Deadline 2 comments by Aldeburgh Town Council following the Applicant's responses to our key issues

Our Ref: 20026721

Health & Wellbeing and the role of employment or funds to mitigate

ATC believe that the impact on local communities and quality of life has been underestimated by the applicant. In the Relevant Representation report 4:22, EDF say:

A Community Fund, administered on behalf of the local community will fund local schemes to promote wellbeing and enhance quality of life. We note that without the project gaining consent there would be no need for this mitigation. Therefore this is not a 'benefit' which would promote wellbeing or 'enhance' beyond what we currently enjoy. It is of concern that the draft Section 106 states that EDF will have a staff member as a representative on most of the funding Boards approving how funds will be spent. There is no reason for this except where the industry needs to provide information for example on the Housing/Accommodation Board. The Community Fund would not be sufficient to mitigate the harm caused already during the Consultation phases and Examination, during the Construction and then the management and into the very long-term storage of spent fuel on site in a DFS until a nationally GDF is built and accepting spent fuel from the new build site which is predicted to being at least 2140 when it is expected legacy waste will be completed. Research ATC has undertaken (see HPC pre-application Consultation Stage 2 Environmental Appraisal v2 attached) 6.47.3 states that due to the higher burn up of fuel it may need to be stored for its 60-70 years generation stage +100 years after removal from the Hinkley Point C reactors before it can be sent to GDF, so this may be as late as late 2190s and SZC if consented it would be later than this. How can the harm to our community be mitigated for 200 years into the future? The Community Fund should be increased substantially and remain a lasting benefit for the whole period of generation and final decommissioning.

The Applicant claims that mental and physical health and wellbeing is paramount and that mitigation applied will reduce adverse effects on health and wellbeing. The only effective solution to reduce adverse effects on mental health is counselling or relocation/removal of harm, or not causing the adverse effects in the first place. Physical health may require treatment or physiotherapy. No robust funding strategy is in place to provide funding to acute or community health services, or voluntary support service infrastructure. The crucial point is that most of the 'cure' advocated in social prescribing or the protective factors for mental and physical health problems, such as; enjoying nature, physical activity in clean, fresh air, such as safe walking or cycling, witnessing the sound of birds etc. are the very things that will be lost.

In response to our comments that the project will have negative effects on mental health of residents and visitors caused by relaxation and quiet enjoyment being diminished by works and influx of workers, the Applicant says:

"provision of employment and associated income generation is considered to have a beneficial effect on the local community." ATC believes this is patronising and misses the point. It's about so much more than money, no mitigation can compensate for not being able to safely cross a local road or drive to visit

RSPB Minsmere for a quiet walk. One person having a job especially as 'local' includes Suffolk, Norfolk, Essex, South & East Cambridgeshire cannot compensate loss of wildlife habitat here enjoyed by others! And one job at SZC may cause the loss of a job or jobs in the Tourism industry as visitor numbers decline as a result of the industrial construction. This area has a low level of unemployment and we currently have a deficit of applicants for jobs in Hospitality and Care settings. This is where investment is needed in training local young people.

EN6 also recognises the benefits of employment, we therefore need to protect those employed in the industries linked to Tourism, directly and indirectly. Evidence from the construction of Sizewell B indicates that although there may be 'boom' years this is followed by 'bust' and inward development is restricted due to planning limitations due to Emergency Planning guidance. So having a new nuclear power station will not bring jobs it will take jobs from the local communities. There is no legal method to award employment based on home postcode. EDF have also confirmed to reduce costs they will be bringing trained workers on from the Hinkley Point C project.

<u>Air, light and noise pollution, and vibration due to construction, equipment use and traffic</u>

ATC acknowledge that air, light and noise pollution and vibration can both impact health and well-being of individuals and impact negatively on Tourism, Arts, Heritage etc. We will provide more evidence during the Issue Specific Hearings.

