins with a few generalised topic-based paragraphs before following the subject order of the changes publication.

Environmental Protection

7. The comments in this response are preliminary and subject to change due to ongoing discussion with SZC Co. and ongoing technical assessment by ESC and the consultants we have engaged to provide technical advice in respect of Noise and Vibration across the DCO submission.

Air Quality

8. The change document highlights the potential to reduce typical day HGV movements from 650 to 500, a reduction of 150 HGV movements per day (75 HGVs). During the busiest day scenario, this would increase to a reduction of 300 HGV movements a day (150 HGVs). This would provide an air quality benefit in the peak construction periods.
9. With regards to impacts in the Stratford St Andrew Air Quality Management Area (AQMA), background concentrations are projected to decrease sufficiently for Sizewell C's impact upon local air quality to be insignificant in the 2028 and 2034 peak construction scenarios. The Two Villages bypass will be constructed by this stage, effectively eliminating the risk of air quality impacts in the AQMA resulting from SZC Co. traffic. The main scenario of concern for local air quality is therefore the early years 2023 scenario, as there is a risk that background concentrations will not decrease sufficiently for Sizewell C's contribution to be insignificant within the Stratford St Andrew AQMA by this time. However, within paragraph number 3.2.25 of the Freight Management Strategy, it is mentioned that the marine and rail infrastructure will not be in place early enough to affect the early year 2023 HGV numbers. Consequently, the freight management strategy does not alter the Council's position detailed within the relevant representation regarding the risk of impacts in the AQMA due to HGV movements. If we combine these with the effects of ScottishPower Renewable's construction vehicles there is a potential cumulative effect that needs to be addressed.

Coastal

10. Our assessment of the proposals is highly limited because further information is required on many matters to adequately describe the works and their potential impacts and to clearly show how the changed works and their impacts differ from the information presented in the DCO.
11. The detail below must therefore be regarded as a preliminary view conditional upon the supply of additional material by SZC Co. and our review of it.

12. In addition, a robust and SZC Co. fully-funded Monitoring and Mitigation Plan (MMP) is a critical requirement in the delivery of satisfactory outcomes. We recommend that this document be placed in the public domain, via PINS or another route, now.
13. The feedback given below on elements of the works should be read in parallel with feedback given in response to the DCO. We recognise that the new works information may either alter or make redundant previous feedback however we are keen to ensure that the previous feedback is not overlooked or regarded as superseded.
14. Furthermore, we wish to indicate our disappointment that we are still awaiting responses to questions and points of clarification from the DCO response and that the new change proposals have not clarified or answered those concerns - in fact, there are now more areas we need to establish answers to making it increasingly unlikely that ESC, along with the communities we represent, will be able to reach common ground on these matters in the timescales provided.

Highways

15. Although ESC has supported aspirations for a sustainable transport solution, it must be a deliverable sustainable solution that does not have significant adverse impacts. To date, SZC Co. have proposed an integrated transport solution with a combination of rail, sea, and road. National Policy Statement EN-1 (Energy) is very keen on sustainable development and states that the consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. EN-1 refers to water-borne or rail transport being preferred over road transport, where cost-effective. It then goes on to reference specific controls that can be utilised to manage substantial HGV traffic. Initial sea proposals for an 800m long jetty were previously dismissed by SZC Co., We welcome the potential opportunities to increase the ability of the permanent beach landing facility to receive up to 100 abnormal indivisible loads (AILs) per campaign. We cautiously welcome the potential for an additional temporary beach landing facility to bring in aggregates, however, see detail below for our full response to the temporary beach landing facility.
16. The increase in rail is concerning to ESC given we have existing concerns with the night-time rail proposed in the DCO that have not yet been allayed, increasing rail freight over-night potentially increases these concerns significantly. ESC wants an appropriately balanced assessment of less HGVs vs increased sea and over-night rail to be undertaken. On the preliminary environmental information provided we are currently unable to undertake that full balanced assessment. We need more information to properly balance adverse impacts arising from increased rail, and potentially sea, with the potential decrease in noise, vibration and improved air

quality associated with the reduction in HGVs, as well as other potential comparative impacts of reducing HGV movements such as reductions in collisions, driver delay, vulnerable road user amenity, fear and intimidation and other local impacts. This additional information should also include details of the delivery timescales of all the proposed mitigation and details of any contingency if there are delays in the programme. ESC would welcome the early commitment of SZC Co. to upgrade the rail line working with Network Rail if it is determined that improvements are required.

17. The proposal identifies that the potential is being investigated for a fifth train; however, there is uncertainty over this train's timings and potential impacts, including on the passenger service. As a principle, ESC would seek to minimise any disruption to the passenger service as far as possible; however further information is needed to understand the impacts and we would recommend engagement with Greater Anglia on understanding the potential impacts, including those on passengers.

Freight Management Strategy – Rail

18. Environmental Protection: It is important to note that there are currently significant concerns with the DCO as submitted in terms of the freight management strategy particularly in respect of night rail freight, there are concerns that the noise and vibration assessments may be underestimating impact and the conclusions reached thus far are prone to a significant amount of uncertainty. One of our key concerns is that the majority (all bar one) of the rail movements will occur between 23.00 and 07.00, this period is regarded by many important guidance documents as night-time and is subject to a higher level of sensitivity in terms of noise impact.
19. The significance criteria adopted by SZC Co. may not be protective enough to residents along the track and the actions triggered by breach of those criteria is not considered to do enough to protect residents in fundamental areas such as sleep disturbance. Mitigation and control that is appropriate to the situation and adequate to prevent breach of [still to be agreed] internal sleep disturbance sound levels, where that breach cannot be avoided, must underpin any proposal for night rail freight movements, be it as a result of those already proposed in the DCO application or as a result of these changes.
20. The change proposal seeks to reduce the number of HGV movements and puts significant emphasis on the importance of rail and marine solutions to take the burden of freight management. Whilst in broad terms the aspiration to remove HGVs from the highway is supported by ESC, it must be considered and balanced in terms of impacts and this aspiration cannot come at the cost of disproportionately shifting impacts elsewhere. Given that the DCO proposals require further consideration in terms of mitigation and control

for noise and vibration from night rail movements, these changes require even more emphasis and effort to be made in this regard by SZC Co. as ESC will be unable to accept the proposals until residents are adequately protected from noise and vibration impacts in line with current legislation, guidance, and best practice. ESC's expectation is that the same extensive investment as proposed in relation to road infrastructure is considered applicable to the support of rail freight, particularly in terms of noise and vibration mitigation and control.

21. Various mitigation is mentioned including use of a Class 66 locomotive, but ESC needs to clearly understand what the noise impacts of this type of engine are? What other options of locomotive exist, and will the lowest impact class of locomotive be used? Additional concerns relate to proposals for 6 movements a day (5 overnight, 1 daytime) six days a week which would impact on Saturday, night-time, and weekends – when residents are most likely to be in their properties which means they will receive little respite from a noise source that previously was not present in any significant way prior to this proposal. As well as project embedded mitigation, there needs to be consideration of property eligible for mitigation because of impacts arising from noise / vibration. This scheme needs to be appropriately detailed, agreed with ESC, and available for all affected properties – this is likely to involve flexibility within any agreed scheme.
22. SZC Co. proposes sound insulation above SOAEL (Significant Observed Adverse Effect Level), this is currently unacceptable, significance criteria are external levels and mitigation for residential properties should be driven by internal sleep disturbance criteria. A LOAEL (Lowest Observable Adverse Effect Level), of 60dB has been adopted to produce an internal level of 45dB which accords with the World Health Organisation (WHO) sleep disturbance criteria for LAmx in the WHO Guidelines for Community Health and should be the minimum level of protection for residents. Noise levels above LOAEL will breach the sleep disturbance criteria internally and could therefore lead to adverse effects in terms of sleep disturbance between LOAEL and SOAEL and so mitigation should be provided within this range to achieve a recognised sleep disturbance sound level internally. This is critical for the success of a night rail freight operation on a line that prior to these trains running has had very little night movement and certainly nothing of this magnitude, regularity or type. The currently proposed Noise Mitigation Scheme needs refinement to allay ESC's concerns.
23. Highways: There are several questions with regards to the potential for freight trains to take HGVs from the road, calculations provided in the change's documentation do not seem to equate to overall assessment of reduction of HGVs. This is requested to be fully examined so we can be confident in the number of HGVs potentially taken from the road if rail use is maximised.

24. At paragraph 3.2.8 it is indicated that the potential exists for the Land East of Eastlands Industrial Estate to continue to be used as a railhead should four trains per day be achieved. Further information is sought on why it would need to be used, and whether this relates to the capacity of the main site to manage additional rail movements.
25. Ecology: The potential for the increase in the number of night-time trains is noted, however the assessment provided does not consider the potential for impacts on nocturnal wildlife, particularly in relation to foraging and commuting bats and owls. This must be assessed as part of the proposed changes to ensure that an increase in night-time train movements does not result in increased ecological impacts.
26. Air Quality: The reduction in HGV movements would be achieved by increasing transport via rail and shipping vessels. The risk from rail impacts has been demonstrated as insignificant using very conservative estimates. As a result, the risk of air quality impacts from additional locomotives in transit and idling is not considered likely to be significant, as demonstrated within the DCO application. We welcome that SZC Co. have highlighted that air quality impacts from additional rail movements will be assessed.

Freight Management Strategy – Road

27. Environmental Protection: The consultation is quoted as saying the benefit of a reduction in HGV movements of up to 150 HGVs is a 1.5dB decrease in the impact of this project on road traffic noise. It should be noted that it is generally accepted that 3dB is the level at which the average person can perceive an audible change. ESC disagrees with SZC Co's assertion that there will be a benefit to road traffic noise as ESC considers there will be an unperceivable negligible impact. It is important to note this is a reduction on the impact the project makes to road traffic noise not a reduction on the current road traffic noise level. This is important in the balance of impact assessment that is required.

Enhancing the permanent beach landing facility (BLF)

28. Coastal: We understand the proposals will increase the number of abnormal indivisible loads (AILs) able to be received in the construction phase from 50 per annum to 100 per annum which will in turn reduce HGV deliveries.
29. In discussions during this consultation period the opportunity for the berthing platform (or grillage) design to exclude piles and favour concrete over wood is being explored. ESC would prefer a berthing platform that does not include piles.

30. Impacts from dredging of the outer sand bar for navigation access and sediment movement blocking by the berthing platform are new / increased risks that require further investigation and modelling to confirm and quantify.
31. The use of a backhoe dredger, in preference to a plough, is of concern to ESC as it has potential to lead to a loss of material from the nearshore system.
32. SZC Co's assessment of the potential environmental impacts of the changes appears reasonable based on the limited information available.
33. The changes have potential to cause additional negative impacts that are temporary and potentially manageable via the MMP process, but this needs to be demonstrated by SZC Co. in respect of detailed further studies and modelling.
34. We welcome further detailed investigation and impact assessment of this design with the caveat that our final view may alter when the detailed design and impact assessment information is presented.
35. However, our cautious support in this area is dependent upon agreement with SZC Co. (and Marine Technical Forum partners) of a MMP that includes appropriate coverage of these risks.
36. Public rights of way / amenity and recreation: The enhanced BLF will have many more deliveries (100 per campaign) and the consultation is silent as to how these will be managed to minimise impact on access. Our expectation is that access to the beach will be maintained during construction and operation of the BLF and beach closures kept to the absolute minimum.
37. Highways: It is assumed that the enhanced BLF is responding to demand for AILs (up to 100 a campaign), confirmation is required that the demand will be there?
38. Ecology: As recognised in the consultation document further assessment of marine ecology impacts and impacts on terrestrial designated sites (caused by changes in coastal processes) are required in relation to the enhanced permanent BLF. In the absence of this information, it is not possible to conclude whether there would be increased adverse impacts or whether the proposed changes are acceptable.
39. Air quality: additional vessel movements resulting from an extended permanent BLF should be assessed in isolation and in combination with other Sizewell C emission sources. It is mentioned within paragraph number 3.3.2 that the existing permanent beach landing could receive 30 large beach landings per year, and in paragraph 3.3.13

that this could increase to 100 with enhancements. SZC Co. has committed to assessing the additional vessel movements' impact upon local air quality further. We consider that this should comprise a screening and/or quantitative assessment of impacts due to the additional vessel movements. The screening out or assessment should include consideration of vessels associated with beach landing facility changes in isolation and in-combination with other activities.

A new, temporary beach landing facility options

40. Coastal: ESC, at this stage cannot comment on the appropriate or inappropriateness of a new temporary beach landing facility.
41. We understand the proposals offer increasing volumes of potential bulk fill import capacity that will reduce HGV deliveries by road.
42. ESC would prefer to minimise the use of additional permanent embedded piles, to maximise the use of fully removable equipment and avoid the need for dredging of the outer bar.
43. The potential use of Self Elevating Platforms (SEPs) and a berthing platform (grillage) that does not include piles is preferred.
44. Impacts from dredging of the outer sand bar for navigation access and sediment movement blocking by the berthing platform are new / increased risks that require further investigation and modelling to confirm and quantify.
45. The use of a backhoe dredger, in preference to a plough, is of concern to us as it has potential to lead to a loss of material from the nearshore system.
46. SZC Co's assessment of the potential environmental impacts of the changes appears reasonable on the limited information provided.
47. Our view is that the changes have potential to cause additional negative impacts that are temporary and potentially manageable via the MMP process.
48. In discussions we note SZC Co. concerns that SEPs may not deliver the stability required for use of a conveyor and would result in a shorter campaign. We understand that SZC Co. are considering an alternative option 4 that is piled over its full length and longer, that would provide more secure, increased capacity for sea deliveries. If that is the case, we would need to see full details of the proposed works and the associated environmental impact assessment to provide a comment.

49. We do not object to further detailed investigation and impact assessment of these options with a caveat that our final view may alter when the detailed design and impact assessment information is presented.
50. Our non-objection is also dependent upon agreement with SZC Co. (and Marine Technical Forum partners) of a MMP that includes appropriate coverage of these risks.
51. Landscape: There is no doubt that any additional BLF will have an adverse effect on the coastal character of the beach area and near shore coastal waters in the immediate locality of Sizewell Beach. However, in relation to the overall impact of the construction phase, it is not considered that it is likely to be of significance beyond the visual envelope of the beach area. However, we still need to be advised on the issue of lighting should either BLF be used in less than full daylight, navigation lighting requirements, and the scale of the vessels involved.
52. Public rights of way / amenity and recreation: ESC welcomes keeping access available during the construction and operation of the temporary BLF. Further assessment is needed to assess the impact of the temporary BLF on the amenity and experience of users of coastal access.
53. Ecology: It is agreed that the conclusion that the proposed temporary BLF will have little terrestrial ecological impact, as construction of the Hard Coastal Defence Feature (HCDF) will already have removed the part of the Suffolk Shingle Beaches County Wildlife Site which sits in front of the platform. From a marine ecology and designated sites perspective, as with the enhanced permanent BLF the consultation document recognises that further assessment of these impacts is required and in the absence of this information it is not possible to determine which option is the least ecologically damaging. It is also likely that a seasonal restriction on piling activities will be required to protect nesting little terns.
54. Air quality: Additional vessel movements resulting from a second temporary BLF should be assessed in isolation and in combination with other Sizewell C emission sources. The vessels are being used to transport aggregates, with a planned conveyor belt between the beach and stockpile locations. We request that the conveyor belts are covered to reduce dust and particulate impacts. The temporary beach landing facilities currently at option appraisal have a range of aggregate capacity, from 200,000 to 1.4 million tonnes as detailed within Table 3.6. As set out in Table 3.7, SZC Co. has committed to assessing the additional vessel movements' impact upon local air quality further. We consider that this should comprise a screening and/or quantitative assessment of impacts due to the additional vessel movements. The

screening out or assessment should include consideration of vessels associated with beach landing facility changes in isolation and in-combination with other activities.

55. Environmental Protection: Environmental impacts in terms of noise, vibration, light, and dust will need to be considered and the mitigation of those impacts addressed for whichever option is chosen.

56. Highways: Table 3.4 indicates that Options 1 and 2 for the temporary BLF would equate to a reduction of 25 HGVs and Options 3 and 4 would result in reduction of 50 HGVs. However, these figures do not directly compare with the tonnes of material set out at Table 3.6, which indicate Options 1 and 2 could deliver as much as 40 HGVs daily and Option 3 and 4 would be considerably more than this. This may be because the applicant has averaged the campaign total over a 12-month period but clarification on this is requested. In relation to this, would the HGV profile on the roads increase outside of the BLF campaign period? Should HGV movements increase outside the BLF operational periods (May to October), how would these be conditioned and regulated? Being weather dependent this could be changeable in different years and difficult to predict and therefore control?

57. Public rights of way / access and recreation: the use of a conveyor and hopper system the length of the temporary BLF would be introducing a significant amount of additional infrastructure to the beach at Sizewell for on and offshore users of the beach. It is likely that the physical and visual disruptions and noise associated with the construction and operation of two BLF's will further degrade the amenity value of the beach and make it a less desirable place to visit. This will increase recreational displacement to other areas that will need to be assessed and compensated for.

New bridleway link between Aldhurst Farm and Kenton Hills

58. Public rights of way / access and recreation: ESC welcome this proposal and requests that the crossing point be located where it provides as safe and direct a link as possible, between the two locations. We support the option of this route being available during the construction period and would accept this being limited to pedestrians until the remainder of public bridleway 19 from Lover's Lane to the Eastbridge Road is re-opened.

59. This links to the removal of the replacement Sizewell B outage car park from Pillbox Field, walkers, cyclists, and horse riders must cross Sizewell Gap to access the public bridleway. Removal of the outage car park removes a source of traffic on this crossing place which is welcomed.

60. Highways: ESC welcomes further information on when it is envisaged the link would be delivered (for pedestrians and then for horses) and the proposed form of the bridleway crossing of Lover's Lane. Consideration should be given to whether in the operational phase, following removal of the lagoon to the south of Lover's Lane and the secondary access ghost island, the crossing point cannot be located closer to the south end of bridleway 19 to match the desire line of users. It is currently envisaged that the changes to the alignment of Lover's Lane in this area should be able to provide the necessary visibility for a safe crossing point.

Sizewell B Relocated Facilities changes

61. Landscape: The removal of the temporary carpark from Pillbox Field to the Sizewell A site is greatly welcomed. The Option 2 scenario of still using Pillbox Field for outage carparking is noted but would not be the preferred option in terms of anticipated adverse landscape impact.

62. Ecology: Ecologically Option 1 is preferable as it removes the car park from Pill Box Field. Option 2 is ecologically no better than the existing approved scheme.

63. Reduction in building heights is welcomed.

64. The 10 for 1 planting proposals for Pillbox Field are welcomed and details concerning the problems of establishing trees on these light sandy soils, and the issue of deer management have recently been agreed in respect of the 2019 Town and Country Planning Act consent.

65. Archaeology: Pillbox field has a defined area of archaeology requiring mitigation. We have provided comments in relation to the latest planning application for this area, but now plans have changed to remove disturbance away from the area of archaeology. A management plan outlining how remains are to be preserved in situ both prior to, during and after construction and including during proposed landscaping works on this field, is required. Should plans revert to locating the car park over the area of known archaeology, excavation will be required. Coronation Wood has now had an earthwork survey but still requires trenched evaluation, followed by mitigation as appropriate.

66. Air Quality: Within Table 4.1 SZC Co. has specified that no further assessment of Sizewell B facilities relocation is required for air quality due to these changes. It is agreed that an updated air quality assessment is not required.

67. Highways: The change of use of Pillbox Field from the outage car park to a landscaped area would be acceptable in transport terms provided:

- SZC Co. confirms that there will be no intensification in the use of the site entrance to Sizewell B compared to the current usage during Sizewell B outages;
- A safe crossing point is provided for users of bridleway 19 on Sizewell Gap to mitigate the increase in use during construction of Sizewell C and the Sizewell B relocation; and
- SZC Co. quantifies the use of the existing access to Pillbox Field from Sizewell Gap for landscaping works, so that any risks to highway users can be assessed.

Construction Parameters

68. Landscape: The new stockpile is noted, it is unlikely to offer significant additional impact, and even then, temporary. A more detailed comment can be provided once further information emerges, especially in respect of sequencing with other proposed stockpiles.

69. Ecology: No comment at this stage.

Other main site changes

Sea defence

Hard Coastal Defence Feature (HCDF) structure.

70. Coastal: Raising the defence height: We accept that the crest height must be set at a level that provides appropriate flood protection and resilience to the station. We are however surprised at the amount of change (from 10.2m Above Ordnance Datum (AOD) SCDF to 14m AOD) which we note is due to new climate change information.

71. Seaward movement of the defence: We understand that the crest height increases and the relocation of Marine Shafts to outside the cut-off walls has led / contributed to a *significant* seaward movement of the initial HCDF profile of ~8m (tbc) compared to the DCO condition.

72. The adaptive profile appears to move the rock slope much further seaward.

73. ESC is disappointed no information is included on under what environmental conditions the adaptive profile would be built. We expect to see more detail of the profile design at this stage of development to make an informed decision.

74. We are surprised at the lack of detailed information on the nature and extent of changes in HCDF profile when compared with DCO proposals including how the more seaward position will affect planned mitigation actions, notably Soft Coastal Design Feature (SCDF) design and management and the post-SCDF phase of beach management.
75. This absence of data prevents SZC Co. from undertaking a meaningful assessment of linked environmental impacts which is reflected in the lack of information on coastal change impacts included in the consultation. It is therefore not possible for stakeholders to make an informed assessment and provide comment.
76. We believe that the apparent significant seaward movement of the defence will lead to an earlier, (and over the site lifetime) much greater negative impact on natural shoreline change.
77. We had raised concerns in our DCO feedback at the potential impact of the defence position, as described at that time, relative to the shoreline. This information significantly increases our concerns not least because the change evidence to date does not indicate the extent and timing of the interception by the HCDF on the active shoreline, including both the SCDF and the natural beach.
78. We therefore conclude that the indicative HCDF designs presented are not acceptable and that further work is required by SZC Co. to produce more developed HCDF design information that can increase the crest height without an associated significant seaward movement.
79. As part of this process, we request that options are prepared and presented for review by consultees that:
1. avoids a significant seaward movement as part of the transition to an adaptive profile.
 2. ensures that the initial toe detail / level is appropriate in the context of the site life and potential shoreline retreat / beach level drop.
 3. includes the use of engineered structures e.g., wave return walls, in both initial and adaptive profiles whilst managing the proposed landscaping measures by which the infilling the rock armour with a soil for planting, would impair the hydraulic properties of the structure.
80. We also request that, if the relocation of Marine Shafts to outside the cut-off walls has moved the HCDF seaward, SZC Co. provides an explanation on how the temporary

construction-related benefits of this action have been compared with and justified against the long-term negative impacts of a more seaward HCDF.

81. Our view is that the proposal must be assessed as an integrated package therefore we must object to the proposed 'indicative' designs of the HCDF because of the apparent significant seaward movement of the HCDF and the uncertain impacts on coastal processes caused by it.
82. We require SZC Co. to prepare a developed HCDF proposal that addresses the concerns described above together with further detailed investigation and impact assessments.
83. We also require SZC Co. to demonstrate that the MMP includes appropriate coverage of any changes to forecast impacts and mitigation measures.
84. Landscape: ESC has no significant concerns from a landscape perspective subject to a well-considered surface restoration programme in line with what has been discussed previously.
85. Public rights of way / access and recreation: the figures provide no obvious reference points that would enable comparison with the design shown in the DCO. The single figure does not show the defence in context along the whole frontage where some areas are narrower and more vulnerable to erosion such as at the north end near to the proposed BLF.
86. Table 4.6, we disagree with the conclusion in Table 4.6 Preliminary Environmental Information that no further assessment is required with respect to amenity and recreation.
87. The new proposals will move the sea defence (at least – best estimate) 8m further seaward than that presented in the DCO. There are assumptions made in the DCO about the expected viable life of the sacrificial soft defence based on its position and form, and it is expected that the soft sacrificial defence will become non-viable between 2050-2080. However, there is not enough evidence or information provided in this consultation to be able to assess the impact of the new proposals on the public footpath (E-363/021/0). The concern is that the risk of erosion of the soft defence and hence the exposure of the public footpath could be sooner than the assumptions predicted in the original draft DCO.

88. Unless evidence can be provided, it appears that these proposals will make the public footpath more vulnerable to early loss than is currently anticipated with the design proposed in the draft DCO. ESC supports SCC as the responsible authority for public rights of way, in its objection to re-locating the permanent public footpath where it will be expected to erode, creating a management and legal liability for SCC.

89. Ecology: Will the changes proposed to the HCDF mean that the soft material covering it are lost/need recharging earlier in the life of the station? If so, this would mean that the long-term impacts (and potentially eventual loss) on this part of the Suffolk Shingle Beaches County Wildlife Site would be accelerated, potentially resulting in a worse long-term impact than that assessed in the Environment Statement.

Simplification of construction of temporary sea defence

90. Coastal: ESC does not object to the principle of a sheet pile construction phase defence.

91. We require more information on its plan location and profile relative to the proposed permanent HCDF, the permanent and temporary BLFs, the HCDF assumed at DCO stage and other features, inc. Mean High Water Springs, to give context.

92. We note that at the southern extent of the Sizewell C frontage the temporary defence line makes a 90 degree return landward. Is this a proposed change to the DCO condition that featured a tapered transition between the Sizewell C HCDF and the Sizewell B defence? If so, please provide a justification for the change and an assessment of the new impacts.

Temporary drainage pipe

93. Coastal: ESC does not have any significant concerns with the construction of a Storm Water Outfall from a coastal processes' perspective.

94. Whilst the designated Coastal Path is above the planned outfall position people will walk on the beach below it.

95. We recommend consideration be given to adding signs warning beach users of potential sudden and large flows. In addition, the pipe should be secured to avoid dogs / people getting inside.

96. Drainage: Please clarify if Water Management Zones (WMZ) 7, 8 and 9 are still discharging to WMZ 1 or 2 prior to combined drainage outfall? Or if this proposal will replace that? Our concern is that if the other WMZs are not utilised the temporary

outfall will be used in every storm event, not just the extreme storm events (greater than 1 in 30) that it is proposed to be designed for.

97. We need to see the calculations behind the design of this outfall to understand how it fits with surface water drainage proposals for the whole of the Main Development Site, to date we are unsighted on the evidence.
98. Our concerns relate not to the water going out to sea but whether it is not going into watercourses that are linked with sensitive habitats.
99. Landscape: the proposal adds to the 'industrialisation' of the beach area, which is far from ideal, but not considered to be additionally significantly adverse in the light of other associated beach activity.
100. Ecology: Whilst the outfall pipe will cross the Suffolk Shingle Beaches County Wildlife Site, this site will already have been removed to build the HCDF so there will be no additional terrestrial ecological impact.
101. Highways: It is noted that there is likely to be disruption to users of the Coastal Path during construction, maintenance (e.g., if blocked by shingle) and removal of the proposed temporary outfall pipe.
102. Public rights of way / access and recreation: Paragraph 4.7.3 indicates that it is proposed that the pipe would not obstruct the coastal path and it needs to be ensured that this is the case.

Temporary water storage area

103. Drainage: ESC, along with SCC, has consistently asked that the option to retain this area after construction for use as a water storage area for irrigation of agricultural land should be explored. We have yet to receive a response to this request.
104. It is unclear from the DCO changes consultation how this change of location would affect the feasibility for legacy benefit.
105. It appears that WMZ 5 is being reduced in size to account for the new location of this temporary water storage area. The consequences of this in terms of the potential impact to WMZ 5 are unknown given we have yet to see any justification for

the sizing of any WMZ's and therefore, we cannot be confident that it was sufficient in size prior to it being reduced.

106. Ultimately, both the water resource storage area and WMZ 5 have been reduced in capacity. However, we should not overlook the fact that this is to facilitate a reduction in flood risk to offsite land and property. What is the consequence of reducing the size of the two basins? There needs to be an assessment and balancing of all impacts before we can properly comment.
107. Landscape: The shift of the water storage area away from the northern edge (Minsmere boundary) is welcomed, as is its replacement with a flood mitigation area, subject to final profiling details. This remains a very sensitive area in landscape terms and over-engineered land profiling will need to be avoided, and the final details given careful consideration.
108. In general principle, the revised water storage area is preferred to the previous version, although that view is subject to details of final profiling. There was some debate previously as to whether it would be a temporary facility or left in place as a legacy benefit to local farming activity. That will need confirmation.
109. Archaeology: Archaeological evaluation complete- extensive and sensitive archaeological remains defined. Mitigation areas are still to be confirmed but will be required prior to site preparation works and any landscaping/planting.
110. Ecology: this change is tentatively welcomed as it creates the opportunity for the delivery of better ecological mitigation measures (albeit with greater initial engineering works required). However, there needs to be confirmation that the creation of the wetland area is not going to have any adverse impact on either the adjacent Minsmere South Levels (part of the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI)) or the adjacent woodland (The Grove). Particularly any potential hydrological impacts on the Minsmere South Levels need to be assessed (this is not picked up in Table 4.3).
111. Also, more details on the design and construction methodology for the proposed wetland area will be required, although some of the detail (particularly in relation to the construction methodology could be picked up via requirement).

SSSI Crossing

112. Landscape: From a landscape perspective ESC has always recognised the benefits of the causeway option because we consider it offers landscape benefits in the planting that it carries with it. However, we know that it is the least favoured option among our many ecology colleagues, and this has outweighed the landscape preference in the past. The newly proposed 30metre bridge with embankments seems to offer solutions to both landscape and ecology, and whilst it allows less planting than previously offered, we fully understand that it may well carry notable useful ecological gains and therefore we have no objections to what is now proposed.
113. Archaeology: We do not have any comments regarding the change in design to the SSSI crossing, however, archaeological assessment and mitigation will need to be factored in as this area has a potential for buried surface archaeological deposits, including wet-zone activity, waterlogged remains, as well as palaeo-environmental remains, but has yet to be subject to archaeological investigation. For surface archaeology, trial trenched evaluation and palaeo-environmental assessment required (post consent), subject to an agreed Written Scheme for Investigation and followed by mitigation as appropriate. For deeper deposits, assessment required in line with the peat strategy. Further mitigation to be decided pending results of evaluation. Historic Environment is not included in table 4.4 but should be considered as per comments above.
114. Ecology: ecologically this change will result in a better crossing structure than that currently proposed in the DCO, particularly in terms of connectivity for bats, water vole and otter, and the slight reduction in SSSI land take (although there will still be temporary land take/damage to the parts of the SSSI which will not be permanently lost). However, we consider that the change option proposed remains ecologically worse than a 'full bridge' option, particularly in relation to permanent SSSI area loss. As the DCO Environmental Statement assesses an option that is ecologically worse than the change option the terrestrial ecology and ornithology assessment rationale set out in Table 4.4 is accepted.
115. Design: it is understood that the overall height of the crossing is currently proposed at 7.3m AOD with a potential need to increase the height to 10.2m AOD at some point in the future if the risk of flooding requires this modification. Is there scope for increasing the height of the crossing at this stage? This would facilitate the passage along the watercourse for an even greater range of species than under the current change option, particularly a greater range of invertebrate species. Increasing the height now would also avoid the need for future disturbance to vegetation and landscaping on the embankment and the damage this could cause to biodiversity utilising the area. Replacement landscaping and vegetation would then have to take time to re-grow. We recognise there may be difficulties in altering the design at this

stage, but it could be beneficial. However, we would need to see a full landscape and visual impact assessment and ecological appraisal for an increased height option to ensure that this was the case.

Landscape Retention and Removal

116. Landscape: ESC has no significant concerns with the minor additional tree removal proposed.
117. Ecology: Location 1 and 2 – no comment from an ecological perspective. Location 3: this tree belt is already isolated from Nursery Covert by proposed tree/vegetation removal works and therefore it is not considered that the small amount of additional removal proposed will worsen this impact. Isolation of habitats should be addressed in post-construction mitigation and management.

Extension of order limits – Sizewell Link Road

118. Drainage: This is justified to provide a sustainable drainage strategy.
119. Landscape: No specific comment subject to more detailed assessments.
120. Archaeology: Any extension to order limits should be scoped in for archaeological assessment. Some archaeological evaluation has been completed along the Link Road, however, further evaluation is still required, to be followed by mitigation as appropriate.
121. Ecology: It is unclear whether the additional woodland loss now proposed will have an additional adverse impact on roosting, foraging, or commuting bats. This must be assessed but is not picked up in Table 5.2. It is disappointing that changes to the scheme are resulting in more habitat loss rather than less.
122. It is also noted that the proposed changes introduce several new drainage basins, these should be designed to maximise their long-term ecological potential.
123. Highways: In transport terms, ESC has no objections to the proposed highway changes set out at paragraph 5.3.9 subject to agreement of the detailed design.
124. In highway design terms, ESC has no objection to the changes to the highway drainage proposals, as set out at paragraph 5.3.11, although the following comments have been made:
- The number of highway drainage lagoons should be as few as necessary;

- The impact on the routing and amenity of Public Rights of Way must be fully assessed and relevant schedules amended, as necessary;
- If it is likely to contain standing water the need for protective fencing should be required to be assessed during detailed design;
- Access to lagoons needs to be provided to allow for future maintenance; and
- Pumping should only be used as a last resort and early discussions need to be held with SCC as Highway Authority if this road is to be put forward for adoption as part of the public highway.

Extension of order limits – Two Village Bypass

125. Landscape: No specific comment subject to more detailed assessments.
126. Archaeology: Any extension to order limits should be scoped in for archaeological assessments. Some archaeological evaluation has been completed along the Two Village Bypass, however, further evaluation is still required, to be followed by mitigation as appropriate.
127. Public rights of way and access and recreation: 5.4.22 for clarification, it was not requested that the existing public right of way route was formalised to match the route currently being walked by the public but had highlighted to SZC Co. that their order limits shown on the Rights of Way Plan sheet 18 of 27 did not cover the definitive alignment. This is in the context that at the request of SCC (as public rights of way authority), the applicant proposes to upgrade the full extent of the public footpath 3 and 11 (E-243/003 and E-243/011) to public bridleway from Farnham to Botany Farm Drive (minor road). This would be consistent with the provision of the bridge for non-motorised users proposed as the diverted route for public footpath 3.
128. ESC supports the proposals as shown in Option 1, contingent on the upgrade to public bridleway of public footpath 3 and 11 in their entirety.
129. ESC supports the proposals shown in Option 2a, contingent on the upgrade to public bridleway of public footpath 3 and 11 in their entirety.
130. ESC supports the proposals shown in Option 2b, contingent on the upgrade to public bridleway of public footpath 3 and 11 in their entirety, but only with the amendment shown below (or similar). This includes retaining the east end of option 2a, because the north end of existing public footpath E-243/012/0 is fatally obstructed by a farm building. Additional work would be required on the field headland in option 2b, to create a hardened bridleway surface to the same width and condition as exists on FP11.

131. Highways: The principle of the highway changes set out at paragraph 5.4.20 to allow for visibility at junctions is considered to be acceptable.



132. Ecology: It is disappointing that the proposed changes introduce further habitat loss, with removal of part of Nuttery Belt (which is a UK Priority habitat). The rationale for this loss is not clear in the consultation document, although it is noted that it may be avoided following more detailed design work. Table 5.3 identifies that further survey work is required (particularly for roosting bats) if part of the woodland is to be lost, this is essential, although preferably the design should be such that the loss is avoided (in accordance with the mitigation hierarchy). Paragraph 5.4.28 concludes that the loss of part of Nuttery Belt is not significant enough to alter the conclusions presented in the environmental statement, however in the absence of the identified, required, survey work it is not possible to support this conclusion at this time.

133. It is also noted that mitigation for the loss of flood plain grazing marsh (a UK Priority habitat) in the form of habitat quality improvements is proposed, although no details are provided as this will come as part of the outline Landscape and Ecology Management Plan for the scheme. In the absence of details on what improvements are proposed it is not possible to be confident that they will be adequate to mitigate the habitat loss that is identified in the Environmental Statement and therefore it is not possible to make any further comment on this at this stage.

Extension of order limits – Yoxford

134. Archaeology: No concern with regards to changes to order limits. Archaeological evaluation completed. Mitigation areas still to be agreed. Mitigation required prior to site preparation works, and construction of bunds and landscaping.
135. Highways: For Figure 5.14, we would request that SZC Co. confirm whether revised order limits are those that will be taken forward to detailed design, as the revised carriageway alignment is close to the eastern boundary of the order limits.

Changes to Southern Park and Ride

136. Landscape: Additional bunding is welcomed, and careful consideration of the management of the space around key retained trees and hedgerows will be required.
137. Archaeology: No concern with regards changes to order limits. Archaeological evaluation completed and mitigation areas defined. Mitigation required prior to site preparation works, and construction of bunds and landscaping/planting.

Changes to Northern Park and Ride

138. Archaeology: No concern with regards changes to order limits. Archaeological evaluation completed aside from trenching of the infiltration basin which added to the red line boundary at the northern end of the site at stage 4. Mitigation areas defined for the rest of the site. Mitigation required prior to site preparation works, and construction of bunds and landscaping/planting.

Changes to Main Development Site

139. Highways: Paragraph 2.3.3 includes a list of items included as the main development site; the proposed highway works on Lover's Lane and Abbey Hill as well as the Green Rail Route are not included in this list but are included in red line identified on Figure 2.1. It is assumed that these works fall under the final bullet point, but confirmation on this is welcomed. Detailed confirmation is also sought on what powers will be used for the delivery of level crossing works associated with the Green Rail Route.

Pakenham Fen Meadow habitat creation area

140. ESC welcomes SZC Co. proposals to create an additional Fen Meadow habitat creation area as it gives a greater chance of successful habitat creation being achieved.

However, it is outside of the district of East Suffolk so we will not provide any detailed commentary as that is the responsibility of West Suffolk and Suffolk County Councils. We note that this does remove any amenity value away from the affected area in East Suffolk.

Appendix: Technical input to the changes proposals: Coastal Processes

<i>Pg. no.</i>	<i>Ref</i>	<i>Relevant text / illustration</i>	<i>Observations and Concerns</i>	<i>Request for clarification, confirmation, or further information</i>	
		BLF options			
39	3.3.5	<p>Permanent BLF as proposed in the present DCO:</p> <p>3.3.5. The seabed in front of the permanent BLF, where the barges land, would need to be surveyed and potentially re-profiled between each delivery. This is to ensure the next barge can land safely on a reasonably smooth surface.</p>	Presumably this commitment would carry through to the changes. Same survey will also help to identify before/after record of changes	Request for Confirmation: Please confirm that the seabed will be surveyed and re-profiled before each delivery in the case of a new BLF.	
40	3.3.1 1	<p>Proposed Enhancement of the BLF:</p> <p>3.3.11. A potential change is to add submerged beams that span parallel to the beach on piled foundations, thereby creating a solid base on top of the seabed. A total of approximately 50 timber piles are likely to be needed, or fewer if steel is used. The addition, known as grillage, would cover an area of approximately 100m x 30m and would still allow the natural movement of sediment as far as reasonably practicable. The grillage would be removed at the end of the construction of Sizewell C.</p>	The structure, understood to stand 1m proud of the beach, is sizeable, and one would expect it to present some impedance to sediment otherwise moving alongshore. It needs to be demonstrated that such a structure, whether in use or not, will not have an adverse impact on the local shore or interfere with longshore sediment transport.	Request for more information: Please provide evidence that the grillage(s) will not have a negative impact on the local shore or impede longshore sediment transport.	

				(please see also comments re p. 157 section 1.2.7).	
40	3.3.1 7	<p>3.3.17. SZC Co. is consulting on four variants to the temporary BLF design. They are most easily distinguished by: their length; whether the barge would ground on the seabed; and the rate at which they could import material. Only Option 1 and the enhanced permanent BLF would 'land' on the beach. Potential options, subject to more detailed work and this consultation, are:</p>	Saying "land" on the beach, should this not make reference to the grillage as described elsewhere?	Request for Clarification: Please clarify whether the enhanced permanent BLF would land on the beach or upon a grillage (on the beach).	
42	3.3.2 2	<p>Option 2: Temporary BLF, short pier - low capacity</p> <p>3.3.22. Option 2, as illustrated in Figure 3.4, is essentially the same design as the enhanced permanent BLF and Option 1, but with a pier that is approximately 30m longer at around 150m. The additional length means that the seabed at the end of the pier is around -3mOD, compared with around -2mOD for Option 1. This increased depth allows barges to unload without becoming grounded and makes them less sensitive to tide conditions. The seaward end of the pier may terminate in a T-shape to allow barges to ground parallel to the beach, increasing the rate at which they can be unloaded.</p>	Would the insensitivity to tidal conditions (not grounding) possibly render the facility more sensitive to wave conditions (no breakwater)?	Request for Clarification: As noted in column to left.	

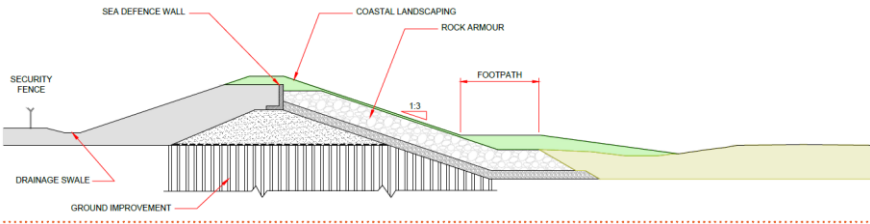
42	3.3.2 2	<p>Option 2: Temporary BLF, short pier - low capacity</p> <p>3.3.22. Option 2, as illustrated in Figure 3.4, is essentially the same design as the enhanced permanent BLF and Option 1, but with a pier that is approximately 30m longer at around 150m. The additional length means that the seabed at the end of the pier is around -3mOD, compared with around -2mOD for Option 1. This increased depth allows barges to unload without becoming grounded and makes them less sensitive to tide conditions. The seaward end of the pier may terminate in a T-shape to allow barges to ground parallel to the beach, increasing the rate at which they can be unloaded.</p>	There appears to be a contradiction in the last sentence which is saying that the T-shaped pier-end enables barges to ground parallel to the beach, but at -3mODN bed level, the barges are said to float.	Request for Clarification: There would not appear to be any grounding with -3mODN bed level – please check rationale.	
44	3.3.2 5	<p>Operation</p> <p>3.3.35. The navigation routes may require a turning circle for the barges where they adjoin the temporary BLF, with associated dredging on parts of the seabed within that footprint that rise above -3mOD. It is assumed at this stage that the same type of flat-top barges would be used</p>	We are concerned about the unstated quantity of dredging to form the turning circles as any lowering of the seabed may result in higher wave conditions at the shore	Request for Further Information: Further quantification is sought on the depth, area and quantum of dredging require for the turning circle(s).	
51		<p>Coastal Geomorphology and Hydrodynamics [With reference to the ES Volume 2 Chapter 20 (Doc Ref. 6.3)]</p>	Destabilisation of the sand bar could have an adverse impact on the coastal processes at the shore.	Request for Further Information: Please advise on impacts of dredging at the shore and in	

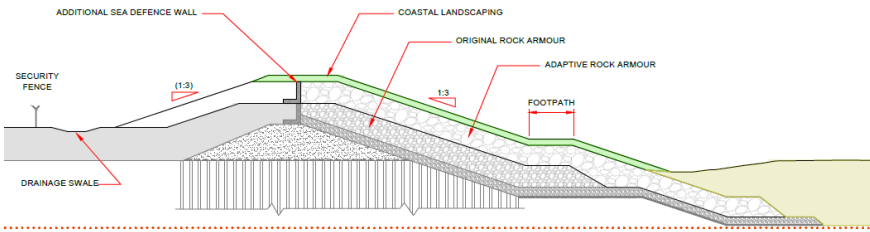
		<p>Enhanced permanent BLF</p> <p>Dredging volumes and maximum dredge depth will increase due to the grounding pocket being located further offshore and into the outer longshore bar as a result of the longer BLF deck and the barge turning circle.</p> <p>Impact extents would be significantly larger and impact magnitudes may be higher in the seaward end of the grounding pocket, potentially affecting bar stability.</p>		regards to mobility of sediment along the beach.	
52		<p>Temporary BLF, Options 1, 2 and 3</p> <p>Generally, for Options 1, 2 and 3, the impact extents would be significantly larger on the bars, and potentially on the beach, due to the wider dredging requirement on the outer bar. Impact magnitudes may be higher due to the seaward end of the grounding pocket, potentially affecting bar stability.</p>	Ditto re permanent BLF	Ditto re permanent BLF	

		<p>In addition, the higher barge occupancy could result in larger more persistent scour pits (when in-use). This would affect bar integrity and potentially drawdown of subaerial beach if scour pits form close to the beach. There is therefore the potential for moderate effects due to the wide zone of bar dredging, the effect of the grounding pocket on the outer bar, and persistent scour from more frequent barge groundings on the inner bars and the beach for both Options 1 and 2.</p> <p>For Option 3, although the barges would individually have a lesser impact because they do not ground, this would be countered by the large number of barges docking per year with potentially one barge present all of the time which is likely to lead to a moderate effect on the outer bar, which due to its less dynamic nature would take longer to recover.</p>			
			Ditto re Options 1 and 2	Ditto re Options 1 and 2	

72	Figure 4-5	<p>Figure 4.5 Temporary Beach Landing Facility Options 1-4 and Marine shafts and tunnelling</p>	This figure emphasizes the significance in the potentially affected limits under the new temporary BLF considerations.	Request for Further Information: As noted elsewhere, more information is sought regarding the impact (cumulative with the permanent BLF) of dredging on the coastal processes.	
97		<p>4.8. Change to the sea defence to make the scheme more efficient and resilient to climate change</p>			
97	4.8.4	<p>built up using rock armour, with no piling proposed. This would form the eastern part of the permanent HCDF. Site-won fill material would be placed over the rock armour and planted to soften views from the coastal path.</p>	Note that the placement and, presumably, replenishment of soil over the rocks will inevitably lead to the voids in the rock matrix becoming blocked. This could worsen with time as more soil is washed into the lower voids in	Request for Confirmation: alongside cosmetic improvements to the structure, please advise how the potentially negative impacts of	

			<p>the rock structure. The hydraulic performance of rock revetments depends on the voids being open to aid the attenuation of energy within them. Filling them up would only diminish the eventually needed hydraulic properties, potentially aggravating overtopping wave absorption and stability of outer layer rocks, whilst increasing unwanted wave reflection.</p>	<p>introducing soil to the rock revetment are taken into account and designed for.</p>	
98	4.8.7	<p>Figure 4.18 Temporary sea defence</p>	<p>The figure does not provide any dimensions, levels, or positional reference. Without quantitative detail the figure is of limited usefulness.</p> <p>A query also on the impact of the vertical wall when exposed to waves. The wall is expected to be exposed to wave action, in fact the design provides for a heightening of the wall to cater for future conditions.</p>	<p>Request for Further Information: Please provide a version of this drawing complete with levels and dimensions. Please advise the impacts of such a wall on the beach to seawards, and how this would be managed.</p>	

		<p>4.8.7. An alternative sheet-pile sea defence is proposed for the construction phase of the project, as illustrated in Figure 4.18. This alternative design has similar performance features to the construction phase HCDF within the Application, but significantly increases the amount of space within the construction site for marine shafts and tunnelling and simplifies the construction process, as explained in more detail in this section. The temporary sea defence would have a maximum height of approximately +7.3m AOD for the majority of its length and would then raise further (to approximately 10.5 AOD) to meet the SZB sea defence.</p>	<p>Being a vertical wall it would be reflective to waves. Subject to it being high enough, it has potential to be an effective barrier to sea incursion. However, this means that wave energy that would otherwise be expended at the shore will be maintained on the seaward side of the wall where it would likely cause localized erosion and suspension of sediments, leading potentially to accelerated sediment loss.</p>		
98	Fig. 4.19	<p>Figure 4.19 Permanent sea defence, operational phase</p> 	<p>The figure does not provide any dimensions, levels, or positional reference. Without quantitative detail the figure is of limited usefulness.</p>	<p>Request for Further Information: please reissue this and similar drawings complete with dimensions, levels, and positional references, e.g. in relation to MHWS line, and the SCDF.</p>	

98	4.8.10	<p>4.8.10. The design of the buried toe of the sea defence has been further progressed in response to stakeholder feedback and will now be set at approximately 0mAOD at the outset of the operational phase.</p>	<p>Without further detail on the Figure it is supposed that the 0mAOD refers to the underside of the toe. It is usual for the toe to extend below the deepest level that natural erosion can reach. Even allowing for future adaption of the defense structure, this interim level would appear to be rather shallow.</p>	<p>Confirmation required: has the security of the toe against beach losses and scour been fully investigated and designed for? What is the designed-for lowest beach level that's taken into account?</p>	
99	Fig. 4.20	<p>Figure 4.20 Permanent sea defence, adaptive design</p> 	<p>The figure does not provide any dimensions, levels, or positional reference. Without quantitative detail the figure is of limited usefulness.</p> <p>This figure more clearly identifies the coastal landscaping. There must be suitable geotextile or suitable membrane the isolate the landscaping soil from the voided rock mound.</p>	<p>Request for Further Information: please reissue this and similar drawings complete with dimensions, levels, and positional references, e.g. in relation to MHWS line, and the SCDF.</p>	

				<p>Please provide details of how the landscaping material is to be isolated from the voided rocks.</p> <p>Also please advise as per the comment on p97 4.8.4.</p>	
100	Table 4.6	<p>Coastal Geomorphology and Hydrodynamics</p> <p>There would be no change to the present-day baseline environment for coastal geomorphology and hydrodynamics (because the coastal defence is set back from the coast).</p>	<p>The installation is expected to be in place beyond the present day, i.e. for up to 190 years (?), during which time the HCDF will interact directly with the coastal processes. As a result, the HCDF has potential to have negative impacts on the coastal processes. The change to the length of the structure seawards means that any such negative impacts will happen sooner.</p>	<p>Clarification required: the Table 4.6 statement is unclear and needs to be expanded to reference the future evolution of the shore with respect to the changed length of the structure.</p>	

100	Table 4.6	The HCDF is still considered a terrestrial feature during the construction phase and will not affect coastal processes. The 5m bund would need to be managed carefully due to the seaward extension of the toe of the coastal defence.	The last point above appears to be recognized in this extract from the Table. This paragraph refers to the “5m bund” – this feature does not appear on the sketch or if it does it is not labelled as such (the SCDF?).	Clarification required: please reissue the sketches, complete with dimensions etc. and showing every feature referred to in the narrative. Please also define what “managed carefully” means. Though unintentional, the statement could imply that prior to the change the feature (5m bund) did not need to be managed carefully (clearly not the intent!).	
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100	Table 4.6	A further seaward HCDF would be a more effective sediment trap, accumulating shingle on its north side. Over time the local shoreline would reach an equilibrium and the longshore transport corridor would be largely restored.	<p>This explanation misses two points:</p> <ul style="list-style-type: none"> • The gain in sediment on one side of an extended HCDF would result in a shortfall (erosion) on the south side together with an interruption of sediment transport towards Thorpeness leading to erosion there. • In time, storm induced erosion to the north of the installation could increase the long term propensity for bay formation and a sink for unlost sediment, further reducing the sediment available to migrate south towards Thorpeness. 	<p>Request for further information:</p> <p>The explanation in the Proposed Changes document does not present a plausible argument for allowing the HCDF to become exposed to the action of the sea sooner rather than later. The brief explanations needs to be followed up by a more technically robust case for the suggested shoreline behaviour.</p>	
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100	Table 4.6	The design of the sacrificial soft coastal defence will be re-assessed to maximise its longevity before renourishment is needed (the intended mitigation mechanism).	This will be welcomed. The re-assessed SCDF need to be made available.	Request for further information: Please provide details of the new SCDF together with the rationale for its improved design to cater for the changed HCDF	
		APPENDIX 2			
157	1.2.7	1.2.7 The grillage that would be used for the enhance design and Option 1 would cover an area of approximately 100 m x 30 m. The grillage is likely to stand proud of the bed by up to a metre, and therefore would initially slow sand transport until sufficient sediment had accumulated along its sides. This would not amount to a blockage to transport because sand generally travels in suspension (especially during storms) and so would easily move over it. However, the grillage could locally affect the elevation of both longshore bars and combine with, or counter, dredging effects. Minor changes are expected close to both BLFs due to the grillage and the grounding pocket.	Further to sediment accumulating along the side(s) of the grillage, might the combined width of the grillage and trapped sand not create a calming of waves in the lee, thus potentially encouraging localized accretion of sand on the shore side.	Request for further Information: Please provide details of modelling outcomes and assessment of the impact of the grillage on the shore.	
158	1.2.8		We welcome the acknowledgement of	Request for Further Information:	

		<p>1.2.8 Option 2 would be similar to Option 1, but the T-head option for Option 2 may require more dense piling which could affect the stability of the outer longshore bar, with potential knock-on effects for the shoreline. Further modelling and assessment work would be required to understand the level of impact. There is no grillage associated with Option 2 and therefore no associated effect.</p>	disturbance to the outer longshore bar, and the pledge to undertake further modelling and assessment work.	Please provide reporting on the modelling and assessment work. To include an assessment of the issue and its resolution.	
15 8	1.2.1 1 – 1.2.1 7	<p>Dredging</p> <p>1.2.16 Using these conservative assumptions, the alongshore extent of the change in bed shear stress would be expected to extend up to 2 km. Modelling of this design may show a lesser extent in terms of area affected. Similar to the other options, the magnitude of change is likely to be very small (no more than 4%) compared to the typical baseline values on the inner bar, as described in the ES.</p> <p>1.2.17 A cumulative effect is expected if the original or enhanced permanent BLF and a temporary BLF option are in use simultaneously, as the navigational dredging areas would intersect. Cumulative effects will be assessed through numerical modelling. As a result, a minor impact on the inshore waves and subsequent small changes on the beach may occur.</p>	Notwithstanding the assurances as to the modest impact of dredging (e.g. reference to 4%) it remains that at 2km the estimated (pre-modelling) alongshore change is massive in extent. It is noted that further modelling is planned.	Request for Further Information: Given the massive extent of potential impact we welcome the undertaking of further modelling work. Please provide the reporting outcomes, including the identification of impacts on the shore, together with proposed mitigations.	

				<p>Further to the above, it is noted that plough dredging does not result in any net loss of sediment from the local system, the sea bed being scraped to obtain the desired form area and depth. The scraped material has to be deposited somewhere (somewhere close to its excavation?). Depending on the height, form and position of its deposition the sand will tend to be more or less susceptible to erosion/</p>	
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				<p>suspension / resettlement.</p> <p>Please provide further evidence to demonstrate that there will be no net loss of sediment out of the local system, or if so, a measure of the loss together with advice on its mitigation.</p>	
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Julia Pyke - Nuclear Development Director
EDF Energy – New Nuclear Build
90 Whitfield Street
London
W1T 4EZ

By email only

17 December 2020

Dear Julia,

Consultation on Proposed DCO Changes

Thank you for consulting the Environment Agency on the proposed changes to your Sizewell C Development Consent Order (DCO) Application.

Our response takes the form of three distinct sections:

1. An introduction that sets out our views on the changes submission, its intent, and the challenges that we believe it introduces, or the issues that still remain.
2. A summary of our views on some of the more significant proposed changes in relation to our role and areas of expertise.
3. A table that more specifically commentates on the proposed changes and the environmental information necessary to support them.

Introduction

We have reviewed this consultation document and, specifically, the Preliminary Environmental Information presented for each of the proposed changes and, in so doing, we have considered:

- whether the updated Environmental Assessment adequately covers the potential scope of environmental impact, and
- whether the Next Steps and Further Assessment is comprehensive enough

Also, where possible, we have also indicated an estimated timescale that we think shall be necessary for our review of respective evidential documents. This information is presented in the table at the end of this letter.

As the proposed changes consultation document does not contain sufficient evidence to determine environmental impacts, we have not formed any conclusions, or favoured any options. Instead we have approached this consultation as a scoping exercise for the information that is still to come and identified if we agree with your view on what this must address.

We do understand the ambition behind these changes, and welcome your desire to address some of the feedback that you have received on certain matters – transport impacts on Suffolk's roads for instance. However, we are now very concerned that your changes introduce some significant new proposals. Changes that will necessitate some very extensive and time intensive assessment (we have

made some estimates of minimum time-scales below) and a review of substantially new, or revised, evidence to support your conclusions. Assessing the awaited information will be a challenge to conclude in the time now available and it may well not prove possible within the statutory timescale of the DCO.

We have participated over many years, in the pre-DCO application engagement and consultation process. We hoped that this would ensure that your DCO application would be submitted with proposals on which we were in agreement. It was our ambition to have agreed common ground with you on those areas in which we are a statutory consultee. This proved not to be the case at the point that the DCO application was submitted. We are working positively with you now to close the gaps and find common ground where we can. However the introduction of these changes, at this incredibly late stage in the DCO decision making process, makes the possibility of our arriving at common ground - ahead of the DCO examination commencing - on these new matters of significant interest, very unlikely indeed. In addition it may well mean that areas on which we were close to agreeing common ground are actually set back.

We are not saying that common ground cannot be achieved. But when we consider your changes to the Beach Landing Facility (BLF) and the proposed additional marine infrastructure (for example), we are of the view that the time it will take to complete the assessment steps necessary to identify any potential impacts on coastal processes caused by your proposed options, will last some weeks, and could extend to months. This could severely limit our ability to effectively contribute to the DCO Examination process, especially if it commences before we have concluded our review of the information you are yet to submit. This risk will only worsen if the necessary environmental information is not available at the time you submit your DCO changes application to PINS in the New Year.

The concern we have, and have endeavoured to exemplify above, centres mainly on process and the ability for us (and the wider community who must review your proposals) to do so in an adequate and timely manner. We would expect to properly participate in the forthcoming Examination process, so that we might give the Planning Inspectorate (PINS) assurances that they can confidently take account of the environmental information you submit and the conclusions you reach as a result. We cannot do so if adequate time to review and assess your information is not made available, and we shall therefore be interested to learn how PINS will ensure that the necessary environmental information has been publicised and has received appropriate sufficient scrutiny in advance of the DCO Examination in line with the Planning Inspectorate's Advice Note 16¹.

¹ "The government recognises that there are occasions when applicants may need to make a material change to an application after it has been accepted for examination. Sometimes a change may result from the publication of new/ emerging government policy or on-going negotiations between an applicant and other Interested Parties...The justification for making a material change after an application has been accepted for examination must be robust and there should be good reasons as to why the matters driving the change were not identified and dealt with proactively at the Pre-application stage. Before an applicant makes a material change request it should carefully consider how it will impact upon the other Interested Parties and the Examination Timetable"

Summary of our views on the changes proposed (where required, otherwise see table 1 below).

