



# Together Against Sizewell C

SIZEWELL C PLANNING APPLICATION INQUIRY (IP no. 20026424)

## **DEADLINE 8: ORAL REPRESENTATIONS & COMMENTS REGARDING ISH12 COMMUNITY IMPACTS**

### **2. Community, Amenity and Recreational Impacts**

**(i) Community Safety - Policing of development through construction and operation of the proposed development.**

**(ii) Progress on Community Cohesion and Community Safety identified in the Local Impact Report and Statement of Common Ground.**

**(iii) Timing of provision of accommodation campus, associated health and welfare facilities and caravan park.**

Due to the impact that SZC workers are likely to have on the domestic and holiday rental accommodation, and the knock-on effect on tourism businesses, if accommodation is not available at both the caravan park and accommodation block, it is essential that this accommodation is available before major construction works start, other than at the associated development sites. TASC consider a trigger of 850 workers before the caravan park is ready is not adequate. The Applicant has laboured on their need to get on with the project, so it does not seem unreasonable to expect the caravan park to be installed within a certain timeframe e.g. within 6 months from the start date.

**(iv) Assessment of displacement of visitors and additional visitors to amenity and recreational areas including the AONB**

**(v) Assessment of amenity and recreational effects on the AONB**

Oral presentation made by Chris Wilson on behalf of TASC is included in the following:

“With all the talk about money and funding mitigation provisions, TASC are concerned that we can lose sight of what is important here. Covid-19 and the associated lockdowns have highlighted how important green spaces, open tranquil countryside and just being immersed in nature, are to our physical and mental well-being. This is just as important to those lucky enough to have the AONB on their doorstep as it is for those that travel to the AONB. The stopping up of PROW, the loss of the tranquil coast path, bridleways and footpaths during construction, the thousands of vehicle movements each day, the noise, dust, and air pollution, beach landing facility with overhead conveyor, will all detract from use of and enjoyment from using the AONB and its hinterlands and will therefore negatively impact health and well-being. And people who travel to the AONB from further afield to recharge their batteries will now find insufficient accommodation because it is likely to be full of SZC workers. A few surveys 5/6 years ago conducted by EDF before the full horrors of the SZC development were exposed in the DCO application, don't provide any comfort-we all know questions can be phrased to elicit the response wanted. TASC would like the ExA to bear in mind these unmeasurable impacts when weighing up the pros and cons of this development.”

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Nicola Pilkington then spoke on behalf of TASC “Adding to Chris Wilson’s remarks I mention huge savings to the NHS that tranquil places provide so when you talk of monetary terms and compensation it is really important the Planning Inspectorate take into account that if people exercise, if they recharge, if they come and relax and walk, they are actually saving the NHS massive amounts of money.”

A further oral presentation by Nicola Pilkington on behalf of TASC, included the following:

“At D2, I sent in evidence of a recording by Chris Watson (<https://chriswatson.net/>), made with me on a June evening in 2018 at Eastbridge [REP2-396].

“I hope you will have had a chance to listen to it as you will hear a distant Cuckoo, a tractor cutting hay, a distant car on the Theberton road, Muntjac Deer barking and evening birdsong. In spite of the noise assessments that EDF has embarked on, I believe that all the sounds that were recorded on that June evening will be obliterated once construction begins and people in the area won’t be able to listen to the noisy quietness I witnessed, for over a decade. That is an entire generation of children who won’t be able to learn to identify bird and animal acoustic behaviour in this area of Suffolk, probably one of the best and most important places for listening to avian sound. And what of the impact of noise on the acoustic behaviours of the creatures recorded that evening? How will their behaviour change? Will they leave the area and find new territories? Ecologists won’t be able to answer these questions until they can observe their behaviour in the new noisy environment that is proposed.

“I have not been able to ascertain whether EDF has matched their proposed acceptable noise levels with the background sound that can be heard in the recording. This question is important, and I would ask the ExA most sincerely to listen to background sound with and without noise levels that EDF perceive as reasonable.”

