

Agenda Item 4

With reference to the original DCO application, whilst we are pleased that Coastal Geomorphology, the Hard and Soft Coastal Defence and Beach Landing Facility have now been recognised as requiring separate consideration and as additions to the Principal Issues.

The Hard and Soft Coastal Defence is indeed a critical safety issue for the integrity of the site over the 140 or more years this development will be present at Sizewell. I'm sure this is an issue the Office for Nuclear Regulation are well aware of in their consideration of the site license application.

Unfortunately, none of this can be assessed as no design has been presented at any time during 4 consultations and the DCO submission.

Given the potential impact of this structure to the east Suffolk coastline and its continuing omission from any consultation or application documents, we are surprised that to date no request, has been made by the examination panel to rectify this omission as part of the acceptance of the Development Consent Order for examination, unlike for the changes proposed and to be considered in the next agenda section.

We request that the existing DCO design used for modelling impacts and the results of that modelling by the applicant be made available immediately for assessment and that the start of the six-month statutory examination period be delayed to allow Interested Party assessment.

Agenda Item 5

We agree with previous speakers on the lack of modelling evidence associated with these DCO changes.

As we stated in the previous agenda item, currently no design and specific location has been submitted for the Hard and Soft Coastal Defence that can be assessed.

We are now asked to assess whether a design change to the Hard and Soft Coastal Defence is “not in substance that which was originally applied for”.

As we have no plan from the original DCO application it is not possible to say whether this change is substantially different. However, as a design is yet to be revealed by the applicant then this item must be considered as a material change even though we are yet again lacking a design and location details for this updated structure.

Also, in the Stage 5 consultation, the applicant submitted several proposals for a temporary beach landing facility based on “self-jacking platforms”. In the DCO amendment, this item has morphed into a light jetty which is 100 metres longer than any of those options consulted upon. There is also a lack of sufficient information to accurately assess this new proposal in terms of the geomorphological impact which therefore must be considered as a material change.

It is wholly unsatisfactory for these substantial changes and additions to be left for a decision on whether and how to accept them into the examination until after the examination has started.

There is also little evidence submitted on the changes to the SSSI crossing into the site which should be provided should these changes be accepted.

There is also an indication in the changes that the north east corner of the proposed platform and defences will be moved 20 metres south to ensure that access to the defences and structures is available without access to Minsmere designated land to the north. This will undoubtedly have an impact on the overall area available for the main site platform as the increased Hard and Soft Coastal defence at this point will impact on the area available but nothing has been presented for this change. As the site platform area is already very constrained when comparing to site area advice in EN-6 and several proposals to keep cabling underground has been shelved in favour of 60 metre pylons, will this change further impact the nature and visual aspect of the site which we have heard is entirely within the Area of Outstanding Natural Beauty.

If these proposals are accepted for examination, then as both Suffolk County Council and East Suffolk Council have suggested, then the changed application is the only one which should be examined.

I agree with Councillor Fellowes as the need for a delay to allow for proper consideration to the changes along with the needed additional information currently missing from this application and the points put forward by Stop Sizewell C.

Agenda Item 6

Having listened to the various submissions from yesterday and today, it has made me reflect on the original adequacy of consultation decision for acceptance of this DCO for examination. Statutory authorities clearly felt that the applicant had met the limited defined goals, agreed with the applicant, for community consultation.

However, the last two days have shown that many of the affected local town and parish councils, organisations and individuals are not so convinced and would question whether we should be considering the original DCO application, never mind the changed one that we are now being presented with.

The Environment Agency have consistently requested that the three licenses associated with the operation of the station be submitted at least 6 months prior to DCO submission to enable their determination to be available for the examining authority during the DCO application. These were submitted concurrently with the DCO application which means their determination are likely to be beyond the examination period.

We have also heard that the ONR Site License will not be determined prior to the end of the examination. The precise nature of the Hard and Soft Coastal Defence will be central to the determination this license on site safety grounds and but the ONR are not the statutory authority for coastal issues.

The parameters that have been given so far for the Hard Coastal Defence have been questioned by Robin Sanders today and other coastal organisations and statutory consultees in prior consultations, so are considered inadequate and it must be obvious to the applicant that this will not be acceptable to the ONR determination.

As a result, the environmental and coastal geomorphology impacts of any final design will not have been assessed within the DCO examination and how that can be managed within a draft Development Consent Order whilst giving an appropriate

opportunity for those organisations and interested parties to be able to examine and have input into the design and environmental impact is not clear.

For this examination to take place without any hope for these four determinations being available to the examination and for Interested Parties to be able to assess and Coastal Defence plans is unacceptable.

It would be preferable that the examination start would be set so as all the EA and ONR determinations were available and give time for Interested Parties to examine and assess the final design of the Hard and Soft Coastal Defence. The contention that the Coastal Monitoring and Mitigation Plan can be agreed without access to a final design and location for these structures is fanciful.

We therefore request that the examining authority determine the start and timetable for the examination to ensure that all these relevant determinations and assessments are able to be made.