

Your Ref: EN010012 BY EMAIL

My Ref: 20025463

4th August 2021

Dear Sirs

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project DEADLINE 8 STATEMENT ON SPECIFIC ENVIRONMENTAL ISSUES 24th SEPTEMBER 2021

As resident of the historic coastal town and cultural centre of Aldeburgh, I registered my grave concern over this DCO application for the construction of two further nuclear reactors at Sizewell. I have a personal interest in encouraging public engagement in and care for the character of the town and its surroundings, and the preservation, development and improvement of general public amenity in the area. The proposals conflict with the fulfilment of these interests.

I am not opposed to nuclear power, and I wholeheartedly support the Government's net zero target for energy production. However, I view with great concern the damage to the Suffolk Heritage Coast which the construction of this very large-scale project would entail.

Sizewell enjoys a unique location, sandwiched between the two small and very special historic coastal towns of Aldeburgh and Southwold, and adjacent to the internationally renowned RSPB Minsmere bird sanctuary and nature reserve, and the National Trust's Dunwich Heath clifftop estate.

This whole coastline is part of one of England's 23 Areas of Outstanding Natural Beauty, so designated in 1970 with the purpose of conserving and enhancing the habitats and biodiversity of the special heathlands, woodland, estuaries and coast. Large-scale development here would conflict totally with the Government's stated intention to add provisions to the Environment Bill currently before Parliament to ensure that new nationally significant infrastructure projects in England, such as future transport and energy projects, will provide net gains for nature. The simple truth is that if there were no existing nuclear power station on this part of the coastline, a proposal to develop one here now would be totally unthinkable in today's heightened awareness of environmental issues.

The Government's previous designation of the Sizewell site and its more recent announcement that it proposes to go ahead with nuclear power station development generally mean that the greatest care must be taken in examining the full implications of

this DCO application. This Examination is inevitably complicated by the recently completed Examination of the DCO applications by SPR for two offshore windfarms, which would involve major substation development in the same area of rural Suffolk to link the power generated offshore to the national grid and potentially provide connections for numerous other offshore projects. I am aware that The Aldeburgh Society, Aldeburgh Town Council and The Aldeburgh Business Association, together with many other local organisations, have contributed to the Planning Inspectorate's examination of those projects and have emphasised that the cumulative impact of all these major energy proposals would be too hard for this fragile area to bear.

The impact of EDF's proposals upon the town of Aldeburgh would be extremely damaging. Both the prospective industrialisation of the area to the north of Aldeburgh and the process of construction of these facilities risk damaging the whole economy and social fabric of the town. Aldeburgh relies heavily upon visitors for the vitality of its High Street. A recent study estimated there to have been over four million trips per year to the area, creating a spend in excess of £160 million (Source: The Energy Coast report of September 2019: The-Energy-Coast-BVA-BDRC-Final Report-2019.pdf). Visitors come not only for the attractions of the beach, they include numerous bird watchers and walkers, and others pursuing a wide variety of interests, not only in the summer peak but at nearly all times of the year. The world-class music venue of Snape Maltings attracts many visitors with world-class artistes performing concerts throughout the year and provides a major centre for the development of young professional musicians. Two yacht clubs and a notable golf course also attract many visitors. The (recently upgraded) Moot Hall Museum and the Red House (long-term home and archive of Benjamin Britten and Peter Pears) are also important destinations for visitors.

In research for the preparation of the Aldeburgh Town Plan 2015 visitors cited the beach and sea, the town's special atmosphere, the character of the High Street, and the quality of the surrounding countryside as the major reasons for their visits. The value of peace and quiet, dark skies, and a desire for minimal change, featured highly in responses. Residents, a significant proportion of whom moved to the town in retirement, prize these features very highly too. All of these aspects are fundamentally threatened by EDF's proposals, causing concern that the rest of many residents' lives would be scarred by construction noise, dust, vibration, light pollution, traffic congestion, and social disruption.

The traffic impact is particularly troubling. Whilst road access to the development site is not intended to impact directly on Aldeburgh, the fact that a significant share of the very large volumes of construction materials required for a project of this size would be delivered over a rural roads system some distance away from major traffic routes would inevitably cause widespread congestion. The operation of the construction site would also generate a notable increase in staff bus, car and van traffic throughout the surrounding area, causing delays, parking problems and general frustration. We understand that all these issues have been observed at the Hinckley Point site, even though this is much closer to main traffic arteries. These problems would inevitably impact upon prospective visitors, who would cease to see Aldeburgh as a desirable destination.

