

Sizewell C Development Consent Order

Written Representations

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Index	Page
1. Summary of our objections to Sizewell C	2
2. Site and surrounding area	7
3. Description of the proposed development	9
4. Detailed objections to Sizewell C	10
4.1 Local Communities	10
4.2 Accommodation Campus	11
4.3 Borrow Pits and Spoil Management	14
4.4 Transport	17
4.5 Landscape	24
4.6 Built Heritage	30
4.7 Environment	32
4.8 Economic Impacts	40
4.9 Social Impacts	41
4.10 Cumulative Impact	44
4.11 Draft Development Consent Order	45
5 Reasons why the DCO should be rejected	47
6 Recommended planning conditions, planning legal agreements and other safeguards should Development Consent be given	54

1 Summary of our objections to Sizewell C

My family and I live at Long Drift in Eastbridge, just 400m from the proposed Sizewell C construction site. This is our response to the Sizewell C Development Consent Order (DCO).

The proposed development is an insult to the people of Suffolk and, indeed, the UK. A troubled French commercial company with two similar ongoing, very poorly performing, costly and late projects (Flamanville in France and Olkiluoto in Finland); and a third at Hinkley in Somerset, already £2.9b overspent and the subject of lengthy delays, is seeking to impose the same chaos in Suffolk. Should the development proceed it would result in just 900 permanent jobs but at the same time cause immeasurable damage to the existing flourishing visitor economy and with disastrous impacts on the rural economy, communities and the environment.

We find the scale of the proposed development and construction alarming and saddening for the future of our community and for this beautiful part of East Suffolk, the Suffolk Coast and Heaths AONB and the internationally renowned RSPB Minsmere nature reserve. We support the campaigns and representations made by Stop Sizewell C, TASC, the B1122 Action Group, the Minsmere Levels Stakeholder Group, the RSPB and the Suffolk Wildlife Trust in all these matters. We are also very pleased with the joint approach of Suffolk County Council and Suffolk Coastal District Council in many of these matters, the current response of the Environment Agency, the AONB Partnership and many others.

Based on the evidence presented we are deeply concerned that the development of the twin reactor project exceeds the practical capacity of the proposed Sizewell C site. The constrained power station platform is dictating unacceptable changes in site protection, layout and access that threatens the long-term safety and environmental integrity of the site and its surroundings and the legacy left for nearby communities and businesses once work has been completed.

The Sizewell C construction will also place an intolerable burden on this and neighbouring small rural parishes, on the thriving tourist industry in this special area, and especially on the uniquely sensitive and designated environments in which this project is proposed

We have concluded that the proposed development cannot be realised in a manner which is safe over the timescales envisaged between construction and final decommissioning. We are convinced that the proposed development would have significant negative impacts on neighbouring coastal communities and adjacent designated habitats. The claim that biodiversity will be enhanced and that the project

will demonstrate biodiversity net gain through distant, potentially inferior and yet to be established compensatory habitat creation fails to meet planning requirements; and will do irreparable long-term damage in a time of an existing biodiversity crisis.

We conclude that the cumulative adverse impacts of the proposed development considerably outweigh the claimed benefits and that, as a result, believe that the proposed development should be rejected.

Locally it is significant that no attempt has been made to provide an individual Community Impact Assessment for Theberton & Eastbridge, despite statements at Stage 3 that this would be done. See <https://edf.thirdlight.com/pf.tlx/FVFMA3FMgCGVZ>, page 69, para 4.4.58.

Government Policy

In 2011 the UK Government in its National Policy Statement for Nuclear Power Generation EN-6 concluded that for Sizewell, *This assessment has outlined that there are a number of areas which will require further consideration by the applicant, the IPC and/or the regulators should an application for development consent come forward, including amongst other things effects and mitigating actions of coastal erosion, effects on biodiversity including the SSSI that is partially included in the site boundary, and the visual impact on the AONB.* But at that time the Government concluded *concluded that none of these factors is sufficient to prevent the site from being considered as potentially suitable.*

Since 2011 much has changed in the energy industry and daily we hear of advances in renewables technologies. At Sizewell the site circumstances have changed to the extent that the NPS policies for Sizewell C can no longer be regarded as being up to date including changes to the nominated site area? These changes call into question whether the assessment of need for sites set out in the NPSs remains up to date?

Today the site and proposed development

- is at risk from climate change and sea level rise and fluvial flooding;
- would have an enormous adverse impact on adjacent internationally designated sites of ecological importance;
- would have an adverse impact on coastal processes on a very sensitive landscape;
- would have an adverse impact on sites of amenity, cultural heritage and landscape value;
- is too small to accommodate a development of this scale;
- would have enormous transport and socio economic impacts which the developer has shown no evidence of being in a position to mitigate.

We would argue, therefore, that the Sizewell site is not the '*potentially suitable site for new nuclear power stations before 2025*' identified by the UK Government in 2011 in EN-6.

The National Policy Statement states that it is appropriate for other matters to be considered by the Planning Inspectorate. This must include relevant local policies from the key plans, including the Suffolk Coastal Local Plan and emerging Local

Plan Review, the County's Local Transport Plan and its Minerals Local Plan Core Strategy (now the 2020 Suffolk Minerals and Waste Local Plan) and its emerging Local Plan Review, as well as other strategies such as the East Suffolk Business Plan 2015-2023 and the AONB Management Plan.

In these circumstances we believe that the proposals do not comply with the East Suffolk Council - Suffolk Coastal Local Plan, in particular policies SCLP3.4: Proposals for Major Energy Infrastructure Projects and SCLP3.5: Infrastructure Provision and Policies MP3 and GP4 of the 2020 Suffolk Minerals and Waste Local Plan.

Community Impacts

The proposed development would have a dramatic and cumulative impact on local communities, in particular Eastbridge and Theberton; and several settlements along the B1122. We believe that a development of this scale would be totally inappropriate in this very sensitive landscape and precious rural environment which would be severely damaged for several decades and the visitor economy badly damaged. The longevity of the construction activities would be particularly damaging, especially the following features of the development:

Accommodation Campus

The development would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures. No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900 relying entirely on scant available rental accommodation in the area impacting a vibrant tourism sector and the social housing sector. ***Is the applicant able to evidence that the proposed campus would result in no unacceptable harm to local communities and residential amenity?***

Borrow Pits and Spoil Management

This aspect of the development would be unacceptable due to its proximity to Eastbridge and several individual residential properties. This is because of the threat of the many environmental implications identified as relevant in the Suffolk Minerals and Waste Local Plan. Both aspects of the development would have a significant adverse impact on local communities and we believe that they do not satisfy policies MP3 and GP4 of the Plan. The proposals do not adequately assess or satisfactorily mitigate any potentially significant adverse impacts. ***Is the applicant able to evidence that the proposed borrow pits and spoil management plans would not result in unacceptable harm to local communities and residential amenity and would comply with policies MP3 and GP4 of the 2020 Suffolk Minerals and Waste Local Plan?***

Transport

The amount of road based transport proposed would have an enormous impact on local communities and result in long term damage to the East Suffolk visitor economy. The proposed route of the Sizewell Link Road is unacceptable. Alternatives exist, in particular to the south of Saxmundham, and have been dismissed as options by the applicant with no adequate or proven reasons given. The proposed delay in the start of construction of the Link Road (not to be completed until year 3 of the development) would mean that the B1122 would carry up to 3 years of substantially increased traffic with a consequential adverse impact on communities and road safety; at the same time as the Sizewell C construction traffic.

Is the applicant able to evidence that there has been a thorough examination of all link road options and that the applicant's favoured option (route Z) is the best in terms of its community impact and legacy value? And evidence that the combined impact of link road construction traffic and Sizewell C construction traffic would not have very substantial impacts on residential amenity.

Landscape

The proposed development site is not suitable because it will not mitigate the visual impact on the Suffolk Coast and Heaths AONB or the Suffolk Heritage Coast as envisaged by the Government in its National Policy Statement for Nuclear Power Generation (EN-6). The proposed development and link road would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'. It would also have an adverse impact on the quality and integrity of the many nationally and internationally important nature conservation areas in the locality.

Is the applicant able to evidence that the proposed development would not result in extensive and irreparable long term damage to the East Suffolk landscape and the AONB?

Built Heritage

The proposed development would have significant and adverse impacts on the historic environment of East Suffolk and the setting of many significant built heritage assets, including St Peter's Church Theberton and Leiston Abbey.

Is the applicant able to evidence that the proposed development would not result in unacceptable damage to the East Suffolk built heritage?

Environment

We strongly object to the DCO for numerous environmental reasons relating to pollution (air quality, light, noise, dust and particulates), flood risk, water supply, terrestrial ecology, marine ecology, Water Framework Directive and the mis-alignment of submission of Environmental Permits applications, the Nuclear Site License application and the DCO application.

Is the applicant able to evidence that the proposed development would not result in extensive and irreparable long term damage to the East Suffolk environment?

Social Impacts

We believe that the proposed development would leave a legacy of adverse social impacts on communities. These would be impacted by an influx of construction workers and there are likely to be effects on health in the receiving communities and on the incoming workforce; effects on accommodation; effects in relation to temporary on-site accommodation; effects on local businesses including tourism and the local supply chain and displacement effects on the labour market. ***Is the applicant able to evidence that the proposed development and the influx of thousands of construction workers for a period of at least 10 years into an otherwise quiet rural locality will not have unacceptable social impacts on communities in East Suffolk?***

Tourism and Economy

We believe the £250m local tourism industry will be damaged throughout the period of construction and beyond. Noise, dust, loss of access and visual impacts will deter visitors to the coast between Southwold and Aldeburgh. EDF has provided inadequate information about impacts on tourism. Moreover, with EDF needing to reduce 20% from the cost of Sizewell, it plans to use the Hinkley C supply chain. EDF must quantify how their savings will impact economic and employment benefits for the local area. ***Has the applicant demonstrated beyond doubt that the development would do no long term harm to the East Suffolk visitor economy and that the claimed long term benefits to employment, skills and education would compensate for harm to the existing economy?***

Cumulative Impact

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast is enormous and would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. These include Sizewell C, Sizewell B, the SPR proposals for onshore wind farm infrastructure at Friston and other planned projects (Greater Gabbard, and Galloper wind farm expansions, Nautilus, Eurolink and two Sizewell to Kent interconnectors). The adverse impacts of these development projects to Suffolk life would be overwhelming for communities and result in significant industrialisation of the area. ***Is the applicant able to provide evidence that there is no need for Government to urgently address policy related to the cumulative impact of proposed energy infrastructure projects in East Suffolk?***

Draft Development Consent Order

We are extremely concerned that the proposed provisions of the Draft DCO, prepared by the applicant, are carefully scrutinised by the ExA, in particular because of its many impacts on local communities most impacted by the form of the proposed development and must not be used by the applicant as a way of expanding use of the Rochdale Envelope or avoiding scrutiny of critical infrastructure within the examination period and afterwards. ***Is the applicant able to evidence that the***

Draft DCO provides sufficient protection for local communities for the period of construction and thereafter during operation?

2 Site and Surrounding Area

The Parish of Theberton and Eastbridge is located in and adjacent to the Suffolk Coasts and Heaths Area of Outstanding Beauty; close to the North Sea and RSPB Minsmere nature reserve and adjacent to very significant areas of wetland, heath and woodland.

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village.

A Grade 2 listed Public House sits in the centre of the village, opposite the Grade 1 listed St.Peter's Church with its rare round tower and thatched roof plus a Grade 2 War Memorial. They are separated by the B1122.

The very popular village hall next to the church hosts a variety of activities from adult education classes to childrens' parties. Community activities centering on the hall include the Duke of Edinburgh award scheme which involves students camping and navigating the local footpaths and roads. A newly equipped and upgraded playing field for young children along Church Road is already much used.

Two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside complete the village picture alongside the local residents. Duke of Edinburgh students frequently use the small lanes and footpaths to Eastbridge.

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street lights, street signs or speed limits. It borders an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest, which is the location of RSPB Minsmere. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, two certified campsites, for visitors to enjoy the dark skies and the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or the National Trust's Dunwich Heath.

The villages have a mix of properties owned and rented into both the tourist and private rental sector. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, and the very varied wildlife associated with the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest.

Residents and visitors benefit from the proximity of Minsmere as well as other important destinations including the Leiston Long Shop Museum, National Trust Dunwich Heath, Walberswick Marshes and the towns of Leiston, Thorpeness, Aldeburgh, Walberswick and Southwold close by.

Theberton and Eastbridge are popular visitor destinations themselves located midway between the very significant destinations of Thorpeness and Aldeburgh and Walberswick and Southwold and an important part of the thriving East Suffolk visitor economy. Eastbridge is located just 400m from the proposed Sizewell C construction site (proposed borrow pits) and just 700m from the proposed residential campus. The two communities would be mostly impacted by activities on the Temporary Construction Area and the proposed Sizewell Link Road.

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) is a distinctive area of legally protected countryside, towns and villages in east Suffolk. It is cherished for its relatively undeveloped, tranquil landscape and stunning natural and cultural history. The AONB stretches from Kessingland in the north to Shotley Peninsula in the south, and is characterised by shingle beaches, heathland, forest, estuaries and iconic coastal towns.

RSPB Minsmere is the organisation's flagship nature reserve and visitor destination, attracting 125,000 people a year. RSPB Minsmere is internationally famous because of its successes in conservation of rare species since World War II.

It has a long history of successful conservation in the UK and has become a place of international importance and significance to the history of conservation, including for very rare breeding birds such as Avocet, Bittern, Marsh Harrier, Stone Curlew, Dartford Warbler, Woodlark and Nightjar and animals such as Red deer, badger and bats. The diversity of wildlife, flora and fauna, is reflected in more than 6,000 identified species.

Damage to the Minsmere nature reserve complex would result in considerable damage to the local visitor economy because of reduced visitor numbers and, as a consequence, a reduction in spending on associated visitor accommodation, the service industry and town centres.

We support the RSPB and Suffolk Wildlife Trust in their argument that damage to the nature reserve as a result of the proposed development would harm the UK's

reputation in its attempt to provide world leadership in sustainable development, particularly in the run up to the UN Climate Change Conference in 2021.

