



Together Against Sizewell C

APPLICATION BY NNB GENERATION COMPANY (SZC) LIMITED
FOR A DCO GRANTING CONSENT FOR THE SIZEWELL C PROJECT

TOGETHER AGAINST SIZEWELL C (TASC) IP NO. 20026424

SUMMARY OF ORAL SUBMISSIONS & COMMENTS

RELATING TO ISH1 : Draft DCO and Deed of Obligation

1. Draft DCO

Due to lack of time and resources TASC's consideration of the draft DCO has been minimal so lack of comment should not be taken as acceptance.

2. Draft Deed of Obligation ('Deed')

- (i) TASC wish to draw PINS attention to clause 13.2 [REP2-060] which refers to SZC Co being able to claim acknowledgement for mitigation projects and authorises use of their logos, branding etc. This is replicated here:-

"13.2 The parties agree that where particular mitigation works, projects or benefits are funded from any of the Contributions secured under this Deed:

13.2.1 SZC Co shall be acknowledged as having funded such works, projects or benefits;

13.2.2 SZC Co branding and/or corporate images or logos shall be included (unless instructed to the contrary by SZC Co) in literature or publicity material relating to such works, projects or benefits;

13.2.3 signage (at the discretion of SZC Co) bearing SZC Co branding and/or corporate images or logos shall be erected or affixed to buildings and other facilities funded out of the Contributions; and

13.2.4 SZC Co shall have the right to be involved in publicity activities relating to such works, projects or benefits in consultation with the Councils."

TASC objects to this for 2 reasons:-

- A) These mitigation projects are to compensate for adverse impacts that the Applicant will be inflicting on the communities, businesses and environment of east Suffolk so it is perverse that they should be rewarded by being allowed to advertise their involvement.
- B) SZC Co will not be funding these compensatory projects. They have already stated they do not have the funds to carry out this development and are demanding the UK public fund the project through RAB or direct UK government investment. So we, the UK public, will be

funding SZC if it goes ahead. TASC remind PINS that we covered the matter of funding in our Written Rep [REP2-481j].

- (ii) TASC are concerned the Deed does not provide for the local communities being compensated for the site becoming a de facto nuclear waste storage facility , a function it will be required to perform until at least the mid/late 2100s. However, this could be for an indeterminate period, due to the current lack of a Geological Disposal Facility (with no guarantee that one will ever be available).
- (iii) During the discussions around the use of the term 'reasonable endeavours', Mr Rhodes argued for the Applicant that the ExA should leave things to them as they were the experts and had the skills which meant they should not have to refer back to the local authorities. Given the Applicant's lack of transparency throughout the pre-examination phase and the paucity of information during the examination process, TASC believe that the local communities need re-assurances that the Applicant has sufficient constraints put on them to enable effective control over their actions. There are plenty of reports from Hinkley Point C where NNB have wanted to change their plans significantly, reneging on prior arrangements. Unless there are adequate checks and balances in place, it would be expected that commercial considerations could dominate decision-making, leading to short-cuts being taken, resulting in increased adverse impacts from the development.
- (iv) During discussions, Mr Rhodes speaking for the Applicant, said that controls over parking would come into play if the Park and Rides were not available as there are 'parking limits' elsewhere. TASC wonders if he is aware of fly-parking and the related problems that were experienced at HPC.
- (v) TASC consider the thrust of the Applicant's points made during the ISH, regarding controls over their activities, was that the needs of the project override all other considerations. This attitude reinforces TASC's comments that adequate controls and constraints need to be placed on the developer to protect the local communities and the environment.
- (vi) Regarding the Landscape and Ecology Management Plan, TASC agree with the comments made by Natural England that it is disappointing that full details of the plans to restore the main development site are not available-this is an extremely important landscape having AONB status which will need robust plans, endorsed by the AONB partnership, with adequate funding, to have any chance of restoring the landscape (that has not become part of the built environment), to its former state, if at all possible.
- (vii) Based on discussions during the ISH, TASC are concerned about the excessive influence and control that the Applicant may have over the forums and review panels set up to monitor arrangements and distribute funds. There also appears to be an apparent lack of involvement of affected communities. Where appropriate, TASC would like to see, inclusion of representatives from parish/town councils, the ecological NGOs and landowners directly affected by a relevant issue.