Footnote from Nicola Pilkington:

‘In the Hearing I asked if one of the acoustic experts would listen to the recording and let me know whether we will still be able to hear these types of sounds once construction begins. On behalf of TASC I request an answer.

‘The loss of quietness and the AONB Landscape Quality relating to Tranquillity will have a direct impact on any Health and Wellbeing benefits that make the area special and have the potential to save the NHS money.’

### **3. Potential Adverse effects on Human Health and Living Conditions of Residents through construction and operation**

#### **(i) Night time rail operation**

The oral presentation made by Nicola Pilkington on behalf of TASC is included in the following :-

“What is an acceptable disturbance of reasonable level of noise or vibration that people are supposed to put up with is subjective and will vary from person to person depending on whether they are a deep or light sleeper or somewhere in between?

“However, what is not in doubt are the sleep patterns that move from light sleep to deep sleep and back again, patterns that are linked to the body’s Circadian Rhythms. While someone is asleep and whether the time of the train will move a person from deep to light sleep or wakefulness, is a matter of importance to health professionals as they have been reporting for many years on the serious negative impacts of disrupted night times and there are also reports coming from night shift workers about the long-term impacts of sleeping in the day rather

than night sleep. I shall reference these in my additional written response but will comment that higher rates of Neurological conditions, Diabetes and Heart Disease have been recorded.

“Given these concerns and my searches in volume 3 of the DCO documents, I think it would be useful to know exactly how the Applicant intends to deal with a noise complaint coming from someone living close to the railway line in Woodbridge, Campsea Ash, Saxmundham or Leiston. Before I moved back to Suffolk, I went through the process of a Noise Complaint that was decided in my favour by a Magistrate. Obviously during the long period of Construction, a night train won’t be stopped due to a noise complaint and sleep disruption it may cause. Please tell me what I can expect and how you plan to rectify a complaint. You might have touched on this in volume 3 but the detail is really important. And finally, can I have an answer from East Suffolk Council on whether they will be involved in noise complaints?”

Reference:

Circadian Rhythm Disorders | NHLBI, NIH <https://www.nhlbi.nih.gov/health-topics/circadian-rhythm-disorders>

And the Health Implications of Disrupted Circadian Rhythms  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4632990/?report=reader>

Regarding the Applicant’s response: Ms Pilkington adds:

“I was pleased that Mr Philpott agreed to answer my question relating to making a complaint but dismayed that it will be in writing.

“It is reassuring that Mr Philpott had the support of medical professionals about health risks but I am concerned that in some areas there was going to be a need for closed windows. I stated my concern on this as Public Health England issues advice that, in very hot weather, people who are elderly or/and have various long term medical conditions should stay indoors, close their windows in the day and open them at night. These people will need a sufficient form of ventilation. It is generally agreed that if you shut out noise by double glazing etc you sacrifice much needed ventilation necessary not only for human health but also for older or listed houses. Air conditioners are only a suitable short-term solution and the offer of earplugs as suggested in Hinkley only suitable for short-term solutions.”

**(ii) Saturday working at the Associated Development Sites**

**(iii) Whether extent of construction period and rural nature of the location has properly assessed health impacts of construction and associated activities including traffic**

**(iv) How has regard been paid to the protection of residential gardens from construction activities, and the subsequent operation of the site**

Oral presentation made by Chris Wilson on behalf of TASC is included in the following:

“As the extent of activities on the LEEIE site have slowly emerged, TASC have concerns that there has been no specific consultation with those residents directly affected by those 24/7 activities. This includes but is not limited to assessment of air and dust from the spoil heaps, noise and lighting from the car park, bus journeys and HGV movements.

“The Leiston LEEIE will be served by the rail line in the early years, and it should not be forgotten that the effect of noise and vibration on the many houses in Leiston, if it has not already been, must be factored in, as many of the houses that will be affected, are for young families with children. All these issues have health and well-being implications particularly regarding sleep disturbance.”