3 Description of Proposed Development

The proposed development is the construction of twin EPR nuclear reactors at Sizewell, on a site immediately to the north of Sizewell B and adjacent to the southern boundary of RSPB Minsmere and the Suffolk Wildlife Trust Sizewell Marshes SSSI. A host of related infrastructure away from the main development site is also proposed; to serve the construction period and during operation (including road, sea and rail transport infrastructure, and park and ride facilities) In the Stage 4 consultation EDF stated that the development would take in the region of 10 to 12 years to complete. The DCO suggests a 10-12 year construction period.

The application site comprises a total site area of 1011.6ha; of which 371.7ha are onshore and the remaining 639.9ha are offshore. The temporary construction area extends across woodland plantations at Dunwich Forest and Goose Hill and relatively large arable fields defined by hedgerows and linear tree belts. The proposed construction site would extend from Sizewell B to the Eastbridge Road at map ref TM 453 655, just 400m from the southern boundary of the village.

In the Stage 3 consultation the applicant clumsily promoted the development by stating that the level of construction proposed would be comparable to the 2012 London Olympics. This clearly illustrated that the scale of the proposed development would overwhelm a very fragile and precious rural environment. Transport to and from the site before and after construction would predominantly be by road as well as by train and sea generating a huge number of vehicle movements each day. The construction workforce would be 7,900 workers at its peak, plus another 600 in supporting roles. Once in operation, the power station would create 900 permanent jobs. Worker accommodation would involve the construction of 30 blocks of 3 and 4 storey flats (up to 36m high) for 2,400 workers in a residential campus served by a new road junction off the B1122 and located 700m from Eastbridge. The nearest part of the campus to Eastbridge would comprise decked car parking (up to 20m high) for 1300 vehicles. The campus would house ancillary facilities for residents and would generate constant movement of workers to and from the site.

The applicant also proposes the construction of borrow pits just 400m from Eastbridge as part of its construction material plan. Storage of materials is proposed to be up to 20m high.

Temporary spoil management areas would be located 800m from Eastbridge and up to 50m in height.

Material management at the borrow pits and spoil stockpiles would result in very substantial loss of amenity in local communities, in particular at Eastbridge for the reasons we have described below.

4 Detailed objections to Sizewell C

There are a number of issues that we believe are material to the consideration of this Development Consent Order.

The proposed development would have a dramatic and adverse impact on the communities, landscape and socio economic environment of East Suffolk and for these reasons we believe that the DCO should be rejected. Our areas of concern were listed in the Relevant Representations submission to the ExA dated 30 September 2020.

This section of our written representation is also based on the Planning Inspectorates *Assessment of Principal Issues* listed following the Preliminary Meeting and other guidance offered by the ExA since that time.

We object to the DCO on grounds of jobs and economic development, national policy, climate change, cumulative impacts of energy developments in Suffolk, Flooding, Health, Coastal issues, including coastal geomorphology and natural heritage.

4.1 Local communities

We believe that the proposed development would have a catastrophic impact on local communities, in particular Eastbridge and Theberton; and the several settlements along the B1122. And that a development of this scale would be totally inappropriate in this very sensitive landscape and precious rural environment. These would be severely damaged for several decades and the visitor economy badly damaged permanently. The longevity of construction activities would be particularly damaging.

The cumulative impact of the Sizewell C development and the other onshore energy infrastructure projects proposed relating to the Sizewell B proposals, the offshore wind farm industry and the European and UK interconnector projects has not been adequately taken into account by the applicant and, indeed, the UK Government in its energy infrastructure planning.

Theberton and Eastbridge and the B1122 communities would experience considerable loss of the residential amenity that they currently enjoy because of

noise, dust, light pollution and loss of dark skies, traffic movements, pollution from vehicle movements, the proximity of the proposed residential campus and the proposed borrow pits and spoil heaps and from the construction site generally.

The presence of thousands of construction workers for at least a decade and in what is presently a peaceful rural environment would be very damaging. For many older people in this community this would be for the remainder of their lives.

It would not be possible for the applicant to have adequate regard to the protection of the existing residential and rural environment nor to provide adequate mitigation. Moreover it would not be possible for the local authorities and other public bodies that could otherwise be expected to ensure the safeguarding of local communities to be adequately resourced to do so.

The Government's decision on the DCO will have an enormous impact on the lives and livelihoods of local people. The proposed development would not just harm the B1122 communities but also the communities in the wider East Suffolk area, including those dependent on the visitor economy and those impacted by transport for the duration of the construction period and during operation of the proposed Sizewell C development.

Our objections to the proposed development are evidenced by Suffolk County Council in its Relevant Representations submitted on 28th September 2020 at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/Suffolk-County-Council-Relevant-Representation-submitted-to-PINS.pdf>

These state that, The Council does not consider the DCO proposals sufficiently avoid, minimise, mitigate, or compensate for the impacts it will have on the communities and environment of Suffolk. To be acceptable and to make the development work for Suffolk, it is essential that these impacts are minimised, by following the mitigation hierarchy (avoid – minimise - mitigate – compensate), prioritising sustainable transport modes and by addressing the sensitivity of its location and any community impacts arising.

4.2 Accommodation Campus

The proposed Accommodation Campus is for 2,400 construction site workers. And, it would have the capacity to be extended to provide additional accommodation. This part of the development would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures.

No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900 relying entirely on scant available rental

accommodation in the area impacting a vibrant tourism sector and the social housing sector.

It is not clear what range of waste recycling and energy supply infrastructure is proposed on the campus; whether these facilities are interrelated (e.g. energy from waste facility) and how they will be managed and whether there would be an impact on local communities

Following the applicant's Stage Two public consultation Suffolk County Council requested the developer to review potential alternative sites for the Accommodation Campus. The County Council commissioned an independent report as its contribution to this review.

Alternative sites for the proposed campus have been suggested but the applicant's justifications for selecting the single Eastbridge Lane site are poorly evidenced. Suggestions that a site which could leave a long-term legacy for affordable housing have been rejected without valid justification.

Suffolk County Council Boyer and Canon Report

Boyer and Canon Consulting Engineers were commissioned by the County Council to assess whether there were any genuine alternative sites for the Sizewell C Accommodation Campus. This included the applicant's preferred location. The County Council were keen to explore legacy potential and also the impacts on the environment and local communities.

The Boyer Sizewell C Accommodation Campus Review is at

<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/170711-FINAL-Report-Boyer-21.06.2017.pdf>

The study showed the applicant's preferred site met its own criteria regarding proximity and efficiency but was less favourable when considered against impacts on communities and the environment. The study concludes that there are other sites that would have reduced environmental impacts on the area and that could be considered as part of a full and proper accommodation strategy. The study concluded that the two Councils and the applicant should potentially discuss potential sites for an accommodation campus as part of that strategy.

Suffolk County Council and Suffolk Coastal District Council response to the proposed Accommodation Campus

We welcome and support the County Council and the former Suffolk Coastal District Council response to the Accommodation Campus proposals and cite it as evidence for our objections.

In response to the stage 3 consultation the County Council March 2019 Cabinet agreed the following, *The location of the accommodation campus remains a local concern: EDF Energy is requested to provide further evidence to demonstrate why it considers its favoured location to be the optimal location. This Council would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. This Council would like EDF Energy to also reconsider the nearby Leiston airfield site as an alternative location for the campus. Subject to receipt of that justification, whatever accommodation campus site is chosen the evidence will need to prove that environmental impacts can be sufficiently mitigated and compensated for.*

See Cabinet report at <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/SCC-Cabinet-Report-Cabinet-Report-Sizewell-C.pdf>

In response to the stage 3 consultation Suffolk Coastal District Council Cabinet received a report on the proposed Accommodation Campus that stated, *8.67 EDF Energy is requested to provide further evidence and a business case to demonstrate why they consider their favoured location to be the optimal location. The Councils would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. Suffolk County Council would also like EDF Energy to reconsider the nearby Leiston airfield site as an alternative location for the campus.....Subject to receipt of such business case and justification of location, whatever accommodation campus site is chosen will need to prove that environmental impacts can be sufficiently mitigated and compensated.*

In its response to the stage 3 consultation Suffolk Coastal District Council agreed the same recommendation as the County Council. See ESC/SCDC Cabinet report at <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/SCDC-Cabinet-Report-Agenda-item-6-CAB-23-19-Sizewell-C-Stage-3-Public-Consultation.pdf>

AONB Partnership Relevant Representations September 2020

We also cite as evidence that the Campus is proposed in the wrong location the AONB Partnership that considers that, *'the design of the accommodation campus does not pay due regard to the statutory purposes of the AONB. Although located outside the AONB this element is within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty characteristics (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]) and statutory purposes of the AONB. This will include the Relative Tranquillity and Relative Wildness indicators.'* See <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Suffolk-Coast-and-Heaths-AONB-Partnership-Rel-Reps-SZC.pdf>

Conclusions

We believe that the DCO should be rejected for the following reasons:

- The proposed residential campus would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures.
- Alternative sites for the proposed campus have been suggested but justifications for selecting the single Eastbridge Lane site are poorly evidenced.

4.3 Borrow Pits and Spoil Management

The proposed development would involve the excavation of substantial 'borrow pits' to the east of the approach road to Eastbridge. These would cover an area of 17 hectares and be excavated to within 2 metres of the groundwater level. The borrow pits would be used to extract materials for the main construction site and thereafter to fill them with construction site waste to a height of 20m. The borrow pits would, at their nearest, be just 200m from houses in Eastbridge and just 400m from Long Drift. The borrow pits, part of the planned earthworks for the development, would be constructed in year 1 of the development and be operational until year 5, a duration of 4+ years.

Immediately to the south of the proposed borrow pits and adjacent to the eastern boundary of the proposed accommodation campus the applicant proposes the construction of a temporary spoil heap of site materials covering an area of 25 hectares and up to a height of 50m. The spoil heap(s) would be located just 750m from the southern edge of Eastbridge.

We argue that this part of the development is completely unacceptable because of its proximity to Eastbridge because of the threat of the many environmental implications covered in adopted planning policy.

Suffolk Minerals and Waste Local Plan - July 2020

The National Policy Statement states that it is appropriate for other matters to be considered by the Planning Inspectorate. This must include relevant local policies from the key plans, including the 2020 Suffolk Minerals and Waste Local Plan (SMWLP).

The SMWLP was adopted in July 2020. It is part of the Development Plan and provides the framework for the determination of planning applications for minerals and waste development. Local communities will rely on the safeguarding duties of the two Councils and other statutory agencies to ensure that technical matters associated with this part of the development are addressed appropriately and that the Planning Inspectorate is able to be satisfied that the provisions of the Local Plan have been addressed in the context of the DCO.

The relevant policies of the Suffolk Minerals & Waste Local Plan are shown below

Policy MP3: Borrow pits

Borrow pits to provide sand and gravel to serve major civil engineering projects will be acceptable as long as: a) they are within 10 km of the project site; b) the borrow pit is worked and reclaimed as part of the project; c) they comply with the general environmental criteria Policy GP4.

Policy GP4:

General environmental criteria Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following: a) pluvial, fluvial, tidal and groundwater flood risk; b) vehicle movements, access and the wider highways network; c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural Beauty and the Broads; d) biodiversity including Natura 2000 sites, ancient woodlands and trees; e) geodiversity; f) historic environment, archaeology, heritage assets and their setting; g) public rights of way; h) neighbouring land-use; i) soil resources including the best and most versatile agricultural land; j) noise and vibration; k) air quality including dust and odour; l) light pollution; m) the local water environment; n) land instability; o) airfield safeguarding; p) the differential settlement of quarry backfilling; q) mud and aggregates on the road; r) litter, vermin and birds; s) The use of alternative forms of transport including the use of rail freight shipping should be considered; or t) military and civil aviation. Proposals should meet or exceed the appropriate national or local legislation, planning policy or guidance for each criterion, including reference to any hierarchy of importance. Proposals should aim to achieve a biodiversity net gain. Proposals should demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance, that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.

The proposed Borrow Pits and Spoil Management issues have been addressed by Suffolk County Council and the former Suffolk Coastal District Council.

Before adoption of the SMWLP the March 2019 Suffolk County Council Cabinet and the Suffolk Coastal District Council Cabinet on the Stage 3 consultation both agreed the following recommendation, *This Council requires additional information and evidence to convince it that the proposed borrow pits 6 and stockpiling will not have an unacceptable impact on the sensitive local environment (including on the AONB and the Royal Society for the Protection of Birds (RSPB) Minsmere) and on neighbouring land uses;*

<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/Final-SCC-SCDC-Stage-3-Response-submitted.pdf>

Conclusions

We believe that the DCO should be rejected because of the cumulative impact of the proposed borrow pits and the spoil heap(s). Both proposals would have a significant adverse impact on local communities and they would not satisfy policies MP3 and GP4 of the Suffolk Minerals & Waste Local Plan 2020.

In terms of Policy GP4 the proposed borrow pits and spoil heap do not adequately assess or satisfactorily mitigate (and address where applicable any potentially significant adverse impacts including cumulative impacts) the following:

- pluvial, fluvial, and groundwater flood risk;
- vehicle movements, access and the wider highways network;
- landscape character, visual impact, setting, and designated landscapes including the Suffolk Coast and Heaths AONB;
- biodiversity including important hedgerows and trees;
- geodiversity;
- historic environment, archaeology, heritage assets and their setting;
- public rights of way;
- neighbouring land-use, in particular the nearby residential communities;

- soil resources including the best and most versatile agricultural land;
- noise and vibration;
- air quality including dust and odour, in particular impacting nearby residential communities;
- light pollution in particular impacting nearby residential communities, the 'dark skies' enjoyed by local communities and an important component of the visitor economy;
- the local water environment;
- land instability;
- the differential settlement of quarry backfilling;
- mud and aggregates on the road;
- litter, vermin and birds.

The proposals do not meet or exceed the appropriate planning policy or guidance. The proposals do not demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance (local communities), that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.

