

Sizewell C Development Consent Order

Response to July 2021 Issue Specific Hearings

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My family and I live at [REDACTED] in Eastbridge, just 400m from the proposed Sizewell C construction site. I am a Chartered Town Planner (MRTPI since 1989), a Director of Stop Sizewell C and member of the Minsmere Levels Stakeholder group. This is our response to the Sizewell C Development Consent Order July 2021 Issue Specific Hearings.

On 2nd June 2021 we submitted our written representations to the Planning Inspectorate regarding the Development Consent Order. These covered our response to the key components of the Order, i.e. the proposed Accommodation Campus, borrow pits and Spoil Management proposals close to Eastbridge; the inadequate transport infrastructure proposed by the applicant; impacts on the landscape and built heritage and the appalling impacts on the natural environment; economic and social impacts; the cumulative impacts of the many energy infrastructure projects planned for East Suffolk; and, should the DCO be approved, the importance of the applicants Draft Development Consent Order in minimising local community impacts.

Our written representations listed reasons why the DCO should be rejected, but also recommended planning conditions, planning legal agreements and other safeguards should Development Consent be given.

Between 6th and 16th July I witnessed much of the discussion associated with the Issue Specific Hearings (ISH) organised by the Planning Inspectorate.

Our objections to the proposed development have not subsequently altered in any substantial way following the ISH because the applicant has consistently failed to present arguments that illustrate adaptations to the project that will protect local communities and the environment. Repeatedly the applicant tried to suggest that a decision on the project was urgent in order to assist in achieving the governments net zero carbon targets and that in this regard the development needed to be built and producing power by 2035. We do not believe this is correct; Government policy is out of date and remains to be updated. The climate emergency does not begin in

2035 and must be addressed now and not through the lengthy, costly and cumbersome project that would be Sizewell C. And the applicant has continued to fail to progress the project through the successful involvement of all of the agencies and local communities that remain aghast at its failure to do so. Sizewell C remains the wrong project in the wrong place and at the wrong time.

We believe that the Planning Inspectorate's recommendation to the Secretary of State should advise that the cumulative adverse impacts of the proposed development on communities and the environment considerably outweigh the claimed benefits and, as a result, conclude that the proposed development should be rejected.

Summary of Objections to Sizewell C

I have repeated and adapted our summary of objections below and ask the Planning Inspectorate to continue to scrutinise all aspects of the DCO. We continue to express our concern about community and social impacts, the inadequacy of the applicant's transport strategy, the long term damage to a flourishing visitor economy and their calamitous approach to the many environmental issues.

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, a treasured and nationally protected landscape and the internationally renowned RSPB Minsmere nature reserve.

We believe that a twin reactor project at Sizewell cannot be realised in a manner which is safe over the timescales envisaged between construction and final decommissioning. We do not agree that the proposed development would not 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. The proposed development, from the start of construction and during operation would result in irreparable damage to the East Suffolk visitor economy.

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 *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 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.

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 fully evidence that the proposed campus would result in no unacceptable harm to local communities and residential amenity?*** We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

Borrow Pits and Spoil Management

This aspect of the development is unacceptable due to its proximity to Eastbridge and several individual residential properties and in any other normal circumstances would not be granted planning permission so near to where people live and because of its environmental implications. Both of these components of the proposed development would have significant and adverse impacts on local communities and

we believe that they do not satisfy policies MP3 and GP4 of the Suffolk Minerals and Waste Local Plan. The proposals do not adequately assess or satisfactorily mitigate any potentially significant adverse impacts. ***Is the applicant able to fully 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?*** We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

Transport

The East Suffolk transport network is inadequate to cope with a development of the scale proposed. The application proposes inadequate mitigation. The 'early years' traffic will adversely impact communities, in particular Yoxford and those along the B1122, as well as the flourishing visitor economy. Other minor roads in the region/area (including the A1120, B1125, B1119, B1121, B1094 and B1069) would be similarly adversely impacted.

The proposed route of the Sizewell Link Road is unacceptable and would provide no legacy. 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 Link Road construction traffic.

During the Issue Specific Hearings the applicant described the proposed Sizewell Link Road as a 'haul road', available to remove the surplus balance of the construction cut and fill material to the construction site. This would seem to offer a reason for the chosen route and the delay in the construction and completion of the new link road.

Is the applicant able to fully 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 sustainability, 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. We believe transport issues contribute to an overriding argument that approval of the DCO should not be recommended to the Secretary of State.

