

**From:** [REDACTED]  
**To:** [SizewellC](#)  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]@stopsizewell.org [REDACTED]  
**Subject:** Deadline 10 Submission  
**Date:** 12 October 2021 18:13:15  
**Attachments:** [Deadline10 Submission T&EPC Stop Sizewell C MLSG & Paul Collins.docx](#)

---

Dear SZC team,

Please accept this submission from Paul Collins, Theberton and Eastbridge Parish Council, Stop Sizewell C and Minsmere Levels Stakeholders Group as a summary of our current position and concerns regarding the DCO application from NNB SZC Co.

I apologise that being away for these last 10 days I have not been able to add various examination library references as I would have wished but am resolved to add them on the 14th October when I am once again in the UK and will submit this paper once again as a fully referenced version.

I am also concerned that I am yet to see a final version of the SoCG from the Applicant regarding BNG so will additionally submit the last draft I sent to the Applicant along with a transcript of the SoCG Teams meeting in support.

I apologise these will not be with you by the end of today but hope you will be able to accept them as late submissions.

Kind regards,  
Paul Collins  
Cllr. Theberton and Eastbridge Parish Council  
Chair, Stop Sizewell C  
Co-secretary, Minsmere Levels Stakeholders Group

Sent from my iPhone

# **Deadline10 - Final Summary of Objections of Theberton & Eastbridge Parish Council, Minsmere Levels Stakeholders Group, Stop Sizewell C and Paul Collins**

## **Summary of Concerns and Objections**

As a group of organisations and individuals, we are not, in principle, opposed to nuclear power. However we have been brought to oppose Sizewell C as a result of years of insufficient information, unsatisfactory community engagement, obfuscation and hidden agendas (such as with the route of the SLR, and the reasons for destroying Coronation Wood) from the Applicant, and multiple cumulative impacts on our community and environment.

Based on the evidence presented by the Applicant in writing, to Examiners' questions, through Statements of Common Ground and verbally through the Issue Specific Hearings, we remain deeply concerned that the development of the Sizewell C twin reactor project exceeds the ability of the local and Suffolk wide terrestrial and marine environment to assimilate the development project and operational platform.

At this time the plans put forward threaten the long-term safety, environmental and commercial integrity of the area, its surroundings and present a negative legacy for nearby communities and businesses once development work has been completed.

The Applicant has been unable to specify a stable and clearly defined envelope for either the development or the operational parameters/plans that are essential for such a large, potentially damaging and complex project. As a result, we believe that the current request for Development Consent Order approval should be refused.

## **Specifically**

### **Transport**

We continue to be concerned with the Early Years plans for use of the B1122 and the, so far, unclear impacts or otherwise of using the Sizewell Link Road (SLR) as a haul road to transfer somewhere in the region of 140,000 tonnes of backfill material from both the Two Villages Bypass and SLR to the Main Development Site (MDS).

There are questions about when this can start, given the requirement to bridge the East Suffolk Line, its practicality and impact management for the final half mile between the southern end of the SLR and MDS entrance, and how haul traffic will join the existing B1122.

We note the ExA's question on this in the latest request for information and are still concerned regarding potential impacts on the HDV limits agreed by EDF.

We continue to be concerned about the fact, based on the Hinkley Point C (HPC) experience, that for the first two years of site development the Applicant expects at least one Abnormal Indivisible Load per day to traverse the B1122 from the A12 to the MDS, and is not clear whether the development of the SLR will add to that total.

We are only too aware that HGV limits at HPC had to be increased and that the only impact was to EDF's finances as a monetary sanction was imposed but the impacted communities would have seen no real benefit from such a sanction. The same will be true for communities along the B1122.

### **Coastal Impacts**

In the initial DCO application, the Applicant attempted to keep any consideration of the design of coastal defences out of the examination on the basis that

- The Office for Nuclear Regulation (ONR) would have a final say on the defence of the reactor platform and design of the hard and soft coastal defence.
- The Coastal Processes Monitoring and Mitigation Plan (CPMMP) would manage any impacts from the design and implementation of the defences

On the basis that the ONR are not experts on the behaviour and specifics of East Anglian coastal change, impacts associated with climate change, storm surges and Sizewell Dunwich Bank changes, we are pleased that the ExA has ensured that these plans, that are key to impacts across the coast locally, have been brought before the Examination for scrutiny.

