Sizewell C Case Team National Infrastructure Planning

02/06/21

Dear Sir or Madam

Re: EN010012 - The Sizewell C Project

My reference: 20025555

I should like to add a few further comments if I may on the SZC power stations planning application, as an individual Interested Party, having read EDF's responses raised in response to relevant representations 9.1 SZC Project - Response to Relevant Representations – May 2021 (yet another unwieldy document to search through to find correct references).

# 4.18 Amenity and Recreation/4.22 Health and Wellbeing

I do feel the need to restate strongly my objections to the construction of two further nuclear power stations in this Area of Outstanding Natural Beauty, and in this most sensitive vulnerable Sizewell C site. I make those as a person who lives, works, volunteers in and enjoys the East Suffolk area for my leisure activities, and know what it brings to my (and so many others') health and wellbeing. I have always 'staycationed' here precisely because it has so much beauty and biodiversity to offer. Yesterday I was out nature watching at North Warren, within view of SZB, and walked through the village of Thorpeness, which was absolutely packed with families and hundreds of visitors enjoying the area and facilities, and walks. And very nearby we watched wildlife such as Marsh Harriers, Chinese Water Deer and Kingfisher, and 6 types of Warblers in the fields and nature reserves (Reed Warbler video attached – taken just 50 metres from the main coast road - you can just see Sizewell B at the end to the North in the distance). This is the true character of East Suffolk as we all know and love it. Nature is part of the package here which people live alongside and buy into as tourists. They're not snobs or NIMBYs or developers hungry to make a profit. They are people who were born here or have chosen to live and holiday here because they love this beautiful environment and the wildlife, and hope to protect it for their children to enjoy. Will tourists still come if SZC is being built and they perceive road delays, loss of amenity in the area?

## 4.19 Climate Change 4.25 Major accidents, 4.27 Material and waste

"SZC Co. must demonstrate that it has a robust plan in place to decommission the station and manage any liabilities (including waste), a robust cost estimate to deliver the plan, and arrangements that ensure that SZC Co. sets aside funds over the operating life of the Sizewell C power station to cover these costs in full."

The march of time has now overtaken the SZC project. It is an outdated over-expensive high risk energy technology now, and nobody wants to pay for it unless they get large dividends in return, which risk the taxpayer footing the bill. It is out of sync with new climate change imperatives. Its toxic waste and large scale accident risks are no longer acceptable today, when clean renewable energy sources are coming onstream at a rapid rate to provide continuous energy to displace it. Energy demand is a contentious subject, SZB is currently closed down for (extended) maintenance without causing apparent strain on the National Grid.

## 4.2 Ecology and Biodiversity

For myself, I have lived in this area, which I love, for 27 years, currently am semi-retired and work for a local community charity part-time, have a degree in Environmental Science and a Postgraduate Diploma in Conservation Management, and am someone who tries to keep myself informed of latest developments on the state of Biodiversity locally and globally. I say this because I think the environmental impacts of this project must be considered against a wider context to just this site in East Suffolk.

"The UK only has half of its natural biodiversity left. When compared to the G7 countries, this puts the UK is at the very bottom in terms of how much biodiversity still survives. When compared across all countries in the European Union, only Ireland and Malta come out worse, and the UK is in the bottom 10% of all countries globally". (<a href="https://www.nhm.ac.uk/discover/news/2020/september/uk-has-led-the-world-in-destroying-the-natural-environment.html">https://www.nhm.ac.uk/discover/news/2020/september/uk-has-led-the-world-in-destroying-the-natural-environment.html</a>)

EDF states "Impacts on the ecological receptors within Minsmere will be limited in part by the distance of the proposed development to most of the reserve, but also specific measures have been embedded within the proposals to address possible impacts". This language deliberately makes the SZC site appear somewhat distant from Minsmere, and so attempts to minimise perceptions of the degree of impact on the reserve. In fact other dimensions of the boundary of SZC and its associated sites are several times its distance from Minsmere, and as both sites are obviously linked through hydrological connections, it is not accurate to suggest damage Minsmere's wildlife might be limited due to their linear 'distance' from SZC, as it shows total misunderstanding of how wildlife uses this coastal fringe and hinterland. For fast flying birds such as the Cuckoo, who annually migrate over 7000 miles, the distance between Minsmere and the Sizewell power station is a blink of an eye, as they can cover it so quickly and so be in danger of effects of injury or pollution within seconds of leaving the safety of the reserve. They and other species will not of course have the luxury of prior knowledge of the location of mitigation sites.