SSSI Crossing

We are pleased that you have responded to feedback in relevant representations, and we do welcome the improvements you have made to the design of the SSSI crossing by introducing a partial bridge design. However, there do still remain outstanding challenges regarding compliance with the Water Framework Directive (WFD) that your new proposal still does not overcome.

The proposed change to the main development site entrance - where it crosses the Leiston Beck waterbody (designated main river²) - to open up the previously proposed causeway structure (as it straddles the river and SSSI), is certainly an improvement. In addition to reducing the required land take from the SSSI it is likely that this proposed change will improve connectivity for water vole and otter to an acceptable level and significantly reduce the risk of habitat fragmentation. This form of crossing design will also likely improve connectivity for some invertebrate species.

However, it will not provide sufficient light levels under the crossing to facilitate the passage of numerous polarotactic invertebrates (those species which use polarised light reflected from water for navigation). As a consequence the proposed crossing design may still represent a risk of deterioration to the WFD status for invertebrates within the Leiston Beck. It is our view that the risk of such a deterioration could be greatly reduced by increasing the height under the partial bridge crossing. We would consider the minimum height under the crossing necessary to mitigate this risk to be >6m. We do not believe that the use of day lighters, or artificial lights, placed under the crossing could effectively - or reliably - address this issue and might even potentially compromise connectivity for other species.

We understand that the overall height of the crossing is currently proposed at 7.3m AOD with a potential need to increase the height to 10.2m AOD at some point in the future if the risk of flooding requires this modification. We would prefer to see the crossing sited at this level from the outset, for 2 reasons:

- Firstly, raising the height at the initial design stage would present the opportunity to increase the height under the crossing, facilitating the passage along the watercourse for a greater range of invertebrate species. This would enable us to consider the risk of deterioration to invertebrates under the WFD as nullified and so overcome the potential for WFD compliance failure, which would otherwise trigger the need for an article 4.7 exemption.
- Secondly, given the complexity and timescale involved in establishing good vegetation and landscaping on the SSSI embankment and crossing, and the disturbance it would cause to the ecology utilising the area if the causeway height is increased, we would much prefer any second period of construction

² Any structure constructed within, and over, a designated main river will require a flood risk activity environmental permit from us, prior to any work commencing. The application will be assessed for compliance with the Water Framework Directive.

and disturbance to be avoided in the future, especially once the vegetation has become established to a functional point.

As we have already said, we do recognise the efforts to which you have gone to mitigate the various environmental and ecological impacts that were present within your originally proposed culvert crossing arrangement and this arrangement is certainly an improvement. However, we are duty bound to consider whether it meets the tests of the WFD for status compliance and, at this time - with this design - this has not been demonstrated. In our view, opportunities exist to achieve compliance, but they would require further design changes.

There is no doubt that the best crossing option that could ensure the least amount of harm to the SSSI, and provide the most successful compliance with the WFD, remains that of the three span bridge design; our preferred option when we were discussing this some years ago. This design has the smallest proposed land take from the SSSI at 0.19ha and the narrowest width over the Leiston Beck waterbody at 35.5m, enabling the movement of all species present along the watercourse.

Additional Beach Landing Facility (BLF)

In our response to the original DCO submission, we stated our view that the coastal geomorphology and hydrodynamics workstream was fit for purpose, subject to continued refinement of the Monitoring and Mitigation Plan and provision of detailed designs for the Hard Coastal Defence Feature (HCDF). We were in fact very close to agreeing common ground on this workstream.

In light of the proposed changes to coastal infrastructure, it is now our view that the assessments, as previously provided, can no longer be considered fit for that purpose. We are therefore unable to offer an informed judgement on the potential risks posed by these new design options until we have reviewed the necessary detailed modelling and environmental impact assessment evidence identified for future submission.

In further conversations with yourselves, about the options you are pursuing, it has emerged that a more substantial version of the temporary BLF Option 4 design has potentially been forming as another option that you are considering, one which would be founded on piles as its design basis. Despite it not having been clearly included as an option within the consultation, we do note your assertion that such an option is technically included within the scope of the existing changes document by your reference to ongoing feasibility studies to inform final design – *"Any change from this technology, such as any need for additional piling, would be determined prior to the submission of our formal application for a change to the DCO Application and assessed accordingly"*. Whilst we acknowledge that this may be an option that you might bring forward at the time of your changes submission, we wish to make it clear that it is very difficult indeed to provide any advice - or venture an opinion - on such an option, when it is clearly not presented as a specific proposal within this consultation, and for which no assessment of environmental effects or next steps has even been offered.

Generally speaking, we anticipate that any new design options will require a substantial amount of work in order to fully consider a range of potential environmental risks, including (but not limited to):

- Disruption of the nearshore bars which act as the primary sediment transport conduit in the Greater Sizewell Bay
- Wave shadowing and / or focusing, and potential resulting impacts to nearshore and intertidal morphology

Hard Coastal Defence Feature (HCDF)

The Adaptive HCDF design extends further onto the foreshore than previously proposed and is therefore likely to be at greater risk of exposure given the seaward extension of the structure. We expect that the impact on coastal processes might therefore be experienced sooner and potentially with greater severity than the original indicative design. This will also require further assessment. The information to support the assessment of risks and consequences will need to be provided, reviewed and conclusions drawn; and any environmental threats will need to be reflected in the Monitoring and Mitigation Plan.

Flood Risk Assessment (FRA)

The proposed change to the SSSI crossing has implications for flood risk, as does the increased height of the HCDF.

As you already know from our Relevant Representation, and ongoing engagement with you, the FRA submitted with the DCO is currently insufficient, as based upon the design as it had been submitted. This matter remains unresolved at this time.

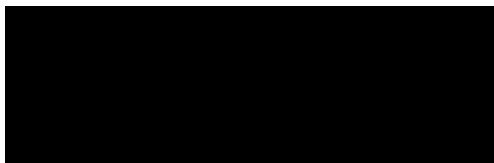
The Preliminary Environmental Information presented in this document claims that flood risk will be reduced as a result of both the proposed change to the SSSI crossing, and the proposed change to the sea defence. If so, this would represent an improvement on the designs as submitted within the DCO. It is important to note, however, that these proposed changes now necessitate amendments to the FRA, and not just to the FRA itself, but also the modelling that underpins the evidence base on which the FRA is founded. This represents another significant quantity of work for us to assess, post DCO submission, on top of that which we are already working with you, in order to overcome our outstanding concerns regarding the FRA – as submitted at the time of the DCO.

As we have not yet received any of the additional FRA work necessary to support your DCO changes, we cannot be confident that we will be able to form any conclusions on it within the statutory timescales of the DCO process.

We trust that the views offered here can convey an honest account of the challenges your proposed changes represent in terms of the work that must still be concluded, if we are to properly understand their implications. We also hope that the advice provided will prove useful to you in progressing these options further, and - as always - look forward to engaging with you further.

Please refer to table 1 below for our detailed response to the above, and the wider selection of proposed changes.

Yours sincerely,



Simon Hawkins
East Anglia Area Director

Environment Agency
Iceni House, Cobham Road, Ipswich, Suffolk IP3 9JD

OFFICIAL

Table 1			
Proposed Change	Advice of the scope of the Updated Environmental Assessment	Advice on the Next Steps and Further Assessment	Timescale for future EA Review of Evidence Base³
Additional Beach Landing Facility options to facilitate material imports by sea	Flood Risk		
	The permanent and temporary BLF must be considered in the Flood Response Evacuation Plan, which in itself must be based on correct evidence within the FRA		Two weeks following our review of the FRA.
	Marine Water Quality		
	The scope is correct in terms of the proposed additional modelling to assess impact of increased dredging and pilling		1 month from receipt of reports assuming reports cover all areas of concern
	Coastal Geomorphology		
		Needs full assessment of impact of both structure options and dredging requirements upon coastal processes, particularly associated with impacts to the outer longshore bar, and indirectly on beach morphology. The increase in dredging requirements are particularly significant due to the wide zone (<600m) of bar dredging and needs careful consideration. If backhoe dredging emerges as preferred	The scale of impacts is variable depending on the chosen option, and consequently the time taken to review the model and

³ This column is an estimate of the minimum length of time the Environment Agency would require to review evidential documents. It does not include your time in producing these documents, and timescales may be considerably exceeded if there then remains significant further adjustments required by yourselves, and subsequent re-review steps by us in the process.

		option then beneficial local use of material on adjacent shoreline should be considered an essential activity.	subsequent assessments may exceed 3 months.
	Ecology		
	<p>The timing of temporary and permanent BLF construction times is assumed not clearly stated and so the underwater construction noise impacts may not be worse case. The new temporary BLF could be a considerable length (particularly with design options 3 and 4 and compared to the permanent BLF structure) and there is still uncertainty about the amount of piling needed with options 3 and 4. There is potential for extended period of underwater disturbance which is not yet known.</p> <p>Table 3.7 Acknowledges fish as a receptor but makes no reference to possible impacts of additional construction and dredging disturbance on fish receptors. Given the uncertainty in the design needs underwater noise impacts on fish should remain part of the updated assessment.</p> <p>Provide an update of potential impacts to priority habitats that could be affected the different options being proposed.</p>	<p>To ensure the assessment is appropriate, more information needed on the design requirements - piling and dredging needed for these options.</p> <p>Given the uncertainty in the temporary BLF design and the possibility that underwater noise impacts are increased, the impacts on fish should be part of the updated assessment, including as part of an in-combination assessment.</p> <p>Fish should be considered as prey for protected SPA and SAC features, but also as receptors in their own right and elements of the WFD.</p> <p>Assessment of potential impacts to priority habitats, this should include permanent and temporary losses of habitats.</p>	Two months

Change to the detailed location of the Water Resource Storage Area and the addition of flood mitigation measures to lower flood risk	Ecology		
	If this area is used to provide compensation for the loss of wet woodland habitat for invertebrates then its functional connectivity to ditch, reed and fen habitats will need to be demonstrated. If this compensation area is not sufficiently connected it will not provide the same benefits to invertebrates as that being lost from the main development site and SSSI crossing.	Provide an assessment of the functional connectivity to the relevant surface water systems and habitats necessary to support the invertebrates impacted by the development.	1 month receipt of required documents.
	Flood Risk		
		Update to FRA and modelling required to determine if change to offsite impacts. Potential breach in embankment proposed to be modelled. FRA of proposed reservoir breach to be reviewed by local authority.	2 months from receipt of modelling and reports
Change to the SSSI crossing design to a single span bridge with embankments	Ecology		
	An updated assessment of potential changes to WFD biological and hydromorphological quality elements should be provided in relation to the proposed changes. In addition to potential changes of impacts to protected species an updated assessment of potential changes to supporting features of designated sites such as wet woodland and designated habitats such as priority habitats should be provided.	Water framework directive - impacts to invertebrates: The proposed change to a single span bridge is an improvement from the culvert option and will likely improve passage for some species, however it is unlikely to facilitate the passage of numerous polartactic invertebrates species present which contribute to the WFD invertebrate classification in the Leiston Beck, we recommend increasing the height underneath the crossing as much as possible to allow increased light penetration under the crossing. Hydromorphological quality elements assessment should be updated and include assessment of potential changes to quantity and dynamics of flow and connection to ground water bodies. Habitats - An assessment of potential changes of impacts to habitats	Further design change required; height under bridge should be increased. 1 month from receipt of the required documents.

		that support the features of the SSSI or that are listed as designated habitats should be provided.	
	Flood Risk		
		Update FRA is a significant update. Modelling of proposed structure required and impacts throughout flood cell to be understood. Both onsite and offsite impacts and mitigation to be updated.	Variable depending on the quality and completeness of the model, modelling reports and FRA. A minimum of two months.
Surface water removed early in the construction process to be discharged to sea via a temporary marine outfall	Marine Water Quality		
	The need to assess impact on water quality of coastal waters has not been identified.	Sediment and other potential contaminant discharge to shore needs to be assessed. Lack of settlement prior to discharge also needs to be considered. A discharge permit will be required. This is a significantly different discharge to that from the CDO and needs to be considered accordingly. An H1 assessment would need to be completed, and modelling of discharge to coastal waters may also be required.	A minimum of one months following receipt of marine modelling reports.
Change to the sea defence to make the scheme more efficient and resilient to climate change	Flood Risk		
	There has been inconsistency between the design crest levels for temporary and permanent defences presented in this document and in meetings, so clarity must be provided.	Update to FRA required to demonstrate safety from coastal flood risk. Clarity of design proposals for both temporary and permanent HCFD. It is unclear where there are implications for the fluvial model as well, and when that will be provided to the Environment Agency.	Two months from receipt of modelling and reports

	Coastal Geomorphology		
		This consultation only offers high level indicative details of sea defence design so does not fulfil stakeholder feedback regarding HCDF design. In addition to re-assessment of SCDF, further modelling should be undertaken to establish likely timings of interaction of new HCDF design with coastal processes. This will inform EA monitoring and management of any necessary work programmes for adjacent shorelines.	A likely minimum of two months, depending on the nature of the modelling provided.
Extension of the Order Limits to provide for additional fen meadow habitat at Pakenham as compensation for fen meadow loss	Ecology		
	In addition to the assessments highlighted consideration needs to be given to the Eel Regulations 2009	Whilst we support the addition of fen meadow compensation, an assessment of potential impacts to the movement of fish and eel will need to be provided, any water control structures will need to be compliant with the Eel Regulations 2009 and should facilitate the passage of fish and eel along the watercourse.	One month from receipt of documents
Extension and reduction of the Order Limits for works on the Sizewell Link Road	Ecology		
	Pathways of pollutants to surface waters has changed - An updated assessment of potential changes to WFD biological and hydromorphological quality elements should be provided. An updated assessment of mammal passage through the watercourse crossings during elevated flows should be provided if this proposed change has altered flood modelling predictions.	The use of attenuation basins which discharge to watercourses could alter impact pathways of pollutants to surface waters, provide updated assessment of potential changes to WFD biological and hydromorphological quality elements. Design consideration should be given to maximise the benefits to ecology wherever possible, the basin designs should incorporate gently sloping sides with appropriate planting and an undulating bottom which retains wet areas throughout the year.	One month from receipt of documents

SLAF
Suffolk Local Access Forum

FREEPOST SZC CONSULTATION

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Your Ref:
Our Ref: BH/AM/SZC1412
Date: 14th December 2020

Dear Sirs

Re: SLAF comments on latest Sizewell consultation

We note that there are three positive statements in the latest consultation, these are:

- We support the inclusion of the proposed bridleway link between Aldhurst Farm and Kenton Hills is now to be part of the DCO rather than part of post construction funding (2.3.29). Road crossings should be at a safe point.
- As part of the two village bypass we note the upgrade of the public rights of way to a bridleway at Walk Barn Farm which also includes Footpaths 3 and 11, we have no specific views on either of the 2a or 2b alternatives (2.5.7), (5.4.22).
- The removal of the Sizewell B Outage Car Park from Pillbox Field thus alleviating conflicts between Bridleway13 and the proposed new vehicular access is welcomed. (4.2.4).

We do however wish to comment on some other issues which still cause SLAF concern:

- Permanent Beach Landing Facility (3.3.1) – As the consultation now expects greater use of materials brought in by sea to an improved beach landing facility SLAF would expect any closure of the Coast Path because of additional deliveries during Sizewell C construction period to be kept to a minimum. Although we do welcome the commitment to keep it open as far as is practicable, especially as these deliveries will be between April to October which coincides with the peak tourist season, we have already in previous consultations expressed our concerns about the length of the proposed diversion route.
- Temporary Beach Landing Facility (3.3.15) - We note that this will be a conveyor belt crossing above the Coast Path to deliver aggregates so causing little disruption to the passage of pedestrians. SLAF would however expect that measures would be taken to ensure public safety and minimise visual; dust and noise pollution as far as is practicable to those using the path.

- Changes to sea defences (4.8) – SLAF have in past consultations commented on the proposed new sea defences to protect Sizewell C and the effect they would have on the long-term future of the Coast Path due to issues such as storm surge, sea level rise and coastal erosion. We have always requested that the definitive route should be placed on the top of the sea defences to avoid such uncertainties, although it would not preclude public access between the toe of the defences and the sea. We note that this would not be possible with the temporary defence proposed during the construction phase but would ask that this is reconsidered when the permanent defences are constructed.

Yours sincerely



Chair of Suffolk Local Access Forum

From: [REDACTED]

Sent: 17/12/2020

To: sizewell@edfconsultation.info

CC: [REDACTED]

Subject: Greater Anglia response to Sizewell C consultation - December 2020

Dear Sir/Madam

In response to the latest consultation on Sizewell C we have three main points :

1. In principle, we are supportive of rail freight playing a significant role in the construction programme.
2. However, we are opposed to any detrimental impact on the passenger services on the line. As a direct consequence of introducing an hourly service on the line we have generated an increase in passenger journeys of over 100%. With new trains now in place, we have the opportunity to grow patronage further in a manner that not only meets local community, social, tourism and economic needs, but also supports wider decarbonisation targets.
3. We believe more investment should be made in rail infrastructure improvements on both the south and north sections of the East Suffolk line to enable better services for passengers and communities in the future, with the ability for more employees at the site to access it by rail, not just in the construction phase, but in the operational phase, too.

A more detailed response, fleshing these points out in more detail is attached.

We are very happy to talk further and in more detail about these issues in direct meetings, if that would be helpful.

Kind regards

Jonathan

Jonathan Denby
Head of Corporate Affairs

[REDACTED]

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Greater Anglia Response to Sizewell C consultation – December 2020

Introduction

As highlighted in our response in September 2019, Greater Anglia is the local passenger train operator in East Anglia. We run the scheduled train services on the East Suffolk Line between Ipswich and Lowestoft, as well as local services between Ipswich and Felixstowe and Lowestoft and Norwich, intercity services on the Great Eastern Main Line (GEML) between Norwich, Ipswich and London, and other regional services between Ipswich and Cambridge/Peterborough and between Norwich and Cambridge, Sheringham and Great Yarmouth.

The potential use of the East Suffolk line in the construction of Sizewell C has a multitude of implications for our current and future services. We welcome the proposal to maximise the use of rail infrastructure providing it prevents any disruption to existing train services, but we have some comments on how we ensure that aim is fully realised, whilst at the same time creating a rail legacy that benefits East Suffolk line customers, communities and the Sizewell C scheme. However, before going into more detail I want to summarise our main points, which are as follows :

1. In principle, we are supportive of rail freight playing a significant role in the construction programme.
2. However, we are opposed to any detrimental impact on the passenger services on the line. As a direct consequence of introducing an hourly service on the line we have generated an increase in passenger journeys of over 100%. With new trains now in place, we have the opportunity to grow patronage further in a manner that not only meets local community, social, tourism and economic needs, but also supports wider decarbonisation targets.
3. We believe more investment should be made in rail infrastructure improvements on both the south and north sections of the East Suffolk line to enable better services for passengers and communities in the future, with the ability for more employees at the site to access it by rail, not just in the construction phase, but in the operational phase, too.

We are very happy to talk further and in more detail about these issues in direct meetings, if that would be helpful.

Greater Anglia East Suffolk line context

Since an hourly service was introduced on the East Suffolk Line in two phases in December 2010 and December 2012, passenger journeys on the route have increased by over 110%. We have now replaced the previous regional train fleet of 1,2 and 3 carriage trains with brand-new 3 and 4 carriage trains with more seats, air conditioning, plug points, USB ports, fast free Wi-Fi, a quieter, smoother ride and improved accessibility. That process was completed in February 2020.

This transformation is expected to prompt further significant increases in patronage, as we move beyond the current challenges presented by the pandemic. It is therefore essential that nothing is done, either deliberately or inadvertently, that adversely impacts on current or future growth in patronage. It is also in everyone's interests along the route that we continue to maximise the use of the East Suffolk line.

Specific response to the Sizewell C consultation

We fully support the proposal to maximise the use of rail transport both during and after the proposed construction of Sizewell C. However, whilst we have no problems with the rail infrastructure upgrades proposed, we do not believe they go far enough.

As highlighted previously, we believe full dualling of the rail line from Woodbridge to Saxmundham is the practical, sensible solution which enables the provision of both existing services without disruption and a more frequent, half hourly service in future.

Such an approach prevents damaging disruption to existing services both on the East Suffolk Line and the GEML, when there are delays to the “construction” trains. The Ipswich area is already very, very, busy currently, with both passenger trains and an increasing number of freight trains to/from Felixstowe. That congestion is only going to increase. We cannot afford to have further knock-on delays due to congestion on the East Suffolk Line rippling back onto the Felixstowe line or Ipswich area. With some single line sections still in place on the Felixstowe line and on northern sections of the East Suffolk line, retaining the current single line section south of Saxmundham is not practical.

Providing two tracks for this key section also supports local community aspirations for minimal or no overnight trains and minimises the need for truck traffic and additional road provision.

Furthermore, a better rail service carrying more passengers helps achieve a lower carbon economy, reducing road and car usage. In that respect, it underpins Sizewell C’s sustainability credentials, as well as, contributing to the wider sustainable development of the local economy in East Suffolk.

Previous proposals referred to certain level crossing upgrades, but we also need the line speed on the East Suffolk line increased to 90mph, to take full advantage of the capabilities of both the new bi-mode trains in use on the line and the freight locomotives that will haul the freight trains to support the construction. This move will increase service resilience and help reduce journey times, thereby generating even more patronage on the East Suffolk line services, meeting an existing local aspiration for quicker journey times on the route (making it an even better alternative to the A12) and reducing the need for some road upgrades.

Given the completion of the Sizewell A de-commissioning works that required freight paths on the East Suffolk line, we also wish to see the release of those paths to enable the provision of a “clockface” frequency all day on the line, which is more convenient for and attractive to existing and potential rail passengers. Such an aspiration is shared by current customers, local authorities, the local Community Rail Partnership and rail user groups.

Finally, we would also seek to see the optimisation of the rail proposals by having an additional loop and other improvements implemented on the northern section of the route, agreed with and through Network Rail to ensure we fully optimise the solution to give the best reliability, resilience, capacity and journey time benefits, to provide both a robust, resilient diversionary route for the freight traffic and the capacity for additional passenger services to further maximise rail usage during both the construction and operational phases of Sizewell C’s life. As mentioned above, the exact proposals would be the subject of joint work with Network Rail to identify the best and most effective initiatives.

In summary, we see a major opportunity to not only meet the aspirations of the Sizewell C project and EDF's aims and objectives, but also those of local communities, rail passengers, train operators, local businesses, the local economy and local/regional tourism, by delivering the rail upgrades outlined as part of the Sizewell C project proposals and those additional rail upgrades we have outlined in this submission.

Such an approach would result in the added benefits of increased rail travel, reduced road use, a reduced requirement for road upgrades and a greater contribution to the carbon reduction impacts of the Sizewell C scheme.

Jonathan Denby
Head of Corporate Affairs
Greater Anglia
17 December 2020

Sizewell C

Change of Consultation (11254)

Submission by Nacton Parish Council

Nacton Parish council responded to previous consultation stages undertaken by EDF, and has also submitted a Relevant Representation on the application for Development Consent. The 'Seven Hills' interchange is a roundabout on junction 58 of the A12, which is located immediately to the south east of Ipswich. Nacton Parish is located near the Seven Hills roundabout and will be affected by the route that the lorries take in order to reach the freight management facility at Levington (FMF) and then to return to the same roundabout. The number of lorries likely to follow this route is considerable and will affect the parish. Whilst the main part of the village will be some distance from the main development site, it is disproportionately impacted by the closeness of the proposed FMF, which will potentially severely worsen several existing poor aspects of the current local road network.

- 1) Whilst there are positives concerning the re-consideration of rail and sea usage and the resultant possible decrease in HGV usage from 60% to 40%, other points remain unconsidered. The reduction of HGV movements from 60% to 40% is dependent upon which of the rail and sea options are fully maximised. If chosen, some of the rail and sea options combined would not manage this level of reduction.
- 2) Initially EDF stated that if 7 trains were used for Sizewell C, then a FMF would not be required. No sound reason has been given for this not to happen. The possibility of 4 trains is suggested, why cannot this be increased?
- 3) Also, Nacton PC supports the idea of increasing usage of a temporary beach landing facility, if it meant a reduction in HGV usage.
- 4) It is difficult to understand why the FMF is proposed at a site which would mean HGVs have to drive away from the Sizewell C site in order to reach it. Why, if there proves to be a need, isn't the FMF located alongside the A12 nearer to the Sizewell site. E.g. Has a consideration been given to using the Park and Ride at Martlesham?
- 5) No consideration has been given to upgrading the route that the HGVs would have to take, in order to reach the FMF from the A14. This is despite:
 - a) The HGVs would have to pass a busy crematorium both ways. Some funeral corteges turn right into the crematorium across the traffic.
 - b) The main designated cycle path from Ipswich to Felixstowe runs down the Old Felixstowe Road, which the HGVs would take, again one way cutting across traffic.
 - c) The T junction with the Old Felixstowe Road and the A1156, has seen several accidents, including fatalities over the last 5 years and no doubt beyond that. Traffic travels quickly from Ipswich round a bend.

- d) Nacton Home Farm manage land throughout the area. Their tractors regularly use the road network that the HGVs would use. Traffic flow is already affected by this.
- 6) The East Suffolk CC Local Plan urges everyone to move freight by means other than road. The current proposals will mean that improvements to both road and rail networks will be needed, together with the building of FMF. It would make more sense to concentrate effort and cost to upgrading the East Suffolk line, something that would provide a legacy for the future.
- 7) The proposed number of lorries using the FMF is being reduced. There is no proposal to proportionally reduce the size of FMF.
- 8) It appears that a web-based Delivery Management System is not being considered. No reason has been given.
- 9) With a modern and efficient freight system coupled with a reduction in HGV movements would it not be better to solely use the available space at the Southern Park and Ride site and dispense with the site at Levington?

In summary, we welcome efforts to increase the use of rail and sea to move freight if it reduces the number of HGV movements, but we want to see more information about the potential consequences for the proposed FMF before commenting fully.



17th December 2020

Dear EDF Energy

Sizewell C DCO Changes Consultation

On behalf of Felixstowe Town Council, thank you for inviting feedback on the DCO Changes relating to the proposals for a new nuclear power station at Sizewell.

The Town Council has considered those elements of the Change document which directly or indirectly relate to the three areas of concern raised in our previous submission to the DCO consultation.

We retain all of the concerns outlined in our previous submission, notably in regard to the A14/A12 at Seven Hills and further north, which have not been addressed and request that that be retained on record and consideration given to our proposals therein. The Council remains of the view that cumulative impacts relating to Sizewell C and other developments will necessitate a significant upgrade of the Seven Hills junction.

However, beyond that, we greatly regret that not only do the changes now proposed not address any of the issues raised by this Council, but indeed directly further exacerbate them, in particular the issue of Rail Capacity.

Accordingly, we are concerned that the current document presents no further or clear evidence that either the original or revised Freight Strategy demonstrate that rail capacity west or south of Ipswich can be provided without further constraints on capacity available for the large unmet demand for freight capacity from the Port of Felixstowe and its customers in the haulage and logistics industry. That demand was confirmed in very recent conversations with the Port company.

We suggest with increased emphasis that in the wider interests of the UK, regional and local importance of the Port of Felixstowe, the Strategy should not be accepted by the Planning Inspectorate in the absence of that evidence.

Conversely however we welcome the innovative proposals for potential significant increases in deliveries to and from the Sizewell site by sea, in particular the largest of the four options proposed for an Additional Beach Landing Facility. This appears to us to offer a much better opportunity for the reduction in HGV traffic desired by all parties.

We would further propose that consideration should also be given to the opportunity for potential enhancement of that concept to accommodate not only bulk material movements, but also container movements, which could make substantial further additional reductions in HGV traffic on the A14, and A12 and the local junctions on that route.

Yours faithfully,



Ash Tadjrishi
Town Clerk to Felixstowe Town Council

17/12/2020

Dear Sir/Madam

The Board has reviewed the Consultation Document; Consultation on Proposed Changes (November-December 2020) and has the following comments to make.

The development area is partially within the Internal Drainage District (IDD) of the East Suffolk IDB and the site is wholly within the watershed catchment of the aforementioned.

For an overview, maps are available on the Board's webpages showing the IDD (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf) as well as the wider watershed catchment (https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf).

ID 6 - Crossing over Sizewell Marshes SSSI

While the Board is theoretically supportive of the broader strokes of this change (changing from a culvert to a bridge) the applicant has assured the Boards officers that the works will be on and around the Main River only and thus no works are currently proposed to ordinary watercourses within the Board's Internal Drainage District. Therefore the Board has no formal comment to make on this change. If there are any further changes to be made at a later date, the Board would like to be aware of these.

ID 2 - Changes to the Beach Landing Facility and ID 9 – Changes to the Hard Coastal Defences

The Board is concerned that both of the above changes could lead to a change in coastal geomorphology resulting in the potential for increased sedimentation to the North of the site. Any such effect could have significant consequences for the entire catchment served by the Minsmere Sluice as additional sedimentation could hamper the outflow from this already tide locked gravity operated Sluice. Considering this, and the applicants own statements that the "Permanent BLF Options 1, 2 and 3 could lead to moderate, significant effects on the shoreline" (Table 3.7, page 51) and the "further seaward HCDF would be a more effective sediment trap accumulating shingle on its north side" (Table 4.6, page 100) the Board requests that an appropriate contingency plan be produced in the event that there is a detrimental impact on the Minsmere sluice in the future.

Jane Marson (Chairman) Michael Paul (Vice-Chairman)
Phil Camamile (Chief Executive)

Cert No. GB11990

Cert No. GB11991

As previously stated in the Board's Relevant Representation, the lack of access to infiltration data and the calculations/models used to estimate appropriate water storage/flow volumes frustrates the Board's efforts to fully consult on any water/drainage related plans with any degree of certainty. The Board once again requests that this information be shared. However, based on the limited information presented, the Board has the following comments regarding changes ID5 and ID8.

ID 5 – Change to the location of the Water Resource Storage Area (WRSa) and the addition of flood mitigation measures to lower flood risk.

The Board has several concerns and questions regarding this change:

- The Board is interested to know where the water for the WRSa will be sourced and how it will be transported to the WRSa.
- Figure 4.8 of the changes document indicates that there will be a connection from the Eastern side of the WRSa to the existing surface water network in the area. The Board requests more information on the function of this connection, whether it is for discharge or abstraction.
- Any surface water discharge from the WMZ 5 to the WRSa and thence into the wider system would likely require land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- The WRSa is located very close to the Board adopted Drain 7. All works within 9m of the bank of the adopted watercourse will have to be approved by the Board under Byelaw 10 to ensure that it does not affect maintenance and accessibility of the watercourse. At the current level of detail, the Board is unable to advise as to the acceptability of the proposed works.
- The Board would like to be informed of the results from the proposed investigations into the effects of a potential breach of the WRSa (Table 4.3).

ID 8 – Surface water removed early in the construction process to be discharged to sea via a temporary marine outfall

The Board accepts discharging the main development area to sea once confined by cofferdam however we are concerned by the proposal to immediately begin discharging surface water to the sea. The Board is of the understanding it is not necessary from a pollution perspective to begin this so early, and the Board has also been informed that it is possible that WMZs 1 and 2 will be discharged to the sea along with WMZs 7, 8 and 9.

While the Board understands the need for a contingency plan during extreme events it seems unreasonable that a 1 in 30 year rainfall event within WMZs 1 and 2 (and possibly more frequent events for WMZs 7, 8 and 9) cannot be safely managed in such a way as to sustain the water balance within the wider system. The proposed approach has the potential to cause a nett deterioration in available ground water that issues spring water into the surface water systems. This base flow is important to ensure resilient ecosystems during the summer and/or prolonged drought periods.

The applicant has informed the Board that there will be ongoing monitoring of all discharges via this route, and that changes can be made if deemed necessary. The Board would be interested to know what the criteria for any changes would be, what those changes might be and how they would be accommodated. The Board would also be interested in receiving the data collected as part of these works.

Holistic approach

The Board remains concerned that the applicant is not sufficiently considering the catchment in a holistic manner and thus missing out on potential synchronicities which could be highly beneficial to the catchment and those who rely upon its function both now and in the future.

The semi-point source flood risk mitigation measures could be reconsidered. The Board continue to advocate to the applicant that they should consider taking a catchment-based approach to mitigation, especially to the hydraulic effects from the proposed SSSI crossing. There are opportunities to re-engineer the upstream river catchment to repair historically heavily modified watercourses. Such works could slow the flow and reduce downstream impacts, increase connectivity to the flood plain, clean the river flows, lock up carbon, provide environmental enhancement and increase groundwater recharge potential. This approach is consistent with best practice eco system services for public good, in line with the Government 25 year Environment Plan and compatible with pending arrangements for landowners; the Environmental Land Management scheme (ELMs).

In the same way, pumping water out to sea immediately (on site) reduces the amount of water being conveyed through the wider drainage system, reducing the possibility of infiltration and recharge of groundwater (compared to if the water were to travel downstream before reaching the sea, or as is often the case in marshland, sit on the surface for some time). As already mentioned in the Relevant Representation (and above) the Board believes that improving the gravity operated Minsmere sluice, potentially with a pumped discharge capability will not only counteract any future increase in sedimentation north of the development, but also make regulating the water levels within the catchment easier thus facilitating catchment adaptation to any change (be these reductions or increases which result from the development). The Board thinks this is increasingly relevant considering the changing climate has already increased the occurrence of both flooding and multiple drought year events resulting in environmental consequences.

Finally, the Board would like to suggest that the applicant consider engaging with local stakeholders to discuss whether there would be a local appetite to turn some or all WMZ attenuation ponds into legacy multi use reservoirs. By way of example, if the high flow water resource from these assets could be transferred to farm storage reservoirs, landowners could reduce the call on their ground water abstraction licence aiding ground water recovery.

The Boards main aim is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). Further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Yvonne

Yvonne Smith
Sustainable Development Officer
Water Management Alliance



THE SIZEWELL C PROJECT: CONSULTATION ON PROPOSED CHANGES TO DCO APPLICATION, November – December 2020

Friends of the Earth continue to be deeply concerned about the widespread and chronic environmental damage that would result from such a vast commercial development as Sizewell C. The proposed changes do little, if anything, to ameliorate the impacts. Nothing can alter the fact that it would be built in a totally unsuitable place, within an Area of Outstanding Natural Beauty, across and into part of Sizewell Marshes Site of Special Scientific Interest, and adjacent to world-famous RSPB Minsmere with its designated sites of European and international importance. Planned mitigations can never make up for this outstanding coastal site, which has taken thousands of years to evolve. We therefore continue to oppose the building of this nuclear power station and all the associated buildings.

We are also concerned that the Sizewell C Co/EDF DCO application was obviously not at all ready to be submitted to the Planning Inspectorate. It is our view that the councils should never have passed it for examination. Now we are left with these extensive changes, many of which are not guaranteed to be forthcoming. This is most unsatisfactory.

Q.1 Freight management

In general, we are in favour of transport by rail rather than road, especially if the infrastructure is already in place. However, the 'green' rail route would have to be constructed to take the freight into the Sizewell C site from Leiston. This would run along the NW edge of Kenton Hills, a commuting route for rare bats, including Barbastelle, causing them great disturbance. Kenton Hills is also important for protected reptiles that would be put at risk on the railway line.

We oppose bringing more freight by sea because of damage to the marine environment (see below).

None of the proposals would reduce lorry numbers during the early years, before the necessary infrastructure is in place. These would overload our rural roads and be intolerable for residents.

Q. 2 Increased frequency of train movements

These proposals involve night-time trains, which would be increased. They would be very disturbing to people living along the East Suffolk line and into the branch line at Saxmundham. There would be an extra one during the day that could affect the passenger timetable. We do not support this, as local people have fought long and hard for an hourly rail service on the East Suffolk line.

Increasing the number of trains would cause even more disturbance to Leiston residents, listed properties and the Pro Corda music school. We have commented on this previously.

We were told during the last consultation that the negotiations with Network Rail were very problematic and that it was unlikely that agreement could be reached in time. We are now told that your new proposals are simpler and raise fewer difficulties. Will footpaths be diverted, bridges strengthened etc along the lines of past consultations? This is not clear, but you do admit that the new proposals may not be feasible. Would it not have been better to conclude your negotiations with Network Rail before submitting your application? Changes would not then have been necessary.

Q. 3 Enhancing the permanent beach landing facility (BLF)

To double the capacity of the BLF, as now proposed, would involve adding a further 30m to its length. We know from experience that any projection into the sea disturbs the coastal processes that are based on longshore drift. As the sand and shingle is trapped by the structure, increased erosion is caused further down the coast. The longer this is, the worse the effects. We cannot therefore support such plans.

Creating a landing platform on the sea bed would upset the marine ecology and could threaten the stability of the Sizewell-Dunwich offshore banks. These banks are considered to provide protection to the power stations from storms.

A road would lead from the BLF to the station platform. This would be directly adjacent to the Minsmere-Walberswick Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar. Deliveries could cause great disturbance to rare birds and other wildlife.

Q. 4 A new, temporary beach landing facility

We understand that this would be for bringing construction materials, such as aggregates, to the site. You do not explain where these very large quantities would come from, nor how they would reach the sea the other end.

We continue to be extremely concerned about so much work on the beach. Not only is this greatly valued by walkers along the Coast Path, but there are many rare plants and invertebrates here. This is a County Wildlife Site (CWS) and should be protected. Vegetated shingle supports such rarities as Sea Pea and Yellow Horned Poppy. You have promised to keep substrate and use it for replanting – but when? This could be a decade later. How long would the seeds last? Under what conditions would they be stored? You have not provided any detailed information. When Sizewell B was built, scientific work was put in place in cooperation with the University of East Anglia and special methods of dry-freezing and storage were instigated to preserve the seeds. If the beach has to be so badly damaged, then we want to see a similar scientific approach for mitigation.

Scarce butterflies such as the Grayling use this habitat for breeding and basking, as do protected adders and other reptiles. There are plans to translocate reptiles, but that is likely to overload the other habitats, leaving insufficient food to go round.

Any unavoidable use of the beach should be minimised, not expanded.

Q.5 New, temporary BLF options

All of these four options would cause significant damage, so we do not support any of them. The jetty, originally proposed in the early consultations, had to be abandoned because of the environmental problems it would cause. Piles into the sea bed cause long-term scouring at the base, so that ongoing dredging would be necessary, causing significant harm to marine biota.

The Southern North Sea is a protected area twice over: it is part of the Outer Thames Special Protection Area (SPA) for birds, especially the red-throated diver, and it is also a Special Area of Conservation (SAC) mainly for harbour porpoise. You have not convinced us that no harm would be caused to these species due to the marine works.

Q. 6 SSSI crossing

There should be no road at all over the Sizewell Marshes Site of Special Scientific Interest (SSSI) – a precious habitat supporting a great many rare and uncommon species.

You should have followed the Mitigation Hierarchy, the first stage of which is Avoidance. You have done nothing to avoid this crossing and have never presented us with other less-damaging routes for the access road.

The bridge structure is a marginal improvement on the causeway with culvert and is more likely to alleviate problems caused by flooding. The space under the bridge offers the potential for a safe animal crossing – but only if proper fencing is installed to funnel the animals through so that they won't be in danger on the road. We understand that only fencing for otters is planned, not for any of the other animals that would be at great risk on the road, including reptiles and deer, that need special fencing.

There would still be a long, dark culvert-like structure, through which all the water from the marshes would have to drain – very ecologically damaging. It would, in effect, act as a total barrier to fish and aquatic invertebrates that will not go through it, as they use polarization of light for guidance. It would become a dead zone and have a significant impact on the Minsmere-Walberswick SSSI and other designated sites to the north. This is not acceptable.

Q. 7 Fen meadow replacement

Newly created habitats have a very low success rate. Even if they are well planned and managed by conservationists, only 26%-45% are successful. Those that are developer-led, as here, do even worse, due to lack of monitoring and poor management. Fen meadow is extremely difficult, if not impossible, to recreate, as it is an ancient habitat that has taken a great many years to evolve. We know of none that has been successful in the long term.

None of the proposed sites is really close to Sizewell Marshes. Pakenham is in West Suffolk, too far away for mitigation. Altering the water levels here, as proposed, could damage the existing fen meadow.

You should not be building into fen meadow at all. This is a very rare and precious habitat. In England, most have been lost to drainage for agriculture.

The fact is that the site for the twin reactors is too small and totally inappropriate for such a massive and complex structure.

Q.8 Water resource storage area

The proposed 'wetlands during construction', is mainly to provide more marsh harrier foraging area, to help to replace that lost at Sizewell. We fail to see how this would work, bearing in mind the constant noise, lighting and disturbance. In any case, it would take some years to establish. Where would the marsh harriers feed meanwhile?

Wet woodland is an uncommon Biodiversity Action Plan habitat that, due to the SZC proposals, would go under concrete. We have been pushing for mitigation for some time. The proposals say there is 'potential' for wet woodland in the water resource area. Such a habitat takes up to 30 years to establish. Why, therefore, was it not planted at the beginning of the consultations, so that we could see if it might be successful? Mitigation guidelines from Natural England emphasise that any compensation habitats must be started well in advance of any construction works.

It is not clear whether the area would be allowed to follow natural succession, whereby the wet woodland would eventually establish itself, or whether trees should be planted. It should already be up and running. Any mitigation for wet woodland should be separate from and additional to that for marsh harriers.

Q. 9. Surface water

We are concerned that surface water run-off would increase significantly due to hard surfaces replacing marshes, grassland and woodland. This temporary outfall pipe, planned to run from the construction site to the sea to take the extra water during storms, would not be available for two years. What happens meanwhile?

The earth works to create the construction area, roads etc would cause huge amounts of silt during any downpour. All of this could wreck the delicate ecological balance of Sizewell Marshes SSSI and clog up the ditches, despite what is said in the DCO documents about best practice and SuDs drainage systems, none of which are fully effective. Many of these early works would take place before any outfall pipe is in place.

Removing surface water in this way could end up depleting the marshes, where the correct balance of water is crucial to sustain the protected habitats with their rare plants and invertebrates.

Q. 10. Other main site changes

a) Sea defence

It is well known that hard coastal defences cause flanking erosion at either end, as the energy of the waves has nowhere else to go. With climate change, this problem will increase with the rising sea and more frequent storms. This could speed up erosion at Minsmere and also at Thorpeness, both already under pressure.

It seems that the idea of the 'temporary sea defence' is to provide a clear space behind it for the major tunnelling works of the cooling infrastructure. We cannot see that it is to 'simplify its structure'. We find this misleading.

b) Construction activities & height limits

The taller the cranes and the stock piles, the worse the impact on the protected landscape of the Area of Outstanding Natural Beauty (AONB). Cranes could be up to 70m high. These and the stock-piles are likely to be in place for many years, causing a terrible eye-sore within this beautiful landscape.

c) Tree retention

You mean tree removal! We dislike the way in which you mislead the public through the use of language.

A great many hectares of woodland would go under concrete, including nearly all of Goose Hill and Coronation Wood. Trees have also been cut down in Kenton Hills woodland and at St James' Covert and elsewhere. We are opposed to loss of woodland. A further '3 to 4' trees would evidently go, but you don't say what they are. Loss of oaks, for example, or veteran trees could significantly affect the ecology of the area.

d) Boundary changes

The two village bypass: to expand the Order Limits to the west of the existing access road would mean cutting down 245sqm of Nuttery Belt woodland. This is simply to improve visibility at 60mph. We cannot support yet more loss of woodland. We are also opposed to such fast speeds, which greatly increases risk of road kill to wildlife. Wild animals and birds have not evolved to be able to assess these high speeds and react accordingly.

e) Bridleway

We wish to point out that Aldhurst Farm has been created as a wildlife reserve. How would users of the bridleway be prevented from straying over the site and causing disturbance? You do not say.

Introduction of the bridleway would reduce the biodiversity net gain being claimed. Aldhurst Farm cannot be both a wildlife reserve and a country park for local residents and visitors. Much of it is already seriously disturbed by dog walkers. There is no hope here for the safety of ground-nesting birds and protected animals such as reptiles.

Q.11. Sizewell B relocated facilities

As already stated in previous consultations, we are totally opposed to putting the training centre and visitor centre at Sizewell, both of which take up a considerable amount of land. We believe they should be in Leiston, where there is a very large redundant school building with extensive grounds. This is by far the best way to free up land so that Coronation Wood could have been saved.

There are problems with both options.

Some years ago we attended a workshop on Sizewell A land and the conclusion was that it should be restored to a green recreational area for local people and visitors, especially bearing in mind its location within the AONB and Suffolk Heritage Coast.

There should be no car park on Pillbox Field nor more land take from the SSSI for a footpath, as previously stated.

We are also opposed to the planting of trees on Pillbox Field. This is rough acid grassland – a habitat now sorely missing from Suffolk. This provides important shelter for insects that feed birds and bats. Small mammals thrive here that are food for the owls hunting over it. Any mitigation planting should be elsewhere, preferably on low-grade agricultural land.

Q.12. Associated development changes

a) Reduction in land required

We are in favour of any reduction in land take.

b) Boundary changes

Changing boundaries at such a late stage is causing considerable extra stress to local people involved.

As regards the public rights of way around Walk Barn, walkers generally alter the footpath route spontaneously for good reason. We would need to know what this is to be able to comment.

c) Southern Park & Ride

Residents of Wickham Market do not want this P & R so close to their village. It already suffers from a very narrow main street and parking problems and they fear it will be used as a rat-run by Sizewell workers. This will increase noise and traffic fumes significantly and greatly reduce their quality of life for more than a decade. None of the traffic solutions provided is acceptable. The landscaping proposed will make little difference to the overall negative impact.

The A12 bypass around Wickham Market was constructed in order to leave this village free of through traffic. Sizewell traffic should not be allowed through the village at all.

*Rachel Fulcher, MPhil, Coordinator,
on behalf of Suffolk Coastal Friends of the Earth
Registration ID:20025904
16/12/2020*

Suffolk County Council's response to SZC Co.'s Consultation on Proposed Changes

17 December 2020

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GLOSSARY OF ACRONYMS

AIL	<i>Abnormal Indivisible Loads</i>
AOD	<i>Above Ordnance Datum</i>
AONB	<i>Suffolk Coast and Heaths Area of Outstanding Natural Beauty</i>
BLF	<i>Beach Landing Facility</i>
CWS	<i>County Wildlife Site</i>
DCO	<i>Development Consent Order (referring to the application documents submitted by SZC Co. to the Planning Inspectorate)</i>
HCDF	<i>Hard Coastal Defence Feature</i>
HGV	<i>Heavy Goods Vehicle</i>
LEEIE	<i>Land East of Eastlands Industrial Estate</i>
LOAEL	<i>Lowest observed adverse effect level (related to noise)</i>
M&MP	<i>Monitoring and Mitigation Plan (related to coastal change)</i>
oLEMP	<i>outline Landscape and Ecology Management Plan</i>
SCDF	<i>Soft Coastal Defence Feature</i>
SOAEL	<i>Significant observed adverse effect level (related to noise)</i>
SSSI	<i>Site of Special Scientific Interest</i>
SZC Co.	<i>The applicant</i>
WMZ	<i>Water Management Zone</i>

"The Council" refers to Suffolk County Council and "the Councils" refers to Suffolk County Council and East Suffolk Council, together.

"The Consultation Document" refers to the SZC Co.'s Consultation on Proposed Changes, November 2020.

EXECUTIVE SUMMARY

- I. Suffolk County Council (the Council) welcomes this consultation on proposed changes, as a number of the changes aim to address key concerns that the Council raised in its [Relevant Representation](#).
- II. Whilst these proposed positive changes are appreciated, the Council is disappointed that SZC Co. has not used this opportunity to consult on other changes to address further concerns raised by the Council in its [Relevant Representation](#), including removing pylons from the proposals, removing the outage car park from Goose Hill, and providing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction.
- III. The Council strongly supports the principle of proposals to increase the use of rail and marine freight deliveries to reduce HGV movements. However, the consultation provides inadequate information on the deliverability of the proposals and their adverse consequences. In particular, assessments and suitable mitigation proposals for noise and vibration impacts of night time trains on the East Suffolk Line have not yet been provided, and the environmental impact assessments of the different Beach Landing Facility (BLF) options are not advanced enough to conclude whether the proposals may result in unacceptable impacts. Further detail is also required to show that the necessary infrastructure can be delivered in the timescales required, as any delays in the

rail and marine facilities would require more freight to be moved by road which would cause disruption to the existing highway for both construction traffic and local users. As such, the Council cannot at this stage make an informed overall judgment on the proposals. The Council would welcome further dialogue with SZC Co. to better understand the evidence base which has led to the current proposals. The Council is committed to continuing to work with SZC Co. with an aim to overcome challenges and find suitable mitigation measures to enable an increase of sea and rail deliveries, as these proposals would go some way towards addressing the Council's concerns about the transport strategy raised in its [Relevant Representation](#).

- IV. The Council considers the proposed change to the design of the Site of Special Scientific Interest (SSSI) crossing is preferable to that in the DCO proposals. This results in some improvement to ecological connectivity, although further ecological improvements of that design should be considered, as outlined in this response. However, the Council maintains its position that the ecological impact of the crossing can, and should, be further reduced by replacing the proposed design with a three-span bridge design.
- V. Whilst accepting that the crest height of the Hard Coastal Defence Feature (HCDF) must be set at a level that provides appropriate flood protection and resilience to the power station, the Council cannot accept the proposed indicative designs of the HCDF and its increased seaward movement, as the proposals significantly lack detail and assessment at this stage.
- VI. The Council notes a number of positive changes which are tentatively welcomed, although it reserves final judgement on the suitability of the proposals until more detail and substance is provided. The proposed changes, which are welcomed in principle, include:
 - a. Removal of the relocated Sizewell B outage car park from Pillbox Field;
 - b. Provision of an additional fen meadow compensation area at Pakenham;
 - c. Change of location of the water storage area away from the northern edge (Minsmere boundary) and its replacement with a flood mitigation area;
 - d. Provision of the new bridleway link between Aldhurst Farm and Kenton Hills; and
 - e. Extension of the north west bund of the southern Park and Ride site.
- VII. Further detailed comments are made on other proposed changes.

A. PREAMBLE

1. Suffolk County Council welcomes this consultation on proposed changes, as a number of the changes aim to address key concerns that the Council raised in its [Relevant Representation](#), most notably proposals that seek to increase rail and sea material deliveries and reduce the number of HGV movements, changes to the design of the SSSI crossing, and an additional fen meadow compensation site.
2. Whilst these proposed positive changes are acknowledged, the Council is disappointed that SZC Co. has not used this opportunity to consult on further changes to address the other concerns raised in the Council's [Relevant Representation](#). The Council continues to argue that these issues need to be addressed, either by further changes to the application, or, where this is appropriate, through Section 106 obligations or changes to the DCO requirements. These issues include:
 - a. Removing the proposed pylons for electricity export connection on the main development site, by utilising alternative means to connect to the grid;
 - b. Removing the outage car park for Sizewell C from its proposed location within the Suffolk Coast and Heaths Area of Natural Beauty (AONB);
 - c. Designing the Sizewell Link Road as a temporary road to be removed after Sizewell C construction;
 - d. Improving ecological connectivity to Aldhurst Farm;
 - e. Acceptable proposals for potable water supply;
 - f. Acceptable realignment of the coastal footpath, as well as a safe and suitable diversion route during its closure for the construction of the development and for the operation of the BLF (noting that it appears that, as a result of the proposed changes, the frequency of beach closures is likely to be reduced compared to the proposals from the DCO application);
 - g. An acceptable solution to mitigate the impact on the Leiston Household Waste Recycling Centre at Lovers Lane;
 - h. Additional highway improvements required to ensure continued sustainable and safe movement of people and materials and improving road capacity;
 - i. Provision for the cost of full removal of the hard sea defence as part of the decommissioning process unless and until a future study showed this to be unnecessary or undesirable; and
 - j. A comprehensive coastal change Monitoring and Mitigation Plan (M&MP), with an allocated mitigation/compensation budget, that allows determining if and to what extent an observed coastal change in the Sizewell C zone of influence is attributable to the development, and appropriate and required mitigation measures.
3. The feedback provided in this response should be read in parallel with comments provided in the Council's [Relevant Representation](#). The Council recognises that, in some instances, the new proposals may either alter or make redundant previous feedback, however in general previous feedback remains valid.
4. Several of the changes proposed may result in the need to allow additional parties to register as Interested Parties with the Planning Inspectorate.

5. We note that, in its introduction (paragraph 1.1.6), the Consultation Document refers to the opportunity “to establish an independent environmental Trust to manage the ongoing re-wilding and biodiversity of the growing Sizewell Estate (...), with a view to expand and connect parcels of land identified for re-wilding and habitat creation”. The Council is very interested in such a proposal and would like to find out more detail, as so far the information about this idea is still very vague. Careful consideration would have to be given to any relationship between such a Trust and required mitigation and compensation for the Sizewell C development secured under Section 106.
6. The response has separate headings on the most important changes, related to the freight strategy, the beach landing facilities, the SSSI crossing proposals and the changes to the HCDF. Any other changes from the consultation are covered under the subsequent Main Development Site and Associated Development Site headings.

B. FREIGHT STRATEGY

7. Paragraph 5 of the Council's [Relevant Representation](#) states:

“The Council does not support the applicant’s proposed freight transport strategy as it stands, due to the fact that (1) it is not a sustainable strategy, because an increased proportion of rail transport (and potentially sea-borne transport) could be reasonably achievable, and (2) it does not currently mitigate its transport impacts on the highway network to acceptable levels for the community. The Council asks the Examining Authority to consider the proposals against national policies promoting sustainable transport solutions. The Council is not content that the Sizewell C proposals have not replicated the much greater use of sea transport which occurred at Hinkley Point C and is proposed for Bradwell B. Given the minimal use of sea transport, the Council is particularly disappointed that opportunities have not been taken up by the applicant to pursue an upgrade of the East Suffolk Line which would allow for a greater percentage of materials to be delivered to site by rail. The Council considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries at this point. “

8. Therefore, the Council welcomes the reconsideration of the freight strategy by SZC Co. and strongly supports the principle of proposals to increase the use of rail and marine freight deliveries to reduce HGV movements.
9. The Consultation Document leaves a number of key issues unresolved. In addition, it re-emphasises the need for mitigation of harm that was not dealt with in the draft DCO. Further assurance is required about the deliverability, impact and mitigations of any submitted changes to the transport strategy.
10. The Consultation Document suggests (in table 3.1) that the new proposals may result in “the optimum integrated freight management option”. The Council is in support of finding the most sustainable freight management solution but wishes to note that these proposals should have been considered and put forward in the pre-examination phase and at DCO submission. The reliance on and importance of rail that is being discussed now should have advised the proposals at an earlier stage where it might have been able to allow for the adoption of the “rail-led” strategy proposed at Stages 2-4 of consultations, which would have provided for day-time

rail freight deliveries. An earlier consideration of alternative marine transport solutions, following the conclusion that a jetty was not considered deliverable after the Stage 2 consultation, would have allowed for a comprehensive assessment of optimal solutions and their impacts to be available now. Notwithstanding this, the Council is very supportive for the changes proposed at this stage to be further pursued, assessed and, wherever possible, implemented.

11. If SZC Co. can deliver an additional Beach Landing Facility (BLF) and an enhanced capacity of the permanent BLF, the Council wishes to see the marine deliveries be maximised and prioritised over train and HGV deliveries. It would be strongly welcomed if, as a result of the BLFs, HGV and Abnormal Indivisible Loads (AIL) movements can be even further reduced, and (as secondary priority) night-time rail movements can be reduced.

Outstanding questions about the freight strategy.

12. The following queries arise from the Consultation Document in respect of the freight strategy. The Council wishes to see greater clarity on these matters:

- a. The Council needs to be assured that the most sustainable approach of sourcing and transporting materials to site will be used wherever possible and that disruption of haul routes is kept to a minimum. Detailed questions about apparent inconsistencies in the Consultation Document were set out in a letter from the Councils to SZC Co. on 30 November 2020 (included in the Appendix to this response). In particular, there appears to be a difference between the opportunities for additional capacity afforded by increased rail and/or marine options and the decrease of HGV movements. A clearer understanding is required of
 - the relationship between the figures for the overall amount and types of materials to be transported to the site;
 - the likely origins of materials;
 - the timings of the demand for different materials across the life of the project and the capacity of the different transport modes to meet these requirements; as well as
 - the delivery timetable for the associated works such as the green rail route, BLF and relief roads so that these are available when required by the freight strategy.
- b. Consideration by SZC Co. as to whether using the capacity of the BLFs in the early years may provide an opportunity for delivering improvements to the East Suffolk Line (as proposed in previous consultations under the "rail-led strategy") without jeopardising the main project's construction programme. If such improvements were still deliverable, this could permit freight trains to be brought to the site by day rather than by night, without much of the latter's attendant noise issues and possibly allowing an increase in the achievable number of rail movements per day.
- c. In addition to the possible increase in the number of trains, the Council requests that SZC Co. assesses the opportunities to improve the capacity of rail haulage by increasing the length and payload of trains, as well as running trains on six nights a week rather than five (though the consequent impacts

on blocking of level crossings with the former and extended night-time disturbance with the latter would need to be considered). If trains were run on six nights a week, the Council's preference would be for trains to run between Sunday evenings and Saturday mornings (i.e., not running trains on the nights from Saturday to Sunday).

- d. Paragraph 3.2.8 of the Consultation Document suggests that there might be continued use of the rail facilities at the Land East of Eastlands Industrial Estate (LEEIE) after the opening of the Green Rail Route in the event of a four- (or five-) train operation. Clarification is required whether the use would continue to be restricted as proposed during the early years (i.e., no movements through Leiston or unloading overnight), and if prolonging use of the LEEIE as a transport hub increases traffic on Lovers Lane in peak years.
- e. There is reference to the possible use of a fifth train per day during peak construction. The Council would have concerns if this significantly disrupted passenger services, particularly at peak travel times, and would welcome further discussions on this.
- f. The changes to the freight management strategy will affect the Environmental Statement and the controls within the relevant management strategies. This needs to be better understood, including whether the HGV reductions will be reflected in these documents.
- g. The Consultation Document refers (Table 3.5) to the impacts of additional rail movements on level crossings. Confirmation is sought on this, including whether this includes the East Suffolk Line as well as the Leiston Branch Line.
- h. Confirmation is required on the deliverability of running the proposed additional trains (as well as the trains as set out in the draft DCO) in the wider rail network.

