

## **.“Transport, health and other matters”**

### **- written representation by Frances Crowe to the Planning Inspectorate in respect of the DCO for Sizewell C, June 2021.**

This paper is Paper 3 of 6, submitted as part of the written submission for Deadline 2 by Frances Crowe. A written representation summary of all my submissions for Deadline 2 will be separately submitted.

I am a resident of Sudbourne. I have lived here with my family since 2001 (20 years), previously holidaying frequently in the area. My written representation includes detailed papers on air pollution (*‘Air pollution [tropospheric ozone and particulates PM2.5]’*) and coastal erosion (*‘Coastal erosion at Thorpeness and lessons for the Sizewell C Project’*). I am also submitting three very short papers on radioactive emissions, water discharges and diesel generators, which were also submitted to the Environment Agency in September 2020. All six papers will be submitted separately for Deadline 2.

All issues were referred to in my relevant representation.

A transcript of my oral representation (presented on 18<sup>th</sup> May, 2021) has been separately submitted.

As this paper exceeds 1500 words, a brief summary of content is also included here.

#### **Summary of content**

This paper covers a diverse range of topics that I have not covered in issue-specific papers. Please note I have purposely not attempted to comment on issues impacting biodiversity and loss of protected habitats; finances; economics; climate change/carbon footprint, sea defences and marine pollution - subjects which I feel very strongly about but on which I know other individuals and organisations will be submitting extensive written representations, which I fully support and endorse.

The topics I cover here are as follows:

1. Road traffic delays
2. Health
3. Legacy to future generations
4. Personal risk
5. Well-being and benefits to the community
6. Communication and complaints handling (if given DCO approval)
7. Quality of consultation
8. Misleading information from the applicant

9. Website content (applicant's own website)
10. Open floor hearings
11. Endorsement of other oral and written submissions

## **1. Road traffic delays**

Regardless of whether the revised freight strategy (January 2021) proves to be deliverable, I am really concerned about the traffic impacts in the whole east Suffolk region. Where I live in Sudbourne we are highly dependent on just two roads to go anywhere outside our peninsular: (i) the B1084 to the A1152, across the level crossing at Melton, and up to the A12 to travel south or east and (ii) the B1069 to Snape crossroads onto the A1094, either turning right onto that road to travel east or turning left to access the A12 at Friday St to travel north. All of these junctions are already bottlenecks, at times incredibly congested and unpredictable. They are especially impacted by school journeys, Snape Maltings traffic, cyclists, trains, holiday traffic and any kind of agricultural vehicles (which tend to be larger than is safe for two-way traffic on these roads). Yet we are dependent on them to carry out every aspect of our lives because our peninsular is very rural in nature with very few facilities: to go food shopping, to visit our local towns, to go to secondary school, college or work, to catch a train, to go to the dentist, optician or hairdresser, to visit friends and family, to visit the beach etc.

The road network in this rural region is unusually sparse with a resulting overriding dependence on a few key roads, and especially the A12. Increased traffic on the A12 cannot help but cause huge delays in the roads trying to gain access to and across it. Alternative routes in event of accidents or road closures are long detours often down single track roads where passing, even for small cars, can be very troublesome and relies on finding passing places (eg Sheepdrift Road and Bridge Road to Ufford; Langham road via Blaxhall to Farnham or Friday Street).

It defies belief that the applicant believes that traffic impacts will be 'imperceptible', especially when the cumulative effects of other potential projects in the area (8 in total for energy alone) are taken into account.

The applicant claims to have undertaken analysis of the impact on journey times to and from Ipswich hospital, for example (9.1 Relevant Representation Report, PINs ref EN010012, May 2021). They calculate the following impacts: northbound 62 seconds between 08:00-09:00 and for all other hours less than 36 seconds; southbound 0-28 seconds; in summary, 'imperceptible to drivers' with no material difference in combined impacts over a day. This totally lacks any credibility for anyone with any experience of utilising local roads, and it certainly cannot take realistic account of the cumulative impact of other projects. The famous statistician George Box said 'all models are wrong but some are useful'. This model is self-evidently not only hugely wrong, it is, additionally, dangerously misleading.