In the end the decision will be a national political economic and strategic one, so I do hope this public consultation process has not been futile, in terms of how much influence it may yield over events.

Sadly at the end of the day it seems to be about who has most resources for media campaigns and for IT consultants who can work up the highest figure on the Biodiversity Net Gain spreadsheet, both of which need approaching with scepticism where commercial bias may exist. Blanket clever media campaigns can be very persuasive (?accurate) especially when they purport to offer an instant (?sustainable) solution to employment deficits caused by the pandemic.

Creating a Biodiversity Net Gain figure can be a misleading exercise in the wrong hands, done usually by reparcelling land based on what you *think* you are going to create, often without full ecological understanding, and then multiplying that by as high a value as you can muster. A bit like dismantling the leaning Tower of Pisa and then reassembling the bits to make a now vertical structure but which is now 20% higher, but in the process destroying its iconic identity, evolved through years of geological and gravitational effects, and thus losing its most valued and distinctive characteristics. Other routes such as the Rochdale envelope have also been employed which in effect enable the applicant to provide minimal information which might be open to challenge if more was provided or revealed or even known.

Such creativity could work well if based on reality, and done in collaboration with those with understanding of the site, but if in the end it does not work in practise due to shortfalls in surveys or calculations, that can lead to the opposite effect, of biodiversity net loss or even total destruction. This is what I personally believe will happen with the Sizewell C nuclear power station project if approved, and concerns me the most, as looking at previous nuclear industrial activities around this site, spending on mitigation schemes and monitoring seems disproportionately low compared to the amount of PR publicity these low quality sites have been exploited for by EDF, and particularly considering the higher environmental value of the SZC sites earmarked for, in worst case scenario, complete destruction, and in the best case scenario, possibly lethal pollution. Once consent is given it is very hard to claw back any protection for wildlife.

When one looks at some of the mitigation sites such as at Halesworth, I do feel that EDF have believed their own hype and exaggerated how effective these schemes will be in providing successful replacement terrestrial habitats for wildlife like Marsh Harrier who are adaptable, but have quite specialised needs to breed successfully.

EDF also I suggest mislead the public by advertising how 'green' and 'Carbon Net Zero' their production of nuclear energy is, by not including major parts of the process such as construction and decommissioning. The harmful effects on wider marine wildlife of a beach landing facility in addition to daily operations are only superficially explored, and ignore, for example, mitigation

options for the major collateral damage that could be caused to fish stocks through cooling and discharge operations. Environment and Wildlife management organisations have consistently described the applicant's ecological surveys and environmental information as 'inadequate'.

I remain shocked by the precipitate destruction of Coronation Wood community woodland adjacent to SZB, all carried out in the absence of required Bat licence, which makes it patently clear wildlife is not as much a priority for the applicant as they would like us to think. The regulations must be a primary concern, and it makes me worry about any future operations and how much regard will be given to wildlife protection legislation if this massive project goes ahead. In the current situation so many species are declining that this project has the capacity to wipe out swathes of interconnected sensitive species which are now 'living on the edge' and nationally endangered, at a time when there is national awakening to the rapid loss of biodiversity that is taking place and the publication of the Biodiversity 2020 government strategy.

Some examples (there are many more) of local 'red-listed' species are Natterjack toad, Barbastelle bat, Stone Curlew and Nightjar (both the latter active mostly nocturnally and so particularly susceptible to night time noise and light disturbance) and that most iconic British bird, the Cuckoo, who along with the Kittiwakes, Terns and many other migrants will find their flightpath, feeding and nesting grounds seriously impeded or blocked by SZC. We're not just talking about the Marsh Harrier here but literally dozens even hundreds of species which have become rare, like the beautiful Scarce Tortoiseshell butterfly and the localised Minsmere Crimson Underwing, which could have their last strongholds and fragile balance tipped over towards extinction if the inevitable environmental degradation from this massive project is permitted in this wholly inappropriate area. Most of these are so specialised they will not do well if their traditional homes and sites are disturbed. Simple reintroductions are not the answer without preparatory years of creating healthy interconnected habitats beforehand. No one has the right to make another species extinct.