#### **4. Effects on Public Rights of Way and Non-Motorised Users and understanding of implications for people with protected characteristics**

##### **(i) Suffolk Coastal Path**

TASC have major concerns about the adverse impacts for the enjoyment of users of the coast path during construction activities and from subsequent recharging of the SCDF and the use of the permanent BLF during operation. But our short point here concerns the use of the beach by horse-riders in front of the development site during construction. Because of the sheet piling installed for temporary flood defences, we imagine the horse-riders will share a much narrower area of beach with other users, so TASC are asking whether, in view of the anticipated loud and potentially sudden construction noises, there has been a risk assessment for the danger horse-riders themselves face, as well as the risk to pedestrians sharing the beach with horse riders during construction.

##### **(ii) Bridleway 19**

##### **(iii) B1122 in the early years**

Oral presentation by Pete Wilkinson on behalf of TASC:

“I would like to address timing, mitigation and the potential health effects of using the B1122 in the early years.

“It is our opinion that, where humanly possible, mitigation should be carried out before the damage for which the mitigation is made necessary is inflicted, otherwise the result is a period - short or long – of unmitigated damage. Mitigation for the vehicular impact on the B1122 is defined in EdF documentation as “to make stress be more easily borne”/“to lessen the severity of” the impact of the construction on local residents. This is the impression local residents were given as the sort of mitigation they could expect with EDF building and finishing the Sizewell Link Road, bridge and roundabouts before anything else is built so that those local residents on the front line can at least get their cars out of their drives, breath relatively clean air and sleep at night due to reduced noise.

“The SLR is classed by EdF as "mitigation" for the relief of residents’ stress along the B1122. Therefore, the SLR should be completed in its entirety before any other EDF SZC project is started. Instead, EDF proposes to immediately begin many aspects of the build, resulting in the unavoidable use of the B1122 long before mitigation is in place in the form of the SLR.

“This will require intense vehicular use of the B1122 and gives no time, incentive, or ability to build the SLR in the timeframe of 18 months to two years. Should the project ever go ahead, which we obviously hope is not the case, in order to incentivise EdF to reach its 18 – 24 month target for the SLR and thereby demonstrate its determination to undertake effective mitigation, the SLR and attendant Yoxford roundabout, Pretty Road Bridge and North Leiston roundabout should be constructed first to allow a direct route into the site, before any other constructions in the area of Sizewell and Leiston takes place. This would represent true mitigation for the congestion, pollution and threatened physical and mental wellbeing – including the possibility of traffic-related injury and even death - due to the inadequacy of the B1122 especially if required to support all construction traffic in the early years.

“Other traffic along the B1122 will be generated by many energy and SZC-related activities in the area and would create intolerable conditions for residents throughout the region, but particularly for those living along the B1122, a single track road barely 7 meters wide with few pavements available for those on foot. This presents local residents with the prospect, should the project go forward without prioritising the construction of the SLR, of at least 3-4

years or even longer for the SLR to be completed – four years of unbridled noise, fumes, particulates, danger and inconvenience. Indeed, as one resident put it, it would be ‘Hell on Earth’.

“The effect on the mental and physical health of local residents is difficult to imagine or quantify although the impact of noise on health is today being more closely examined: Dr Samuel Cai, an epidemiologist at Imperial College London says, “There’s consistent evidence that road traffic noise leads to heart attacks.” In an analysis he undertook of the health data of 356,000 people in Britain and Norway, he found that long-term exposure to traffic noise affects blood biochemistry, over and above the effects of exhaust fumes. Even with air pollution factored out of the study, he claims that “Noise seems to have its own effect on the cardiovascular system.” <https://pubs.rsc.org/en/content/chapter/bk9781782628927-00107/978-1-78262-892-7>

“The Applicant has provided figures for projected road miles over the 10 years of peak construction activity of 467 million kilometres travelled by car and LGVs and 18 million kilometres travelled by HGVs and buses on the SLR, that is purely from the A12 to the site and does not include the huge number of road miles involved in transporting the 12m tonnes of aggregates from one side of the country to the other.

