

Joan Girling Ref 20026021
Written Representation on
DCO For Sizewell C
Infrastructure Planning committee
13-5-2021

1. Preamble

I recognise that the Planning Inspectorate and the Examining Authorities must have regard to National Planning Policy EN1 and EN6 on Energy when considering the aspects of the DCO for Sizewell C and when determining their recommendation to the Secretary of State thus allowing the SoS to make a final decision on the application for SZC.

However the Secretary of State has a duty to review NPS EN1 to EN6 at his/her discretion when material changes take place or when there is a change in circumstances. Therefore I wish to make the following points:- Since 2017 NGOs have been pressing the Government for an Energy review to reflect changing circumstances for the production of electricity. A consultation on EN6 NPS was undertaken by BEIS in 2018 to which many responded, including Local Authorities, Statutory Bodies and NGOs.

A letter was received from BEIS to say a second consultation would take place in 2018, this has not happened.

The fact that the National Policy Documents written in 2008/11 are out of date is fully understood by Government. It is stated in the Government's White Paper on Energy that a review of the NPS EN1-6 will be undertaken in late 2021.

Therefore SZC DCO is being examined and recommendations made using Policies which do not take into account the many diverse and material changes of circumstances which have taken place since 2008/11.

Such as increased climate change, rapidly rising sea levels, quantity and quality of off shore wind turbines, decreased cost of all alternative technologies including solar, green hydrogen, ground and air source heat source pumps, etc. Community energy schemes with innovative technologies, and continuing research and development in energy production.

Many of the above technologies have changed the "need" case for 8 Nuclear Power stations over 1 GW by 2025 as stated in EN1.

As yet there has been no public study on the need case, or consideration of the best affordable and sustainable means of producing electricity since 2008.

In attempting to counter the fact that the working documents NPS EN1 and EN6 contain matters which cannot be achieved; such as “deployment by 2025” (a working power plant) and to ensure the SZC DCO process can continue, the following wording is contained in a Ministerial statement made in 2017.

*“in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under Section 105(2)(c) of the Act, to have regard to the content of EN1 and EN6, unless they have been suspended or revoked. In respect of matters **where there is no relevant change of circumstances** it is likely that significant weight would be given to the policy in EN1 and EN6”*

The Ministerial words are open to interpretation. I submit there have been many relevant changes of circumstances, as stated above and conclude some wording in the National Policy Documents for Energy is no longer applicable. I consider it difficult for the Planning Inspectorate to recommend to the Secretary of State consent or refusal of the DCO for Sizewell C in these circumstances.

It is totally reprehensible that a massive Infrastructure Project such as Sizewell C will be determined on a set of documents which are not related to present day facts and situations. They are not in my opinion fit for the purpose of considering the case for SZC.

I recognise that this situation is of the Governments making not that of the Planning Inspectorate.

NPS EN6 states “Sizewell is a potentially suitable site for a nuclear power station” and the applicant in its deliberations sets out to prove that the site is quite suitable.

I intend to raise issues which I consider prove that the site is not suitable and wish to record my strong objections to EDF/ SZC Co application for Sizewell C DCO on the following grounds.

My comments on the applicants DCO are as follows:-

2 Policy and Need

The policies contained in the NPS suite of Documents EN1 to EN6 are not related to the present day. Deciding such a massive infrastructure project as SZC in rural East Suffolk without the recognition of all the changing and evolving circumstances or the consideration of the best practical and affordable means of producing electricity for the Country’s need is beyond comprehension.

The need for 3.2 Gigawatts of nuclear generating capacity is not proven. No electricity will be generated from SZC if consented until 2035 therefore it will not be contributing to CO2 reduction. The construction will exacerbate a rise in CO2 not reduce it. It will be several years after

construction before there is any CO2 pay back. This is far too late to combat the urgent need for CO2 reduction.

More sustainable clean green facilities can be achieved and deployed far quicker at a greatly reduced cost and less environmentally damaging.