Realistic and thorough analysis must be undertaken to properly assess the impact on residents, workers and services in the *entire* east Suffolk area, including to and from the

peninsular where I reside, which I know from my 20 years' experience of driving in this area will be severely impacted. This must also be seasonally evaluated for the holiday periods when traffic increases significantly and there are many more cyclists using the roads. A single tractor or a group of cyclists frequently leads to delays of at least 5-10 mins. Traffic congestion impacts *everyone* locally - adversely affecting well-being, increasing air pollution and adding cost to businesses.

This week at midday on a bank holiday Monday, we and friends had separate personal experience of traffic being gridlocked at Snape and on the A12. We know that this is likely to be our daily experience once the country comes out of lockdown if SZC construction goes ahead. I anticipate that Melton will be especially bad, as vehicles struggle to get access to the A12, leading to very severe air pollution problems for local residents and especially pupils of Farlingaye High School and Melton Primary School. Air pollution for car occupants will also be unacceptably high if stuck in queues of idling traffic for lengthy periods. When taking our son to the train station on Friday 6<sup>th</sup> April (middle of the day, not rush hour), we encountered significant unaccountable delays in traffic driving westbound through Melton, taking more than 15 minutes just to be able to exit from the station. This is typical of our experience of key roads in this area. The addition of thousands of cars, vans, buses and, worst of all, HGVs to local roads, and especially the A12, will without doubt have major consequences for us all.

Delays to emergency services would be potentially life-threatening as journey times to hospital in Suffolk are already amongst the longest in the country. It is therefore a genuine and justifiable fear that any congestion on our roads - let alone gridlock due to construction works, extra wide loads or accidents - will lead to significantly higher journey times which could prove fatal. I personally had experience of an ambulance being called to my house and then having to be taken to A&E at Ipswich hospital in an emergency last May. Luckily the ambulance arrived quickly and my journey went well (it was a Sunday in the middle of a lockdown) but if this happens in the future it will be a very different story, leading to severe consequences for patients and perhaps insurmountable difficulties for staff.

I believe children will also be particular victims of this congestion. Children in this area already have really long journeys to school. Often there are no school buses and parents have no choice but to take their children by car, sometime to more than one school. For children to take part in any kind of activities (sport, music, theatre etc) even longer journeys are often involved. We literally had to travel for an hour by car (each way) to enable our son to play cricket. Even football matches could involve journeys of up to an hour each way. Our daughter gave up swimming because the journey times to the weekly events were too long. Moreover, school catchments in this rural area are very large and children's friends can live long distances away. Any increases in traffic could significantly curtail children's ability to see friends and take part in activities if parents are unable to spend additional time driving their children. The lives of working parents will be made extremely difficult, if not impossible, and the quality of children's and families' lives will be significantly impaired by the necessity of spending even larger amounts of time travelling in vehicles just to do the necessary things in life of going to work, attending school and doing the shopping. This also has health impacts as pollution in vehicles caught in congestion is likely to be high. The

impact on children of air pollution is particularly damaging, especially as the SZC construction period could span their entire childhood.

In summary, the roads in this region are totally unsuitable for the transportation of millions of tonnes of materials to Sizewell. The alternative modes of transport are far from secured and will still rely on vast numbers of vehicles coming on an inadequate rural and at times very overstretched road network. Furthermore, road improvements will not be done in advance of the works. These factors, together with the cumulative impacts of other projects (for instance, Scottish Power windfarm projects), should make this proposal a complete non-starter. It is the wrong project in the wrong place.

## **2. Health**

I have already drawn attention to my serious concern about the impact that this development would have on provision of emergency services.

I am concerned too at the impacts that Sizewell C and increased workforce in this area would have on all aspects of healthcare, including dentistry for which I currently have to wait months for an appointment. But in particular I am concerned about the provision of secondary care (Ipswich hospital is already operating to full capacity) and tertiary care, for which the provision is already poor in this region due to lack of local specialists and provision at, for example, Cambridge, being incredibly stretched. An increased population, even if only for 10 years, will need healthcare but this should not be at the expense of local people when waiting times are already very high due to delays following the pandemic. Increased provision must be made available.

