

# **Sizewell C Development Consent Order**

## **IP Reference no. 20025890**

The Secretary of State has invited Interested Parties to send feedback on new information generated in the last few weeks in its correspondence with the applicant and other interested parties.

We are writing this representation as Interested Parties and following previous written representations submitted to the applicant over the consultation period and to the Planning Inspectorate during the Development Consent Order process. At no time has this process given us any confidence that the proposed development is either located in an appropriate place or is the right step for the country to take in its preparation for a net zero economy. Very strong reasons remain why the project faces insurmountable environmental, economic and social issues that, despite the arguments of the applicant, just cannot be resolved in a satisfactory planning sense.

We continue to strongly support the representations that have been submitted by Stop Sizewell C, The B1122 Group, the Minsmere Levels Stakeholder Group, Theberton and Eastbridge Parish Council and other parish councils, the RSPB and Suffolk Wildlife Trust and many others. These include the recent representations submitted by Stop Sizewell C, summarised below.

- Inadequate plans for providing mitigation in advance of starting work on the main site, leading to very heavy use of the B1122 from Yoxford through Middleton Moor and Theberton and the inappropriate selection of the Sizewell Link Road route over Route W favoured by Suffolk County Council and others.
- Over-reliance on the Coastal Processes Monitoring and Mitigation Plan to resolve what could be significant and long-term erosion following the cessation of operations at Sizewell B, including exposure of the Hard Coastal Defence at its southern extremity.
- Unrealistic 2140 end date for removal of all spent fuel and decommissioning completion when statutory authorities and EN-6 legislation point to dates closer to or beyond 2190.
- Significant site flood risk beyond 2140 according to the applicant's own assessments.
- No agreed potable water supply plan for the operational phase of the Sizewell C reactors.
- Unsupported biodiversity net gain claims and significant biodiversity damage post construction both at the construction site and shingle/dune foreshore.
- Development of Sizewell Marsh Site of Special Scientific Interest with late and inadequate compensation plans that do not meet Environment Act 2021 requirements.

### **Our Detailed Comments**

As residents of Eastbridge we remain deeply concerned that the development of the twin reactor project exceeds the practical capacity of the proposed Sizewell C site.

The constrained power station platform is dictating unacceptable changes in site protection, layout and access that threatens the long-term safety and environmental integrity of the site and its surroundings and the legacy left for nearby communities and businesses once work has been completed.

The proposed Sizewell C construction will place an intolerable burden on this and neighbouring small rural parishes, on the thriving tourist industry in this special area, and especially on the uniquely sensitive and designated natural environments in which the project is proposed.

**We continue to believe that the cumulative adverse impacts of the proposed development considerably outweigh the claimed benefits and argue that the proposed development should be rejected** for the many reasons discussed before and at the hearings.

### **Reasons why the DCO should be rejected**

#### **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 we frequently 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 would 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.**

The National Policy Statement states that it is appropriate for other matters to be considered by the Planning Inspectorate. This must include relevant local policies from the key plans, including the Suffolk Coastal Local Plan and Local Plan Review, the County's Local Transport Plan and its Minerals Local Plan Core Strategy (now the 2020 Suffolk Minerals and Waste Local Plan) and its Local Plan Review, as well as other strategies such as the East Suffolk Business Plan 2015-2023 and the AONB Management Plan.

In these circumstances we believe that **the proposals do not comply with the East Suffolk Council - Suffolk Coastal Local Plan, in particular policies SCLP3.4: Proposals for Major Energy Infrastructure Projects and SCLP3.5: Infrastructure Provision and Policies MP3 and GP4 of the 2020 Suffolk Minerals and Waste Local Plan.**

### **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. 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.

### **Accommodation Campus**

**The proposed Accommodation Campus 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.

### **Borrow Pits and Spoil Management**

This aspect of the development would be unacceptable due to its proximity to Eastbridge and several individual residential properties. This is because of the threat of the many environmental implications identified as relevant in the Suffolk Minerals and Waste Local Plan. **Both aspects of the development would have a significant adverse impact on local communities and we believe that they do not satisfy policies MP3 and GP4 of the Plan.** The proposals do not adequately assess or satisfactorily mitigate any potentially significant adverse impacts.

### **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 several 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. 'Early years' traffic will be exacerbated by the planned trafficked water supply for the site.