3 EN6 Sizewell C Site

Due to its remoteness and position in the AONB on the Suffolk Heritage Coast with its many surrounding designations including the SSSI, the site is constrained and at approx 32.0 hectares it is small when compared to 52.4ha of Hinkley PC.

At present it has no vehicular access apart from a route past SZA and B. The suggested landtake as presented in the Sizewell C DCO bears little resemblance to, and far exceeds, that which is identified in the Planning Document EN6 for Sizewell.

I do not have the means to calculate the actual total.

To put this into context :-

- a) Land for Nuclear Site Licence is Set by ONR
- b) Land surrounding the Licensed site ie the perimeter of the area of land needed to build SZC and some of its extraneous buildings such as turbine halls wet fuel store, dry fuel store etc.
- c) Car Parks next to the site.
- d) Lay up area and concrete batching plant.
- e) Access Road.
- f) Rail line.
- g) Training Centre.
- h) Visitor Centre.
- i) Use of Beach and dunes area to access permanent Jetties. The route is combined with further land take for the lay up area.
- j) Accommodation Blocks.
- k) Borrow pits.
- l) Stock piling soil and peat.
- m) Haul roads for excavations and infill.
- n) Off site car and lorry Park and Ride sites.
- o) Further land for Link Road and Farnham By pass.

Due to lack of information in the Applicants DCO and the maps which contain no grid references, and working from a home computer I have been unable to ascertain the exact extent of the land take.

4 Proposed Sizewell C Site

From day one of the first consultation there have been requests for maps with Ordnance survey grid references for all proposed work at the actual

site and for all further ancillary development which accompany the SZC application.

For the purpose of the SZC Site and to illustrate my point the maps as supplied as Plans for Approval May 2020

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-001626-SZC_Bk2_2.5_Construction_Parameter_Plan_For_Approval.pdf

These contain no grid lines and the majority of the definitive site lines are referenced as approximate. The scale and size of this development must be capable of defining the parameters of the development with absolute accuracy.

In many cases there are no identification points on maps. Many people have asked for this to be corrected from Consultations 1 to 4 but at DCO there appears to be no change.

This has made a full understanding of size and space of this sensitive site extremely difficult. Especially as interested NGOs are working from home computers on A4 maps and are not able to see larger maps due to Covid19 restrictions. The maps are copyrighted and local printers are unable to provide larger copies.

The SZC site is constrained at all perimeters. North by RSPB, south by Sizewell B, east by the North Sea, and west/ north by the SSSI.

The site should not be compared to Hinkley Point C. The two sites are different on size, geology and accessibility,

The size of the ONR licensed nuclear site must be known in due course.

The actual line of the outer perimeter boundary of the site is not known.

As all the surrounding land is owned by the applicant it would appear that they have the ability to use development creep, pushing any perimeter boundary to more than the absolute limit, particularly over the SSSI and toward the coast.

The applicant has repeatedly increased the land take from the SSSI in the west and north and has ignored the planning Blue and Green line to the East in the coastal strip as agreed for Sizewell A and B.

REF 3 Blue line SZB Planning Conditions Green line Limit of Operational Land. (Attached separately)

When compared with the 52.4 hectares for Hinkley Point C it will, in planning terms, lead to a cramped unsightly predominantly industrial development, which will be visible from many points in the lowlying long distance views of the Heritage coast and its hinterlands. If built, the two reactor buildings will be set on a building planning platform height of 7.2 metres AOD. The bulk of the two reactor buildings with their uniform concrete appearance and vent stacks to an unknown height, are severely out of keeping with SZB. The additional pylons will also dominate the skyline and detract from the sea and landscape both day and night.

During the build programme it is difficult to understand how there will be sufficient room to manoeuvre all the equipment, materials and heavy plant required. The cramped site seriously adds to our concern about the possible increasing use of the surrounding land.