Additionally, no account has been taken of the increased risk of pandemics, resulting from a huge influx of workers, living/working/socialising/travelling in close proximity. Devastating potential impact on businesses and local could arise from:

- increased risk of local lockdowns
- heightened risk of infection
- overwhelming pressure on emergency services and hospital facilities
- severe knock-on effect to anyone suffering from ill-health for any reason, as hospitals are overwhelmed by waiting list backlogs.

## **3. Legacy to future generations**

In my oral statement at the open floor hearings I focussed on the impact of Sizewell C would have on future generations, especially the legacy of nuclear waste stored for over 100 years on a highly vulnerable and fast eroding coastline. My concerns and evidence regarding the erosion is outlined in my paper 'XXXXXXXX, YYYY', also submitted as written evidence for Deadline 2.

However, I want to mention specifically here that I think there is a very low awareness among the local population regarding the quantities of nuclear waste that will be stored at Sizewell and for how long - or even that there is any waste stored there at all. I have spoken to many people and most believe it is buried elsewhere and certainly have no idea of the quantities that are proposed for this site. I have scoured EDF's website for any mention of nuclear waste storage at Sizewell and can find nothing - clearly this is not something that EDF are keen for local communities to be aware of.

I strongly believe that the application for nuclear waste storage should be a separate application given the length of time and quantities involved, which can be properly consulted on in its own right, just as Cumbrian communities were given the opportunity to decide whether there would be a Geological storage Facility there. I agree with relevant representations which maintain that the waste store and spent fuel store, together with associated facilities, should be considered as standalone non-NSIP developments and should not be granted permission under the DCO. I agree that the Section 56 Public Notice was misleading and inadequate, as it failed to inform the public of proposed on-site storage of highly radioactive waste.

This is absolutely no place for two more reactors and their associated waste. I am wholeheartedly in favour of genuinely green energy. But nuclear is not this. The legacy of climate change to our children is bad enough without also leaving a legacy of nuclear waste here which they may not have capacity to keep safe.

Whatever one's views on nuclear power, this is absolutely no place to store nuclear waste for over a hundred years on perhaps Europe's fastest eroding coast. To propose this in the light of what we know (and do not know) about climate change demonstrates arrogance and hubris in the extreme. This would leave a terrible legacy to future generations who will reap NO benefit at all, just billions in costs and the potential loss of everything we and they value.

#### **4. Personal risk**

I am really concerned that my house and business are both based here in east Suffolk. I have always been cautious in my approach to risk and would never allow my home or business to not be adequately insured. And yet it appears that simply to live in east Suffolk, given the scale of nuclear construction that is planned here on our eroding coast, is an imprudent step to take. It is universally the case that any claims relating to incidents arising from a nuclear facility are specifically excluded from everyone's insurance policies by insurers. Why is that? We did not choose to have this risky development on this extremely vulnerable site.

Despite our concerns, we are told that nuclear energy is safe and clean. If this is the case, the applicant should underwrite the insurance of all of our homes and businesses and guarantee compensation for any loss of income and health - or, indeed, death - should any incident occur. Instead, we the local residents, who may have this white elephant foisted upon us against our wishes, will be left to carry the can and UK taxpayers will be left to pick up the astronomical costs, should anything go wrong. This seems more than a possibility given

EDF's appalling track record of delivery for EPR reactors to date. Even at their flagship site, the construction has been riddled with errors and delays. I fear that the imperative for the applicant to deliver the twin reactors at Sizewell at significantly lower costs than managed before (despite being on a much trickier, smaller site, surrounded by protected habitats) due to EDF's parlous financial state will bring additional risk of errors and potential accidents at this site. We all know what happened at Chernobyl as a result of the undue pressure for savings and speedy results.

## **5. Well-being and benefits to the community**

The applicant summarised the benefits to the community in their response to relevant representations (EN010012): A bypass, a link road in a disputed location, a few sports facilities (when the workers are not using them) and a community fund (how much and for what?) - alongside a transfer of jobs from tourism to temporary construction. These measures will do absolutely nothing to improve my well-being or enhance my quality of life which will be so badly threatened by this project. The applicant's response and understanding of our way of life in the region is risible.