Moreover, should the DCO be approved the Local Planning Authority and Public Protection Authority need to be in a position to ensure that the applicant addresses local Air Quality through

- its air Quality impact baseline assessment methodology;
- dealing with effects on air quality arising from dust and particulates during the construction phase including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- dealing with effects on air quality arising from dust and particulates during the operational phase including through changes in vehicular activity and changes in distances between sources of emissions and air quality sensitive receptors;
- mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP);
- dealing with effects on air quality arising from dust and particulates during the decommissioning of the Proposed Development including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- the adequacy of the environmental measures incorporated into the design and mitigation proposal and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

4.4 Transport

We believe that the East Suffolk transport network north of Ipswich is inadequate to cope with the proposed development, especially the A12 and A1094 and the B1122. Other B roads in the locality (B1125, B1119, B1069) would be similarly threatened with heavy traffic and associated congestion. There is also a complex pattern of historic, rural country lanes that would be impacted largely by vehicles not contracted to use either the B1122 or the proposed Sizewell Link Road. Many of these roads would be impacted on occasions when road traffic incidents occur.

We believe that the proposed transport strategy for the development is inadequate and unacceptable. The development would give rise to substantial and adverse impacts on the transport infrastructure, and the applicant has not been able to mitigate these impacts. The use of a mix of road, rail and sea transport; the worker accommodation strategy and the construction of new roads would be insufficient to prevent undue damage to local communities and the East Suffolk visitor economy.

This situation would be considerably worsened taking into account the cumulative impact of this and other energy infrastructure projects that are proposed for the Leiston area (the 'Suffolk Energy Coast'). These could include the Scottish Power Renewables onshore wind farm proposals at Friston, various European interconnector projects as well as the approved Sizewell B works, already permitted to accommodate the Sizewell C development.

A relief road between the A12 and the development site could ease this situation dramatically. EDF agrees with this and has proposed the Sizewell Link Road as its preferred response. In April 2019 EDF appointed a consultant engineer, AECOM, peer review and report to justify its choice of route. We believe that the AECOM report is inadequate and misleading.

In July 2019 a joint Suffolk County Council and Suffolk Coastal District Council officer review of the AECOM report was undertaken. This report is highly critical of the review. The County Council as highway authority has continued to ask EDF to justify its choice of routes through modelling of capacity, road safety and journey times.

We believe that the proposed Sizewell Link Road would result in damage to local communities, built and natural heritage, landscape and agriculture. Moreover the construction of the proposed road would not be completed until 3 years after the start of work on the main development site, thereby leaving the B1122 communities with the disturbances resulting from early years Sizewell C construction traffic at the same time as the construction of the proposed Link Road. Yoxford would experience considerable congestion throughout construction because of the proximity of the

proposed A12/B1122 roundabout and the A1120.; an intolerable position for all the communities involved.

We are of the view that if route Z is considered by the ExA to be the incorrect choice for transportation to the proposed construction site it should be for the applicant to identify appropriate options for adaptations to the East Suffolk transport network that would satisfactorily resolve the issues identified by many respondents to the DCO, including Suffolk County Council as Highway Authority. These options might include a link road route to the south of Saxmundham and sensitive adaptations to the existing B1122 .

Public Rights of Way

The plans for the proposed Sizewell Link Road show a number of public footpath closures or 'at grade' crossings of the proposed new road. We object to both permanent closures of public rights of way and 'at grade' crossings, because people will simply stop using what are often treasured and historic routes and an important component of the visitor economy. The applicant needs to give consideration to building accessible footpath flyovers at strategic locations where the most important routes can be joined together. As well as the Highway Authority, local communities and The Ramblers need to contribute to such plans. The plans for rail crossings also need similar careful consideration and avoidance of public footpath closures.

DCO Planning Statement and Transport Assessment.

Our arguments are evidenced by the applicants DCO Planning Statement and Transport Assessment in support of the development.

The applicant addresses proposed construction transport issues and operational issues through its DCO Planning Statement and its Transport Assessment. The applicant proposes a complex strategy, involving rail and sea transport, the construction of two new roads, a park and ride and bus system, a freight management facility, a construction worker travel plan, encouragement of the use of sustainable travel modes and facilities for non-motorised users at and off site.

In its Planning Statement the applicant makes following reference to the Transport Assessment as follows;

The Transport Assessment (Doc Ref. 8.5) has assessed the potential for substantial impacts on the surrounding transport infrastructure and proposed a range of mitigatory measures. These include:

- Using both rail and sea transport to reduce the number of deliveries being made by road.*
- Constructing two new roads to bypass the villages of Stratford St Andrew and Farnham (two village bypass) and link the A12 to the main development site (Sizewell link road), which would otherwise experience significant traffic impacts.....*

The Transport Assessment makes the following conclusions

14.7.1 NPS EN-1 recognises that a new energy Nationally Significant Infrastructure Project can give rise to substantial impacts on the surrounding infrastructure, and that the decision maker should ensure that the applicant has sought to mitigate these impacts, see paragraph 5.13.6 of this Transport Assessment (Doc Ref 8.5). This Transport Assessment (Doc Ref. 8.5) identifies these impacts and proposes mitigatory measures.

14.7.2 As SZC Co. is willing to enter into the agreements or requirements necessary to deliver any required mitigation, development consent should not be withheld and appropriately limited weight should be applied to any residual effects on the transport network.

14.7.3 The Transport Assessment (Doc Ref. 8.5) has assessed the potential for significant impacts on the surrounding transport infrastructure and proposed a range of mitigatory measures. These include:

- the provision of worker accommodation close to the main development site;*
- using both rail and sea transport to reduce the number of deliveries being made by road;*
- constructing two new roads to bypass the villages which would otherwise experience the most significant traffic impacts;*

implementing a park and ride system in order to mitigate the impact of construction worker car trips on the highway network surrounding the main development site;

- using a freight management facility and other measures to control the movement of vehicles delivering materials to the main development site;*
- designing the main development site and associated off-site developments in such a way as to encourage the use of sustainable travel modes, supported by the Construction Worker Travel Plan (Doc Ref. 8.8); and*
- incorporating facilities for non-motorised users at the main development site and associated off-site developments.*

The applicant clearly understands and agrees that the proposed development would give rise to substantial impacts on the surrounding infrastructure, and that the decision maker should ensure that the applicant has sought to mitigate these impacts and that SZC Co. is willing to enter into the agreements or requirements necessary to deliver any required mitigation,

We agree with this assessment but argues that the proposed transport strategy for the development is inadequate and unacceptable. The development would give rise to substantial impacts on the surrounding transport infrastructure, and the applicant has not evidenced that it will be able to mitigate these impacts. The use of a mix of road, rail and sea transport; the worker accommodation strategy and the construction of new roads, in particular the proposed Sizewell Link Road would be insufficient to prevent undue damage to local communities and the East Suffolk visitor economy.

The applicant also contends that development consent should not be withheld and appropriately limited weight should be applied to any residual effects on the transport network. We

argue that this must not be the case. Transport to the development site is a critical component of a development of this scale and complexity. The proposed Sizewell Link Road would be incorrectly located, provide no legacy for the area, damage farming and local communities and if the development is to proceed the ExA must demand a re-think of the transport strategy with a view to identifying an acceptable route for a relief road.

Sizewell Link Road

With these objections in mind we support the views of the Highway Authority, Suffolk County Council, expressed by its Cabinet in response to the stage 3 consultation on 12th March 2019 <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/SCC-Cabinet-Report-Cabinet-Report-Sizewell-C.pdf>

Suffolk CC Cabinet report of SZC transport options (extracts)

ii) The route of the proposed Sizewell Link Road from the A12 to the development site in the road-led strategy: The provision of a relief road for the B1122 is welcome but the option proposed is yet to be supported by sufficient evidence. The case to justify the best possible route must revisit all the routes considered by the promoter with a comprehensive highways analysis and be mindful of any impact on allocations in the District Council's Local Plan and any other potential developments;

iv) The phasing of associated transport infrastructure: This Council requires a firm commitment for early delivery of the associated transport infrastructure to avoid disruption to the main haul route (A12-B1122) during the construction period;

As further evidence of our case Suffolk County Council's relevant representation dated 28th September 2020 <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/Suffolk-County-Council-Relevant-Representation-submitted-to-PINS.pdf> also states the following

Sizewell Link road: *The route selection for the Sizewell Link road has not, in the Council's opinion, been robustly justified, with alternative routes further south referred to by the applicant in its Stage 3 consultation likely to offer a better transport solution with more legacy benefits for Leiston.*

Whilst the Council considers a new Link Road necessary to mitigate the impacts of construction traffic, it does not consider the Sizewell Link Road with its proposed routeing to have strategic legacy benefit after construction, as the proposed route runs parallel to an existing road (the existing B1122) which would appear to be suitable for the operational traffic of Sizewell C. A new permanent road would have a permanent detrimental impact on landscape and ecology, would result in permanent loss of agricultural land (predominantly grade 2 and 3), and would place an additional maintenance burden on the highway authority. Therefore, the Council's preference is for the Sizewell Link Road to be removed on completion of the Sizewell C project, to minimise long term environmental damage in the area.

AECOM Report

In April 2019 the applicant obtained a Peer Review of the proposed Sizewell Link Road. This was carried out by consultant engineers AECOM. Using an assessment methodology AECOM concluded that the applicant's preferred relief road route

scored the best against the assessment criteria and is recommended as the preferred option from the four route options assessed.

East Suffolk Council and Suffolk County Council response to the “Peer Review of Option Selection for Sizewell Link Road” (July 2019)

The AECOM report was reviewed by officers of Suffolk County Council and East Suffolk Council in July 2019. We have access to this officer report and has extracted components that illustrate the inadequacy of the report in the detailed analysis of all route options, including route W versus route Z.

The Aecom report was prepared by EDF Energy in response to Suffolk County Council’s specific comments during Stage 3 consultation that whilst the principle of a relief road to mitigate operational and construction traffic on the B1122 was agreed, the selection of the route of the link road was not supported by evidence.

3. At Stage 2, the joint response of the Councils expressed significant concerns that the proposals for the B1122 from the A12 to the site were not adequate for the level of traffic proposed in relation to the construction of the Sizewell C project. EDF Energy was requested to look further at the main route from the A12 to the site and propose mitigation measures that meet the impacts created by their development proposal. The impact on local communities of the anticipated increase in traffic volumes in particular of HGVs and buses along the B1122 had been highlighted in the Accent report (May 2016) commissioned by SCC. This report stressed the concerns of local residents about the increase in traffic volume, speed, and proportion of HGVs, and the related impacts of noise, vibration, accident risk, and extra time added to car / bus journeys. The Councils would have expected some reference to be made in this peer review to the evidence of need for significant mitigation along the B1122 included in Accent Report.

5. At Stage 3, the Councils said ‘In summary, with regard to the route of the proposed Sizewell Link Road from the A12 to the development site in the road-led strategy, the Councils consider the provision of a relief road for the B1122 is welcome, but the route proposed is yet to be supported by sufficient evidence. The case to justify the best possible route must revisit the routes considered by the promoter, with a comprehensive highways analysis and be mindful of any impact on allocations in the District Council’s Local Plan and any other potential developments.’ The Councils then referenced the unresolved issues and lack of assessments of impacts of the proposed route.

8. Suffolk County Council as the Local Highways Authority requested at Stage 3 that ‘EDF Energy revisit the southern route (route W) as a potential superior alternative route to the proposed northern route (route Z), with regards to transport benefits, legacy potential and scheme impacts. Transport benefits should be evidenced through modelling of capacity, road safety and journey times. The County Council further requires much more detailed evidence for each of these options to come to a view of their comparative benefits.’

The officer report concludes

23.15 It may be that for many of the above categories, Route Z would after adequate assessment score better than Route W or vice versa, however, we do not believe that the high level assessment provides the evidence, in any meaningful way, whether this is the case, and so should not be taken into consideration as part of any decision making process on which route should be selected. Further evidence is necessary to determine whether the route selected by EDF Energy, Route Z, is in fact the best choice when taking into consideration all factors. It is considered that there will be only a

marginal difference between the scores, but what weighting to give those scores is likely to require further evidence.

We fully supports the findings of the joint Council officer assessment of the adequacy of the AECOM report to determine a best relief road route, namely:

- that the principle of a relief road to mitigate operational and construction traffic on the B1122 was agreed
- that the selection (by the applicant) of the route of the link road was not supported by evidence
- the concerns of local residents (including people living alongside the B1122) about the increase in traffic volume, speed, and proportion of HGVs, and the related impacts of noise, vibration, accident risk, and extra time added to car / bus journeys need to be part of the analysis
- that the case to justify the best possible route must revisit the routes considered by the applicant, with a comprehensive highways analysis
- that the applicant should revisit a southern route as a potential superior alternative route to the proposed northern route, with regards to transport benefits, legacy potential and scheme impacts
- that transport benefits should be evidenced through modelling of capacity, road safety and journey times
- that the highway authority (County Council) requires much more detailed evidence for each of these options to come to a view of their comparative benefits
- that the County Council requires much more detailed evidence for each of these options to come to a view of their comparative benefits
- that the AECOM peer review does not fully answer concerns that the SLR may not be the most appropriate mitigation for the impact of SZC traffic and the Council's request that further work is provided to give an evidence based approach.

We further comment that the AECOM study clearly takes no account of the cumulative impact of Sizewell C and other proposed and substantial energy infrastructure projects on this part of the Suffolk coast. In other words if these go ahead in some form or other there would be a clear legacy need for a sustainable transport route serving these developments during construction and beyond, in particular from the south and west.

For the assessment criteria 'Environmental Topics - Other' the AECOM study says at paragraph 4.6

EDF Energy has undertaken a high-level environmental appraisal of the four proposed routes (and their variations) based on the potential effects on PRowS, local road character, heritage assets, landscape designations, landscape character and views, and residential amenity.

And at paragraph 5.12

Other environmental impacts have been assessed by EDF Energy as set out in the Stage 3 Consultation documents and the conclusions drawn by this work inform the scoring for each option.

It is very clear, therefore, that this part of the assessment, because it is not an impartial review, should be discounted.

We can therefore, argue that the AECOM Report that the applicant has used to justify the preferred alignment of the proposed Sizewell Link Road is not impartial, contains many inaccuracies that have been identified by Council officers and should be discounted by the ExA in its assessment of the route options.