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

We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

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 fully evidence that the proposed development would not result in unacceptable damage to the East Suffolk built heritage?*** We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

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 misalignment of submission of Environmental Permits applications, the Nuclear Site License application and the DCO application. ***Is the applicant able to fully evidence that the proposed development would not result in extensive and irreparable long term damage to the East Suffolk environment?***

We also strongly support the arguments of the Environment Agency, Natural England, RSPB, Suffolk Wildlife Trust, the AONB Partnership, the two Councils and many others that the proposed development would have a catastrophic and very damaging impact on the natural environment, in particular the Minsmere and Walberswick Heaths and Marshes Special Area of Conservation and Site of Special Scientific Interest. Minsmere has remained of international importance to nature conservation since WW2 it has helped to establish the UK in the world of conservation and is becoming increasingly important in a country where the natural environment is being rapidly undermined by human activities. Moreover, the reputation of the UK as a community that values the natural environment would be further undermined should the proposed development be permitted; more so in the

year of UN Climate Change Conference COP 26. This argument is evidenced by Prince Philip's statement in 1977 in the book, 'Minsmere, Portrait of a Bird Reserve'

We may be a bit disappointed with Britain's Industrial and economic achievements but we certainly lead the world in the conservation of wildlife. Minsmere under the guidance of the author of this book [Herbert Axell and Eric Hosking] has made quite an exceptional contribution to the development of new techniques in the management of bird reserves.

Forward by HRH The Prince Philip, Duke of Edinburgh KG KT in 'Minsmere, Portrait of a Bird Reserve'

And more recently by Simon Barnes, author and journalist, personal view about today's threat to Minsmere in 2020 https://tasizewellc.org.uk/wp-content/uploads/2020/11/Simon_Barnes_speech_to_Suffolk_seminar18999.pdf

.....Even if this was just an ordinary nature reserve – even if this was just another patch of staggering natural beauty thronged with some of the most marvellous creatures that live on the earth – I would wish to see it looked after, taken care of, cherished, its future turned into a certainty. But this is Minsmere, which is one of the greatest treasures we have in the entire country, for reasons of the great history I have just in part recounting, for reasons of its incomparable present, and because its future – if it has a future – will bring still more wonders.....

I mean, this is Minsmere. This is the Taj Mahal, the Crown Jewels, the Mona Lisa. If there was even the slightest possibility that any human action could cause any one of these even temporary – let alone irreparable damage – we would do anything in our power to prevent it. Minsmere is no less a treasure than these.

Simon Barnes – concerns of Sizewell C for local wildlife: a personal view

We believe that these environmental issues contribute to an overriding argument that approval of the DCO should not be recommended to the Secretary of State.

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 fully 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?*** We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

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. The applicant 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. The

applicant 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?*** We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

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? We believe that these issues contribute to the strong argument that approval of the DCO should not be recommended to the Secretary of State.

Draft Development Consent Order

We do not have the technical expertise to adequately review and question to applicant's Draft DCO and need to rely the expertise of others (the Examining Authority, Suffolk County Council and East Suffolk Council to scrutinise the applicants proposals on our behalf; and to ensure that communities remain intact and protected should the DCO receive approval.

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).

East Suffolk Council has questioned this and in its Relevant Representation says that:

"There is an issue of uncertainty in the assessments which must be addressed. Sizewell C 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 Sizewell C 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 anxious that the proposed Draft DCO is carefully scrutinised by others, including the Examining Authority, in particular because of its many effects on local communities most impacted by the form of the proposed development.

As an example of local impact in Eastbridge the parameters approach could result in the proposed Accommodation Campus being comprised of 3 and 4 storey flats up to 36m high. The nearest part of the campus to Eastbridge would be a decked car park for 1300 vehicles up to 20m high. The proposed borrow pits, just 400m from Eastbridge could result in storage of materials up to 20m high. And the temporary spoil management areas located 800m from Eastbridge could be up to 50m high.

The multiple adverse effects of the proposal, the sensitivity of the location, and the inadequacy of the mitigation proposals have been questioned by many, including from the public sector. 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 very tightly drawn in the interests of communities, not just in the interests of flexibility for the applicant for the period of construction. Flexibility needs to be limited. The design of the project needs to be the subject of far better controls by the Local Planning Authority, and the public sector generally to ensure that the proposed development is the least harmful achievable.

We argue that the Main Development Site parameter plans are too flexible to secure a development that minimises impacts on communities and the environment, in particular the way that they cover the following elements:

- SSSI crossing
- Beach landing facility
- Soft coastal defence feature
- Hard coastal defence feature
- National Grid pylon and associated infrastructure
- Accommodation Campus
- Borrow Pits and Spoil Management
- Defence to proceedings in respect of statutory nuisance
- Discharge of water
- Protective work to buildings
- Felling or lopping of trees and removal of hedgerows
- Sizewell link road
- Procedure for approvals, consents and appeals
- Miscellaneous Controls
- Vertical limits of deviation

Should the development proceed we agree with the Examining Authority'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 draft DCO Requirements.
- The explanatory memorandum.

In more detail the DCO must ensure that the matters covered in the 'Initial Assessment of Principal Issues' are adequately covered by the applicant and in the draft DCO. The Examining Authority must have regard to all important and relevant matters during the Examination and when it writes its Recommendation Report to the Secretary of State. 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. They are listed below.

Air Quality

The applicant's approach to 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.

Flood risk, ground water, surface water :

- Effectiveness of Flood Risk Assessments for the main development site and 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:

- 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?

Noise and vibration:

- 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.

Robert, Helen and Colin Flindall

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23rd July 2021