

THEBERTON AND EASTBRIDGE PARISH COUNCIL

Mrs Sharon Smith
Parish Clerk
Arbour House
Rectory Road
Middleton
IP17 3NP

01728 648576
parishclerkthebertoneastbridge@gmail.com

Astrid Chaplin
Planning Casework Officer
Planning Casework Unit
2 Rivergate
Temple Quay
Bristol
BS1 6EH

24 September 2019

Dear Ms Chaplin,

Re: 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

Following discussion with Councillor Graham Bickers regarding supporting material to our Call-in of DC/19/1637/FUL, we would like the following to be taken into account in your consideration of our request:

In considering this planning application under the Planning Act 2008, officers of East Suffolk Council (ESC) argue as follows;

8.1.4 Having regard to requirements under the Planning Act 2008, the proposed Sizewell B relocated facilities works do not in themselves constitute a generating station over 50MW and as such do not require development consent by the Secretary of State under the Planning Act 2008. In order to consider whether the proposals can be considered an NSIP or can be determined under the Town and Country Planning Act 1990 (as amended), two questions need to be answered: 1. What constitutes a “generating station”; and 2. Whether the proposed development involves an extension to a generating station, within the meaning of sections 235 of the Planning Act 2008 and 36(9) of the Electricity Act 1989.

8.1.5 “We are of the view that the generating station comprises those buildings within which electricity is generated. The buildings the subject of this application do not include buildings within which electricity is generated, rather they provide ancillary facilities.”

If you take this argument at face value, then the only buildings that can be considered to be the generating station are the turbine halls. This means that the nuclear reactor itself is not considered by ESC to be a “generating station” although without its steam production the turbine halls could

not be a “generating station” either. ESC, therefore, relegate the nuclear reactor to being an “ancillary facility”. This cannot be a sensible position to adopt.

If we now consider the role of the outage facilities that EDF are wishing to relocate, they are in use every 18 months, for a period of two months at a time, to enable refuelling and maintenance on the reactor and other infrastructure, including the turbine halls, which are vital components of the operating generating station. If the Outage facilities that are part of this application were not to exist, then the nuclear reactor would not be able to provide the steam for the generating turbines that ESC consider to be the “generating station”.

8.1.5 continues – “Therefore the works proposed do not involve work to the generating station itself. The next question is whether the proposed works comprise an extension to the generating station, notwithstanding that they do not involve any physical works to that station. We consider that as the proposed works relate to the overall operation of the generating station they are not directly related to the generation of electricity and therefore do not fall within the statutory definition of an “extension” to a generating station. Therefore, this Council can lawfully determine the application pursuant to our powers under the Town and Country Planning Act 1990 (as amended).”

If we now consider the question of whether the proposed works comprise an extension to the generating station, whilst these new facilities will replace existing facilities at Sizewell, they will have to be in place prior to the old facilities being removed otherwise Sizewell B will be unable to continue to be a generating station once the 18 month period since the last outage period has elapsed. The new facilities will consist of an extension as they will be in place in parallel to the existing facilities and they will occupy an area of EDF land not currently within the current industrialised footprint of Sizewell B or the Office for Nuclear Regulation (ONR) licensed site.

Regarding Coronation Wood, in the arboriculturalists report supplied by EDF, only trees 2 are found to be structurally poor, 13 are found to be structurally fair and the other 200+ are in good condition.

8.3.14 The loss of 229 mature/semi-mature trees predominantly within Coronation Wood (of which around 73% are assessed by the Arboricultural Assessment as being category C or less, i.e. trees of low quality – typically comprising plantation trees with limited life expectancy and limited public visual amenity value).

Our Response to the removal of Coronation Wood

EDF was required by the Secretary of State, in the 2011 planning consent for the Dry Fuel Store (DFS) at Sizewell B, to retain and enhance Coronation Wood as a screen for this building, we believe it should remain to fulfil that condition.

Although the majority of these trees are deemed to be Category C, the wood has a good life expectancy with limited management, natural regeneration and enhancement, as set out in the planning conditions for the DFS. In fact, regeneration is already evident in Coronation Wood and will continue for years and centuries to come, retaining the much needed screening and wildlife habitats it provides. Over 95% of these trees are deemed to be structurally and physiologically in good condition. There are many similar woods in this country of this type and quality which will be protected and managed and continue to evolve. Given this we would suggest the woodland as an arboricultural landscape feature should be categorised as A2 and/or A3 as it is a memorial wood in line with Table 1 of BS5837:2012 as “Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features” and therefore should be considered a clear constraint to future development.

We wish to protect this 110 year old historic woodland which provides important screening of the industrial site that is Sizewell A & B as well as a natural ecological support area adjacent to Sizewell Marsh SSSI totally within the Suffolk Coast and Heaths AONB. We also wish to retain its characteristics, in keeping with the planning condition for the DFS, which in the main relates to BS5837:2012 and are:

- A visual amenity enjoyed from various local points and seen from up to 2 miles
- Visual screening of large industrial buildings
- Help with environmental processes at the contiguous Sizewell Marsh SSSI
- The BS5837:2012 also recognises the contribution that trees make to climate change adaptation
- Wildlife habitat including endangered species (net loss is predicted)
- Noise buffer for residents and visitors
- The reduction of light spillage/ pollution onto and over SSSI & AONB land

Whilst many trees may be plantation trees, their loss as a screen for the DFS and other Sizewell buildings is seen by the Suffolk Coast and Heaths AONB as being significant, unlike the assessment of EDF and ESC. Suffolk Preservation Society, RSPB and Suffolk Wildlife Trust all give reasons for disagreeing with the views of EDF and ESC in regards Coronation Wood. It is true this screen is for viewpoints to the south and south west only, but that does not diminish its function for those viewpoints.

Coronation Wood has not deteriorated to such an extent, in the 8 years since DFS planning permission was granted by the Secretary of State, that the wood should now be removed.

The "maintenance and enhancement" condition for Coronation Wood in the 2011 planning consent granted to EDF should be enforced. EDF should not be allowed to fell this in order to replace with further 20 metre high buildings which will simply add to the industrial site which are Sizewell A & B. No screening will be available for these additions or the buildings that surround them to the east and north for decades.

The softening effect that this large woodland gives to the existing buildings would mean a dramatic loss to the landscape resulting in many stark and lifeless commercial buildings dominating the landscape. Therefore, we challenge the applicant's comments and ESC's acceptance that the removal of Coronation Wood would only have a minor impact on public visual amenity.

The proposal for this work is also contained within all stages of the Sizewell C Consultation documents in increasing detail. We believe that this proposal to move the Sizewell B infrastructure to make way for Sizewell C should be assessed as part of the overall Development Consent Order process and note should be taken there that Coronation Wood's retention and enhancement was a condition of the 2011 planning consent.

Should the Sizewell C project not go ahead for whatever reason, there would have been no need to move these facilities and Coronation Wood would remain in position as a screen as detailed above and continue as a screen for the DFS. It is also the case, that once Coronation Wood is removed and building works commence, it is highly unlikely that the building works would be removed and the 100 year old Coronation Wood would simply be unable to be replaced in anything shorter than the 100 years that it has taken to get to its current maturity. The screen for the DFS would be lost permanently to another 20 metre building and industrialised frontage, materials laydown area.

Kind regards

Sharon Q. Smith

Sharon Smith
On behalf of Theberton and Eastbridge Parish Council