## **6. Communication and complaints handling (if given DCO approval)**

Measures for communication of works and impact on the public (including cumulative impact of multiple infrastructure projects in region), if similar to those operational at Hinkley Point, are very inadequate, as is the proposed system for complaints monitoring, analysis and remediation.

I cannot find any information on EDF's Hinkley Point website which gives regularly updated current and advance information as to any works impacting communities, for example, movement of a large load. Queries using the form on the website are answered within 10 working days - I find this totally unsatisfactory.

Furthermore, complaints have a similarly long response time and necessitate choosing a multiple choice option that may not reflect the nature of your complaint. This is the message I received to my complaint today (note the use of the words 'enquiry' and 'interest' - does this sound like the response of a company who will treat complaints seriously?):

"Thank you for your enquiry. We will respond to you as promptly as we can and certainly within 10 working days. Thank you for your interest in the Hinkley Point C Project."

I totally lack confidence that EDF would keep residents properly and fully informed of events that could cause any disruption to residents and visitors, or that they would act promptly and effectively on complaints, even if serious, and assess and report cumulative impacts promptly and effectively (ie in real time).

Additionally, I am not satisfied that sufficient measures will be put in place to monitor their contractors' compliance. If given planning consent, I believe that EDF will hide behind a wall

of bureaucracy and obfuscation that will make it impossible for them to be held promptly accountable (if at all) or for residents to know whether the disruption or pollution they are suffering is an isolated or widespread incident. There should be transparent and immediate reporting and analysis - available for all to see - of all complaints and the action taken or proposed.

## **7. Quality of consultation**

My experience of EDF's engagement at all consultations was, like for so many other people, extremely poor. I found the display materials and maps not to be as helpful as they could be (my background is in marketing and I know these I could have made these hugely more informative and clearly presented). But, worse, the attitude of EDF staff left so much to be desired.

There are three specific occasions I want to draw to your attention:

- At the 3<sup>rd</sup> consultation at Leiston on 5<sup>th</sup> January, 2019, the EDF manager turned off the lights of the hall at exactly 5pm despite having a hall full of people with many unfinished conversations happening. No warning was given and we were simply plunged into darkness. The staff clearly could not wait to be finished with the event and to get away. Many businesses seek to close an event or venue at a given time but I have never been treated in this disparaging and discourteous way anywhere, let alone at a public consultation.
- At the 4<sup>th</sup> consultation at Wickham Market on 25<sup>th</sup> July, 2019, I asked the group of EDF staff who greeted visitors at the entrance to the hall what were the main changes since the previous consultation 6 months before as we had had no feedback. They were completely unable to give any answer at all - and there was no information at the exhibition giving any detail on the outcomes from the previous consultation. (see more on this below).

Once in the hall I had some specific questions that the person I was talking to was unable to answer. They offered to find someone to talk to me about it. I was kept waiting for more than 10 minutes even though there was a circle of EDF management in the hall simply conversing with themselves and totally ignoring visitors. In the end I had to interrupt the circle to ask someone to talk with me, which they did reluctantly and with ill grace. I was extremely unimpressed.

- The much-vaunted mobile library with the DCO documents was also little more than a tick box exercise. My partner and I had to do a return trip of 24 miles to Woodbridge on Friday 7<sup>th</sup> August, 2019 - the only date/location we could visit the van, the list of venues/dates being extremely limited. There was a heatwave on the day yet there was no shade available outside and the library was sited on the edge of a busy road, hardly conducive to the extensive study of documentation. (I did not want to spend a long time sat inside the van because of Covid concerns.) Whilst the woman (Rea?) working in the library was very helpful, she was occupied helping my partner whose queries were different to mine. By contrast, the attitude of the manager, Simon Hazelgrove, was

extremely abrasive and resentful, indeed rude. Although we were the only people there, my request for information and an explanation of how the data was organised was dismissed because he had, he said, many other things to do. I was genuinely shocked by his attitude as we had gone there to learn and I was overwhelmed by the sheer quantity of files and needed guidance. I did not expect such hostility which is totally at odds with the ethos of 'excellence' and 'improving people's lives' that Spring promote on their website. They claim 'if we work on community projects we listen, consider the wider good, ensure access for all, and plan positive long-term outcomes'. This was definitely not my experience. Moreover, Simon Hazelgrove also misinformed us by stating that the mobile library was funded by the Planning Inspectorate and nothing to do with EDF. On their website, Spring clearly state that EDF is one of their major clients.