I am of the opinion that mitigation for any of the above is impossible. No landscaping will ever be sufficient to conceal the blot on the AONB landscape. There can be no compensation for the loss of unique natural beauty when the dominance of SZC will be visible over so many miles. If the ExA are deemed to recommend consent to the SoS for SZC I would expect the applicant to have a definitive limit for the total SZC development perimeter boundary.

If this is not forthcoming from the applicant it is imperative that it is a Condition of consent.

5 Geology of SZC Site

The geology of the site is questionable with very few major facts being available from the applicant, therefore many important quantities and type of materials are not known and have not been properly assessed. SZC proposed site has an overlay of materials which were excavated and spread over the site during the construction of SZB.

The underlying geology of the site is known from previous studies to contain vast quantities of underlying peat, sand and clay and two aquifers *Royal Haskoning Scoping Report 2008*

It is intended to build a cut off perimeter wall to a depth of 48 metres below AOD to exclude water from the site.

During excavation the entire site will need to be continually dewatered to a depth of -32 metres AOD and the acidic water continually pumped into the North Sea.

This is totally unacceptable; it deprives the underlying movement of an intricate water system which is paramount to the viability of the Sizewell Marshes SSSI and Minsmere levels.

The sustainability of both these important habitats is crucial to the management of Sizewell Belts and Minsmere levels and RSPB Minsmere.

Further information has not been forthcoming. To date we have been unable to access all the information from the applicant's submissions. Due to a FOI from ONR we have received some of the information used above.

Ref ONR FOI response sent to PINS

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-003869-DL1%20-%20Mike%20Taylor.pdf>

I am of the opinion that once again this is proof that the site is unsuitable. To use such massive construction techniques in this unique area with underlying water courses is unthinkable. Particularly as there is so little information on major matters. The threat by SZC to the unique habitat of this vast area of wet land habitat is in our opinion a major dis-benefit that far outweighs any benefits. Once the damage is done it will never be undone. Land heave was experienced when SZB was built with one reactor, this may well happen again and the precautionary principle must come into play. It is out of line with the EN1 Sustainability Criteria.

6 Remoteness of the SZC site and Access Road

1) The proposed Sizewell C site is set on the remote Suffolk Heritage Coast and within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty with many other designations.

The C 228 Sizewell Gap Road, U 2822 Lovers Lane and the B1122 from the A12 are the designated traffic routes for SZA and B stations. At present the SZA and B internal road is the only access to the SZC proposed site.

Permission was given by the Local Authority for felling Coronation Wood to the west of SZA and B to allow for the creation of a Western route to the SZC site for the early years of construction.

To overcome the lack of viable roads to the site the DCO contains an application for an Access Road from the B1122 to the SZC site.

There are no other means of access to the site until the alternative proposed access road is in place which may take 2 to 3 years.

2) The Nuclear complex of SZA and SZB is the only industrial site on the Heritage Coast from north Felixstowe to Kessingland. The coastal strip from Dunwich south to Sizewell north has no conventional highway access.

The AONB and its hinterland are a haven of peace and tranquillity for wildlife and people alike, with its myriad of footpaths, mosaic of water ways and pastoral areas. Locals and many visitors all use these areas for their wellbeing, peace and fresh air and have done so since the monks used the area to collect their sheep and geese. The construction work in such very close proximity to the southern boundary of RSPB Minsmere will lead to a further loss of species. Noise and light pollution will have a detrimental effect on moths and night flying insects.

If this permanent Access Road is recommended for consent and granted the AONB will be dissected and its designation made meaningless.

The peace and tranquillity which is of paramount importance to the area will be totally lost by a massive dual carriageway built from the B1122 to the Sizewell Complex. This route which divides and disrupts the landscape and its ecology is to be permanent.

During the construction period of 12+years it will be the major route to Sizewell for thousands of lorries, cars, vans etc. When construction of SZC is completed the road is to be reduced to a single carriageway, however the scar on the landscape and the road will be permanent and the loss of an extremely sensitive ecological area very severe.

