

Sizewell C Written Representation – Deadline 2

Mark Beaumont – Interested Party

2 June 2021

Following my Relevant Representation dated 30-Sep-20, I raise the following areas of significant concern over the Sizewell C Application specific to the proposed Sizewell Link Road (Work No. 12B) (“SLR”) and Theberton Hall, which have not been addressed by the applicant.

In particular I comment on the applicant’s Relevant Representations Report (“RRR”), which as far as I can see does not propose one single change to the SLR in response to the many valid objections and comments. I watched many of the Open Floor Hearings, which were compelling in their quantity, emotion and collective strength of feeling against this project. In contrast, the applicant was noticeable by its lack of engagement, entirely consistent with its approach to date.

The applicant would be better served to go back to the drawing board and select a suitable site better able to accommodate two reactors not located next to an SSSI. However, specifically in respect of the application, my comments are as follows:

1. SLR Long Term Legacy

EDF Statement (RRR p104): *“Following the construction period of Sizewell C, the intensity of traffic along the B1122 if there was no alternative route would reduce, but would be replaced by operational traffic and by construction and maintenance traffic which would occur frequently for “outages” at Sizewell B and for the 2 reactors at Sizewell C. SZC Co. considers that there is substantial benefit in retaining the road as a long-term legacy benefit.”*

Response: There would be NO long-term benefit of any SLR except the applicant’s bottom line. Sizewell A and B have not required the SLR since their construction, for outages or otherwise, and Sizewell C will not require it. Instead, the SLR will dissect and ruin local communities and trash local ecology for no good reason.

If planning consent were to be forthcoming, the SLR should be replaced by the cheaper and less disruptive Route W(S) (formerly D2). Route W(S) is shorter (saving millions of kms of emissions per year), will impact fewer Designated Heritage Assets, will be cheaper to maintain and would provide a long-term legacy whereas the SLR is required to be removed after construction as a condition for approval by local MP Dr. Therese Coffey, who said in Oct-20: *“I have suggested that this [SLR] should be removed on the completion of the project though. A permanent road in that location would have a detrimental impact on the landscape and have no legacy benefit.”*

If the SLR is pursued, any consent must be conditional on its removal post construction.

2. SLR Impact on Theberton Hall

Theberton Hall is a Grade II Listed Designated Heritage asset built in 1792. It has been in our family for 25 years and has been painstakingly restored. The SLR will pass some 125m from the Hall on a raised 4 metre embankment.

EDF Statement (RRR p176): “... Further planting is proposed east of the route in this vicinity to minimise visibility from the Theberton Hall estate... minor adverse (not significant) effects are predicted during construction taking account of the mitigation for the proposed link road, which would reduce to no effect during operation once planting has matured”

EDF Statement (Volume 6, Chapter 3 Alternatives and Design Evolution, May 2020, p38): “The proposed amendments to the site boundary include a deeper cutting compared to the Stage 3 proposals, which could introduce an additional change in the landscape around Theberton Hall (Grade II listed, LB 1287529) and increase the impact on the setting of this asset during construction and operation, due to the visibility of the structure. The effect on the setting of this asset may increase from not significant to significant as a result of the proposals in both phases.”

EDF Statement (Volume 6, Chapter 4 Noise and Vibration, Table 4.16, p26):

Table 4.16: Summary of predicted construction noise effects at the nearest noise sensitive receptor locations around the site at different periods

Receptor		Mon-Fri 07:00 to 19:00 Hours and Sat 07:00 to 13:00 Hours		Saturday 13:00 to 19:00 Hours	
		Preparatory Works	Main Construction Phase	Preparatory Works	Main Construction Phase
14	Theberton Hall	Minor adverse, not significant	Moderate adverse, significant	Minor adverse, not significant	Major adverse, significant

Response: This suggestion in the RRR of minor adverse (not significant) noise impact effects is at odds with EDF’s own admission of major adverse, significant effects on Theberton Hall during construction. EDF are contradicting themselves.

This ‘planting’ mitigation was first mentioned in May 2020 (in Volume 6 Sizewell Link Road in both Chapter 2 Description of Sizewell Link Road, 2.2.46) and Chapter 6 (Landscape and Visual). No further detail has been given by the applicant. However, the applicant is now suggesting the planting will only be mature once construction is over. This is unacceptable – the noise impact will be major adverse and significant during construction, not after when the SLR would be removed. The SLR will be on a 4 metre embankment west of Theberton Hall, causing significant light, noise and air pollution and will impact on privacy. This is all admitted by the applicant per their previous statements and must be addressed. Mature planting must be a condition if the SLR is pursued.

3. SLR – Pretty Road Stopping Up – Junction Not Fit for Purpose

- EDF is proposing to stop up Pretty Road and limit crossing to pedestrians, cyclists and horses. Whereas 99% of traffic on Pretty Road is vehicular. In 25 years, I have only seen a horse on Pretty Road once or twice.
- EDF has not commented on this in the RRR despite acknowledging this being raised as an issue by multiple stakeholders.
- If the SLR is pursued, vehicular access on Pretty Road must be maintained (via a vehicular bridge) in order not to sever the local community and their access to Saxmundham. To do otherwise and prioritise horses over vehicles on this road, makes absolutely no sense.