The Applicant claims they have identified measures to reduce impacts of air quality, noise and vibration. However, there are elements which cannot be mitigated such as a four-day, 24hour constant concrete pour for each reactor foundation or nuclear island. Once started this cannot stop and there is no mitigation outlined such as which days of the week if there is a choice for this and where precisely this falls in the overall timeline? With 1000 or so lorry's full of concrete needed.

EDF recognises " there will be significant adverse effects on the users of recreational resources due to views of the development, impacts on tranquillity, and pressure of additional visitors". They propose enhancements to Kenton Hills car park, new sports facilities at Leiston; Community Fund as above. They commit to providing measures that will keep routes open and minimise diversions, but cannot avoid effects of changes in noise, air and light quality, views and traffic. It is also not possible to quantify how long it would take for wildlife to return to their habitats following disruption.

In response to anxieties expressed about the effect of increased traffic on Emergency Services:

EDF claim their assessment shows the impact on journey times is "considered to be imperceptible". ATC would dispute this and ask that the Applicant quantify this impact. Has research been undertaken with the Emergency Services and data obtained direct?

In response to concerns that the project will cause unsocial behaviour:

The Applicant refers to Code of Practice, Community Fund, Tourism Fund, Section 106 agreement, Housing Fund (to be spent within 1st 7 years) focussed on improving capacity and quality of existing accommodation. There is no commitment to providing new housing or housing that will become legacy benefit. It is outrageous to build an accommodation hostel only to remove this when no longer required. If a more suitable location was chosen, this could provide a vital and useful source of

accommodation in the future – either during the regular maintenance outages, or to travellers. Providing accommodation for workers where there is the infrastructure they need (such as Ipswich or Lowestoft) along with a bus provision to site (workers to be paid from joining the transport) would encourage use and remove the risk of antisocial behaviour (witnessed during the construction of Sizewell B) in the small rural communities surrounding the proposed nuclear site.

Choice of site and siting strategy

The National Policy Statement for Nuclear Power Generation (EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales. This gives 8 possible sites one of which is Sizewell. It does not specify which sites should be chosen by the developer or how many reactors can be built on them although ATC notes the significantly smaller footprint of the site at Sizewell C compared to Hinkley Point C.

The 2017 Ministerial Statement indicated that the Government considers that neither NPS EN-1 nor NPS EN-6 "has effect" for the Sizewell C DCO Application and that if the decision on the Application were made today, it would be made pursuant to section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be relevant to the Examination of Sizewell C Project.

Thus there is a dichotomy here: If the choice was made under the auspices of EN-1 and EN-6 and because these are no longer applicable due to the plant not being on line by 2025 and the DCO is being pursued under section 105 of the Act. Is there not a case for the re-examination of the choice of site given it's well-evidenced unsuitability.

Should therefore the choice of site have been re-evaluated with this change especially in light of the more recent decision to keep nuclear waste on site in a flood prone area? In fact can the developer use the "urgent need" in The EN1 – EN6 policy as justification in this instance.

Again Long term negative impacts from visual impact have in no way been netted into the economic impact assessments – only the positive impacts. The construction of these reactors does not conform to the provisions of EN-6 in regard to the AONB and given the apparent confusion around EN-6 and section 105 what provisions do cover the build? In terms of impact.

At Table 4.7 the Applicant has said that: The design has sought to minimise the land required for construction and operation of the power station and minimise disturbance to as small an area of the landscape as reasonably practicable. The footprint of the operational site has been compressed to reduce land take in the AONB as well as the Sizewell Marshes SSSI and is approximately 30% smaller than Hinkley Point C.

ATC conclude that it is very evident that the original choice of the Sizewell site was fundamentally flawed: The site is too small for the proposed construction of two reactors. This is evidenced by the significant changes that have been made to make the construction fit;

Such as;

The proposal to relocate infrastructure from Sizewell B to other land so that EDF can utilities this land. The felling of Coronation Wood was completed early in 2021 under planning permission ref. DC/19/1637/FUL for the relocation of certain Sizewell B facilities. These facilities are currently located within the site nominated for Sizewell C and therefore need to be relocated.