Transport Conclusions

- A road dominated transport plan is not sustainable; it would have a substantial carbon footprint and contribute to climate change.
- Road based transport would have an enormous and adverse impact on local communities and result in long term damage to the East Suffolk visitor economy.
- The proposed Sizewell Link Road would follow a route parallel to the B1122; it would sever and isolate communities, damage the rural footpath system and disrupt and divide farmland.
- The proposed Sizewell Link Road would have no legacy value for local communities and the completed development. It is unlikely that it would be adopted by the Highway Authority.
- Alternative routes exist and have been dismissed as options by EDF with no adequate reasons given. The previously explored new road route south of Saxmundham would have genuine legacy value.
- The applicant agrees that the B1122 is inadequate to cope with anticipated traffic volumes – so a time delay between the start of the proposed development and a subsequent start of construction of the Relief Road becomes even more significant to local communities.
- There would be irreversible long term damage to existing tourist footpath and cycle routes and, therefore, to the visitor economy.
- The proposed delay in the construction of the proposed Sizewell Link Road not to be completed until year 3 of the development would mean that the B1122 would carry up to 3 years of substantially increased traffic with a consequential adverse impact on communities and road safety.
- Delays in the construction of the Sizewell Link Road as a result of challenges to the CPO would mean an even longer delay to the start of construction.
- There is an urgent need for a pragmatic and comprehensive travel plan in this locality to resolve transport issues associated with the cumulative impact of several proposed energy infrastructure developments, including Sizewell B, Sizewell C, SPR onshore development at Friston and interconnector infrastructure.

4.5 Landscape

This section of our written representations describes the significance of the local landscape in terms of its human and natural history; the importance of the nationally designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and coastal habitats. It describes how the Government has agreed to support a recent extension to the AONB; it illustrates how the Government has recently, through its 2018 25 Year Environment Plan and 2019 Landscape Review proposed that this and similarly designated AONBs plus National Parks should be considered National Landscapes; it describes the response of the AONB Partnership to the Sizewell C proposal and the objections of the National Trust, Suffolk County Council and East Suffolk Council.

We conclude that the proposed development would result in enormous damage to this landscape and cut the AONB in two throughout construction and during this time result in considerable and permanent damage to the flourishing tourism industry.

Our views are evidenced by the statements of the AONB Partnership, the National Trust, Suffolk County Council and East Suffolk Council and the UK Government

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty

The Suffolk coast and its visitor economy is defined by the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). This forms a very distinctive area of national importance and legally protected countryside, towns and villages in a largely rural environment. The AONB was designated in 1970 with the purpose of conserving and enhancing the habitats and biodiversity of the special heathlands, woodlands, estuaries and coast. The AONB stretches from Kessingland in the north to the Shotley Peninsula in the south, and is characterised by shingle beaches, heathland, forest, estuaries and iconic coastal towns. It is cherished for its relatively undeveloped, tranquil landscape and stunning natural and cultural history.

The Government has confirmed the AONB is to be increased in size in the south. That the new area will benefit from AONB guidance and advice, as well as the funding made available to designated landscapes so they can deliver their statutory purpose. The National Planning Policy Framework (NPPF) also affords them further protection.

According to the government, the expansion will bring “significant” benefits to the local area, with local businesses able to promote the area as an AONB and access grants, including for sustainable tourism.

In September 2019, the Government's *Landscape Review* concluded that the stature of National Parks and Areas of Outstanding Natural Beauty (AONBs) should be strengthened in the planning system – with AONBs given statutory consultee status. The review also recommended that, where appropriate, AONBs should be supported to work within local plans for their areas, prepared in conjunction with local authorities.

George Eustice, environment secretary, commented: “The Suffolk Coast and Heaths is a landscape rich in history and a source of inspiration to countless artists, writers and musicians, and these extensions are a worthy addition especially during this unprecedented time, when many of us are connecting with nature more than ever before. This milestone marks a significant step towards putting our ambitious 25 year environment plan to leave the environment in a better state than we found it into action.”

As the statutory agency for the natural environment, Natural England carried out “thorough technical analysis and extensive consultation,” before submitting the proposed extensions to the government for consideration.

Councillor David Wood, chairman of the Suffolk Coast & Heaths AONB Partnership, welcomed the expansion. “The AONB partnership, made up of public, private and third sector organisations, has had an aspiration to bring the benefits of the designation to a wider area for over 20 years.

“Locally we have always known that the area identified in the Order was outstanding, and with this news we can be confident that the natural beauty of the area will be conserved and enhanced for future generations.”

Impact of the proposed development on the AONB

The main development site would be mostly located in the AONB. The AONB Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. The Partnership includes the local authorities and Government agencies. In support of our objections we evidence the following AONB Partnership concerns about the proposed development:

- *Impact on the statutory purpose of the AONB, to conserve and enhance natural beauty*
- *The Partnership does not concur, in the strongest possible terms, with EDF Energy's apparent approach to the impacts on the AONB. where references are made to impacts in a 'limited area' of the AONB*
- *The Partnership acknowledges and welcomes that EDF Energy have stopped referring to the AONB designation as a 'local' designation and continues to seek acknowledgement from the developer that the designation is a national designation and has a statutory purpose*
- *The Partnership considers that EDF Energy have not demonstrated regard to the purposes of the AONB in the current application documents*

- *The Partnership does not agree with the developer's analysis of the cumulative impacts of the proposed development on the AONB*
- *The Partnership considers the introduction of new pylons into the nationally designated landscape unacceptable*
- *The Partnership considers that the impacts on the tourism industry in the AONB, worth £228M pa in 2019, have not been properly acknowledged or mitigated. The Partnership says that the AONB is the 'canvas' for the tourism industry to operate successfully and a 12 year construction phase has the potential to negatively impact that industry as demonstrated in the Suffolk Coast Destination Management Organisation/AONB study in 2019. The study showed that 29% of those polled would be a lot less or a little less likely to visit the Suffolk coast having been made aware of energy project proposals*
- *The Partnership considers that the construction phase impacts have been underrepresented.*
- *The Partnership considers the loss of part of the Site of Special Scientific Interest unacceptable, particularly as such designated sites are in the defined natural beauty characteristics and statutory purposes of the AONB and that the impacts of the current proposals for crossing the Site of Special Scientific Interest will have a significant impact on the defined characteristics of the AONB*
- *The Partnership considers that the proposed causeway will introduce an unacceptable level of development into the AONB and does not meet the statutory purposes of the AONB and will have significant negative impacts on the defined natural beauty and special qualities of the AONB*
- *The Partnership considers the proposed access road causes unacceptable negative impact on the defined natural beauty and special qualities of the AONB*
- *The Partnership considers the night-time impacts of the development have not been appropriately assessed against the AONB criteria. A baseline that includes impacts of light emanating from Sizewell A and Sizewell B should not be used as these are temporary structures and not representative to the background light of the AONB.*
- *The Partnership considers that the location of an outage car park in the AONB is inappropriate, unnecessary and does not meet the purposes of the AONB*
- *The Partnership has concerns relating to the loss of public access via public rights of way and open access areas. This loss of access will compromise the experience for those using such routes or areas and the experience of the AONB. There is a particularly high negative impact on the Suffolk Coast Path/proposed England Coast Path. The proposed mitigation is not satisfactory in meeting the statutory purposes of the AONB such as the defined natural beauty and special qualities of the AONB health and Wellbeing and Economy special qualities*
- *The Partnership considers that the design of the accommodation campus does not pay due regard to the statutory purposes of the AONB. Although located outside the AONB this element is within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty characteristics and statutory purposes of the AONB. This will include the Relative Tranquillity and Relative Wildness indicators*
- *The Partnership have concerns about the approach to coastal issues, it questions the developer's approach and considers it does not pay due regard to the statutory purposes of the AONB as communicated by the agreed Natural Beauty and Special Qualities document*
- *The Partnership recognise the wording in the National Policy Statement (EN-6), C.8.73, that states: 'Therefore, the Appraisal of Sustainability has found that there is the potential for some long lasting adverse direct and indirect effects on landscape character and visual impacts on the Suffolk Coast and Heaths AONB, with limited potential for mitigation'*

The National Trust

We also agree with the National Trust in its assessment of the impact of the proposed development on the landscape, the damage to ‘*the integrity and beauty of our site at Dunwich Heath and the wider landscape*’. It is our view that this would also result in long term damage to the local visitor economy.

The following paragraphs are extracts from the Trust’s Relevant Representations dated September 2020 at <https://nt.global.ssl.fastly.net/dunwich-heath-and-beach/documents/sizewell-c-relevant-representation-280920.pdf> ‘..... Parliament has created a statutory mechanism that enables our Trustees to declare that land “inalienable”. This means that the land is so important to the nation that it cannot be sold or mortgaged, rather it must remain in the care of the Trust, in perpetuity. Once declared inalienable this designation cannot be reversed. This is one way in which the Trust is able to deliver on its charitable purpose of preserving some of the nation’s most treasured places for everyone, forever.

The Trust owns 140 hectares of land at Dunwich Heath and Beach, which is located approximately 3 kilometres north of the proposed Sizewell C site. Dunwich Heath is a surviving fragment of lowland heath – one of the UK’s rarest habitats. It is subject to international and national designations. The majority of the land was declared inalienable in 1967 demonstrating the importance of the land and the Trust’s commitment to care for it permanently for the nation..... we believe that the current proposal risks unacceptably damaging the integrity and beauty of our site at Dunwich Heath and the wider landscape.

Suffolk County Council

Suffolk County Council also has substantial concerns about the landscape impact of the proposed development, most recently summarised in its Relevant Representations submitted to the ExA, at (<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/Suffolk-County-Council-Relevant-Representation-submitted-to-PINS.pdf>). In these matters we endorse the concerns and expectations of Suffolk County Council.

Landscape and Visual Effects:

80. Due to its prominent location in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the design of the power station and its impacts on the character and special qualities of the AONB have to be considered as of very high importance to the development. This has been identified in EN6.....

81. Significant adverse effects on visual amenity have been identified for several views from important local receptors. However, the applicant states that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during operation on these designations are therefore assessed as not significant. The Council disagrees with this conclusion, as the impact on the defined characteristics, in particular the coastal aspects, of the AONB designations within the locality of the main site are of notable significance, both at day- and night-time, and both during construction and operation.

82. The Council considers the applicant’s proposals for mitigating and offsetting these landscape impacts both within and beyond the Nationally Designated Landscape as inadequate,.....

85. The proposals include four additional tall pylons with overhead lines on the development site for the power export connection, which would have considerable additional detrimental impact on the Suffolk Coast and Heaths AONB, by adding significant clutter to the design. In previous rounds of consultation, the applicant proposed to underground the cabling on site, but now considers that such an option is not possible. However, the Council remains unconvinced that other, less intrusive, alternatives without pylons are not achievable. 86. If it is concluded by the Examining Authority that there are no technically possible alternatives to the use of pylons, a significant compensation package over the lifetime of the pylons would be important to compensate for their impact.....

87. Residual impact: The Council strongly disagrees with the applicant's assessment that there will be "insignificant" residual effects on most areas of ecology and impact on the special qualities of the AONB, including by impacting on biodiversity, visual impacts, tranquillity and through potential increased coastal erosion.....

90. Sizewell Link Road: The DCO documents propose that the Sizewell Link Road is to be retained permanently as a public highway. This inherently causes a greater permanent residual landscape and ecological impact than a temporary solution, as well as resulting in permanent loss of agricultural land. As there is no strategic transport case for permanent retention of the Sizewell Link Road.....the Council requests the road to be removed after the construction period.

East Suffolk Council

Similarly we endorse the representations of East Suffolk Council illustrated in its Relevant Representations, [East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R](#)

Significant adverse effects on visual amenity have been identified for views at:

- Westleton Walks and Dunwich Heath
- RSPB Minsmere
- Coastal strip between Dunwich, Minsmere Sluice and Beach View holiday park.
- Eastbridge and Leiston Abbey
- Sizewell Belts
- Views from NT Dunwich Heath Coastguard Cottages
- Views from offshore.
- the Suffolk Coast Path and Sandlings Walk.

It is claimed that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during operation on these designations are therefore assessed as not significant. Again, this seems to be a highly dubious and unsatisfactory conclusion and at best one of only passing academic interest as far as the AONB as a whole is concerned. The far more likely conclusion is that the impact on the coastal aspects of the designations are of notable significance.

Government Protection of Landscapes

The UK Government 25 Year Environment Plan 2018 ([A Green Future: Our 25 Year Plan to Improve the Environment](#)) and the UK Government Landscapes Review 2019 ([DEFRA - Landscapes Review - Final Report 2019](#)) have recognised the essential nature of environmental quality and the significance of the enhanced beauty, heritage and

engagement with the natural environment has to play in the objectives of these initiatives.

2018 UK Government 25 Year Environment Plan

The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first. The Plan has the following goals:

1. Clean air.
2. Clean and plentiful water.
3. Thriving plants and wildlife.
4. A reduced risk of harm from environmental hazards such as flooding and drought.
5. Using resources from nature more sustainably and efficiently.
6. Enhanced beauty, heritage and engagement with the natural environment.

2019 UK Government Landscapes Review

In 2019 the UK Government published its Landscapes Review, commissioned in response to the 25 year Environment Plan

The central proposal is to bring National Parks and AONBs together as 'national landscapes', a shared service. The Review proposes:

- Stronger purposes in law for our national landscapes
- AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes
- A new National Landscapes Service bringing our 44 national landscapes together to achieve more than the sum of their parts
- Reformed governance to inspire and secure ambition in our national landscapes and better reflect society
- A new financial model – more money, more secure, more enterprising.

Conclusions

We believe that the DCO should be rejected for the following reasons:

The applicant's approach to landscape and the protection of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty described in the DCO should be rejected for the following reasons:

- The proposed Sizewell C site is not suitable because the site and proposed development will not mitigate the visual impact on the AONB as envisaged by Government in EN-6.
- The proposed development would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'.
- The proposed development does not reflect the Government's view expressed in its 2018 25 Year Environment Plan and 2019 Landscapes

Review regarding the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment in the objectives of these initiatives.