Inspectors heard at the open floor hearings how frustrated and angry the community are with EDF's attitude and lack of proper engagement. I endorse the view of many that the consultations have been treated as a tick box exercise by EDF rather than being undertaken in pursuit of genuine engagement with the community.

Furthermore, I find it completely inexplicable that there was no reporting at any stage giving a summary of the feedback that EDF received from each consultation, and the action or changes they made as a result, or the reason the concerns could not be addressed. This is the absolute least one would expect from a consultation on a development of this complexity, magnitude and impact where local people had clearly invested a considerable amount of time in multiple consultations over many years but still had many unaddressed concerns.

I also want to comment on the information on EDF's own project website. I was having difficulty accessing the documents I wanted on the planning portal (searches are not fruitful if you do not know the terminology that the applicant has used) so I decided to go to their own website instead (<https://sizewellcdco.co.uk/>). Unbelievably this only has the original DCO submission made in May 2020 and no subsequent amendments. They helpfully suggest visiting the planning inspectorate website for these. I spent over an hour trying to find the document I was looking for. The changes the applicant made to their application were considerable and yet they cannot even be bothered to put them on their own website. Their efforts to keep the community properly informed are derisory.

## **8. Misleading information from the applicant**

The quality of EDF's communications leave so much to be desired. Their documents, literature and advertising are full of half-truths and greenwashing. Others have commented on their advertising and community leaflets. I will concentrate here on their recent comments on relevant representations (EN010012, May 2021) and on claims on their website.



Comments on relevant representations (EN010012):

- They repeatedly use the flippant and dismissive phrase: [the applicant] 'recognises that there will be residual, *intangible* effects on communities which may result in *perceptions* of a reduction in quality of life' (my italics). This arrogant dismissal of local concerns is completely insulting to local people across the whole east Suffolk area (particularly those of Theberton and Eastbridge who will suffer the most), who know otherwise and from whom you have already heard extensive evidence of the massive disruption this project would bring to their lives. This is absolutely typical of the attitude of EDF to local communities. Turning their back on community concerns simply permeates their entire corporate culture.
- The applicant also states: 'The proposals at each stage of consultation were informed by previous feedback. SZC Co.'s commitment to listening and acting did not end with submission of the Application. The accepted changes (April 2021) were made in response to helpful feedback on issues such as transport, severance and the environment. Feedback from the consultation helped inform the proposals in the change request'. Yet they had received this feedback at each stage of the consultation over a number of years, and yet continually failed to respond to it and, incredibly, just one week after the submission of everyone's relevant representations, chose to move the goalposts. It seems that the applicant is using its experience of the planning process with Hinkley Point to game-play now for maximum benefit to themselves and maximum disruption, confusion and inconvenience to the local community. I know many, many people - friends, neighbours and family - who have disengaged from the planning process because they cannot cope with its complexity and EDF's obfuscation and undermining tactics. We are totally exhausted by EDF's obstructiveness and wilful half-truths but those who can (mostly those who no longer have the burden of full-time jobs or young children) will continue to do our best, despite the difficulties placed in our path at every opportunity, to ensure that the truth is known and that this application is dismissed.
- Additionally the applicant states: 'the region also *has a clear need* for the economic benefits that the proposals would bring' (my italics). This is a complete misrepresentation of the truth. We have a thriving and growing tourism sector and employment here is good compared to other regions. I, like many other people and businesses who have given evidence, believe that the project would have a huge net detrimental effect, destroying our tourism industry and the quality of life associated with it, whilst making it much more difficult to get services locally that we rely on (electricians, plumbers, builders, cleaners etc etc). I have recently had 15 months of remediation works done on my house following a catastrophic contractor error here. All of the contractors who have worked here (Suffolk, Essex and Cambridgeshire based and working across East Anglia) have told me that they are experiencing huge difficulties recruiting and retaining quality staff. I have heard similar accounts from local cleaning/housekeeping businesses (I co-own a holiday let business and our cleaners have just resigned because they cannot recruit the staff they need), builders and fencing/garden contractors, to name but a few. All the anecdotal evidence points to a