Environmental consequences of the freight strategy

- 13. The Council has always pressed the developer to look for transport solutions that reduce HGV road traffic. Any reduction in HGV movements will have environmental benefits in reductions of the impact on amenity, noise, vibration, air quality and fear and intimidation created by the number of HGVs along the A12 and B1122. Less HGVs is also likely to lead to a reduction in climate change emissions. A reduction of HGV movements is expected to reduce the perception of traffic volumes which may lead to fewer vehicles diverting to local roads. As such, the Council strongly supports the principle of the proposed changes and is committed to working with SZC Co. to overcome any challenges and find suitable mitigation measures to make these changes happen.
- 14. While any reduction of HGVs will reduce noise and vibration impacts along road corridors, to achieve a perceptible noise and vibration impact by comparison with the DCO application proposals, a significant diversion of loads to both marine and rail is needed.
- 15. Whilst welcoming the benefits arising from fewer HGVs, the environmental costs created by the increased use of alternative modes need to be carefully considered and mitigated.

16. On greater utilisation of BLFs, it is not possible to make a judgement as to the environmental impacts when so many factors remain to be determined (see details in the section below).
17. For rail, the principal impact would be the noise and vibration disturbance of two additional night-time train movements along the East Suffolk Line (one additional train to site and back), which would be in addition to the five night-time and one day-time train movements already proposed in the draft DCO (plus a possible fifth day-time return train journey). These additional trains would exacerbate existing issues by extending the hours when such disturbance would take place. Accordingly, it is important to effectively deal with the impacts of those services already identified in the DCO application as well as any additional train services. Further assessment of the environmental impacts of night-time train movements (both for the draft DCO proposals and the additional train movements proposed in the Consultation Document) is required, particularly on noise and vibration, but also on the wider environmental and ecological impact.
18. Appendix 1 of the Consultation Document refers to the DCO Environmental Statement, identifying properties which are subject to significant observed adverse effect level (SOAEL) in respect of noise and vibration from rail use. It then goes on to propose a Noise Mitigation Scheme that deals with properties expected to be subject to noise levels over SOAEL. This is an inadequate response to the issue and is not policy compliant. Both National Policy Statement EN-1 and the Noise Policy Statement for England state that there should be steps taken to mitigate and minimise adverse effects of health and quality of life where the impact lies between SOAEL and the lowest observed adverse effect level (LOAEL) and there is no indication that the SZC Noise Mitigation Scheme is proposing to do this. The Council expects mitigation to be provided on both any breach of SOAEL and any breach of LOAEL to ensure that internal noise levels do not cause adverse effects to residents. Mitigation needs to be based on modelling and prediction and actual monitoring.

C. BEACH LANDING FACILITIES (BLF)

19. As outlined above, the Council welcomes that SZC Co. proposes in its Consultation Document options to increase marine freight deliveries to site, which is something the Council has asked to be investigated for many years. Whilst it would have been preferable if these proposals had already been explored and put forward in the pre-examination phase, the Council is committed to working with SZC Co. to aim to overcome any challenges arising.
20. The proposals in the Consultation Document are not sufficiently developed, and the impacts, particularly on coastal processes, have not been fully evaluated. The Council needs to be convinced that any proposal is deliverable and will not have unacceptable coastal impacts. The Council is working closely with the technical experts from Coastal Partnership East and East Suffolk Council to assess the proposals.
21. The Consultation Document proposes both to enhance the design of the permanent BLF proposed in the DCO to receive more regular deliveries, and to provide an additional temporary BLF. As both proposals would reduce transport by road, each is welcome in principle. The Council understands that the proposals for enhancing the permanent BLF will increase the number of AILs to be delivered by

sea from 50 per annum to 100 per annum in the construction phase, which will reduce ALLs delivered by road. This would be welcome considering that ALLs can cause significant disruption to traffic flows.

Outstanding questions about the BLFs (in addition to the coastal processes comments below)

22. It is not clear how the capacity of the different temporary BLFs relates to the indicated reduction of HGVs. It is stated that options 1 and 2 for the BLF would equate to a reduction of 25 HGVs (50 movements) and Options 3 and 4 would result in reductions of 50 HGVs (100 Movements). However, these figures do not directly compare with the tonnes of material set out at Table 3.6 (and what has previously been stated about one HGV equating to 18.5 tonnes), which indicate Options 1 and 2 could deliver as much as 40 HGVs (80 movements) daily and Options 3 and 4 would be considerably more than this given they have seven times the capacity.
23. The Consultation Document refers to delivery “campaign” periods for both BLFs to be between approximately 1 April and 31 October. Whilst it is understood that the proposed changes to provide for additional stockpiling would allow for material deliveries to be front loaded in each season, the Council is seeking additional clarification of how far these campaign periods may result in seasonal variations in HGV deliveries and whether the same restrictions to daily and quarterly HGV movements would apply all year around given these limitations.
24. Confirmation is required as to whether any additional facilities will be required and what impact these would have if marine deliveries are increased e.g. regarding bunkering, provisioning, or customs/ port health inspection cargo superintendents.

Impacts of the new BLF proposals on coastal processes

25. Our assessment of the proposals is limited because further information is required to adequately understand the proposed works and their potential impacts, and how this differs from the information presented in the DCO. The comments in this section, and in the section on the changes to the sea defence structures, must therefore be regarded as a preliminary view conditional upon the supply, and the Councils’ review, of additional material by SZC Co.
26. The feedback provided in this response should be read in parallel with feedback given in the Council’s [Relevant Representation](#). We recognise that the new works information may either alter or make redundant previous feedback; however, any previous feedback should not be overlooked or automatically regarded as superseded.
27. The Council is disappointed that it has not received responses to questions and points of clarification from the [Relevant Representation](#) and raised at subsequent meetings with SZC Co., and that the new change proposals have not clarified or answered those concerns. The Councils now have additional questions. This makes it more challenging for the Councils to reach common ground with SZC Co. on these matters in the desired timescales.
28. It should be noted that a robust Monitoring and Mitigation Plan (M&MP), that is fully funded by the developer/site operator, is a critical requirement in the delivery of satisfactory outcomes on coastal processes. We recommend that this document be placed in the public domain as soon as possible.

29. For any BLF solution, the Council's preference is to minimise the use of additional permanent embedded piles, to maximise the use of fully removable equipment and avoid the need for dredging of the outer sand bar, as far as feasible.
30. The proposals for both permanent and temporary BLFs could result in new impacts/increased risks arising from dredging of the outer sand bar, for navigation access, and sediment movement blocking by the berthing platform. These require further investigation and modelling to confirm and quantify. The possibility of the use of a backhoe dredger is of concern as it has potential to lead to a loss of material from the nearshore system; the use of a plough dredger appears preferable.
31. The changes have potential to cause additional negative impacts that may be temporary and potentially manageable via the M&MP process, but this needs to be demonstrated by SZC Co. in respect of detailed further studies and modelling.
32. Further detailed investigation and impact assessment of this design, alongside an agreed M&MP that deals with identified risks, is required for the Council to be able to come to a more fully informed view on the proposals.
33. Based on the considerations above, our initial preferences are:
 - a. **For the permanent BLF:** The Council prefers a berthing platform that does not include piles. We note that discussions during this consultation period have suggested the berthing platform (or grillage) design may exclude piles, which would be welcome.
 - b. **For the temporary BLF:** Based on the incomplete information provided in the Consultation Document, the Council's preference is Option 4, as the option with the highest freight delivery capacity.

Option 4, as presented in the Consultation Document, also appears to be favourable in its potential use of Self Elevating Platforms and a berthing platform design that does not include piles. However, we would need to see full details of the proposed works and the associated environmental impact assessment.

Consideration of other impacts of the BLF proposals

34. Coast path: The Council welcomes the indication (in paragraph 3.3.14 of the Consultation Document) that in enhancing the permanent BLF, the coast path would only need to be closed in 'rare circumstances', which is a reduction from the proposals in the draft DCO application. Closures for the temporary BLF are also indicated to occur only during 'rare circumstances' (paragraph 3.3.40). Further information is sought on the envisaged frequency of closures and the communication to the local community of these closures, and on the impact of the temporary BLF on the amenity and experience of users of coastal access.
35. Landscape: Whilst an additional BLF will have an adverse effect on the coastal character of the beach area and near shore coastal waters in the immediate locality of Sizewell Beach, the Council's initial views is that this is unlikely to be of significance in relation to the overall impact of the construction phase, beyond the visual envelope of the beach area. However, to finalise the Council's views on this matter, it requires an updated LVIA and an assessment of the impacts on the character and special qualities of the AONB, as well as further detail in respect of

lighting requirements for operation in the dark, navigating lighting requirements, and the scale of the vessels involved.

36. Ecology: The Council agrees that a proposed temporary BLF would have little additional terrestrial ecological impact, as the Suffolk Shingle Beaches County Wildlife Site in front of the platform will already have been removed as part of the construction of the Hard Coastal Defence Feature (HCDF). The Consultation Document recognises that, for marine ecology and designated sites impacts, the further assessment is required for both the temporary and permanent BLF. In the absence of this information, it is not possible to determine which of the proposed options is the least ecologically damaging. For any piling activities, it is likely that a seasonal restriction will be required to protect nesting little terns.
37. Environmental protection: Environmental impacts in terms of noise, vibration, light, and dust will need to be considered and the mitigation of those impacts addressed for whichever option is chosen. For the temporary BLF, a conveyor belt is proposed between the beach and stockpile locations. The Council requests that the conveyor belts should be covered to reduce dust and particulate impacts.

D. CONCLUSION ON PROPOSED CHANGES TO THE FREIGHT STRATEGY

38. The Consultation Document suggests that there is an opportunity to substitute some of the proposed HGV movements with additional use of rail and marine. This reduction in HGVs is to be welcomed for many important environmental reasons. It is apparent that these improvements will need to be balanced against any adverse consequences created by the increases in night-time rail use and provision of additional BLFs, and mitigation needs to be provided for these impacts. Inadequate information has been provided within the Consultation Document as to the deliverability and impacts of the proposals, and the Council would welcome further dialogue with SZC Co. to better understand the evidence base which has led to the current proposals.
39. Whilst strongly in favour of the principle of the proposed changes, the Council wishes to continue to work with SZC Co. to seek to understand these consequences and resulting mitigation requirements further, which will need to be made clear in any formal submission to the Planning Inspectorate.
40. In terms of rail use, the Council considers that the most effective approach remains the implementation of the original proposals of the "rail-led strategy" included in earlier consultations with appropriate improvements being made to the East Suffolk Line as well as the Sizewell branch line.
41. The Council strongly supports the principle of increased delivery of materials and AILs by sea, and therefore welcomes the proposals for the BLFs. It is important to note that the impact assessments of the different BLF options are not advanced enough to conclude whether the proposals may result in unacceptable impacts. From the information available, the proposals to enhance the capacity of the permanent BLF appear acceptable. For the temporary BLF, the Council's initial preference is for Option 4, with its highest freight delivery capacity and its apparent preferable design in terms of coastal process impacts. These conclusions are strongly caveated as further assessments particularly on coastal processes and, also, on ecological and environmental impacts, are required to take an informed judgment.

42. To ensure that SZC Co. and its contractors retain a more sustainable split between the different modes of freight transport, robust measures should be in place through the DCO and its supporting documents that cap the number of HGVs coming to the site.
43. The Council is committed to working with SZC Co. to increase deliveries by rail and sea, as these proposals would go some way towards addressing the Council's concerns about the transport strategy raised in its [Relevant Representation](#). In the Council's view, it will be imperative for SZC Co. to implement solutions that significantly reduce HGV numbers from those stated in the DCO application.

E. SIZEWELL MARSHES SSSI CROSSING

44. Paragraph 70 of the Council's [Relevant Representation](#) notes the Council's serious concern about SZC Co.'s proposals for a causeway to cross the Sizewell Marshes SSSI and the resulting ecological impacts:

"A causeway design would have a much higher ecological impact than the alternative of a three-span bridge across the Sizewell Marshes SSSI (as was proposed as one option during the pre-submission consultations), as the causeway would involve a greater amount of direct land-take from the SSSI than a bridge option and would sever connectivity for species moving between Sizewell Marshes SSSI and Minsmere (particularly species such as water vole, birds and invertebrates, and including European Protected Species)."

45. The Council considers that the proposed change to the SSSI crossing put forward in the Consultation Document to a 30m bridge with embankments is an improvement to the proposals set out in the draft DCO. The Council agrees that there would be some ecological improvement as a result of the change, particularly in terms of somewhat improved connectivity for bats, water vole and otter, and the slight reduction in SSSI land take (although there will still be temporary land take/damage to the parts of the SSSI which will not be permanently lost). SZC Co. still needs to provide evidence that species such as riparian mammals would use such a feature to pass from habitat to habitat. However, the Council understands that, as currently proposed, the crossing design would still impede the passage of a number of invertebrate species, therefore conflicting with the requirements of the Water Framework Directive, as the status of the relevant waterbodies would be adversely affected.
46. The Council considers that the newly proposed option remains sub-optimal from an ecological perspective and is worse than a 'full three-span bridge' option, particularly in relation to permanent SSSI area loss and habitat connectivity for invertebrates. The Council maintains its position that the ecological impact of the crossing can and should be further reduced by replacing this design by a full three-span bridge design.
47. As the change proposed is an ecological improvement to the proposals assessed in the DCO Environmental Statement, the terrestrial ecology and ornithology assessment rationale set out in Table 4.4 is accepted.
48. The Consultation Document refers to the overall height of the crossing currently being proposed at 7.3m AOD with a potential need to increase the height to 10.2m AOD at some point in the future if the risk of flooding requires this modification. Consideration should be given as to whether there is scope to directly design and

construct the crossing at the increased height of 10.2m AOD. This could allow an increase of the height of the bridge under the causeway, facilitating the passage along the watercourse underneath the crossing for a greater range of invertebrate species. Increasing the height now would also avoid the need for future disturbance to vegetation and landscaping on the embankment and the damage this could cause to biodiversity utilising the area. For such a change, a full landscape and visual impact assessment and ecological appraisal would be required.

49. The Council requests greater clarity about the rationale for the retention of the formation for the second carriageway and supporting structures of the crossing beyond the construction period. The removal of the second carriageway formation after the construction phase could facilitate more effective ecological connectivity in the long term, and improve the passage of, for example, invertebrates (see paragraph 45 above), and should therefore be fully explored, although the Council recognises that this would result in additional disturbance to vegetation and landscaping on the embankment. If such alternatives are proven not to be deliverable, the Council requests that further modifications to the design are developed, to better maintain the ecological function of the habitats on either side of the SSSI crossing.
50. Beyond the ecological comments above, there are no specific concerns about the proposed change. From a landscape perspective, the change proposed is acceptable. As stated before, in terms of archaeology, assessment and mitigation will need to be factored in as this area has a potential for buried surface archaeological deposits, including wet-zone activity, waterlogged remains, as well as palaeo-environmental remains. The area has yet to be subject to archaeological investigation. For surface archaeology, trial trenched evaluation and palaeo-environmental assessment will be required (post consent), subject to an agreed Written Scheme for Investigation and followed by mitigation as appropriate. For deeper deposits, assessment required in line with the peat strategy. Further mitigation to be decided pending results of evaluation. Historic Environment is not included in table 4.4 but should be considered as per comments above.

Conclusions on the SSSI crossing

51. The proposed change of the design of the SSSI crossing results in improved ecological connectivity and a slight reduction of SSSI land-take and is therefore preferable to the draft DCO proposals, although even with this design, further improvements should be explored. However, the ecological impact of the SSSI crossing can and should be further reduced by replacing this short bridge with a full three-span bridge design.

F. CHANGES TO THE HARD COASTAL DEFENCE FEATURE (HCDF)

52. It is accepted that the crest height of the HCDF must be set at a level that provides appropriate flood protection and resilience to the power station. The amount of change proposed (from 10.2m AOD to 14m AOD), which we note is due to new climate change information, is surprising.
53. It appears that the increase in crest height and the relocation of Marine Shafts to outside the cut-off walls has led / contributed to a significant seaward movement of the HCDF profile of around 8m (to be confirmed by SZC Co.) compared to the draft DCO proposals. We require confirmation if and by how much the relocation

of Marine Shafts has moved the HCDF seaward, and if so, justification of the temporary construction-related benefits of this action against the long-term negative impacts of a more seaward HCDF.

54. The Council requires more detailed information on the nature and extent of changes in the HCDF profile, including how the more seaward position will affect planned mitigation actions, notably the Soft Coastal Defence Feature (SCDF) design and management and the post-SCDF phase of beach management.
55. The adaptive profile appears to move the rock slope much further seaward. It is disappointing that no information is included as to under what environmental conditions the adaptive profile would be built. We expect to see more detail of the profile design at this stage of development to enable us to assess the proposals.
56. At the southern extent of the Sizewell C frontage, the temporary defence line makes a 90 degree return landward. Confirmation is sought as to whether this a proposed change to the DCO application design which featured a tapered transition between Sizewell C's HCDF and the existing Sizewell B defence. If so, a justification for the change and an assessment of the new impacts should be provided.
57. Due to this absence of data, a meaningful assessment of linked environmental impacts has not been provided, and could not be undertaken, by SZC Co. This is reflected in the lack of information on coastal change impacts in the Consultation Document. It is therefore not possible for the Council to make an informed assessment and fully comment about the proposals.
58. The Council's view is that the apparent significant seaward movement of the defence will lead to an earlier, and, over the lifetime of the site, a much greater negative impact on natural shoreline change.
59. Concerns were raised in the Council's [Relevant Representation](#) about the potential impact of the defence position relative to the shoreline. This new information significantly increases these concerns - not least as SZC Co. has not yet indicated the extent and timing of the interception by the HCDF on the active shoreline, including both the SCDF and the natural beach.
60. The Council requires assessment of the proposal as an integrated package; as such we cannot accept the proposed 'indicative' designs of the HCDF because of the apparent significant seaward movement of the HCDF and the uncertain impacts on coastal processes caused by it. Further work is required by SZC Co. to produce clearer and more developed HCDF design information, allowing for the possibility of an increase of the crest height without an associated significant seaward movement.
61. It is noted that the changes proposed to the HCDF may mean that the soft materials covering it are lost/need recharging earlier in the life of the station. As a result, the long term impacts (and potentially eventual loss) on this part of the Suffolk Shingle Beaches County Wildlife Site (CWS) could be accelerated, possibly resulting in a worse long term impact than that assessed in the Environmental Statement.
62. From a landscape perspective, there are no specific concerns provided the HCDF will not be exposed, and subject to a well-considered surface restoration programme in line with what has been discussed throughout.

Conclusions on the proposed changes of the Hard Coastal Defence Features

63. SZC Co. should prepare a developed HCDF proposal that addresses the concerns described above together with further detailed investigation and impact assessments. More information is also required on its plan location and profile relative to the proposed permanent HCDF (with comparison of that presented in the draft DCO), the permanent and temporary BLFs and other features, including mean high water springs (MHWS), to give context. As part of this process, options should be prepared and presented for review by consultees that:
- a. Avoid a significant seaward movement as part of the transition to an Adaptive profile;
 - b. Ensure that the initial toe detail / level is appropriate in the context of the site life and potential shoreline retreat / beach level drop; and
 - c. Include the use of engineered structures, for example wave return walls, in both initial and adaptive profiles whilst managing the proposed landscaping measures by which the infilling of the rock armour with a soil for planting could impair the hydraulic properties of the structure.
64. SZC Co. must demonstrate that the M&MP includes appropriate coverage of any changes to forecast impacts and mitigation measures.

G. OTHER CHANGES PROPOSED FOR THE MAIN DEVELOPMENT SITE

Definition of the main development site

65. Detailed confirmation is sought on what powers will be used for the delivery of level crossing works associated with the Green Rail Route and which bodies will be responsible for signing-off the proposals. The Council assumes that the main development site definition by SZC Co. includes the Green Rail Route as well as the proposed highway works on Lover's Lane and Abbey Hill – these items are within the red line but are not included in the list in paragraph 2.3.3 of the Consultation Document.

Relocated Sizewell B facilities / Pillbox Field

66. The Council welcomes the proposal to remove the outage car park from Pillbox Field and move it to the existing Sizewell B west car park as part of the relocated facilities proposals (Option 1 in the Consultation Document), with its resulting reduction in landscape and ecological impacts and reduced additional development within the AONB. Whilst both Option 1 and Option 2 propose a reduction in building heights which is supported, Option 2 of the Consultation Document does not provide other significant improvements.
67. Further detail on Option 1 needs to be provided:
- a. Confirmation that there will be no intensification in the use of the site entrance to Sizewell B compared to the current usage during Sizewell B outages;
 - b. The provision of a safe crossing point for users of Bridleway 19 on Sizewell Gap to mitigate the increase in use during construction of Sizewell C and the Sizewell B relocation; and

- c. An archaeological management plan is required, outlining how remains are to be preserved in situ both prior to, during and after construction and including during proposed landscaping works on this field. Should plans revert to locating the car park over the area of known archaeology, excavation will be required.
68. Both Options 1 and 2 could, and should, be improved if some of the oak trees on the existing boundary of Coronation Wood could be retained. It must be emphasised that any trees that do not need to be removed must be retained with appropriate protection from vehicle movements and other activity. Replacement planting at a 10 to 1 ratio is welcomed and details have recently been agreed with East Suffolk Council in respect of the 2019 Town and Country Planning Act (TCPA) consent for the Sizewell B Relocated Facilities application.
69. It is noted that Coronation Wood has now had an archaeological earthwork survey but still requires trenched evaluation, followed by mitigation as appropriate.

Temporary Water Storage Area

70. The proposed change of moving the water storage area away from the northern edge of the main development site (Minsmere boundary) and its replacement with a flood mitigation area is tentatively welcomed as a likely improvement in terms of landscape impacts and ecological mitigation measures compared to the DCO proposals, subject to:
- a. Final profiling details. As a very sensitive area in landscape terms, over engineered land profiling will need to be avoided, and the final details given careful consideration;
 - b. Confirmation that the creation of the wetland area is not going to have any adverse impact on either the adjacent Minsmere South Levels (part of the Minsmere-Walberswick Heaths and Marshes SSSI) or the adjacent woodland (The Grove). In particular, any potential hydrological impacts on the Minsmere South Levels need to be assessed (this is not picked up in Table 4.3);
 - c. Arrangements being in place for monitoring water quality; and
 - d. More details on the design and construction methodology for the proposed wetland area.
 - e. Archaeological mitigation areas being confirmed prior to site preparation works and any landscaping or planting, noting that archaeological evaluation has defined extensive and sensitive archaeological remains.
71. In terms of water management, clarification is required as to whether Water Management Zone (WMZ) 5 is being reduced in size to account for the new location of the temporary water storage area, alongside justification for the sizing of any WMZs. The Council notes that both the water resource storage area and WMZ 5 have shrunk in capacity as a result of the proposed changes; this may facilitate a reduction in flood risk to offsite land and property, but there needs to be an assessment and balancing of all impacts.
72. It is not clear whether the water storage area is proposed as a temporary facility or, as what would be favoured in principle f by the Council, left in place as a legacy benefit to local farming activity, although this option would require further discussions with local stakeholders.

Landscape Retention and Removal

73. As the changes involve only minor additional tree removal, the Council has no significant concerns on this matter. It should be noted that the isolation of habitats needs to be addressed in post-construction mitigation and management

Surface Water Discharge Across Sizewell Beach

74. The Council does not have significant concern about the proposed construction of a storm surface water discharge as a temporary measure until the permanent Combined Drainage Outfall (CDO) is constructed.
75. The Council as the Lead Local Flood Authority (LLFA) does not have concerns over the principle of this outfall, but it will be necessary to control the area that it serves and the rainfall events for which it operates, detail of which is yet to come forward. This will have an impact on the extent of all WMZs across the main development site.
76. The LLFA notes its concerns around the deliverability of the proposed WMZs (in particular WMZ 1) prior to construction of the CDO. We have concerns that this may result in the temporary outfall being used in every storm event rather than during extreme events only; the Council would not want to see it being used regularly. SZC Co. needs to identify under what design event it would expect this outfall to be utilised. Anything less than or equal to a 1 in 30 years return period (3.33% annual probability) would not be acceptable. Given the sensitivity of water level management in this area, this is an important issue - the problem is not that the water is discharged to sea but that it may not be going into the watercourses linked with sensitive habitats. Further information on the impact of this outfall on the management of water levels needs to be provided, to provide assurance that this will not lead to unacceptable ecological impacts.
77. The fact that the need for this new outfall has been identified indicates that modelling of the management of surface water on the Main Development Site has been conducted. This information should be provided to the Council.
78. Users of the coast path are likely to be disrupted during construction, maintenance (e.g. if blocked by shingle) and removal of the proposed temporary outfall pipe. It is indicated that the pipe would not obstruct the coastal path and this needs to be ensured to be the case. Consideration should be given to adding signs warning beach users of potential sudden and large flows. The structure should be designed to be safe to avoid people and animals from getting inside.
79. Whilst the outfall pipe will cross the Suffolk Shingle Beaches CWS, the CWS will already have been removed to build the HCDF so there will be no additional direct ecological impact.
80. The Council notes that the outfall would add to the 'industrialisation' of the beach area, but it is not considered to be additionally significantly adverse in the light of other associated beach activity.

Construction parameters

81. The new stockpile is noted. It is unlikely to result in significant additional landscape or other impacts, and even then, impacts will be temporary.

Pakenham Fen Meadow

82. The principle of an additional SSSI compensation area at Pakenham is welcomed as it gives a greater chance of successful habitat creation being achieved, provided that works have no impacts on the existing adjacent SSSI and CWS.
83. In the light of discussions with Pakenham Parish Council, the Council has questions about the proposal which are not answered by the Consultation Document:
- a. Will there be wider public access to the land either through improvements to existing public rights of way or through new permissive paths and, if so, can this be reconciled with the ecological objectives?
 - b. What is the impact of revisions to management of the water environment on the existing SSSI and preserved Pakenham Watermill?
 - c. How will the fen meadow be managed in the long term and will there be adequate funds to do so?
84. Archaeological evaluation in the form of trial trenched evaluation, subject to an agreed WSI is necessary, followed by mitigation as appropriate – as advised previously for the other proposed sites at Benhall and Halesworth. This work should be undertaken at the earliest opportunity given the high archaeological potential of this area, but not necessarily pre-consent. palaeo-environmental assessment will also be required in flood zone areas.

New Bridleway Link between Aldhurst Farm and Kenton Hills

85. The Council welcomes the proposed provision of the new bridleway link between Aldhurst Farm and Kenton Hills and seeks further information on the expected delivery timescales of this link and the proposed form of the bridleway crossing of Lover's Lane.
86. Consideration should be given to whether in the operational phase, following removal of the lagoon to the south of Lover's Lane and the secondary access ghost island, the crossing point can be located closer to the south end of BW19 to match the desire line of users. It is currently envisaged that the changes to the alignment of Lover's Lane in this area should be able to provide the necessary visibility for a safe crossing point.

H. PROPOSED CHANGES TO ASSOCIATED DEVELOPMENT SITES

Southern Park and Ride

87. The Council welcomes the proposed change in extending the north west bund of the site, to provide additional screening to local views, which the Council is aware was of particular concern locally.
88. The Council has no concerns about changes to order limits at the Southern Park and Ride. We note that archaeological evaluation has been completed and mitigation areas are defined. Mitigation is required prior to site preparation works, and construction of bunds and landscaping/planting.

Sizewell Link Road

89. The Council acknowledges that extensions to order limits may be justified in order to provide a sustainable drainage strategy, and the Council has no objections to the proposed highway changes (set out at paragraph 5.3.9) or the changes to the highway drainage proposals (paragraph 5.3.11) subject to agreement of the detailed design, and the following comments being addressed:
- a. The number of highway drainage lagoons being as few as necessary;
 - b. The impact on the routing and amenity of Public Rights of Way to be fully assessed and relevant schedules amended, as necessary;
 - c. If it is likely to contain standing water, the need for protective fencing to be assessed during detailed design;
 - d. Access to lagoons to be provided to allow for future maintenance requirements;
 - e. Pumping to only be used as the last resort;
 - f. Any new drainage basins to be designed to maximise their long term ecological potential – but this should not be seen as a replacement for essential mitigation;
 - g. Notwithstanding the Council's aspiration that the SLR becomes a temporary road rather than permanent, proposals by SZC Co. for a permanent SLR need to be designed to comply with the highway authority's requirements for adoptable roads, and early discussions need to be held with the authority;
 - h. Any extension to order limits to be scoped in for archaeological assessment. Some archaeological evaluation has been completed along the Link Road, however, further evaluation is still required, to be followed by mitigation as appropriate; and
 - i. Assessment of whether the additional woodland loss now proposed will have an additional adverse impact on roosting, foraging or commuting bats (this is not picked up in Table 5.2).

Two Villages Bypass

90. The principle of the highway changes to allow for visibility at junctions (set out at paragraph 5.4.20) is considered acceptable.
91. The Council is disappointed that the proposed changes introduce further habitat loss, with removal of part of Nuttery Belt (which is a UK Priority habitat). The rationale for this loss is not clear in the Consultation Document, although it is noted that it may be avoided following more detailed design work. Table 5.3 identifies that further survey work is required (particularly for roosting bats). If part of the woodland is to be lost, this survey work is essential, although the Council strongly prefers that the final design avoids this loss.
92. Paragraph 5.4.28 concludes that the loss of part of Nuttery Belt is not significant enough to alter the conclusions presented in the ES; however, in the absence of the identified, required, survey work, it is not possible to support this conclusion at this time.
93. It is noted that mitigation for the loss of flood plain grazing marsh (a UK Priority habitat) in the form of habitat quality improvements is proposed, although no details are provided, as SZC Co. propose this to be part of the outline Landscape and

Ecology Management Plan (oLEMP) for the scheme. In the absence of details on what improvements are proposed, the Council cannot be confident that the improvements will be adequate to mitigate the habitat loss that is identified in the ES and therefore it is not possible to make comment further now.

94. Any extension to order limits should be scoped in for archaeological assessments. Some archaeological evaluation has been completed along the Two Village Bypass, however, further evaluation is still required, to be followed by mitigation as appropriate.

Other Associated Development Sites

95. In general, the Council has no concern about the proposed changes to order limits in section 5.5. For the Yoxford Roundabout order limits (Figure 5.14), the Council requests that SZC Co. confirms whether the revised order limits will be taken forward to detailed design, as the revised carriageway alignment is close to the eastern boundary of the order limits.
96. It should be noted that archaeological mitigation areas are still to be agreed for Yoxford Roundabout, and for both Yoxford Roundabout and Northern Park and Ride, mitigation is required prior to site preparation works, construction of bunds and landscaping/planting.

I. CONCLUSION

97. As referred to throughout this response, many of the proposals within the Consultation Document are welcomed in principle but lack detail and assessment at this stage. The Council would welcome further dialogue with SZC Co. to better understand further details of the current proposals, and the evidence base which has led to them.
98. Notwithstanding this need for additional information, the change proposals set out in this Consultation Document are welcomed by the Council as they go some way to address concerns raised in the Council's [Relevant Representation](#).
99. It is of high importance to the Council for SZC Co. to pursue the development of these proposals, and to further improve these and other aspects of their scheme as set out in this response and in the Council's [Relevant Representation](#). Further evolved and implemented solutions to these concerns will be imperative not only for this Council but for Suffolk's communities.
100. The Council is looking forward to continuing to work with SZC Co. to aim to resolve the issues raised, overcome challenges, and find suitable mitigation measures to enable these changes which the Council considers as required.

APPENDIX: QUESTIONS ABOUT THE CHANGE CONSULTATION

Submitted to SZC Co. by Suffolk County Council and East Suffolk Council on 30 November 2020

It is clear from the Proposed Changes documentation that there are a number of areas of evidence that you are working on that will be available only at the time of the submission of your proposals to PINS. However, there is a series of issues where it would be helpful to have greater clarity on your assumptions and any already available background information that has not been included within the material now published. Much of this information will be of key importance in enabling East Suffolk and Suffolk County Councils to come to an informed response on these matters by 18 December.

Freight Management Strategy

Through all stages of consultation, it has always been the Councils' position to achieve an as sustainable as possible transport solution for the construction of Sizewell C. To that end, both Councils have continued to promote the potential use of marine and rail to transport freight to/from the site – understanding that this brings challenges of its own that need to be addressed. Whilst the Councils cautiously welcome the efforts being made to attempt a move towards a more sustainable solution, additional information is required on the potential impacts of these changes. These questions have attempted to treat the proposals holistically given the interaction between the rail and marine elements of the proposals. There are also questions with regards to the strategy in the Environmental Protection section below.

1. Table 3.1 presents a preferred modal split for material transport; this is supported by paragraph 3.1.12 which sets out that "in an ideal world, SZC Co.'s contractors believe that the modal split set out in Table 3.1 would be desirable, if sufficient capacity existed". The Councils would like to query, whilst these figures may be *desirable* to SZC Co., what is the upper limit of what is *achievable* with regards to the transportation of freight materials by sustainable transport modes to meet the expectations of the Councils? What total proportion of materials could be transported by marine and rail and why do 40% of materials have to be transported by road? To understand what the opportunities may be to maximise sustainable transport at different times, it would be helpful to see a version of Table 3.1 profiled by time as well as mode over the life of the project please.
2. If sea freight was increased further to a maximum level, would this reduce the number of/remove night time trains or /and further reduce HGVs? If either was possible, we would like to discuss the impacts and implications of each option, with a focus on the impacts on residents.
3. With reference to Table 3.1, with sufficient storage on site, could concrete powders also be rail hauled to site? If there is not storage for these materials on site, where are they likely to be?
3. Based on the information supplied in Chapter 3 of the consultation document, the enhanced delivery of materials by sea (particularly bulk materials) appears to potentially provide a window of opportunity to deliver the improvements necessary for day time haulage on the railway. Could this be an option, particularly if the GRIP can be streamlined to allow earlier delivery? We would strongly support any efforts from SZC Co. and Network Rail to do so, as this could significantly reduce the environmental impact of rail haulage (and provide an important legacy benefit).
4. Could SZC Co. confirm whether they are considering the following options and their impacts with Network Rail (as indicated in the consultation document):
 - a) Running train over 6 days/nights a week – can SZC Co. confirm if the proposal is for 6 nights Sun-Fri or 6 nights Mon – Sat?

- b) Increasing the length/payload of trains;
 - c) Exploring practicality of rail haulage of all materials? and
 - d) Locations of signals to avoid blocking of level crossings (such as in Woodbridge and Saxmundham).
5. Further information is sought on what appears to be a difference between capacity of rail and marine and the reality. This may relate to the source of materials, as above, but we request further clarification on the points below as it will be difficult for the Councils to balance the different impacts and be able to respond in an informed way:
- a) At paragraph 3.2.5 we are told that the capacity of each train is equivalent to that of 67.5 HGVs based on 1,250 tonnes divided by 18.5 (one HGV in this cases). For clarity this would be 135 HGV movements. However, at Table 3.4 the additional train equates to a reduction of 25 HGVs (50 movements). In this case, why is the potential impact of the reality of an additional rail movement significantly less than the calculated reduction?
 - b) Table 2.4 also indicates that Options 1 and 2 for the BLF would equate to a reduction of 25 HGVs (50 movements) and Options 3 and 4 would result in reductions of 50 HGVs (100 Movements). However these figures do not directly compare with the tonnes of material set out at Table 3.6 (and what has previously been stated about one HGV equating to 18.5 tonnes), which indicate Options 1 and 2 could deliver as much as 40 HGVs (80 movements) daily and Option 3 and 4 would be considerably more than this given it has seven times the capacity.
 - c) It is understood that the temporary BLF would not be open all year around; how would this affect an annual profile of HGV movements; would the same restrictions to daily and quarterly HGV movements apply all year around given these limitations? Would it result in a greater proportion of materials transported by rail during Winter months and greater by marine in Summer months? And, if there is no marine unloading in the winter, is any gap likely to be made up by more road or rail? Therefore, could night-time train operation be seasonal? In answering this, please reference how you envision the additional stockpile parameter requested fitting into this complex arrangement?
6. Para 3.2.8 implies that LEEIE could continue to be used for rail until at least 2028 if there is a four-train operation. Is this correct? If it is, would you still commit to no unloading of trains overnight at the LEEIE as has been reassured in the past by SZC Co? Would this have any impact on peak traffic movements in the area?
7. In para 3.2.9, there is reference to further studies being undertaken to look at the possible impact of a fifth train on the passenger timetable. We would wish to see this as soon as possible as, again, it may affect the comments that we make on this consultation. Recent correspondence from Network Rail indicates that there are no changes to the passenger rail network proposed in forecasted timetables, the Councils have reservations regarding the potential impact of changes to the passenger timetable.
8. What further assessments are likely to be undertaken on rail noise and the impact of the BLF and are these likely to be shared with the Councils in the period before 18 December?
9. The numbers in terms of reduction of HGVs appear potentially significant but what is the identified/assessed reduction in impacts associated with it? (It is considered vital to establish a justified balance of impact going forward to ensure that sustainability is achieved, and mitigation is correctly apportioned to the most impacted areas).

Environmental Protection

10. P.36 Noise and vibration: Could you confirm why you have not classified the greater number of occurrences of the maximum noise event as a material change? (because night-time disturbance will be greater).
11. Please clarify why one train is not classified as two movements in the same way that HGV movements are?
12. Rail movements will occur between 23:00 and 07:00, this period is regarded by many important guidance documents as night-time and is subject to a higher level of sensitivity in terms of noise impact. How will sleep disturbance be avoided, prevented, or mitigated?

Coastal (conversation taking place 27.11.2020 with EDFE)

13. HCDF – need further detail including a DCO / Change profile comparison. More information on detail, impact assessment and potential mitigation is required to allow a view to be taken.

Ecology

14. Will the changes proposed to the HCDF mean that the soft material covering it are lost / need recharging earlier in the life of the station? If so, we need to consider that the long-term impacts on this part of the Suffolk Shingle Beaches CWS would be accelerated, potentially resulting in a worse long-term impact than that assessed in the ES.
15. It is unclear if the additional woodland loss now proposed for the Sizewell Link Road will have an additional adverse impact on roosting, foraging, or commuting bats? If this is still to be assessed, then this must be included in Table 5.2.
16. SSSI Crossing: with regard to para 4.5.6 on the causeway, can we have more clarity on the reduction of the length of the Sizewell Ditch which is undercover and out of daylight as a consequence of moving from culvert to a bridge?
17. Pakenham Fen Meadow (SCC only): On the Pakenham proposal, has any thought been given to the impact of the creation of fen meadow on downstream flows? In particular this is because immediately downstream is the mill pond of Pakenham Mill, a working watermill owned by the Suffolk Building Preservation Trust.

Landscape

18. Please confirm if the proposed water storage area is to be temporary or permanent? There is potential legacy benefit to local farming activity if it is to be retained and we would be keen to discuss this opportunity further.

Surface Water Drainage

19. Water management zone 7, 8, and 9 were said to discharge to WMZ 1 or 2 prior to CDO construction, is this no longer the case?
20. Please provide clarity on the parameters for when the temporary outfall would be used, we understand from the documents it is for approximately a two year period and is designed to function for extreme storm events (greater than 1 in 30) only.
21. From our reading of the document, WMZ5 is being reduced in size in order to account for the location of the new water storage area, both of which have been shrunk in capacity. What is the consequence of reducing the size of the two basins? There needs to be an assessment and balancing of all impacts please.

If we can have a response to any of these questions before 8 December it would enable us to include it within our response to the consultation.

We look forward to hearing from you.

Michael Moll, SCC

Lisa Chandler, ESC

27.11.2020

From: [REDACTED]@suffolk.gov.uk

Sent: 17/12/2020

To: sizewell@edfconsultation.info

Subject: Response to the latest Consultation on proposed Changes to the Sizewell C Project

I write both as the Suffolk County Councillor for Blything Division (covering the town of Saxmundham and the parishes of Blythburgh, Bramfield, Darsham, Dunwich, Kelsale-cum-Carlton, Middleton, Theberton, Thorington, Walberswick, Wenhaston, Westleton and Yoxford and personally as a long-term resident of Saxmundham.

In principle I welcome proposals that remove some of the HGV movements from our roads and support using rail and sea to deliver more bulky freight to the proposed Sizewell C site BUT it strikes me that your proposals are designed to look good, without supplying the necessary proof that they are deliverable. It would be churlish not to welcome them, but there are considerable reservations...

First an increase in rail activity. Welcome yes, but the disadvantages on local communities along the East Suffolk line have not been addressed and therefore I cannot give the proposals an unqualified welcome. Here I have an interest to declare: I live about 50 metres from the railway line in Suffolk and do not welcome freight being delivered through the night. The noise factor is bad enough, and I accept that problem can be mitigated in part by installing continuous welded rail and sound baffles, but the vibration effects are not able to be mitigated. My house was built in 1849 on Victorian foundations and I believe it could be materially damaged by the many heavy (c2000 tonnes) freight trains. I will require, via legal proceedings if necessary, EDF Energy to survey my house before the start of the project (if it is given the go-ahead) so that we both have an agreed starting point and can judge subsequent damage against a proven and agreed baseline. Of course the best solution here is for EDF Energy to fund Network Rail to build a passing loop in the Campsea Ashe area so that almost all train deliveries can be made during the day. Your unwillingness to agree to this modest request is galling and arrogant.

Greater use of the Beach Landing Facility and a 'jack-up' jetty with conveyor belt unloading facility is again welcome in principle, but difficult to accept in reality because of the great harm that is likely to be inflicted on the wildlife of Minsmere RSPB Reserve and also on the coastline south of Sizewell, notably at the 'problem' points of Thorpeness and to the immediate south of Aldeburgh. Mitigation measures are lacking and the likely and real harmful effect is not contemplated nor mitigated. The modified proposals for long-term coastal protection at Sizewell C are still judged as ineffectual by Local Authority experts that I have consulted and this is a matter of concern now, but more so for next generation living in Blything Division and elsewhere.

The pylons on site still remain. This is unacceptable especially as the County Council has produced a report showing that the electric cabling can be incorporated underground. I have seen the EDF Energy response to this report which by no means invalidates the original assertions, and this matter will continue to be pursued with both you and the Planning Inspectorate. Disagreement is one thing, but arrogant and inadequate responses from you can not be acceptable both here now and never.

The rest of your proposals are relatively minor and not worth individual comment, except to say once again that the D2 Road Route proposed in the 1990's by Layfield remains clearly the best route towards site, and it is absolutely scandalous that EDF Energy has not given

this the serious attention it deserves. The present proposed route to site, which adds nothing long term to the Suffolk strategic road network, is second-rate and second-class and I will continue to press the County Council to require you to remove this road at the end of the construction period, if it does go ahead.

I have seen the response from the County Council to this latest consultation, and indeed helped to shape it, and I support it totally. I have also discussed with many of the Parishes I represent the concerns they have, and I have seen their responses, all of which I also support without contradiction. The same goes for the response from Saxmundham Town Council.

You must by now be aware that what EDF Energy says is not trusted by local people. This latest consultation has been regarded by many as unnecessary and there is scepticism that your proposals will ever be carried into reality, meaning that most of what you say in this latest Consultation is merely window-dressing. I hope the Planning Inspectorate see through the thinness of many of your proposals and the so-called facts that back them up. So much more concrete evidence should have been shared to back up your aspirations, but such evidence as you have has not all been placed into the public arena for the benefit of local people and expert County Council Officers; the latter tell me at every juncture that they need more facts and figures from you for justification purposes and also enable them to test your proposals against reality. I regret to say that this lack of detailed information is scandalous and disingenuous.

This part of Suffolk will be badly scarred for the 10-12 years of construction and for a further half a generation (c10 years) thereafter whilst the flora and wildlife recovers and provides some of the mitigation required. And where is that very mitigation in the widest sense during the first three years of construction? You know as I do that the answer is that it is virtually non-existent.

In summary, this latest Consultation exhibits many signs of being a sham. The local community is increasingly united against this project as will be made very clear during the Planning Inspectorate process, not least by lawyers acting on behalf of the County Council and, doubtless, others too. The economics of the project come directly from the madhouse and your proposals are being made at the wrong time, in the wrong place (the site is too small, so cannot be described as a 'carbon-copy' of Hinkley Point C), with the wrong economic justification. This timid Consultation helps prove these points and I, who was at one time supportive of the idea of a Sizewell C development, have come, through processes of logical thought and reason, to see that it is wrong as a project, wrong for the local community, wrong for attracting the monetary support it needs to proceed (whether or not the Regulated Asset Base proposals are agreed by Government) and should be refused.

Richard Smith, MVO
Suffolk County Councillor for the Blything Division

[REDACTED]



Sizewell C Changes to DCO Plans Consultation Response by Waldringfield Parish Council 17/12/2020

Waldringfield Parish Council (WPC) **OBJECTS** to the Sizewell C planning application and to the proposed changes for the following reasons:

Overview

None of the concerns we expressed in our Stage 4 consultation response have been fully addressed. Issues that we highlighted in our Stage 4 consultation response but that have not been addressed include:

- lack of a full Environmental Impact Assessment
- impact of noise, vibration and light pollution on wildlife
- nuclear waste
- impact on the local economy, particularly tourism
- failure to provide legacy infrastructure and affordable housing in the area

Issues that are mentioned in the *DCO Changes Consultation* document, but that we consider to be inadequately addressed are described below. We therefore consider that these proposals do not change our overall objection to or concerns about Sizewell C, so all our comments on the Stage 4 consultation are still relevant.

Decarbonisation of the Energy Supply

Most of the claims made in §1.3 ("*Decarbonisation and the need for new nuclear capacity*") of the *DCO Changes Consultation* document are false or very dubious. Even on EDF's assumptions, Sizewell C cannot make a positive contribution to the UK's net zero target until 2040, assuming that it is finished on schedule, which is far from certain given the poor record of EPR builds. Even if all goes well, Sizewell C will not be completed before 2034, but there is a need for speedy action to address the current climate emergency which means we need sources of energy that we can deploy much more quickly, cheaply and reliably than nuclear mega-projects such as Sizewell C. Also, decommissioning is not included in EDF's CO₂ calculations for Sizewell C's greenhouse gas emissions.

Environmental Impacts

The new compensatory fen meadow habitat at Pakenham in West Suffolk (§4.9) is, like the other two compensatory habitats at Benhall and Halesworth, miles away and does not adequately compensate for rare fen habitat loss in the Sizewell Marshes SSSI. Legally, compensatory habitats that are at least equivalent to those lost must be put in place **before** construction. However, the proposal is only for work to start at the **outset** of construction: *"Works to create the fen meadow habitat at Pakenham would be similar to those described in Volume 2, Chapter 3 of the ES in relation to Benhall and Halesworth, commencing at the outset of construction on the main development site".* (§4.9.9).

Transport

In the Stage 4 consultation, WPC and others argued that transport by rail and sea should be maximised, to reduce congestion on the roads, and that dropping the 'marine led' option was a massive mistake. We are pleased to see that the marine option has been resurrected, but are still concerned that this is not guaranteed.

As a result of including the 'marine led' option EDF estimate that the number of daily HGV movements will drop from 650 to 500 (typical day's peak) and 1,000 to 700 (busiest days) (Table 2.1). Whilst this is welcome it is still a very large volume of traffic. It is still the case that no assessment has been made of the impact of this traffic on the A12 around Martlesham, the Seven Hills A12/A14 junction or the Orwell Bridge, or of the combined increase due to the extra 2,000 dwellings at Brightwell Lakes and the Felixstowe Port expansion.

This reduction in HGV movements is dependent on the proportion of material moved by road, however: *"Even with unlimited rail and sea capacity, however, the volume of material moved by HGV is unlikely to be less than 40% of the total"* (§3.1.14). At what point in the process it will be established whether this is indeed possible and, if it is not possible, what other steps will be taken to reduce impact on the road system?

The Beach Landing Facility (BLF) is likely to only be operational between April and October. It is claimed that *"Whether the material is bought by sea in the summer or all year round, it still directly reduces the volume of material that it is necessary to transport by other means"* (§3.2.21), but this would necessitate stockpiling large amounts of material during the winter months. However, this is limited: *"bulk material can only be imported to site at the rate it can be accommodated within the stockpiles, the height of which are limited in the Application"* (§3.2.22). It is therefore likely that HGV movements will need to increase during the winter because the stockpiles are running low due to the BLF not being operational. Bad weather during the summer months could also result in larger numbers of HGV movements.

Moreover, the reduction in HGV movements due to the new proposals will not happen for the first two years, at least: *"The potential enhancements in rail and marine capacity would not be in place in time to significantly affect traffic volumes during the early years."* (Table 3.5). 'Early years' are defined as *"approximately two years from the start of construction until the opening of various facilities – particularly the two village bypass and the Sizewell link road."* (§3.1.4 footnote). So any delay in providing the two village bypass or the Sizewell link road would result in the 'early years' (during which there are higher HGV movements) extending even longer than two years.



**National
Trust**

██████████@nationaltrust.org.uk

17th December 2020

By email: info@sizewellc.co.uk

Dear Sir/Madam

**EDF Consultation on proposed changes to Sizewell C DCO application submission
November - December 2020**

Please find below comments from the National Trust in response to the consultation on Proposed Changes (November – December 2020) to SZC Co.'s application for a Development Consent Order which was accepted for examination by the Planning Inspectorate in June 2020.

The National Trust understands that the proposed changes which are being consulted on have arisen as a result of post-submission engagement with stakeholders and further detailed development with contractors.

The proposed changes that are of concern to the Trust are:

- Changes to the design of the permanent Beach Landing Facility (BLF) to make a solid base (grillage) on top of the seabed in front of the permanent BLF better able to receive more regular deliveries by barge and to extend its length;
- The addition of a temporary Beach Landing Facility for the delivery of bulk materials and associated infrastructure and lighting;
- Changes to, and information about parameter heights, with some elements up to an exceptional height of +70AOD;
- Changes to the design and height of the permanent sea defence.

These changes are relevant to issues of concern to the National Trust which have been previously raised in our consultations and discussions with EDF, namely:

- Recreational Displacement (impact on visitor capacity, enjoyment and infrastructure at Dunwich Heath and Beach and impacts on ecology and designated sites)
- Landscape and Visual Impacts
- Coastal Processes

In summary the National Trust's concerns are:

- a. A lot of the changes presented in the document will give rise to physical, visual and aural impacts which have not been assessed.

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- b. Assessment of some impacts will be subject to Monitoring and Mitigation Plans, but these have not yet been provided.
- c. The lack of information about the proposed changes does not alter the position of the National Trust set out in our Relevant Representation. Until the changes are confirmed and all supporting information is provided, we will not be in a position to make significant progress towards a Statement of Common Ground.
- d. The absence of assessments prevents stakeholders being able to comment in a meaningful way, which for a development of this scale and impact is not acceptable. We request that this information is provided as soon as possible and at least a month prior to the start of the examination.

Our comments are set out in detail below, with the proposed change, impact, and request in bold.

Recreational Displacement

The Proposed Changes document introduces four design options for a second **(temporary) Beach Landing Facility** for the delivery of bulk materials. In addition, there would be a conveyor and hopper system that would be installed along the length of the pier which would then cross the beach to a construction area. The proposals would introduce a significant amount of additional infrastructure to both the beach at Sizewell and offshore and require recreational users of the beach to walk under the conveyor. It is our view that **the physical and visual disruptions and noise associated with the construction and operation of two beach landing facilities will further degrade the amenity value of the beach and make this a less desirable area to visit.** Accordingly, it will **further increase recreational displacement to other areas, including Dunwich Heath and beach.**

The consultation document acknowledges that **the construction, operation and removal of the temporary Beach Land Facility (BLF) and changes to the parameter heights** on the main development site to facilitate the construction process would give rise to a greater impact on experience of people using the coast path and beach for recreation, including their experience of tranquillity. However, it does not explore where people will go and any potential changes in recreational usage of sensitive sites as alternative locations. The document states that further assessment will be undertaken to confirm the potential impacts, including consideration of noise and landscape and visual impacts for the options, and this will inform any mitigation proposals that may be necessary. The National Trust strongly agree that this needs to be undertaken. **The assessment should include an updated assessment of recreational displacement to our site, including impacts on sensitive site features and updates to the Habitat Regulations Assessment.** The assessment should also be considered along with the change in anticipated visitors to the SAC from 20,000 to 88,000 which was recently reported to us in response to queries that we raised about discrepancies in the reports submitted with the DCO application. We would have expected this information to be provided at the point of consultation. In the absence of this information we are disadvantaged and until this information is provided we are unable to comment further on this matter.

Consideration should be given to the **creation of a new recreational space close to Sizewell as mitigation.** It is noted that the consultation document refers to the establishment of an independent environmental Trust to manage ongoing re-wilding and biodiversity of the Sizewell Estate. It indicates that this could be expanded to connect parcels of land for re-wilding and habitat creation. The National Trust supports this in principle, but it is not clear if this would form part of any mitigation for the Sizewell C development. It is also not clear if this land would be beyond the Sizewell Estate, if such land has been identified or how this would be delivered. The National Trust request further clarification on this matter.

Landscape and Visual Impacts

The National Trust understand the rationale behind changes to the transport strategy and the benefits that increasing the amount of freight brought to the site by sea would have on reducing the impacts of HGV's on the local area. However, **changes to the design of the permanent BLF and the introduction of a second temporary BLF will have a significantly greater visual impact on the landscape and seascape and a harmful impact upon the character and special qualities of the AONB.**

An additional BLF for use during the construction phase (of potentially up to 400 metres in length with four self-elevating platforms and a conveyor and hopper system) and **changes to parameter heights** for infrastructure and plant are proposed. In addition, an **increase to the minimum height of the permanent sea defence** from +10.2mAOD to approximately +14mAOD and an increase to the maximum height from +14.2mAOD to approximately 15mAOD, plus landscaping, (to address flood risk and the need to comply with the Nuclear Site Licence) is proposed. The changes also indicate that the **sea defence will move further seaward**. These will all, **individually and cumulatively, have an adverse impact upon views from our elevated site at Dunwich Heath and beach and upon the AONB**. However, the information presented in the document is not supported by any detailed or scaled plans, meaningful visualisations or updated assessments. We would have expected any consultation on changes to be supported by these updates and the lack of certainty about the final design of these elements prevents us from understanding the true scale of impacts.

It is noted that use of the permanent BLF is for delivery of abnormal indivisible loads only. The proposed additional temporary BLF would be used for the delivery of bulk materials. The document states that it is operationally not preferable to have both activities taking place on the same facility, whilst also working within the limited window of time afforded by the tidal range. In our opinion this conclusion has not been fully justified.

The document indicates that investigative work is ongoing regarding the freight management strategy. It states that detailed site investigation to finalise materials volumes is continuing, as are discussions with operators about capacity for rail freight transport. It is clear that the four different design options for the BLF will have different capacities and effects. It should be the case that the outcomes of the investigations inform the decision about the design of the temporary BLF. Notwithstanding this, **all four options for a temporary BLF will have an adverse visual impact (to a greater or lesser degree depending on which option is chosen) which it will not be possible to mitigate**. We therefore do not support the addition of a second BLF and associated conveyor/hopper system.

Unlike the permanent BLF, the temporary BLF would operate at night. **There is no detail about the type or quantity of lighting, details of how often the BLF would be used at night, or assessment of its impacts** (including a cumulative assessment with lighting on the main development site and noise assessment). This must be provided when the changes are submitted to the Examining Authority and not left to requirements as the impacts are important in the overall consideration of the development at the point of examination.

The consultation document acknowledges that changes to the temporary Beach Landing Facility may increase the significance of construction phase effects on visual receptors in coastal locations and offshore and alter the nature and significance of effects on the beauty and special qualities of the AONB and Heritage Coast. It identifies that additional work is required to review the scope of assessments, to determine if new visualisations are required and assess the significance on landscape/seascape character, visual receptors and designated and defined landscape/seascape.

It is disappointing that updated information and assessments have not been provided as part of this consultation. **An updated Landscape and Visual Impact Assessment along with details of any landscape mitigation/compensation proposals must be submitted to the Examining Authority.**

These must include revised representative viewpoints, daytime and night-time visualisations (showing infrastructure up to and including the exceptional height parameters) and field surveys to determine nature, scale and extent of effects arising. The plans must show the full extent of the temporary BLF and the conveyor system together. **A cumulative assessment of all infrastructure on and off-shore must be provided with the changes submission.**

A Noise Assessment for the operation of conveyor/hopper system should also be provided.

We have significant concerns that this could have an adverse impact on our holiday cottages at Dunwich Heath, particularly if it is to operate at night. We would have expected a Noise Assessment to be provided as part of a pre-submission consultation to assess this impact and request that this is provided as part of the formal submission of the proposed changes.

Coastal Processes

Changes to the permanent BLF and any of the options for a temporary BLF will introduce additional piles, grillage, metal rods, dredging of the seabed and larger platforms which have the potential to impact upon coastal processes and our land at Dunwich. The quantity and extent of these is not yet known as it is dependent upon the design chosen. Furthermore, a higher barge occupancy could result in larger more persistent scour pits. The method of dredging (depending on which is chosen) may also increase in the levels of sediment suspension and result in a net loss of sediment.

The consultation document also states that **the design of the Hard Coastal Defence Feature (HCDF) has changed and that the toe of the defence has been extended seaward.** Its actual location is vague and hard to understand. No actual dimensions have been provided. As it is proposed to extend further seaward the **risk of influence on coastal processes may increase.** The document states that the design of the sacrificial soft coast defence will be re-assessed to maximise its longevity before re-nourishment is needed. Unfortunately, this information has not yet been provided.

The document acknowledges that the options for the temporary BLF have several pressures that could produce moderate, significant effects on the longshore bars and/or shoreline. It states that further assessment is needed, especially for the SPA/SAC frontage due to its conservation value. This would be informed by numerical modelling and scour assessment for the updated pile, dredge reprofiling and method, and barge occupancy. The modelling will include both the enhanced permanent BLF and the temporary BLF options so that any cumulative effects (interrelationships) can be directly accounted for within the assessment.

It is clear that design, feasibility and modelling are still being reviewed. **It is imperative that detailed designs supported by technical assessments are provided.** Without these it is impossible for us to consider the impacts of such significant changes on our land.

Conclusion

A lot of the changes presented in the document will give rise to physical, visual and aural impacts which have not been assessed. The changes present design options and/or require further technical information, feasibility studies or updated assessments. Furthermore, it is possible that some impacts could be addressed through Monitoring and Mitigation Plans and the S106 Agreement but details of these have not yet been provided. Without this detailed information it is not possible for us to meaningfully assess the impacts on our site Dunwich Heath and beach and the AONB within which it sits. Accordingly, we advise that **the proposed changes do not alter the position of the National Trust set out in our Relevant Representation** which was submitted to the Examining Authority in September.