The applicant's claim that the construction and operation of Sizewell C would create important local employment opportunities also raises doubts. This relatively sparsely populated area is fortunate in having relatively low unemployment, which suggests that the promised creation of new, probably higher paid jobs would attract people away from their existing employment in local businesses such as the hospitality trades, which are already suffering from the loss of job-seekers from EU countries.

For the construction phase, EDF envisages that a significant number of professional and skilled workers would move on from their existing jobs at Hinckley Point C, requiring them to set up home in East Suffolk. Accommodation for longer-term rental is in short supply in the vicinity of Sizewell, and short-term rentals of holiday homes and apartments make up a significant share of the visitor accommodation available in Aldeburgh. These properties are unlikely to become available for Sizewell workers since the accommodation is required by visitors for most of the year, at much higher rents than long-term rental properties, and not just for the summer season.

The proposed accommodation campus at Sizewell also causes us concern. The projected numbers of workers lodging at the peak there would exceed the total population of Leiston, the nearest town, and would be more than double that of Aldeburgh. While on-site health facilities and social welfare provisions are envisaged, these workers would surely also wish to spend some recreation time off-site but would find very limited shopping and entertainment options in the vicinity. They would be unlikely to spend much time and money in the type of shops which visitors on holiday like to visit, and only a minority would be likely to be satisfied by the offerings of our small local cinemas, Snape Maltings and the Jubilee Hall. Moreover, any workers requiring urgent hospital treatment would face a minimum half-hour transfer to Ipswich Hospital (where there are no plans to upgrade facilities to cope with increased demand).

This set of circumstances is already unfavourable enough for the construction process without the fact that the project itself is fatally flawed. It is based on a concept drawn up more than ten years ago, before other forms of renewable energy generation became viable and so was designed for circumstances which are now very different. I am not opposed to nuclear power, but this project is too large for our eroding Suffolk coast to bear and it is beset with unresolved issues such as the handling of dangerous wastes and damaging impacts upon sensitive environments both onshore and offshore.

This plan cuts the AONB in half and could gravely affect its geography. It's a fragile coast, with periodic cliff collapses and considerable movement of sand and shingle. The proposed sea wall reinforcement and the beach landing facility at Sizewell might have a damaging impact upon the coast at Thorpeness and Aldeburgh, and on the eastern bank of the River Alde as well, which runs parallel to the coast for nine miles. Globally, sea levels are rising due to climate change, and the North Sea is prone to tidal surges, which generate flood events like the famous East Anglia floods in 1953 or the more recent storm surge in 2013, which inundated the whole of the Alde Estuary as far inland as Snape.

These risks are compounded by the risks inherent in nuclear power generation. The devastation of extensive land areas and the displacement of large numbers of residents as a result of nuclear accidents at Three Mile Island, Chernobyl and Fukushima are well documented and cannot be ignored. I recognise that different technologies are envisaged for Sizewell C, but also note that so far no EPR reactors are operating successfully in Europe and projects to build them are being seriously delayed by complex technical difficulties. The end treatment and storage of nuclear waste is also an issue of enduring concern on an eroding coastline. The fact that there are already two existing nuclear power stations here, one being half-heartedly decommissioned and the other scheduled to continue in operation for another 15 years, cannot be taken to justify tripling the presence of these known risks.

In short, this is the wrong project, in the wrong place. The future of energy generation should lie in wind, solar and tidal power, together with the option for the smaller-scale nuclear units now being developed, combined with new forms of electricity storage capacity.

Whether or not combined with the cumulative impact of Scottish Power Renewables' proposed onshore installations and numerous additional grid connections, this project would be excessively damaging to our area. It would wreak damage on the natural and built environment. It would harm our inhabitants. It would threaten our businesses. And it would drive away the visitors our economy relies on. Green energy (if indeed it could be called that) cannot be allowed to wreak such seismic trauma in our collective march towards net zero.

Having set down the background and my general comments, I turn now to specific issues which I am marking against those of UNESCO's Sustainable Development Goals which are most relevant to this project:

SDG1: NO POVERTY – The extortionate cost of constructing, not just one but two reactors and all the infrastructure that will go with them, will mean ordinary people being asked to pay much more per KwH for their electricity. The government, accepting that the unit price to the end consumer must be set to project cost to be recovered over the design life of the project, announced a relaxation of the energy price cap. Increased cost of buying power will unfortunately mean more hard working families being put into 'fuel poverty'. Increased costs are inflationary and interest rates tend to track inflation. The cost of borrowing, for example to purchase a property, will increase resulting in families being forced to remain in unsatisfactory accommodation for longer. Children will be the poorer also as their parents/carers will need to work longer hours to help the family budget.