During the Issue Specific Hearings the applicant described the proposed Sizewell Ling 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.

The applicant is not able to 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.

### **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.

### **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.

### **Environment**

**We strongly object to the development 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 miss-alignment of submission of Environmental Permits applications, the Nuclear Site License application and the DCO.**

We also strongly support the arguments of the Environment Agency, Natural England, RSPB, Suffolk Wildlife Trust, the AONB Partnership and 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.

### **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.

### **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 the applicant needing to reduce 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.

### **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.

### **Draft Development Consent Order**

**We are extremely concerned that the provisions of the Draft DCO, prepared by the applicant, are carefully scrutinised by the ExA and BEIS, in particular because of its many impacts on local communities most impacted by the form of the proposed development and must not be used by the applicant as a way of expanding use of the Rochdale Envelope or avoiding scrutiny of critical infrastructure within the examination period and afterwards.**

We are anxious that the proposed Draft DCO is carefully scrutinised by others, in particular the Examining Authority because of its many impacts 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 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.

### **In conclusion we believe that the proposed Sizewell C development is the wrong project in the wrong place**

#### **The wrong project:**

- Sizewell C is slow – it would take 10-12 years to build, so not generate any power until 2034 at the earliest.
- Sizewell C is expensive, costing £20+ billion, which could be invested in renewables such as offshore wind or hydrogen storage.
- Sizewell C takes a lot of carbon to build. The applicant's own estimates are that it would take 6 years to pay this back, meaning Sizewell C wouldn't contribute to net zero until 2040 at the earliest. The government's latest target is a 78% reduction in CO2 emissions by 2035.
- The type of reactor the applicant wants to build (the EPR) has an appalling track record. The few EPRs under construction are all well over budget and – in France and Finland – running a decade late. The only operating EPR in China has reported degraded fuel rod seals and been closed after international attention.
- No one yet knows how Sizewell C will be paid for; the applicant wants consumers to help pay for the financing through a the RAB model, but nuclear projects remain very risky.
- It won't help 'level up' the UK. Sites in the north and west would do more to narrow the economic gap.
- The UK government plans to eject the applicant's development partner – China General Nuclear.
- Nuclear energy is not green energy. There is as yet no long-term solution for nuclear waste.

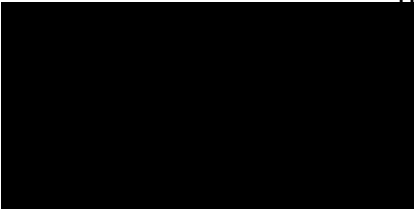
#### **The wrong place:**

- The applicant's claims of thousands of jobs for local people and billions of pounds spent locally are unproven. Sizewell C would damage the local economy; in particular the flourishing visitor economy.
- The applicant plans to bring its Hinkley C workers to Sizewell. It estimates almost 6,000 workers would come into the area; 2,400 of them would live in a "campus" near the tiny hamlet of Eastbridge.
- Visitors would stay away, losing the tourism industry up to £40 million a year and losing 400 jobs. The applicant admits 725 'local' staff would come from other businesses.

- The planned transport strategy that proposes a new 'Link Road' would not contribute to a sustainable development
- There would be many thousands of additional vehicles a day on the A12, including many hundreds of HGVs.
- The Sizewell C site is on an eroding coastline and surrounded by protected wildlife habitats.
- Toxic nuclear waste would have to remain on site for well over 100 years. One can envisage the waste of 4 redundant nuclear reactors on an island off the Suffolk coast brought about by rising sea levels and climate change.
- The site is wholly within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. Construction activities will cut the AONB in half for a decade.
- The site adjoins internationally famous RSPB Minsmere nature reserve, and some of Sizewell Marshes Site of Scientific Interest will be built on and there is dispute over the project's contribution to Biodiversity Net Gain.
- The development site does not have a secured long term water supply and there is concern about the impacts of a water desalination plant during construction. The development must not be permitted with no long term water supply.

**We strongly believe that the combination of the many serious environmental, economic and social issues that the applicant has failed to address throughout the 9 year consultation and 6 months of the examination contribute to an overriding argument that approval of the DCO should be rejected by the Secretary of State.**

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23<sup>rd</sup> May 2022