The information set out in the consultation document presents what could be significant changes to the application. If/when the proposed changes are submitted to, and accepted by the Examining Authority, we will need to consider the impact of these on our site and our position in respect of the above issues. Until we have done so **we will not be in a position to make significant progress towards a Statement of Common Ground**. It is unreasonable to expect interested parties to consider changes to the application at the same time as preparing their written representations based on information originally submitted with the application. Furthermore, participating in the examination whilst also jointly preparing a Statement of Common Ground and progressing discussions on monitoring/mitigation/compensation to inform requirements and/or legal agreements will place added resource pressure on us and other stakeholders. **We request that the final changes in their entirety (with all supporting information) are provided at least a month in advance of the start of the examination.**

We welcome continued discussions with EDF on matters which are of concern to us, including any changes which are submitted to the Examining Authority, prior to the start of the examination.

Yours faithfully

A black rectangular box redacting the signature of Nina Crabb.

Nina Crabb BSc (Hons), PGDip, MRTPI
Regional Planning Adviser (East of England)



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Calls may be monitored for quality control, security and training purposes.

Our ref: SC/

17 December 2020

Dear Sir/Madam,

I am writing to provide Suffolk Constabulary's response to the Sizewell C (SZC) Consultation on Proposed Changes. Building on previous engagement with EDF throughout all stages of consultation regarding the SZC project, the Constabulary welcomes this opportunity to comment on aspects of the proposed changes to the SZC Development Consent Order (DCO) application which are relevant to community safety and policing. These comments should be read in conjunction with the SZC Relevant Representation submitted by the Constabulary to the Planning Inspectorate.

The Constabulary's objectives in relation to the Examination of the SZC DCO application are to understand and address the full range of likely community safety and policing impacts from SZC, and to secure appropriate mitigation to avoid significant adverse community safety impacts and any other unacceptable community safety risks. Any proposed changes to the SZC project which seek to reduce community safety impacts and to address concerns raised by local communities and other stakeholders are therefore welcomed by the Constabulary. However, the changes proposed to the SZC DCO application will not themselves remove the underlying need to ensure adequate policing capacity and specialist resources to address the likely net additional community safety impacts resulting from the SZC project.

Having reviewed the SZC Consultation on Proposed Changes – Consultation Document, the key proposed changes of relevance to community safety and policing are those regarding the SZC Freight Management Strategy (FMS). These changes are relevant as the Constabulary will have an important role in protecting road safety and the functioning of the transport network during the SZC construction period, including a requirement to escort certain abnormal indivisible loads (AILs) safely and timeously. These responsibilities form an integral part of the Constabulary's mission to make Suffolk a safer place to live, work, travel and invest, and they cannot be separated from the Constabulary's wider community safety remit.

It is noted that the proposed increased use of rail freight and additional Beach Landing Facility (BLF) would increase the delivery of AILs by sea (up to 100 per annum) and facilitate a reduction in Heavy Goods Vehicle (HGV) movements. As the primary organisation that ensures the safe use of Suffolk's road network, the Constabulary supports the principle of the proposed changes to reduce HGV and AIL movements. It is also recognised that improving the safety and efficiency of transporting construction materials to the SZC site are objectives shared between the Constabulary and EDF.

However, as drafted the Consultation Document unfortunately provides inadequate information regarding proposed changes to the FMS and their community safety implications. The Consultation Document indicates that AIL movements by sea would remain seasonally restricted but does not

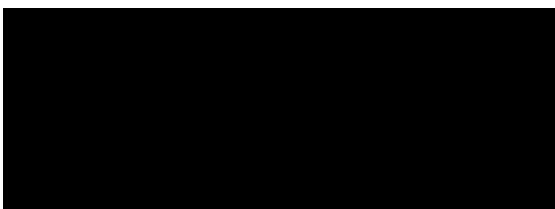
provide a breakdown of the expected frequency, type or size of AIL movements by mode, either under the existing SZC FMS or with the implementation of the proposed changes. As the requirement to escort certain AILs depends upon their type, size and nature, based on the limited information provided to date by EDF it is therefore not possible to assess the extent to which increased AIL deliveries by sea may reduce the volume of road based AILs requiring police escort. It is also noted that the proposed increase in bulk materials transport by rail and sea does not correlate with an equal reduction in volume moved by HGV. This suggests either a concern about the reliability of using an increased rail and marine based solution or a net increase in the volume of construction material which needs to be transported on Suffolk's roads (compared with that stated in the DCO application).

To enable these proposed changes to the FMS to be appropriately factored into the Constabulary's ongoing analysis of impacts from SZC on road safety, AIL escort requirements and police resourcing demands, EDF is respectfully requested to provide a full breakdown of expected AIL movements (by frequency, mode, vehicle size and load type) and to confirm how this relates to indicative AIL movement data for Hinkley Point C previously provided by EDF. Clarity is also sought regarding whether a net increase in the volume of construction material which needs to be transported (compared with that stated in the DCO application) is now anticipated, rather than simply HGV movements being offset by increased rail and sea transport.

This information is needed together with full responses to all outstanding information requests raised to date by the Constabulary to underpin robust modelling of AIL escort requirements and wider policing resource impacts. Given the nature and scale of SZC, it is imperative for AIL escort requirements and associated policing demands throughout the SZC construction period to be planned for based on robust data so that sufficient resource capacity within this specialist area of policing can be provided at the time required to mitigate impacts generated by SZC.

The Constabulary looks forward to continuing to engage positively with EDF to understand and address the full range of community safety impacts from SZC, including to secure appropriate mitigation for net additional police resourcing demands.

Yours sincerely,



David Cutler
Detective Chief Superintendent
Suffolk Constabulary

THE ALDEBURGH SOCIETY

Registered Charity Number 262239 www.aldeburghsociety.org.uk



SIZEWELL C - APPLICATION FOR DEVELOPMENT CONSENT

Consultation on Proposed Changes November-December 2020

The Aldeburgh Society is the civic society for the historic coastal town and cultural centre of Aldeburgh. The objects of the Society are to encourage public interest in and care for the character of the town and its surroundings, and the preservation, development and improvement of general public amenity in the area.

The Society has reviewed the proposed changes to the application by EDF for Development Consent for the construction of two new nuclear reactors at Sizewell contained in the Consultation Document dated November-December 2020. The Society remains fundamentally opposed to the application and does not take comfort from the proposed changes.

We would point out that:

- Further consultations at this late stage only serve to complicate the handling of the DCO application by the Planning Inspectorate and interested parties. All the points in the consultation document can be addressed when the relevant issue-specific hearings are held;
- Some of the proposals now put forward are provisional in any case, with no assurance that they could be delivered. The suggested rail and sea transport proposals are far from guaranteed, and would still leave large amounts of HGV traffic on the roads;
- The envisaged relocation of Sizewell B facilities has not been agreed in advance with Sizewell A;
- The proposed extension of the sea defences, also a surprising addition to the original proposals, could generate sediment movement which could have a damaging impact upon the shoreline in Thorpeness and Aldeburgh.

We query why, if these indeed are serious options, it has taken EDF more than 8 years to propose them. These proposals do not change our overall objection to or concerns about Sizewell C.

The Society remains all the more concerned that this application is having to be examined alongside the application by Scottish Power Renewables (SPR) for the development of two offshore windfarms and their onshore infrastructure, which would have a calamitous and irreversible impact on the same geographical area of Suffolk.

The Society reiterates that it is not opposed to nuclear power, and it supports the Government's net zero target for energy production. However, it views with great concern the damage to the Suffolk Heritage Coast, including the important nationally and internationally protected sites RSPB Minsmere Nature Reserve and Dunwich Heath, which the construction of this very large industrial project would entail. If there were no existing nuclear power station on this coast, the proposal to develop one here would be unthinkable in today's heightened awareness of environmental issues.

The simultaneous application by SPR, involving further major pressures on the same local infrastructure, makes a coherent integrated approach to both development proposals indispensable.

THE ALDEBURGH SOCIETY

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The construction project would inevitably have a seriously damaging effect upon the tourism business and the cultural offerings for which Aldeburgh is renowned and upon which its local economy is largely based. The Society has concluded that the damage to the fragile East Suffolk coastal area – its environment, economy and society - which the project would wreak is too high a price to pay for electricity, which should be generated increasingly by renewable technologies, supported by improved storage capacities and possibly smaller-scale nuclear projects.

The Society has noted that HM Government are entering into discussions with EDF about the funding of Sizewell C as a significant part of their green agenda. This must in no way reduce the thoroughness of the Planning Inspectorate's Examination of the DCO application.

email to info@sizewellc.co.uk

17 December 2020

ABP Comments

Consultation Section	Section Heading	Sub-Section	Section / Paragraph Number	Comment
Freight Management Strategy	Introduction	Introduction	3.1.2	Potential changes to rail movements from those in the original application.
Freight Management Strategy	Introduction	Introduction	3.1.2	Potential enhancements to the permanent Beach Landing Facility (BLF) and options for a second temporary BLF to facilitate materials import by sea
Freight Management Strategy	Introduction	Introduction	3.1.4	The development of a suitable BLF fits directly with our seaborne capabilities.
Freight Management Strategy	Introduction	Introduction	3.1.4	The requirement for a minimum of 2 trains per day in the early year's construction fits directly with both ports on dock rail facilities.
Freight Management Strategy	Introduction	Introduction	3.1.8	We support the work of your contractor and transport logistics teams in further developing the strategy for SCZ construction materials. Sourcing aggregates from sources that are rail or sea connected fits with our existing mature port operations within East Anglia.
Freight Management Strategy	Introduction	Introduction	3.1.9	The potential to operate 5 trains per day for a short period could be accommodated within the Port of Ipswich, subject to additional capital investment for track extensions into larger areas of the existing port estate and appropriate, critical, rail paths being provided by Network Rail (NR). (See Fig 1a, proposed rail route Ipswich)
Freight Management Strategy	Introduction	Introduction	3.1.9	The Port of Lowestoft also has capacity for additional train services, subject to additional but limited capital investment for track extensions into the port estate. (See Fig 2a Lowestoft, ref X & proposed rail route)
Freight Management Strategy	Introduction	Introduction	3.1.9	The proposed enhancements of both the BLF and temporary BLF, particularly with regards to option 3 & 4 would see an increased capability of seaborne freight to the construction site, to which ABP can provide more than enough resource to maximise the cargo volumes by sea.
Freight Management Strategy	Introduction	Introduction	3.1.11	Sustainability is a key part of ABP operations and future developments. We applaud the additional focus in the CoPC on sustainability and the desire to move more material to and from SCZ by rail and sea.
Freight Management Strategy	Introduction	Introduction	3.1.11	If the necessity for HGV road movements remain, even at the much lower suggested level of 40% of total traffic, the Port of Ipswich is only 5 minutes from the A14 junction, 32 miles / 53 minutes from SCZ, with the Port of Lowestoft even closer and immediately adjacent to the A12, only 26 miles / 45 minutes from SCZ.
Freight Management Strategy	Introduction	Introduction	3.1.11	The new Gullwing Bridge being built in Lowestoft will also adjust the traffic flow, facilitating smoother access from the port estate to the A12, potentially reducing journey times further and improving connectivity from the north side of Lake Lothing to the south and SCZ without the disruption that is currently experienced with the low level bascule bridge.
Freight Management Strategy	Introduction	Introduction	3.1.12	ABP stands ready to support the ambition of moving more bulk materials by rail or sea rather than HGV.
Freight Management Strategy	Introduction	Introduction	3.1.12	Table 3.1 Preferred modal split for material transport, aligns with our work on developing a material storage and handling capability at both ports, using the already established rail, sea and land connections.
Freight Management Strategy	Introduction	Introduction	3.1.13	As addressed earlier, whilst a significant volume of material will still have to be moved by road, both the Ports of Ipswich and Lowestoft are within 32 miles / 53 minutes journey time by road from the SCZ development site.
Freight Management Strategy	Introduction	Introduction	3.1.13	Both ports have readily available road access to main routes, with enough staging areas for a significant number of HGV's to be held within our port estates. (See Fig 1a & b Ipswich and 2a Lowestoft, ref X & Y)
Freight Management Strategy	Introduction	Introduction	3.1.14	ABP believe that with further engagement and planning, rail and sea supply routes could increase more than the assumed percentages within those shown in your Table 3.1 'Preferred modal split of material transport'. Our own review suggests that a great deal of volumes suitable for these types of modality can be accommodated within our two ports for onward seaborne and rail deliveries. (See Fig 1 a & b, Fig 2 a and Fig 3 a, section 1 & 2)
Freight Management Strategy	Introduction	Introduction	3.1.14	The 40% suggested for HGV movements can also be easily accommodated within both ports. We have enough room within our port estates and easily accessible main road connections. (See Fig 1a & b Ipswich and Fig 2a Lowestoft, ref X & Y)
Freight Management Strategy	Introduction	Introduction	3.1.16	We stand ready to support further consultations with SCZ and their chosen supply chain partners to increase the rail and sea transportation movements
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.1	As detailed within this section, it is suggested that two freight trains per day, operating from the East Suffolk line is likely within the early years. Both the Port of Ipswich and Lowestoft can accommodate this requirement and have potential to increase train movements with relatively straightforward and modest investments, subject to NR providing sufficient enough rail paths.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.1	Efficiency can be generated by providing additional rail sidings on our port's estates, to pre-load freight wagons well ahead of required onward delivery from both ports. (See Fig 1a Proposed Rail Route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.2	We are fully supportive of the green rail route as detailed.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.2	As previously detailed, we believe the additional efficiencies available for holding wagons ready for collection during the evening at both ports is available.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.5	The suggested train layouts and wagon lengths are well within both ports' capabilities, subject to minimal capital investment for track extension within the port estate.

Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential changes to rail movements assumed in the DCO Application	3.2.5	We believe that further engagement with SCZ, could see the possibility for longer trains and greater tonnages per train from the assumed 1,250 tonnes currently suggested. <i>(See Fig 1a, proposed rail route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)</i>
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	The potential to increase rail capacity	3.2.6	Subject to appropriate consultation and engagement we are fully supportive of development of rail capacity as detailed in Table 3.2 'Number of trains per day over the construction period', both in terms of the number of trains operating and the amount of tonnage that could be transported.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	The potential to increase rail capacity	3.2.6	Our only caveat to this would be the ability of NR to provide additional rail paths at operating times suitable for material delivery.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	The potential to increase rail capacity	3.2.9	We support that the potential is being investigated to operate additional train services to move bulk material to the SCZ development site. ABP is keen to establish closer collaboration to establish what rail layout at our ports would most suit the increase in rail movements, which in turn would also drive significant efficiencies. <i>(See Fig 1a, proposed rail route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)</i>
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	The potential to increase rail capacity	3.2.9	Further we are confident that the suggested train layouts and wagon lengths are well within both ports' capabilities and if an opportunity arose to allow them to be larger, subject to appropriate signalling on the designated rail routes, we would be able to adapt our port track layout accordingly subject to consultation.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.13	Whilst we understand that the current payload is limited to some 1,250 tonnes per train, our own data suggests the potential for higher tonnage volumes could exist. which could be achieved with the appropriate loading equipment, enough sidings space at the receiving rail sidings, appropriate signalling and enough storage space within the Virtual Quarry (VQ) located at either port. <i>(See Fig 1a, proposed rail route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)</i>
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.13	The stated aim of using standard HGV aggregate lorries, subject to more detail on material density, could see a 10-20% increase in tonnage per road movement, particularly for cementitious bulk material, which would reduce the number of HGV moves required by a similar proportion which of itself is not insignificant.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.13	This improved tonnage per HGV could be achieved by a rigorous loading process, with suitable equipment such as front-loading shovels with weigh cells and camera technology, allowing the operator to achieve better loads, or development of specific loading hopper technology which allowed the operator to 'trim' the load to a pre-determined optimum. In turn this would give a very accurate load per truck combined with integrated weighbridge technology allowing for maximum legal capacities to be achieved, subject to suitable investment at either of our two ports.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.14	We agree on the logical assumption that by maximising each train movement tonnage, up from the assumed 1,250 tonnes per train, will result in a reduction of HGV deliveries as described.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.14	Further, given ABP's experience of aggregate trains regularly leaving the Port of Ipswich already at some 1,560 tonnes laden cargo weight, the additional 310 tonnes per train would, assuming only 18.5 tonnes per HGV, lead to a further reduction of some 16.7 trucks per day (33.5 HGV's both ways) for each train operating. So 33.5 two-way HGV trips removed for one train, 67 for two trains and in the case of five trains per day, a reduction of 167.5 two-way HGV trips per day removed from Suffolk roads through maximising rail loading capability. <i>(See Fig 1a, Ipswich)</i>
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.14	Our own data in terms of HGV loading activities in ABP ports suggests that for cementitious material movements, the tonnage could be increased to closer to 26 tonnes per HGV from the 18.5 tonne figure used in the CoPC, thereby further decreasing the overall road miles across the development project. This increase in payload experienced could represent up to a 40% reduction in HGV moves, again by focussing on the optimising of loading.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from additional rail movements	3.2.16	It is certainly possible for vessel loading operations to take place 6 or 7 days per week at both ports', thereby increasing the likelihood of additional train services and, therefore, a corresponding reduction in HGV movements. Additional rail path capacity could be obtained on weekends.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.19	ABP is the UK's largest port operator, with 21 ports and with the UK's largest inland rail terminal. We have substantial and proven experience in the discharge, loading, storing and management of aggregate materials.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.19	We fully support the development of additional BLF capacity at the SCZ development site. Our experience in moving vast amounts of material from rail, to shore to ship and vice versa gives us a high level of confidence that additional volumes to be moved via sea can be most definitely accommodated.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.19	Both ports can operate 24 hours per day, are not 'locked', thereby relatively unlimited in vessel activity in relation to tidal changes which take place throughout the year, further increasing the seaborne cargo opportunity.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.21	ABPMer, our inhouse marine consultancy have detailed information relating to weather and marine patterns on the East Suffolk coast.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.21	It is likely that only minimal disruption to material delivered by sea will occur during the April – October operational window. Even with the average disruption identified, we are confident on our ability to handle enough vessels to provide material in greater volumes than the CoPC requires.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.21	The benign harbour areas for both ports leads to the safe expansion of marine activity, not only during the 'campaign' periods between April and October, but potentially at other times. As stated, the longer the seaborne material supply can be maintained, the lower the overall HGV requirement will become.

Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.22	Whilst we accept that it is difficult to present a definitive picture of how the different options would impact on HGV movements, we are committed to working closely with SCZ to present additional seaborne options, including but not limited to barge and self-discharge vessels, possibly operating outside of the proposed 'Campaign' periods.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.22	The ability to store considerable amounts of material at either of our ports, all of which have trimodal capability, i.e. sea, rail and road access and providing both VQ and logistics buffering facilities is substantial. With over 64 acres of land in Ipswich and some 15 acres of land in Lowestoft, various options for intermediate storage, including bulk powders, exists or can be readily developed.. (See Fig 1a & b Ipswich, ref Indicative Cargo Capacity & Berths 1,2 &3 and Fig 2a Lowestoft, ref 1,2,3&4)
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.22	Pre-cast concrete tunnel segment production can also be accommodated at both ports and, of course, with 3 modes of onward transport available, providing tremendous flexibility and resilience. (See Fig 1a Ipswich)
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.23	We are supportive of the flexible transport strategy balanced against acceptable environmental considerations.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.23	Our own calculations support SCZ's ambition to reduce HGV movements to around 40% of the predicated volumes and, subject to increasing projected tonnage to both vessels, rail deliveries and HGV's, reduce the overall number of material movements required.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.24	The ability of both ports to provide adequate land to develop VQ's is clear ahead of the proposed 2025 start date. This would help ensure a steady flow of material to the development sites during 2025-2027. (See Fig 1a, ref Land available for use and Fig 2a, ref X & Y)
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.24	We would welcome further engagement on the inbound logistics for 'fill and cementitious material', Cementitious material is suitable for inbound train movements whilst fill material is more easily capable of being moved by sea, rather than road or rail., potentially helping to provide enough outbound rail capacity from the VQ to the SCZ development site.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.25	A deeper rail and seaborne technical review would in turn would help support the data provided in Table 3.4 'Potential peak HGV numbers with rail and BLF enhancements'.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.25	Our data suggests higher load factors can be achieved.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.26	Subject to NR rail path availability, both our ports can operate 6/7 days a week, thereby adding an additional day per week for material flows to and from the site.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.27	ABP agrees that the increased rail and marine options will reduce HGV numbers significantly.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.27	Further material could be supplied to the VQ by both rail and sea, thereby reducing distant HGV inbound requirements.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.29	ABP believes that our experience in marine matters and bulk material handling can be utilised to reduce, as much as possible, the indicative HGV movements on local roads. This would include options to increase the tonnes carried by vehicles specifically dealing with cementitious materials, above the current proposed 18.5 tonne average detailed within the CoPC.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.30	It is critical to develop, in our view, the additional temporary BLF, planned to be in place for 2027/28, to enable maritime delivery of seaborne materials to the SCZ development site, in turn reducing the HGV volumes.
Freight Management Strategy	Increase in the frequency of freight train movements to facilitate bulk material imports by rail	Potential for HGV reductions from an increase in the transport of materials by sea	3.2.30	As stated, after 2027/28 we understand that the main bulk materials will be aggregates for concrete. Whilst accepting that most of this material could be delivered by train, alternative sources for coastwise marine deliveries of material could take place, either via the VQ for stock holding and onward transit, or direct to the BLF during the main civils phase for 2030 and beyond.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.1	We are supportive of the enhancement of the proposed BLF and agree that it could be utilised for both construction materials and Abnormal Indivisible Loads (AILs), delivered by barges from a muster port, subject to final design.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.2	We have carried out a detailed review of our capabilities to support significant barge movements from both ports, which would act as the transshipment staging points or Logistics Transfer Facilities (LTF) serving the VQ. (See Fig 1a & b Ipswich, ref Berths 1,2 & 3 & 4 & Indicative Cargo Capacity and Fig 2a Lowestoft, ref 1,2,3 & 4)

Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.2	Further we have in-house property development capability to provide covered storage for the high levels of assumed AILs.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.2	Additional reviews of local weather patterns may lead to wider operational windows for both barge and self-discharge vessel activity outside of the proposed campaign periods. <i>(See Fig 3a, section 1 & 2)</i>
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.5	ABP has the capability with inhouse partners, such as ABPMer and UKDredging to provide support with consultancy services to assist SCZ in better understanding the requirements for surveying and reprofiling the seabed in the circumstances as described.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	The proposed development in the DCO Application	3.3.6	We are supportive of the proposed demounting of the platform deck, as per Figure 3.2 'Typical visualisation of permanent BLF during the operational phase', but assuming that it could still be utilised for a wider operational window, subject to weather conditions.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Description of the potential changes	3.3.9	We are supportive of the outline designs to enhance the permanent BLF and for the provision of a new temporary BLF as detailed within the CoPC.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Description of the potential changes	3.3.9	The proposed revisions facilitate an increase in material delivered by sea, including bulk and AILs.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Enhancing the design of the permanent BLF	3.3.10	We support, subject to appropriate environmental review, the development of a larger, permanent BLF. Our ports can store AILs as well as facilitating their onward delivery by sea via our Port of Ipswich existing Ro Ro ramps. <i>(See Fig 1a Ipswich, ref 1,2 & 3 RoRo)</i>
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Enhancing the design of the permanent BLF	3.3.10	Further, the Port of Lowestoft has an available storage area which has historically been used for the inbound delivery by sea, storage and then road delivery of heavy equipment to the Sizewell site. <i>(see Fig 2a, Lowestoft, ref Y)</i>
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Enhancing the design of the permanent BLF	3.3.13	Our own calculations for vessel movements during the suggested campaign periods support the need for this enhanced BLF design to increase additional bulk materials delivered by sea which in turn will reduce the amount of HGV's utilised during the construction phase.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Enhancing the design of the permanent BLF	3.3.13	The proposed volume of 100 vessel movements per annum can easily be accommodated from our ports, however any capacity constraints in the ability of the BLF to receive bulk materials would be counterproductive.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Enhancing the design of the permanent BLF	3.3.13	Further clarity on the types of material handling equipment at the BLF is important, but we would suggest a combination of excavator equipment on barges as well as a suitable conveyor located directly onto the BLF. Clarification on whether it is intended that this mechanical handling capability will be provided at, or on the BLF would be useful.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.15	The addition of a temporary BLF is supported by ABP, as this will facilitate a greater level of material to be delivered by sea during the construction period. However, this must be a robust development, capable of handling a high volume of seaborne cargo over the life of the project.

Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.15	Whilst the permanent BLF can accommodate both AILs and bulk material, the additional BLF should ensure that any capacity constraints or short-term delays in the ability of the permanent BLF to receive materials, would be significantly mitigated.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.16	Whilst we accept that the temporary BLF could be in place for the short term, 2027/28, we support the suggestion to extend its operational life to facilitate additional material supply by sea, both in terms of reducing HGV movements, but to accommodate flexibility in terms of any unforeseen changes in the construction time line.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.17	ABP has carried out a high-level review of the four suggested options. Whilst we can support Options 1 & 2, we have spent time further evaluating the developments of Option 3 & 4 and believe they provide a major improvement to the initial proposals.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.17	We are confident, subject to a range of investments related to handling equipment at both our ports, that we can accommodate the suggested volumes of material storage and onward delivery by sea for all 4 options but have the potential capacity to handle more material if required, exceeding the 1.4 million tonnes suggested.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.17	The annual material volumes could be accommodated in full at Ipswich or split across both Ipswich and Lowestoft, if preferred. Our loading and ship handling capacity can accommodate much higher levels of seaborne cargo if required. Option 1 70 barge deliveries per annum, 200kt of bulk per annum Option 2 100 barge deliveries per annum, >200kt of bulk per annum Option 3 400 barge deliveries per annum, +/- 1.4 million tonnes per annum Option 4 460 barge deliveries per annum, > 1.4 million tonnes per annum
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.18	ABP support the principle of two separate BLF operations, thereby mitigating any construction delay caused by congestion with a single BLF.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Providing a new temporary BLF	3.3.18	Simultaneous use of both BLF's will facilitate the discharge of bulk materials and AILs, thereby increasing the capacity and opportunity of materials to be delivered by sea.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 1: Temporary BLF, no pier - lowest capacity	3.3.19 / 20 / 2	We agree that the design of Option 1 would limit the delivery of material to the SCZ development site, although we are confident that ABP could easily support additional barge deliveries.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 1: Temporary BLF, no pier - lowest capacity	3.3.19 / 20 / 2	Our concern would be, however, that the design limits the amount of material that could be delivered, thereby increasing the need for additional HGV movements.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 1: Temporary BLF, no pier - lowest capacity	3.3.19 / 20 / 2	It would preclude any self-discharge vessels from operating.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 2: Temporary BLF, short pier - low capacity	3.3.22 / 23	We agree that the design of Option 2 would increase the ability for larger barges to be accommodated but would still effectively 'cap' the volumes of materials that could be delivered to the SCZ development site by sea, although we are confident that ABP could easily support additional barge deliveries.

Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 2: Temporary BLF, short pier - low capacity	3.3.22 / 23	The proposed 'T shape' at the end of the temporary BLF would enhance discharge from barges but would still be far too limited in our view to take advantage of the full capability of seaborne cargo capacities.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 2: Temporary BLF, short pier - low capacity	3.3.22 / 23	Our concern once again would be, however, that the design limits the amount of material that could be delivered, thereby increasing the need for additional HGV movements.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 2: Temporary BLF, short pier - low capacity	3.3.22 / 23	It would preclude any self-discharge vessels from operating.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.24 / 25	ABP is supportive of the proposed Option 3 for several reasons. <ul style="list-style-type: none"> - The pier would allow more discharges to take place across a wider tidal window. - It would allow a greater amount of material to be discharged simultaneously. - Pier located material handling equipment could also be accommodated and operated, optionally, by experienced ABP stevedores, to increase the discharge volumes - A range of self-discharge vessels could also be accommodated, all of which have very fast discharge capability, allowing for even more material to be delivered by sea, and increasing capacity for additional cargo deliveries within a specific tidal window, thereby reducing HGV movements. (See Fig 3a, section 1 & 2, Vessel C)
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.26	ABP has experience in dealing with both conventional bulk vessels and self-discharging vessels that are discharging cargo, but with varying tidal heights.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.26	We would welcome a further discussion with SCZ development team to further assist in the practical application of our experience to maximise the benefits of the suggested self-elevating platforms that are illustrated in Figure 3.5 'Visualisation of Option 3: Temporary BLF, medium pier – high capacity.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.28	Our own high-level review supports our conclusion that ABP would be able to service a minimum of 400 barge deliveries per year, as this would only equate to some 2 barges per day during the suggested operational 7-month window. (See Fig 3a, section 1 & 2, Vessel A & B)
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.28	Further, the development of this option would facilitate the introduction of high output self-discharge vessels, loaded at either the Port of Ipswich or Lowestoft, for onward seaborne delivery to the SCZ development site. (See Fig 3a, section 1 & 2, Vessel C)
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 3: Temporary BLF, medium pier - high capacity	3.3.28	Both the Ports of Ipswich & Lowestoft have significant land adjacent to operational quays and rail capability, allowing for material to be delivered by rail and sea into a VQ, for onward redelivery by rail, sea and, if deemed necessary, by road. (See Fig 1a & b Ipswich and Fig 2a Lowestoft)
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 4: Temporary BLF, long pier - highest capacity	3.3.29 / 30	ABP is very supportive of the proposed Option 4 for several reasons. <ul style="list-style-type: none"> - The pier would allow more discharges to take place independently of tidal restrictions. - It would allow a greater amount of material to be discharged simultaneously. - Pier located material handling equipment could also be accommodated and operated, optionally, by experienced ABP stevedores, to increase discharge volumes. - A much wider range of self-discharge vessels could also be accommodated due to additional water depth and operate independently of any tidal restrictions. We believe that vessels with the capability of between 4-4250 tonnes could be accommodated. - Both barge and self-discharge vessel payloads could increase. (See Fig 3a, section 1 & 2) - The very fast discharge capability of larger self-discharge vessels could operate, thereby reducing HGV movements further than the other options detailed. (See Fig 3a, section 1 & 2, Vessel C)

Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 4: Temporary BLF, long pier - highest capacity	3.3.31	Our own high-level review supports our conclusion that ABP would be able to service at least 460 barge or self-discharge vessel movements within the currently defined operational window, possibly more.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 4: Temporary BLF, long pier - highest capacity	3.3.31	Additional capacity could be accommodated, subject to a review of weather patterns, outside of this window.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 4: Temporary BLF, long pier - highest capacity	3.3.31	Self-discharge vessels could be accommodated well outside of the defined operational window.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Option 4: Temporary BLF, long pier - highest capacity	3.3.31	We would welcome a further discussion with SCZ development team to further assist in the practical application of our experience to maximise the benefits of the suggested self-elevating platforms that are illustrated in Figure 3.6 Visualisation of Option 4: Temporary BLF, long pier – highest capacity.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Design	3.3.32	ABP is supportive of the suggested temporary conveyor and hopper system proposals.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Design	3.3.32	We have significant experience in operating this type of cargo handling equipment within the ABP group of ports. Figure 3.7 Example of a typical conveyor system for bulk material imports, follows very similar designs across several our ports.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Design	3.3.32	Subject to closer collaboration with the SCZ development team, we believe that the proposed cargo discharge to storage location process is ideal for this project.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Operation	3.3.34	Our cargo handling capabilities and marine operations can support 24 hours reloading at both Lowestoft and Ipswich.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Operation	3.3.35	Our research has identified a range of suitable tugs and flat top barges that can meet the suggested material loads. <i>(See Fig 3 a, section 1 & 2)</i>
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Operation	3.3.35	We believe that the suggested designs in Options 3 & 4 would easily allow both BLF's to accommodate the similar vessel types, with Option 4 giving a wider range of options, including the use of self-discharge vessels.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Operation	3.3.36	Whilst we accept that the current proposed April to October operations window on the temporary BLF may be limited due to poor weather either side of these dates, we believe that further self-discharging vessels could be accommodated thereby extending the campaign period, subject to a more detailed review of sea states and weather patterns, increasing the material volumes delivered by sea, thereby reducing HGV movements.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Construction	3.3.37	ABPmer and UKDredging would be able to provide more technical support in relation to the plough or backhoe dredging that is proposed in this document.

Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Construction	3.3.37	It is of vital importance that safe navigation is maintained throughout the development period.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Construction	3.3.38	· ABP supports the co-development of both BLF's, which in turn will ensure that additional seaborne bulk materials can be delivered as quickly as possible.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Construction	3.3.41	Table 3.6 Summary of temporary BLF options has been reviewed by our operational and marine teams. We agree to the inclusion of the temporary BLF options, but strongly support Options 3 & 4, with Option 4 being our most preferred option, as being the most appropriate way to increase seaborne bulk material delivery and reduce HGV movements during the construction phase.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Common Features: Construction	3.3.41	ABP has identified several operational activities that will support the ambition of delivering over 1.4 million tonnes of material per year and look forward to discussing these in more detail with the SCZ development team.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Why is this change being considered?	3.3.42 / 43	As a major regional stakeholder and significant employer within the region, ABP has been one of several companies that has supported this project and welcomed this latest review. The opportunity that the SCZ development will give to the region as a whole is considerable and is to be supported.
Freight Management Strategy	Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea	Why is this change being considered?	3.3.42 / 43	The importance of developing additional and sustainable transport options is clear. We have already committed substantial time and resources to our deliberations and believe that ABP has the capacity, experience and commitment to help EDF/NNB achieve their goal of more import of material by sea & rail, either directly or via a VQ at an appropriate muster port thereby assisting SCZ in meeting its' stated aim of further minimising impacts on the local environment, by increasing the frequency of freight train movements and utilising both the permanent BLF and developing a new, temporary facility to enable material import by sea.

PHOTO GALLERY



1. Discharge of bulk material from ship to shore using self-discharge type vessel
2. Discharge of bulk material from ship to shore using ABP mobile crane
3. Transfer of bulk material from ship to shore via hopper system

PHOTO GALLERY



- 4. On dock stock management of bulk material
- 5. Handling of bulk material on port using conveyor system



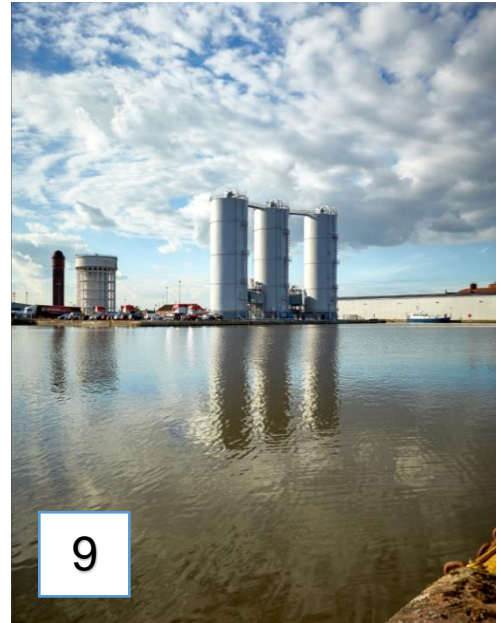
PHOTO GALLERY



- 6. AIL handling from barge to shore
- 7. AIL handling from ship to shore



PHOTO GALLERY



- 8. Typical ABP port covered storage facilities
- 9. Typical ABP port silo systems for bulk storage
- 10. Port and rail links on quayside [illustrative]

Figure 3 a

Section 1

Barge & Self Discharge vessel dimensions used for the purposes of ABP modelling						
Vessel	Max DWT [tons]	Length [m]	Beam [m]	Draft [max,m]	Barge & Self Discharge Vessel dimensions within Ipswich port limitations?	Barge & Self Discharge Vessel dimensions within Ipswich port limitations?
A	3725	95.2	16.5	3.2	Yes	Yes
B	3190	71.4	16.5	3.6	Yes	Yes
C	3450	88.0	12.8	5.5	Yes	Yes

Section 2

Barge/vessel dimensions within Port of Ipswich & Port of Lowestoft & BLF Option limitations						
Vessel	Barge & Self Discharge Vessel dimensions within Ipswich port limitations?	Barge & Self Discharge Vessel dimensions within Lowestoft port limitations?	Barge within BLF Option 1 limitations?	Barge within BLF Option 2 limitations?	Barge within BLF Option 3 limitations?	Barge within BLF Option 4 limitations?
A	Yes	Yes	Yes	Yes	Yes	Yes
B	Yes	Yes	Yes	Yes	Yes	Yes
C	Yes	Yes	No	No	Yes	Yes

Section 3

Distances of BLF from Ports [NM]	
Ipswich	33.5
Lowestoft	20.0

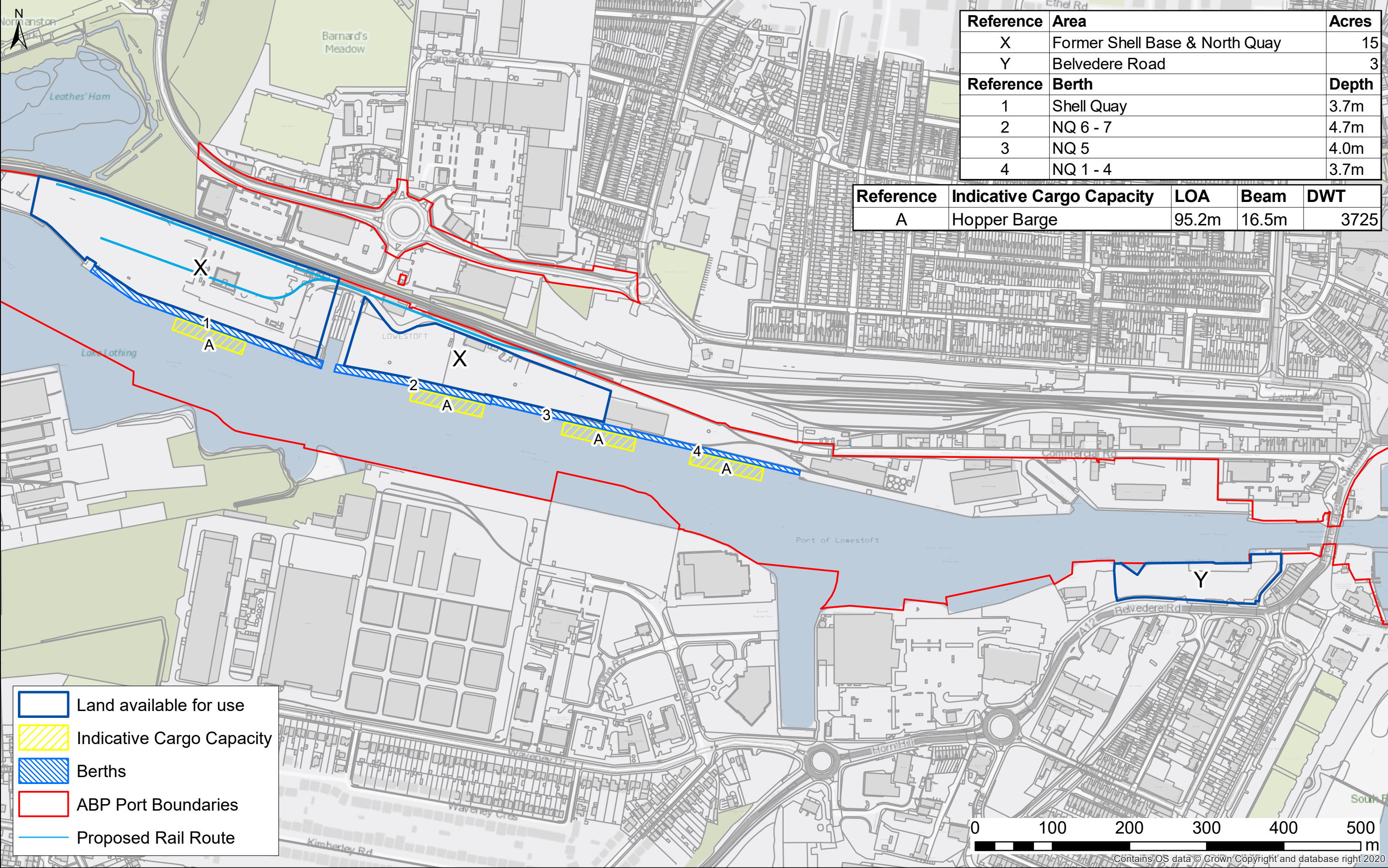
Key to Vessel type
A Dumb Barge
B Dumb Barge
C Self Discharge Vessel

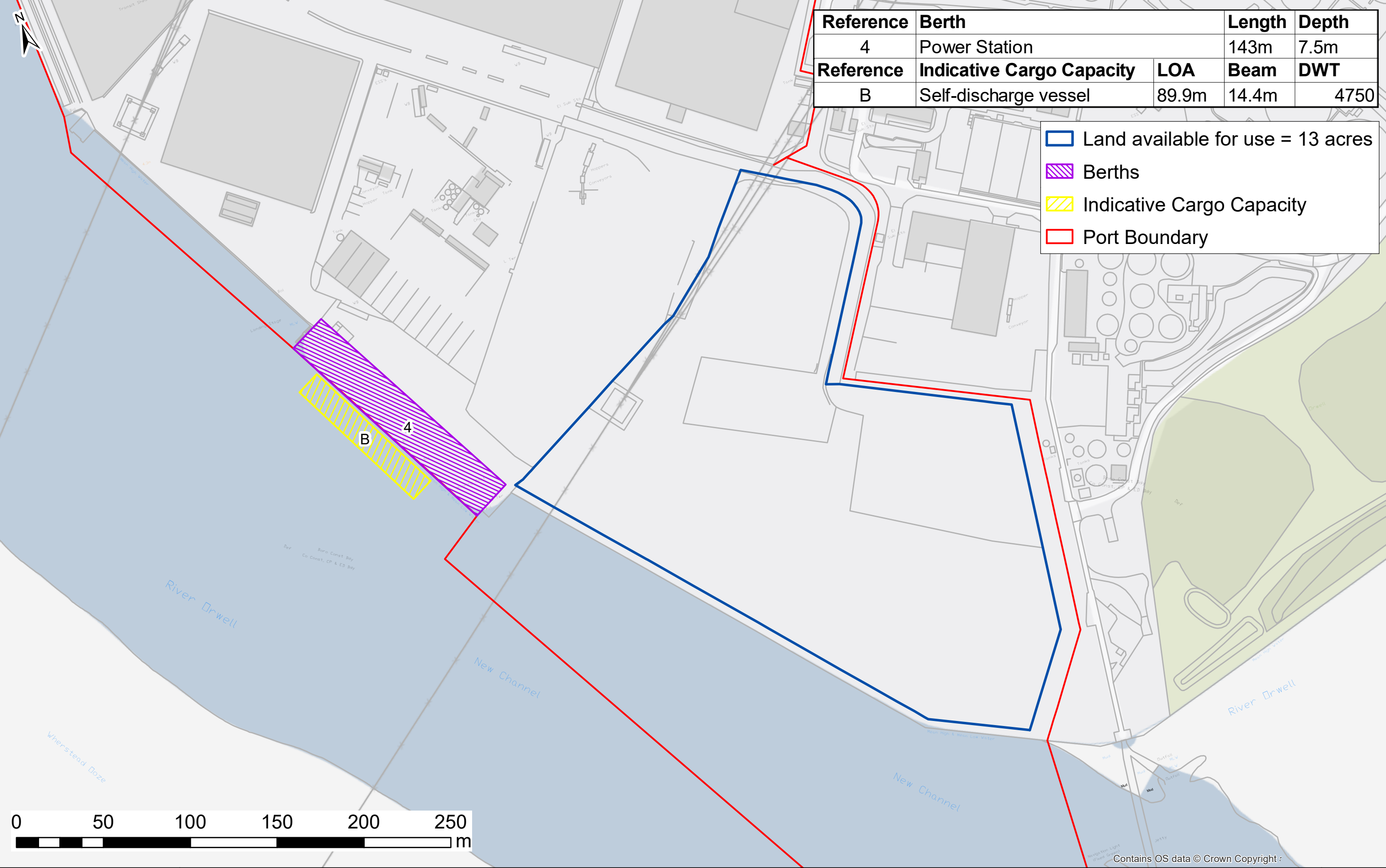
Section 4

Transit times [hrs] to BLF from Ipswich		
Vessel	At 5 knots	At 8 knots
A	8.42	6.12
B	8.42	6.12
C		4.00

Section 5

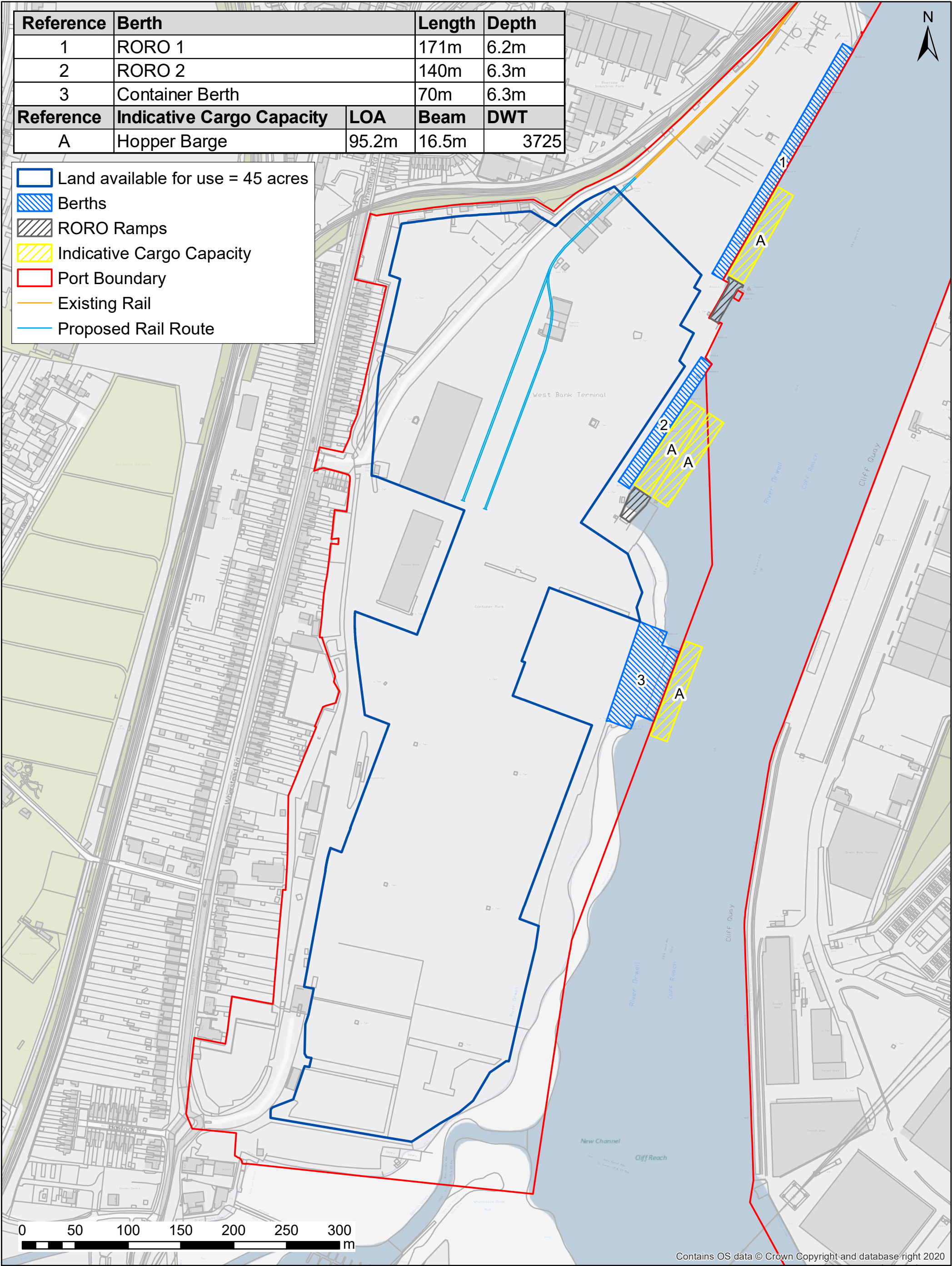
Transit times [hrs] to BLF from Lowestoft		
Vessel	At 5 knots	At 8 knots
A	5.00	3.20
B	5.00	3.20
C		1.50





Reference	Berth		Length	Depth
4	Power Station		143m	7.5m
Reference	Indicative Cargo Capacity	LOA	Beam	DWT
B	Self-discharge vessel	89.9m	14.4m	4750

- Land available for use = 13 acres
- Berths
- Indicative Cargo Capacity
- Port Boundary



The Sizewell C Project

Response to the Consultation on Proposed Changes, November – December 2020

Submission date : 17th December 2020

Foreword

ABP is the UK's leading port operator with a network of 21 ports across Britain.

We handle around one-quarter of the nation's seaborne trade, contributing £7.5 billion to the economy every year and supporting 119,000 jobs. ABP also operates one of the UK's busiest rail terminals at Hams Hall in the Midlands.

With the support of its customers, ABP's ports in East Anglia - Ipswich, Lowestoft & King's Lynn - contribute £360 million to the UK economy every year, supporting 3,700 jobs in the region and 5,300 jobs nationally.

- ABP Ports in East Anglia handle more than 3 million tonnes of cargo every year including a huge amount of bulk construction materials.
- ABP Ports in East Anglia handle over 2 million tonnes of agribulks and 170,000 tonnes of timber annually.
- The Port of Ipswich is the UK's leading export port for agricultural products.

In this context we are responding to this latest Sizewell C Nuclear Power Station (SZC) consultation as the owners and operators of two Suffolk ports, Ipswich & Lowestoft, both of which are ideally located to help support the construction phase of the plant.

Indeed, your latest Consultation on Proposed Changes (CoPC) further underlines the importance of ports in the ongoing development of your freight strategy.

The need for additional carbon zero energy generation is to be applauded, as well as the significant economic benefits to be created during the construction phase and the ongoing positive legacy of nuclear supply chains, employment opportunities and improved educational attainment, particularly with regards to STEM.

Both the ports of Ipswich and Lowestoft are ideally placed to increase the amount of sea and rail delivered cargo to the proposed SZC development site. This also includes enough space for storage and development of aggregate and Abnormal Indivisible Loads [AIL] facilities, as well as capabilities for dealing with a wide range of sea vessels and rail movements.

Whilst your focus is to reduce the amount of road transport and increase rail and sea activity, it is inevitable that HGV's will still be required. The Port of Ipswich is located only 32 miles & the Port of Lowestoft only 26 miles, by road, from the construction site.

Your consultation document provides additional scope for an enhancement of sustainable logistic solutions to facilitate the construction of the Power Station and our response will therefore be focussed on section 3, 'Freight Management Strategy'.

In the meantime, we remain open to continuing dialogue with NNB / SZC and look forward to supporting this project now and in the future.

Yours faithfully



Andrew Harston

Regional Director, Wales & Short Sea Ports

On behalf of Associated British Ports.

Enc

Response

ABP is the UK's leading port operator with a network of 21 ports across Britain.

We handle around one-quarter of the nation's seaborne trade, contributing £7.5 billion to the economy every year and supporting 119,000 jobs. ABP also operates one of the UK's busiest rail terminals at Hams Hall in the Midlands.

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As the two ports of Ipswich & Lowestoft are very near the proposed SZC development site, we are keen to establish our clear abilities to address and support several specific points highlighted below from your recent CoPC which we consider would enable SZC to meet the stated objective to '*further minimise the impacts on the local area and environment*', in particular using maritime transport options and rail to reduce the impact of HGV movements.

Whilst we anticipate that some capital investment will be required to facilitate the proposed growth in rail and additional cargo handling to and from vessels, this is a relatively straightforward investment and development project for ABP.

The CoPC has been reviewed in detail and we have identified areas where we believe we can further support SZC's ambition to deliver the project. Therefore, our response addresses various section numbers in turn, as shown within the CoPC document, for ease of reference:

Section 3.1.2 whereby SZC consider:

- Potential changes to rail movements from those in the original application.
- Potential enhancements to the permanent Beach Landing Facility (BLF) and options for a second temporary BLF to facilitate materials import by sea.

Section 3.1.4

- The development of a suitable BLF fits directly with our seaborne capabilities.
- The requirement for a minimum of 2 trains per day in the early year's construction fits directly with both ports on dock rail facilities.

Section 3.1.8

- We support the work of your contractor and transport logistics teams in further developing the strategy for SZC construction materials. Sourcing aggregates from sources that are rail or sea connected fits with our existing mature port operations within East Anglia.

Section 3.1.9

- The potential to operate 5 trains per day for a short period could be accommodated within the Port of Ipswich, subject to additional capital investment for track extensions into larger areas of the existing port estate and appropriate, critical, rail paths being provided by Network Rail (NR). (See *Fig 1a, proposed rail route Ipswich*)
- The Port of Lowestoft also has capacity for additional train services, subject to additional but limited capital investment for track extensions into the port estate. (See *Fig 2a Lowestoft, ref X & proposed rail route*)
- The proposed enhancements of both the BLF and temporary BLF, particularly with regards to option 3 & 4 would see an increased capability of seaborne freight to the construction site, to which ABP can provide more than enough resource to maximise the cargo volumes by sea.

Section 3.1.11

- Sustainability is a key part of ABP operations and future developments. We applaud the additional focus in the CoPC on sustainability and the desire to move more material to and from SZC by rail and sea.
- If the necessity for HGV road movements remain, even at the much lower suggested level of 40% of total traffic, the Port of Ipswich is only 5 minutes from the A14 junction, 32 miles / 53 minutes from SZC, with the Port of Lowestoft even closer and immediately adjacent to the A12, only 26 miles / 45 minutes from SZC.
- The new Gullwing Bridge being built in Lowestoft will also adjust the traffic flow, facilitating smoother access from the port estate to the A12, potentially reducing journey times further and improving connectivity from the north side of Lake Lothing to the south and SZC without the disruption that is currently experienced with the low level bascule bridge.

Section 3.1.12

- ABP stands ready to support the ambition of moving more bulk materials by rail or sea rather than HGV.
- Table 3.1 Preferred modal split for material transport, aligns with our work on developing a material storage and handling capability at both ports, using the already established rail, sea and land connections.

Section 3.1.13

- As addressed earlier, whilst a significant volume of material will still have to be moved by road, both the Ports of Ipswich and Lowestoft are within 32 miles / 53 minutes journey time by road from the SZC development site.
- Both ports have readily available road access to main routes, with enough staging areas for a significant number of HGV's to be held within our port estates. (*See Fig 1a & b Ipswich and 2a Lowestoft, ref X & Y*)

Section 3.1.14

- ABP believe that with further engagement and planning, rail and sea supply routes could increase more than the assumed percentages within those shown in your Table 3.1 'Preferred modal split of material transport'. Our own review suggests that a great deal of volumes suitable for these types of modality can be accommodated within our two ports for onward seaborne and rail deliveries. (*See Fig 1 a & b, Fig 2 a and Fig 3 a, section 1 & 2*)
- The 40% suggested for HGV movements can also be easily accommodated within both ports. We have enough room within our port estates and easily accessible main road connections. (*See Fig 1a & b Ipswich and Fig 2a Lowestoft, ref X & Y*)

Section 3.1.16

- We stand ready to support further consultations with SZC and their chosen supply chain partners to increase the rail and sea transportation movements.

3.2 Increase in the frequency of freight train movements to facilitate bulk material imports by rail.

Section 3.2.1

- As detailed within this section, it is suggested that two freight trains per day, operating from the East Suffolk line is likely within the early years. Both the Port of Ipswich and Lowestoft can accommodate this requirement and have potential to increase train movements with relatively straightforward and modest investments, subject to NR providing enough rail paths.
- Efficiency can be generated by providing additional rail sidings on our port's estates, to pre-load freight wagons well ahead of required onward delivery from both ports. (See *Fig 1a Proposed Rail Route, Ipswich* and *Fig 2a Lowestoft, ref X, proposed rail route*)

Section 3.2.2

- We are fully supportive of the green rail route as detailed.
- As previously detailed, we believe the additional efficiencies available for holding wagons ready for collection during the evening at both ports is available.

Section 3.2.5

- The suggested train layouts and wagon lengths are well within both ports' capabilities, subject to minimal capital investment for track extension within the port estate.
- We believe that further engagement with SZC, could see the possibility for longer trains and greater tonnages per train from the assumed 1,250 tonnes currently suggested. (See *Fig 1a, proposed rail route, Ipswich* and *Fig 2a Lowestoft, ref X, proposed rail route*)

Section 3.2.6

- Subject to appropriate consultation and engagement we are fully supportive of development of rail capacity as detailed in Table 3.2 'Number of trains per day over the construction period', both in terms of the number of trains operating and the amount of tonnage that could be transported.
- Our only caveat to this would be the ability of NR to provide additional rail paths at operating times suitable for material delivery.

Section 3.2.9

- We support that the potential is being investigated to operate additional train services to move bulk material to the SZC development site. ABP is keen to establish closer collaboration to establish what rail layout at our ports would most suit the increase in rail movements, which in turn would also drive significant efficiencies. (See Fig 1a, proposed rail route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)
- Further we are confident that the suggested train layouts and wagon lengths are well within both ports' capabilities and if an opportunity arose to allow them to be larger, subject to appropriate signalling on the designated rail routes, we would be able to adapt our port track layout accordingly subject to consultation.

Section 3.2.13

- Whilst we understand that the current payload is limited to some 1,250 tonnes per train, our own data suggests the potential for higher tonnage volumes could exist. which could be achieved with the appropriate loading equipment, enough sidings space at the receiving rail sidings, appropriate signalling and enough storage space within the Virtual Quarry (VQ) located at either port. (See Fig 1a, proposed rail route, Ipswich and Fig 2a Lowestoft, ref X, proposed rail route)

c) Potential for HGV reductions

i. Potential for HGV reductions from additional rail movements.

- The stated aim of using standard HGV aggregate lorries, subject to more detail on material density, could see a 10-20% increase in tonnage per road movement, particularly for cementitious bulk material, which would reduce the number of HGV moves required by a similar proportion which of itself is not insignificant.
- This improved tonnage per HGV could be achieved by a rigorous loading process, with suitable equipment such as front-loading shovels with weigh cells and camera technology, allowing the operator to achieve better loads, or development of specific loading hopper technology which allowed the operator to 'trim' the load to a pre-determined optimum. In turn this would give a very accurate load per truck combined with integrated weighbridge technology allowing for maximum legal capacities to be achieved, subject to suitable investment at either of our two ports.