It is with significant concern that we have seen four changes to design of the HCDF, SCDF and BLF during such a short time and questions remain about the precise location, relative to the natural coastal embayment across Sizewell, and depth of the HCDF toe, especially at the southern end close to the interface with the existing Sizewell B defences.

So far the impact of the final shutdown of SZB on the shoreline across SZA, SZB, SZC and the CPMMP does not seem to have been considered in modelling for the SCDF which is the only protection afforded the HCDF.

Further questions and differences regarding geomorphology and impacts on the coast remain with Mr Nick Scarr and Mr Bill Parker where the Applicant and Cefas seem to be questioning years of established geomorphological understanding of the East Anglian coast and of their own observational reports.

We are aware of the submissions, from both of these IPs, that will be submitted at Deadline10 and endorse their views.

We are also aware of the SoCG that will be submitted between the Applicant and Mr Nick Scarr and endorse his views of lack of progress with the Applicant.

### **Environmental Impact**

We have considerable concern regarding the negative impact on the AONB, Heritage Coast and designated sites at Minsmere, Sizewell and Dunwich both during development and operation.

We are aware of the submissions of Paul Collins regarding Biodiversity Net Gain (BNG) and his SoCG discussions with the Applicant supported by Dominic Woodfield of Bioscan and Tom Langton.

The damage that will be inflicted on this highly interconnected and environmentally sensitive area is not just regrettable but is beyond acceptable given the recognition that we are not only in a climate crisis but also a Biodiversity crisis, something that is recognised in the upcoming Environment Bill.

The Applicant's claims of 19% Biodiversity Net Gain are indefensible and do not account for massive losses of biodiversity during the development phase of the MDS and all the Associated Development sites including Park & Rides and the Freight Management facility.

We understand that the assessment of the Applicant's BNG metric 2 calculations submitted by Mr Collins, when compared with BNG metric 3 calculations, are shown to be comparable, thus reinforcing that submission. Further submissions by Mr Woodfield of Bioscan at Deadline10 reinforce the view that the Applicant's claims are erroneous and constitute exaggeration and by proclaiming them publicly an attempt at greenwash. We fully support Mr Woodfield's submission and Mr Collins' previous submissions on this subject.

The Applicant's statements in hearings that "they don't recognise" their own BNG assessments is a result of a reliance on actions through the LEMP negating poor BNG assessments in their calculations.

It is now apparent from metric 3 calculations that as far as the MDS is concerned, the assessment of 25% loss in Biodiversity is probably a significant under estimate with the true loss being closer to 40%.

The Applicant in relying upon above average performance for habitat creation and improvement against the LEMP plans is unrealistic as an overall strategy. There is an equal likelihood of failure of achieving LEMP objectives in both areas where BNG assessments are negative, due to the difficulty of establishing or improving habitats, as well as with less challenging habitats.

Whilst it is not required for the Applicant to have submitted a BNG assessment for an NSIP, it is also true that where any designated site is being developed upon (Sizewell Marsh SSSI), NE guidance says that BNG should not be claimed as such sites cannot be assessed via metric 2 or metric 3.

However, as a BNG assessment has been made and claimed we feel that there should be a modicum of agreement between what the EIA and BNG assessments and what the LEMP seeks to achieve.

Such a balance is achieved when considering the compensation efforts for Fen Meadow and M22 habitats with an NE-imposed 9 fold multiplier and fail safe compensation package should the required quota not be achieved.

The fact that much of the development site is not assessed with such rigour does not mean that such insecurities of success are not present there as well.

### **Community Impacts**

From the viewpoint of Theberton and Eastbridge Parish Council, we are pleased that our concerns over the closure of all of the north/south connections lanes south of the existing B1122 have been acknowledged and that Pretty Road from Theberton to Saxmundham has been left open with a connecting bridge across the SLR but remain concerned that this is the only direct connection that will be left open.

There remain several issues for which remedies have not been identified:

- B1122 mitigation through Theberton for the Early Years has still not been finalised in terms of a pedestrian crossing and whether a 20mph speed limit can be introduced from the proposed village gateway entry signs on the B1122.
- We have still not seen any improvement in the Property Price Support Scheme to bring it in line with the sort of scheme operating at Hinkley Point. There are further concerns that the scheme was removed from the Deed of Obligation at an early stage with East Suffolk Council's consent but without any consultation with the villages likely to be affected. Cllr. Graham Bickers is pursuing this issue separately and with our full support.
- There remain concerns on Noise and Pollution impacts in the Early Years as Theberton village residents will experience significantly increased traffic flow on the B1222 and contributions from SLR construction and unspecified haul road traffic on the developing SLR. These are assessed but not in combination.
- Noise and dust impacts in Eastbridge, as well as rat running through Minsmere, on what are single track roads without any speed limit, continue to be minimised by the Applicant as issues that will not be due to their own workforce even when the causation will probably be due to increased traffic due to the Applicant's development.
- Given the experience with light pollution at HPC, we are clear in our understanding that the night skies in Eastbridge and the Minsmere valley will be severely compromised by the development for 10 to 12 years and are also concerned for the effects on wildlife in the area, quite apart from the environmental issues raised earlier in the summary, as this is not captured in either BNG metric 2 or metric 3 assessments.
- We remain appalled that the Applicant has determinedly resisted all your strong recommendations to provide visualisations of the construction phase. Local communities have a right to know what is coming, and it seems clear that the Applicant's refusal to comply is directly related to a fear of stoking opposition, as opposed to being a considerate neighbour.
- We remain unconvinced with accommodation plans for the workers campus and caravan site, given the significant expansion of maximum workforce revealed after the size of these two sites had been fixed. We are already getting feedback about significant increases in rental values in Leiston, a problem that will only increase should SZC be approved. We are also unconvinced that East Suffolk Council's contentedness with the existing arrangements supplemented by various funds to increase bed space availability by increasing the number of Houses of Multiple Occupancy and other such efforts as spare room letting. We do not believe these mitigation's will be successful, despite the Applicant's confidence in comparisons with HPC and Bridgewater when Bridgewater

population is approximately nine times that in Leiston and thus has much greater capacity to absorb large influxes of temporary workers.

## **Water Requirements**

It is astonishing that this issue is unresolved considering that East Anglia and Suffolk in particular is well known for being a significantly water stressed county. Indeed, as the operator of SZB, EDF and the Applicant must have been fully aware of the potential issues in supplying potable water at the volumes required for both development and operation.

This is particularly frustrating since IPs and consultees have been asking questions about water supply throughout the past 10 years, and have been receiving “don’t worry” reassurances but with no specific plans.

Now that the issue has come home to roost, it seems that apart from a very late application for a desalination plant for development, all that is offered for operation is a dogged insistence that Northumbrian Water (NW) will have to ensure provision for commissioning and operation in 10-12 years time, despite the fact that the means are unidentified.

We fail to understand how the project could be allowed to proceed given that the source, cost, sustainability and environmental and community impacts of securing such a water supply are all unknown. Will we, as residents, be forced to accept a detrimental proposal, at any price, because “water must be found”?

It is equally galling that the entire issue of potable water provision, including potentially providing additional water main connection with associated pumping facilities purely for SZC, is not part of the DCO application and examination.

The Applicant seems to think that provision by NW is a right and that all costs for such provision will have to be rolled into the overall cost base for NW and, in part, passed on to its consumers.

This is an issue that should have been resolved during pre-application consultations and fully elaborated within the DCO application.

Unfortunately this is a recurring theme within this project whether it be coastal defence or various strands of transport plans.

## **Finance**

We consider it an outrage that the Applicant has refused to either update or share information during the examination about the cost of the project. It is abundantly clear that these costs will have risen given the multiple changes to the Applicant's proposals, including the need for a water desalination plant during construction, and the increase in the cost of building materials. It is also certain that Sizewell C will only go ahead if it receives taxpayers' money and a construction "tax" on energy bills via a RAB model to incentivise investors. The latter is likely to be highly controversial, therefore the cost of Sizewell C is a matter of major public interest.

## **Conclusion**

Whilst we are dismayed at the government's recently stated support for nuclear energy, this cannot be at any price. The Applicant may be correct in stating that Sizewell C is the only large-scale project close to construction, but this does not mean it is the right project, or that the multiple negative impacts that would result are justifiable.

We note with interest the French President's announcement today of support for the less impactful Small Modular Reactors which he described as "safer" and a way to "reduce waste". If nuclear is to be included in the future energy mix, surely new technologies rather than the enormous and damaging Sizewell C are the way to go. We urge you to recommend that the project be refused consent.

I apologise for the lack of examination library references in the above, but working from my iPhone in Spain has reduced my ability to add these at this time. I intend to resubmit this with references on 14th October, being my first day back at home and I hope you will be willing to accept a replacement submission at that time.

Cllr. Paul Collins  
Theberton and Eastbridge Parish Council  
And on behalf of  
Minsmere Levels Stakeholders Group  
Stop Sizewell C