

MINSMERE LEVELS STAKEHOLDER GROUP

Paul Collins



Mr Mark Southgate
Director Major Applications and Infrastructure
Planning Inspectorate
Temple Quay House
2 The Square
Avon
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7th September 2018

Sizewell C Development Proposal and Consultations

Dear Mr Southgate,

I am writing to you, attaching a letter that was handed personally to both Mr J Crawford and Mr S Rossi of EDF Energy today.

It expresses our concern over the level of information provided in consultations so far and what might or might not appear in the forthcoming Stage 3 consultation.

In meetings with EDF, Minsmere Levels Stakeholder Group and other organisations such as RSPB, Theberton and Eastbridge Action Group on Sizewell and local Parish Councils, we have consistently been denied the rationale for a variety of choices and proposals made during Stage 1 and Stage 2 consultations.

Also, many meetings have been held with organisations behind closed doors and confidentiality agreements denying public access to potentially relevant information.

Despite that, we are also led to believe that little information of substance has actually been shared with any organisation, in confidence or otherwise, apart from with Environment Agency, Natural England and other such statutory consultee governmental organisations.

Consequently our request to EDF, contained in the attached letter, asks that they provide a full set of Preliminary Environmental Information at Stage 3 consultation in a format that is easily understandable by the public, specialist organisations, Parish, District and County Councils.

If such consultation documents cannot be brought together in time for their proposed consultation period at the beginning of 2019, then the consultation should be postponed until such time as a comprehensive consultation document is available.

I trust that you will understand our disquiet at the level of consultation so far experienced concerning the Sizewell C proposed development and our fear that the Stage 3 consultation will effectively deny the public and local organisations the ability to fully understand the cumulative effects of this proposed development.

I would be interested in any observations you feel you can make at this time.

Yours sincerely



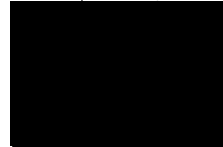
Paul Collins
Co-Secretary, Minsmere Levels Stakeholder Group



MINSMERE LEVELS STAKEHOLDERS GROUP

Planning Group
Convenor: John Keeble

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Tel: [Redacted]

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7th September 2018

Mr J Crawford
Project Development Director, Sizewell C
Hand Delivered

Dear Mr Crawford,

At the meeting between Theberton and Eastbridge Action Group on Sizewell C (TEAGS) and yourself on 25th May I promised that I would write to you regarding the meeting that you had help facilitate between Suffolk Coast Against Retreat (SCAR) and your experts on coastal effects and inland hydrology on 5th July. The meeting also benefited from the attendance by Adam Rowlands and Jacqui Miller of the RSPB, Giles Bloomfield, of the Water Management Authority as well as Paul Patterson of Coastal Partnership East and Lisa Chandler of the District Council.

The presentations and discussion we had with Colin Taylor and Barnaby Wiegand set out the current status of their measurements and modelling so far. It was clear to us that Colin's work on the coastal impact of SZC was well developed, although there continue to be potential issues about the temporary jetty, which you had also implied in our meeting on 25th May.

It appears that work on the likely impact of the development on the inland hydrology is still a case of a work in progress, with significant issues still to be determined including aspects of drainage and water runoff from the site of the proposed campus, the location and nature of any sand and gravel excavations, as well as the decision as to whether there was to be a culvert or bridge crossing of the neck of the Sizewell Marsh SSSI.

We also found the modelling of a hypothetical permanent breach to the north of the new platform interesting, although it was noted that no account had been taken of the effect of the inevitable rainfall that would accompany the initial breach or during any subsequent surge event.

I have also queried whether your colleagues had actually identified the point in the coastal frontage which we think might be the most vulnerable to such a breach and their response was received a week or so later with an explanation of their reasoning behind the choice, although it did not answer the point about a potential scouring effect at the BLF should breaches occur at this point.