The felling of Coronation Wood, it would appear, was done to facilitate the movement of facilities to allow room for SZC. DC/19/1637/FUL was therefore erroneously passed as the council planning committee were repeatedly informed that the two were not linked, and that relocation was necessary for the continued generation of the SZB site to 'keep the lights on'.

The pylons added to take the power from site rather than undergrounding which is becoming the norm in AONB situations where in other areas they are being removed. It would seem that time and cost were the main considerations not the provisions of EN-6 or appropriate regard to the AONB status.

The Applicant's claim that they have managed to use less land is disingenuous as they basically had no choice and the lack of space has caused detrimental compromises to be made.

The areas transport links and other infrastructure are woefully inadequate to cope with this size of construction and workforce without considerably more investment than is currently being proposed. The areas transport infrastructure also feeds into the question of emergency situations where an evacuation may be called for. This is especially relevant as there has recently been a regulatory increase in the area affected which impacts several more communities.

At Table 4.7 the Applicant claims: The development of the scheme design has taken place through extensive consultation with the local community, statutory bodies and other relevant stakeholders on its development proposals through numerous events; public exhibitions and workshops, during all stages of the design process.

Whilst It is true that consultations have been extensive this does not mean that any significant changes have been made to the design other than those which are detrimental or suit the developer. ATC have many examples of where changes could have been made which the Applicant has resisted, and changes which they have made which are not what communities requested.

Siting the construction in an AONB imposed extra considerations on the developer, in Government energy policy EN-6, to consider the design of the construction to fit within the landscape. However, the design is generic (again to ensure reduction of costs) and the building design has not been modified to fit the AONB situation. The appointment of a designer to offer

cladding colour options would not seem to fulfil the EN-6 criteria. No consideration has been made for the layout or positioning. And communities' suggestions have not been incorporated.

ATC will provide more evidence during the Issue Specific Hearings on this topic.

Flood risk and coastal processes & BLF + soft/hard sea defense strategy

Aldeburgh is a coastal community. Flood risk and coastal processes are inextricably linked along this coast and is an outcome of many, mostly cumulative and not necessarily linear impacts, which are difficult to model in the long term with the assumptions and physics open to debate. The statistical outliers are, in some cases becoming more common e.g. a 1 in 500 year storm may become a 1 in 100 year storm due to climate change. The coast suffers from erosive effects which are difficult to predict and change with time. Global sea level rise is universally predicted due to Global Warming. Global warming is having an effect on global wind speeds meaning that the likelihood of exceptional tidal surge effects are growing more frequent and of likely greater magnitude. The coastline is suffering from the tilting effect of the whole UK caused by isostatic rebound after the last ice age combined with a North Sea silt load which is preventing the east coast from rising and even possibly causing some sinking.

The modelling of all these factors and their cumulative effects is subject to uncertainty as the underlying assumptions and physics may have flaws. It is questionable whether all possible flood risk factors have been taken into account e.g. subsea continental shelf slips, or the possibility of the Island of La Palma Volcano splitting and slipping, both causing ocean wide tsunami effects cf. Fukushima. Such occurrences are quite common on geological timescales, probably follow a Poisson distribution and cannot be dismissed as low probability as there are few happenings to base a probability assessment on.

Whilst the developer acknowledges the risk of flooding the responses given are not detailed in many aspects relying on: "The assessment demonstrates that significant effects on groundwater would be avoided through measures embedded within the Project proposals" However not all these measures are detailed apart from many SuDS.

In Table 4.7 the Applicant confirms that: The UK Government policy requires that for new nuclear builds, the spent fuel is to be stored on-site until the availability of the Geological Disposal Facility.