“This begs many questions:-

- how many of these kilometres travelled from the A12 to the site will be on the B1122 rather than on the SLR if not built before the project starts,
- what will be the cumulative environmental damage in terms of the attendant pollution of those B1122 road miles from Nitrous Oxides, fumes and particulates in the form of PM10 and PM 2.5s and when will the methodology used to calculate that damage and the results, be made public for peer review,
- what will be the resulting cumulative toll of those B1122 road miles on the health and wellbeing of residents along the B1122 and when will the methodology used to calculate that toll and results, be made public for peer review, and
- will appropriate and adequate compensation be made available and in what form?”

#### **(iv) Other Rights of Way**

### **5. Cumulative Impacts on Health and Well Being**

#### **(i) Suitability of assessment and understanding of the broader effects on health and well-being including any effects of economic displacement and provision of social care and community health provision**

Nicola Pilkington made an oral presentation on behalf of TASC which is included in the following: “First thing as you know, we’re in a time of COVID recovery and there have been many reports coming from reputable organisations (BMA) about the long-term impacts of COVID and how they will be felt in years to come. So, when this morning I brought up about the Construction area and its surroundings being the most fantastic health resource that Suffolk could be utilising, I was very serious because so many people like myself could be benefitting from continuing to visit the area to walk, to enjoy the sunshine, to breathe fresh air”

In support of Miss Pilkington’s statement, TASC provide the following:

Natural England Chief Executive Maria Spain says “NE has made it clear that Nature is good for your health. For many years we’ve been working with our health professional colleagues to make sure we can create a healthy society which is even more important as part of a green recovery to help everybody cope with the long-term impacts of the restrictions on day-to-day life necessitated by the corona virus.”

Anecdotal evidence coming from East Coast Diabetes Service states that since last autumn there have been higher than expected referrals with newly diagnosed patients with type 2 Diabetes thought to be due to COVID and the changes in lifestyle it caused e.g. homeworking and unhealthy diet. Exercise programmes and dietary changes at an early stage can sometimes reverse a diagnosis. Diabetes care is already taking up a huge part of NHS budget and we can’t afford for it to take up more.

In 2020 Environment Secretary, George Eustice, announced a new four-million-pound budget for a cross government project aimed at tackling mental ill health through Green Prescribing. One of its envisaged outcomes is to develop best practice in making green, social activities more resilient and accessible. The project will run until 2023 and is supported by the National Academy of Prescribing, Ministry of Housing, Public Health England, Natural England, DEFRA and NHS England. Much more could be made of the AONB in this capacity and it is important to remember that many visitors who come to Suffolk do so for purposes of physical and mental health improvement.

Earlier this year WWT Launched Blue Prescribing Projects. This resulted out of evidence collected with two partner Universities on the impacts on health and wellbeing from being in Wetland areas. Projects like these could be successfully developed further on the Suffolk Coast and create huge national benefits.

A Health and Wellbeing Coast rather than an Energy Coast is something worth considering. It would give huge financial benefits and would reduce public spending whilst protecting the designated landscapes and sites.

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**(ii) Whether a sufficiently holistic view has been taken to bring together an understanding of the cross-topic concerns on health and well-being and as such sufficient/appropriate mitigation has been identified.**

Oral presentation made by Jenny Kirtley on behalf of TASC:

“TASC has considerable concerns regarding employment in the area, that is, local employment within the community.

“This year East Anglia, especially Suffolk, has seen an impressive increase in visitors to the area with accommodation full to capacity.

“The number of businesses looking for staff across the board is truly alarming and for employers, I know, it will be extremely stressful and financially challenging. There is hardly a business in the area that’s not advertising for staff.