Section 3.2.14

- We agree on the logical assumption that by maximising each train movement tonnage, up from the assumed 1,250 tonnes per train, will result in a reduction of HGV deliveries as described.
- Further, given ABP's experience of aggregate trains regularly leaving the Port of Ipswich already at some 1,560 tonnes laden cargo weight, the additional 310 tonnes per train would, assuming only 18.5 tonnes per HGV, lead to a further reduction of some 16.7 trucks per day (33.5 HGV's both ways) for each train operating. So, 33.5 two-way HGV trips removed for one train, 67 for two trains and in the case of five trains per day, a reduction of 167.5 two-way HGV trips per day removed from Suffolk roads through maximising rail loading capability. (See *Fig 1a, Ipswich*)
- Our own data in terms of HGV loading activities in ABP ports suggests that for cementitious material movements, the tonnage could be increased to closer to 26 tonnes per HGV from the 18.5 tonne figure used in the CoPC, thereby further decreasing the overall road miles across the development project. This increase in payload experienced could represent up to a 40% reduction in HGV moves, again by focussing on the optimising of loading.

Section 3.2.16

- It is certainly possible for vessel loading operations to take place 6 or 7 days per week at both ports', thereby increasing the likelihood of additional train services and, therefore, a corresponding reduction in HGV movements. Additional rail path capacity could be obtained on weekends.

ii. Potential for HGV reductions from an increase in the transport of materials by sea.

Section 3.2.19

- ABP is the UK's largest port operator, with 21 ports and with the UK's largest inland rail terminal. We have substantial and proven experience in the discharge, loading, storing and management of aggregate materials.
- We fully support the development of additional BLF capacity at the SZC development site. Our experience in moving vast amounts of material from rail, to shore to ship and vice versa gives us a high level of confidence that additional volumes to be moved via sea can be most definitely accommodated.

- Both ports can operate 24 hours per day, are not 'locked', thereby relatively unlimited in vessel activity in relation to tidal changes which take place throughout the year, further increasing the seaborne cargo opportunity.

Section 3.2.21

- ABP Mer, our in-house marine consultancy have detailed information relating to weather and marine patterns on the East Suffolk coast.
- It is likely that only minimal disruption to material delivered by sea will occur during the April – October operational window. Even with the average disruption identified, we are confident on our ability to handle enough vessels to provide material in greater volumes than the CoPC requires.
- The benign harbour areas for both ports leads to the safe expansion of marine activity, not only during the 'campaign' periods between April and October, but potentially at other times. As stated, the longer the seaborne material supply can be maintained, the lower the overall HGV requirement will become.

Section 3.2.22

- Whilst we accept that it is difficult to present a definitive picture of how the different options would impact on HGV movements, we are committed to working closely with SZC to present additional seaborne options, including but not limited to barge and self-discharge vessels, possibly operating outside of the proposed 'Campaign' periods.
- The ability to store considerable amounts of material at either of our ports, all of which have trimodal capability, i.e. sea, rail and road access and providing both VQ and logistics buffering facilities is substantial. With over 64 acres of land in Ipswich and some 15 acres of land in Lowestoft, various options for intermediate storage, including bulk powders, exists or can be readily developed. (See *Fig 1a & b Ipswich, ref Indicative Cargo Capacity & Berths 1,2 &3 and Fig 2a Lowestoft, ref 1,2,3&4*)
- Pre-cast concrete tunnel segment production can also be accommodated at both ports and, of course, with 3 modes of onward transport available, providing tremendous flexibility and resilience. (See *Fig 1a Ipswich*)

Section 3.2.23

- We are supportive of the flexible transport strategy balanced against acceptable environmental considerations.
- Our own calculations support SZC's ambition to reduce HGV movements to around 40% of the predicated volumes and, subject to increasing projected tonnage to both vessels, rail deliveries and HGV's, reduce the overall number of material movements required.

Section 3.2.24

- The ability of both ports to provide adequate land to develop VQ's is clear ahead of the proposed 2025 start date. This would help ensure a steady flow of material to the development sites during 2025-2027. (See Fig 1a, ref Land available for use and Fig 2a, ref X & Y)
- We would welcome further engagement on the inbound logistics for 'fill and cementitious material', Cementitious material is suitable for inbound train movements whilst fill material is more easily capable of being moved by sea, rather than road or rail., potentially helping to provide enough outbound rail capacity from the VQ to the SZC development site.

Section 3.2.25

- A deeper rail and seaborne technical review would in turn would help support the data provided in Table 3.4 'Potential peak HGV numbers with rail and BLF enhancements'.
- Our data suggests higher load factors can be achieved.

Section 3.2.26

- Subject to NR rail path availability, both our ports can operate 6/7 days a week, thereby adding an additional day per week for material flows to and from the site.

Section 3.2.27

- ABP agrees that the increased rail and marine options will reduce HGV numbers significantly.
- Further material could be supplied to the VQ by both rail and sea, thereby reducing distant HGV inbound requirements.

Section 3.2.29

- ABP believes that our experience in marine matters and bulk material handling can be utilised to reduce, as much as possible, the indicative HGV movements on local roads. This would include options to increase the tonnes carried by vehicles specifically dealing with cementitious materials, above the current proposed 18.5 tonne average detailed within the CoPC.

Section 3.2.30

- It is critical to develop, in our view, the additional temporary BLF, planned to be in place for 2027/28, to enable maritime delivery of seaborne materials to the SZC development site, in turn reducing the HGV volumes.
- As stated, after 2027/28 we understand that the main bulk materials will be aggregates for concrete. Whilst accepting that most of this material could be delivered by train, alternative sources for coastwise marine deliveries of material could take place, either via the VQ for stock holding and onward transit, or direct to the BLF during the main civils phase for 2030 and beyond.

3.3 Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea.

Section 3.3.1

- We are supportive of the enhancement of the proposed BLF and agree that it could be utilised for both construction materials and Abnormal Indivisible Loads (AILs), delivered by barges from a muster port, subject to final design.

Section 3.3.2

- We have carried out a detailed review of our capabilities to support significant barge movements from both ports, which would act as the transshipment staging points or Logistics Transfer Facilities (LTF) serving the VQ. (See *Fig 1a & b Ipswich, ref Berths 1,2 & 3 & 4 & Indicative Cargo Capacity and Fig 2a Lowestoft, ref 1,2,3 & 4*)
- Further we have in-house property development capability to provide covered storage for the high levels of assumed AILs.

- Additional reviews of local weather patterns may lead to wider operational windows for both barge and self-discharge vessel activity outside of the proposed campaign periods. (See Fig 3a, section 1 & 2)

Section 3.3.5

- ABP has the capability with inhouse partners, such as ABP Mer and UKDredging to provide support with consultancy services to assist SZC in better understanding the requirements for surveying and reprofiling the seabed in the circumstances as described.

Section 3.3.6

- We are supportive of the proposed demounting of the platform deck, as per Figure 3.2 'Typical visualisation of permanent BLF during the operational phase', but assuming that it could still be utilised for a wider operational window, subject to weather conditions.

b) Description of the potential changes

Section 3.3.9

- We are supportive of the outline designs to enhance the permanent BLF and for the provision of a new temporary BLF as detailed within the CoPC.
- The proposed revisions facilitate an increase in material delivered by sea, including bulk and AILs.

1. Enhancing the design of the permanent BLF

Section 3.3.10

- We support, subject to appropriate environmental review, the development of a larger, permanent BLF. Our ports can store AILs as well as facilitating their onward delivery by sea via our Port of Ipswich existing Ro-Ro ramps. (See Fig 1a Ipswich, ref 1,2 & 3 Ro-Ro)
- Further, the Port of Lowestoft has an available storage area which has historically been used for the inbound delivery by sea, storage and then road delivery of heavy equipment to the Sizewell site. (see Fig 2a, Lowestoft, ref Y)

Section 3.3.13

- Our own calculations for vessel movements during the suggested campaign periods support the need for this enhanced BLF design to increase additional bulk materials delivered by sea which in turn will reduce the amount of HGV's utilised during the construction phase.
- The proposed volume of 100 vessel movements per annum can easily be accommodated from our ports, however any capacity constraints in the ability of the BLF to receive bulk materials would be counterproductive.
- Further clarity on the types of material handling equipment at the BLF is important, but we would suggest a combination of excavator equipment on barges as well as a suitable conveyor located directly onto the BLF. Clarification on whether it is intended that this mechanical handling capability will be provided at, or on the BLF would be useful.

ii. Providing a new temporary BLF

Section 3.3.15

- The addition of a temporary BLF is supported by ABP, as this will facilitate a greater level of material to be delivered by sea during the construction period. However, this must be a robust development, capable of handling a high volume of seaborne cargo over the life of the project.
- Whilst the permanent BLF can accommodate both AILs and bulk material, the additional BLF should ensure that any capacity constraints or short-term delays in the ability of the permanent BLF to receive materials, would be significantly mitigated.

Section 3.3.16

- Whilst we accept that the temporary BLF could be in place for the short term, 2027/28, we support the suggestion to extend its operational life to facilitate additional material supply by sea, both in terms of reducing HGV movements, but to accommodate flexibility in terms of any unforeseen changes in the construction time line.

Section 3.3.17

- ABP has carried out a high-level review of the four suggested options. Whilst we can support Options 1 & 2, we have spent time further evaluating the developments of Option 3 & 4 and believe they provide a major improvement to the initial proposals.

- We are confident, subject to a range of investments related to handling equipment at both our ports, that we can accommodate the suggested volumes of material storage and onward delivery by sea for all 4 options but have the potential capacity to handle more material if required, exceeding the 1.4 million tonnes suggested.
- The annual material volumes could be accommodated in full at Ipswich or split across both Ipswich and Lowestoft, if preferred. Our loading and ship handling capacity can accommodate much higher levels of seaborne cargo if required.

Option 1 = 70 barge deliveries per annum, 200kt of bulk per annum

Option 2 = 100 barge deliveries per annum, >200kt of bulk per annum

Option 3 = 400 barge deliveries per annum, +/- 1.4 million tonnes per annum

Option 4 = 460 barge deliveries per annum, > 1.4 million tonnes per annum

Section 3.3.18

- ABP support the principle of two separate BLF operations, thereby mitigating any construction delay caused by congestion with a single BLF.
- Simultaneous use of both BLF's will facilitate the discharge of bulk materials and AILs, thereby increasing the capacity and opportunity of materials to be delivered by sea.

Option 1: Temporary BLF, no pier - lowest capacity

Section 3.3.19/20/21

- We agree that the design of Option 1 would limit the delivery of material to the SZC development site, although we are confident that ABP could easily support additional barge deliveries.
- Our concern would be, however, that the design limits the amount of material that could be delivered, thereby increasing the need for additional HGV movements.
- It would preclude any self-discharge vessels from operating.

Option 2: Temporary BLF, short pier – low capacity

Section 3.3.22/23

- We agree that the design of Option 2 would increase the ability for larger barges to be accommodated but would still effectively ‘cap’ the volumes of materials that could be delivered to the SZC development site by sea, although we are confident that ABP could easily support additional barge deliveries.
- The proposed ‘T shape’ at the end of the temporary BLF would enhance discharge from barges but would still be far too limited in our view to take advantage of the full capability of seaborne cargo capacities.
- Our concern once again would be, however, that the design limits the amount of material that could be delivered, thereby increasing the need for additional HGV movements.
- It would preclude any self-discharge vessels from operating.

Option 3: Temporary BLF, medium pier – high capacity

Section 3.3.24/25

- ABP is supportive of the proposed Option 3 for several reasons.
 - The pier would allow more discharges to take place across a wider tidal window.
 - It would allow a greater amount of material to be discharged simultaneously.
 - Pier located material handling equipment could also be accommodated and operated, optionally, by experienced ABP stevedores, to increase the discharge volumes.
 - A range of self-discharge vessels could also be accommodated, all of which have very fast discharge capability, allowing for even more material to be delivered by sea, and increasing capacity for additional cargo deliveries within a specific tidal window, thereby reducing HGV movements. (*See Fig 3a, section 1 & 2, Vessel C*)

Section 3.3.26

- ABP has experience in dealing with both conventional bulk vessels and self-discharging vessels that are discharging cargo, but with varying tidal heights.

- We would welcome a further discussion with SZC development team to further assist in the practical application of our experience to maximise the benefits of the suggested self-elevating platforms that are illustrated in Figure 3.5 'Visualisation of Option 3: Temporary BLF, medium pier – high capacity.

Section 3.3.28

- Our own high-level review supports our conclusion that ABP would be able to service a minimum of 400 barge deliveries per year, as this would only equate to some 2 barges per day during the suggested operational 7-month window. *(See Fig 3a, section 1 & 2, Vessel A & B)*
- Further, the development of this option would facilitate the introduction of high output self-discharge vessels, loaded at either the Port of Ipswich or Lowestoft, for onward seaborne delivery to the SZC development site. *(See Fig 3a, section 1 & 2, Vessel C)*
- Both the Ports of Ipswich & Lowestoft have significant land adjacent to operational quays and rail capability, allowing for material to be delivered by rail and sea into a VQ, for onward redelivery by rail, sea and, if deemed necessary, by road. *(See Fig 1a & b Ipswich and Fig 2a Lowestoft)*

Option 4: Temporary BLF, long pier – highest capacity

Section 3.3.29/30

- ABP is very supportive of the proposed Option 4 for several reasons.
 - The pier would allow more discharges to take place independently of tidal restrictions.
 - It would allow a greater amount of material to be discharged simultaneously.
 - Pier located material handling equipment could also be accommodated and operated, optionally, by experienced ABP stevedores, to increase discharge volumes.
 - A much wider range of self-discharge vessels could also be accommodated due to additional water depth and operate independently of any tidal restrictions. We believe that vessels with the capability of between 4-4250 tonnes could be accommodated.
 - Both barge and self-discharge vessel payloads could increase. *(See Fig 3a, section 1 & 2)*
 - The very fast discharge capability of larger self-discharge vessels could operate, thereby reducing HGV movements further than the other options detailed. *(See Fig 3a, section 1 & 2, Vessel C)*

Section 3.3.31

- Our own high-level review supports our conclusion that ABP would be able to service at least 460 barge or self-discharge vessel movements within the currently defined operational window, possibly more.
- Additional capacity could be accommodated, subject to a review of weather patterns, outside of this window.
- Self-discharge vessels could be accommodated well outside of the defined operational window.
- We would welcome a further discussion with SZC development team to further assist in the practical application of our experience to maximise the benefits of the suggested self-elevating platforms that are illustrated in Figure 3.6 Visualisation of Option 4: Temporary BLF, long pier – highest capacity.

iii. Common features

Design

Section 3.3.32

- ABP is supportive of the suggested temporary conveyor and hopper system proposals.
- We have significant experience in operating this type of cargo handling equipment within the ABP group of ports. Figure 3.7 Example of a typical conveyor system for bulk material imports, follows very similar designs across several our ports.
- Subject to closer collaboration with the SZC development team, we believe that the proposed cargo discharge to storage location process is ideal for this project.

Operation

Section 3.3.34

- Our cargo handling capabilities and marine operations can support 24 hours reloading at both Lowestoft and Ipswich.

Section 3.3.35

- Our research has identified a range of suitable tugs and flat top barges that can meet the suggested material loads. (*See Fig 3 a, section 1 & 2*)
- We believe that the suggested designs in Options 3 & 4 would easily allow both BLF's to accommodate the similar vessel types, with Option 4 giving a wider range of options, including the use of self-discharge vessels.

Section 3.3.36

- Whilst we accept that the current proposed April to October operations window on the temporary BLF may be limited due to poor weather either side of these dates, we believe that further self-discharging vessels could be accommodated thereby extending the campaign period, subject to a more detailed review of sea states and weather patterns, increasing the material volumes delivered by sea, thereby reducing HGV movements.

Construction

Section 3.3.37

- ABP Mer and UKDredging would be able to provide more technical support in relation to the plough or backhoe dredging that is proposed in this document.
- It is of vital importance that safe navigation is maintained throughout the development period.

Section 3.3.38

- ABP supports the co-development of both BLF's, which in turn will ensure that additional seaborne bulk materials can be delivered as quickly as possible.

Section 3.3.41

- Table 3.6 Summary of temporary BLF options has been reviewed by our operational and marine teams. We agree to the inclusion of the temporary BLF options, but strongly support Options 3 & 4, with Option 4 being our most preferred option, as being the most appropriate way to increase seaborne bulk material delivery and reduce HGV movements during the construction phase.
- ABP has identified several operational activities that will support the ambition of delivering over 1.4 million tonnes of material per year and look forward to discussing these in more detail with the SZC development team.

c) Why is this change being considered?

Section 3.3.42/.43

- As a major regional stakeholder and significant employer within the region, ABP has been one of several companies that has supported this project and welcomed this latest review. The opportunity that the SZC development will give to the region is considerable and is to be supported.
- The importance of developing additional and sustainable transport options is clear. We have already committed substantial time and resources to our deliberations and believe that ABP has the capacity, experience and commitment to help EDF/NNB achieve their goal of more import of material by sea & rail, either directly or via a VQ at an appropriate muster port thereby assisting SZC in meeting its' stated aim of further minimising impacts on the local environment, by increasing the frequency of freight train movements and utilising both the permanent BLF and developing a new, temporary facility to enable material import by sea.

In Summary

ABP has substantial and proven experience in the discharge, loading, storing and management of aggregate and other construction materials by sea, rail and road.

Safety and sustainability are a major part of our company's ethos and we look forward to playing our part in the development of the new SZC Nuclear Power Plant.

To assist in the reduction of HGV road journeys it is critical that the development of the temporary BLF Options' 3 & 4, with Option 4 being our strong preference is progressed. In our view it is the only way to ensure a robust, flexible and resilient way of addressing the requirement to reduce material movements by road.

The Ports of Ipswich and Lowestoft are ideally located to support the SZC development. Our marine and operational teams have reviewed the detail within the CoPC and have concluded we can assist in meeting the ambition of a more sustainable supply chain solution by developing a greater level of vessel and rail activity and increasing the loads that they will transport.

Our focus on ensuring each vessel, train or HGV is loaded to the maximum safe and legal limit, will also ensure a reduction in the overall volume of movements required to deliver the project.

We look forward to supporting SZC in their future developments.

LIST OF ADDENDUMS

FIGURE 1A	Ipswich port - West Bank
FIGURE 1B	Ipswich port - Cliff Quay
FIGURE 2A	Lowestoft port
FIGURE 3A	Marine related information sheet
FIGURE 4A	Photo gallery
FIGURE 5A	ABP Sizewell C consultation comments

From: [REDACTED]@addleshawgoddard.com
Sent: 18/12/2020 16:56:31
To: sizewell@edfconsultation.info
CC: [REDACTED]@addleshawgoddard.com
Subject: Sizewell C Project - Consultation Response - Network Rail Infrastructure Limited [ADDGDD-LIVE.FID3214222]
Body:

Dear Sirs

I write on behalf of my client Network Rail Infrastructure Limited in relation to the Consultation on Proposed Changes to the Sizewell C Project.

Please see below Network Rail's response to the consultation:

"Network Rail does not object to the Order or the changes proposed in this consultation in principle. However, the impacts of the proposals and how these impacts may be mitigated is the subject of further engagement and assessment with EDF. For this purpose, Network Rail and EDF have an agreement in place for joint working and have recently formed a joint Project Board to work through the detail of the issues raised.

Notwithstanding this, introducing an increased number of Freight Trains on the East Suffolk line will (due to their slower running speeds) have potential implications for capacity and operations on the line and addressing these needs further collaboration and consideration.

Therefore, Network Rail cannot fully endorse the project and must object to the inclusion of the proposed amendments in the Order and to Compulsory Powers being granted in respect of them."

I would be grateful if you could please confirm that this submission has been received.

Kind regards

Charlotte

Charlotte Jones
Associate

Addleshaw Goddard LLP

Date: 18 December 2020
Our ref: 335391



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Carly Vince
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BY EMAIL ONLY

Dear Ms Vince

Sizewell C Consultation on Proposed Changes (November – December 2020)

Thank you for seeking our advice on the above in your consultation dated 18 November 2020 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.

You will be aware that we recently submitted our Relevant Representations in response to the Sizewell C Project Development Consent Order (DCO) application within which we raised a number of outstanding concerns in the context of our remit. We have therefore advised the Planning Inspectorate that, in our view, these must be resolved before the proposed project can be consented.

As outlined in that response, we consider that a significant amount of information was missing from the original application which, in many instances, did not allow us to properly advise on the potential impacts from the proposals on the interests within our remit, including:

- Internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites);
- Nationally designated sites (Sites of Special Scientific Interest (SSSIs));
- Protected species;
- Protected landscapes (Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB));
- Ancient woodland;
- The England Coast Path (ECP).

Some of the matters for which further information and assessment is required are significant enough, in our opinion, to mean that if they are not satisfactorily addressed Natural England would be forced to advise that it would not be lawful to permit the project as currently proposed.

We note with concern that the recent *Notification of Proposed Project Changes* document (EDF Energy, dated October 2020) states that *EDF Energy* “intends to submit revised information prior to

the start of the examination to address minor errata, omissions and qualitative issues relating to the submitted application documentation, although these will not form part of the consultation" (paragraph 1.1.5). Section 6 lists further information that is proposed to be submitted, relating to the proposed changes and to pre-existing elements of the Project, including information identified as missing within our Relevant Representations. In terms of our remit, the missing information includes a number of key surveys and technical reports which feed into and underpin the various impact assessments (e.g. Habitats Regulations Assessment (HRA)), plus plans and strategies (e.g. Outline Landscape and Ecology Management Plan (OLEMP), fen meadow and wet woodland strategies etc.) which include the detail of mitigation and compensation measures identified as necessary through the corresponding impact assessments.

Many of these outstanding surveys, technical reports, impact assessments, plans and strategies are directly relevant to our statutory remit and outstanding concerns, and need to be reviewed by us in detail in order for us to properly advise the Examining Authority on them when submitted. For these reasons, we consider some of these to be major omissions. We note that the words used at paragraph 1.1.5 of your Notification of Proposed Project Changes are taken from paragraph 2.2 of PINS advice note sixteen and, with respect, cannot agree that the further information that we require amounts merely to the correction of errata or minor omissions. It is more important than that and hinders our ability to provide sufficiently complete and robust advice to the Examining Authority.

In addition to those omissions from the application as submitted in May 2020, this current consultation includes a number of material changes to the application as originally submitted, albeit we readily accept that these material changes are within the substance of what was originally applied for. Many of these are also relevant to the interests within our statutory remit and so also need to be reviewed by us in detail in terms of the corresponding impact assessments, underpinning surveys, technical reports, mitigation strategies etc. Some of these appear to be in response to our outstanding concerns and represent progress that we very much welcome (e.g. change to the SSSI crossing design, change to the location of the Water Resource Storage Area, additional SSSI fen meadow compensation site, change to Sizewell B relocated facilities proposals etc.). Others present us with additional and/or alternative issues to consider rather than remove or lessen the concerns outlined in our Relevant Representations (e.g. additional Beach Landing Facility (BLF), change to transport delivery strategy, change to sea defence design, new temporary marine outfall etc.). Some of these changes may therefore present a challenge in our efforts to achieve common ground until they have been properly assessed with sufficient information and time. We therefore stress that while we do not object to the changes to the Project as proposed through this consultation, we do have concerns about timescales and workload, and subsequently the ability of our organisation to provide the most helpful advice to the Examining Authority.

As you are aware, we are also concurrently engaged in a number of issue specific meetings which EDF Energy have facilitated since the submission of our Relevant Representations, with the aim of progressing some of our key outstanding concerns. Again, we welcome this and remain committed to working with you to resolve and reach common ground on as many of these as possible over the coming months.

On this basis, we advise that it will be very challenging for us to process and advise on all the new information which we understand is to be formally submitted by EDF Energy to the Planning Inspectorate in January 2021 through the Proposed Project Changes submission and more widely as outlined above, and informally to us through the ongoing meeting schedule. As it stands, we are therefore not confident that we can resource this input in terms of time and available expertise if, as we understand it, the Examination is due to start in early 2021. This is in the context of the current availability of our national specialists, many of whom are, in parallel, advising on Hinkley Point C and Bradwell B (both EDF Energy projects) and a number of other major projects throughout England, as well as our wider staff resource which continues to be affected by the coronavirus pandemic.

Nevertheless, we include our advice and comments in relation to the above consultation within **Annex I** below.

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.

Please note that we reserve the right to show a copy of this letter, and subsequent correspondence, to PINS, in order that they may be aware of our concerns.

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.

Yours sincerely

Natural England
18 December 2020

Annex I: Natural England's advice on the Sizewell C Consultation on Proposed Changes (November – December 2020)

Section 1

- 1.1.4. Natural England has advised EDF Energy extensively on the Sizewell C Project throughout the pre-application period between 2012 and 2019 and we welcome that some of this advice was carried through into the application as submitted in May 2020. However, it should be noted that many of the key outstanding issues in the context of our remit were unresolved at the time of submission, as summarised in our Relevant Representations.
- 1.1.5. Nevertheless, we welcome EDF Energy's continued engagement with us during the pre-examination period and, remain committed to advising EDF Energy to resolve and reach common ground on as many issues as possible over the coming months. That includes through the current consultation and through the various issue-specific meetings that EDF Energy have scheduled with us since the submission of our Relevant Representations. We will do our best within the challenging timescale to help progress and resolve outstanding issues in order to reduce the likelihood of them remaining outstanding going into the examination period, which could hinder the Planning Inspectorate's ability to determine the natural environment aspects of the application with confidence.
- 1.1.6. As highlighted in our Relevant Representations (Part I, paragraph 2.11.2, page 22 and Part II, Natural England key issue reference 23, page 71-74), Natural England has consistently encouraged EDF Energy, given the scale and location of the proposed Project surrounded by multiple designated wildlife sites within the Suffolk Coast and Heaths AONB, that it should contribute to creating a true, long-term, landscape-scale environmental legacy both within the red line boundary and more widely. This should complement, and not be a substitute for the need to mitigate, and compensate where necessary impacts on statutory sites and species. We very much welcome the ambition in this paragraph to manage the land within EDF Energy's Sizewell Estate for potential rewilding and ambitious environmental gain post-construction, and also the wider ambition to expand and connect parcels of land beyond the estate. In terms of the latter, we would welcome further discussions on the best mechanisms to facilitate this, whether it be through establishing an independent environmental Trust or building on existing nature conservation partnerships in the area. Whatever the mechanism, we consider that this could make a major contribution to the forthcoming national Nature Recovery Network in the area in line with the Lawton principles¹ and the ambitions within the government's 25 Year Environment Plan². It could and should be something exemplary that properly reflects a development of this magnitude and projected lifespan within the AONB, as part of a wider potential Suffolk Coast Nature Recovery Area. It should be noted that this is separate and additional to the requirement for the proposed development to avoid, mitigate and/or compensate for impacts on existing areas of high environmental value (e.g. SACs, SPAs, Ramsar sites, SSSIs, AONB, protected species, ancient woodland, priority habitats and species etc.) which are afforded statutory protection.
- 1.4.7. We assume that the Proposed Changes request which is the subject of the current consultation, and which will be submitted to the Planning Inspectorate in January 2021, will include the relevant updated surveys, technical reports, impact assessments, plans and strategies associated with these changes, in addition to the significant amount of information which was omitted from the application as submitted in May 2020. For the reasons set out above, Natural England will require sufficient time to review and advise the Planning Inspectorate on this significant amount of previously omitted, amended and additional information ahead of the examination.

¹ [Making Space for Nature: A review of England's Wildlife Sites and Ecological Network](#)

² [A Green Future: Our 25 Year Plan to Improve the Environment](#)

Section 2

- 2.2.15. Natural England notes the proposals to alter the permanent BLF from the original plans as set out in the DCO application. In addition, four options are set out for an additional, temporary BLF to the south, with the aim to facilitate an increase in both abnormal indivisible loads (AILs) and bulk materials. Due to the nature of the options provided for the temporary BLF, we do not provide a preference for any option, as we believe that they each carry their own environmental risks and benefits which need to be fully assessed. Natural England also note paragraph 3.3.26 of the consultation document which states: *'Detailed engineering feasibility studies are being undertaken into the design of Options 3 and 4. This consultation document assumes that the self-elevating platforms illustrated can be deployed in this way. That work is being undertaken in parallel with this consultation. Any change from this technology, such as any need for additional piling, would be determined prior to the submission of our formal application for a change to the DCO Application and assessed accordingly. The principle of using temporary platforms to extend the BLF will not change but the precise technology for the platforms is still under review.'* We advise that any alterations which deviate from the current designs of options 3 or 4 as set out in the consultation document, particularly those which may include additional piling, be considered as a separate option for the temporary BLF design, and submitted for appropriate consultation to allow for meaningful comment. Natural England consider this proposed change to be a material change to that submitted in the DCO application. Please see our further advice under our comment reference 2 in Table 1 below.
- 2.3.9. Natural England very much welcomes the proposed change to the Sizewell Marshes SSSI crossing design from an embankment with culvert (as proposed in the DCO application submitted in May 2020) to embankments with a 30 m single span bridge section as presented in the current consultation. This is due to a number of environmental benefits this design presents over the embankment with culvert including less direct SSSI land take, better ecological and hydrological connectivity for wildlife and subsequent benefits to the AONB. In the context of paragraphs 1.2 and 1.3 of the Planning Inspectorate's Advice Note 16³, it should be noted that, throughout the pre-application period between 2012 and 2019, we consistently advised EDF Energy that the embankment with culvert option was not the least environmentally damaging option when considered against alternatives which were presented by EDF Energy at various times. Whilst this change represents progress in the context of our outstanding concerns, we will still need to review the accompanying detailed information and assessments which will need to be updated by EDF Energy in the submission to the Planning Inspectorate. Natural England consider this proposed change to be a material change to that submitted in the DCO application. Please see our further advice on this under comment reference 6 in Table 1 below.
- 2.3.18. Natural England very much welcomes the proposed change to the Sizewell B relocated facilities project, in particular the removal of the outage car park shown from within Pillbox Field as described in Option 1. Pillbox Field is within the Suffolk Coast and Heaths AONB and outside the main power station complex and as such every effort should be made to locate the car park in another location which minimises impacts to this nationally designated landscape. In the context of paragraphs 1.2 and 1.3 of the Planning Inspectorate's Advice Note 16, it should be noted that we advised EDF Energy (and East Suffolk Council as the local planning authority) during pre- and post-application that the car park should be located outside Pillbox Field (our refs: 280941, 290446, 298737 and 334939, dated 24th June 2019, 19th August 2019, 28th October 2019 and 10th December 2020 respectively). Whilst this change represents progress in the context of our outstanding concerns, we will still need to review the accompanying detailed information and assessments which will need to be

³ "the government recognises that there are occasions when applicants may need to make a material change to an application after it has been accepted for examination. Sometimes a change may result from the publication of new/ emerging government policy or on-going negotiations between an applicant and other Interested Parties... The justification for making a material change after an application has been accepted for examination must be robust and there should be good reasons as to why the matters driving the change were not identified and dealt with proactively at the Pre-application stage. Before an applicant makes a material change request it should carefully consider how it will impact upon the other Interested Parties and the Examination Timetable"

updated by EDF Energy in the submission to the Planning Inspectorate; please see our further advice on this under comment reference 3 in Table 1 below.

- 2.3.26. Natural England welcomes the proposed change to the location of the water storage area which allows the wetland habitats (open water channels and wet reedbed) in the former location to be optimised as high quality foraging habitats for marsh harriers as part of the compensation for impacts to this internationally important species. Whilst this change represents progress in the context of our outstanding concerns, we will still need to review the accompanying detailed information and assessments which will need to be updated by EDF Energy in the submission to the Planning Inspectorate. Natural England consider this proposed change to be a material change to that submitted in the DCO application. Please see our further advice on this under comment reference 5 in Table 1 below.
- 2.3.27. In terms of losses of wet woodland from Sizewell Marshes SSSI which supports a nationally important invertebrate assemblage, Natural England can accept that the statutory duty to conserve and enhance these cited features of the SSSI can, in this instance, be accomplished by providing compensatory habitat. In relation to such habitat creation, we advise that it is a widely accepted principle that compensatory habitats should ideally be in place and functioning before the loss occurs. Your proposal states that *“Once the construction of Sizewell C is complete and compensatory marsh harrier foraging habitats are no longer required, there would be an opportunity for the open water and wet reedbed habitats to be transitioned to wet woodland habitats, either through natural successional processes or through planting. In the long term, this would compensate for the loss of wet woodland from the Sizewell Marshes SSSI and could form part of a wet woodland strategy”*. This would therefore mean a sufficient quantum of wet woodland to compensate for losses from Sizewell Marshes (which support a nationally important invertebrate assemblage) would not be provided until a long time after the loss occurs, contrary to that principle. Furthermore, whilst this area may have served its legal purpose in terms of marsh harrier mitigation/ compensation at that time, in a wider biodiversity context the speeding up of succession to wet woodland in this area would likely inhibit the effectiveness of the area (open water, reedbeds) for marsh harrier and other species. Natural England’s advice is that EDF Energy should also consider and appraise other possible options for this habitat creation before committing to this location. In this respect (and with respect to the other SSSI habitats to be lost i.e. fen meadow, reedbed, ditches) we draw your attention to the powers under section 28C of the Wildlife and Countryside Act 1981 to extend SSSI boundaries to include the new land. In the context of paragraphs 1.2 and 1.3 of the Planning Inspectorate’s Advice Note 16, it should be noted that, throughout the pre-application period between 2012 and 2019, we consistently advised EDF Energy that the loss of wet woodland habitat from the SSSI must be fully and properly compensated for at an appropriate quantum; the history of our pre-application advice on this issue is outlined within our Relevant Representations (Part II, Natural England key issue reference 50, page 119-123). Whilst this change represents progress in the context of our outstanding concerns, we will still need to review the accompanying detailed information and assessments which will need to be updated by EDF Energy in the submission to the Planning Inspectorate. Natural England consider this proposed change to be a material change to that submitted in the DCO application. Please see our further advice on this under comment reference 5 in Table 1 below.
- 2.3.38. Natural England very much welcomes the proposed change to provide a further compensatory fen meadow habitat site in addition to those identified in the DCO application as submitted in May 2020. In the context of paragraphs 1.2 and 1.3 of the Planning Inspectorate’s Advice Note 16, it should be noted that, throughout the pre-application period between 2012 and 2019, we consistently advised EDF Energy that the loss of fen meadow habitat from the SSSI must be fully and properly compensated for the history of our pre-application advice on this issue is outlined within our Relevant Representations (Part II, Natural England key issue reference 49, page 115-119). Whilst this change represents progress in the context of our outstanding concerns, we will still need to review the accompanying detailed information and assessments which will need to be updated by EDF Energy in the submission to the Planning Inspectorate. Natural England consider this

proposed change to be a material change to that submitted in the DCO application. Please see our further advice on this under comment reference 10 in Table 1 below.

2.3.39. See our comments under paragraph 2.3.9 above.

Section 3

Our comments on each of the sixteen changes are presented in the table below:

Table 1: Natural England's detailed advice on the proposed changes

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
1	<p>Increase in the frequency of freight train movements to facilitate bulk material imports by rail</p> <p>(pp. 31-38)</p>	<p>The Environmental Assessment should scope in potential changes in:</p> <ul style="list-style-type: none"> Air quality impacts to sensitive designated site features as a result of the change in transport delivery strategy (HRA and ES issue); reduction in Heavy Goods Vehicle (HGV) movements should be considered against increase in diesel freight trains in this regard Noise, light and visual impacts to sensitive designated site features and protected species (HRA and ES issue) as a result of additional train movements which include more overnight Impacts to the AONB (Landscape and Visual Impact Assessment (LVIA) issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated air quality assessment for review Updated noise modelling for review Updated lighting plan for review Updated LVIA for review Updated protected species' mitigation strategies for review Updated HRA for review Updated Environmental Statement (ES) ecology chapters for review (including designated sites and protected species' impact assessment conclusions) 	<p><u>Terrestrial ecology</u></p> <p>Whilst these changes appear to be fairly minor and unlikely to alter the conclusions with regards impacts to designated site features and protected species, this needs confirming through the relevant technical reports and assessments.</p> <p><u>AONB</u></p> <p>The consultation document does not anticipate any change to impacts on the AONB from this change which appears to be a reasonable assumption which needs confirming through the relevant assessments; this change is to the pattern and type of vehicle movements and to the character of site activities and noise and not an overall set of changes which would produce a less significantly adverse construction phase for the AONB and its statutory purpose. An eventual major reduction in HGV movements (not in the early years but to coincide with peak construction) is likely to benefit the wider area but the AONB less so. It would be helpful for the applicant to confirm that this is the case through the relevant assessments.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
2	<p>Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea</p> <p>(pp. 39-57 and 157-161)</p>	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on coastal processes and to sensitive designated site features as a result of additional infrastructure (HRA and ES issue) Air quality impacts to sensitive designated site features as a result of less HGVs on the roads but more marine emissions and changes to dust management (HRA and ES issue) Noise impacts to sensitive designated site features as a result of additional infrastructure (HRA and ES issue) Impacts to the AONB as a result of additional infrastructure (LVIA issue) Impacts to the ECP as a result of 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated baseline species' and habitat surveys covering additional areas for review Updated air quality assessment for review Updated noise modelling for review Updated lighting plan for review Updated LVIA for review Updated ECP mitigation plan for review Updated HRA for review Updated ES ecology chapters for review (including designated sites and protected species' impact assessment conclusions) 	<p>Natural England consider this proposed change to be a material change to that submitted in the DCO application.</p> <p><u>Terrestrial ecology</u></p> <p>This change could potentially alter the way people use the area for recreation with respect to knock-on displacement effects to nearby sensitive designated sites and this should be assessed.</p> <p><u>Coastal Processes</u></p> <p>Increased requirement for marine dredging could either alone or in combination affect sediment transport and coastal evolution. Page 55 includes statements that Options 1, 2 & 3 could have '<i>moderate significant effects</i>'. In the absence of fresh evidence/ modelling to confirm otherwise, this in turn could impact coastal sediment transport and evolution to the north, and it is not yet possible to know or advise with confidence whether or not there will be a knock-on impact on coastal habitats to the north, or indirect impacts on designated features of Minsmere-Walberswick. This could also alter the HRA conclusions.</p> <p><u>Marine Ecology</u></p> <p>Further benthic surveys will be required. Mainly linked to benthic habitat providing prey species for designated features of surrounding SPAs. Consider loss of habitat from piles and potential shading from pier/platforms, depending on turbidity – this also makes habitat unavailable for foraging birds. Increased vessel movement, and associated dredging, including times of year need to be properly assessed as well as potential increased area for non-native invasive species. Permanent loss of seabed under the enhanced permanent BLF should be factored into BNG calculations.</p> <p><u>Marine Ornithology</u></p> <p>The Environmental Assessment and HRA will need updating to allow for increased boat traffic. Natural England note the ability for Option 4 to extend the operating window of the temporary BLF to include winter months. However,</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
		<p>additional infrastructure (amenity and recreation issue)</p> <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> Increased light and visual impacts to sensitive designated site features (HRA and ES issue) Recreational disturbance assessment (HRA and ES issue) as a result of additional infrastructure (e.g. conveyor) which may change recreation habits BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<ul style="list-style-type: none"> Updated recreational disturbance management and monitoring strategy for review Updated BNG report for review Updated OLEMP for review Updated coastal processes modelling for review 	<p>we would advise a commitment that April – September operating be secured within the DCO to minimise potential disturbance to over-wintering Red-throated divers from the Outer Thames Estuary SPA. While there is not enough detail presented to assess the risk from a HRA perspective, details presented suggest no material change to main areas of risk for breeding terns (i.e. foraging impacts and operation of cooling system). The other area of risk for breeding bird interests is associated with changes in coastal processes, and impacts on nesting habitats. We request further evidence/modelling to back-up the assertion of no impact. Risk to forage fish community is only alluded to in terms of piling noise, under the Marine Ecology section on page 53. Natural England advise that there is a likelihood that kittiwakes from the nearby Sizewell County Wildlife Site (CWS) may attempt to adopt these structures. This risk is greatly increased as the piers will not be directly connected to shore. Behaviour of birds from the colony attempting to breed at Minsmere indicates the colony may be at capacity and seeking to expand. We advise the consideration of management options needs to be made alongside choice of BLF design. A bespoke additional structure for kittiwakes to nest, or specific design to allow kittiwakes to nest while operational may be required. Some kittiwake colonies are located in industrial areas; so with sensitive design, co-location of birds with operation facility may be possible.</p> <p><u>AONB</u></p> <p>This is a significant change from a landscape and visual (AONB) perspective. It will bring much more construction phase activity down across the beach both in terms of structures and activity. It would tie the beach, for all intents and purposes and certainly in how people perceive things, into the main construction site. The consultation promises a revised assessment of effects on landscape and visual resources which is welcome. It would be helpful to know whether greater material movements by sea could reduce the length of the construction phase. That may not outweigh additional adverse effects on the AONB but may be a mitigating factor.</p> <p><u>ECP</u></p> <p>Further information should be provided on how this change might affect the ECP mitigation including the temporary diversion plan.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
3	<p>Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field</p> <p>(pp. 59-71)</p>	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> Noise, light and visual impacts to sensitive designated site features and protected species arising from the newly proposed works (HRA and ES issue) Air quality (dust) impacts to sensitive designated site features arising from the newly proposed works (HRA and ES issue) BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated noise modelling for review Updated lighting plan for review Updated air quality assessment for review Updated LVIA for review Updated HRA for review Updated ES ecology chapters for review (including designated sites and protected species impact assessment conclusions) Updated BNG report for review Updated OLEMP for review 	<p><u>Terrestrial ecology</u></p> <p>Any changes to designated site and protected species impacts arising from the newly proposed works need to be considered through the relevant technical reports and assessments. There may also be slight changes to the BNG calculations.</p> <p><u>AONB</u></p> <p>We welcome the proposal for the car park to be removed from Pillbox Field (as per Option 1) and for the height of the training centre to be reduced (Options 1 and 2). Option 1 is very much our preferred option in terms of the AONB.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
4	Change to certain parameter heights and activities on the main development site to facilitate the construction process (pp. 71-76)	The following potential changes are scoped in which we welcome: <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) Impacts to the ECP (amenity and recreation issue) 	Further assessment work required would appear to include: <ul style="list-style-type: none"> Updated LVIA for review Updated ECP mitigation plan for review 	<p><u>AONB</u></p> <p>It is impossible to visualise what these changes would mean in practice but a revised assessment should be able to tell us more. As with other construction phase issues on the MDS, the significant adverse effects have already been identified and this would likely serve to underline those.</p> <p><u>ECP</u></p> <p>Further information should be provided on how these changes might affect the ECP mitigation including the temporary diversion plan.</p>
5	Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk (pp. 77-82)	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> Impacts from potential hydrological changes to sensitive designated site features (HRA and ES issues) The marsh harrier (SPA/ Ramsar/ SSSI-level impacts) and Sizewell Marshes SSSI wet woodland compensation 	Further assessment work required would appear to include: <ul style="list-style-type: none"> Updated marsh harrier compensation strategy for review (for SPA/ Ramsar/ SSSI-level impacts) Wet woodland compensation strategy for review (SSSI loss) Updated eco-hydrological modelling for review (for SPA/ Ramsar/ SSSI-level impacts) Updated protected species' mitigation strategies for review 	<p>Natural England consider this proposed change to be a material change to that submitted in the DCO application.</p> <p><u>Terrestrial ecology</u></p> <p><i>General</i></p> <p>Changes to designated site and protected species impacts arising from the newly proposed works need to be considered through the relevant technical reports and assessments, including potential hydrological changes to Minsmere. This change will also likely result in changes to the BNG calculations.</p> <p><i>Marsh harrier</i></p> <p>We welcome the relocation of the water storage area which means that the wetland habitats created within the marsh harrier mitigation/compensation area can be maximised for wildlife benefit without the constraints as a dual-purpose water storage area.</p> <p><i>Sizewell Marshes SSSI wet woodland/invertebrate assemblage compensation</i></p> <p>Natural England very much welcomes the commitment to provide further compensatory wet woodland habitat in addition to that identified in the DCO application as submitted in May 2020. We advise that EDF Energy undertake a</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
		<p>proposals (HRA and ES issues)</p> <ul style="list-style-type: none"> BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<ul style="list-style-type: none"> Updated BNG report for review Updated OLEMP for review Updated HRA for review Updated ES ecology chapter for review (including designated sites and protected species impact assessment conclusions) 	<p>full appraisal of this proposed option and other potential options for the location of this habitat; this site appears to have pros and cons in that it is close to the SSSI loss (although limited hydrological/ecological connectivity) but would not (as proposed) come into play as wet woodland compensation until after the c.10 year construction period by which time it will have served its legal purpose as marsh harrier mitigation/compensation (Habitats Regulations requirement). In a wider biodiversity context, wet woodland in this area could potentially inhibit the effectiveness of the area (open water, reedbeds) for marsh harrier and other important species in the longer term. EDF Energy should also consider impacts on other habitats and species during creation – Sizewell Marshes has 'Assemblages of breeding birds - Lowland damp grassland' as a SSSI feature and any proposals would need to consider the impacts on these. There are also potential concerns about corvids watching from trees close to the marshes for nesting birds and then raiding nests. This option would also need considering in terms of 'time to condition' i.e. if the compensation will not be in place and functioning for a long time (i.e. >10 years), a greater quantum of habitat would likely be needed. Should this option be pursued, we advise that the creation of transient/ successional habitats (open water/ reedfen through to wet woodland) should be through natural succession rather than planting wherever possible.</p> <p><u>AONB</u></p> <p>It may be of little consequence to the AONB about where within the construction area this storage is located. It will simply form part of the overall change to the construction site and within the context of significant adverse construction phase effects. If this alternative site would provide greater ecological benefits over the long term (either as open wetland or wet woodland) then it is likely to perform well as a landscape feature. We advise that the Suffolk Coast and Heaths AONB Team should be consulted in terms of actual landscape character to confirm that this is appropriate and does not detract from other expressions of landscape character. They will be guided by their local expertise and the area's management plan and Landscape Character Assessment.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
6	Change to the SSSI crossing design to a single span bridge with embankments (pp. 82-86)	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) Impacts on protected species (ES issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> Impacts from potential hydrological changes to sensitive designated site features (HRA and ES issues) Direct losses of Sizewell Marshes SSSI habitat to the crossing footprint (ES issue) BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated LVIA for review Protected species' mitigation strategies for review Updated eco-hydrological modelling for review (for SPA/Ramsar/SSSI-level impacts) Updated wet woodland compensation strategy for review (SSSI loss), Updated BNG report for review Updated OLEMP for review Updated HRA for review Updated ES ecology and alternatives appraisal chapters for review (including 	<p>Natural England consider this proposed change to be a material change to that submitted in the DCO application.</p> <p><u>Terrestrial ecology</u></p> <p><i>General</i></p> <p>Changes to designated site and protected species impacts arising from the new design will need to be fully considered through the relevant technical reports and assessments. This will need to consider any changes in Sizewell Marshes SSSI habitat loss (which according to paragraph 4.5.8 would be reduced), to hydrological connectivity (which will likely be improved) and to ecological connectivity (which will likely be improved for bats, otters and water voles as per paragraph 4.5.14). Whilst this design option therefore represents progress when considered against the 'embankment with culvert' design option presented within the DCO application, as per section 4.4. and paragraph 5.3.7 of National Policy Statement (NPS) EN-1, it should also be fully considered against any other possible alternatives including those which may be even less damaging in terms of SSSI land take, hydrological and ecological connectivity, AONB impacts etc. This should include the clear span bridge option which was presented by EDF Energy during the pre-application consultations. This change will also likely result in changes to the BNG calculations</p> <p><i>Invertebrates (Sizewell Marshes SSSI and more widely)</i></p> <p>The change in design is a welcome improvement in terms of increased light and greater connectivity within the watercourse for invertebrates. An increase in height of the bridge above that proposed (i.e. >4m) would improve this further in terms of reducing impacts to invertebrates by increasing light availability. We advise that the possibility of raising the crossing height from the outset should be considered, although there would need to be assessment of any subsequent additional impacts to Sizewell Marshes SSSI (e.g. if this would require a larger amount of loss) and the AONB (see below).</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
			designated sites and protected species impact assessment conclusions)	<p><u>AONB</u></p> <p>From a landscape/AONB perspective, we consider the best SSSI crossing design option to be that which provides the best chance of maintaining the internationally and nationally important wetlands of Minsmere and Sizewell Marshes in good condition. This in turn maintains an important landscape feature and component of local landscape character. Whilst bridge design and aesthetics remains an important consideration, incorporating a higher structure from the outset to further ensure the future of these wetlands as a visibly thriving should outweigh an adverse effect on the AONB resulting from the bridge. This also needs to be considered in the context that EDF Energy's proposals are to raise the height of the crossing in the future anyway; this would cause ecological and landscape disruption at a time when wildlife will likely be starting to recover/adapt and the landscape mitigation starting to settle following the initial crossing construction. An amended LVIA will need to set out the details of this.</p>
7	<p>Revisions to tree retention on the main development site</p> <p>(pp. 86-94)</p>	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) Impacts on protected species (ES issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> Impacts on ancient and veteran trees BNG calculations due to changes in losses/gains of non- 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated LVIA for review Updated protected species' mitigation strategies for review Ancient and veteran trees mitigation strategy for review Updated ES ecology chapters for review Updated BNG report for review 	<p><u>Terrestrial ecology</u></p> <p><i>General</i></p> <p>Changes to protected species impacts, in particular bats, arising from the additional tree and hedgerow removal works need to be considered through the relevant assessments. This change will also likely result in changes to the BNG calculations.</p> <p><i>Ancient and veteran trees</i></p> <p>Two areas of woodland appear to be affected by the proposals and subsequent changes in impacts will need to be detailed. Potential impacts on ancient woodland should be covered; this area has not had an ancient woodland inventory update and there may be woodlands, especially those under 2ha, which are ancient but not on the inventory. Some of the hedgerow changes are adjacent to wood pasture parkland priority habitat west of Leiston Abbey which may increase the probability of ancient and veteran trees in the vicinity. Changes are reported to have no net loss of hedgerow and hedgerow trees, however, opportunities should be explored for gain especially for</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
		statutorily designated habitats (e.g. priority habitats) (ES issue)	<ul style="list-style-type: none"> Updated OLEMP for review 	<p>hedgerow trees, such as replacements for those lost to ash dieback in the vicinity.</p> <p><u>AONB</u></p> <p>These are very minor changes in the context of wholesale changes to the MDS will make no difference to the scale or assessment of landscape and visual impacts.</p>
8	Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall (pp. 94-97)	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) Impacts from potential hydrological changes to sensitive designated site features (HRA and ES issues) Impacts on coastal processes and to sensitive designated site features (HRA and ES issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> The ECP mitigation arrangements (amenity and recreation issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated LVIA for review Updated ECP mitigation plan for review Updated eco-hydrological modelling for review (SSSI-level impacts); Updated HRA for review Updated ES ecology chapters for review (including designated sites impact assessment conclusions) 	<p><u>Terrestrial ecology</u></p> <p>Changes to designated site impacts arising from the newly proposed works need to be considered through the relevant technical reports and assessments, including any potential hydrological changes.</p> <p><u>Coastal processes</u></p> <p>We advise that this change is unlikely to present a significant additional issue from a coastal process perspective, especially given the volumes of sediment nourishment likely to be needed to maintain sediment transport along the foreshore. This should be confirmed through the revised assessment work.</p> <p><u>AONB</u></p> <p>In landscape and visual terms this is an individually small structure and its temporary status is noted. There should, however, be some consideration of how the outflow combines with other beach construction phase structures (larger beach landing facility and materials conveyor) to cumulatively affect the coastal landscape.</p> <p><u>ECP</u></p> <p>Further information should be provided on how this change might affect the ECP mitigation including the temporary diversion plan.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
9	Change to the sea defence to make the scheme more efficient and resilient to climate change (pp. 97-101)	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> Impacts on the AONB (LVIA issue) Impacts on coastal processes and to sensitive designated site features (HRA and ES issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> The ECP mitigation arrangements (amenity and recreation issue) Recreational disturbance assessment (HRA and ES issue) as a result of the change which may alter recreation habits BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated LVIA for review Updated ECP mitigation plan for review Updated recreational disturbance management and monitoring strategy for review Updated coastal processes modelling for review Updated HRA for review Updated ES ecology chapters for review (including designated sites impact assessment conclusions) Updated BNG report for review Updated OLEMP for review 	<p>Natural England consider this proposed change to be a material change to that submitted in the DCO application.</p> <p><u>Terrestrial ecology</u></p> <p>This change could potentially alter the way people use the area for recreation with respect to knock-on displacement effects to nearby sensitive designated sites and this should be assessed. It will also likely result in changes to the BNG calculations with respect to grassland, scrub, dune grassland and vegetated shingle habitats in this area.</p> <p><u>Coastal Processes</u></p> <p>Considering the proposed bigger, higher structure and more advanced seaward toe end of the hard coastal defence feature (hCDF), coupled with a larger and additional BLF, we require further evidence and assurance that previous conclusions in the ES (regarding sediment transport and risk to coastal evolution and habitats to the north, including Minsmere-Walberswick) will not be altered in a way that puts designated wildlife sites to the north at risk.</p> <p><u>Ornithology</u></p> <p>The need for an enhanced sea defence that will incorporate substantive areas of soft engineering offers significant potential for the enhancement of populations of species associated with pioneer sand dune and shingle communities, including plants, invertebrates and breeding birds (e.g. little tern, common tern, oystercatcher, ringed plover). While breeding bird interests would require some management of public access to the sea defence, which does not appear to be detailed in the consultation document, this has the potential to provide a considerable positive outcome for biodiversity.</p> <p><u>AONB</u></p> <p>It appears that for the construction phase the temporary sea defences would now be sheet piling instead of a vegetated bund. This is a significant change</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
				<p>and introduces more visible industrialisation of the beach frontage (added to the beach landing facility etc). A seven to ten metre high steel barrier will be an imposing unnatural feature. For the operational phase sea defences the increased height and bulk of the bunding is noted. It reinforces the point that this part of the AONB is being permanently altered with landform that will clearly present as manmade.</p> <p><u>ECP</u></p> <p>Further information should be provided on how this change might affect the ECP mitigation including the temporary diversion plan.</p>
10	<p>Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss</p> <p>(pp. 101-110)</p>	<p>The following potential changes are scoped in which we welcome:</p> <ul style="list-style-type: none"> ▪ The Sizewell Marshes SSSI fen meadow compensation proposals (ES issues) ▪ Potential impacts on Pakenham Meadows SSSI as a result of the works, in particular from any hydrological changes (ES issue) <p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> ▪ Impacts to protected species (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> ▪ Baseline surveys and mitigation strategies for protected species for review ▪ Fen meadow (Sizewell Marshes SSSI loss) compensation strategy for review ▪ Updated ES ecology chapters for review (including designated sites impact assessment conclusions; this should include Pakenham Meadows SSSI) 	<p>Natural England consider this proposed change to be a material change to that submitted in the DCO application.</p> <p><u>Terrestrial ecology</u></p> <p><i>Pakenham Meadows SSSI</i></p> <p>Potential impacts to Pakenham Meadows SSSI from the proposed works need to be considered through the relevant technical reports and assessments, in particular any potential hydrological changes.</p> <p><i>Sizewell Marshes SSSI – fen meadow compensation</i></p> <p>We very much welcome the provision of further compensatory fen meadow habitat in addition to that identified in the DCO application as submitted in May 2020. We understand that, should the habitat creation be successful across all three proposed compensation sites, the total quantum provided would now meet the 9x multiplier (i.e. fen meadow habitat created nine times greater than that being lost from Sizewell Marshes SSSI) which we have consistently advised is required given the complexity and uncertainty involved in creating this habitat.</p> <p>The key point at which we will be able to advise further on the likely success of the compensation approach is once the Fen Meadow Strategy and Fen Meadow Plan are finalised and available for us to review for this site (and the other sites). These should include assessment of the site-specific details on</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
		<ul style="list-style-type: none"> The BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<ul style="list-style-type: none"> Updated BNG report for review Updated OLEMP for review Updated ES ecology chapters for review 	<p>ecohydrology, hydrochemistry, topography, restoration approach, monitoring plans etc. and contingency plans should the compensatory habitat creation prove unsuccessful.</p> <p><i>General</i></p> <p>This change will likely result in changes to the BNG calculations with respect to wider loss/gains of habitats in this area (i.e. outside of the SSSI compensation proposals).</p>
11	<p>A new bridleway link between Aldhurst Farm and Kenton Hills</p> <p>(pp. 111-114)</p>	<p>The Environmental Assessment should scope in potential changes in:</p> <ul style="list-style-type: none"> The ECP mitigation arrangements (amenity and recreation issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated ECP mitigation plan for review 	<p><u>ECP</u></p> <p>Further information should be provided on how this change might affect the ECP mitigation including the temporary diversion plan.</p>
12	<p>Extension and reduction of the Order Limits for works on the main development site and related sites (fen meadow mitigation sites and marsh harrier improvement sites)</p> <p>(pp. 114-120)</p>	<p>The Environmental Assessment should also scope in potential changes in:</p> <ul style="list-style-type: none"> The BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated BNG report for review Updated ES ecology chapters for review 	<p><u>Terrestrial ecology</u></p> <p>We advise that the BNG calculations should be updated to reflect these minor changes as necessary.</p>

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
13	Southern park and ride at Wickham Market - Extension of landscaped bund and other minor changes (pp. 121-127)	The Environmental Assessment should also scope in potential changes in: <ul style="list-style-type: none"> Impacts to protected species (ES issue) The BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	Further assessment work required would appear to include: <ul style="list-style-type: none"> Updated protected species' mitigation strategies for review Updated BNG report for review Updated OLEMP for review Updated ES ecology chapters for review (including protected species impact assessment conclusions)	<u>Terrestrial ecology</u> Although they appear to be minor, any changes to protected species impacts arising from the additional works need to be considered through the relevant technical reports and assessments. The BNG calculations should also be updated to reflect these minor changes as necessary.
14	Sizewell link road - Extension to and reduction of the Order Limits (pp. 127-136 and 163-168)	The following potential changes are scoped in which we welcome: <ul style="list-style-type: none"> Impacts from potential hydrological changes to sensitive designated site features (HRA and ES issues) The Environmental Assessment should also scope in potential changes in:	Further assessment work required would appear to include: <ul style="list-style-type: none"> Updated HRA for review Updated ES ecology chapters for review (including designated sites impact assessment conclusions) Updated protected species' mitigation strategies for review 	<u>Terrestrial ecology</u> Update to hydrological impacts may be needed to account for findings that infiltration rates for road runoff are lower than expected. This should assess any increased effect on the two main rivers crossed by the link road that feed into Minsmere to Walberswick SSSI in terms of flow rates and pollution. Where the increased order limits are for additional attenuation basins there is the potential for reducing the level of pollution entering the Minsmere Old River and the wider SSSI. This would be through opportunities for increased sedimentation of road runoff water in basins. The BNG calculations should also be updated to reflect these changes as necessary. <u>AONB</u> The link road is outside but in the setting of the AONB. We do not have detailed knowledge of the route and are not in a position to comment on how these modifications would affect how the road relates to its immediate and

Natural England comment reference	Proposed Change	Advice on the scope of the 'Updated Environmental Assessment'	Advice on the 'Next Steps and Further Assessment'	General advice
		<ul style="list-style-type: none"> Impacts to protected species (ES issue) The BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<ul style="list-style-type: none"> Updated BNG report for review Updated OLEMP for review 	wider landscape setting, especially the AONB. We will therefore need to defer to the local experts i.e. the AONB and LPAs to offer advice here.
15	Two village bypass – Extension of the Order Limits and other changes (pp. 137-144)	<p>The Environmental Assessment should scope in potential changes in:</p> <ul style="list-style-type: none"> The BNG calculations due to changes in losses/gains of non-statutorily designated habitats (e.g. priority habitats) (ES issue) 	<p>Further assessment work required would appear to include:</p> <ul style="list-style-type: none"> Updated BNG report for review Updated OLEMP for review Updated ES ecology chapters for review 	<p><u>Terrestrial ecology</u></p> <p>We welcome the identified opportunity to use land within the Order Limits of the proposed Two Village Bypass to provide habitat to mitigate for the loss of the floodplain grazing marsh habitat to the bypass (also described in paragraph 2.5.8 of the consultation document). As we have previously advised, this is a priority habitat as defined within section 41 the NERC Act (2006) and is listed by the Secretary of State⁴ as being of principal importance for the conservation of biodiversity. Every effort should therefore be made to avoid, mitigate or compensate for impacts to it. Where impacts to this habitat (and other section 41 priority habitats within the scheme more widely) cannot be avoided, mitigated or compensated for, its loss/damage should feed in to EDF Energy's BNG calculations as per the advice outlined within our Relevant Representations (Part II, Natural England key issue references 22 and 23, pages 69-74).</p>
16	Other Associated Development Sites – Reduction of the Order Limits (pp. 145-150)	None	None	None

⁴ Section 41 of the Natural Environment and Rural Communities Act 2006.