SDG2: ZERO HUNGER – This goal is closely related to SDG1 (above). If the cost of heating and lighting a home increases there has to be corresponding economies made elsewhere, including to food budgets by ordinary people who are struggling to meet the higher costs.

SDG3: GOOD HEALTH AND WELL-BEING – If a family is struggling to meet its financial obligations its health and well-being will suffer. Further the health risks associated with nuclear energy are well known. For centuries after the site stops producing electricity there

will be contamination over a wide area, which could leak and harm the biodiversity, ecology and people's well-being.

SDG4: QUALITY EDUCATION – As mentioned above I am concerned that the promised benefits of apprenticeships for local children of school leaving age will not materialise in anything like the numbers being promoted.

SDG6: CLEAN WATER AND SANITATION – The construction of the project will require vast amounts of potable water which will put a strain on the resource locally. The promoter has recently recognised this and has made a late alteration to its construction plans to provide for a temporary desalination plant to supply its water needs. But this plant will take over 18 months to construct and, during this time, water will be brought to the works by lorry, thus increasing the load on our already stretched road network and beyond what is already a negotiated reduction (by this I refer of course to EDF's earlier amendment whereby more construction traffic was to be sea and rail borne, and less by road). Water is also a precious resource in its own right.

SDG7: AFFORDABLE AND CLEAN ENERGY – I have covered affordability above. Whilst nuclear energy is efficient and, it may be argued clean, at the point of generation, the construction phase will account for much greenhouse gas production which EDF say will be mitigated during the energy production phase. But this is unverified and far too subjective. Further, the site will become more and more contaminated at time passes and the whereabouts of the spent fuel storage facility is questionable. Finally the 'green' credentials fail immediately the site stops producing electricity as it will be many centuries before the site is once again fit for use by the public.

SDG8: **DECENT WORK AND ECONOMIC GROWTH** – Work in the construction of the project is likely to be short term. The project will be broken down into phases and different skills will be needed at each one. There may be a short term economic boost to the area but the longer term threats cannot be quantified. As the project winds down the real economic costs will become known. Additionally the promoter expects its construction workers to live (in the main) in temporary accommodation where all facilities will be provided on site. The potential benefits of having well-paid construction workers in the area, who require to be entertained, is unlikely to be a reality because their money will be spent on site rather in the wider location. And once their part in the construction is over those workers will leave. The completed project will require a relatively small number of permanent staff and other technical staff will be brought in on a contract basis as and when needed.

SDG9: INDUSTRY, INNOVATION AND INFRASTRUCTURE – It is possible that the project will meet the objectives set down in this development goal.

SDG11: SUSTAINABLE CITIES AND COMMUNITIES – 70% of global carbon emissions are produced by cities. Relocating the point of carbon production to less populated locations may result in cities meeting their lower emissions targets, but at the expense of the rural environment.

SDG12: RESPONSIBLE CONSUMPTION AND PRODUCTION – The production of electricity in a way that does long-term harm to the environment is irresponsible and it therefore follows that the consumption of any electricity produced in this way is equally irresponsible.

SDG13: CLIMATE ACTION – A true zero emissions policy should reflect on the whole life of the project and not just the middle (production) phase. A net-zero policy using carbon offsetting is meaningless as it simply transfers the problem or buries it.

SDG14: LIFE BELOW WATER – The ecology in our seas and oceans is a precious resource. The proposal by the promoter to bring most of the construction materials for the project by sea is on one hand to be welcomed as it reduces road use, but the consequences on marine biodiversity has not been adequately addressed. Additionally species on the beach near the water line may also be adversely affected.

SDG15: LIFE ON LAND – Land based ecology is equally fragile. The project is located in one of the country's finest landscapes and is home to animal species, rare birds and aquatic life all of which will be materially and adversely affected by the proposals. Some of this biodiversity may never recover.

The aim of UNESCO in drafting their *goals* is to improve the thought processes that go into development, and each element of the project should be designed with the objectives of their goals at the very heart of the process. If the project (or any part of it) does not meet the goals then, put simply, it should be rejected.

This project fails on so many counts.

I have faith in the integrity of the Planning Inspectorate Examination process and I trust that, despite all the community consultations, and the extensive preparatory works already undertaken, it will conclude that this project is unsustainable and should **not** be recommended for development consent.