

# **EDF ENERGY - SIZEWELL C – PROCEDURAL DEADLINE B**

## **REPRESENTATION FROM THEBERTON AND EASTBRIDGE PARISH COUNCIL**

**(TEPC IP: 20026558)**

Theberton and Eastbridge Parish borders the proposed construction site for the Sizewell C project. It hosts the entrance roundabout to the site and the village of Theberton will be surrounded by the proposed Sizewell Link Road from the A12 with two of its connecting roads to Saxmundham (to the west) severed permanently. The village of Eastbridge (~50 residents) is directly adjacent to borrow pits, the workers campus of 2,400 workers and will have spoil heaps up to 35m high in plain view and be affected by noise, dust, air and light pollution for the 10 to 12 year construction period

### **Response following Preliminary Meeting 1**

TEPC wish to speak at the Preliminary Meeting 2 on Wednesday 14<sup>th</sup> April and Councillor Stephen Brett (Chair) will speak on our behalf.

TEPC do not think that it is appropriate to start the formal examination of these proposals until a decision is made regarding the acceptability of the proposed changes to the Development Consent Order application for the Sizewell C Project (SZC) from NNB Generation Company (SZC) Ltd (NNB) is determined. Should they be accepted, the significant work of integrating the changes into the SZC application needs to be completed and time allowed for changes to Relevant Representations to be registered with the Examining Authority (ExA) prior to the formal start of the examination.

We also think that local government capability to respond in a democratic manner is significantly impacted as given below.

- Suffolk County Council elections and the appointment of a cabinet should be completed to allow SZC discussions between elected representatives and local councils to resume, likely not to be until the end of May.
- TEPC will be unable to meet virtually after May 7<sup>th</sup> due to the expiration of existing enabling Covid-19 enabling legislation.
- Whilst Parish Council meetings are classed as an allowed “permitted organised gathering” after May 14<sup>th</sup>, the only meeting hall within the Parish will not be opening to any meetings other than those which comply with the rule of 6 until all restrictions are lifted on or after June 12<sup>th</sup>. As a result, TEPC will be unable to meet and discuss our first written representations, required by Wednesday May 26<sup>th</sup>.

The DCO examination of the Scottish Power Wind Farms EA1N and EA2 (SPR) have recently been extended by 3 months and are now expected to be completed by July 6<sup>th</sup>. TEPC are involved in the SPR application regarding cumulative traffic impacts along the B1122 and our contributions to both DCOs will be challenged as a result, especially given the previous comments.

TEPC understand that the three Environment Agency operational licenses and the nuclear site license from the Office for Nuclear Regulation (ONR) will not be complete prior to the current date scheduled as the end of the SZC examination. We also now understand that the ONR license completion will be delayed from end of 2021 to mid-2022 placing its decision well beyond the point where the Secretary of State (SoS) will be expected to come to a conclusion and approve or reject the SZC application. The

results of these license application evaluations should be available to the ExA and Interested Parties prior to any recommendation being given to SoS.

A number of statutory consultees, councils, NGOs and individuals have raised issues with the lack of supporting information provided throughout the consultation phases and into the SZC application and proposed changes.

- The issue of the lack of a detailed plan for the Hard and Soft Coastal Defences is just one example. NNB clearly have plans that they are using for modelling and at PM1 agreed to share this modelling data but, for reasons we cannot fathom, are unreasonably withholding the plans upon which the modelling is based from public scrutiny. TEPC ask that the ExA ensure that these plans are released for examination alongside the modelling that NNB state has been completed and already presented to the Marine Technical Forum. TEPC can see no reason why these plans should now be withheld.

We observed that both Preliminary Meetings lost context due to issues of poor bandwidth, jumpy video and at times indistinct audio with speakers being cut off mid-speech for several seconds or longer resulting in staccato audio. This was difficult for those contributing to the hearings and also for those watching through the live stream. Should this continue throughout the hearings, it will reduce the effectiveness and validity of the examination to the detriment of all those who wish their voice to be heard and potentially result in challenge to the validity of the examination process.

TEPC believe that the examination should be conducted face-to-face as far as possible, and the start should be postponed until that is possible within Covid-19 restrictions enabling those whose connections are poor to engage with the examination properly.

TEPC also suggest that it should be possible for those who do not wish to attend in person for health or other reasons, are still able to contribute virtually via Teams or Zoom in a hybrid or blended manner.

TEPC also think that all examination events should be live streamed, no matter what format is eventually selected.

TEPC feel that it was inappropriate for the ExA to agree to NNB elaborating on the subject of the Rochdale Envelope, given that it is the subject of a PINS advice note. This allowed NNB to justify its use of broad parameters or, in some cases, insufficient parameters within the SZC application for Interested Parties to examine NNB's assessment of the potential significant environmental effects. The obvious example being the lack of location parameters and east/west depth assessments for the hard and soft coastal defence.

Sharon Smith on behalf of Theberton and Eastbridge Parish

cc: Cllr. Stephen Brett [REDACTED]  
Cllr. Paul Collins [REDACTED]