During the construction programme the access road will be the route to the lay-up area, the concrete batching plant, and a car park. At this point the road and car park are within metres of the RSPB Minsmere site.

TASC had repeatedly requested at all 4 consultations that an alternative to this damaging access road should be considered. It was tweaked to accommodate bats at Natural England's request, its present position still has an effect on bats as it disrupts their foraging area.

I consider that building a dual carriageway in the position applied for is in direct conflict with the designation of AONB.

There cannot be any mitigation which would counter this permanent loss and it is hard to consider that any compensation be quantified. The applicant as owners and guardians of their estate has a Duty of Regard for the Suffolk Coast and Heaths AONB, yet they have ignored its designation.

I request that the ExA recommend a refusal of this permanent Access Road with all its additional construction paraphernalia.

7 The Access Road Crossing facility, SSSI and Water courses

To reach the SZC site the proposed access road has to transgress both a SSSI and two water courses, Leiston Beck and Leiston Drain both of which serve Sizewell Belts and Minsmere levels. The SZC elevated site platform has to be reached by a bridge / culvert, taking up land which is a designated SSSI.

To access the site at this point by bridge and access road makes a total mockery of any semblance of sustainability.

The water courses are of ultimate importance to the continuation of the efficacy of the Sizewell Belts and the Minsmere levels, but they are also needed to functionally discharge water in times of fluvial flood, allowing water to drain from a large area to Minsmere sluice. These water courses also discharge water from Leiston Sewerage Works and Sizewell A and B Sewerage works. The culvert/bridge is not only ecologically damaging causing a loss of SSSI, but causes a barrier to the freeflowing movement of water and sensitive water borne creatures. The height and breadth of

the proposed crossing is yet another blight on the AONB. It is vital in these times of Climate Change and weather patterns that we do not create any impedance to the movement of water going to the sea.

Not enough information has been provided or predictions made to convince me that this situation is fully understood or documented by the applicant. It must not be left to chance.

I understand that the EA and Natural England are not satisfied with the latest design of the crossing at this vital pinch point. I concur with their findings.

8 Sea Borne Traffic, Coastal Sea Defences and Flooding Risks

The proposed route of the seaborne route traffic runs co-terminus with the boundary of RSPB Minsmere and encroaches onto the Heritage Coast Walk.

The possible interference with the movement of shingle due to the north south drift and the possibility of erosion is not as yet fully understood, but must not be left to chance. The possibility of a sea defence wall of over 14 metres is not acceptable and is another insult to the Heritage Coast and the AONB designation. It also fails to recognise the increased vulnerability to the coast north and south including on Sizewell B.

9 Transport Strategy

This is difficult to access we are unsure of the outcome of the continuing negotiations between the applicant and the Local Authorities.

a) Roads local to Leiston-cum-Sizewell.

i) For the first few years the branch rail line Saxmundham to Leiston Siding is to be used and loads are to be discharged at the Siding. These loads will then have to be transferred to SZC site.

Heavy traffic use of the C228 and the U2822 will lead to loss of tourism, amenity and quiet recreation. Sizewell hamlet is a popular tourist destination and has a well used caravan park and a Centre of Education and Respite with conference facilities. The weight of traffic on these small minor roads will at times be a combination of traffic from SZA and B, including the SZB outage traffic and all early years construction traffic for SZC. These existing roads are totally inadequate for the amount of traffic.

ii) Lovers Lane U2822/ C228 Junction is also the Heavy Goods Route into Leiston Town serving Eastlands Estate and all major shops in the town.

HGVs using the Rail siding will also have to use the junction.

The junction of these roads is at present totally inadequate for the amount of proposed traffic.

The applicant has not provided a Plan for Traffic in the Leiston- cum - Sizewell Parish.

iii) I also have concerns about the loss or diversion of many footpaths and bridleways in the vicinity of the application. In particular Bridleway 19 which is known as Black Walks is to be stopped up and a diversion put in to replace it. I believe the diversion may not be in place before the Bridleway is closed. The applicant is aware of these concerns and has chosen not to make any changes. The Heritage Coast Walk Footpath 21 diversion causes a much longer walk and has none of the qualities of the Coast path.