Adding to the dangers of a catastrophic site flood is the storage of nuclear waste on a coastal site for up to 200 years. This appears to be an additional risk that does not need to be taken as this is easily remedied and the waste should be transported to a high-ground repository to minimise the risk. A Cotswold site would seem suitable for interim storage. Storage on site may be expedient and "satisfactory" for government purposes but does not seem to be a logically satisfactory solution for any coastal reactor site.

In Table 4.32 the Applicant states: The flood risk to and from the development has been assessed in relation to all forms of flooding and the proposed development has been designed to be safe and operable under foreseeable conditions.

However, this phrase implies that only a subset of flooding events has been assessed for impact. It would be wise and indeed should be necessary for the developer to enumerate these. It would also be wise for the less predictable catastrophic events to be assessed (the known unknowns).

The hard sea defence solution has recently become much less in favour, becoming increasingly passed over for softer and more resilient defences such as salt marsh.

Hard sea defences are also more prone to effect coastal longshore drift erosion and deposition and the hydrodynamics and consequences are difficult to model. This also applies to such items as a beach landing facility which will be in place for the life of the site (200yrs+) and to a lesser extent a jetty for material deliveries, though this could be removed.

In Table 4.32 ATC is concerned regarding the volumes of fresh water that such a construction may require. The “how much” and “where from” are of considerable concern in this dry area. If too much local ground water is used there may be an inwards “flood” of the freshwater/seawater interface underground, leading to the groundwater becoming brackish and therefore of little value. It would be wise for the developer to explicitly rule out ground water abstraction on or near to the site.

Of concern to ATC is that given this coastal site there appears to be no duty or obligation on the developer to plan for worst case outcomes in terms of remediation and compensation of the local population and of course the natural surroundings. The only events that seem to have been given this focus are radiological incidents. This would surely seem to need addressing before rather than after construction as lengthy, costly legal battles would sure ensue after any major event.

<u>Traffic and transport strategy</u>

In 4.3 the proposed freight management and transport strategy the Applicant states:

SZC Co. has continued engagement and Project development to optimise the movement of materials by rail and sea. The accepted changes (April 2021) to the Application allow an increase in rail movements to 4 trains per day and to provide an additional temporary beach landing facility. These changes would enable 60% of materials to be brought onto the site by other modes than road transport.

The developers transport strategy is quite rightly focused on the Heavy traffic involved in the construction phase. It is welcome that the developer has finally acknowledged that traffic is two way and will monitor traffic leaving the site as well as arriving. However, by this stage of the

DCO process the strategy should be well defined, disseminated and readily understood. This is not the case.

With the rail options and beach landing facilities being resurrected during the DCO examination. Whilst it is welcome that these options are being re-examined there seems to be no reason for the outcomes of the reappraisals to be different from the previous rejections during the consultation process. It seems rather a PR exercise to show willing and impress the inspectorate. No decision should be based on these unless firm and quantifiable proposals are in place along with support from Network Rail and the MMO and other organisations.

The more HGVs that in theory can be taken off the road by increasing train traffic the better. However, it is obvious that this may not be possible to achieve. And trains will significantly and adversely impact individuals and communities along the trackway throughout the night, night after night.

In Table 4.31 the Applicant states: The management plans will be monitored by SZC Co. and monitoring results reported to the Transport Review Group (TRG) on a quarterly basis throughout the construction phase. The TRG is proposed to be governed in a similar way to the TRG at Hinkley Point C, which has been successful.

However, ATC believe a quarterly review seems to be a rather long period for review especially in the early years before the road infrastructure is built. We would request that the mitigation infrastructure be in place before the impact requires this.

Due to our position, and the boundary to the East caused by the North Sea there is a small network of roads which are vitally used by our residents and visitors. The major artery of interest to this council is the A12. The A12 is a road that has suffered from a large investment deficit with some sections almost at capacity at peak times. The developer has indeed offered to improve some sections (two villages bypass etc.) but sections (around Woodbridge) are in dire need of capacity increases and the four villages bypass was a better option for the communities affected. The Applicant has failed to provide adequate justification for why this cannot be included – other than cost.