- The proposed development would have a catastrophic long term impact on the landscape character of the Suffolk coast.
 - The proposed development would have an adverse impact on the integrity of the Suffolk Coast and Heaths AONB and many nationally and internationally important nature conservation areas.
 - The applicant's planned mitigations for landscape and ecological damage would be woefully inadequate and not compensate for the damage done during construction and beyond.
 - The proposed development does not seek to address the issues of the cumulative impacts of proposed energy infrastructure (Sizewell C, Sizewell B development, onshore wind farm and interconnector infrastructure).
-

4.6 Built Heritage

We believe that the proposed development would have significant and adverse impacts on the historic environment and setting of heritage assets. We object to the level of harm to the historic landscape character and setting of heritage assets resulting from the main development, together with the associated works which fall outside of the AONB including: the Accommodation Campus and the Sizewell Link Road.

The impacts on the setting of many heritage assets that have been identified in the Environmental Statement underestimates the level of harm that will occur. And the adverse impacts to the setting of heritage assets located along the wider access routes during the construction phase have not been adequately assessed.

The proposed access routes will change the rural setting of many heritage assets. This would arise from the construction of urbanising and highly engineered features such as the bunding at Leiston Abbey topped by security fencing. There would be associated noise and traffic movement, the erosion or loss of historic field patterns and the characteristics of a farmed landscape. In particular the settings of Leiston Abbey, Church of St Peter, Theberton, Theberton Hall, Glemham Hall, Farnham Hall, St Mary's Parish Church, Farnham, Cockfield Hall and Moat Farm, Theberton would be harmed. It would not be possible to provide adequate compensation for the anticipated damage to the historic natural and built environment.

The applicant's Sustainability Appraisal states that the setting of 90 heritage assets will be affected, yet the compensation is limited to two sites, Leiston Abbey and Upper Abbey Farm. The applicant has failed to assess the impact on all the Listed

Buildings and related structures along the full route that their traffic, particularly the heavy traffic, will take. They discuss such harm in a number of references but do not adequately assess it. Their historic environment assessment only focuses on those assets that have inter visibility with the main Development Site.

Many heritage sites located alongside the routes identified for road based construction traffic will be adversely affected for the duration of construction. This will be particularly true of a number of rural villages and settlements containing a wealth of designated and non-designated heritage assets and settlements.

The applicant has ignored the whole issue, apart from the relatively few with direct intervisibility. They have ignored the impact of noise and visual intrusion, and the gradual growth and increase this will generate. It cannot simply be assumed that there is 'no harm' to heritage assets from construction traffic. This real and cumulative impact has not been assessed, and should have been.

East Suffolk Council Relevant Representation ([East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R](#))

East Suffolk Council has made representations with regard to the proximity of Leiston Abbey, the most significant heritage asset in the locality, to the construction site, as follows, *The Scheduled Monument at Leiston Abbey First Site and Historic Landscape Character are the only heritage assets scoped in for assessment of potential impacts from the cumulative effects by SZC Co. The combined impacts of views of the main development site, proposed rail extension development and construction noise will have a significant impact on Leiston Abbey. There is not considered to be any adverse impact by SZC Co. on noise and visual effects arising from the construction of the rail extension route. We accept that the line is temporary so any disruption to views would be temporary but noise during construction could have an impact and we want to explore this further. Noise during operation of the rail extension is considered to be significant.*

Conclusions

We believe that the DCO should be rejected for the following reasons:

- The level of harm to the historic landscape character and setting of heritage assets resulting from the main development, together with the associated works which fall outside of the AONB including: the Accommodation Campus and the Sizewell Link Road.
- The Environmental Statement underestimates the level of harm that will occur; and the adverse impacts to the setting of heritage assets located along the wider access routes during the construction phase have not been adequately assessed.
- The proposed access routes will change the rural setting of many built heritage assets, introducing through the addition of urbanising and highly engineered features (such as the bunding at Leiston Abbey), with associated noise and traffic movement, resulting in the erosion or loss of historic field patterns and the characteristics of a farmed landscape. It will not be possible

to provide adequate compensation for the anticipated damage to the historic natural and built environment.

- A comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from the total number of affected Listed Buildings and their grades. This suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined. Overall, these figures suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.

4.7 Environment

We strongly object to the proposed development on environmental grounds; relating to environmental pollution (air quality, light, noise, dust and particulates) flood risk, water supply, terrestrial ecology, marine ecology, water framework directive and alignment of submission of Environmental Permits and the DCO.

We are supportive of the many other organisations that share these concerns including Stop Sizewell C, the Minsmere Levels Stakeholder Group, the Environment Agency, Natural England, Friends of the Earth, RSPB, Suffolk Wildlife Trust, and the two Councils.

Our objections are evidenced fully in the following extracts of representations made by the Minsmere Levels Stakeholder Group, the County Council, East Suffolk Council, The Environment Agency, Suffolk Wildlife Trust and RSPB

Minsmere Levels Stakeholder Group (MLSG)

MLSG is concerned that the Sizewell C Development Consent Order remains significantly incomplete and fails to provide answers to questions raised consistently during four rounds of consultation. These concerns remain as follows:

- Assessment of coastal geomorphological impacts over time, the role of the Sizewell-Dunwich Bank and coastal breach
- The development platform is well below the expected 30 hectares per nuclear reactor envisaged in EN-6 and has required unacceptable compromises on long term site safety

- The development platform requires a Hard Coastal Defence Feature (HCDF) to be very close to the beach and subject to early exposure by wave action
- There is no proposed design for the HCDF, yet the applicant has not evidenced confidence about its likely exposure
- The applicant does not evidence an understanding of the relationship between ground and surface water despite being a Scoping Report Opinion requirement
- The development platform requires redirection of the existing drainage in Sizewell Marsh, permanent loss of SSSI marsh, wet woodland, and fen meadow with un-evidenced expectations for simplistic water level controls as mitigation
- Dewatering of the development platform and changes to surface water runoff conditions will alter the natural hydrological relationship of the complex Sizewell Marsh and Minsmere Levels systems and is likely to impact water quality and have a negative impact on Minsmere Sluice
- Hydrological impacts of the proposed Causeway and Culvert crossing are not properly assessed
- The overall ecology of both Sizewell Marsh and Minsmere Levels are reliant on the annual cycle of ground and surface water changes; any disturbance will have direct impacts on bird, insect, reptile and mammal species
- Some habitat assessments are out of date and, as a result, impacts are likely to be missed or wrongly interpreted
- No clear plan exists to satisfy the water requirements of the development and impact assessments of water resource options are missing
- Proposed borrow pits and spoil heaps have great potential for introducing fugitive dust problems and pollution to groundwater and surface water runoff
- Using the proposed borrow pits as a destination for disposal of unusable materials from excavations, including acidic peat, pose a long-term threat for pollution of groundwater and localized settling over time
- Significant environmental impact assessments dismissed with undefined monitoring and mitigation

- Reports relied upon by the applicant in the development of the project are not available for assessment.

The following paragraphs will illustrate the many and varied environmental concerns expressed by a number of key organisations (Suffolk County Council, East Suffolk Council, Environment Agency, Suffolk Wildlife Trust and RSPB) and that they believe have not been addressed adequately by the applicant. The paragraphs are the latest available and reflect their September 2020 Relevant Representations submissions to ExA and indeed the Planning Inspectorate’s Section 88 Initial Assessment of Principal Issues .

We believe that, should the development be approved, these environmental issues would have a dramatic impact on the natural history of the area, the quality of life of local communities and an adverse impact on the local visitor economy. We are, therefore, fully supportive of the representations submitted by these organisations.

Suffolk County Council

Extracts from Relevant Representations

[Relevant Representation of Suffolk County Council in respect of the proposals for the Sizewell C Nuclear Power Station under sec](#)

126. Water Supply: The applicant proposes several high-level options to access the large amounts of potable and non-potable water it requires, yet it is clear that the majority of these options require medium to large scale interventions. Some of these may have significant environmental impacts, particularly in construction but also in operation, which have not been assessed within the submitted environmental statement.

127. Noise: The applicant has identified a range of adverse and significant adverse noise that will affect a wide range of sensitive receptors both around the development and across the wider district. It is still to be determined by the Council whether the assessments have not underestimated the impacts on those receptors that have been identified by the applicant as having low or negligible impacts.....A flexible and comprehensive scheme of ongoing assessment, monitoring and mitigation is likely to be key to minimising the noise impact.....

128. Air quality and dust:

129. The Council is concerned about non-traffic air quality impacts particularly related to dust and wind erosion from strong coastal winds arising from stockpiles and concrete batching. Due to the height of the proposed stockpiles, wind erosion is likely to be an issue. Further work is required by the applicant to verify its assumptions about stockpile erosion, to assess the impact on ecological receptors as well as impacts on the occupants of the Accommodation Campus and to review and enhance necessary mitigation and monitoring arrangements.

130. The proposed lime spreading may result in lime / dust translocation posing a risk activity for nearby ecological receptors; further site-specific mitigation based on measurement of local weather conditions is required.

131. In addition, emissions from Non Road Mobile Machinery (NRMM) have not been assessed beyond the haul roads on the main development or for the Associated Development sites which needs to be undertaken. The Council would expect the best currently available NRMM emissions controls standards, and use of electrically powered plant where possible, which are currently not being proposed by the applicant. Similarly, further assessment of air quality impacts from plant and the highest available standard of abatement for diesel generators is required to ensure that no adverse impacts arise due to operation of the generators.

133. Lighting: Concerns remain about the potentially significant impact of lighting particularly during construction, with regards to nuisance, ecology, tranquillity and dark skies; this needs to be addressed through lighting plans and assessments as well as monitoring.

East Suffolk Council

Extracts from Relevant Representations

[East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R](#)

Noise conclusion in summary

1.41 There are a number of significant adverse impacts from noise predicted to noise sensitive receptors from various elements of the proposals along with a level of uncertainty in the assessment that will need to be considered further before we can have confidence that noise has been adequately addressed.

1.42 A flexible and comprehensive scheme of ongoing assessment, monitoring and mitigation is likely to be essential.....

1.43 It is likely the DCO will contain a requirement that “exempts” the developer from action under Section 79 of the Environmental Protection Act 1990 (Statutory Nuisance) as is usual in these cases. However, due to the nature, size and duration of this development it is likely to cause complaint and there is an expectation that there will be cooperation with the Environmental Protection Team at East Suffolk Council in finding a resolution where these inevitable complaints are received and found to have merit. We will be seeking an assurance within the relevant documents to this effect and that a robust complaint management procedure is developed to support it.

1.45 it is likely that a project of this scale and magnitude will have noise impacts that will not be able to be reasonably addressed and those impacts will be present at varying degrees over the life of the project

Lighting

1.51 Lighting is an area that has the potential to significantly impact with regards to nuisance, ecology, tranquillity, and dark skies.....

1.52 In terms of construction lighting there will need to be a commitment for cooperation with us to investigate complaints of light nuisance and where a complaint is substantiated to address the issue.....

Air Quality

1.76 Construction phase impacts: Mitigation of dust during soil stripping - the mitigation measures within the draft CoCP and Dust Management Plan allow for monitoring associated with specific activities..... the CoCP should specify that dust deposition monitoring is required when soil stripping is undertaken within close proximity of sensitive receptors. Mitigation measures in the CoCP should also take account of the scale of the proposed development, and its coastal location.....

ESC is also concerned that the CoCP should include appropriate requirements regarding the emissions standards to be required on construction vehicles, and how these standards will be monitored/enforced. These commitments should be reflected in the assessment of air quality impacts due to construction traffic.

The Council requests that air quality monitoring is undertaken at agreed locations during the works in order to confirm the accuracy of modelled pollutant concentrations. This should start 1 year prior to any early construction works in order to obtain a baseline and continue for the duration of the construction period.

1.78 Experience at Hinkley Point C indicates that significant non-road mobile machinery (NRMM) is likely to be deployed during the construction programme. Regulation of NRMM is not covered under the Environmental Permitting process. ESC requests adoption of low emitting plant (electrically powered plant where possible, or plant complying with Stage V controls), and an assessment of the impact of NRMM on both human health and ecology, both alone and in combination with other sources (e.g. road traffic). Whilst an assessment of NOx impacts from haul road NRMM has been completed, further assessment should include a scenario with greatest number of NRMM working within close proximity of human health and ecological receptors, with appropriate and conservative assumptions about emission control standards which reflect the commitments made by SZC Co.

1.80the Council requests that the highest standard of emissions control through design and maintenance should be used to ensure that no adverse impacts arise due to operation of the diesel generators. Additionally, stack height and diameter, flue location and operating hours under test conditions should be specified to avoid any significant risk of adverse air quality impacts.

1.86 It is unclear whether assessment of formaldehyde and carbon monoxide impacts from the generators during commissioning and shutdown periods is included in the ES. These pollutants should be assessed further in the air quality assessment.

Environment Agency

Extracts from Relevant Representations at

[Environment Agency Relevant Representation on Sizewell C Development Consent Order](#) The Agency recommends that the Examining Authority considers the following issues as principal matters for the purpose of the examination.

Flood Risk – We have yet to agree that the supporting flood risk modelling is sufficient to consider the extent and consequences of flooding. The current Flood Risk Assessment (FRA) identifies increased flooding to properties without identifying appropriate mitigation and compensation measures. In terms of the objectives of an FRA, this is an unacceptable conclusion.

Water Supply - The water supply options described do not provide evidence to demonstrate that a suitable and ecologically sustainable source of water can be provided to the Sizewell C Project.

Terrestrial Ecology – The proposed use of culverts will have significant impacts to watercourses, designated habitats and protected species. Current assessments do not sufficiently identify likely impacts or provide appropriate mitigation and/or compensation measures.

Marine Ecology – We have outstanding concerns over methods being used to assess impacts to marine ecology and cannot yet agree to the appropriateness of proposed mitigation measures.

Water Framework Directive - We have concerns that the assessments have not identified all the potential impacts under the Water Framework Directive (WFD) or adequately assessed the potential

for deterioration in the status of WFD waterbodies affected by the development. If a deterioration in waterbody status cannot be ruled out an exemption will be required in accordance with Article 4.7 of the WFD and the applicant has not made a case to support this.

Alignment between submission of Environmental Permits and DCO – At this time we must highlight that we are currently unable to advise the Examining Authority of our position on the environmental permits required for operation, or provide representations on any matters covered by those permits as the permit applications were not submitted sufficiently in advance of the DCO application.