“In today’s addition of the EADT, the Chamber of Commerce are voicing concerns about the lack of workforce in the area -

*‘These include the retail, hospitality, land-based, haulage and logistics sectors: all of which are significant contributors to Suffolk’s prosperity. Some of these shortages seem to be the direct result of the pandemic, whilst others have been growing for some time and have been exacerbated by recent events. Concerns over job vacancies in Suffolk | East Anglian Daily Times (eadt.co.uk)’*

“Many in local hospitality are either having to close early, close for the day or cancel lunches for the foreseeable future, mostly because of staff shortages. Should this development go ahead, it will only exacerbate the situation and one can only wonder, should many locals decide to work at SZC, quite how the area, with its many excellent pubs, hotels and restaurants & thriving tourist industry, will cope. Let us not forget the development is right slap bang between Aldeburgh & Southwold, two of the most popular towns in the area, if not the UK, and SZC could be the straw that broke the camel’s back and we cannot see how any mitigation or tourist fund will solve this problem. If local businesses have to close because of lack of staff, the long- term prospects of our tourist industry look bleak.

“TASC also think it’s important to make the point that SZC is already impacting negatively on local residents, both economically and in terms of serious stress. For example, a long-standing resident of Yoxford village has just had the offer she had accepted on her property withdrawn by the buyer purely because of what they have learned from the PINS Examination website. The inevitability of increased traffic and nearby roadworks for the new Yoxford roundabout and the attendant air, noise and light pollution has completely changed their mind and made them fearful of moving to this area. This does not bode well for anyone wanting to move away from a road that will be negatively affected by SZC and its related traffic, and there are many. It puts residents between a rock and a hard place, wanting to move but finding it difficult or impossible to sell.

“Speaking for myself as a long- term resident of this much- loved area, I hear nothing from the Applicant that doesn’t fill me with fear and dread and no amount of mitigation will offset the reality of this build and very sadly, impending doom.”

Regarding the Applicants response:-

“I did not feel the applicant’s spokesman, Mr Humphrey, addressed TASC’s concerns at all. Although he did mention labour market churn, in the long diatribe on the local jobs SZC will create, Mr Humphrey did not offer a solution, should there be a transition of local workforce to Sizewell C, only to say there would be a tourism fund. No amount of money can replace a lack of personnel to fill vital jobs needed in the community.”

## **6. Monitoring and Controls**

### **(i) Latest position on Community Fund, Public Services Resilience Fund and Natural Environment Funds**

Oral presentation made by Chris Wilson on behalf of TASC:

“It was interesting that in response to TASC’s agenda item 3 comment that the physical and mental well-being impacts from this development cannot be quantified purely in financial terms, was for the Applicant to say how much money was going to be paid into the community fund. But, turning to the Funds themselves, TASC would just like to remind the Examination that the Applicant is anticipating being only a minor partner in the SZC project and they propose use of the RAB model which, if adopted, results in us, as electricity bill payers, being forced to fund the interest costs, and, as taxpayers, being expected to assume some, if not all, of the risk of the inevitable cost overruns for the project as well as, us, as UK taxpayers helping to fund any direct contribution our government was minded to make. In addition, the Applicant is also looking for our UK pension fund providers to provide a major part of the investment. So, in essence the Applicant is trying to make much of the Funds available as a result of the adverse impacts of the Sizewell C project, but much will actually be funded by ourselves, not the Applicant.

“The Applicant’s response was, in TASC’s opinion, more of the same as Mr Philpott seems to find it hard to grapple with the notion that some IPs care more about the environment and

their own physical and mental health and that of others, rather than the quantum of a financial settlement the Applicant needs to make, as compensation for the damage the developer will inflict with this project. The Applicant also stated that the ExA should not worry themselves over the funding of the project other than in respect of compulsory acquisitions. TASC say that, as the Applicant does not have, or is not willing to invest, their own funds to meet the cost of the compulsory acquisitions, then the funding of the CAs and the funding of the development would appear to go hand in hand and cannot therefore be differentiated. And this begs the question why a company that has been operating for decades is unable to or is unwilling to fund their own proposals?"