A link road was almost a necessity as the roads available from the A12 to the site are really not suitable given the volumes expected and the community impacts involved. However a great many still believe that the “D” route would have been a better option. The Applicant introduced the new link road (SLR) late in the process and in a completely wrong location against the views of the local communities, The SLR will cut villages in half and will either close or render other well used routes impossible. There is no real consideration of other concurrent projects particularly with regard to LGV traffic (see below).

There is also much concern re: the phasing of the early years infrastructure builds as these still leave much traffic to the site using existing roads. The early years transport policy needs to mitigate this.

In Table 4.14 the Applicant introduces the Freight Management Facility as a welcome addition. Again we would note that if the project is not consented this would not be needed. The sheer volume of HGVs making the B1122 as busy as the A12 is unthinkable and hard to accept with any management plan in place.

Positioned to the South of the site the FMF may be well placed to receive HGV traffic from the west and south along the A14 and A12. However, traffic from the North and West along the A17, A47 and A12 would need to traverse the A12 twice.

Regarding 4.16 air quality, the Applicant has not addressed fully the use of low emission vehicles across all modes of transport. Park and Ride busses would need to be zero emissions in addition to all HGVs and LGVs making deliveries, and this could be made a condition.

Of continuing concern to this council is the total absence of any strategy to cover the LGV and car (worker) traffic generated. This issue has been raised repeatedly and has not been satisfactorily answered. This is likely to be substantial and may be on a par with the HGV numbers, and needs addressing as rat running and fly parking could become a serious issue to local communities. As well the likely cumulative impact on these flows from other NSIPs projects cannot be overlooked and should be accounted for.

<u>Concerns relating to EDF Energy's track record and examples for delivering nuclear Projects over- budget with delays and technical failings.</u>

In Table 4.6 the Applicant states: The UK EPR™ design is based on the Flamanville EPR™ (FA3) plant being built in France but incorporates a number of design changes agreed through the Generic Design Assessment with the UK Regulators. The EPRTM is a proven reactor design which is now in full commercial operation in China (Taishan 1 and Taishan 2).

However, the two plants being constructed in Europe are both behind schedule and over budget and in Finland subject to legal scrutiny. Also is it appropriate to use the two Chinese plants as evidence considering the differences in regulatory regime and Human Rights, employee management etc.

ATC will provide more information at the Issue Specific Hearings with regard to 4.6 Legacy of the Sizewell C Project and Table 4.17 Amentity and Recreation.

In summary although the Applicant insists that the benefits will be deliverable, there is no nett economic benefit calculation throughout the life of the Construction through to final decommissioning. This would be a fundamental requirement to prove overall benefit.

Table 4.18: Climate Change. A great deal in this section is predicated on the grid average comparison approach methodology. However, this approach to low carbon electricity is fatally

flawed in that other methods of electricity supply notably the proposed interconnectors at Friston do not even assume low carbon sources. These sources being a composite of continental electricity production including much from German Brown Coal and Russian Natural Gas (Nord Stream II.). It appears to the Government that energy security is more important than real low carbon.

Safety

In Table 4.24 the Applicant attempts to reassure us that the construction will be safe in operation from a design point of view there is no real assurance that the plant and nuclear waste store are not vulnerable from some large flood events over it's protracted (300yrs +) existence on this coast until spent fuel is sent to a GDF. The Applicant in a recent BBC TV programme has said it will be another Ice Age before the site is decommissioned.

There are also concerns re the structures ability to with stand a 9/11 event. As far as can be ascertained there has been no real-life test of a full-sized structure of this nature to withstand major accidents or disaster.

ATC will provide more evidence at the Issue Specific Hearing on this matter.

Finance and Governance:

The project is not financially viable and will put unnecessary and unjustified burden on taxpayers especially in the context of the need to recover from the Covid crisis and given that the end cost in any event is much greater than that of other methods of electricity generation. The costs at Hinkley Point C increased beyond expectation. Chinese involvement with their record of Human Rights and risk regarding data protection and political influence is unacceptable. Other sources of funding drying up.