Suffolk Wildlife Trust

[The Sizewell C Project Development Consent Order Application Planning Inspectorate Reference: EN010012 Relevant Representation f](#)

Extracts from Relevant Representations

.....SWT were clear that we had a range of significant concerns over the plans for the project. These concerns largely stem from the fact that evidence was often limited, resulting in various assessments and conclusions not being robust. There are also a number of areas where we disagree with the interpretation of the data. The resulting mitigation and compensation will not offset the loss to biodiversity, or the impacts to protected sites and species. many of the issues have not been resolved

General Approach to European Protected Sites.

..... assessments of impact on the Special Protection Area (SPA) and Special Area of Conservation (SAC) rely on the delivery of monitoring and mitigation plans that are not actually contained within the DCO application. Consequently, it is impossible to determine potential impact in many cases. Furthermore, assessment of the synergistic effects of different impacts is weak, effectively meaning that the conclusions regarding adverse effects on the integrity of the sites has not been fully determined.

Coastal geomorphology

There is a lack of detail on coastal defence design, making it impossible to fully determine what any medium to long-term impacts might be. Therefore, we remain concerned what the long-term impacts of the Sizewell C frontage and beach landing facility might be on local coastal processes and how these in turn might impact the Minsmere frontage, its protected sites and the function of the Minsmere sluice as well as important County Wildlife Site shingle areas directly in front of the development.

Marsh Harrier Compensation Areas

Whilst there has been some effort to provide compensation for the loss of marsh harrier foraging over Sizewell Marshes Site of Special Scientific Interest (SSSI) and the southern half of Minsmere Levels, we remain concerned that areas of foraging provided will be inadequate to offset overall loss. We believe the extent of dry habitat provided will not offset the loss of valuable wetland, with lower quantities of prey items available. We also consider that disturbance levels within the compensation site, due to the proximity to noise and visual disturbance, has been underestimated.

Noise and visual disturbance

We are concerned that the impact of noise and light spill on breeding, migrant and non-breeding birds within Minsmere Levels (part of Minsmere-Walberswick Heaths and Marshes SSSI) has not been fully captured. There is a lack of detailed assessment on the impacts of night-time noise and from the construction of the water management zone bordering Minsmere, specifically. There remains little assessment of impacts of lighting on birds on the Minsmere levels. Detail is lacking in the lighting

strategy for the SSSI crossing and along Upper Abbey Farm bridleway and around Ash Wood and how this will avoid impacts on bats specifically.

Hydrological impacts on water quantity and water chemistry

We are concerned that the proposals for the cut off wall and Sizewell Drain alignment may significantly change the local water quantity and quality within Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SSSI. We believe there is potential for increased water flow from the development which may then create capacity issues at the Minsmere Sluice. This in turn could compromise water level management at RSPB Minsmere and its designated features and Sizewell Belts SSSI. It is not clear if there is any long-term plan for the Minsmere sluice, which the Sizewell C development will rely on for drainage in the future. The Minsmere sluice has a limited lifespan, well within the operational and decommissioning timeframes of the power station, and there is no clear plan of what to do once this sluice begins to fail. We remain concerned that there is long-term risk from contaminated leachate emanating from the borrow pits, potentially entering the Minsmere-Walberswick designated sites.

Specific hydrological impacts on Sizewell Marshes SSSI

Sizewell Marshes SSSI comprises of nationally important fen plant communities that are reliant on a defined water chemistry range and high water quality. Efforts to maintain the water levels can only be achieved, when groundwater will be displaced,.....we believe there remains a significant amount of uncertainty that the proposed mitigation will not be enough to prevent long-term damage to the SSSI.

Loss of Sizewell Marshes SSSI

We are concerned that the loss of SSSI via the causeway/culvert option instead of the bridge option, which will lead to a much larger loss, has not been adequately and clearly justified. We are concerned that the proposed habitat compensation sites will not be able to offset the loss of biodiversity, with the outcomes likely to be deficient in quality and quantity.

Aldhurst Farm habitat creation has been designed to compensate for the loss of reedbed habitat. Due to the high nutrients found in the surface water, it is likely to only support more generalist species, with a resulting overall loss of biodiversity.

Protected species

- Bats We have considerable concern that the overall impact on the nationally important bat population within the main development site has not been fully recognised. Specifically, the impacts of lighting and noise on bat foraging and the loss of connectivity across the landscape.....

– Natterjack toad We are concerned there may be significant impacts on natterjack toads as a result of loss of hibernation sites due to the current proposed footprint of the Water Management Zone.

Biodiversity Net Gain (BNG)

We dispute the conclusions of BNG. It is crucial that mitigation measures are secured separately and not counted as contributing towards BNG. We are also concerned that the biodiversity value of existing habitats has not been adequately captured.

Royal Society for the Protection of Birds [The Sizewell C Project Development Consent Order Application Planning Inspectorate Reference: EN010012 Relevant Representation f](#) Extracts from Relevant Representations

The RSPB raised concerns about several potential environmental impacts where critical underpinning evidence was missing or inadequate, resulting in the Applicant's assessments not being robust. The RSPB remains concerned that many of these issues have not been resolved in the material submitted

as part of the Application and therefore it is not possible to properly assess the Application and all its potential impacts on protected sites and species and biodiversity in the surrounding area. The RSPB's overarching concerns and the focus of our representations include the following:

- Detailed designs for key features including the coastal defences and crossing over the Sizewell Marshes Site of Special Scientific Interest (SSSI) are missing and we cannot therefore have confidence in the assessments of their potential impacts;*
- Conclusions of no adverse effect on integrity (AEOI) of European Protected sites are in many cases reliant on mitigation and monitoring plans which have not yet been produced, again leading to a lack of confidence in these conclusions;*
- The Shadow Habitats Regulation Assessment³ does not assess the total impacts of the project on the European Protected sites and their designation habitats and species. Although each type of potential impact is assessed (but please note the two bullet points below) this is done separately. This means conclusions regarding the total potential effects on the integrity of the sites is incomplete;*
- The RSPB has the same concerns around the lack of any "cumulative" assessments within the Environmental Statement;*
- The RSPB also has detailed concerns re the extent of the Environmental Impact Assessment (EIA) undertaken including insufficient data, lack of robust assessments, and insufficient consideration of efficacy of mitigation;*
- As partially mentioned above the RSPB has many concerns about the current lack of detail in the required mitigation, monitoring and management plans to be required by way of obligations or conditions imposed in respect of any consents granted;*
- As the landowner of Minsmere Nature Reserve, the RSPB remains concerned regarding potential impacts on the coherence of our land holding and its associated management arising from the development; and*
- The legal and policy requirements applicable to this Application and the Examination process.*

Conclusions

We believe that the DCO should be rejected for the following reasons:

- Effectiveness of Flood Risk Assessments for the main development site and all other associated development sites in considering the effects of coastal, fluvial, surface water, groundwater, sewers and other sources of flooding, taking into account climate change.
- The effect of SZC on coastal processes is unclear and its proposed rock armour defences are inadequate.
- The existing Minsmere Sluice was renewed in 2012 but its adequacy to cope with the changing environment, in particular during construction and operation of Sizewell C, has not been addressed by the DCO.
- The proposed construction and operation of the development would result in unacceptable levels of environmental pollution, including from light, noise, air quality, traffic and dust and particulates.
- Mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan and Code of Construction Practice need to be appropriately addressed.

- Mitigation of the environmental impact of the proposed borrow pits and subsequent landfill, and other areas of landfill has not been addressed adequately in the DCO.
- The proposed development has not addressed the potential adverse impacts on the ecological value of species and habitats in the marine and terrestrial environment.
- Implications for the integrity of designated sites, including: internationally designated sites, in particular European sites and European marine sites; nationally designated sites, such as SSSIs, the AONB and impact on local, regional and nationally significant natural history has not been adequately addressed.
- Appropriate Assessment, including Imperative Reasons of Overriding Public Importance, compensatory measures, selection of Natura 2000 sites, and alternatives for the Minsmere-Walberswick Special Protection Area (SPA) and Ramsar sites in respect of effects on breeding marsh harrier population during construction.
- Appropriate assessment in respect of coastal, freshwater and terrestrial habitats, ornithology, marine mammals and migratory fish.
- The proposed development does not fully address the need to provide an adequate drainage and water supply for the construction period and beyond.
- Abstraction of water will have its own impacts which will need to be managed to avoid risks to the environment and to protected species.
- A dewatering discharge strategy has not been provided. An unsustainable dewatering approach increases risks to the environment and potential harm to protected species.
- The risks to groundwater levels and surrounding habitats and ecology have not been adequately assessed and mitigated.
- Proposals increase flood risk due to the loss of flood storage from the main development site footprint and the proposed Sizewell Link Road.
- Inadequacy of the environmental measures incorporated into the design and mitigation proposals and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

4.8 Economic Impacts

The applicant's Economic Statement is intended to assess, amongst other things:

- the scale of the economic benefits that the Sizewell C project could bring 'to the labour market, regional productivity, and the supply chain';
- the potential for effects on labour supply and other industries present in the region (including tourism) and the measures that are intended to 'avoid negative effects'; and

- measures that are intended to be put in place to enhance the potential benefits and to complement existing regional objectives of various stakeholders.

The estimates for the scale of the economic benefits that applicant claims could be generated need to be examined by ExA and also the extent to which the Economic Statement has assessed the potential for negative impacts on other industries operating in the impact zone for the project.

In conclusion we believe that:

The applicant's Economic Statement is based on the experience so far at Hinkley Point C, a significantly larger economic area, and is both unproven and over-optimistic as a result. Furthermore, it only covers the early stage procurement which has been more easily satisfied by regional and local suppliers from an economic area 5 times the size of Suffolk and Norfolk. Later stages at Hinkley and Sizewell C will be dominated, at the expense of local businesses, by national and international suppliers who are almost certain to capture any Sizewell C contracts having gained the experience required to de-risk the project and benefit from the Hinkley experience.

NPS EN-6 requires that applicants for major nuclear energy projects take into account 'potential pressures on local and regional resources, demographic change and economic benefit'. However, the analysis set out in the assessment highlights that the applicant has failed to properly take into account, as required within legislation, the potential displacement impacts on other local businesses, both through competition for skills and labour, the potential deterrent effect on tourists and the loss of their expenditure throughout the tourism economy, and the potential negative effects of traffic congestion on the operational efficiency of local businesses. For all these reasons the overall conclusion is that EDF's Economic Statement is not compliant with NPS EN-6.

We argue that there are good reasons for doubting whether the benefits that are claimed could occur as stated in the Economic Statement.

4.9 Social Impacts

We note the applicant's conviction that the proposed development might bring benefits to the area. In reality, however, for many residents there is little prospect of direct benefits, whilst, critically, the cumulative negative impacts of the construction period on the local communities are woefully ignored in the DCO documents. The applicant has not yet conducted vital studies including Health and Community impacts. Noise pollution would be a real threat to health, causing heart disease, hypertension, hearing impairment, sleep disturbance, dementia. People living close to the site would be seriously affected.

It is difficult to imagine effective mitigation, and so the applicant must do much more to remove the causes of additional noise pollution in the first place, from traffic, its preferred siting of the proposed campus and borrow pits, and because of congestion and fly parking.

Across the community stress over the proposed development and its local impacts is a significant factor in people's health and wellbeing. The impacts on the local environment will mean changes to our way of life, our leisure activities and our wellbeing. Worker behaviour, even with a Code of Conduct, is a major concern. Local police support has been reduced, and the police station at Leiston is now closed.

The development of a Community Safety Management Plan and the Worker Code of Conduct will be especially important to local communities following the experience of the Sizewell B development. How will this be delivered and funded?

Overall we believe that the proposed development would leave a legacy of adverse social impacts on communities. Communities would be impacted by the influx of construction workers and there are likely to be effects on health on the receiving communities and on the incoming workforce; effects on accommodation; effects in relation to temporary on-site accommodation; effects on local businesses including tourism and the local supply chain and effects on the labour market.

Our concerns are also expressed in the representations of Suffolk County Council, East Suffolk Council and the Suffolk Safeguarding Partnership.

In order to evidence our case against the proposed development we have used information from the Relevant Representations of the two Councils and the relevant representations of the Suffolk Safeguarding Partnership are at [Report No](#)

Suffolk County Council

We agree there is a likelihood of detrimental impacts on community safety and community cohesion, as a result of the significant number of non-home based, predominantly male and young, workers within a rural community characterised by small towns. We disagree that potential effects on community cohesion after proposed built-in mitigation measures are likely to be "minor adverse (not significant)". We are concerned that community safety impacts will occur, particularly related to sex services, sexual exploitation of young people and drugs, alcohol misuse, anti-social behaviour, domestic violence, sexual violence and the corresponding additional risks to safeguarding of vulnerable people as well as wider community cohesion and integration issues.

East Suffolk Council

We agree that there are multiple communities close to the Main Development Site and Associated Development sites across East Suffolk and sharing and using the same highway network during the construction phase, that would be impacted by a development of this scale. And also those using recreational and tourism facilities close to the development site. And that during construction, the impacts will be widespread across East Suffolk, Mid Suffolk and Ipswich.

Community Safety is a key issue across the construction of the project and the applicant's analysis of anticipated crime is an artificial assessment and unacceptable. They have not taken into consideration the significant impact of the increased workforce across the affected East Suffolk towns of Leiston, Lowestoft, Saxmundham and Aldeburgh all of which, apart from Lowestoft, are relatively small communities in terms of increased tension, traffic congestion and related community safety issues, anti-social behaviour effects of a predominantly young male workforce and the potential increase in local crime as a result e.g. drug related offences, County Lines impact (in an area which currently has no live 'lines'), prostitution, physical assaults and abuse. Comparisons are made with Hinkley, but the demographic is different in East Suffolk and closer comparisons and learning should be gleaned from the Sizewell B construction and the actual effects of the significant NHB workforce based in East Suffolk. Sizewell C is also a much larger project and estimated to be in construction phase for 9 – 12 years, compared to Sizewell B which was an 8-year build project.

The applicant's assessment considers how measures have been designed to manage the Sizewell C Project's construction workers, their use of and access to public services, accommodation and community facilities, and how measures have been designed to promote integration, manage community safety and perceptions of safety to "reduce potential effects on community cohesion to minor adverse (not significant)". We agree that this would be extremely difficult to achieve, even with the help of the two Councils.