It is very disappointing to know large infrastructure plans do not allow for the normal legal practice for revision of RoWs and many well used and historic paths may be lost .

b) Traffic in the Surrounding Area

The A12 is 6 miles north west of the SZC Site. It is not a major trunk road, it was declassified several years ago and is managed by Suffolk County Council. I contest it is not suitable for the 12 years of constant construction HGVs and the many other vans and cars etc which will be needed for the scale expected for SZC. There will be an unbearable imposition on all those who live work and carry out their businesses in at least a 30 mile radius of the A12. Many small villages are served by the narrow country lanes which feed onto the A12. As an agricultural area it is also used by farm traffic.

The suggestion that using more sea borne loads brings its own concern but even with some construction materials in by sea the A12 will be unacceptably congested.

The suggested A12 to Theberton Link Road may remove some of the traffic off the Yoxford Junction and from the small villages of Theberton and Middleton but is unacceptably environmentally and economically damaging.

At least four farms will be dissected by the Link Road and may lose viability, some of which are in the 4th Generation. Many well used country lanes and RoW will be lost to cyclists and walkers and in many cases local people will have to find alternative routes to their homes. Trees, hedges and water courses will be damaged or lost.

The proposed Link Road then joins the B1122 south of Theberton before joining up via a roundabout to the proposed Access Road which also serves the Accommodation Blocks and before crossing the AONB to the Sizewell C site.

To impose this amount of road alterations and traffic disruption into this rural area over 12 years will have a severe detrimental effect on all who use the road network.

SCC as Local Highways Authority must ensure a Transport Master Plan is available which takes account of all facts, data and figures before any consent is given. So much essential detail is woefully absent.

In conclusion

All of the above may not concur with what is expected of a Written Response but I am now in my late seventies having lived in Leiston-cum-Sizewell all my life. I knew Sizewell before SZA was built and followed the progress of the Layfield Inquiry and then watched SZB being built, I have served on the SZA and SZB Liaison / Stakeholder Group and continue to the present day.

I was a serving Councillor both at District and County for two earlier applications for SZC, both of which failed.

I know every nook and cranny of this area and even at my age I do not wish to see Sizewell despoiled by further industrialisation. Or suffer the overwhelming upheaval it will bring to the area.

This is not a legacy to leave for future generations particularly when there are alternative ways for the provision of energy.

Therefore for all the reasons set out above I request the Examining Authority to recommend a refusal of the Applicants DCO for Sizewell C to the Secretary of State.

Joan Girling and on behalf of my partner Michael Taylor

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Leiston

Suffolk

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Joan Girling REF 20026021
Written Representation
To PINS
Suffolk Coast and Heaths AONB/ Landscape
Lack of Mitigation
13-5-2021

Areas of Outstanding Natural Beauty were first established in 1949 under the National Parks and Countryside Act and are now part of the Countryside and Rights of Way Act 2000.

This includes The Suffolk Coast and Heaths AONB nomination for “the purpose of conserving and enhancing the natural beauty of the area”

It is incumbent when exercising or performing functions in relation to, or which affect a nominated AONB, or land in the area of an AONB that there is a “duty of regard” to its status.

A criteria for an AONB is peace and tranquillity. Another is the unique landscape. The Nuclear Complex of SZA and B is the only industrialized area within the AONB coastal strip, between Felixstowe and Lowestoft, and totally incompatible with the characteristics of the low lying peaceful coastal scene.

Sizewell A was built in the 1960s. SZB was given consent in the 1980’s after a long and tortuous inquiry as it was seen to be “in the public interest” and “the national need”

Ref Sir Frank Layfield Report to Secretary of State 1985 HMSO.
Concluded at 108.25 in the Report.

“Sizewell B would be a massive intrusion into the area and that if there was a conflict between a major development and conservation the latter was to be preferred”.