Relevant Representation of Dr Thérèse Coffey, MP for Suffolk Coastal concerning EDF's proposals for the Sizewell C Nuclear Power Station

In my response to the preliminary stage of the planning application process that I submitted in September, I made clear that I was backing Sizewell C but encouraged EDF to make some significant changes to their planning application in order to get consent.

Having read the additional detail set out in the latest consultation (18th November – 18th December 2020), I'm pleased that EDF seem to have listened to the previous consultation responses, not just from me but from local councils and local residents and have come up with further changes to make their application more palatable. I am, therefore, restricting my remarks in this document purely to the changes that have been made since my last submission. The other comments I made in my September submission still stand.

I wish to bring the following matters to the Examining Authorities attention:

Transport

I'm pleased to see that EDF are now proposing to bring in a majority of freight (circa 60%) by both rail and seaborne methods and just 40% by HGV. As I set out in my previous submission, bringing in the majority of freight in by road would have had a significant impact on our highway network, especially during the construction phase. In order to achieve this, I back the construction of a second beach landing facility to transport additional bulky construction materials into the site.

I also back EDF's proposal to increase the frequency of freight train movements to facilitate additional material imports by rail, as it will take further pressure off our highway network. Unfortunately, as EDF are still not proposing a passing loop a majority of these additional freight journeys will take place using overnight trains. In fact, the number of overnight trains increases from 5 to 7 movements. I previously raised my concerns about the impact this would have on the residents that live close to the East Suffolk line. Having held a meeting with Network Rail, I suggested that there was a range of mitigation measures EDF should put in place to reduce the impact of noisy trains and train screech. I'm pleased that EDF have taken on board those suggestions and are now proposing an investment in continuous long-welded track to reduce vibrations as well as looking at quieter rolling stock which operate at slower speeds.

Sizewell Link Road

Whilst I welcome the minor amendments to ensure better visibility splays for the new Sizewell Link Road, I would still strongly suggest that this should be removed on completion of the project. A permanent road in this location would have a detrimental impact on the landscape and have no legacy benefit.

Other Highways Matters

I strongly oppose reducing the speed limit on the A1094/B1069 junction to 40mph as I don't think it's necessary.

There may also be unintended consequences of introducing quite so many roundabouts on the A12 and B1122 on traffic flows. I recognise that modelling will have been done but if that turns out to be incorrect then EDF should be expected to introduce traffic lights to keep traffic flows moving. Although I usually oppose traffic lights on roundabouts, there are ways to introduce them appropriately, either so they are speed sensitive or only work for certain times of the day, reflecting peak hours.

Environmental Impacts

As I said in my submission, I'm keen to see EDF contributing to nature recovery as well as just mitigation which is why I welcome their commitment to establish an independent Environmental Trust to manage rewilding and the biodiversity of the growing Sizewell estate. They're also now proposing to use less of the AONB by utilising existing brownfield land for current buildings that have to be moved and creating more fen meadow.

As I said in my previous submission, it is now a question for the regulators – the Environment Agency, Natural England and the Marine Management Organisation – whether EDF have done enough on this matter.

Dr Thérèse Coffey MP



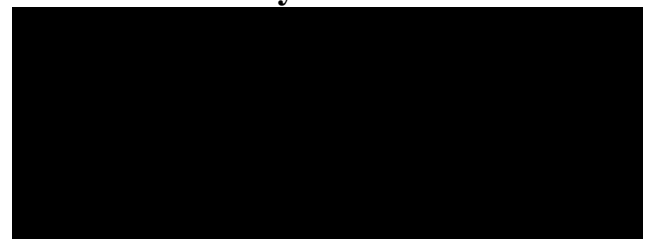
Minsmere Levels Stakeholders Group

Planning Group

Convenor: John Keeble

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Co-Secretary : Paul Collins



Friday, 18 December 2020

Response to the Fifth Consultation of the Proposed Development of Sizewell C Nuclear Power Station

This response is submitted on behalf of the **Minsmere Levels Stakeholders Group (MLSG)**. Our primary objective is

‘To identify and then represent matters that are of common interest to those living and working in close proximity to the Minsmere Levels as well to others who have a concern for the future of the marshes’

Background

Following submission and acceptance of EDF’s Development Consent Order Application (DCO) by the Planning Inspectorate (PINS) and submission of a s56 Relevant Representation by MLSG and others, EDF has submitted a number of potential changes to the DCO for public consultation. This consultation has effectively paused the DCO examination process and EDF will submit substantive changes to PINS week commencing 11th January 2021 based on consideration of responses to this consultation and the needs, as EDF see them, of the project.

Summary

1. MLSG are disappointed, once again, that following 4 previous consultations over a 8-year period, after submission and acceptance of an inadequate DCO and submission of s56 Relevant Representations, that EDF have changed their minds and added yet another public consultation outside of the formal National Strategic Infrastructure Planning process. The nature of the issues within this consultation, should they go forward as substantive changes to the DCO and be accepted by the Examining Authority (ExA), will require further submissions to amend or replace existing Relevant Representations already submitted to PINS. Such behaviour, so soon after the s56 consultation period ended, shows that these changes were well

formed even before the DCO was submitted for examination acceptance and would have been more properly dealt with by delaying the DCO submission to ensure that the DCO represented the expected scope and definition of the project from the beginning.

2. We are, once again, disappointed that clarification of the design of the hard coastal defence (HCD) is still lacking, although it is now clearly a greater threat to coastal stability and erosion than sketched out in the DCO itself. As coastal erosion continues apace along this part of the coast along with increased frequency and ferocity of storms, the advanced hard point created by the HCD and beach landing facility (BLF) at the northern extreme of the site will interrupt sediment transport across the front of all the Sizewell sites and potentially damage areas south of the site at Thorpeness and Aldeburgh because of accretion local to the Sizewell C site.
3. Constraints on the site that have required pylons to carry high voltage connections from the generators to the substation, instead of via underground cable runs and a HCD that previously advanced to within a few meters of the front of the existing sacrificial dune is too constrained at 32 hectares to host two nuclear reactors. This is supported by the fact that EN-6 envisages single nuclear reactors to have a site size of around 30 hectares and Hinkley Point C operational site is approximately 45 hectares. Furthermore, in raising the HCD to 14m from 10.2m, the toe of the HCD will now move ~8m towards the beach and will likely go beyond the existing sacrificial dune and into the beach. Proposed adaptation in 2046 will take the toe of the HCD even further towards the sea, earlier than discussed in the DCO.
4. We remain concerned that EDF place excessive reliance on sediment accretion north of the site to protect both Minsmere South Levels and the new SSSI crossing as there is no guarantee that the accretion will occur either early enough or extend far enough north to prevent breach at both the tank traps and several hundred meters north of the proposed HCD and permanent Beach Landing Facility (BLF). A breach at either point would enter the Minsmere Levels close to the SSSI crossing and threaten the stability of this design of crossing. A bridge design, as originally proposed in early consultations, would be environmentally more neutral and less threatened should a breach occur.
5. The temporary BLF options are proposed in conjunction with a variety of rail options to reduce the reliance on HGV transport for aggregate and other suitable materials. However, all the options show a similar design and are situated in a single position. Effectively any comment on the appropriateness of these options will constrain the ability of EDF to make good on their goal to reduce the use of HGV transportation. EDF's proposed design should be that which minimises the coastal impact whilst maximising the goal of reducing HGV transport in conjunction with expanded rail. It has been indicated that an alternative might be for a conveyor belt jetty that would have much less impact than the previous jetty, as proposed in prior consultations but rejected at consultation 3 due to adverse coastal and environmental impacts. It would be quite unacceptable if such a jetty was eventually proposed for the DCO amendment in January or even later in the examination process.

6. We remain concerned that the new SSSI crossing design as a 30m wide culvert with embankments at both ends will still have significant impact on hydrology between Sizewell Marsh and Minsmere South Levels and ultimately Minsmere Sluice. This structure has no final design, runs across deep peat and any compression beneath the structure will alter groundwater response. The 55m long tunnel beneath the structure will not provide an appropriate habitat connection between the two designated areas. A bridge supported by pillars would not result in peat compression with attendant groundwater response or the level of habitat loss and habitat connectivity that this design will potentially result in.

Coast and Shoreline

7. The consequences of raising the crest of the HCD to 14m from 10m will be the advancement of the toe of the defence by some 8m towards the sea unless the crest of the HCD can be moved back towards the platform itself, which is unlikely given the existing space constraints on the platform. This is likely to mean the toe of the defence ends up below the beach in front of the existing sacrificial dune. It also means that the existing sacrificial dune will be destroyed and the beach itself will be disturbed.
8. The toe of the initial HCD will finish at AOD which is inadequate for a competent HCD.
9. In the DCO the expected exposure of the HCD was given as around 2050. For a HCD 8m closer to the sea, this date will be significantly advanced.
10. No information, maps or drawings are given to show where the new HCD toe is relative to the existing sacrificial dune making any assessment of this new proposal impossible.
11. In 2046 it is proposed that the HCD is adapted and the crest raised a further 1m to 15m, a new layer of rock armour laid on top of the original HCD and the toe of the adaptation will go beyond the original toe and finish below AOD. However, no dimensions or final depth of the toe are given. For any HCD defence to be competent it needs to finish below Mean Low Water Springs. Whether this new toe achieves that is not indicated and yet again it is not clear where in relation to the current sacrificial dune and beach any of these sketch plans for the HCD refer.
12. It is questionable, given the initial HCD will be exposed early and the toe being only at AOD, that adaptation will be possible as it is likely that the initial HCD will be being undermined by normal tidal action in around 2046. Any severe storm could accelerate exposure significantly based on experience both north and south of the Sizewell frontage.
13. In the DCO excessive reliance is placed upon sediment accretion north of the HCD and BLF to stabilise and prevent breach into South Minsmere Levels and close to the SSSI crossing. Such reliance is unfounded and represents a real risk to the site and all structures to the north of the site.
14. We note that in the Sizewell B Facilities Relocation planning application, a reference to a breach at the tank traps as being the worst-case planning scenario and proceed to look at the flood risk assessment (FRA) based on this breach point. Given the eroding nature of the coast at this point, it is highly likely that breach would occur both at the tank traps and at the point examined in Stage 3 consultation. The flood zones that run behind the sacrificial dune to the Leiston

Drain combined with HCD at the BLF and new northern edge of the platform would divert the breach inland to meet the Leiston Drain and the proposed new “bridge” and embankments which are not protected. Excessive reliance on exposure of the new HCD creating sufficient accretion to prevent breach at the tank traps and further north fails to apply a cautious approach to the overall safety of the site and its access.

15. In the DCO document a Soft Coastal Defence feature (SCD) is discussed along with some strategies for maintaining it as it is eroded naturally by wave action as per the current sacrificial dune. However, this consultation seems to question the effectiveness of any SCD, and no discussion is entered into about how it might be maintained.
16. As the HCD is significantly forward of the DCO proposal, it is likely that the SCD will be unsustainable and that natural embayment once the northern end of the HCD and BLF are exposed will result in any SCD being removed. The embayment south of the new HCD may result in damage to the soft and hard defences at SZC, SCB and SZA. Additional modelling and evidence for examining the effect of the new HCD, both un-adapted and adapted, and any associated SCD is totally lacking in this consultation. This is wholly unacceptable.

Surface, and Ground Water Management

17. We remain concerned that insufficient information has been given or modelled to conclude that there will not be significant changes to both surface and groundwater behaviour and that as a result water quality, particularly in Sizewell Marsh SSSI, will not be affected.

Spoil, Sand & Gravel Heaps

18. The addition of another stockpile is unacceptable and the comments in our Stage 3 Consultation Response remain unchanged.

Temporary Beach Landing Facility

19. The four options for this additional facility on the coast need to be optimised based on the reduction of HGV usage through a combination of increased rail and the capacity of this temporary BLF.
20. MLSG contends that the addition of a temporary BLF can only be justified if we can be assured that any impact on coastal longshore drift is minimised. Otherwise Thorpeness and Aldeburgh will be exposed to erosion of the kind that happened during the construction of Sizewell B.
21. It would appear from the information provided by EDF that the structure that minimises negative impact is option 4, as it goes beyond the in-shore bar and requires less intervention in terms of dredging or installation of grillage. However, we note that EDF have said in meetings with Theberton and Eastbridge Parish Council that additional piling maybe required to stabilise the structure overwinter when the BLF is inoperative. Further evidence of the impact on longshore drift is required to ensure that any final design and piling plan does not impede sediment flow across the frontage.

22. It was suggested at the same meeting, referred to in 21 above, the possibility that a simple jetty structure may in the end be used, sufficient to support the operation of the conveyor system. If this is truly a possibility, it is unacceptable that this does not appear in this consultation and simply confirms an impression that insufficient preparation has been done prior to submission of the DCO or even this consultation.

Conclusion

23. MLSG remains unconvinced that the current proposal makes an adequate case for a two-reactor development on the 32-hectare platform as there are significant issues surrounding the HCD and the ability of EDF to manage all the elements into such a confined space.
24. MLSG supports the Environment Agency in their calls in their Stage 3 response for more complete Environmental Impact information in order that they can make an adequate assessment of the proposal
25. MLSG supports the SCDC and SCC in their response regretting that insufficient information has been provided to adequately respond to the consultation and assess whether the proposal provides a sustainable benefit for the community and county as a whole. Unfortunately, this request and lack of response from EDF has been characteristic of all stages of consultation over the past 8 years and it is regrettable that we will have to wait until the Development Consent Order application to get a real view of the impact of this development, even though we can see that the impact to the surrounding designated landscapes and coast will be significant and long lasting.

RSPB and SWT Response to Sizewell C Consultation on Proposed Changes

November – December 2020

The RSPB and Suffolk Wildlife Trust (SWT) have reviewed the consultation materials regarding the proposed changes to the Sizewell C Application and have prepared the following joint response to the proposals, using the headings and subheadings in the Consultation document and focusing on key areas of concern.

1. Comments on the Introduction

Paragraph 1.1.4 describes the pre-application consultation carried out by the Applicant and how this was used to finalise the Application. We believe the need for this additional consultation on proposed changes following the Application confirms our concerns regarding the adequacy of the DCO Application, as raised in our previous letter to the Planning Inspectorate (PINS)¹.

Paragraph 1.1.7 and Section 1.4 describe the process for proposing changes to the Application before the Examination starts. We understand the formal change application following this consultation along with its significant additional impact assessments will be submitted to the Planning Inspectorate in January 2021. We do not believe that there is sufficient time in the process for the Applicant to adequately consider the responses received to this consultation and incorporate these into the revised detailed information for that Application to be made in January. We are also concerned about the timescales for further modelling and assessment work to be conducted by the Applicant (for example, with regard to potential impacts on coastal processes) and for statutory and non-statutory consultees to adequately review and respond to the significant additional impact assessments that will be provided at that time. We are therefore concerned there is insufficient time available to conduct this process adequately to ensure PINS and Interested Parties have adequate information to assess the Application at the start of the Examination.

Paragraph 1.1.6 proposes the establishment of an independent environmental trust to oversee the re-wilding and biodiversity of the Sizewell estate. We would need to understand this proposal in more detail. Plans for governance, implementation and ongoing financing will be required and we note that in order to be of most benefit to Suffolk's wildlife, plans for the estate should be targeted at declining locally-relevant habitats and species and should aim to increase connectivity with the wider landscape. We consider that this may sit better under EDF's corporate environmental and community responsibilities and other instruments would be more appropriate to address the impacts of the Sizewell C project. There is a need to ensure that legal requirements regarding protected sites and species are not compromised and that this aspiration is providing benefits over

¹Concerns relating to likely adequacy of application documentation. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-Advice-00133-1-RSPB%20SWT%20letter%20to%20PINS%20re%20SzC.pdf>

and above statutory requirements. We also request clarification of how this links in with the approach to biodiversity net gain.

2. Comments on the proposed changes to the Freight Management Strategy

2.1 Increase in the frequency of freight train movements to facilitate bulk material imports by rail

Paragraph 3.2.8 notes that additional trains overnight may travel either to the construction area via the green rail route or stop at Land East of Eastlands Industrial Estate (LEEIE). From an ecological viewpoint, the worst-case scenario (WCS) for noise modelling should be based on trains continuing to the temporary construction area due to its proximity to designated sites and sensitive species.

Additional trains to the construction area overnight have the potential to significantly increase disturbance to bats and to sensitive bird species of the Minsmere-Walberswick protected sites² and Sizewell Marshes SSSI. Based on the proposal to add two (or four) train movements overnight and the associated unloading and shunting required (it appears from Table 3.2, page 32, that this could be for up to two years) it appears that significant additional noise could be created at night when background noise is relatively low.

Table 3.5 shows the preliminary environmental information for the additional rail movements. This table only shows impacts on residential and other human receptors and therefore does not cover the expected noise and vibration arising from train movements and unloading within the temporary construction area (Appendix 1, paragraph 1.1.3 acknowledges that this has not yet been reassessed). Appendix 1 expands somewhat on the information presented in Table 3.5 but again does not include any reference to ecological receptors.

Paragraph 3.2.12 also notes that discussions are continuing with regard to the potential to increase the payload of each train. If changes are made, this should again be taken into account in the noise modelling due to the potential for increased noise levels (or a longer duration of elevated noise levels) during the unloading of each train.

Any increase in noise levels or duration from additional trains and any associated activities resulting from this must be included in revised noise modelling to inform both the Habitat Regulations Assessment (HRA) and Environmental Impact Assessment (EIA) and for the consideration and design of necessary mitigation. These details are required to enable review of the relative ecological impacts of the proposed changes to the freight management strategy.

2.2 Enhancement of the permanent Beach Landing Facility (BLF) and options for a new temporary BLF facility to facilitate material imports by sea

2.2.1 Impacts on coastal processes

We consider that there are four potential sources of impact on coastal geomorphology within the revised proposals:

1. re-profiling of seabed between deliveries to the permanent BLF (paragraph 3.3.5);

² These are the Minsmere to Walberswick Special Protection Area (SPA), the Minsmere/Walberswick Heaths and Marshes Special Area of Conservation (SAC), the Minsmere/Walberswick Heaths and Marshes Ramsar site and the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI).

2. permanent works to the seabed (the addition of 'grillage') at the permanent BLF (paragraph 3.3.10 & 11);
3. enhancement to the permanent BLF structure by increasing its length (paragraph 3.3.12); and
4. provision of additional temporary BLF (options 1-4)

Without a full assessment of the coastal geomorphological impact of the four options for the additional BLF we are unable to comment on the relative merits of each proposal. Table 3.7 explains that temporary BLF Options 1,2 and 3 have potential for moderate effects on the inner bars and the beach. Option 3 has a large number of barges docking per year, potentially with one barge present all of the time which is likely to lead to a moderate (significant) effect on the outer bar. Option 4 is claimed to have smaller impacts than options 1, 2 and 3, although would involve the installation of additional pier piles and self-elevating platforms. Therefore, as an additional structure would apparently increase the likelihood of impacts on coastal geomorphology, on the basis of the currently available information, we cannot support the proposed additional temporary BLF.

We agree that there is a need for appropriate modelling and assessment of the potential impact of the proposed changes to the permanent BLF and the additional temporary options on coastal processes. We also assume there is a need to include different temporary BLF options along with the permanent structure in the modelling to understand differences between the options and synergistic effects with the permanent structure. However, we are seriously concerned that there is insufficient time available prior to commencement of the Examination to undertake appropriate modelling and expert stakeholder evaluation.

2.2.2 Impacts on marine ecology

Paragraph 3.3.3. notes that barges will be loaded at a transhipment port. To enable an adequate assessment, the location of the transhipment port needs to be identified. If it lies within or requires movements through the Outer Thames SPA, this requires assessment of the potential impact of increased vessel movements within the SPA and potential for displacement of non-breeding red-throated divers.

We note that the annual "campaign" period during which sea conditions make operation of the BLFs possible was originally defined as 1st April – 31st October. Paragraph 3.3.30 indicates that the campaign may be extended to include deliveries in the winter months (dependent on the BLF option chosen). If the campaign is extended, this has the potential to cause further lighting and noise related disturbance to non-breeding red-throated diver of the Outer Thames SPA and must be considered within the HRA. Should it be considered that it is in principle possible to avoid deliveries during the winter months, we are still concerned that it would not be possible to fully avoid this risk without a consent condition precluding this, given that the viability of daily movements will be affected by tides and weather. In either case, a realistic WCS must be assessed.

Paragraph 3.3.31 states that all the temporary BLF options have the capacity to operate during the night as well as the day. Night-time use will require lighting of the temporary BLF and conveyor and we assume that this would be difficult to screen (although we welcome the intention to minimise light spill noted in paragraph 3.3.34). This along with the noise associated with operation of the enhanced BLF and the additional temporary BLF will require assessment for potential impacts on marine ecology and particularly species of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA.

Observations of red-throated diver from Thorpeness³ illustrate that this species can have large roost movements in the early morning and suggest that the birds move from roosting to feeding areas in relation to tide. These indicate a need to understand the diurnal movements of red-throated diver given the need to assess impacts at night as well as daytime. Likewise, the indication that vessel movements will be influenced by tides and weather introduces a need to understand the impacts of tide and weather on the red-throated diver population to be able to adequately assess impacts.

Paragraph 3.3.21 explains that the capacities presented for the BLF options are initial estimates and that actual capacities (and hence number of potential deliveries) may be greater. Whilst we understand the reasons for presenting these figures in this consultation, the WCS from an environmental standpoint (in terms of disturbance impacts on marine species and impacts on coastal processes) is the maximum capacity and greatest daily and seasonal duration of each option, and hence this should be used as the basis for the environmental assessments.

Paragraph 1.2.5 in Appendix 2 suggests that the increase in vessel traffic arising from the changes to the permanent BLF and the addition of the temporary BLF will not give rise to any significant environmental effects. No evidence is presented to justify this conclusion. We consider that assessment of the effects of displacement arising from vessel movements on red-throated divers from the Outer Thames SPA should be carried out following the standard methodologies used for offshore windfarm and cable route assessments and more detailed consideration of potential mortality (through increased density-dependent mortality elsewhere in the SPA) is needed.

Table 3.7 sets out the preliminary environmental information for the enhanced and temporary BLFs. The marine ecology section suggests that, for both the enhanced and temporary BLFs, impacts will be no worse than the original assessment. Given that this section also explains that there will be increases in suspended sediment, noise, lighting and physical disturbance, we cannot agree with the conclusions that impacts will be of no greater significance than those of the original assessment. These conclusions will require further evidence and justification.

Paragraph 1.3.1 in Appendix 2 explains that dredging may use a backhoe method which could result in increased levels of suspended sediment affecting a larger area when compared with the original proposals. The potential for this to affect foraging birds and their prey species should be assessed.

The Habitats Regulations Assessment section of Table 3.7 and section 1.3 of Appendix 2 provide slightly more information regarding the potential effects of the BLFs on features of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA. However, in order to understand the full potential impacts of the proposed BLF options it will be necessary to understand the levels of noise and visual disturbance from all elements of each option's construction, operation and maintenance, including the comparative frequency and duration of e.g. piling and dredging activities and the increased number of vessel movements (and their routes). The HRA should be updated to assess these potential effects on breeding little tern associated with the Minsmere-Walberswick SPA and Ramsar site and the populations of breeding little tern, breeding common tern and non-breeding red-throated diver associated with the Outer Thames Estuary SPA and on the marine bird qualifying features of the Alde-Ore Estuary SPA.

Insufficient information has been presented at this stage to draw conclusions as to the relative impacts of each of the BLF options and hence it is not possible to judge whether the potential changes to the proposals are acceptable in HRA terms or to express any preference for an option

³ Thurlow, D. 2009. Wintering Red-throated Divers, Thorpeness, Suffolk 2000/01 – 2008/09. Suffolk Birds 2008. Accessible online here: <https://issuu.com/suffolknaturalistsociety/docs/sb58a>

from an ecological standpoint. Whilst the need for further assessment is acknowledged, we are very concerned that this information has not been made available and therefore consultation responses cannot consider it nor include comments on choices for the change proposals to be submitted to the Planning Inspectorate. We fear that there is the potential for an environmentally damaging option to be proposed as a result.

2.2.3 Recreational impacts

Paragraph 2.2.18 explains the aim to keep beach access open during the construction and operation of the BLFs. This could reduce recreational displacement, but visitor experience alongside and beneath construction infrastructure will be very different to the current experience, and so it is not possible to assume that use of this route will continue at current levels.

Paragraph 3.3.14 proposes that the coast path will be redirected up and down the shoreline to facilitate construction. This requires an assessment of the potential to introduce more visits to the shoreline of RSPB Minsmere and the Minsmere – Walberswick protected sites if those visitors continue on this route northwards. The potential for additional use to increase impact on shingle flora, the dune frontage (and therefore the natural protection of the site) and ground-nesting birds such as ringed plover should be assessed. The assumption that disruption to this access from construction would be slight compared to the original Application remains to be proven and requires assessment to determine whether users would continue to visit walking alongside and underneath infrastructure associated with the BLFs.

We agree with the need for further assessment of the impact on recreational use as acknowledged in Table 3.7. Alongside the construction infrastructure, the removal of the shingle feature described in the terrestrial ecology section of Table 3.7 influences the experience for users and this needs to be considered in the evaluation of the experience.

Table 3.7 indicates that the temporary BLF may increase the significance of effects on visual receptors along the coast. Assessment of visual impacts on visitors to RSPB Minsmere will therefore also be required.

2.2.4 Other impacts

As noted in Table 3.7, any potential for additional noise and visual disturbance to terrestrial ecological receptors (in addition to marine/coastal impacts, as discussed above) will require assessment. As an example, consideration will need to be given to potential impacts on the roost flights of white-fronted geese between RSPB Minsmere and RSPB North Warren.

We query the accuracy of the conclusion that the temporary BLF options have no additional impact on the County Wildlife Site (CWS) shingle. Although this would be removed as part of the construction of the sea defences, the consultation document indicates the temporary BLF options may be operational up to 2030. We assume therefore that the CWS shingle would be removed until 2030. This does appear to be a significant impact on this vegetation community, which we understand to be of at least national importance. We query what evidence is available that seeds from shingle flora will remain fecund when stored in a large pile for up to 10 years? Also, given the apparent extended storage time, we query what measures are in place to prevent the piles from getting contaminated over this time with ruderal seeds such as dock and nettle?

Repeated reference is made to the northern mound in the discussions of the construction of the permanent BLF and sea defences. Despite reference to detailed designs being progressed, we have still yet to see any detailed designs of this element of the infrastructure which abuts the southern

boundary of RSPB Minsmere. We remain to be assured that this part of the development (including associated public access provision) will not encroach on land in our ownership or impact on the Minsmere – Walberswick protected sites.

3. Comments on the proposed changes to the Main Development Site

3.1 Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field

With reference to paragraph 2.3.18, we are concerned that the Sizewell B relocated facilities under Option 2 would again revert to parking on Pill Box Field, resulting in concerns as raised during the previous consultation. In particular, we are concerned about potential noise and light impacts on bats and Sizewell Marshes SSSI and direct SSSI loss and fragmentation due to the pedestrian crossing. All the options considered need to reduce operational noise and light spill onto the SSSI. Whilst it is welcomed that the height of the buildings is reduced to two storeys, it is important that the number of windows in the new buildings facing the SSSI is kept to a minimum due to light spill from them.

We query whether Option 2 would result in further SSSI loss due to the need for pedestrian access from the car park, which would appear to require routing straight across the SSSI?

Table 4.1 acknowledges that construction work associated with the Sizewell B relocated facilities will take place in close proximity to Sizewell Marshes SSSI. As above, the potential impacts on this site from construction noise and lighting should therefore be assessed.

Paragraph 4.2.4 explains that the proposed redesign of the landscaping scheme on Pillbox Field will include ecological enhancement and mitigation planting. We query whether there may be opportunities for enhancements to provide habitat for protected species of bats, birds, reptiles and invertebrates?

3.2 Change to certain parameter heights and activities on the main development site to facilitate the construction process

Table 4.2 discusses the effects of the increased parameter heights in the beach area associated with the marine tunnelling works and the temporary BLF on amenity and recreation. It acknowledges that some recreational users may be affected, and we agree that the significance of any resulting displacement of users will require further assessment, including for the purposes of HRA.

Assessment of visual impacts on visitors to RSPB Minsmere will also be required.

Paragraph 2.3.25 describes an additional stockpile area up to 15m in height. Fig 4.6 indicates that this will be adjacent to the proposed marsh harrier foraging habitat compensation site. Table 4.2 makes no reference to ecology but should acknowledge that assessment of potential noise and visual disturbance on marsh harriers using this site will be required to ensure that the site would continue to function as compensatory habitat.

With reference to paragraph 4.3.10, we remain concerned regarding the impact on barbastelle bats within Ash Wood due to the lack of buffer zones and the ingress of light and noise around 75% of the wood. The extension of the stockpile zone will increase this, and we strongly urge the inclusion of an appropriate buffer zone wide enough to fully mitigate these impacts within the wood and preserving connectivity to the main Upper Abbey Farm bridleway commuting route.

3.3 Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk

Despite repeatedly raising our concerns regarding potential for increased water levels within RSPB Minsmere, the assessments have to date not provided a satisfactory response. The apparent conclusion in the consultation document (paragraphs 2.3.26 and 4.4.3 – 5) that fluvial flood mitigation is required within the catchment adjacent to RSPB Minsmere suggests that there is a potential risk. Given these concerns, we welcome consideration of a potential fluvial flood mitigation area. However, we need to understand the modelling that has concluded that this location can function to adequately mitigate impacts arising from the main construction site as proposed in the consultation document. Therefore, we require further information to understand the justification for these proposals.

We support in principle the creation of wetland habitats and the opportunity to further mitigate for impacts on marsh harrier and impacts on the Sizewell Marshes SSSI. We note that the timing of the ground works for these wetland habitats should be compared to the timings of peak noise levels from the main construction area to assess whether the main marsh harrier compensation area could be detrimentally affected by increased noise levels from both sources. Paragraph 2.3.26 states that the proposed water storage area ‘provides high quality foraging habitat for marsh harrier during construction’. Noise contour modelling for this area is not presented here but it should be reviewed as this area will deliver little benefit to marsh harrier if noise levels exceed 70dB. We therefore remain concerned as to whether proposals for marsh harrier foraging habitat are appropriate and would need to see more detail to address these concerns.

We also believe that the proposals to address impacts on the Sizewell Marshes SSSI at this location are rather vague and it is not clear what contribution this would make. We are concerned that the suggestion to introduce wet woodland after the construction period will mean that functioning compensatory habitat would not be provided until several decades after the original loss.

We also request that more evidence is provided regarding the habitat quality that can be achieved and the construction methods required to create wetland habitats in this area, particularly relating to the ground works required to ensure that the area will be sufficiently wet. We are concerned that significantly steep slopes will be required and that this could limit the achievable habitat quality in this area.

Given the proximity of the proposed wetlands to the neighbouring Minsmere-Walberswick protected sites, potential impacts of the construction on the hydrology of these sites will require assessment. For example, with regard to the points in Table 4.3 regarding ecological impacts and IDB Drain no 7; it should be noted that these receptors are linked. The assessment in Table 4.3 does conclude that there would be ‘minor adverse changes’ to IDB Drain no 7. This drain potentially influences water levels on the Minsmere South Levels, as the ditch network in this area is gravity drained via IDB Drain no 7 to the Leiston Main Drain. Therefore, adverse impacts on IDB Drain no 7 could have impacts on water levels on the Minsmere South Levels and wider Minsmere-Walberswick protected sites and could have ecological impacts on species that rely on the current water level management regime.

3.4 Change to the SSSI crossing design to a single span bridge with embankments

Whilst the proposed bridge to cross Sizewell Marshes SSSI appears to be an improvement on the plans presented in the Application (from an ecological standpoint), we still consider that the bridge should be designed more sensitively as a three span bridge to further reduce SSSI loss from the

crossing and to provide greater connectivity for species/groups including invertebrates, water voles, otters and bats, thereby reducing the potential for fragmentation of populations.

We note the commitment in paragraph 4.5.8 to the provision of a ledge to allow otters to pass and the incorporation of bat roosts into the structure, however, detailed designs and full assessment of the potential impacts from the proposed bridge over the Sizewell Marshes SSSI are required. We also note that whilst the revised design may improve connectivity for some species (e.g. otters) compared to the design in the Application, some species (in particular, certain species of invertebrates) will still be significantly negatively affected by the proposals. Again, our preference would be for a three-span bridge which would result in higher light levels reaching the watercourse below and hence greater connectivity for all affected species.

Paragraph 4.5.7 notes that the revised design will reduce land-take from Sizewell Marshes SSSI by 450m². Whilst this intention is welcomed, the sections of SSSI remaining in the bridge section would be impacted during the construction period, potentially over a continuous period of a number of years and more evidence is required to demonstrate how well they could be restored in such close proximity to the causeway structure. We also still have concerns around the principle of the proposed loss of part of the Sizewell Marshes SSSI and its assessment against the tests set out in EN-1 (Overarching NPS for Energy). Our concerns include the justification for the proposed design to cross the Sizewell Marshes SSSI despite the higher land take from the SSSI than more sensitive designs.

Table 4.4 concludes that there are moderate adverse significant impacts on barbastelle bats. Whilst this might be the case regarding the SSSI crossing in isolation, when combined with impacts across the landscape the effect is likely to be highly significant. As a result of these single-issue conclusions, there continues to be an underestimate of overall cumulative impacts and hence insufficient provision of enhanced connectivity and other mitigation for bats.

Paragraph 4.5.10 states that the alignment of the SSSI crossing and the Sandlings Path will need to move eastwards. The current alignment of the path is relatively close to the RSPB Minsmere boundary and the Minsmere – Walberswick protected sites boundaries. We therefore require greater clarity on these proposals.

We welcome the potential for the revised design to reduce flood risk impact to Minsmere (noted in paragraph 4.5.12) and request that revised flood modelling is provided to quantify this. However, Table 4.4 notes that, with the inclusion of flood measures, the flood risk to Sizewell Belts is slightly raised. We query the nature of the flood relief measures as these do not appear to be explained in the document and note that any potential effect needs to be quantified and assessed as a result of revised flood risk modelling.

3.5 Revisions to tree retention on the main development site

We disagree with the conclusion in Table 4.5 of 'not significant' for fragmentation for bats, especially barbastelle, which as a species is known for its sensitivity to changes in its environment. Whilst the removal of 45 metres of hedge line and trees to the north of Kenton Hills is unlikely to be significant in itself, it will only exacerbate the highly significant impacts overall and further consideration and assessment is required.

3.6 Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall

We have some concerns regarding the impact of the temporary outfall on the beach and potential for impacts on coastal processes and recreational users. Based on the information in Table 4.6, it is unclear why it is proposed that a minor but adverse alteration of surface water flow does not require further assessment to confirm the conclusion and determine if mitigation is required.

3.7 Change to the sea defence to make the scheme more efficient and resilient to climate change

3.7.1 Temporary sea defence

Figure 4.18 presents too little detail on this option to enable us to understand the potential environmental impacts of the proposed change. The reason for the change is led by engineering detail relating to marine shafts and tunnelling works. It is not clear from the detail presented whether there could be environmental impacts that would suggest a different engineering solution should be considered. In particular, we query whether this change will result in additional loss to the Suffolk Shingle Beaches CWS and if so, how this loss will be offset? At this stage, we cannot reach a conclusion as to whether we support the reasons for the change based on the evidence provided.

3.7.2 Permanent sea defence

Raising the height of this feature and the subsequent need to move the toe of the defences seaward raises significant concerns with regard to coastal processes. Despite assurances in paragraphs 4.8.9 and 4.8.10 that design details have been progressed further, the consultation still only provides indicative details in Figure 4.19, so the concerns expressed in our Relevant Representations (RR-1059 (RSPB) and RR-1180 (SWT)) regarding the absence of detailed designs remain.

The justification given is that this change is required following updated UKCP18 sea level predictions and provides embedded mitigation, reducing reliance on secondary measures to alleviate coastal flood risk. As the revised proposal potentially introduces significantly more impact on coastal processes, and potentially affects shingle vegetation on the shore to the north (a feature of the Minsmere-Walberswick SAC), to the south (part of the Leiston-Aldeburgh SSSI) and in front of the station (Suffolk Shingle Beaches CWS), we would need to see more detail regarding the secondary measures to alleviate coastal flood risk alluded in paragraph 4.8.14 to understand the justification for the change more clearly.

We also do not agree with the Hard Coastal Defence Feature (HCDF) being assessed as a terrestrial feature, as it will become part of the coastline within the operational phase of the power station. We therefore consider that further assessment of the future impact of coastal processes and the potential to accelerate coastal change needs to be undertaken. We are also concerned about potential impacts on the Soft Coastal Defence Feature (SCDF) and the associated value of this feature for shingle flora.

3.8 Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss

Paragraph 2.3.38 discusses the need for additional fen meadow compensation. Whilst the provision of more SSSI compensatory habitat is welcome, the distance from the area of loss at Sizewell Marshes SSSI is of concern. Compensation sites should be as close to the lost habitats as possible and given the distance of Pakenham from Sizewell, there is a clear limitation of Pakenham in terms of compensation for the loss of the Sizewell Marshes SSSI. Consideration should be given to

RSPB and SWT Response to Sizewell C Consultation on Proposed Changes November – December 2020 The RSPB and Suffolk Wildlife Trust (SWT) have reviewed the consultation materials regarding the proposed changes to the Sizewell C Application and have prepared the following joint response to the proposals, using the headings and subheadings in the Consultation document and focusing on key areas of concern.

1. Comments on the Introduction Paragraph 1.1.4 describes the pre-application consultation carried out by the Applicant and how this was used to finalise the Application. We believe the need for this additional consultation on proposed changes following the Application confirms our concerns regarding the adequacy of the DCO Application, as raised in our previous letter to the Planning Inspectorate (PINS). Paragraph 1.1.7 and Section 1.4 describe the process for proposing changes to the Application before the Examination starts. We understand the formal change application following this consultation along with its significant additional impact assessments will be submitted to the Planning Inspectorate in January 2021. We do not believe that there is sufficient time in the process for the Applicant to adequately consider the responses received to this consultation and incorporate these into the revised detailed information for that Application to be made in January. We are also concerned about the timescales for further modelling and assessment work to be conducted by the Applicant (for example, with regard to potential impacts on coastal processes) and for statutory and non-statutory consultees to adequately review and respond to the significant additional impact assessments that will be provided at that time. We are therefore concerned there is insufficient time available to conduct this process adequately to ensure PINS and Interested Parties have adequate information to assess the Application at the start of the Examination. Paragraph 1.1.6 proposes the establishment of an independent environmental trust to oversee the re-wilding and biodiversity of the Sizewell estate. We would need to understand this proposal in more detail. Plans for governance, implementation and ongoing financing will be required and we note that in order to be of most benefit to Suffolk's wildlife, plans for the estate should be targeted at declining locally-relevant habitats and species and should aim to increase connectivity with the wider landscape. We consider that this may sit better under EDF's corporate environmental and community responsibilities and other instruments would be more appropriate to address the impacts of the Sizewell C project. There is a need to ensure that legal requirements regarding protected sites and species are not compromised and that this aspiration is providing benefits over 1 Concerns relating to likely adequacy of application documentation. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012Advice-00133-1-RSPB%20SWT%20letter%20to%20PINS%20re%20SzC.pdf> 1 and above statutory requirements. We also request clarification of how this links in with the approach to biodiversity net gain.

2. Comments on the proposed changes to the Freight Management Strategy 2.1 Increase in the frequency of freight train movements to facilitate bulk material imports by rail Paragraph 3.2.8 notes that additional trains overnight may travel either to the construction area via the green rail route or stop at Land East of Eastlands Industrial Estate (LEEIE). From an ecological viewpoint, the worst-case scenario (WCS) for noise modelling should be based on trains continuing to the temporary construction area due to its proximity to designated sites and sensitive species. Additional trains to the construction area overnight have the potential to significantly increase disturbance to bats and to sensitive bird species of the Minsmere-Walberswick protected sites and Sizewell Marshes SSSI. Based on the proposal to add two (or four) train movements overnight and the associated unloading and shunting required (it appears from Table 3.2, page 32, that this could be for up to two years) it appears that significant additional noise could be created at night when background noise is relatively low. Table 3.5 shows the preliminary environmental information for the additional rail movements. This table only shows impacts on residential and other human receptors and therefore does not cover the expected noise and vibration arising from train movements and unloading within the temporary construction area (Appendix 1, paragraph 1.1.3 acknowledges that this has not yet been reassessed). Appendix 1 expands somewhat on the information presented in Table 3.5 but again does not include any reference to ecological receptors. Paragraph 3.2.12 also notes that discussions are continuing with regard to the potential to increase the payload of each train. If changes are made, this should again be taken into account in the noise modelling due to the potential for increased noise levels (or a longer duration of elevated noise levels) during the unloading of each train. Any increase in noise levels or duration from additional trains and any associated activities resulting from this must be included in revised noise modelling to inform both the Habitat Regulations Assessment (HRA) and Environmental Impact Assessment (EIA) and for the consideration and design of necessary mitigation. These details are required to enable review of the relative ecological impacts of the proposed changes to the freight management strategy.

2.2 Enhancement of the permanent Beach Landing Facility (BLF) and options for a new temporary BLF facility to facilitate material imports by sea 2.2.1 Impacts on coastal processes We consider that there are four potential sources of impact on coastal geomorphology within the revised proposals: 1. re-profiling of seabed between deliveries to the permanent BLF (paragraph 3.3.5); 2 These are the Minsmere to

Walberswick Special Protection Area (SPA), the Minsmere/Walberswick Heaths and Marshes Special Area of Conservation (SAC), the Minsmere/Walberswick Heaths and Marshes Ramsar site and the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI). 2.2. permanent works to the seabed (the addition of a grillageTM) at the permanent BLF (paragraph 3.3.10 & 11); 3. enhancement to the permanent BLF structure by increasing its length (paragraph 3.3.12); and 4. provision of additional temporary BLF (options 1-4) Without a full assessment of the coastal geomorphological impact of the four options for the additional BLF we are unable to comment on the relative merits of each proposal. Table 3.7 explains that temporary BLF Options 1,2 and 3 have potential for moderate effects on the inner bars and the beach. Option 3 has a large number of barges docking per year, potentially with one barge present all of the time which is likely to lead to a moderate (significant) effect on the outer bar. Option 4 is claimed to have smaller impacts than options 1, 2 and 3, although would involve the installation of additional pier piles and self-elevating platforms. Therefore, as an additional structure would apparently increase the likelihood of impacts on coastal geomorphology, on the basis of the currently available information, we cannot support the proposed additional temporary BLF. We agree that there is a need for appropriate modelling and assessment of the potential impact of the proposed changes to the permanent BLF and the additional temporary options on coastal processes. We also assume there is a need to include different temporary BLF options along with the permanent structure in the modelling to understand differences between the options and synergistic effects with the permanent structure. However, we are seriously concerned that there is insufficient time available prior to commencement of the Examination to undertake appropriate modelling and expert stakeholder evaluation.

2.2.2 Impacts on marine ecology Paragraph 3.3.3. notes that barges will be loaded at a transshipment port. To enable an adequate assessment, the location of the transshipment port needs to be identified. If it lies within or requires movements through the Outer Thames SPA, this requires assessment of the potential impact of increased vessel movements within the SPA and potential for displacement of non-breeding redthroated divers. We note that the annual ‘campaign’ period during which sea conditions make operation of the BLFs possible was originally defined as 1 st April – 31 st October. Paragraph 3.3.30 indicates that the campaign may be extended to include deliveries in the winter months (dependent on the BLF option chosen). If the campaign is extended, this has the potential to cause further lighting and noise related disturbance to non-breeding red-throated diver of the Outer Thames SPA and must be considered within the HRA. Should it be considered that it is in principle possible to avoid deliveries during the winter months, we are still concerned that it would not be possible to fully avoid this risk without a consent condition precluding this, given that the viability of daily movements will be affected by tides and weather. In either case, a realistic WCS must be assessed. Paragraph 3.3.31 states that all the temporary BLF options have the capacity to operate during the night as well as the day. Night-time use will require lighting of the temporary BLF and conveyor and we assume that this would be difficult to screen (although we welcome the intention to minimise light spill noted in paragraph 3.3.34). This along with the noise associated with operation of the enhanced BLF and the additional temporary BLF will require assessment for potential impacts on marine ecology and particularly species of the Outer Thames Estuary SPA and MinsmereWalberswick SPA. Observations of red-throated diver from Thorpeness 3 illustrate that this species can have large roost movements in the early morning and suggest that the birds move from roosting to feeding areas in relation to tide. These indicate a need to understand the diurnal movements of red-throated diver given the need to assess impacts at night as well as daytime. Likewise, the indication that vessel movements will be influenced by tides and weather introduces a need to understand the impacts of tide and weather on the red-throated diver population to be able to adequately assess impacts. Paragraph 3.3.21 explains that the capacities presented for the BLF options are initial estimates and that actual capacities (and hence number of potential deliveries) may be greater. Whilst we understand the reasons for presenting these figures in this consultation, the WCS from an environmental standpoint (in terms of disturbance impacts on marine species and impacts on coastal processes) is the maximum capacity and greatest daily and seasonal duration of each option, and hence this should be used as the basis for the environmental assessments. Paragraph 1.2.5 in Appendix 2 suggests that the increase in vessel traffic arising from the changes to the permanent BLF and the addition of the temporary BLF will not give rise to any significant environmental effects. No evidence is presented to justify this conclusion. We consider that assessment of the effects of displacement arising from vessel movements on red-throated divers from the Outer Thames SPA should be carried out following the standard methodologies used for offshore windfarm and cable route assessments and more detailed consideration of potential mortality (through increased density-dependent mortality elsewhere in the SPA) is needed. Table 3.7 sets out the preliminary environmental information for the enhanced and temporary BLFs. The marine ecology section suggests that, for both the enhanced and temporary BLFs, impacts will be no worse than the original assessment. Given that this section also explains that there will be increases in suspended sediment, noise, lighting and physical disturbance, we cannot agree with the conclusions that impacts will be of no greater significance than those of the original assessment.

These conclusions will require further evidence and justification. Paragraph 1.3.1 in Appendix 2 explains that dredging may use a backhoe method which could result in increased levels of suspended sediment affecting a larger area when compared with the original proposals. The potential for this to affect foraging birds and their prey species should be assessed. The Habitats Regulations Assessment section of Table 3.7 and section 1.3 of Appendix 2 provide slightly more information regarding the potential effects of the BLFs on features of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA. However, in order to understand the full potential impacts of the proposed BLF options it will be necessary to understand the levels of noise and visual disturbance from all elements of each option's construction, operation and maintenance, including the comparative frequency and duration of e.g. piling and dredging activities and the increased number of vessel movements (and their routes). The HRA should be updated to assess these potential effects on breeding little tern associated with the Minsmere-Walberswick SPA and Ramsar site and the populations of breeding little tern, breeding common tern and non-breeding red-throated diver associated with the Outer Thames Estuary SPA and on the marine bird qualifying features of the Alde-Ore Estuary SPA. Insufficient information has been presented at this stage to draw conclusions as to the relative impacts of the each of the BLF options and hence it is not possible to judge whether the potential changes to the proposals are acceptable in HRA terms or to express any preference for an option 3 Thurlow, D. 2009. Wintering Red-throated Divers, Thorpeness, Suffolk 2000/01 – 2008/09. Suffolk Birds 2008. Accessible online here:

<https://issuu.com/suffolknaturalistsociety/docs/sb58a> from an ecological standpoint. Whilst the need for further assessment is acknowledged, we are very concerned that this information has not been made available and therefore consultation responses cannot consider it nor include comments on choices for the change proposals to be submitted to the Planning Inspectorate. We fear that there is the potential for an environmentally damaging option to be proposed as a result.

2.2.3 Recreational impacts Paragraph 2.2.18 explains the aim to keep beach access open during the construction and operation of the BLFs. This could reduce recreational displacement, but visitor experience alongside and beneath construction infrastructure will be very different to the current experience, and so it is not possible to assume that use of this route will continue at current levels. Paragraph 3.3.14 proposes that the coast path will be redirected up and down the shoreline to facilitate construction. This requires an assessment of the potential to introduce more visits to the shoreline of RSPB Minsmere and the Minsmere – Walberswick protected sites if those visitors continue on this route northwards. The potential for additional use to increase impact on shingle flora, the dune frontage (and therefore the natural protection of the site) and ground-nesting birds such as ringed plover should be assessed. The assumption that disruption to this access from construction would be slight compared to the original Application remains to be proven and requires assessment to determine whether users would continue to visit walking alongside and underneath infrastructure associated with the BLFs. We agree with the need for further assessment of the impact on recreational use as acknowledged in Table 3.7. Alongside the construction infrastructure, the removal of the shingle feature described in the terrestrial ecology section of Table 3.7 influences the experience for users and this needs to be considered in the evaluation of the experience. Table 3.7 indicates that the temporary BLF may increase the significance of effects on visual receptors along the coast. Assessment of visual impacts on visitors to RSPB Minsmere will therefore also be required.

2.2.4 Other impacts As noted in Table 3.7, any potential for additional noise and visual disturbance to terrestrial ecological receptors (in addition to marine/coastal impacts, as discussed above) will require assessment. As an example, consideration will need to be given to potential impacts on the roost flights of white-fronted geese between RSPB Minsmere and RSPB North Warren. We query the accuracy of the conclusion that the temporary BLF options have no additional impact on the County Wildlife Site (CWS) shingle. Although this would be removed as part of the construction of the sea defences, the consultation document indicates the temporary BLF options may be operational up to 2030. We assume therefore that the CWS shingle would be removed until 2030. This does appear to be a significant impact on this vegetation community, which we understand to be of at least national importance. We query what evidence is available that seeds from shingle flora will remain fecund when stored in a large pile for up to 10 years? Also, given the apparent extended storage time, we query what measures are in place to prevent the piles from getting contaminated over this time with ruderal seeds such as dock and nettle? Repeated reference is made to the northern mound in the discussions of the construction of the permanent BLF and sea defences. Despite reference to detailed designs being progressed, we have still yet to see any detailed designs of this element of the infrastructure which abuts the southern boundary of RSPB Minsmere. We remain to be assured that this part of the development (including associated public access provision) will not encroach on land in our ownership or impact on the Minsmere – Walberswick protected sites.

3. Comments on the proposed changes to the Main Development Site

3.1 Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field With reference to paragraph 2.3.18, we are concerned that the Sizewell B relocated facilities under Option 2 would again revert to parking on Pill Box Field, resulting in concerns as raised during the previous

consultation. In particular, we are concerned about potential noise and light impacts on bats and Sizewell Marshes SSSI and direct SSSI loss and fragmentation due to the pedestrian crossing. All the options considered need to reduce operational noise and light spill onto the SSSI. Whilst it is welcomed that the height of the buildings is reduced to two storeys, it is important that the number of windows in the new buildings facing the SSSI is kept to a minimum due to light spill from them. We query whether Option 2 would result in further SSSI loss due to the need for pedestrian access from the car park, which would appear to require routing straight across the SSSI? Table 4.1 acknowledges that construction work associated with the Sizewell B relocated facilities will take place in close proximity to Sizewell Marshes SSSI. As above, the potential impacts on this site from construction noise and lighting should therefore be assessed. Paragraph 4.2.4 explains that the proposed redesign of the landscaping scheme on Pillbox Field will include ecological enhancement and mitigation planting. We query whether there may be opportunities for enhancements to provide habitat for protected species of bats, birds, reptiles and invertebrates? 3.2 Change to certain parameter heights and activities on the main development site to facilitate the construction process Table 4.2 discusses the effects of the increased parameter heights in the beach area associated with the marine tunnelling works and the temporary BLF on amenity and recreation. It acknowledges that some recreational users may be affected, and we agree that the significance of any resulting displacement of users will require further assessment, including for the purposes of HRA. Assessment of visual impacts on visitors to RSPB Minsmere will also be required. Paragraph 2.3.25 describes an additional stockpile area up to 15m in height. Fig 4.6 indicates that this will be adjacent to the proposed marsh harrier foraging habitat compensation site. Table 4.2 makes no reference to ecology but should acknowledge that assessment of potential noise and visual disturbance on marsh harriers using this site will be required to ensure that the site would continue to function as compensatory habitat. With reference to paragraph 4.3.10, we remain concerned regarding the impact on barbastelle bats within Ash Wood due to the lack of buffer zones and the ingress of light and noise around 75% of the wood. The extension of the stockpile zone will increase this, and we strongly urge the inclusion of an appropriate buffer zone wide enough to fully mitigate these impacts within the wood and preserving connectivity to the main Upper Abbey Farm bridleway commuting route. 3.3 Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk Despite repeatedly raising our concerns regarding potential for increased water levels within RSPB Minsmere, the assessments have to date not provided a satisfactory response. The apparent conclusion in the consultation document (paragraphs 2.3.26 and 4.4.3 – 5) that fluvial flood mitigation is required within the catchment adjacent to RSPB Minsmere suggests that there is a potential risk. Given these concerns, we welcome consideration of a potential fluvial flood mitigation area. However, we need to understand the modelling that has concluded that this location can function to adequately mitigate impacts arising from the main construction site as proposed in the consultation document. Therefore, we require further information to understand the justification for these proposals. We support in principle the creation of wetland habitats and the opportunity to further mitigate for impacts on marsh harrier and impacts on the Sizewell Marshes SSSI. We note that the timing of the ground works for these wetland habitats should be compared to the timings of peak noise levels from the main construction area to assess whether the main marsh harrier compensation area could be detrimentally affected by increased noise levels from both sources. Paragraph 2.3.26 states that the proposed water storage area ‘provides high quality foraging habitat for marsh harrier during construction’. Noise contour modelling for this area is not presented here but it should be reviewed as this area will deliver little benefit to marsh harrier if noise levels exceed 70dB. We therefore remain concerned as to whether proposals for marsh harrier foraging habitat are appropriate and would need to see more detail to address these concerns. We also believe that the proposals to address impacts on the Sizewell Marshes SSSI at this location are rather vague and it is not clear what contribution this would make. We are concerned that the suggestion to introduce wet woodland after the construction period will mean that functioning compensatory habitat would not be provided until several decades after the original loss. We also request that more evidence is provided regarding the habitat quality that can be achieved and the construction methods required to create wetland habitats in this area, particularly relating to the ground works required to ensure that the area will be sufficiently wet. We are concerned that significantly steep slopes will be required and that this could limit the achievable habitat quality in this area. Given the proximity of the proposed wetlands to the neighbouring Minsmere-Walberswick protected sites, potential impacts of the construction on the hydrology of these sites will require assessment. For example, with regard to the points in Table 4.3 regarding ecological impacts and IDB Drain no 7; it should be noted that these receptors are linked. The assessment in Table 4.3 does conclude that there would be ‘minor adverse changes’ to IDB Drain no 7. This drain potentially influences water levels on the Minsmere South Levels, as the ditch network in this area is gravity drained via IDB Drain no 7 to the Leiston Main Drain. Therefore, adverse impacts on IDB Drain no 7 could have impacts on water levels on the Minsmere South Levels and wider Minsmere-Walberswick protected sites and could have ecological impacts on species that rely on the current water

level management regime. 3.4 Change to the SSSI crossing design to a single span bridge with embankments Whilst the proposed bridge to cross Sizewell Marshes SSSI appears to be an improvement on the plans presented in the Application (from an ecological standpoint), we still consider that the bridge should be designed more sensitively as a three span bridge to further reduce SSSI loss from the crossing and to provide greater connectivity for species/groups including invertebrates, water voles, otters and bats, thereby reducing the potential for fragmentation of populations. We note the commitment in paragraph 4.5.8 to the provision of a ledge to allow otters to pass and the incorporation of bat roosts into the structure, however, detailed designs and full assessment of the potential impacts from the proposed bridge over the Sizewell Marshes SSSI are required. We also note that whilst the revised design may improve connectivity for some species (e.g. otters) compared to the design in the Application, some species (in particular, certain species of invertebrates) will still be significantly negatively affected by the proposals. Again, our preference would be for a three-span bridge which would result in higher light levels reaching the watercourse below and hence greater connectivity for all affected species. Paragraph 4.5.7 notes that the revised design will reduce land-take from Sizewell Marshes SSSI by 450m². Whilst this intention is welcomed, the sections of SSSI remaining in the bridge section would be impacted during the construction period, potentially over a continuous period of a number of years and more evidence is required to demonstrate how well they could be restored in such close proximity to the causeway structure. We also still have concerns around the principle of the proposed loss of part of the Sizewell Marshes SSSI and its assessment against the tests set out in EN1 (Overarching NPS for Energy). Our concerns include the justification for the proposed design to cross the Sizewell Marshes SSSI despite the higher land take from the SSSI than more sensitive designs. Table 4.4 concludes that there are moderate adverse significant impacts on barbastelle bats. Whilst this might be the case regarding the SSSI crossing in isolation, when combined with impacts across the landscape the effect is likely to be highly significant. As a result of these single-issue conclusions, there continues to be an underestimate of overall cumulative impacts and hence insufficient provision of enhanced connectivity and other mitigation for bats. Paragraph 4.5.10 states that the alignment of the SSSI crossing and the Sandlings Path will need to move eastwards. The current alignment of the path is relatively close to the RSPB Minsmere boundary and the Minsmere 'Walberswick protected sites boundaries. We therefore require greater clarity on these proposals. We welcome the potential for the revised design to reduce flood risk impact to Minsmere (noted in paragraph 4.5.12) and request that revised flood modelling is provided to quantify this. However, Table 4.4 notes that, with the inclusion of flood measures, the flood risk to Sizewell Belts is slightly raised. We query the nature of the flood relief measures as these do not appear to be explained in the document and note that any potential effect needs to be quantified and assessed as a result of revised flood risk modelling. 3.5 Revisions to tree retention on the main development site We disagree with the conclusion in Table 4.5 of 'not significant'™ for fragmentation for bats, especially barbastelle, which as a species is known for its sensitivity to changes in its environment. Whilst the removal of 45 metres of hedge line and trees to the north of Kenton Hills is unlikely to be significant in itself, it will only exacerbate the highly significant impacts overall and further consideration and assessment is required. 3.6 Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall We have some concerns regarding the impact of the temporary outfall on the beach and potential for impacts on coastal processes and recreational users. Based on the information in Table 4.6, it is unclear why it is proposed that a minor but adverse alteration of surface water flow does not require further assessment to confirm the conclusion and determine if mitigation is required. 3.7 Change to the sea defence to make the scheme more efficient and resilient to climate change 3.7.1 Temporary sea defence Figure 4.18 presents too little detail on this option to enable us to understand the potential environmental impacts of the proposed change. The reason for the change is led by engineering detail relating to marine shafts and tunnelling works. It is not clear from the detail presented whether there could be environmental impacts that would suggest a different engineering solution should be considered. In particular, we query whether this change will result in additional loss to the Suffolk Shingle Beaches CWS and if so, how this loss will be offset? At this stage, we cannot reach a conclusion as to whether we support the reasons for the change based on the evidence provided. 3.7.2 Permanent sea defence Raising the height of this feature and the subsequent need to move the toe of the defences seaward raises significant concerns with regard to coastal processes. Despite assurances in paragraphs 4.8.9 and 4.8.10 that design details have been progressed further, the consultation still only provides indicative details in Figure 4.19, so the concerns expressed in our Relevant Representations (RR-1059 (RSPB) and RR-1180 (SWT)) regarding the absence of detailed designs remain. The justification given is that this change is required following updated UKCP18 sea level predictions and provides embedded mitigation, reducing reliance on secondary measures to alleviate coastal flood risk. As the revised proposal potentially introduces significantly more impact on coastal processes, and potentially affects shingle vegetation on the shore to the north (a feature of the Minsmere-Walberswick SAC), to the south (part of the Leiston-Aldeburgh SSSI) and in front of the station (Suffolk Shingle Beaches CWS), we would need

to see more detail regarding the secondary measures to alleviate coastal flood risk alluded in paragraph 4.8.14 to understand the justification for the change more clearly. We also do not agree with the Hard Coastal Defence Feature (HCDF) being assessed as a terrestrial feature, as it will become part of the coastline within the operational phase of the power station. We therefore consider that further assessment of the future impact of coastal processes and the potential to accelerate coastal change needs to be undertaken. We are also concerned about potential impacts on the Soft Coastal Defence Feature (SCDF) and the associated value of this feature for shingle flora.