Conclusions

We believe that the DCO should be rejected for the following reasons:

- The proposed development, because of the intensive construction activities for a period of at least 10-12 years and thereafter during operation, would result in significant and long term damage to the Suffolk coast visitor economy.
- The Suffolk Coast Destination Management Organisation has found that tourism could lose up to £40 million a year, with the potential loss of up to 400 jobs.
- The Coronavirus Covid 19 Pandemic has placed the visitor economy under severe pressure throughout 2020 and into 2021. We believe that the proposed Sizewell C development would increase that pressure because of its environmental impact and the loss of tourism workers to the development workforce.
- The proposed development would place unacceptable pressure on local housing accommodation because of the need to house very large numbers of construction workers.

- The DCO does not provide adequate information to address local supply chain advantages and disadvantages.
- The DCO does not specifically address the essential funding of a Leiston economic development/regeneration programme.
- The DCO does not address the impact of the proposed development on the availability of tourism accommodation, particularly during the construction period.
- The DCO does not adequately address the impact on local jobs and skills, during construction and operation.
- The DCO does not address the issue of locally based employment. The sectoral work is inadequate and does not help to explain what jobs, at what skills/remuneration levels, and how long these jobs will be available to local people.
- The likely socio economic aspects of development are not adequately addressed by the applicant.
- Details of the proposed housing and tourism funds remain inadequate.
- Minimal consideration has been given to potential negative impacts on local businesses outside the nuclear supply chain whether through competition or disruption to investment.
- There is no account taken of the long term negative impact on the environment and therefore the future natural capital and tourism value of the site, i.e. no long term view emerging of the economic legacy of a comparable project other than jobs created in the nuclear sector.
- The applicant fails to explain how vulnerable children and adults in the local area would be affected by Sizewell C, in the short, medium and long term.
- The applicant has not taken into consideration the impact of the development on the rights of children in relation to health and mental wellbeing, access to safe open spaces and increased travel times to schools, colleges and recreational facilities.

4.10 Cumulative Impact

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast would be dramatic; and without intervention from Central Government would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. These include Sizewell C, Sizewell B, the SPR proposals for onshore wind farm infrastructure and the European and UK interconnector projects listed below. The adverse impacts to Suffolk life from Sizewell C and these other projects would far outweigh the benefits. Adverse impacts would arise from:

- Construction activity for many years

- Community impacts (noise, light, dust and particulates, health)
- Transport (road transport using an inadequate road network in particular)
- Landscape damage
- Harm to the built and natural heritage
- Flood risk
- Damage to the visitor economy
- Housing impacts
- Public service impacts (health, education, policing)

The Nautilus Interconnector is a proposed 1.4GW interconnector between Belgium and the UK promoted by a subsidiary of National Grid Electricity Transmission plc (NGET). It has a proposed landfall between Sizewell and Thorpeness.

The Eurolink Interconnector is a 1.4GW interconnector to the Netherlands. In National Grid's Interconnector Register on 8 January 2018 the project was identified with a connection site at "Leiston 400kV Substation". In December 2018 it was identified by NGET as having the same set of landfall and grid connection parameters at Nautilus.

Greater Gabbard Extension, now North Falls OFW. An agreement for lease has been signed with the Crown Estate. An application for development consent for this 504MW OFW is expected in 2023.

Galloper Extension. now Five Estuaries OFW. An agreement for lease has been signed with the Crown Estate. The proposal is for a 300MW OFW. It is understood that a Grid Connection Offer has been made in respect of the proposal, which is featured on National Grid's Transmission Entry Capacity (TEC) Register. The terms of that connection offer are not known.

4.11 Draft Development Consent Order

The DCO Covering Letter considers Consent Flexibility. In this regard defined elements of the Sizewell C Project would use a 'parameters approach' which identifies envelopes within which development would be undertaken. The applicant says that this approach allows for sufficient flexibility to accommodate design development that is anticipated following the grant of a DCO.

In adopting a parameters approach, the applicant suggests that it has carefully considered the Overarching National Policy Statement for Energy (NPS EN-1), the National Policy Statement for Nuclear Power Generation (NPS EN-6) and the Planning Inspectorate Advice Note Nine: Rochdale Envelope (July 2018).

In its Relevant Representation East Suffolk Council says that *there is an issue of uncertainty in the assessments which must be addressed. SZC Co. have accepted this uncertainty in their reports and it is to be expected in a project of this size and addressed under the principle of the Rochdale Envelope. Uncertainty is an issue where it might cause the assessment of impact to be underestimated through being informed by too little information or too much assumption. The Rochdale Envelope assessment approach is an acknowledged way of assessing a Proposed Development comprising EIA where uncertainty exists, and necessary flexibility is sought. However, case law has established that the need for flexibility should not be abused and further justification will be sought to this effect.*

There will also be a reciprocal expectation and requirement for flexibility on the part of SZC Co. in terms of further assessment and mitigation to take account of any underestimation in impact and the need to address it in the future.

We are extremely concerned that the proposed provisions of the Draft DCO, prepared by the applicant, need very careful scrutiny by the ExA, in particular because of its many effects on local communities most impacted by the form of the proposed development.

The multiple adverse effects of the proposal, the sensitivity of the location, and the inadequacy of the mitigation proposals are considered elsewhere. Should Development Consent be given they all point to the need to take a far more thorough approach to the design of all the infrastructure at this stage. The parameters need to be more tightly drawn. The flexibility to downsize the projects without further approval needs to be limited. The design of the entire project needs to be the subject of far better controls by the appropriate public sector bodies to ensure that the proposed designs are the least harmful achievable.

The Main Development Site parameter plans are far too flexible to secure a development that minimises impacts on communities and the environment, in particular the way that it covers, amongst other things, the

- SSSI crossing
- Beach landing facility
- Soft coastal defence feature
- Hard coastal defence feature
- National Grid pylon and associated infrastructure
- Accommodation Campus

Should the development proceed we agree with the Planning Inspectorate's Section 88 Initial Assessment of Principal Issues associated with the Draft DCO that need to give adequate consideration in order to protect communities, including:

- The Adequacy of the DCO Requirements, and associated provisions and documents, their status and enforceability to secure the proposed mitigation (primary, secondary and tertiary) and monitoring.

- Whether any additional Requirements are necessary.
 - Whether the flexibility that the scheme currently provides in terms of detailed design can be justified and represents a reasonable approach.
 - The proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents and appeals, including arbitration.
 - The need for and means of securing funding for any necessary monitoring and enforcement of the dDCO Requirements.
 - The explanatory memorandum.
-

5 Reasons why the DCO should be rejected

We believe that the DCO should be rejected for the following national, regional and local reasons.

National Policy

The proposed Sizewell C site is not suitable because the site and proposed development will not mitigate those impacts envisaged by Government in EN-6; in that it does not mitigate

- actions of coastal erosion
- effects on biodiversity including the SSSI that is partially included in the site boundary
- and the visual impact on the AONB.

Moreover the proposed development site

- is at risk from climate change and sea level rise and fluvial flooding
- is too small to accommodate a development of this scale
- would have enormous transport and socio economic impacts which the developer has shown no evidence of being in a position to mitigate.

The site is not the ‘potentially suitable site for new nuclear power stations before 2025’ identified by the UK Government in 2011 in EN-6.

Suffolk Coast and Heaths AONB

- The proposed Sizewell C site is not suitable because the proposed development will not mitigate the visual impact on the AONB as envisaged by the Government in EN-6.
- The proposed development would not meet the goals of the UK Government’s 25 year Environment Plan for ‘Enhanced beauty, heritage and engagement with the natural environment’.
- The proposed development does not reflect the Government’s view expressed in its 2018 25 Year Environment Plan and 2019 Landscapes Review regarding the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment in the objectives of these initiatives.

- The proposed development would have a catastrophic long term impact on the landscape character of the Suffolk coast.
- The proposed development would have an adverse impact on the integrity of the Suffolk Coast and Heaths AONB and many nationally and internationally important nature conservation areas.
- The applicant's planned mitigations for landscape and ecological damage would be woefully inadequate and not compensate for the damage done during construction and beyond.
- The proposed development does not seek to address the issues of the cumulative impacts of proposed energy infrastructure (Sizewell C, Sizewell B development, onshore wind farm and interconnector infrastructure).
- Although located outside the AONB the campus would be within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty and statutory purposes of the AONB.

Regional Objections

Cumulative Impact

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast would be dramatic; and would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. The adverse impacts to Suffolk life from Sizewell C and these other projects would far outweigh the benefits. The adverse impacts would be from:

- Construction activity for many years
- Community impacts (noise, light, dust and particulates, health)
- Transport (road transport using an inadequate road network in particular)
- Landscape damage
- Harm to the built and natural heritage
- Flood risk
- Damage to the visitor economy
- Housing impacts
- Public service impacts (health, education, policing)

Local Objections

Residential Amenity

- Theberton and Eastbridge and the B1122 communities would experience considerable loss of the residential amenity that they currently enjoy because of noise, dust and particulates, light pollution and loss of dark skies, traffic movements, the proximity of the proposed residential campus and the proposed borrow pits and spoil heaps and from the construction site activity generally.

- The presence of thousands of construction workers for at least a decade and in what is presently a peaceful rural environment would be very damaging to that environment and local communities
- It would not be possible for the applicant to have adequate regard to the protection of the existing residential and rural environment nor to provide adequate mitigation.

Accommodation Campus

- The proposed Accommodation Campus would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures.
- Alternative sites for the proposed Campus have been suggested but justifications for selecting the single Eastbridge Lane site are poorly evidenced.

Borrow Pits and Materials Management

Both proposals would have a significant adverse impact on local communities and they would not satisfy policies MP3 and GP4 of the Suffolk Minerals & Waste Local Plan 2020.

In terms of Policy GP4 the proposed borrow pits and spoil heap do not adequately assess or satisfactorily mitigate (and address where applicable any potentially significant adverse impacts including cumulative impacts) the following:

- pluvial, fluvial, and groundwater flood risk;
- vehicle movements, access and the wider highways network;
- landscape character, visual impact, setting, and designated landscapes including the Suffolk Coast and Heaths AONB;
- biodiversity including important hedgerows and trees;
- geodiversity;
- historic environment, archaeology, heritage assets and their setting;
- public rights of way;
- neighbouring land-use, in particular the nearby residential communities;
- soil resources including the best and most versatile agricultural land;
- noise and vibration;
- air quality including dust and odour, in particular impacting nearby residential communities;
- light pollution in particular impacting nearby residential communities, the 'dark skies' enjoyed by local communities and an important component of the visitor economy;
- the local water environment;
- land instability;
- the differential settlement of quarry backfilling;

- mud and aggregates on the road;
- litter, vermin and birds.

The proposals do not meet or exceed the appropriate planning policy or guidance. The proposals do not demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance (local communities), that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.

Transport

- A road dominated transport plan is not sustainable; it would have a substantial carbon footprint and contribute to climate change.
- Road based transport would have an enormous and adverse impact on local communities and result in long term damage to the East Suffolk visitor economy.
- The proposed Sizewell Link Road would follow a route parallel to the B1122; it would sever and isolate communities, damage the rural footpath system and disrupt and divide farmland.
- The proposed Sizewell Link Road would have no legacy value for local communities and the completed development. It is unlikely that it would be adopted by the Highway Authority.
- Alternative routes exist and have been dismissed as options by EDF with no adequate reasons given. The previously explored new road route south of Saxmundham, or another following a similar route, would have genuine legacy value.
- The applicant agrees that the B1122 is inadequate to cope with anticipated traffic volumes; so a time delay between the start of the proposed development and a subsequent start of construction of the Relief Road becomes even more significant to local communities, including a dramatic increase in disturbance to local communities during its construction at the same time as construction traffic use of the B1122.
- There would be irreversible long term damage to existing tourist footpath and cycle routes and, therefore, to the visitor economy.
- Delays in the construction of the Sizewell Link Road as a result of challenges to the CPO would mean longer periods of noise and disturbance to communities alongside the B1122.
- There is an urgent need for a pragmatic and comprehensive travel plan in this locality to resolve transport issues associated with the cumulative impact of several proposed energy infrastructure developments, including Sizewell B, Sizewell C, SPR onshore development at Friston and interconnector infrastructure.

Landscape

- The proposed Sizewell C site is not suitable because the site and proposed development will not mitigate the visual impact on the AONB as envisaged by Government in EN-6.
- The proposed development would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'.
- The proposed development does not reflect the Government's view expressed in its 2018 25 Year Environment Plan and 2019 Landscapes Review regarding the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment in the objectives of these initiatives.
- The proposed development would have a catastrophic long term impact on the landscape character of the Suffolk coast.
- The proposed development would have an adverse impact on the integrity of the Suffolk Coast and Heaths AONB and many nationally and internationally important nature conservation areas.
- The applicant's planned mitigations for landscape and ecological damage would be woefully inadequate and not compensate for the damage done during construction and beyond.
- The proposed development does not seek to address the issues of the cumulative impacts of proposed energy infrastructure (Sizewell C, Sizewell B development, onshore wind farm and interconnector infrastructure).

Built Heritage

- The level of harm to the historic landscape character and setting of heritage assets resulting from the main development, together with the associated works which fall outside of the AONB including: the Accommodation Campus and the Sizewell Link Road.
- The Environmental Statement underestimates the level of harm that will occur; and the adverse impacts to the setting of heritage assets located along the wider access routes during the construction phase have not been adequately assessed.
- The proposed access routes will change the rural setting of many built heritage assets, introducing through the addition of urbanising and highly engineered features (such as the bunding at Leiston Abbey), with associated noise and traffic movement, resulting in the erosion or loss of historic field patterns and the characteristics of a farmed landscape. It will not be possible to provide adequate compensation for the anticipated damage to the historic natural and built environment.
- The comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey

complex are excluded from the total number of affected Listed Buildings and their grades. This suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined. Overall, these figures suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.