Times have changed since the then Secretary of State gave permission for SZB

We have become more aware of the need to maintain areas of biodiversity and protect and conserve habitats which are rich in wildlife, and which have taken millennia to become enriched with a diversity of species. People need these spaces for their mental health and well being. The mere fact that the Suffolk Coast and Heaths AONB is under threat by this massive complex which is Sizewell C, causes feelings of stress at the possible loss of a beloved landscape and all it maintains. The Suffolk Coast and Heaths AONB enables people from a very wide area to relieve their stress and the quiet tranquillity helps them regain a sense of place.

Building SZC with two nuclear reactors in an AONB to include many additional buildings and pylons etc and dividing the AONB with a dual carriageway which will after deployment be a permanent road.

SZC along with the Access Rd is an expensive and unnecessary folly, causing untold ecological damage, and is totally out of keeping with the AONB and its environs. The intrusion inflicted on the people who live and work in the area including the many people who visit RSPB Minsmere, National Trust Dunwich and the coastal strip.

During construction the cacophony of noise from pile driving, concrete batching plant, trains, machinery, traffic, steel and aggregates movements, road and rail building, deep earthworks, and over 8000 workers will be on site and in the area.

The noise will have a severe detrimental effect on the qualities of the AONB. This was witnessed when SZB was built and is now seen and heard at Hinkley Point C construction site.

Sizewell B dome is visible from as far afield as Halesworth to the west, and throughout the low-lying coastal strip from Southwold to Orford.

If SZC is constructed the height and bulk of two concrete reactor buildings will stand out and dominate a vast area of the coastal strip and will be visible from many points in the AONB dominating the sky line. It will be impossible to disguise or mitigate by landscaping.

The proposed SZC reactor buildings are not in line with SZB and the imposing concrete structures are out of keeping with SZBs white clad dome. We can assume the high level of lighting needed for the area of construction for SZC and all ancillary work will be seen from all the same points of the compass as SZB. Introducing light into an otherwise dark sky area will lead to sky glow over the 12 years of construction.

To consider this taking place over at least 12 years 24/7 is totally unacceptable and is not compatible with the designation. Likewise imposing a 10 +metre high berm wall to possibly extend to 14 metre on the eastern coastal side of the SZC site to protect it from flooding can only be described as a massive intrusion on the Heritage Coast.

Government Legislation in EN 1 suggests that because there is a national need for nuclear power, the AONB designation may be set aside as building SZC is in the “public interest” and that there are “exceptional circumstances”. I dispute these assumptions.

a) I disagree that there is a need for nuclear power; it can be proven that there are more sustainable cost effective ways of producing low CO2 electricity supplies which are available, with more coming on stream.

b) If SZC is built it will not be producing electricity until 2035. The need to reduce CO2 is required much sooner and there are alternatives.

c) The loss of such a large area of peaceful tranquil AONB which is rich in wildlife habitats is not in the best interests of future generations, replacing it with an industrial complex with spent nuclear waste for at least 200 years.

d) As stated in EN6 "Sizewell is a potential site". During the examination of the DCO it must be acknowledged that the site is not suitable. Many matters detract from the concept of building in this sensitive landscape.

Mitigation and compensation.

I do not believe the Applicant has in any way shown how the despoliation of this long stretch of AONB and Heritage coast, the damage it will cause to the ecology, the visual intrusion and encroachment on to the foreshore and loss of the Heritage coast walk will be mitigated. This beloved stretch of coast, its worth to people who seek peace and recuperation is irreplaceable. In fact mission impossible.

There is no compensation that is sufficient to recompense, I believe the Applicant is aware that the loss to the AONB is irreplaceable and priceless and is unable to deliver a plan which in any way to mitigate or compensate for the degradation of this precious area of East Suffolk.

I therefore strongly object to the applicants request for Planning Permission to build Sizewell C.

Joan Girling and on behalf of my partner Michael Taylor

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