potential (and probably current) crisis of workforce and skills in the local area which will become very detrimental to local residents, businesses and tourism if Sizewell C goes ahead.

## **9. Website communication (applicant's own website)**

This is full of misleading information and half-truths. For example, the information presented about SZC and fish <https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/news-views/sizewell-c-fish> defies belief. It completely ignores the fact that so many smaller forms of marine life - including fish eggs and fry - will be destroyed by the cooling plants. Furthermore, EDF's claims that the development on SZC 'will boost local biodiversity by 19%' is again ridiculous and highly misleading. <https://edition.pagesuite-professional.co.uk/html5/reader/production/default.aspx?pubname=&edid=a487172a-9953-49f3-8d4b-e92d81a83ef3>.

I will not reiterate the many excellent submissions that inspectors have already received on this subject but it is an outrageous example of the greenwash that EDG apply to all that they claim and disseminate.

Similarly, they make claims that 'we cannot address climate change without nuclear power'. Again, this is a false and misleading claim, flying in the face of the acknowledged urgency to address climate change well before Sizewell C has any possibility of being up and running. Even assuming if it were to go to plan if approved (highly unlikely since EDF have failed to achieve this with their EPR reactor at any other site with their flagship Flamanville site more than a decade behind schedule), the massive amounts of carbon used in production cannot hope to be repaid until 2040 and beyond - much too late to deal with the climate crisis we are facing.

I draw attention to just a handful of these very public and high profile untruths and misrepresentations of the facts as I think they are indicative of EDF's flexible approach to the truth: what the applicant presents in the DCO and the promises they make cannot be trusted.

## **10. Open floor hearings**

I was genuinely moved by the excellent and thoroughly researched evidence - and heart-breaking personal accounts - that were presented to Inspectors at the Open Floor Hearings. However, I find it inexplicable that the applicant's participation was so cursory and lightweight. Again, it felt like the applicant was paying lip service to the process rather than really listening and seeking to learn from and respond to the process.

The absence of statutory consultees, for example the Environment Agency, Natural England and the MMO, was also surprising and concerning. Is this lack of engagement normal for a

project of this size and complexity or is it a symptom of the burden these organisations are already under and their inability (as they have already stated in correspondence to the Inspectorate) to deal with the excessive workload and timing of this application? I want to register my great concern as to whether the applicant's proposals will be interrogated in the diligent and detailed way that they should be by these expert agencies, given the pressures they are working under and their already expressed difficulties in managing the additional workload at this time.

## **11. Endorsement of other oral and written submissions**

It is impossible to know where to stop in my written representation as everywhere I examine what the applicant presents, I find more unresolved issues, concerns and obfuscation of the truth. However, I will finish by endorsing the excellent submissions made by so many people and organisations at the open floor hearings and the written submissions of, in particular, Stop Sizewell C, TASC, the Minsmere Levels Group, the RSPB, Suffolk Coastal Friends of the Earth, the Alde & Ore Association/Alison Andrews and Suffolk Wildlife Trust.

I add that I absolutely cannot endorse the submission of East Suffolk Council who are elected and appointed to represent local people but are completely failing to defend their constituents' interests adequately on this issue. What we stand to lose cannot be mitigated for. Moreover, I absolutely refute the extraordinary suggestion of Craig Rivett, representing East Suffolk council at the Open Floor Hearings on 18<sup>th</sup> May, that a new 'different' type of tourism is possible - I am aware of no tourism built around wholesale coastal (and hinterland) industrialisation, traffic congestion, pollution and desecration of precious wildlife habitats.

Frances Crowe  
2/6/21