We are encouraged that your colleagues shared their dilemmas so openly with us. However, we are concerned that at the meeting in May you stated that the Preliminary Environmental Information (PEI) that would be published in the public Stage 3 Consultation in early 2019 would be restricted to the areas of transport, accommodation and socio/economic impact, although the presentation at the Community Forum on 26th July seemed to indicate that PEI associated with the whole of the development site would be published at Stage 3

This ambiguity still leaves us with significant concerns as to the ability of both the public and the various local and national organisations to fully understand the impact of all the development aspects both individually and cumulatively over the lifetime of the SZC project.

You indicated that further discussions on the more technical environmental information would continue with statutory consultees only, when local government was in purdah from late March through early May, as the technical nature of such information was beyond the understanding of the public. I find this to be an unacceptable assertion and also contravenes the principle of consultation with the public.

This approach, would deny local and national specialist organisations, as well as our elected representatives, from responding adequately to the Stage 3 if this is to be the final public consultation to be undertaken by EDF prior to its formal application to the Secretary of State (SoS). The prescribed process which must be followed by the inspector as well as its very tightly defined timescale would significantly curtail opportunities for challenging EDF assertions or statements with informed submissions of substance during the examination of your ES and DCO application.

If the reason for not including complete information is that it is still being collected or analysed, then I believe that the consultation should be delayed until such time as a **full** PEI can be included in the Stage 3 Consultation documents.

We think that MLSG and SCAR will not be alone in their alarm if this is in fact EDF's intention. MLSG has repeatedly in its responses to Stage 1 and Stage 2 and elsewhere, asked that this critical environmental information and clear statements of cumulative impact across the SZC project should be made available during the statutory consultation process.

This requirement has been echoed by both Suffolk Coastal District Council and Suffolk County Council in their joint submissions as well as RSPB, SWT, National Trust, Suffolk Preservation Society and many of the local Parish Councils. Whilst we welcome that information is beginning to trickle through selectively, it is only a start and as yet incomplete.

Our expectation, therefore, is that the PEI that will accompany Stage 3 will in fact be a very well developed draft of the full Environmental Impact Assessment for your preferred development options at Stage 3 which, after due consideration of consultation responses, review and amendment, will go on to form the basis of EDF's ES in the formal DCO application.

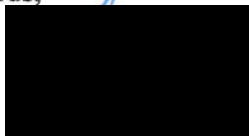
I would also reiterate the SoS requirement that the Stage 3 Consultation documents give clear reasoning as to why some options are rejected in favour of your preferred option. When comparisons are given between the options it will not be acceptable to have each option with different attributes where no immediate comparison is possible as was presented at the Community Forum in November 2017. All options within a certain class will have common attributes and they should be listed and evaluated on a common scale so consultees can see the comparisons easily. Where unique attributes exist for an options they should still be listed but in such a way as it is clear they are unique and can be referenced in any reasoning behind the preferred choice.

In reviewing other new nuclear power station consultation documents, we have found them to contain more comprehensive data and reasoning to support their preferred options and give clearer summary of cumulative impacts for their projects even at Consultation Stage 1. The SoS Scoping Report Opinion of May 2014 stated that the information to be provided should be clear and that cumulative effects be called out separately and not require the reader to hunt around all the individual impacts in separate sections of such documents.

Of course if your proposed PEI in the Stage 3 Consultation documents is incomplete, then it would be impossible to understand cumulative impacts in a document that is itself incomplete.

We would therefore much appreciate early reassurance from you that the PEI that will form part of the Stage 3 consultation will be the comprehensive document that we are expecting and in a form that complies with the Secretary of State's requirement.

Regards,



Paul Collins

Co-secretary Minsmere Levels Stakeholder Group
Co-chair Theberton and Eastbridge Action Group on Sizewell

cc:

Simone Rossi, Chief Executive, EDF Energy (hand delivered)
Mark Southgate, Director of Major Applications and Infrastructure, Planning Inspectorate
Richard Smith, County Councillor for Blything
Therese Coffey, MP for Suffolk Coastal