3.8 Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss Paragraph 2.3.38 discusses the need for additional fen meadow compensation. Whilst the provision of more SSSI compensatory habitat is welcome, the distance from the area of loss at Sizewell Marshes SSSI is of concern. Compensation sites should be as close to the lost habitats as possible and given the distance of Pakenham from Sizewell, there is a clear limitation of Pakenham in terms of compensation for the loss of the Sizewell Marshes SSSI. Consideration should be given to increasing the compensation ratio to take account of the distance of the compensation site from Sizewell Marshes SSSI. Compensation habitat should be functional before habitat loss occurs. We request evidence from similar schemes is provided to demonstrate it is feasible to successfully create species-rich fen/fen meadow habitat. We also request clarification of the next steps mentioned in paragraph 4.9.16 if it is found that it is not feasible to create this habitat. With regard to the plans to transfer green hay to the Pakenham site discussed in paragraph 4.4.9, in terms of ecological best practice these transfers should be from the Pakenham Meadows SSSI. We recommend surveys of existing fen meadow local to the compensation site, including Pakenham Meadows SSSI, to identify species (e.g. invertebrates) present locally and then target measures to encourage their colonisation of the newly created fen meadow habitat. The potential impacts of the proposed Pakenham Fen site on the features of the adjacent Pakenham Meadows SSSI need to be assessed. Ecological, groundwater and surface water surveys of the Pakenham Meadows SSSI should be undertaken to establish its condition before construction of the Pakenham compensation area. The SSSI should be monitored during and after construction to detect any potential impacts from groundwater and surface water changes on its features, allowing rapid deployment of mitigation measures should any changes occur.

4. Comments on the proposed changes to the Two Village Bypass 4.1 Extension of the Order Limits for works on the two village bypass, change to the public right of way around Walk Barn Farm and additional habitat mitigation proposals The continued lack of an innovatively designed green bridge is disappointing, despite being raised in previous consultations. The cutting provides an ideal location linking Foxburrow Wood CWS with the woodland to the west. The proposal would result in a small loss of woodland at the eastern end of Nuttery Belt. We recommend additional tree planting to strengthen wildlife corridors.

5. Comments on the proposed changes to Sizewell Link Road 5.1 Extension to and reduction of the Order Limits for works on the Sizewell link road Sizewell Link Road remains a concern with regard the impact on barbastelle bats. In our view, the importance of this area to the wider barbastelle population has been underestimated and some of the planting proposed is unlikely to mitigate the fragmentation caused to such a sensitive species. Additional short lengths of hedgerow and approximately 0.17ha of additional woodland would be permanently lost as a result of the proposed changes. This additional habitat loss further reduces habitat connectivity for bats and birds. We recommend additional hedgerow and tree planting to strengthen wildlife corridors.

increasing the compensation ratio to take account of the distance of the compensation site from Sizewell Marshes SSSI.

Compensation habitat should be functional before habitat loss occurs. We request evidence from similar schemes is provided to demonstrate it is feasible to successfully create species-rich fen/fen meadow habitat. We also request clarification of the next steps mentioned in paragraph 4.9.16 if it is found that it is not feasible to create this habitat.

With regard to the plans to transfer green hay to the Pakenham site discussed in paragraph 4.4.9, in terms of ecological best practice these transfers should be from the Pakenham Meadows SSSI.

We recommend surveys of existing fen meadow local to the compensation site, including Pakenham Meadows SSSI, to identify species (e.g. invertebrates) present locally and then target measures to encourage their colonisation of the newly created fen meadow habitat.

The potential impacts of the proposed Pakenham Fen site on the features of the adjacent Pakenham Meadows SSSI need to be assessed. Ecological, groundwater and surface water surveys of the Pakenham Meadows SSSI should be undertaken to establish its condition before construction of the Pakenham compensation area. The SSSI should be monitored during and after construction to detect any potential impacts from groundwater and surface water changes on its features, allowing rapid deployment of mitigation measures should any changes occur.

4. Comments on the proposed changes to the Two Village Bypass

4.1 Extension of the Order Limits for works on the two village bypass, change to the public right of way around Walk Barn Farm and additional habitat mitigation proposals

The continued lack of an innovatively designed green bridge is disappointing, despite being raised in previous consultations. The cutting provides an ideal location linking Foxburrow Wood CWS with the woodland to the west.

The proposal would result in a small loss of woodland at the eastern end of Nuttery Belt. We recommend additional tree planting to strengthen wildlife corridors.

5. Comments on the proposed changes to Sizewell Link Road

5.1 Extension to and reduction of the Order Limits for works on the Sizewell link road

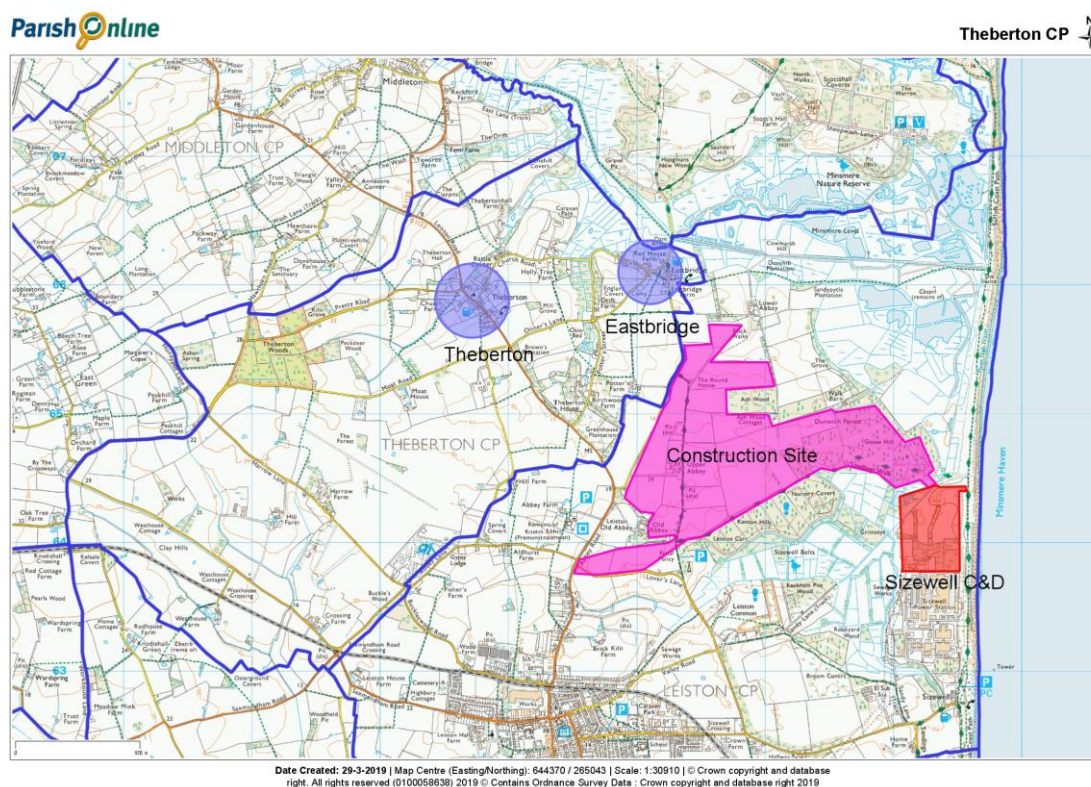
Sizewell Link Road remains a concern with regard the impact on barbastelle bats. In our view, the importance of this area to the wider barbastelle population has been underestimated and some of the planting proposed is unlikely to mitigate the fragmentation caused to such a sensitive species.

Additional short lengths of hedgerow and approximately 0.17ha of additional woodland would be permanently lost as a result of the proposed changes. This additional habitat loss further reduces habitat connectivity for bats and birds. We recommend additional hedgerow and tree planting to strengthen wildlife corridors.

EDF ENERGY - SIZEWELL C - INTRA-EXAMINATION CONSULTATION

RESPONSE FROM THEBERTON AND EASTBRIDGE PARISH COUNCIL (TEPC)

Introduction



Theberton

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) large twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village entrance sign. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community and surrounding areas.

Eastbridge

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders the Minsmere River which cuts through an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is also the location of RSPB Minsmere Reserve. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via National Trust's Dunwich Coastguards Cottages.

Both villages are chiefly agricultural, and people live there historically or by choice for the tranquility, dark skies, and the proximity to the Suffolk Heritage Coast. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Summary

- 1.1 **This Intra-Examination Consultation (IEC) response should be seen as an extension to our four pre-application consultation responses and Relevant Representation. Where previous responses reference, reject or support proposals/options presented by EDF and additional options are presented in this consultation, our support or otherwise for the newly presented options do not negate our prior support for previous options or change our view that in many cases, insufficient assessment and justifications have been provided by EDF for the progression of their preferred option or proposal.**
- 1.2 TEPC is, once again, disappointed that EDF have submitted this extremely late IEC only days after the s56 consultation finished. It includes significant changes and proposals that must have been prepared well in advance of the start of the s56 consultation and most likely in advance of the submission of the Development Consent Order (DCO). Such total disregard for the impact upon local communities, local and statutory authorities of yet another consultation after submitting its 50,000 page-plus DCO application can only be seen as evidence that EDF are incapable of planning such a massive project in such a relatively remote location with inadequate infrastructure, eroding coastline and totally surrounded by rare designated and sensitive habitats.
- 1.3 To make matters worse, apart from some clear changes in land requirements for associated developments such as Sizewell Link Road (SLR), Two Villages Bypass, and Park and Rides etc., other proposals are short on detail and consequently not possible to assess properly because of a lack of plans, supporting information and confidence that some of the options presented (e.g., Sizewell B Facilities Hybrid Relocation and increases in rail delivery) can even be delivered.
- 1.4 In the case of the temporary Beach Landing Facility, we are presented with four options which should not be options at all. If EDF are to remove as many as possible HGVs from the roads and maximise rail and sea usage, EDF should be making optional proposals which can achieve that objective with minimum coastal impact.
- 1.5 As far as the rail options are concerned, we continue to be disappointed that insufficient confidence can be applied to these changes after eight years of planning and consultations. EDF have had plenty of time to generate a plan with Network Rail that provides certainty as to what is possible and yet in Network Rail's Relevant Representation, they still cite lack of clarity on EDF's proposals as a reason for being unable to reach any sort of conclusion.
- 1.6 The new proposal for a single span bridge crossing of the SSSI still requires a significant loss of SSSI land. Whilst the splayed eastern entrance and increased width, of what is arguably still a culvert, will reduce the length of the covered portion east to west but will still result in a large area of darkened land beneath the bridge which will end up barren and a barrier to many species. Previous consultation bridge options were of a more classic pillar design with significantly more open area with light penetration which this adjusted causeway/culvert proposal simply does not provide.
- 1.7 We remain concerned that the environmental impacts associated with such a large development between two significant Sites of Special Scientific Interest and a construction site that will split the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in two, for at least 10-12 years, are not justifiable.

- 1.8 Additional habitat compensation and mitigation sites are in the main disconnected from the existing Minsmere and Sizewell habitats and some will not be available and functional prior to the proposed commencement of the project. In the case of replacement Fen Meadow, Wet Woodland and M22 habitat, it is not clear that these can be created at these remote sites or that they will be sustainable in the long term and thus must be seen as inadequate to fulfil obligations under habitat regulations and planning law.
- 1.9 Aldhurst Farm is overly relied upon as compensation for losses in the Sizewell Marsh SSSI and the fact that it is inadequately connected to the SSSI, across Lovers Lane, further reduces its compensatory value.
- 1.10 Despite proposals;
 - (a) to further reduce one pylon height
 - (b) the still incomplete hard coastal defence feature (HCDF) plans
 - (c) the proposal to raise the HCDF height yet further resulting a more easterly overall platform footprint
 - (d) the highly constrained nature of the platform site

it remains obvious that the attempt to squeeze two nuclear reactors on this site is inappropriate.

The 32-hectare platform compared to 45 hectares at Hinkley Point and an understanding in National Policy Statement EN-6 that single reactor site would require approximately 30 hectares only go to reinforce the case for reducing the site to a single EPR installation.

- 1.11 It remains our opinion that the SLR proposal is in the wrong place, does not relieve impacts placed upon the residents, farmers, sensitive buildings and businesses along its length. It closes roads and interrupts public rights of way (PROW). It also has limited use post construction as the road runs parallel to the existing B1122. We again state that a relief road that has minimal impact, such as the D2, or W from Stage 3 documents, offers reduced impact, shorter journeys for ~80% of traffic coming from the south and a positive legacy for Sizewell, Leiston, Yoxford, Middleton and Theberton.
- 1.12 We have become increasingly aware that despite all the attempts to reduce HGV traffic to the site, traffic in the early years along the B1122 cannot be reduced and is now at a level that is as high as the levels suggested should EDF succeed in reducing HGV traffic through additional rail and sea deliveries for bulk materials by the maximum contained within this highly aspirational document. The schedule for starting work on the SLR needs to be advanced or work on site should be delayed until such time as the SLR is operational.
- 1.13 The uncertainty with which many of these plans are being presented for consultation do not give any level of confidence that EDF are anywhere close to being ready to provide a properly considered plan for examination by PINS let alone consult with local authorities, other statutory authorities and the affected public.

2. Environment

- 2.1 We remain concerned that no evidence has been presented regarding the areas on EDF Energy Estate that have already been set aside to acid grassland of increased Marsh Harrier foraging. The reduction of three potential sites to one at Westleton, has no supporting evidence that this will accomplish the mitigation task associated with the loss of foraging in the Sizewell Marsh area. The existing areas on EDF Energy Estate are very close to the sites for the borrow pits and spoil heaps. Any potential mitigation is therefore unlikely to be as successful during construction operations as now, when no construction works are in operation.
- 2.2 Whilst additional Fen Meadow compensation land at Pakenham is included in this IEC, we are concerned that the overall compensation land will not be functional before the loss of the equivalent land at Sizewell. Also, the areas defined are remote and not connected to the area where the habitat loss is incurred. Habitats are not singular entities that are

independent of surrounding habitats. The implicit suggestion that such remote habitats can replace habitat loss within the diverse and rich environment at Sizewell Marsh is unsupportable. This comment applies equally to the compensation habitats at Benhall and Halesworth proposed in prior consultations. It is very difficult to create habitats such as fen meadow or wet woodland and there is a significant risk that these habitats will simply fail to establish or be successful in the long term. This is why compensatory habitats should always be created and functional before the habitat loss is incurred. This will be impossible in this case and as such the project should be delayed until the compensatory habitats are established successfully.

- 2.3 The move of the reservoir into the area next to the borrow pits and water management zone release the area next to Minsmere South Levels for flood defence and additional habitat creation. Reference is made to the area being potentially suitable, later, for creation of wet woodland. Given this is one of the habitat losses, it would make sense for this to be started as soon as practical once the land has been lowered and is suitable.
- 2.4 The reduction in the southern pylon height from 79m to 59m is noted. The fact that the original plan to have these cables in underground galleries cannot be achieved because of insufficient space on the constrained platform, reinforces the case for the pursuit of a reduction of this proposal to a single nuclear reactor where the adverse impacts and current deficiencies of this project can be resolved.

3. SSSI Causeway Crossing

- 3.1 The change of the current causeway/culvert structure with a 3.6m wide culvert to a “bridge” structure of 30m span and 70m overall east/west footprint does little to resolve the request for a proper bridge structure with minimal habitat damage. The change in slopes to the east and west will result in the tunnel length beneath the structure reducing from 70m to approximately 55m. This will still result in the space below the “bridge” section becoming mainly barren of any vegetation and the embankments at either end remain with the same footprint as the original causeway/culvert.
- 3.2 The original options in earlier consultations for a bridge were for open structures supported by columns allowing light to penetrate beneath the structure and avoid any significant loss of vegetated area beneath the crossing. This “bridge” structure is really a causeway with a wide culvert and still suffers from perpetuating a significant loss of SSSI with a 55m long dark space that will still cause significant habitat fragmentation except for a few species that are capable of traversing such a dark and vegetation free corridor.
- 3.3 With no details provided about the design and how the two embankments will affect groundwater flows between Sizewell Marsh and Minsmere South Levels, it is not clear what overall impacts this new structure will have on these interconnected areas and the fauna and flora that depend upon the hydrological stability of these habitats.
- 3.4 This new causeway with a wide culvert is a minor improvement but is still unacceptable as a method of crossing between Goose Hill and the SZC platform.
- 3.5 There is still a potential for coastal breach to occur north of the SZC site which will result in the breach travelling south and west along low land behind the sacrificial dune and reaching the SSSI crossing. No details are given about how the crossing would be protected should this occur and become a permanent incursion. Reliance upon potential future sediment accretion to protect the SSSI crossing and Minsmere South Levels is inappropriate. A proper columnar bridge structure would not require any such protection.

4. Managing Construction Materials

- 4.1 The addition of a new stockpile because of increased sea and rail deliveries and additional excavations to remove “incompetent crag formation” from the platform, referred to at a meeting with TEPC, is unfortunate considering the already large area given over to even larger spoil heaps and stockpiles.
- 4.2 We are still very concerned about the management and landscape visual impact of these stockpiles and spoil heaps, given the height of these features compared to the relatively flat topography of the area, as well as the clear potential for fugitive dust and sand on this dry and windy coast being blown onto adjacent designated habitats, residential and productive agricultural land.

5. Sizewell Link Road & Rail

- 5.1 We are dismayed by increased land requirements along the proposed Sizewell Link Road (SLR) which will result in further pressure on the viability of several family and small farms along the route. We are of the opinion that the SLR is an inappropriate solution to the high level of HGV and other traffic associated with the SZC development.
- 5.2 A road bridge should replace the pedestrian only bridge on Pretty Lane to avoid severance from Saxmundham, where a significant number of people in the area are registered for medical and dental services as well as it providing the primary access route to Saxmundham station. This is the main access route from Theberton and Eastbridge to Saxmundham. It is a wide lane suitable for two vehicles to pass compared to Moat Road which is a single-track lane with few passing places. Keeping Pretty Lane open will provide an alternate route of access for emergency vehicles, critical to public safety, given the vulnerability of our ageing population and the very serious risks of blockages on other available routes.
- 5.3 The Moat Road connection to the SLR will be a relatively hazardous junction for traffic turning right towards Leiston or traffic turning right towards Saxmundham. This junction will encourage a significant increase in traffic onto a single-track lane which is inappropriate.
- 5.4 We are still of the opinion that insufficient analysis and justifications have been given for rejecting other optional routes, in particular route W (also referred to as D2) which with some minor modifications could have provided a route with significantly less heritage, PRow and residential impacts whilst providing a positive legacy for Leiston and better access for both Sizewell and the proposed wind farm and interconnector developments in the Leiston area.
- 5.5 We note that Suffolk County Council as Highways Authority, still question the value of the SLR as a permanent addition to the road network as it runs parallel to the B1122 and remain supportive of route W as a positive legacy. Route W will also provide reductions in journey times, CO₂ and NOX emissions for the majority (~80%) of HGVs and Park & Ride busses from the south. The route would also be taken up by many of the LGV and other deliveries to the site as they are also most likely to be travelling up the A12 from Ipswich or the A14.
- 5.6 We note that whilst there appears to be a possibility of reduced HGV traffic should EDF and Network Rail be able to come to a satisfactory agreement on increasing the number of trains by one per day or two per day at peak, this is by no means certain. It is regrettable that we are essentially being consulted on a request that has been made over the past four consultations to reduce HGV traffic on the roads and yet even now this remains just a possibility and is not a definitive deliverable plan for consideration.

- 5.7 We note that the new transport strategy proposals will potentially include 6 days per week and extended hours of operation, and we object to these additional operations on the basis that noise and light pollution will affect all communities that live along the entire transport corridor from the A12/A14 junction to the site, as well as to those living along the rail route from Westerfield to Leiston and the site from whatever sources are being used for aggregate and other materials.

6. Temporary Beach Landing Facility

- 6.1 The four options presented are not really options at all for assessment by the public and consultees. The long-requested reduction in HGV traffic along with better utilization of rail and a request for delivery by sea have been made by a variety of consultees. We understand the reasons for the earlier rejection of the substantial jetty structure for environmental and coastal impact, given results from modelling and the impact on longshore drift experienced from jetty use during the Sizewell B development.
- 6.2 Any temporary Beach Landing Facility (BLF) needs to provide a significant and workable reduction in HGV traffic within the capacity of the construction site to stockpile delivered materials alongside whatever increase in capacity is achieved through increased rail deliveries. This must be achieved with little or no impact on coastal sediment transport either to the north or south of the site, in particular for Thorpeness and Aldeburgh where there are already significant coastal erosion issues. Any structures that result in sediment accretion at Sizewell in the predominantly north to south sediment transport regime is unacceptable.
- 6.3 As Option 4 would appear to provide the least disturbance to the near shore and beach environment, as it extends beyond the near-shore bar, this would appear to be the most suitable of the four options, but that must be subject to comments expressed above.
- 6.4 Reference, at a meeting on 9th December 2020 with TEPC, was made to the potential for additional stabilization piles that may be required for the platforms for winter stability. It is regrettable that the options described in the consultation remain incomplete and that impacts on the coast, as a result, are still unclear.
- 6.5 In the same meeting, referenced above, when asked whether it was possible that the platform based temporary BLF could end up being a simple jetty structure for hosting the conveyor system, it was confirmed that this possibility has not been ruled out. It would have been preferable that this option had been presented in this consultation rather than potentially having it sprung on consultees when the changes are submitted to the Planning Inspectorate or even later during the DCO Examination process.

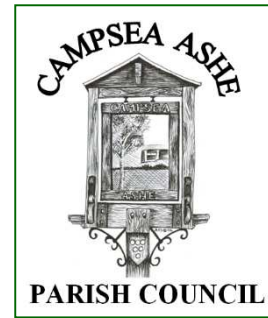
7. Coastal Defence Features

- 7.1 At all previous consultations and in the DCO application plans for the seaward defence of the site have been sketchy and lacking in sufficient detail. As a result, there has been insufficient information to assess the claims of suitability, longevity and claims of little effect on coastal processes.
- 7.2 This consultation does nothing to address that shortcoming. Although there is a proposal to raise the initial height of the defence crest from 10.2m to 14m, the sketch of the new Hard Coastal Defence Feature (HCDF) has no dimensions other than the height and the fact that the HCDF toe will be set at AOD. There is no view from above to show where the HCDF will sit relative to the existing coastal strip, sacrificial dune front and beach.
- 7.3 There is a second sketch that shows the adapted HCDF one meter higher at 15m with the new defence overlaying the initial defence referenced above and with an HCDF toe that extends below AOD but with no indication of how far below AOD it reaches. Its height relative to Mean Low Water Springs is needed to give any confidence that this adaptation will be competent as an HCDF for such a strategic installation as a nuclear power station.

- 7.4 Based on the initial additional height of the HCDF (14m) it is likely that the toe will be some 8m further east of the point originally shown in a photograph during the Stage 3 consultation. This would take the toe of the HCDF into the beach in front of the site and would require the destruction of the existing sacrificial dune and disturb the structure of the existing beach with unknowable impacts.
- 7.5 There is little information about how any Soft Coastal Defence Feature will work in this new configuration and comments within the consultation seem to doubt its effectiveness and value.
- 7.6 With a HCDF toe much further forward than previously proposed, the effect on sediment transport across the Sizewell frontage and beyond will be exacerbated.
- 7.7 The hard point that the HCDF and permanent BLF will present will also change how scouring across the whole of the Sizewell frontage behaves, potentially with significant effects for the SZC frontage as well as potentially to the frontages for SZB and SZA.
- 7.8 Sediment accretion to the north of the HCDF and BLF, referenced in the DCO application, is likely to increase once these structures are exposed but it is not clear when this might happen or why it is assumed that this will have no effect outside of the "Greater Sizewell Bay", when EDF made clear in a previous consultation that accretion at the Sizewell B jetty had effects further south at Thorpeness and Aldeburgh.
- 7.9 The DCO application suggested that the HCDF shown in sketches within those documents would likely be exposed in 2050. The current consultation suggests the HCDF would require adaptation in 2046, 12 years after the proposed beginning of power generation in 2034. However, if the HCDF has advanced 8m into the beach due to the raising of its height to 14m, HCDF exposure is likely to be even earlier than that, and because the initial HCDF toe is at AOD, it will be subject to daily tidal erosion beneath the rock armour. Adapting the HCDF when it is at AOD and subject to daily tides, is impractical. The plans, as have been provided over 5 consultations and the DCO application, are simply not credible and are thus unacceptable.

8. Conclusions

- 8.1 Theberton and Eastbridge Parish Council are not anti-nuclear. However, as currently proposed, we cannot support the development and have stated that TEPC now actively oppose the development. This consultation does nothing to change that decision and if anything reinforces the decision taken after the Stage 4 Consultation.
- 8.2 We do not find that the project is appropriately sized given the size of the platform available (32ha) and have continuing concerns regarding the adequacy and the long term deliverability of the hard coastal defence and possible effects on coastal erosion.
- 8.3 Reduction to a single nuclear reactor would enable adequate coastal defences to be proposed, reduce the impact on the surrounding AONB and designated habitats at Sizewell Marsh and Minsmere. It would also reduce the project length and impact on communities as a result.
- 8.4 We support SCC in their representations stating that the "benefits do not outweigh the disbenefits" of the SZC development and Natural England who stated that "in its current form the development should not be approved" and we note East Suffolk Council's neutral stance and also their significant concerns regarding the HCDF and coastal erosion.
- 8.5 We support the responses of RSPB, Suffolk Wildlife Trust, Minsmere Levels Stakeholders Group.



Campsea Ashe Parish Council's response to
Sizewell C – Consultation on Proposed changes
18th December 2020

Introduction

Campsea Ashe PC would like to express their disappointment in another 'consultation', which is bringing up proposals that parish and town councils have commented on in prior consultations, yet were not acted upon by EDF. We also agree with the widely expressed notion, that consultation should only be done upon proposals that have a certainty of being actually deliverable.

Campsea Ashe preferred a marine & rail led strategy in Stage 3&4 consultations as the East Suffolk Line would have gained improved infrastructure allowing the running of day time freight trains in addition to passenger transport and importantly also leaving a beneficial environmentally sound legacy. The integrated approach with up to five night time freight trains presented in the DCO increased the concerns of Campsea Ashe residents, as it is located close along the East Suffolk Line. The present consultation exacerbates those concerns, as more night time freight movement is proposed.

Campsea Ashe PC however strongly supports the maximum feasible beach landing (enhanced & temporary) facilities proposed.

Freight Management Issues

Although welcoming the attempt to reduce HGV movements by increasing rail and marine freight movements, Campsea Ashe PC does not envisage any beneficial impacts of the proposed changes on living standards of our residents. **In particular the increased night time rail movements would be detrimental and the estimated reduction in HGV movements is unlikely to significantly reduce vehicular movement on the eastern stretch of the B1078 (partly due to movements from/towards the Southern P&R).**

Campsea Ashe PC also remains gravely concerned, that traffic issues arising from the anticipated volume of cars, LGV's & HGV's will overwhelm the A12 in the Woodbridge/Melton and Hacheston/Marlesford areas, resulting in increased rat-running on an inadequate and at times already dangerously stretched rural network of roads and lanes.

The B1078 through Campsea Ashe and eastwards to Tunstall/Snape has several pinch points in and around Campsea Ashe, creating hazardous conditions even for cars passing. The anticipated increase of traffic, not just at times of A12 congestion, will make this road even more hazardous and subject Campsea Ashe residents not just to intolerable high levels of pollution. This route is used as a diversion if there are closures on the A12 between the junction with the B1078 and the junction with the A1094, **but the route will be incapable of coping with such level of diverted HGV traffic.**

The positioning of the southern P&R in Hacheston/Wickham Market will only exacerbate the situation.

These new proposals would not have any impact on reducing traffic during the first two years, before new roads and Park & Rides would be completed. During these "early years" 600 trucks per day, plus those for other Energy Projects, and all other Sizewell C traffic would use the current A12 and B1122. Sizewell C would still generate up to 12,000 extra vehicle journeys/day, massively increasing traffic on the A12, surrounding roads and making rat runs more likely. The A12 & A14 are already problematic; the Orwell Bridge, EDF's Freight management facility and new roundabouts will all increase the risk of delays.

Rail Issues

The Consultation proposes further train movements with the view that the negative impacts were previously overestimated and the incidences of noise pollution and vibration would not be increased beyond previous estimates. **With ca 70 homes within 150m of the railway line, any night freight movement will affect over half of the population of the village through noise and vibration, resulting most certainly in sleep disturbance.** The parameters provided for any mitigation are open to question. As such with limited mitigation proposals offered, Campsea Ashe PC cannot agree to such a proposal.

The information provided in the consultation does not provide sufficient detail and is difficult to understand for e.g., the choice of relevant values for significant observed adverse effect level (SOAEL) for noise disturbance and Vibration Dose Values (VDVs) for vibration required for mitigation.

There is also uncertainty of what can be achieved via mitigation. Proposals for engineering mitigation (continuous rail lines, quieter engines, speed) requires third party delivery. Noise bafflement mitigation (double/triple glazing and improved ventilation, fencing) may have a limited impact on the very few properties qualifying under the present measurements.

Mitigation measures must include continued monitoring, measuring and subsequent mitigation during the build period.

It is vital that assessments of real time noise and vibration impacts are used not just predictions before the process. Such measurements, although still open to differing

interpretations over impact, would be more accurate in identifying those properties affected adversely (and how badly).

Another mitigation to reduce sleep disturbance that could be used is to concentrate the rail movements at particular times at night by banning movements between certain hours.

Beach Landing Facility

Campsea Ashe supports in principle the maximum possible use (Option 4 & the improved BLF) of sea-based deliveries via the Beach Landing Facilities.

We are in full support of maximising marine deliveries, as we are fully aware of the inadequacies of the local road & rail network, which currently is incapable of sufficiently cope with the associated increased level of demand.

However, CA PC lacks the expertise to evaluate whether the proposal in itself is an environmentally (marine ecology & shore erosion impact) sound proposition and therefore would leave comment to independent stakeholders with the knowledge and expertise to comment.

Southern Park & Ride

Campsea Ashe is pleased yet perplexed that proposals from earlier consultations, such as the Northern Bund have been reinstated. However, serious concerns raised in previous consultations have not been addressed.

Campsea Ashe PC remains deeply concerned about the location of the site, both in terms of traffic impacts and actual topography.

The site is the most elevated in the area and the impact this will have on homes (area up to Campsea Ashe), is not conclusively addressed. Especially the issue of the still unspecified lighting design on the site and the destruction of dark skies, which has equally not been quantified.

Traffic impact on the area (as further outlined under Freight Management Issues), especially from 'rat-running' as well as unspecified amounts of sub-contractors in the area, will be considerable yet remain unquantified.

Geo fencing as a high-tech alternative for controlling traffic in the area should be applied, as should specific signage - a low-tech simple solution - around the A12 to discourage 'rat-running' on the B1078 (eastwards), which equally has not been addressed.

Summary

Whilst the increased BLF facilities would create an improvement on overall HGV movements, Campsea Ashe PC does not regard the improvement to be sufficient enough to erase our grave concerns about the project's impact on our region. CAPC are concerned in particular of the adverse impact of increased night time rail freight movements.

There is still no detail about traffic impact of the local supply chains, especially the significant threat of Base/Bentwaters Industrial Parks becoming an active part in the works for the Energy Projects (Sizewell & Scottish Renewables). This again will put

pressure on an already inadequate local road infrastructure, affecting not only Campsea Ashe, but Tunstall and Snape, as vehicles leave/access the A12 using the B1078 and other minor roads.

The cumulative impact of other major projects proposed and in progress in the region are not sufficiently taken into account, with major traffic issues going to affect the Martlesham/Woodbridge/Melton and Wickham Market/Marlesford area and hence increasing pressures on already strained infrastructure.

The impact of Martlesham Adastral Park, Friston Substation as well as all the off-site construction works of the SizewellC project are still not addressed and hence CA PC feels that SizewellC is too big a project for this rural area. The lasting and mainly irreversible negative impact on a rural/coastal environment and its AONB's with its important recreational and tourism related industry, outweigh the temporary positive effects it might produce.

Campsea Ashe PC

December 18th 2020

Dear Planning Inspectorate and Sizewell C,

Amended DCO application Sizewell C EN010012 – closing 18 Dec 2020

- 1.1 The amended DCO outlines the intention to reduce the impact of HGV traffic by 40% by increasing use of rail and sea transport of bulky materials. As a strategic intention Snape PC would welcome detailed exploration of both options. We do not see that reflected in the amended DCO. Our response at this point therefore would have to be qualified by the lack of detail in the amended DCO relating to the rail option and more particularly the marine landing facilities. Even at this late stage there are four potential marine options identified, all of which will have some degree of shoreline impact. It is of concern that once again there is very little research to support the assertion that what could be extensive maritime intrusions will have limited impact on surrounding shorelines both north and south. Our particular concern would be the impact on Slaughden, Orford Ness and the River Alde.
- 1.2 Snape PC was concerned that having allegedly explored the rail and marine options over a number of years and concluded that they were not feasible that the DCO now reflects them as options again without any rationale for the change other than asserting it is a response to consultation submissions. From the perspective of the PC and many other stakeholders the project has consistently been encouraged to fully explore rail and marine options. It was EDF/ Sizewell that dismissed them.
- 1.3 The original concerns were outlined in a response in January 2017, March 2019 and September 2019. Those concerns remain. The PC favoured a four village bypass rather than the two village bypass on the basis that it would reduce the impact of traffic congestion on the A12. The two village bypass means the road through Snape from Woodbridge (B1069) becomes effectively a four village bypass and the only alternative route if there is a blockage or heavy traffic on the A12 north of Marlsford.
- 1.4 The PC has previously reported the view that the various consultation exercises have been inadequate. The PC previously reflected that in the Update Statement of Community Consultation (P5) November 2016, “that EDF will attempt to coordinate its pre application consultation to avoid confusion and consultation fatigue” and the latest amended DCO only adds to the already complicated and demanding work to respond. The PC took part in discussions and briefing with stakeholder including the AONB, RSPB, Suffolk County Council and East Suffolk District Council and they appeared to share our concerns.
- 1.5 Additionally given the time that has passed from the first phase of consultation, submission of the DCO and this additional phase of consultation, Snape PC would ask the Applicant to provide assurance that they have taken into account changes that have occurred over that period? An example being the additional HGV and tractor traffic movements soon to be introduced to the A1094 at Rose Hill and the implications for traffic loading at the Friday Street junction from the construction of a crop store and weighbridge at that location.

Tim Beach

Chair Snape PC

WICKHAM MARKET PARISH COUNCIL



Chairman: Cllr Ivor French

Parish Clerk: Joanne Peters, [REDACTED]

www.onesuffolkwickhammarket.net

Sent by email: info@sizewellc.co.uk

Our Ref: WMPC/SWG Response to EDF SZC Stage 5

18th December 2020

Dear Sir/Madam

**Wickham Market Parish Council Sizewell Working Group Response to EDF
SZC Stage 5 Post DCO submission consultation**

Please note this is our formal response to EDF regarding Stage 5 consultation in respect to the proposed Sizewell C power station. We submitted comments to EDF on 20th September 2019 in relation to Stage 4. Our Relevant Representation was submitted to PINS on 21st September 2020 and can be found on the WMPC web site.

We have considered the key aspects of Stage 5 consultation and comment on those changes which affect Wickham Market and some additional points where we have concerns.

We understand that these proposals follow on from EDF's engagement with stakeholders, the public and local authorities, however we question why it has taken so long for EDF to consider introducing these changes in response to the concerns which have been expressed for some considerable time.

1. Increase in the frequency of freight train movements to facilitate bulk material imports by rail. We tentatively support any reduction in HGV movements on the A12 as being beneficial to the Wickham Market area and impacts on the A12 however we are aware that the extra rail freight movements could adversely impact other people/users including residents living near the line. Any additional rail use is still dependant on Network rail agreement. We have yet to see evidence that the stated number of 300 fewer HGV's will be deliverable.

2. Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea.

We understand that feasibility studies are still being undertaken to explore the viability of a longer permanent BLF and a new temporary one. These studies should have been done many years ago, but we were led to believe the options were not feasible. It will be important to understand whether the importation of materials by sea is feasible without damage to the ecological environment before tentative support could be given.

3. Change to the SSSI crossing design to a single span bridge with embankments.

This change must be beneficial, and the statutory agencies have advised on this approach previously. However, the introduction of a permanent road across the SSSI to the SZC site including

car parking, lighting and ancillary structures in the area will create detrimental adverse environmental impacts on this delicate ecosystem.

4. Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall.

WMPC are not in a position to provide comment

5. Change to the sea defence to make the scheme more efficient and resilient to climate change.

We cannot understand why the necessary engineering solutions were not been put forward at Stage 1. It would appear that the vulnerable coastal location and sea level rise have not been sufficiently considered previously. We are aware that many statutory authorities have significant technical concerns regarding coastal stability and solutions. We expect all necessary technical work and measures to be put in place to prevent a coastal and environmental disaster from occurring in future.

6. Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field.

We cannot support any development or planting on the Pill Box field. This is a totally inappropriate use of land within the AONB and will have a wider and cumulative detrimental impact on top of proposals to build various substantial structures on the land of Coronation Wood. We consider that the premature felling, without the necessary permits, of this mature mixed woodland, some 110 years old shows a cavalier approach to the environment of SZA, B and C. If SZC does not proceed the relocation of facilities should not be necessary.

7. Change to certain parameter heights and activities on the main development site to facilitate the construction process.

The possibility of changes creating further detrimental impacts within the area must be considered with care. We are already aware of the significant and harmful impacts which will occur should the relocated SZB facilities take place following the decimation of Coronation Wood.

8. Change to the location of the Water Resource Storage Area and the addition of flood mitigation measures to lower flood risk.

WMPC are not in a position to provide comment

9. Revisions to tree retention on the main development site.

WMPC are not able to provide comment

10. A new bridleway link between Aldhurst Farm and Kenton Hills.

WMPC are not in a position to provide comment

11. Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss.

Creation of fen meadow habitat in another part of Suffolk is not a satisfactory mitigation for habitat loss on the Suffolk Coast. This does not create biodiversity net gain.

12. Extension and reduction of the Order Limits for works on the main development site and related sites (fen meadow mitigation sites and marsh harrier improvement sites).

As for item 11.

13. Reinstatement of the 3m bund and other minor changes at the Southern Park and Ride site, including a minor reduction of the Order Limits.

WMPC raised the observation that the length of bund on the north west boundary to the SP&R site had been reduced in the DCO documentation. This was a change to the scheme proposed at Stages 1, 2, 3 and 4 for no apparent reason and with no justification in the LVIA. It is not clear why the bund

was removed at DCO submission stage. We are pleased that it has been re-instated, however other concerns regarding the limited impact assessment and a lack of landscape mitigation measures including long-term legacy of planting have not been addressed. We will continue to press for further improvements including those needed to deal with the harmful and significant impact of lighting.

We note in the paragraph 5.2.11 EDF have referred to other minor design changes, which are being explored. We look forward to seeing the result of these considerations and some significant detail relating to the scheme and its impacts.

With respect to the DCO order limits we have previously suggested that this be broadened to ensure sufficient space for landscape mitigation and enhancement of the site access road. This part of the site and the park and ride beyond will be very visible from WM in public views that have **not been assessed** within the LVIA.

14. Minor reductions to the Order Limits at the Northern Park and Ride site.

WMPC are not in a position to provide comment

15. Extension of the Order Limits for works on the Two Village Bypass, change to the public right of way around Walk Barn Farm and additional habitat mitigation proposals.

WMPC are not in a position to provide comment

16. Extension to and reduction of the Order Limits for works on the Sizewell Link Road.

WMPC are not in a position to provide comment

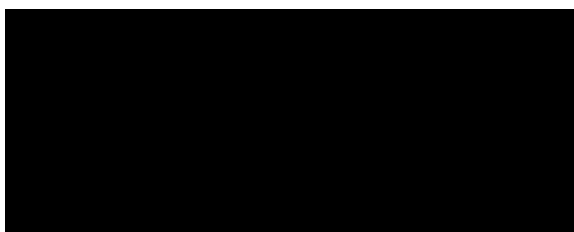
17. Minor reductions to the Order Limits for Yoxford Roundabout, the A12/B1119 junction at Saxmundham and the A1094/B1069 south of Knodishall.

WMPC are not able to provide detailed comment on proposal however we have noted that with respect to the further document and at junction A12/B1119 there are several trees including a large pollarded field maple on the north side of the junction which we would hope will be retained and protected.

3

Summary

In relation to the statement made by EDF in the Stage 4 consultation documents regarding liaison with the WMPC Neighbourhood Plan committee, a line of communication relating to traffic mitigation was subsequently established and meetings have taken place since December 2019. As a result of this EDF have begun to consider some potential traffic measures for the village. We anticipate some specific proposals which the public can be consulted on in the early part of 2021. We will also continue to press for additional significant design and landscape mitigation measures for the SP&R site itself. We do not believe that the changes in this Stage 5 consultation will reduce the many negative impacts of increased traffic numbers travelling through the village to and from the SP&R.



Ivor French
Chairman Wickham Market Parish Council

Cc Cllr A Nicol
Cc Cllr C Poulter

Sizewell C

Detailed review of the SZC Co. 30 day Public Consultation (18th November to 18th December 2020)

Introduction

Kelsale-cum-Carlton Parish Council [**KcCPC**] have participated fully in the Sizewell C Pre-Application Consultations and note the first 'Post DCO Application Consultation' marks the commencement of KcCPC's ninth year of responding to a plethora of; 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that have subsequently largely been; qualified out, significantly modified, re-badged or still remain subject to 'continuing analysis'.

As a consequence, KcCPC is disappointed that at 'one minute to midnight', EDF Energy and NNB Generation Company (SZC) Ltd [**SZC Co.**] seem determined to demonstrate further disdain for the prescribed process and have once again resorted to another ill-prepared engagement with the people and organisations in Suffolk that are amidst the most profound health and economic crisis visited on the county in living memory as a consequence of the pandemic.

Nevertheless, KcCPC have once more committed many hours of work to review the 174 page document, not only in the context of the previous Pre-Application Consultations, but also the huge volume of documents accompanying the DCO Application.

In making its assessment KcCPC note SZC Co. chose to make the DCO Application on 27th May 2020, despite much of the UK being under Covid-19 restrictions.

In so-doing, SZC Co. fully understood that the DCO Application might be accepted by the Planning Inspectorate for examination relatively speedily (actually occurring on 24th June 2020, again under Covid-19 restrictions) and thereby potentially requiring interested parties to make their Relevant Representations soon thereafter (again under Covid-19 restrictions). It subsequently transpired that Relevant Representations were accepted up to 30th September 2020, again under Covid-19 restrictions.

As is now clear, having set 'hares running', SZC Co. have chosen to further exploit the intense pressure on limited community resources to bring forward yet more 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that largely remain incomplete or lacking in; underpinning data, detailed analysis, necessary agreements, cumulative impact analysis, any appraisal of likely unforeseen consequences and their wider efficacy.

Nevertheless, KcCPC recognise that it must continue to participate in the prescribed process in order to try to safeguard the community of Kelsale-cum-Carlton from the worst excesses of SZC Co.

The following pages summarise KcCPC's review of the SZC Co. Consultation Document and form the basis of the Executive Summary and the contents therein.

A significant number of questions are raised by the Consultation Document and these are identified with a **Q** at the right hand side. The Council anticipate SZC Co. responding to these questions prior to the Planning Inspectorate commencing its examination.

Text in *blue italics* indicates the text is sourced from SZC Co.'s Consultation Document.

Note: The absence of a specific comment in this response does not imply, nor should it be interpreted as implying Kelsale-cum-Carlton Parish Council having no issues pertaining the paragraph where there are no views expressed.

CHAPTER 1. INTRODUCTION

1.1 Introduction

(1.1.2) It is noted that the capacity of the proposed Sizewell C power station is now confirmed at 3.34gw, clearing up the confusion created in the Stage 4 Pre-Application Consultation documentation.

(1.1.4) It is noted that whilst “...feedback from these consultations was considered throughout the development of the proposals and strategies for the Sizewell C Project and in the finalisation of the Application.” seemingly significant elements of the feedback were not considered important enough by SZC Co. to delay the DCO Application long enough for them to be fully considered, developed and incorporated into a robust DCO Application.

As a direct consequence residents, businesses and other agencies in Suffolk have to disentangle SZC Co. thinking from across the four previous consultations to understand the tapestry of the latest ‘possibilities’, ‘potential’, ‘opportunities’, ‘ideas’ and ‘initiatives’ being promulgated.


(1.1.5) Whilst in principle KcCPC welcomes progressive thinking that realises beneficial reductions in the level of adverse impacts on the “...local area and environment...”, it cannot unequivocally offer the same support for “...potential changes which will assist with the efficient construction of the project.” without fully understanding the conditions giving rise to, and the nature of the efficiencies being generated.

(1.1.6) Whilst in principle KcCPC would welcome the creation of “...an independent environmental Trust to manage the ongoing re-wilding and biodiversity of the growing Sizewell Estate.” it wishes to be clear on four things;

a) Re-wilding is a very long and hazardous path to replace/replicate hundreds of years of natural development. Consequently, the operational lifetime of Sizewell C seems wholly inadequate for financial support from SZC Co. The provision of an ‘in perpetuity endowment’ would seem far more proportionate.


b) KcCPC notes SZC Co. refer to a Trust as an ‘opportunity’, whereas as unconditional proposal, (assuming the project went ahead) appears more genuine and might be seen as far more compelling.

c) The phrase “We will update the community regularly on our progress.” seems inappropriate and alludes to something other than “...an independent environmental Trust” or perhaps it is just a poor portrayal of genuine intent?

d) Current Government thinking is very supportive of sustaining and increasing ecological assets and the avoidance of loss. Would SZC Co. not agree that they should review their DCO Application using this prism, prior to bringing forward any further changes? 


(1.1.8) In Table 2.1 of the Notification of Proposed Project Changes – PINS Reference Number: EN010012 SZC Co. identifies 14 changes. Yet in this paragraph various proposed Project changes have been unpacked, with the total proposed Project changes increasing to 18.

This seemingly arbitrary rearrangement gives rise to confusion and a lack of transparency in the messages being given to the Planning Inspectorate and the public at large.

Is this a deliberate strategy adopted by SZC Co. in order to; minimise the volume of proposed changes to the Planning Inspectorate whilst simultaneously portraying the maximum number beneficial (?) changes when communicating with consultees? 

Note: Reference to the Northern Park & Ride is not included in the “Table 2.1 Summary of proposed Project Changes” provided to the Planning Inspectorate (Pages 6 & 7 Notification of Proposed Project Changes – October 2020) but appears here.

1.4 Status of the Sizewell C Project


(1.4.1) Whilst it plays well to the gallery, isn't it disingenuous to proclaim *"SZC Co. has prioritised consultation since the early stages of the development of our proposals..."* as not to do so would have severely jeopardised the prospects of the project? 

(1.4.2) KcCPC note that *"Following the last stage of pre-application consultation, SZC Co. took time to consider feedback, further refine our proposals and... make sure that the Application reflected the proposals we considered necessary and appropriate for the construction... of Sizewell C."*


However, within a little over three months of agreeing the DCO be accepted for examination, SZC Co. sought agreement from the Planning Inspectorate to make further changes to their Application. It is noted that this timing adequately allowed SZC Co. to have had sight of not just the volume of Relevant Representations, but also their content.


Taking the foregoing into account, KcCPC is left with little alternative but to conclude that the undue haste with which SZC Co. has taken its most recent steps were, and remain an attempt to exploit prevailing circumstances and manufacture a situation where depleted resources are thoroughly tested in their resolve and ability to respond adequately within the timing and Covid-19 constraints.


This latest consultation exemplifies the situation described above and not only pressurises those wishing to respond, but also enables the Applicant to bring forward a further tranche of incomplete 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' for exploration (and/or potentially exploitation) within and presumably post, the examination phase.

(1.4.6) KcCPC note the intention of SZC Co. to submit a DCO Application 'change request' to the Planning Inspectorate in January 2021, doubtless with no prior visibility of those proposals having been given to stakeholders and other interested parties, unless compelled by the Planning Inspectorate? 


1.6 Process for seeking changes to the DCO Application

(1.6.1) KcCPC notes the all-pervasive use of the verb 'minimise' and questions how you can *"... further minimise..."*, insofar as 'to minimise' is to have reduced to the smallest amount or degree already? 

Would SZC Co. concede they should have more appropriately used 'reduced' and therefore have been able to have *"... further reduced..."*? 

That being the case, can they review the overuse and/or inappropriate use of 'minimise' and make suitable changes to the DCO Application, prior to seeking amendment for clarity? 

1.7 Structure of this consultation document

(1.7.1) KcCPC note the apparent interchangeability that some words have in SZC Co. Consultation Documents, yet none, (with the notable exception of 'proposals') are formalised in the References, Abbreviations and Defined Terms section. Are SZC Co. using the appropriate dictionary definitions of these undefined terms? 


For example:

Proposed – 'put forward for consideration'

Potential – 'capable of coming into being or action'

CHAPTER 2. PROJECT OVERVIEW

2.1 Introduction


(2.1.3) As identified in 1.7.1 (above) there is an apparent interchangeability that some words have in SZC Co. documents, yet none (with the notable exception of ‘proposals’) are formalised in the References, Abbreviations and Defined Terms section. For the avoidance of doubt, is SZC Co. using the appropriate dictionary definitions of these undefined terms? 

That is to say for example:

Proposed – ‘*put forward for consideration*’

Considered – ‘*contemplated... weighed the merits of... made after careful thought... etc.*’

Potential – ‘*capable of coming into being or action*’

It would seem unnecessary to preface much of the work put forward by SZC Co. in this consultation with such a breadth of unqualified terms or is this simply obfuscation? 

(2.1.4) As identified in 2.1.3 (above) this is exemplified in this paragraph where SZC Co. state “...*sets out further details of the changes to that strategy or site and sets out the relevant proposed development which was included in the Application, a description of the proposed change and an explanation of why the change is being considered or proposed. Where options are being consulted on, these are set out in the description of the change.*”

KcCPC is concerned that this style may imbue proposals so made with an undue degree of ambiguity that has been exploited in prior development proposals to the benefit of the applicant.

(2.1.5) KcCPC is concerned that as has happened in previous consultations, SZC Co. considers it appropriate to bring forward consultation material lacking complete Environmental Impact Assessments.

As is evident from previous attempts to deploy this strategy, it seldom provides a sound basis for informed decision making and often leads to further significant changes.

2.2 Freight Management Strategy

(2.2.2) KcCPC again note with incredulity SZC Co.’s previously made assertion that they had worked to find the “...*most sustainable freight management strategy and...include a comprehensive set of mitigation measures...*” despite having ruled out options without the fullest of examinations or seemingly on the basis of direct cost, rather than looking at the potential direct and indirect benefits as well (i.e. financial, environmental, social and welfare, etc.).

So, it is with some irony that SCZ Co. has chosen now to bring back previously dismissed options (i.e. extended BLF and more heavier rail movements).

More concerning is that after eight or more years, some of these proposals fall far short of an actionable plan. For example an extended BLF has huge potential hurdles to overcome in respect to coastal considerations and the potential geomorphological consequences of the existing DCO proposal, let alone those being currently consulted upon.

Likewise, it is clear that the proposed rail changes may have much wider impacts than those contemplated by the option in the DCO, alongside significantly more interdependencies and potentially more significant cumulative impacts.

(2.2.5) KcCPC notes *“The Application forecasts that approximately 40% of construction materials (by volume) would be moved by rail or sea.”* but makes no mention of the estimated tonnage applicable.

Tonnage is of particular importance in consideration of road hauled loads (HGV & LGV) and the potential cumulative impacts on road surface and bed in both the short, medium and long terms.

KcCPC also notes that with road hauled loads dropping to 60% there may be a logistical, environmental and economic challenge to the requirement and routing of the proposed Sizewell Link Road.

KcCPC will seek a full review of the current SLR route proposal (i.e. alternative route evaluations and Peer Review, undertaken by, or for the applicant) by the Planning Inspectorate based on 60% (by volume) of forecast HGV movements, plus LGV and bus movements

(Table 2.2 – Rail Movements) KcCPC have grave concerns that whilst considerable efforts are being promised to deliver *“Overnight movements along the East Suffolk line to and from hold points on the Saxmundham to Leiston branch line, and during the day movements along the Saxmundham to Leiston branch line from the hold points to and from the LEEIE, so that trains do not travel through Leiston at night.”* no consideration appears to be given to the impact of night movements on the not inconsiderable and similarly close proximity housing elsewhere (e.g. Saxmundham, Campsea Ash, etc.) and trackside leisure and residential parks (i.e. Whitearch Park).

KcCPC will seek to persuade the Planning Inspectorate to undertake a full review of the proposal for ‘Early Years’ night trains through to *“... hold points on the Saxmundham to Leiston Branch Line.”* and the inequality of treatment of trackside communities elsewhere in Coastal Suffolk (e.g. Saxmundham, Campsea Ash, etc.), compared to those residents in Leiston.

Similarly, KcCPC will seek a full review of the revised proposal for *“When the green rail route is operational: Up to 7 overnight movements and 1 daytime movement directly to and from the temporary construction area with the potential to also run trains on Saturdays. It may be possible to run a fifth train (two additional movements) for a short period.”* on the basis that the same consideration given to Leiston residents in the ‘Early Years’ above should be applied to trackside communities for the longer period of use by trains destined for the green rail route.

(Table 2.2 – HGV Movements) KcCPC have serious concerns that whilst the applicant indicates the proposed change has

“Potential to reduce to:

Typical day at peak: 250 HGVs (500 movements)

Busiest day: 350 HGVs (700 movements)

this seemingly only applies to HGV movements and continues to avoid any initiative to reduce LGV movements during the entire construction period.

Whilst LGV movements are widely regarded as less damaging to the road surface and bed, they are; more prevalent, arguably less well maintained, more polluting (per road tonne mile*) and more difficult to pro-actively manage.

*Road Transport Emission Factors (April 2020)

As a consequence of this and the experience of Hinkley Point C's construction thus far, in the event the Applicant obtains consent, KcCPC will seek to persuade the Planning Inspectorate that a binding agreement on the maximum daily permissible vehicle movements (by vehicle category, by route and construction phase) for the duration of construction should be implemented to safeguard the health and wellbeing of coastal Suffolk residents, maintain local businesses capabilities and offer increased environmental and amenity protections. Q

(Table 2.2 – Marine Movements) KcCPC have concerns that subject experts and commentators continue to express significant reservations in respect to the impact of the Applicant's proposals on the marine environment and a range of issues arising from increased Marine Movements, BLFs, etc.

