

THEBERTON AND EASTBRIDGE PARISH COUNCIL

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Dear Sir/Madam,

Application for Call-in
East Suffolk District Council Ref DC/19/1637/FUL
Applicant: EDF Energy Nuclear Generation Limited – Mr Nick Cofield
Title: Sizewell B Relocated Facilities

Proposal: 1. In outline, comprising a Visitor Centre (maximum 2,000sq.m GEA) and a maximum of 9,500sq.m (GEA) of floorspace to provide administration, storage, welfare and canteen facilities with all matters reserved apart from access. 2. In full, for the demolition of the existing Outage Store, Laydown Area, Operations Training Centre, Technical Training Facility, Visitor Centre, and Rosery Cottage garage; removal of technical training and pool car park (63 spaces), Coronation Wood car park (21 spaces), Visitor Centre car park (16 spaces) and northern outage car park (576 spaces); meantime use of the Technical Training Centre as an interim Visitor Centre followed by its demolition; and erection of new (all floorspace in GEA) Outage Store (2,778sq.m), Laydown Area (11,990sq.m) including New Western Access Road, Yardman's Office (23sq.m), Training Centre (4,032sq.m), Rosery Cottage garage (30sq.m), Replacement Car Park (2,363sq.m) providing 112 spaces, and Outage Car Park (15,525sq.m) providing (576 spaces) including new access road (and alternative access to bridleway), footpath and amended junction at Sizewell Gap; and associated landscaping earthworks/recontouring, tree felling and boundary treatment. | Sizewell B Power Station Complex and Adjoining Land Sizewell Power Station Road Sizewell Leiston Suffolk IP16 4UR

Theberton and Eastbridge Parish Council (the PC) request that the above planning application be called-in and for it to be considered by a planning inquiry.

The proposal is made to vacate existing land in advance of the NNB Generation Company (SZC) Limited project to build a dual nuclear reactor, Sizewell C, which has only recently undergone a Stage 3 Consultation and a fourth stage of consultation is now underway for which no feedback or consideration of responses have been made public and for which no Development Consent Order (DCO) application has yet been submitted.

The PC considers that the size, scope, location, ecological damage and irreversibility of this application is such that these works should only be considered as an integral part of the DCO process and only started after any DCO application is approved by the Secretary of State.

We believe that this application does involve matters of significant national interest and policy and meets the 'Caborn principles';

- **A conflict with national policies** on important matters, in respect of policies for the protection of national (AONB and SSSI) and international (Ramsar, SPA & SAC) wildlife sites
- **The potential for significant effects beyond their immediate boundary**, in respect of the adjacent Sizewell Marsh SSSI being designated as habitat for migratory birds which will use this habitat as an essential part of the maintenance of their populations
- **The proposal contains 15,500 sq.m. office and commercial space and 30,000 sq.m. of car park and laydown area all within Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)** and Suffolk Heritage Coast, removing 100 year old Coronation Wood and adjacent to and utilising a small area of Sizewell Marsh site of special scientific interest (SSSI)

There are further reasons why the PC consider that this application should be called-in;

- Access to and from the Pillbox Field car park will cross the SSSI and split part of its eastern extent from the main body of the SSSI and much of the land and car park are in Flood Zones 1, 2 and 3a.
- It is noted when SZB received Planning approval in 2011 by the Secretary of State for the Dry Fuel Store, it was agreed that Coronation Wood should be retained as a landscape barrier. This proposal would now see that barrier destroyed and replaced with two buildings over 25metres high with significant lighting intrusion, which is totally incompatible with the AONB and SSSI designations and the effects on bats, owls and other nocturnal fauna that frequent the area. The proposed development is also incompatible with the government's 25 year Environment Plan.
- The applicant cites Department for Communities and Local Government advice to local planning authorities to consider such advanced works applications for National Strategic Infrastructure Projects (NSIP) and states that this application is consistent with that approach and points to national government urgency in requiring new nuclear generating capacity to be brought forward. However, the applicant ignores the caveat in the same advice stating *'Local authorities may decide that such consent should potentially be granted on the basis that any preliminary works carried out will be removed if the subsequent application to the IPC is turned down or if, within a specified time, no application is made.'* Should these extensive development works be permitted, including the loss of extensive mature historic woodland & SSSI land, it would be impossible to restore the proposed development area back to its original state.
- We also believe that the National Policy Statement (NPS) for new nuclear generating capacity that will be commissioned and capable of connection to the National Grid, beyond the existing 2025 cut-off date in NPS EN-6, needs to complete its final consultation stage (summer 2019) and passage through parliament (sometime in 2020) to affirm that the Sizewell site continues to be considered a suitable site that meets the latest Habitat and Sustainability criteria that will extend to the full lifetime of the site, rather than the ~10 year planning cycle in NPS EN-6

In further support of the above, in the **Natural Environment and Rural Communities Act 2006**, it is the duty of a public authority in exercising its functions to *"have regard, so far as consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."* Also, National Policy Planning Framework and Suffolk Coastal District Councils Local Plan DM27 (Suffolk Coastal District Council has now merged with Waveney District Council to form East Suffolk District Council) require new developments to seek biodiversity net gain and this proposal fails to deliver any gain and arguably decreases biodiversity in the area.

As a Parish Council we are of the opinion that should the District Council be minded-to-approve, that they would not have given proper consideration of conserving biodiversity within this nationally designated area and also of the effects on adjacent designated sites of both national and international importance and should have thus rejected the application.

Kind regards

Sharon Smith

On behalf of Theberton and Eastbridge Parish Council