The Applicant's response (Table 4.4; p 37) sounds uncertain 'expected to be made up of third-party investors'; 'not yet been fixed' with reliance on pension funds and foreign investment. EDF energy & China General Nuclear (CGN) have provided funding for development, but no plans are revealed for the future.

Also the Applicant states: 'the Government has been clear that costs must come down' (4.4; p 38). Part of the plan is to reduce costs by 'replicating the design of Hinkley Point C' where EDF say that they have learned how to set up the supply chain and to train key workers. 'With the right timing, there can be a direct transfer of skills from Hinkley Point C to Sizewell C'. (p38) This may reduce costs but it also must mean a reduction in local recruiting here.

At present there is no evidence concerning the eventual cost of the electricity itself, except that the current cost of nuclear is about double that of wind. ATC understands that many potential Pension Fund investors have withdrawn their offers of financial investment such as; Prudential, Aviva, Legal & General.

Wylfa power station near Anglesey is relevant on the subject of funding and also on the subject of the environment and governance. Horizon Nuclear Power was bought by Hitachi in 2012. The Government

planned to invest £5 billion but there was then a dispute between Hitachi and the Government. In December 2020 Hitachi withdrew its DCO application. There appears to be lessons that need to be learnt from this. It is unclear whether the SZC power station if consented and once constructed will remain under the ownership of EDF?

Environment

ATC notes the new commitments announced to preserve the environment/wildlife. There is increasing evidence that nuclear fission is a thing of the past, not necessarily because of advances in fusion but more because of better alternatives; we all know about wind and sun, but there are also major steps e.g. towards the use of green hydrogen, see DEME press release in forwarded email.

Climate change is mentioned in 4.18; pp 137-149, largely in order to try to prove that a 'grid average comparison' gives an accurate picture of carbon emission reductions. The answer given is widely seen as faulty. What is more it does not allow for much increasing demand for low carbon construction and production. Also, experts on the subject (article in the Times by Dr Paul Dorfman, UCL) reckon that there is a high risk of this site being frequently flooded by 2050.

The major Bridleways are the Sandlings Walk and the Suffolk Coastal Path which both take the route on the seaward side of the site. The whole area has numerous footpaths and is important for recreation and for biodiversity. It is admitted in 4.17 that there will be an air quality problem during construction.

Crucial in representation concerning these environmental matters is the recommendation to the Secretary of State (SoS) by the Planning Inspectorate not to go ahead with the proposed Wylfa power station because of biodiversity issues. That recommendation came before the disagreement between Hitachi (which owns the applicant: Horizon Nuclear Power) and the Government over finance. This latter dispute has led to the rejection of the major nuclear plans for the site, although there is discussion concerning other possible uses.

'In the interests of openness and transparency', the Planning Inspectorate decided to publish its Recommendation Report; it did this recently: on 4th February 2021.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010007/EN010007-003948-Recommendation%20Report%20-%20English.pdf

The report contains many points which are significant for applications other than Wylfa. It provides a list of Principal Issues (4.2.2 p 42) which include: Air Quality including Dust; Biodiversity; Climate Change and Resilience; Landscape and Visual; Marine Environment; Noise and Vibration.

Annex G is entitled Considerations for the SoS. 1.4 (Annex G) covers a number of biodiversity issues and the need for long-term management plans because of the long-term liabilities and risks.

1.5.3 relates to detailed marine mitigation plans (which had not been submitted by the applicant)

1.9.1 draws the SoS's attention to the fact that data on climate change is changing all the time.

In conclusion the Applicant's response to the relevant representations is somewhat useful not all issues brought up have been addressed within it. Some of which are highly relevant, but it is the developer's choice of what is a KEY issue.

Thank you for this opportunity to provide comments on the Applicants responses.