Whilst the Council lack knowledge in these areas, it is persuaded that the previous Marine proposals along with the most recent changes require significantly more compelling evidence than the Applicant has been able to produce thus far.

Consequently, KcCPC is unable to offer any support for the amended Marine proposals contained in the *"The Sizewell C Project, Consultation Document, Consultation on Proposed Changes, November – December 2020"* without unqualified evidence being provided by the appropriate statutory authorities that; SZC Co.'s proposals represent no material risk to the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

(2.2.7) KcCPC notes with regret that *"...detailed site investigation work has continued to finalise materials volumes... work is continuing and will be confirmed at the same time as any changes arising from this consultation are formally submitted to the Planning Inspectorate."*, once again meaning another consultation concerning fundamental issues (e.g. confirmed materials and the consequent HGV movements required), are devoid of robust and meaningful data. Q

KcCPC regard this as undesirable and mirroring a constant theme throughout Pre Application, reinforcing the need for a binding agreement on the maximum daily permissible vehicle movements (as per comments on Table 2.2 above).


(2.2.8) Ignoring the remaining uncertainty of both increased rail movements and beach landing deliveries is it the intention of SZC Co. to undertake wider consultation regarding potential impacts further afield should *"...aggregates and other materials..."* come from sources that are *"...rail connected...or which could potentially allow shipment by sea."*? Q

KcCPC is aware that trans-boundary issues (e.g. regarding potential incidents with nuclear material at the planned Sizewell C site) have already elicited Relevant Representations from European mainland countries. Q

(2.2.9) Taking a lead from SZC Co.'s desire *"that goods should be moved sustainably wherever possible and that HGV numbers should be limited to those necessary for goods which cannot be moved by rail or sea."* what is the plan for deployment of hydrogen and/or electric powered commercial and private use vehicles during the construction phase? Will SZC Co. be active in installing more public access electric charging and hydrogen stations to facilitate this deployment? Q


(2.2.11) KcCPC note *"SZC Co. expects that it will be possible to reduce HGV movements to levels similar to those associated with the rail-led strategy."* and assume that the figures used in Stage 3 Table 5.1 are specifically: *Typical - 225 (450 movements) and Busiest - 450 (900 movements) between 07:30 and 23:00.*

If that is the case, KcCPC is concerned that SZC Co. are dismissive of the 50 daily movement adverse variance (Typical). However, the Council view the beneficial 200 variance as a welcome (but inadequate) step in making reductions to unacceptable HGV movement levels during the busiest periods. Q


(2.2.12) KcCPC is concerned that SZC Co. have failed to obtain rail freight capacity agreements with both the track operator and freight companies, advising instead that ‘*detailed discussions are continuing*’. It seems incredible that after more than eight years, fundamental dependencies have not been addressed and finalised, at least in the form of a conditional ‘heads of agreement’ or MOU’s. 

(2.2.13) KcCPC is gravely concerned that after more than eight years and several consultation rounds that SZC Co. have failed dismally to address fundamental issues in respect to the utilisation of the rail network, SZC Co. caveat their “...*proposals being consulted on...*” with “*It is possible that this work could conclude that the additional train capacity cannot be delivered, but SZC Co. is working...*”

Accordingly KcCPC is unable to offer support to the revised proposals contained in the “*The Sizewell C Project, Consultation Document, Consultation on Proposed Changes, November – December 2020*” as they amount to nothing more than obfuscation and continuing prevarication on critical issues likely to impact directly on Coastal Suffolk residents, their wellbeing and mental health.

(2.2.15 & 2.2.16) Whilst SZC Co. may be very clear what they are proposing in these paragraphs, they fall far short of precluding the use of “...*the permanent BLF...*” for both AIL and bulk material imports when it might be operationally beneficial and time/tidal range would permit it. 

(2.2.17) SZC Co. once again attempt to play down the impact of the proposed changes, moving from 50 beach landings (i.e. one per week), with a 100% increase to 100 per annum (i.e. two per week).

(2.2.18) KcCPC challenge the veracity of SZC Co.’s intent when “...*the coast path could be kept open during the construction and operation of both the permanent and temporary BLFs...*” is immediately followed by “...*as far as it is reasonable practical and safe to do so.*”. Deployment of this type of tactic during the Pre-Application Consultations fed feelings of unease, disquiet and uncertainty in local communities. To have it used now, in a consultation that SZC Co. clearly intended to propose after the DCO Application had been made, can only be seen as illustrative of the contempt that SZC Co. has for the people of East Suffolk and their representatives. 

(2.2.19) KcCPC note SZC Co. “...*is consulting on four variants to the temporary BLF design, each with different capacities and different effects, in order to seek views on which may be the most appropriate.*” KcCPC is unable to offer any informed comment as to which variant may be the most appropriate and will only support a variant(s) that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

(2.2.20) KcCPC note the assertion from SZC Co. that “*the potential changes to rail and marine capacity could substantially reduce the number of HGV movements on local roads.*” However, KcCPC regard any such unsubstantiated statement as mere conjecture, with no objective value when considering the future health of the Coastal Suffolk; coastline, ecology, economy, flora, fauna as well as residents and their health and wellbeing.

2.3 Main Development Site

b) Main Platform

(2.3.1 to 2.3.14) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] more taller crane activity in more places (2.3.7, 2.3.8)
- b] the proposed marine tunnels were in the wrong place (2.3.8)

- c] new marine tunnel location also impacts '*temporary construction area*' (2.3.8)
- d] new SSSI crossing design with more flood relief, less land take, better ecological connectivity...
- e] ... with potential for larger trees on new gradient embankments (2.3.9)
- f] Revision to let a '*temporary*' outfall pipe discharge surface water... (2.3.12)
- g] ... to the foreshore prior to the completion of the 300 metre offshore CDO
- h] change sea defence method to; cheaper, faster, simpler, less bulky sheet-pile... (2.3.13)
- i] ... increasing the height for more resilience and less reliance on secondary measures (2.13.14)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to local communities, the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

c) Sizewell B relocated facilities and National Grid Land

(2.3.15 to 2.3.19) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] we might acquire more land from Sizewell A... (2.3.17)
- b] ... but haven't got agreement yet (2.3.17)
- c] We have revised the layout or relocated facilities... (2.3.17)
- d] ... to be; cheaper, faster, simpler ... (2.3.17)
- e] Consulting on two options... both taking the same time to complete... (2.3.18)
- f] ... Option 1 if Sizewell A land becomes available, Option 2 if it doesn't
- g] Option 1 relocates SZB outage parking to the current SZB Car Park West (2.3.18)
- h] Option 2 relocates SZB outage parking to the Pillbox Field (2.3.18)
- i] No reduction in the order limits apply to these changes (2.13.19)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to local communities.

KcCPC note no reference is made to requirements for the DAC Demonstrator Project or the much publicised Hydrogen ambitions EDF have for the Sizewell site. Is this deliberate or should all agencies expect to be in receipt of yet more 'consultations' in the near future?



e) Temporary construction area

(2.3.22 to 2.3.31) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] More materials on-site in Early Years demand more stockpiling up to 15 metres high...
- b] ... will also impact main platform area (2.3.25)
- c] Storage of non-potable water revised to new location... (2.3.26)
- d] ... adjacent to attenuation pond, borrow pits and stockpiles... (2.3.26)
- e] ... releasing prior location for fluvial flood mitigation and... (2.3.26)
- f] ... the creation of additional wetlands habitat for Marsh Harrier foraging... (2.3.26)
- g] ... during construction phase... (2.3.26)
- h] Opportunity for transitioning to wet woodland identified but no commitment (2.3.27)
- i] Revisions to tree retention... never good news (2.13.28)
- j] Potential to include bridleway link within DCO rather than fund separately... (2.3.29)
- k] ... to include Lover's Lane crossing point, joining Bridleway 19 (2.3.30)
- l] Result – more Order Limit changes believed to create net increase in land take (2.3.31)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities, interest groups and the local community.

2.5 Two Village bypass

c) Proposed changes to the DCO Application

(2.5.6 to 2.5.8) Summarised, appears to say:

- 1] SZC Co. has been talking with SCC and were found wanting in 'visibility' standards (2.5.6)
- 2] ... needing an increase in the land take...
- 3] ... but then again it might not, once SZC Co. has completed more necessary speed surveys
- 4] SCC have asked that the route be formalised as a PRoW (2.5.7)
- 5] ... SZC Co. are consulting on upgrading it further to a bridleway and two routing options
- 6] SZC Co. talks of an '*opportunity to use land within the Order Limits to provide additional...*
- 7] ... *habitat for the loss of floodplain grazing marsh habitat.*' But not consulted on at (2.5.8)

2.6 Sizewell link road

c) Proposed changes to the DCO Application

(2.5.6 to 2.5.8) Summarised, appears to say:

- A] SZC Co. have been talking with SCC and were found wanting in 'visibility' standards (2.6.6)
- B] ... needing an increase in land take and vegetation losses...
- C] ...but then again it might not, once SZC Co. has completed more necessary speed surveys
- D] Similarly SZC Co. were found wanting in their approach to drainage (2.6.7)
- E] ... new proposals using attenuation basins and discharge to local water courses result in...
- F] ...substantial increases in land take
- G] ...but then again it might not, once SZC Co. has done the required hydraulic modelling
- H] Elsewhere on the SLR, SZC Co. have completed topographical work (2.6.8)
- I] ...incomplete during the consultation phase and also prior to the DCO Application
- J] ...leading to changes in; design, land take and the length of time land is required
- K] ...so absolute clarity on that too!


CHAPTER 3. FREIGHT MANAGEMENT STRATEGY

3.1 Introduction

(3.1.2) Alas, were the issues not so serious the loose translation of SZC Co.'s *"Potential changes to rail movements from those assumed in the Application"* to a dictionary derived: 'Potential changes to rail movements from those **taken as being true for the purpose of argument or action...**' might strike an altogether more prophetic chord with many Coastal Suffolk Parish Councils.

As has been the case throughout Pre-Application consultation, Parish Councils are once again confronted with an overabundance of *"potential"* with very little being concrete (sic). Indeed, previously unthinkable options are now being promulgated by SZC Co. as providing potential routes to *"increase train capacity"* and *"simultaneously reduce Heavy Goods Vehicle movements"*.

Like others, KcCPC have consistently asked SZC Co. to substantiate claims made throughout Pre-Application Consultation phases in the face of; little tangible evidence, sparse/incomplete data and little demonstrable 'joined up thinking'.


So, whilst SZC Co. continue to mount an increasing; political, media and PR blitz, many coastal Suffolk communities face another round of transitory hyperbole, accompanied of course by the now mandatory caveats and qualifications. The question that remains unanswered is why SZC Co. have taken nearly a decade in the planning to realise that coastal Suffolk (and much of the rest of Suffolk) does not have the infrastructure or resilience within its road network to support civil engineering projects of this scale. 

(3.1.3) It seems absurd that SZC Co. are only now unequivocal in stating it *"... has been conscious of the need to ensure that its freight management strategy optimised the sustainable transport of material by rail or sea, whilst limiting and mitigating the impacts of necessary road transport."*

Since any sort of 'can do' approach was dispensed with much early on in Pre-Application Consultation rounds, SZC Co. have been little more than dismissive of marine options *'due to environmental impacts'* and very disparaging about rail options laying blame; squarely at the door of the track owner/operator, the time to get effective engagement and their inability to get timely infrastructural remedies developed and agreed.

(3.1.4) Dubbing a basket of un-associated components as *'integrated'* is nothing more than a sloppy piece of PR spin and is tantamount to sailing oil tankers under flags of convenience. There is little to define any of the SZC Co. proposals as integrated, although collectively they may deliver what SZC Co. has set out to achieve... for their own ends.

Integration is a far more refined concept than that portrayed by SZC Co. during the last few years. For example, reflect on the intricacy of an 'integrated circuit' or the sophisticated systems required to build integrated mass transit networks.

It is a misnomer for SZC Co. to think that they have achieved any form of integration in respect to their freight management strategy. Moreover, it is wilfully misleading to continue to portray it as such to the public. 

(3.1.5) KcCPC once again draw SZC Co.'s attention to one of many inconsistencies identified in both Pre-Application and Post Application Consultation documents. Specifically, in this case KcCPC is concerned at the use (or abuse through interchangeability) of both *"weight"* and *"volume"* with regard to freight percentages, construction materials, etc.

As an engineering company SZC Co. are no doubt aware of the difference between the two terms, leading the Council to conclude that they are either deliberately using both (simultaneously within the same document) to confuse the

unaware reader or alternatively, to enable a more favourable portrayal of their proposals in sensitive areas of public concern (i.e. traffic movements). Q

(3.1.6) KcCPC have identified that SZC Co.'s liberal use of the term "*sustainable*" in both the Pre-Application and Post Application Consultation documents maybe context sensitive and thereby open to interpretation.

Given the critical nature of the impacts SZC Co. are proposing to inflict on coastal Suffolk's; economy, residents, businesses, visitors, ecosystems, flora, fauna and environment it is of continuing concern that no agreed definition(s) appear. If this is an oversight, it should be rectified. If it is deliberate, SZC Co. should provide one definition or more, if context applicable variants exist, prior to progressing with the Application through the Planning Inspectorate? Q

(3.1.7) KcCPC is concerned that whilst "*...detailed site investigation work has continued to finalise materials volumes...*" has continued beyond submission of the Application, SZC Co. do not intend to make the results available and confirmed until "*any DCO changes arising from this consultation are formally requested.*"

This approach is symptomatic of the lack of respect SZC Co. appear to have for consultees, particularly as this information may have a significant bearing on the anticipated; traffic, rail and/or sea movements. Is the reality that SZC Co. already understands the likely outcome and is reluctant to make public the degree of movements that will be necessary to "*export*" excavated materials from the site? Q

(3.1.8) So, it seems if you engage experts to look at logistics and materials handling and procurement, they very rapidly come to the conclusion that "*aggregates and other materials from sources which are rail connected or... potentially allow shipment by sea.*" are not only potentially viable but may also be preferable to road haulage!

This revelation begs the question, why weren't these fundamental issues dealt with at the outset? Q

(3.1.9) Consequently, it seems that SZC Co., enjoying a timeline largely of their design can still only muster;

*"This work has resulted in two **potential changes**..."*

*"**potential** to run 4 or possibly even 5 trains per day for a short period, 5 or 6 days a week;..."*

*"**potential options** for a new temporary BLF to increase the capacity..."*

The reality is SZC Co. have kept coastal Suffolk dangling on a chain with a stream of inconsistent thinking, essentially playing a game with people's lives and emotions to the detriment of the health and wellbeing of local communities. All of this before the Planning Inspectorate has barely been able to review the original Application. Furthermore, this is a company claiming to be working to minimise impacts on local communities... Q

(3.1.11) KcCPC note that "*SZC Co. shares the objectives of stakeholders and the local community that goods should be moved sustainably wherever possible and that HGV numbers should be limited...*" and the assertion that their contractors "*also strongly favour the use of rail and sea...because it can be highly efficient, reliable and cost effective.*"

Despite this, KcCPC again wish to make the point that SZC Co.'s actions do little to demonstrate that this is their foremost in their considerations, particularly when considered in combination with seemingly indifferent attitudes on the volume and management of LGV movements and the additional 10,000 forecast daily car movements in, out and around the coastal Suffolk area.

(3.1.12) KcCPC note Table 3.1 and the paucity of qualitative or quantitative information that it gives the reader.

Once again SZC Co. has provided an illustration of their continuing unwillingness to adequately **evidence** assertions made in their Consultation documents.

Consequently, KcCPC are again forced to express their gravest concern at SZC Co.'s refusal to provide consultees and impacted communities with satisfactory levels of clarity and underpinning data. Q

KcCPC also note (reinforcing a previous question) that neither volume nor weight is designated as the unit of measurement in this table. So, is this volume or weight...or perhaps it is a percentage of something completely different? Please provide clarity as to what is being portrayed. Q

(3.1.13) KcCPC note "...there is a significant **volume** of material which will require transport by HGV." and "...HGV is defined in the Application as any goods vehicle over 3.5 tonnes". The Council also note HGV is omitted from Defined Terms on (Pages 172 -4).

On the basis that HGV vehicles are as categorised above, the Council seek confirmation that all HGV's will be subject to active routing management by SZC Co. into and away from the construction area. Q

(3.1.14) Due to the lack of purposeful data being provided in Table 3.1 (see question above), KcCPC are unable to fully understand why the upper range (percent) for Rail and Sea cannot be achieved both individually and collectively.

The Council notes "...material moved by HGV is unlikely to be less than 40% of the total as this proportion of materials is best suited to road transportation." but once again is unable to fully understand why, largely because of the scarcity of relevant information.

In that context, KcCPC regret that the **unstated option of 80% being achievable by Rail and Sea**, whilst it may exist appears to have been precipitously dismissed by SZC Co. without adequate explanation.

Can SZC Co. explain why the dismissal of an option to potentially leave just a residual 20% dependent on road transport has not been more fully explained, along with any underpinning data? Q

KcCPC note that Table 3.1 and Para 3.1.14 deal with the "**volume**" of materials, whilst Paras 3.2.4 & 3.2.5 exclusively use **weight** (specifically tonnes). Why is this inconsistency introduced and how does it provide the consultee with clarity when reading SZC Co.'s Consultation documentation. Q

KcCPC presume SZC Co. is aware these terms are incompatible and not interchangeable? Q

(3.1.15) KcCPC note SZC Co.'s assertion that "*A balance also needs to be struck between the benefits and the environmental effects of the different transport options in order to arrive at the optimum freight management final strategy.*"

In the absence of this being developed further in this document now or previously, the Council asks for SZC Co. to provide full disclosure of the tools and data being used to assess the "...the benefits and the environmental effects..." alongside the decision support matrix and methodology from which the derived best case "*balance*" has been obtained. Q

(3.1.17) KcCPC note SZC Co.'s assertion that "*The outcome from this consultation will assist SZC Co. to find the optimum strategy...*"

In the absence of this being developed, the Council asks for SZC Co. to provide full disclosure of the tools and data being used to assess the "...the optimum strategy..." alongside the decision support matrix and methodology from which the derived best case "*optimum strategy*" will be obtained. Q

3.2 Increase in the frequency of freight train movements to facilitate bulk materials imports by rail

a) Potential changes to rail movements assumed in the DCO Application

(3.2.1) For the avoidance of doubt, *“In the early years, rail operations would...”* is understood to mean Years 1 & 2 of the Project. SZC Co. is asked to confirm this. Q

Assuming this is confirmed it is unclear when the upgrade to *“the Saxmundham to Leiston branch line”* and construction of the *“newly constructed sidings in the LEEIE”* would occur. When is this specifically and how will inbound materials and outbound waste for this construction be transported? Q

KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“...No trains would travel through Leiston at night.”* inferring that trains will travel past other communities in similarly close proximity to the track at night. What rationale do SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

The Council also note *“... the trains would leave LEEIE in the evening, be held again on the branch line and then return to the main East Suffolk Line at night.”* inferring that trains will travel past other communities in similarly close proximity to the track at night. Again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality?

(3.2.2) It is noted that *“The green rail route is expected to be constructed and operational within the first two years of the Sizewell C Project...”* and the Council would like to receive confirmation that the works described in Para 3.2.1 are capable of being completed in parallel with construction of the Green Rail Route without placing an inordinate HGV load on the A12/B1122 (or any other route). Q

KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“The Application anticipates that these train movements would predominantly happen at night.”* inferring that trains will continue to travel past communities (other than Leiston) in similarly close proximity to the track at night. What rationale does SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

(3.2.4) KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“three trains would be likely to arrive in the early morning (before 07:00)”* inferring that trains will continue to travel past communities (other than Leiston) in similarly close proximity to the track at night. What rationale does SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

The Council note *“...it was assumed that five of these rail movements (three inbound and two outbound) would happen at night (defined as between 23:00 and 07:00) and one would happen during the day (i.e. after 07:00).”* inferring that trains will travel past other communities (other than Leiston) in similarly close proximity to the track, at night. Again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

(3.2.5) KcCPC note that SZC Co. is still unable to give certainty in respect to the constitution of the proposed freight trains, caveating their latest thinking with *“... capacities need to be confirmed through continuing engagement with Network Rail”*.


SZC Co. then continues *“... each train is equivalent to that of 67.5 HGVs (135 two-way HGV movements)”*

KcCPC believe this para is misleading and with regard to previous SZC Co. briefing, should instead read *“... each train is equivalent to that of 67.5 HGVs (135 HGV movements)”*, **not** so-called *“two-way movements”*. Q


b) The potential to increase rail capacity

(3.2.6) KcCPC notes SZC Co.'s continuing "...detailed discussions with Network Rail and with freight operating companies" and their assertion that there is identified potential to increase both overnight and six day week (Monday to Saturday) train movements.


Once again, KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, with growing disquiet the Council note the potential for SZC Co. to bring forward proposals to run more trains day and night, six days a week, requiring that trains must travel past communities (other than Leiston) but in similarly close proximity to the track.

Once again the Council must insist that SZC Co. is compelled to publicly disclose how treating similar proximity trackside communities with such blatant inequality can be justified? 

(3.2.7) KcCPC is concerned that SZC Co. continue to bring forward for consultation an ever increasing number of variants to their proposals with negligible evidence they are achievable, little or no base data, scant information as to how they might be achieved, at what cost to the environment, locality, etc. and with what impact.


In this respect and despite the last sentence of Para 3.2.7, the Council is concerned that this eleventh hour consultation is little more than a thinly disguised vehicle to enable SZC Co.'s embryonic thinking to pass the "...we have consulted hurdle..." and mollify stakeholders. 

(3.2.8) Once again, KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, with increasing angst the Council note the potential for SZC Co. to bring forward proposals to run even more trains day and night requiring that trains must travel through communities (other than Leiston which seems to have special protection) in similarly close proximity to the track.

Once again the Council must insist SZC Co. publicly disclose how treating similar proximity trackside communities with such blatant inequality can ever be justified? 

(3.2.9) This paragraph is akin to a catch-all, with so much uncertainty, diverse elements and caveats, as to make it virtually incomprehensible. KcCPC do not believe it provides a sound basis on which the Council would wish to provide any feedback other than outright opposition to; ongoing, incomplete, unclear, heavily nuanced outlines that seemingly have little or no structured analysis and don't appear to have the unequivocal support of the necessary parties to enable effective and timely delivery.

(3.2.11) KcCPC note table 3.2, not for the depth of information that it contains, but for confirmation that SZC Co. are indeed anticipating a construction period over (the widely predicted) 12 years i.e. 2022 through to 2034.

The Council ask SZC Co. to drop the pretence that construction will be between 9-12 years and publicly acknowledge that coastal Suffolk will be a building site for at least 12 years? 

(3.2.12) KcCPC is confounded by another pair of vacuous statements from SZC Co. specifically; "...it is assumed that the loading capacity of trains cannot be improved..." and "it would not be appropriate at this stage, however, to assume that each train could increase its payload." and then concluding the paragraph with "Any increase in payload, of course, would generate further direct savings of HGV movements."

Can SZC Co. explain why a paragraph of this consultation is wasted with what can only be described as speculation? Is this the level of regard SZC Co. have for Local Authority staff and residents time under Tier 2 lockdown, in the run up to the much anticipated festive season?

Alternatively is it included to enable SZC Co. to increase train payloads over the duration of the proposed project without having to seek a variation to the DCO? **Q**

c) Potential for HGV reductions

i. Potential for HGV reductions from additional rail movements

(3.2.13) KcCPC note the 18.5 tonne payload anticipated by SZC Co. for the HGV fleet and the inference that this is unlikely to be the average payload as they anticipate “...that the HGV fleet could include a proportion of larger vehicles.”

Why have SZC Co. not provided a quantification of the estimated; volume, density and weight “of larger vehicles” and their likely distribution through the construction period? **Q**

(3.2.14) KcCPC note the SZC assertion that “...each train movement (with its assumed pay load of 1,250 tonnes) would result in a reduction of 67.5 HGV deliveries...”

SZC Co. then continue “or 135 two-way HGV movements.”

KcCPC believe this para is misleading and with regard to previous SZC Co. briefing, should read “...each train is equivalent to that of 67.5 HGV deliveries, or 135 HGV movements”, not the so-called “two-way HGV movements”. **Q**

(3.2.15) KcCPC note that as in previous consultation, SZC Co. have again failed to declare the total anticipated HGV movements for completion of the proposed Sizewell C power station. Instead they hypothesise (from an undeclared base) on the potential reduction in HGV movements on the A12 likely to occur as a result of (as yet unconfirmed) rail and sea delivery proposals.

Consequently it seems all stakeholders will remain in the dark in respect to fundamental issues that will impact coastal Suffolk for 12 years or more.

KcCPC do also have concerns about the figures quoted in Para 3.2.15, specifically:

203 HGV deliveries per day x 5 days = 1,015 per week

52 weeks per year (maximum achievable) x 1,015 deliveries per week = **52,780** not SZC Co.’s claimed 57,980

SZC Co. advantageous variance = 57,980 – 52,780 = **5,200 HGV deliveries**

How do SZC Co. account for an advantageous variance in excess of 5 days, not directly divisible by 1,015? **Q**

(3.2.16) KcCPC oppose proposals that see East Suffolk’s trackside communities exposed to the undue disturbance created by night train movements (as discussed in this response earlier) and that SZC Co. have deliberately avoided inflicting on the community of Sizewell.

Once again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality? **Q**

For the avoidance of doubt, noting the SZC Co. attestation that “It is possible that train services could run six days a week (Monday to Saturday), although seven days a week is not proposed.” KcCPC make it clear it would also oppose any attempt by SZC Co. to run freight on Sundays and is deeply concerned at the potential disruption to people’s lives, especially at night and through the weekend. **Q**

(3.2.17) KcCPC notes Table 3.3 but find it less than informative

(3.2.18) Reference is made to *“To assist with this, the potential environmental effects of the increased train activity are summarised further, alongside a description of the environmental benefits of reduced HGV movements (see section 3.4 of this chapter).”*

There appears to be no section 3.4, should the reference be to Table 3.5?

Q

ii. Potential for HGV reductions from an increase in the transport of materials by sea

(3.2.19) The Council acknowledge SZC Co.’s stated desire to achieve a balance between rail, sea and road and are interested to understand what methodology and key drivers are currently being used by the applicant to determine the “... the optimum balance... ”?

Q

Should SZC receive approval, KcCPC regard the optimum balance to be that which (not exclusively);

- 1] safeguards all of the onshore and offshore ecological, heritage and environmental assets of coastal Suffolk
- 2] respects and recognises the importance of the physical and mental health and wellbeing of residents, visitors and holidaymakers
- 3] understands the needs of local businesses (i.e. within 20 miles of Sizewell) and works hard to ensure their stability, viability and continuity of their skilled staff, without unnecessarily depleting their labour pool
- 4] ensures Suffolk residents and businesses feel assured that the SZC Project respects and values their views
- 5] takes all necessary steps to ensure that the very limited infrastructural assets (road, rail, communications, schools, hospitals, clinics, etc.) within coastal Suffolk are prioritised for the use of residents, local businesses, visitors and holidaymakers, thereby reducing the overall impact of the SZC Project on the daily needs of these stakeholders.

(3.2.20) Whilst KcCPC understand why SZC Co. are expressing the *“... alternative or additional potential...”* as HGV equivalents. However, the facts are that no rail or sea option appears to be more than hypothetical at this point in time and therefore of little tangible value to a substantial portion of an increasingly beleaguered coastal Suffolk population.

The stark reality is that SZC Co. have spent the past decade developing their plans based on exploiting the single infrastructural asset that costs them the least to utilise – more specifically, the already inadequate road infrastructure that can best be described as one ‘heavily clotted artery’ (the A12), that rapidly dissipates into a network of unpaved roads and lanes, often incapable of safely carrying traffic larger than a LGV.

As a consequence, the SZC Co. starting point has always been focused on HGV and other road based vehicles, rather than SZC Co. acting as a catalyst for collaborative investment in alternative infrastructure that could have formed a long lasting legacy to coastal Suffolk and increased opportunities for the development of engineering and energy synergetic centres of excellence in the surrounding region.

Had SZC Co. spent the time more constructively (sic), working with partners to eradicate the use of traditional infrastructure and bringing forward a more progressive agenda to deliver the Sizewell Project, not only could they demonstrate a ‘lighter touch’, they might also have carried more local opinion with them! The question is why SZC Co. clings on so tightly to *HGV movements* as their ‘lingua franca’ and in doing so does it advance the debate?

Q

(3.2.21) The Council suggest that *“... HGV savings they would generate, however, can fairly be averaged across the year.”* whilst arithmetically correct may not be the case in respect to the number of HGV’s necessary at any particular point

in time to meet demand for specific materials (even with onsite storage) that are undeliverable because of weather conditions at sea and the limited use of the rail network. Q

(3.2.22) As suggested at 3.2.21 above, another reason for not averaging potential HGV reductions across the year is that SZC Co. may decide that if 'sea based' deliveries generate a window of opportunity, then it may be better for them to reduce the number of trains required rather than HGV movements. Q

Should SZC Co. be granted a DCO and taking on board this type of potential situation, the Council are minded to ask the Planning Inspectorate to consider the imposition of daily maxima for movements across all freight modes (i.e. HGV, Rail and Sea movements) throughout the entire construction phase of the project.

In doing so, the intention of the Council is to;

- a) mitigate the risk observed at Hinkley Point C where almost immediately after being granted a DCO an increase in the utilisation of HGV movements was sought
- b) make certain that SZC Co. undertake adequate detailed pre-initiation planning to fully safeguard coastal Suffolk against any impacts of inadequate planning or unforeseen consequences arising in a project of this magnitude.
- c) ensure that 'inflight' project decision making is undertaken in the round, considering not just the impact on the construction timetable, but also the impacts on the locality and its residents (i.e. from entry onto the A12 through to the construction site(s)).

The Council believe this will not be disadvantageous to SZC Co. (if their application is granted) as within the paragraph they themselves emphasise *"The balance to be struck between rail, sea and road capacity will require careful planning ... and the profile of demand for construction materials over the construction period."* Q

KcCPC note at bullet point three, SZC Co. identify *"...there is potential to import infill material from marine sources."* and are concerned that this may be a prelude to marine dredging off the Suffolk coast, as has occurred in the West Country during the construction of Hinkley Point C.

Therefore, the Council seek a categorical guarantee from SZC Co. that there will be no marine dredging initiated by them (or their suppliers/contractors) for the purpose of obtaining construction material, within a 50 mile radius of the proposed Sizewell C development.

(3.2.23) As discussed in the previous paragraphs, whilst the Council understand that SZC Co. may need to exercise some flexibility in their materials handling strategy, the environment, residents and businesses must be safeguarded from the worst excesses of expediency.

In order to mitigate these risks the Council will again seek the imposition of daily modal maxima for the duration of the construction phase. To reinforce careful planning and the exercising of sound management controls the Council will further suggest that the Planning Inspectorate consider setting the maxima at a threshold below the "Typical and Busiest Day" figures used by SZC Co. in the DCO Application. Initially this might reasonably be set at -15%, subject to six monthly review by the Planning Authority. Q

(3.2.24) As the variables involved in calculating the impacts on each modal option are numerous and SZC Co. are unable to commit to anything with a degree of certainty, KcCPC can only note the various hypotheses. To do more on the basis of the information provided would only be speculation and not form a solid foundation on which to express a preference. Q

(3.2.25) KcCPC note SZC Co. are still working through “...all these matters...” and are only able to provide an “... estimation of how these options might affect overall HGV numbers during the peak period... whilst “...rail and sea infrastructure would not be in place early enough to affect the early years HGV numbers...”.

The Council regard this as a deplorable situation created solely by SZC Co. after; concluding their Pre-Application Consultations, making their DCO Application and their insistence that a further consultation be undertaken after Relevant Representations were published. Q

(3.2.27) KcCPC note SZC Co. is adamant “... there will always be a core of material that needs to be moved by HGV” but aside from the scant summary in Table 3.1 they have never quantified what this minimum case might be. Q

The Council regard Table 3.1 as potentially demonstrating the minimum materials deliveries that can only be fulfilled by HGV (i.e. “concrete powders”).

Irrespective of whether this view reflects the reality and complexities, the table still doesn’t quantify the estimated total concrete powders involved (by volume or weight) for completion of all the construction works. Consequently, it too provides an unsound basis on which the Council could form an opinion. Q

(3.2.28) KcCPC regard SZC Co.’s assertion that “... we set out a potential rail-led option which was widely supported by consultees but which has proven not to be deliverable...” as tantamount to claim it is humane to offer the condemned man a choice between being hung or shot! Q

What is more pertinent is that the proffered potential rail-led option “...showed the lowest HGV generation...”, something SZC Co. should have been more mindful of during their rushed development of the Stage 4 Pre-Application Consultation.

Table 3.4 alludes to outcomes that “...could produce a similarly reduced level of HGV movements...”. That too is not entirely true insofar as; the ‘Typical Day best’ is still 10% higher, with the ‘Busiest Day best’ seemingly just achieving parity.

(3.2.29) KcCPC have no expertise or source of reliable knowledge in respect to the issues arising from SZC Co.’s “... marine options and their potential effects...”. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies and other expert witnesses who may respond to this consultation.

However, the Council is concerned that previously SZC Co. has expressed the view that marine fulfilment would necessitate unacceptable levels of damage to the marine environment. In this context they are concerned that SZC Co. does not appear to have explicitly explained how this damage has been avoided? Q

(3.2.30) See comments at 3.2.22 and 3.2.29 above

(3.2.31) See comments at 3.2.22 and 3.2.29 above

d) Environmental impact of the additional rail movements and reduced HGVs

i. Preliminary environmental information (PEI)

(3.2.32) KcCPC note that “Table 3.5 ... provides a summary of the preliminary environmental assessments by reference to the Application It also sets out further work to be undertaken to confirm the environmental impact of the potential changes, if changes are confirmed to be taken forward.”, implying minimal work has been undertaken prior to making the request for an additional consultation.


The Council regards this as further evidence of SZC Co. taking unnecessary shortcuts to expedite the progress of their Application for a DCO. This is particularly concerning as parts of the original impact assessment were outstanding at the point the DCO Application was made, as well as when this additional consultation was requested. 

Table 3.5 KcCPC note the following with grave concern;

Rail Passengers – the disruption/loss of passenger services on the East Suffolk line to accommodate a fifth train

Early Years – *“potential enhancements in rail and marine would not be in place... during the early years.”*

Traffic – *“The potential HGV reduction at peak construction as a result of the additional trains is unlikely to materially...*

- *change the effect on severance and pedestrian delay*
- *the effect on driver delay*

However SZC Co. think it is likely to reduce the previously identified effect on amenity, fear and intimidation by reducing the proportion of HGV traffic. They also claim it would also enhance road safety.

The Council is also astonished to learn SZC Co. have concluded that *“...fewer HGVs on the road network as a result of the additional trains is expected to lead to a reduction in road traffic along the proposed HGV routes”*

CHAPTER 4. MAIN DEVELOPMENT SITE

4.1 Introduction

(4.2.3) KcCPC are gratified to see that ideas promoted by the Council in earlier consultations have, although late in the day, led SZC Co. to examine re-use of available land, both within their own estate and also in the neighbouring Sizewell A estate.

However, KcCPC are very concerned that announcements vis potentially more varied activities being sited at Sizewell that have no prominence in this latest consultation, specifically;

A] A 'Direct Air Capture' Project Demonstrator (DAC)

B] A 'Green Hydrogen' Project

As a result the Council are concerned that land potentially made available above may get consumed by activities other than those being proposed in the DCO. Q

4.4 Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk

(4.4.6) KcCPC are concerned that although SZC Co. say *"The flood mitigation area and wetland habitats would be constructed very early in the construction phase"* there is no clarity as to; what 'very early' means, any relevant dependencies, any interdependencies, etc.

Consequently, the Council questions what value they should place on such an imprecise undertaking, if any? Q

Figures 4.9 & 4.10 KcCPC note the use of an LGV in the illustrations, presumably to put context into the scale of the SSSI crossing proposal. The Council believes this is to be a vain attempt to distort people's perception of what is fundamentally a disproportionately large 'man made intervention' in a precious and treasured environment.

Like many tables, maps and figures used by SZC Co. during Pre-Application this is another unnecessary and unworthy tactic aimed at portraying SZC Co.'s proposal in the least damaging or most favourable light, dependent on your viewpoint! Q

4.6 Revisions to tree retention on the main development site

(4.6.1) Whilst candour is an admirable characteristic much of the time, sometimes it is misjudged specifically; *"whilst efforts have been made to retain existing vegetation where practicable, development proposals of this magnitude would inevitably result in wholesale changes to the existing landscape fabric with large-scale effects during the construction period."*

Is it unreasonable to expect SZC Co. to respect impacted parties and their love for the landscapes in and around an AONB?

4.8 Change to the sea defence to make the scheme more efficient and resilient to climate change

a) The proposed development in the Application

(4.6.1) KcCPC have no expertise or source of reliable knowledge in respect to the issues arising from SZC Co.'s proposed changes to the sea defences. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies and other expert witnesses who may respond to this consultation.

However, the Council is concerned that previously SZC Co. has expressed the view that having taken expert advice, their previous sea defence proposals were more than adequate to deal with the worst excesses of climate change and the consequent rises in sea levels in and around the coastal Suffolk area.

In this context KcCPC is concerned that SZC Co. does not appear to have explicitly explained why the proposed changes have become so pressing and presumably a major motivation for seeking another consultation prior to examination by the Planning Inspectorate?



CHAPTER 5. ASSOCIATED DEVELOPMENT

5.2 Southern park and ride at Wickham Market - Extension of landscaped bund and other minor changes

i) Extension to north-west landscape bund

(5.2.7) KcCPC note the extension to the bund adjacent to the north-west boundary and notification that the *“proposed change would ensure that the bund runs alongside the access to and from the TIMA.”*

In noting this change the Council seek clarification on issues regarding the TIMA and its operation, not previously adequately addressed by SZC Co., specifically:

- i] the planned capacity of the TIMA in respect to, HGV, LGV and presumably any AIL impacted by an incident? Q
- ii] whether HGV, LGV and AIL's approaching the main site from the north of Yoxford would be diverted south on the A12 to the Southern Park & Ride's TIMA in the event of an incident and if so, what those incidents might include? Q
- iii] if there are no circumstances in which the measures described in ii (above) would be invoked, where do SZC Co. plan to lay-up HGV, LGV and AIL's approaching the site from the north of Yoxford? Q
- iv] in the event of an incident on the A12 above the Southern Park & Ride's TIMA (but prior to the SLR), where do SZC Co. plan to facilitate 'turn back manoeuvring' of HGV, LGV and AIL's movements? Q
- v] in the event of an incident at any point on the SLR what plans do SZC Co. have planned to facilitate either;
 - a) 'turn back manoeuvring' of HGV, LGV and AIL's movements Q
 - b) 'lay-up' of HGV, LGV and AIL's movements? Q
 - c] diversion off the SLR and onto the B1122 through Middleton & Theberton Q

In the event of SZC bound LGVs HGVs or an AIL (or AILs) fouling any part of the A12, SLR or any other public highway in coastal Suffolk, will SZC Co. have any proactive response to aid the emergency services? Q

What are the key decision making criteria for invoking any of these potential remedies (and others if they exist) and what protocols will be observed? Q

How will SZC Co. distinguish SZC construction traffic from 'public' vehicles and what protocols will be observed to ensure that the public are not unintentionally or unnecessarily part of a HGV, LGV and AIL's lay-up? Q

5.3 Sizewell link road - Extension to and reduction of the Order Limits

a) Introduction

(5.3.1) KcCPC are disappointed that despite a fairly bullish portrayal of the potential for reducing HGV movements through new rail and sea initiatives, SZC Co. appear to have overlooked the potential impact these reductions might have on the efficacy and economic cost of the proposed SLR.

The Council have reflected on;

- A] the opaque information provided by SZC Co. in respect to their criteria and processes for finding the proposed route as the most suitable Q
- B] the less than transparent ‘peer review’ undertaken to seek confirmation of their choice Q
- C] the marked lack of enthusiasm shown by SZC Co. to collaborate in bringing an enduring and more effective solution to fruition that would enhance the lives of coastal Suffolk residents, businesses, visitors and holidaymakers Q

It is a continuing concern of the Council that the proposed SLR potentially brings an enormous volume of construction traffic unnecessarily so far north on the A12 prior to routing it onto a uniquely ‘Sizewell centric’ link road coined by some communities as “a road to nowhere”. Q

In essence this proposal struggles to make environmental sense with a huge increase in HGV miles being incurred by having to go north to the KcCPC border with Yoxford, prior to turning east across some of the best farming land in the area, rich with habitats conducive to a wide range of flora and fauna as demonstrated by nearby roadside nature reserves and natural ponds brimming with scarce and threatened species. Q

Consequently, KcCPC will be asking the Planning Inspectorate to:

- a) examine the methods by which SZC Co. derived the proposed route as the most suitable
- b) examine the underpinning criteria and data used in reaching the final decision
- c) examine the ‘peer review’ for its efficacy
- d) examine the impact of the proposed/potential reductions in HGV movements on the ‘justifications’ pertaining to the proposed SLR route

(5.3.9) KcCPC are concerned that in seeking to make changes to *“to provide increased visibility at junctions proposed along the Sizewell link road for highway safety in accordance with the design speed of 60mph.”* there are unforeseen consequences that will have a significant detrimental impact on road safety, a nature reserve, two roadside nature reserves, important verge and hedgerow habitats, agricultural traffic, non-designated heritage assets, Kelsale Village Conservation Area, public amenity space enjoyed through a network of unpaved single track lanes hosting walkers, joggers, horse riders, etc. Q


These have previously been advised to SZC Co. through the consultation process. Nevertheless, at best they remain unaddressed, at worst they are further exacerbated by the most recent proposed changes. Q

Consequently, the Council will be asking the Planning Inspectorate to examine in depth the impact the proposals for Fordley Road access from the SLR will have on a large network of single track unpaved lanes and the adjacent residents and businesses. Q

(5.3.10) KcCPC are concerned at the increasing amount of quality farming land that is being sought by SZC Co. to make good insufficient drainage arrangements that were previously inadequately investigated prior to both the selection of this route as the best option and subsequently the submission of the DCO Application.

The Council’s prior comments on the suitability of the proposed route for the SLR in 5.3.1 (above) are equally applicable to issues arising from the inadequate research undertaken by SZC Co. and KcCPC will be asking the Planning Inspectorate to investigate this and other facets where deficiencies are evident, during the their examination.

(Figures 5.4 thro’ 5.9) The Council are concerned at the ratio of Order Limit Extension as opposed to Order Limit Reductions in respect of SZC Co.’s new proposals for the SLR.

This imbalance is clear when considering the figures provided by SZC Co. (5.4 to 5.9 inclusive) and raises a question about exactly how much additional land is being taken for what purpose and is it absolutely necessary? 

Kelsale-cum-Carlton Parish Council's review of SZC Co.'s 30 day Public Consultation (18th November to 18th December 2020) ends.

WESTLETON PARISH COUNCIL

Westleton is a village roughly 7 miles by road north of Sizewell. It is a small village surrounded by Areas of Natural Beauty (AONB), the Minsmere RSPB reserve and the Dunwich Heath. The B1125 runs north/south through the village connecting the B1122 in the South at Middleton and the A12 at Blythburgh in the north.

The new proposals made by EDF do not change the WPC's view expressed in our September PINs submission - WPC continues to strongly oppose the construction of a new nuclear power station at Sizewell because:

- the proposed changes to reduce HGV transport will have no impact on the most immediate concern to the residents of Westleton which is that the construction will be the cause of a significant increase in traffic on the B1125 through the village; as HGV traffic is not anticipated through the village, the projected volume of traffic (up to 45% increase) through the village will still occur
- the construction of Sizewell C will be the cause of significant environmental damage to an Area of Natural Beauty on a beautiful and changing coastline and consequently will significantly reduce the appeal of the area to tourists and so damage one of the largest providers of employment and business of the area; at the same time, the influx of thousands of workers will place undue pressures on local services, housing and quality of living for residents.

Specifically:

- Road transport: even with the suggested reductions in HGV traffic, the traffic volumes will remain very high on the region's roads and so the congestion, pollution and road safety concerns remain. WPC reiterates that if the project goes ahead, the 2-village bypass, the proposed link road and associated transport infrastructure must be completed and ready for use at the start of the construction of the power station.
- Rail transport: the proposals will result in increased night-time rail transport which will further impact upon residents of the towns along the route. EDF has recognised as much saying that the rail transport will present 'a major adverse effect' both in terms of noise and potentially damaging vibration for residents along the rail line.
- Sea transport: the proposals will require significantly more infrastructure on the vulnerable and changing coastline which will increase the possibility of detrimental effects on the eco-structure of the whole Suffolk coastline.
- Social and economic impacts: the proposals will not change the fact that an additional 6,000 workers will be brought in from outside of the area. These workers will not only impact on the balance of the local economy as over 700 workers are likely to be displaced from existing businesses, but the influx of 3000 workers living in the accommodation campus and caravan site, alongside those renting locally, will create significant social pressures on the local area: notably pressures on policing, health services and local housing provision.

In conclusion, the proposals are a zero-sum-game: to reduce the HGV traffic, the coastline will experience even greater damage because of the measures needed to bring material in by sea, and residents along the train line will suffer more. Meanwhile, Westleton will still suffer a significant increase of traffic through the village. And finally, this new consultation further damages EDF's credibility: it is clear from the presentation of the proposals that EDF is unsure of the viability of these proposed changes, while they also beg the question as to why EDF could not have made these proposals in its PINs submission a few months ago.

Ian Haines
Clerk to Westleton Parish Council
December 2020

From [REDACTED]@eastsoffolk.gov.uk

Sent: 18/12/2020

To: sizewell@edfconsultation.info

Subject: SZC Stage 5 Consultation

As Ward members for the area affected, we wish to state our endorsement of Theberton and Eastbridge Parish Council's submission in particular but not exclusively at this Stage 5 of the consultation. The views of the Parish Council in general capture those of most of the residents and other interested parties who have made contact.

In particular their suggestion that should the area be decided to be compatible with the siting of SZC in principal, a reduction to one reactor would seemingly resolve many of the currently apparently insurmountable problems identified with the current plans including seaward coastal defence impact and design, insufficient acreage to construct two reactors on such a constrained site and considerably reduce the impact on the AONB and on residents. It would also lessen the negative effect on area wide tourism and farming, both mainstays of employment in the area.

The current aspirational aims to attempt to reduce HGV movements even at this late stage are to be applauded, however appear to lack credibility in deliverability. This is predominantly due to the unavoidable involvement and dependence on external influences for rail movements, and the weather for sea.

That all supporting infrastructure must be conditioned to be built at the start of the process including the SLR is vital. Should this application proceed without it would be extremely hard for the B1122 to carry both the volume it currently does and SZC construction traffic together with the traffic for the construction of the SLR, which itself should be a confirmed offering and not related to achieving a sea/rail reduction in HGV movements, or not. Leiston requires upfront construction in this area, without which its residents would be subject to an impossible volume of traffic.

It is noted that further information is still required at many points of the application. The area to the south of the site, extending past Slaughden towards Orford should be included in future surveys to assess the affects of this development on coastal processes. Alteration to these coastal processes could well cause damage and thus affect the viability of Aldeburgh's tourism and amenity offering, and this remains under assessed. The choice of Pakenham as the site for mitigation habitat may will bring benefit to that area, however it actively removes benefit from the area affected.

Should this application proceed, no reduction in the Tourism and Housing funds should be permitted. A property price support scheme on par with that at Hinkley Point should be introduced.

The general timing of this the most recent round of consultation has proved very challenging, following as it does on the heels of the last round and concluding immediately prior to Christmas. Another area highlighted time and time again is the one that though communities and individuals have been asked for, and given feedback many times over the 8 years of this NSIP, acknowledgement of this, or any meaningful alterations to EDF's plans are constantly omitted.

That EDF has offered engagement with the public over the last few years is recognised. It has recently however, become hard (when combined with the information sent by SPR and NGV among other parties), to distinguish between what is an update, and what is for example an offer of further engagement or important deadline. I would ask that EDF as a matter of urgency consider their recent

communications policy as this has become unclear and has caused confusion, and that consideration is given to a more professional means of highlighting important offers to engage, deadlines etc, and ensure what are purely updates perhaps have a different appearance.

Joint response from:

Cllr Jocelyn Bond and Cllr T-J Haworth-Culf

Carly Vince

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Tel 01206 835150

Co. Reg. No. 5677777

FAO Richard Bull

18th December 2020

Dear Madam,

Proposed Construction, Operation & Maintenance of a Generating Nuclear Power Station (Sizewell C) with Associated Development, Leiston, Suffolk, IP16 4UR: Application for a Development Consent Order (Reference EN010012) pursuant to Section 37 of The Planning Act 2008 – EDF Proposed Changes Consultation: Representation on behalf of The East of England Ambulance Service NHS Trust *

1. We write on behalf of **The East of England Ambulance Service NHS Trust (EEAST)** who provide accident and emergency services and non-emergency patient transport services across the East of England, including Leiston.
2. EEAST restates its **HOLDING OBJECTION** to this application for a development consent order (DCO), as the provisions set out in its earlier Section 56 representations are not sufficiently addressed in the information provided as part of the 'proposed changes consultation'.
3. With this in mind, it is considered that the significant adverse social and environmental (transport) effects the development is likely to have on EEAST's staff, fleet and estate assets remains;
 - A) Inadequately assessed in the EIA documentation;
 - B) Inadequately mitigated in the Section 106 Heads of Terms of Agreement;
4. EEAST's Section 56 representations submitted to EDF and PINS on 30th September 2020 are enclosed with this submission and provide information in relation point A) above. Point B) is expanded on below.

SZC Section 106 Agreement Update (November 2020)

5. It is noted from a review of the SZC Planning Statement Appendix 8.4J Addendum Update on Section 106 Agreement, that the following development consent obligations are envisaged to form community safety, health, monitoring (workforce & socio-economic impacts), public services and transport Heads of Terms of Agreement;

Community Safety

- ❖ Implementing measures set out in the Community Safety Management Plan;
- ❖ Establishment of a Community Safety Working Group;
- ❖ Financial contributions towards additional resourcing where necessary to address identified net additional levels of effects for Suffolk Constabulary, Suffolk Fire & Rescue & the East of England Ambulance Trust;
- ❖ Financial contributions to include funding towards site familiarisation, & ensuring an agreed level of support to the community is met;

Health

- ❖ Residual healthcare planning contribution to mitigate the effects the additional population from 'non-home' based workers & dependents on local NHS Services – for the time that public funding takes to adjust;
- ❖ Establish a Health Working Group;
- ❖ Provide an on – site 24/7 occupational health service to workers on the construction of the SZC project;

Monitoring – Workforce & Socio-economic Impacts

- ❖ Monitoring of impacts on the local community, including workforce surveys;
- ❖ Monitoring the construction workforce & worker accommodation;
- ❖ Establish sub-groups, such as the community safety & health working groups with responsibility to monitor SZC effects related to their expertise;

Public Services

- ❖ Establishing a public services contingency fund (for Suffolk CC) to mitigate any unexpected effects on statutory services, including school places & social care;

Transport

- ❖ Implementation of a Construction Worker Travel Plan, Traffic Incident Management Plan & Construction Traffic Management Plan;
- ❖ Preparation of an Operational Travel Plan;
- ❖ Establish a Transport Review Group (TRG) – meeting on a quarterly basis & reviewing the above Plans;
- ❖ Prepare a quarterly Transport Monitoring Report;

- ❖ Establish a Transport Contingency Fund for use by the TRG;
- ❖ Appoint a Transport Coordinator & a Delivery Contractor during the construction phase;
- ❖ Undertake highways condition survey of the B1122 prior to construction commencing & provide a B122 maintenance fund;
- ❖ Implement or fund B1078 transport safety measures, including at the A140/B1078 & B1078/B1079 junctions;
- ❖ Carry out a detailed abnormal load route assessment prior to construction commencing;
- ❖ Prepare a report estimating the number of abnormal load deliveries by road & submit an Abnormal Indivisible Load (AIL) route selection information to Suffolk CC & Highways England for approval, & Suffolk Constabulary for information with an estimate of AIL's requiring a police escort;
- ❖ Implement a traffic management & monitoring system prior to construction commencing – to monitor HGV routing to the main development site & submit details to Suffolk CC & Highways England for approval;

Financial Contributions & Strategic Relationship Protocols - Emergency Services

6. The Planning Statement makes reference to 'additional community safety measures' that it has assessed and engaged on with stakeholders related to the following areas;
 - ❖ Financial contributions to Emergency Services & Strategic Relationship Protocols (SRP's);
 - ❖ Relevant elements of the Public Services Resilience Fund with regard to community safety & particularly vulnerable groups.
7. The Planning Statement also advises an intention to set out the roles and responsibilities of SZC Co and each Emergency Service provider, to include details on financial remuneration for additional costs likely to be incurred by those providers as a result of the Project.
8. These are understood to be still in development which EDF envisage to be 'private agreements' between SZC Co and the emergency services, and are likely to include the following elements;

East of England Ambulance Service Trust

- ❖ Reasonable funding for anticipated additional call outs to the main development site;
- ❖ Site familiarisation, briefings/ attendance/ contribution to the Community Safety Working Group, provision of monitoring data & reviewing the Community Safety Management Plan;

Suffolk Constabulary

- ❖ Reasonable additional resourcing (staff & equipment) related to the potential uplift in local policing in;
 - Responding to incidents, investigations & wider community safety issues;
 - Command & control – responding to 999 & 101 calls, incident response, co-ordination & emergency preparedness, arrest & custody suite demand;
- ❖ Reasonable additional resourcing for roads policing, escorting AIL's road safety, traffic management & incident response;
- ❖ Site familiarisation, briefings/ attendance/ contribution to the Community Safety Working Group, provision of monitoring data & reviewing the Community Safety Management Plan;

Suffolk Fire & Rescue Service

- ❖ Awareness raising activities in the local community on fire & safety issues & home safety checks;
 - ❖ Site familiarisation, briefings/ attendance/ contribution to the Community Safety Working Group, provision of monitoring data & reviewing the Community Safety Management Plan;
 - ❖ Reasonable resources for updating or adapting procedures & methods based on construction activities;
9. In terms of the related Governance, EDF states that a Terms of Reference for the Community Safety Working Group has been drafted based on the structure set out in the Community Safety Management Plan, incorporating the following key elements;
- ❖ Membership including District/ County Councils, Emergency Services & SZC Co;
 - ❖ Cross group Sight Lines – by including the Projects Transport Coordinator, SCC Social Care & Public Health, sitting on the Transport Review & Health Groups respectively;
 - ❖ Monitoring & Reporting responsibilities linked to effectiveness of measures in CSMP & SRP's;q
 - ❖ Ability to review the SRP's over time;
10. Whilst the above Section 106 and SRP undertakings are noted and welcomed by EEAST, it is necessary for the likely impacts upon its staff, fleet and estate assets to be fully assessed in order to determine the form and level of mitigation required through the planning process and through any private agreements (SRP) as appropriate.
11. With this in mind, EEAST is currently developing an impact model to inform the approach of the development consent obligations as respects community safety, and related emergency service, health and transport considerations as summarised above.

EEAST Impact Model Considerations

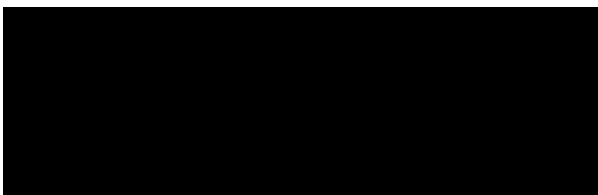
12. As set out above, and as is evident from review of the SZC Planning Statement Appendix 8.4J Addendum – Update on Section 106 Agreement, EDF’s broad recognition of the Section 56 representations submitted by EEAST in September 2020 is welcomed.
13. To provide clarity on the nature of the impacts arising from the SZC proposals, including the mitigation required by EEAST in the form of additional staff (including call handling functions/ costs), fleet and estate assets, an impact model is being prepared by EEAST with the aim of submitting it to EDF for consideration in January 2021 - informed liaison and discussions can then take place between EEAST and EDF.
14. The approach would also clarify the relevant SZC Working Groups and Panels EEAST ought to have membership on, incorporating a close working relationship with SZC’s Occupational Health Provider concerning ‘on-site’ medical health provisions and an agreed protocol for data sharing.
15. EDF funding for additional EEAST resources to attend/ manage and for administration of the SZC project, would also be required and included alongside the model.
16. The findings of the model are intended to inform the parameters for the Section 106 Heads of Terms of Agreement, including any other agreements (such as SRP’s) which may be deemed to be required, and appropriate, as respects the community safety and any other provisions affecting EEAST.
17. The model will look at both the direct (on-site) construction and operational (including the decommissioning) phase impacts, as appropriate, as well as the direct off-site construction, operational (and decommissioning) phase impacts, as appropriate, arising on EEAST.

Concluding Remarks

18. EEAST restates its **HOLDING OBJECTION** to this application for a development consent order (DCO), as the provisions set out in its earlier Section 56 representations are not sufficiently addressed in the information provided as part of the ‘proposed changes consultation’.
19. At the current time the proposals are considered to be inconsistent with a number of national policy statement, national planning policy framework and development plan document objectives, as they do not adequately avoid, reduce or compensate for all the likely community safety, including transportation, major accident and disaster effects arising, and do not therefore fully deliver sustainable development.
20. That said, EEAST has reviewed the SZC Planning Statement Appendix 8.4J Addendum – Update on Section 106 Agreement, and welcomes EDF’s broad recognition of the points raised in the Section 56 representations submitted by EEAST in September 2020. These are outlined in the mitigation led Section 106 and SRP provisions outlined above.
21. EEAST is making progress with a ‘model’ to determine the likely mitigation required to address SZC’s impacts, and intends to submit this to EDF for review and discussion in January 2021, to assist in determining (and agreeing) the increased EEAST staff, fleet and estate assets required to mitigate the scheme’s on and off site impacts arising.

22. EEAST's membership of working groups, panels and attendance/ management and administration of the SZC project, would also be considered alongside the model.
23. This is likely to require the funding, and/ or direct provision of additional EEAST staff (including call handling functions) fleet and estate assets, to be secured through Section 106 Head of Term(s) of Agreement, and through an SRP process as appropriate.
24. It would be appreciated if you could please acknowledge receipt of this submission and we look forward to liaising with you in this regard.

Yours faithfully



James Lawson
Lawson Planning Partnership Ltd

Encs