See photos from Hinkley Point C construction in local press to appreciate scale of potential effects:

https://www.somersetlive.co.uk/news/somerset-news/gallery/hinkley-point-photos-construction-nuclear-4186281

As if evidence were needed of the national interest in British wildlife, more people in the UK tuned into BBC Springwatch than the Great British Bake Off!

https://www.broadcastnow.co.uk/ratings/springwatch-edges-out-bake-off-pros/5160008.article

## 4.3 Socio-economic effects

I was particularly affected by the comments of the Suffolk Police Deputy Chief Constable (Rachel Kearton) about the Police's Community Safety 'concerns' regarding the applicant's existing impact assessments and mitigation measures, around effects on current levels of police resources, law and order, transport, and emergency service responses. Security is the foundation of a happy existence. How does that make any local resident feel, if their ambulance or fire appliance is likely to face severe traffic delays in reaching them or their precious loved ones in a life-threatening emergency?

Having lived and worked in the area, now in Ipswich, I remain sceptical about SZC construction job opportunities for local people. This is because there are many new housing building sites around East Suffolk these days, and if you care to look at most of any scale, you will see most are managed and staffed by out of county site managers and skilled workers, and mostly unskilled Ground Workers/Labourers who travel up and down the A12 from Essex/ London every day due to the short commute time. Simply put, site supervisors select low-risk known people who they know will graft for the minimum money. They do not like taking a risk on people they don't know. There will no doubt be many former employees from Hinkley Point C in the Workers Campus at SZC as the site supervisors have no loyalty to Suffolk, and to be fair they just want to execute the job and they want it done quick (may be on a financial bonus system) and will no doubt cherry pick the best performing workforce already known to them. They want a workforce who are familiar with working on a

nuclear site and living in accommodation block conditions. Just watching a BBC programme about Hinkley Point C confirms the necessary training and cohesion in the workforce.

Also the Foodbank where I volunteer reconises the highest number of needy in Ipswich seem to be single males in their 30s and 50s (<a href="https://www.ipswichstar.co.uk/news/income-deprivation-for-every-suffolk-area-8017798">https://www.ipswichstar.co.uk/news/income-deprivation-for-every-suffolk-area-8017798</a>) despite this current building 'boom'. Labour is imported into Suffolk every single day and that will not change, and may even be accentuated, with SZC.

## 4.32 Transport

Locals have shown great concern (and stress) about road transport traffic increases and the impact it will have on their local life and services.

On rail transport, have impacts on passenger rail services really been fully addressed? How are local people feeling at the thought of having trains passing along the local railway line eight times a night? There are so many serious underexplored economic, mental health and wellbeing impacts which have not been considered.

#### **Virtual Communications**

"COVID-19 lockdown has restricted the ability to view the plans and to organise objections to the Sizewell C Project, thereby, limiting the ability of the public to fully participate in the process. SZC Co. are progressing with the Sizewell C Project during the COVID-19 lockdown to avoid full publicity"

The views above show I am not alone in my views. It has to be said the mobile bus 'exhibition' was a cheap dismal failure and not well attended, perhaps due to lack of publicity. When I attended and asked 'What about Bats' the response I got was "Bats!" as if I wasn't even asking a serious question.

My views as an objector are compounded by frustration at how much the virtual communication issues have unjustly disempowered the local community, some effects from which we will never be aware of due to their lack of inclusion. Also ignored were factors such as local elections and a second locally ongoing planning enquiry which reduced time available for local civic officers and individuals to participate effectively. I feel this has patently stacked the odds against local community involvement (objectors and supporters both) and skewed the nature of this particular enquiry to the public's disadvantage, especially considering all the changes that have been made to this complex application along the way, and all the volumes of information and the tight deadlines that have had to be read and met by local people - as well as them having to quickly get up to speed with using online communications such as Zoom (if they have the technology) in an area with very variable levels of Broadband performance

In conclusion, during the pandemic, we have all re-evaluated the factors which are most important to provide us a with meaningful happy life, and which have so sustained us during lockdown, and which give us a sense of wellbeing in life.

Top came out family, carers, friends, and Nature. This massive project on this vulnerable highly sensitive site is entirely inappropriate and should not be given consent because of the extensive potential damage and serious hazards that could occur during its construction and operations.

Thank you for registering my comments.			
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Yours sincerely		Denise Johnson	