Environment

- Effectiveness of Flood Risk Assessments for the main development site and all other associated development sites in considering the effects of coastal, fluvial, surface water, groundwater, sewers and other sources of flooding, taking into account climate change.
- The effect of SZC on coastal processes is unclear and its proposed rock armour defences are inadequate.
- The existing Minsmere Sluice was renewed in 2012 but its adequacy to cope with the changing environment, in particular during construction and operation of Sizewell C, has not been addressed by the DCO.
- The proposed construction and operation of the development would result in unacceptable levels of environmental pollution, including from light, noise, air quality, traffic and dust and particulates.
- Mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan and Code of Construction Practice need to be appropriately addressed.
- Mitigation of the environmental impact of the proposed borrow pits and subsequent landfill, and other areas of landfill has not been addressed adequately in the DCO.
- The proposed development has not addressed the potential adverse impacts on the ecological value of species and habitats in the marine and terrestrial environment.
- Implications for the integrity of designated sites, including: internationally designated sites, in particular European sites and European marine sites; nationally designated sites, such as SSSIs, the AONB and impact on local, regional and nationally significant natural history has not been adequately addressed.
- Appropriate Assessment, including Imperative Reasons of Overriding Public Importance, compensatory measures, selection of Natura 2000 sites, and alternatives for the Minsmere-Walberswick Special Protection Area (SPA) and Ramsar sites in respect of effects on breeding marsh harrier population during construction.
- Appropriate assessment in respect of coastal, freshwater and terrestrial habitats, ornithology, marine mammals and migratory fish.

- The proposed development does not fully address the need to provide an adequate drainage and water supply for the construction period and beyond.
- Abstraction of water will have its own impacts which will need to be managed to avoid risks to the environment and to protected species.
- A dewatering discharge strategy has not been provided. An unsustainable dewatering approach increases risks to the environment and potential harm to protected species.
- The risks to groundwater levels and surrounding habitats and ecology have not been adequately assessed and mitigated.
- Proposals increase flood risk due to the loss of flood storage from the main development site footprint and the proposed Sizewell Link Road.
- Inadequacy of the environmental measures incorporated into the design and mitigation proposals and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

Social Impacts

- The proposed development, because of the intensive construction activities for a period of at least 10-12 years and thereafter during operation, would result in significant and long term damage to the Suffolk coast visitor economy.
- The Suffolk Coast Destination Management Organisation has found that tourism could lose up to £40 million a year, with the potential loss of up to 400 jobs.
- The Coronavirus Covid 19 Pandemic has placed the visitor economy under severe pressure throughout 2020 and into 2021. We believe that the proposed Sizewell C development would increase that pressure because of its environmental impact and the loss of tourism workers to the development workforce.
- The proposed development would place unacceptable pressure on local housing accommodation because of the need to house very large numbers of construction workers.
- The DCO does not provide adequate information to address local supply chain advantages and disadvantages.
- The DCO does not specifically address the essential funding of a Leiston economic development/regeneration programme.
- The DCO does not address the impact of the proposed development on the availability of tourism accommodation, particularly during the construction period.
- The DCO does not adequately address the impact on local jobs and skills, during construction and operation.
- The DCO does not address the issue of locally based employment. The sectoral work is inadequate and does not help to explain what jobs, at what skills/remuneration levels, and how long these jobs will be available to local people.

- The likely socio economic aspects of development are not adequately addressed by the applicant.
- Details of the proposed housing and tourism funds remain inadequate.
- Minimal consideration has been given to potential negative impacts on local businesses outside the nuclear supply chain whether through competition or disruption to investment.
- There is no account taken of the long term negative impact on the environment and therefore the future natural capital and tourism value of the site, i.e. no long term view emerging of the economic legacy of a comparable project other than jobs created in the nuclear sector.
- The applicant fails to explain how vulnerable children and adults in the local area would be affected by Sizewell C, in the short, medium and long term.
- The applicant has not taken into consideration the impact of the development on the rights of children in relation to health and mental wellbeing, access to safe open spaces and increased travel times to schools, colleges and recreational facilities.

Draft Development Consent Order

Should Development Consent be given there is a need to take a far more thorough approach to the design of all the infrastructure at this stage. The parameters need to be more tightly drawn. The flexibility to downsize the projects without further approval needs to be limited. The design of the entire project needs to be the subject of far better controls by the appropriate public sector bodies to ensure that the proposed designs are the least harmful achievable.

The Main Development Site parameter plans are far too flexible to secure a development that minimises impacts on communities and the environment, in particular the way that it covers, amongst other things, the

- SSSI crossing
- Beach landing facility
- Soft coastal defence feature
- Hard coastal defence feature
- National Grid pylon and associated infrastructure
- Accommodation Campus

6 Recommended planning conditions, planning legal agreements and other safeguards should Development Consent be given

Should the DCO be approved there will be a need for legally-binding commitments made by EDF and others during and after the DCO process (e.g. Planning Performance Agreement, Section 106 Agreement, Highways legal agreements and Planning conditions) able to be appropriately enforced by public bodies, including the

Local Planning Authority. **This view does not in any way constitute support or an acceptance of any part of the applicant's plans.**

In terms of the development directly impacting Eastbridge and its adjacent areas these should include:

- appropriate mitigations of the impact of the proposed development on the hydrology of the Sizewell Marsh, Minsmere Levels and Minsmere River valley
- monitoring and contingency arrangements related to the impact of the development on natural coastal processes
- monitoring and contingency arrangements related to the pollution associated with the use of back-fill materials deposited in the proposed borrow pits
- borrow pit restoration to the land use specified in the Development Consent
- mitigation of any adverse impact of the development on the future effective operation of the Minsmere sluice and to maintain the water course so that it responds to flood risks (e.g. dredging of the river from Middleton and appropriate adaptations to the management of outflow at the Minsmere Sluice)
- survey and protection of existing landscape features, including ponds, hedges and trees (including veteran trees) for the entire development site and for the duration of the development
- the establishment of appropriate pollution monitoring and contingency arrangements for the entire development site for the duration of the development (e.g. as a result of noise, light, dust, particulates, surface and ground water and leachate)
- waste water treated to appropriate regulations before discharge.
- appropriate management of the establishment and the operation of borrow pits and spoil heaps

For and associated with the Accommodation Campus site;

- the proposed Campus site must not extend west of Eastbridge Lane and the ExA should ensure by legal agreement that no flexibility exists to increase the size and scale of the Campus
- no part of the Campus shall exceed four storeys in height
- that the site is fully restored to improved pasture as illustrated in the Stage 3 Pre-Application Consultation so it cannot be developed in the longer term
- all Campus lighting is designed to avoid light spillage in the direction of neighbouring residential development, including Eastbridge
- the proposed decked car park on the north side of the Campus to be designed to exclude light spillage from motor vehicles towards Eastbridge and other nearby residential properties
- noise from the Campus during occupation is limited so that no disturbance occurs to nearby communities and households, including Eastbridge
- that all existing trees and hedgerows are adequately protected from damage during construction of the Campus and thereafter

- that the Campus is landscaped adequately to minimise the risk of visual intrusion of buildings when viewed from Eastbridge and nearby residential property
- that the applicant and the management organisation responsible for the proposed Campus make appropriate limitations on the ability of residents to exit the site on foot, cycle or by motor vehicle other than by the proposed main site entrance at the B1122
- that the proposed Campus is served by appropriate and adequate waste management, sewerage management, water supply and water management facilities, energy supply and broadband facilities and that these services that have zero adverse impact on local communities and households
- that during construction of the Campus appropriate measures are taken to minimise the impact of noise, dust and particulates, vehicle emissions and light pollution on nearby residential development, including Eastbridge
- that construction activity be limited to the hours of 7am to 6pm
- that neighbouring highways be cleaned of debris arising from the Campus construction site daily
- that construction vehicles leaving the Campus construction site should be washed on site before joining the highway
- that the lighting of fires to dispose of Campus construction site building debris shall not be permitted
- that Campus site construction workers and contractors shall not be permitted to travel to the site via Eastbridge nor to park outside the Campus site boundary, including in Eastbridge and Theberton and surrounding rural roads, on the B1122 or the road connecting the B1122 and Eastbridge)
- that in the event of road incidents during construction and operation of the proposed Campus construction workers, contractors and residents should not be permitted to travel to the Campus construction site via Eastbridge and Theberton (other than on designated routes) and associated minor roads
- that Campus residents shall not be permitted to travel to the Campus through Eastbridge nor to park outside the Campus site boundary, including in Eastbridge and Theberton and surrounding rural roads, on the B1122 or the road connecting the B1122 and Eastbridge.)

Sizewell Link Road (SLR)

- that the proposed SLR shall be removed following the period of construction of Sizewell C. Arrangements for funding of this work to be established by way of an appropriate legal agreement and/or endowment before commencement of the development.
- that land taken by the proposed SLR shall be restored to its original condition and use and to a standard agreed by local communities and landowners as well as the Local Planning Authority.

- the design of the proposed SLR should reflect recognised highway standards related to safety, including for use by bicycles, pedestrians, people with mobility difficulties and equestrians.
- the applicant should fully fund the maintenance of the proposed SLR for the period of its use.
- the applicant shall give due consideration to the impacts of community severance as a result of the construction of the proposed Sizewell Link Road and design the road accordingly (e.g. SLR to bridge over or under minor roads (e.g. Pretty Road) to maintain local permeability and accessibility)

Planning Act 2008 – Section 88 Initial Assessment of Principal Issues

The following list of recommended community safeguards is mostly based on the Initial Assessment of the Principal Issues prepared under section 88(1) of the Planning Act 2008 (PA2008). The ExA says that it *will have regard to all important and relevant matters during the Examination and when it writes its Recommendation Report to the Secretary of State for Business, Energy & Industrial Strategy after the Examination has concluded.* We believe that these matters cover many of the issues that need to be addressed as planning conditions and legal agreements between appropriate parties should Development Consent be given

Traffic and Transport – to include:

Suitability of the Transport Strategy, including consideration of movement of people and freight by mode of travel.

- Suitability of the Transport Assessment and modelling approaches.
- Effects on local road networks and roads, including access, congestion, road safety and disruption.
- Effects on emergency services.
- Effects on the Strategic Road Network (SRN).
- Effects on PRoW and Non-Motorised User (NMU) routes
- Effectiveness of mitigation and control measures, monitoring and enforcement.
- Consideration of effects of other developments.

Air Quality

The Local Planning Authority and Public Protection departments need to be in a position to ensure that the applicant addresses local Air Quality through

- its air Quality impact baseline assessment methodology;
- dealing with effects on air quality arising from dust and particulates during the construction phase including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- dealing with effects on air quality arising from dust and particulates during the operational phase including through changes in vehicular activity and changes in distances between sources of emissions and air quality sensitive receptors;

- mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP);
- dealing with effects on air quality arising from dust and particulates during the decommissioning of the Proposed Development including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- the adequacy of the environmental measures incorporated into the design and mitigation proposal and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

Draft Development Consent Order – to include:

- The s.106 agreement and other obligations and agreements
- Regulatory approvals and environmental permits.
- Adequacy of the dDCO Requirements, and associated provisions and documents, their status and enforceability to secure the proposed mitigation (primary, secondary and tertiary) and monitoring.
- Whether any additional Requirements are necessary.
- Whether the flexibility that the scheme currently provides in terms of detailed design can be justified and represents a reasonable approach.
- The proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents and appeals, including arbitration.
- The need for and means of securing funding for any necessary monitoring and enforcement of the dDCO Requirements.
- The explanatory memorandum.

Flood risk, ground water, surface water – to include:

- Effectiveness of Flood Risk Assessments (FRA) for the main development site and all other associated development sites in considering the effects of coastal, fluvial, surface water, groundwater, sewers and other sources of flooding, taking into account climate change.
- Effects on groundwater and surface water, including Source Protection Zones, water dependent resources and receptors from the construction and operational phases of the proposed development.
- Effectiveness of mitigation measures and monitoring.
- Compliance with the Water Framework Directive.

Health and wellbeing – to include:

- Potential adverse effects on human health and the living conditions of local residents during construction and operation including those arising from air quality, noise and vibration, visual impact and pollution.

- The overall impact upon human health and the living conditions of local residents taking into account the cumulative effects of the proposed development itself and with other development.
- Whether there is a need for on-going monitoring of any potential adverse health effects?

Historic environment (terrestrial and marine) – to include:

- Effects on the terrestrial heritage assets and their visual and functional settings, and on buried and marine archaeology.
- Future archaeological investigation, monitoring and supervision.

Landscape impact, visual effects and design – to include:

- Design of the proposal.
- Impact on landscape and visual amenity, including the settings of protected landscapes.
- The effects of temporary and permanent lighting on the landscape and visual amenity.
- Effects on amenity and views from the PRow network.
- Effectiveness of mitigation.
- Cumulative effects.

Noise and vibration – to include:

- Noise and vibration baseline noise survey methodologies.
- Noise and vibration from traffic, rail and other operations generated through construction, maintenance and decommissioning.
- Construction, operational and decommissioning noise and vibration effects on residents, businesses and wildlife.
- Maximum noise levels and exposures and working hours. Establishing the maxima, and monitoring and enforcement throughout the development.
- Proposed monitoring and mitigation measures, including noise and vibration reduction measures, working hours, techniques and practices and the means whereby this would be secured by the dDCO and CoCP.

Policy and need – to include:

- The need for the proposed development including in terms of national considerations and the local economy.
- In particular, the current role and status of NPSs EN-1 and EN-6 including whether there has been any relevant change of circumstances that would call into question whether the assessment of need for sites set out in the NPSs remains up to date?
- Whether site circumstances have changed at Sizewell to the extent that the NPS policies for Sizewell C can no longer be regarded as being up to date including changes to the nominated site area?
- Radiological considerations – to include:

- Adequacy of provision of facilities for the safe storage of Intermediate Level Waste (ILW) and spent fuel rods. Whether contingency is adequate?
- Longer term plans for this storage and how this would be facilitated and maintained.

Socio-economic – to include:

- Monitoring and mitigation of community impacts
- Baseline assessment methodology and socio-economic evaluation.
- Effects of incoming workers on the receiving communities (including law and order considerations, schooling and impact on community facilities).
- Effects on health on the receiving communities and on the incoming workforce.
- Effects on accommodation.
- Effects in relation to temporary on-site accommodation.
- Effects on local businesses including tourism and the local supply chain.
- Effects on the labour market.

Waste (conventional) and material resource – to include:

- Effectiveness of Conventional Waste Management Strategy.
- Effects on the supply of potable and non-potable water during construction.

Robert, Helen and Colin Flindall

2nd June 2021