



Together Against Sizewell C



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by email only

To PINs, EDF Energy, SCC and ESC

Pre Application for Sizewell C

Observations, comments and dissatisfaction

on lack of information and detail

during the EDFE 4 Consultations and before DCO

Consultation Process

TASC feel it is important at this stage in the proceedings and before any DCO is submitted to the Planning Inspectorate to voice our disquiet at the inadequacies of the Consultations carried out by EDFE. The lack of detail and evidence on very many matters leaves us concerned as to how the many varied issues will be dealt with when brought to the Planning Inspectorate. We are concerned that it will entail the Planning Inspectorate imposing a great many conditions. We have featured just a few such concerns in the content of this Paper.

We were told that the new method of considering Infrastructure Applications would hasten the proceedings and the developers would provide enough information during the Consultation Process so as to achieve a comprehensive well considered plan before the DCO was submitted.

This most certainly is not the case with this EDFE SZC Plan, TASC has pointed out at every stage of this process that we do not have the information or evidence for EDFE's claims. Consultees are still left without even the most basic of information in many instances.

We submit that this renders the process inadequate and invalid.

It would appear that EDFE has not read the Guidance on Pre application Process 2008 and definitely has not adhered to the openness and transparency which allows for Consultees to make proper judgement.

When EDFE does submit its DCO, it is hoped that the Planning Inspectorate takes into consideration our deep dissatisfaction at the way EDFE have avoided the many in-depth questions which have been submitted by many consultees.

We are also worried that many studies which are required to substantiate EdFE's claims regarding the development have not been available to members of the public.

The process began on November 21st 2012. We have responded to all four Consultations, the last of which was held July to Sept of 2019. Many of the issues we have raised during that time have been raised by others, including Statutory Authorities, NGOs and individuals.

We have attended all exhibitions, and made many requests for additional information. Some of the suggestions and matters in the Consultations have been considered and some changes made but in total, these changes do not substantially alter the fact that information across all four consultation stages has been sparse and insufficient for informed decisions to be drawn.

Major requests and concerns have been ignored or brushed aside. This is particularly true on environmental matters, including the EIA which we are told we will see at DCO stage. To make a proper appraisal, the facts and evidence are key; without them it is just guesswork. It is the developer's responsibility to provide the consultees with proper researched facts to make sure all matters can be considered thus enabling a good judgement to be made. Many such matters have still not been addressed.

Mapping

TASC requested better mapping which should include ordnance survey grid lines, road numbering and contour lines. It has been difficult to fully comprehend where roads, rail lines and suggested storage facilities and off site lay-up areas are sited without the proper mapping.

This has never been addressed

SZC Siting

We have stated many times that this site is unsuitable because of its situation in the AONB, SSSI and other designations, the proximity of the SZB station and the encroaching North Sea. The policy in NPS EN6 states that Sizewell is a "potential site". It is TASC's belief that, to date, EDF have not proven that the site is suitable. In fact quite the reverse. To build the two EPR reactors and all other buildings required for its operation on a 32 hectare site means the situation is intolerable in this unique position. Even when operational it will appear cramped and a blot on the landscape. The fact that some SZB buildings which are on the SZC land have to be demolished is proof that every centimetre of land is required. It was hoped that EDF would recognise this for themselves after the 2nd Consultation when it became clear just how much land would be needed to create two nuclear reactors in such a remote area of East Suffolk. Instead they have continued to try to make it plausible by taking more of the SSSI and pushing the eastern berm nearer to the North Sea.

This ignores any due regard to the sensitivity of the main SZC Nuclear Site and the area it will occupy. We can have no comprehension of the total area required for such a massive undertaking without a visible floor plan, indicated by a substantial map,

Without such a map, it leads to major concern about development creep. We have asked EDF many times for such a plan and have recently been told by SCC that they, too, have not had sight of a comprehensive plan.

EDFE say that such a plan will be available for DCO. But how are we to judge what proportion of AONB and SSSI will be lost if this information is not available now in the pre application period? It indicates to us that EDFE have little knowledge of how the site will be set out to contain all the buildings and facilities during the build program and subsequently when the station is completed and operational.

Where is the Dry fuel store to be placed? Where is the new sewage works, how is the sewage to be managed and where is its discharge point? The same questions apply to the dewatering of the site. The four pylons which will scar the landscape and which are apparently necessary to feed into the National Grid were not considered until Stage 3 of the consultation. We do not know the outcome.

It has been suggested that many such details can be wrapped up in the 'Rochdale envelope'. We question this assumption.

This information must be made known to allow consultees to arrive at informed opinions. None of this type of crucial information should be allowed to be wrapped up in the Rochdale envelope at DCO stage.

The Duty of Regard for the Suffolk Coast and Heaths AONB has not been taken into account and neither has the integrity of the SSSI.

SZC Flooding and CO2

Since the Government has declared a Climate Emergency, TASC believes EDFE should have appraised consultees with facts and figures of likely scenarios for sea level rise, storm surge, unusual rain fall and weather patterns for both coastal and fluvial flooding using the latest predictions during the pre –application stage.

a) With its front loading of 12 years of CO2 emissions over the period of the 12 year of the building programme how is this helping the Government to achieve its target of zero CO2 emissions in the given time scales?

b) An in depth study of the worst case scenario of both sea and fluvial flooding should have been undertaken, we are told EDFE can build defences to protect their site.

Without a full study of the East Coast north and south of SZC which is already under threat, we are once again guessing at the possible outcomes over the period of time the site has to be protected, particularly if it is by hard defences.

If protecting the SZC site means damage to the extended coast, we need the evidence to show how any further coastal erosion will be paid for and managed.

Fiscal policy should be put in place so that damage to the coast caused by SZC defences is not a burden on the public purse.

Permanent Access Road 2.2kilometres

TASC has a major criticism of the project which is that of the proposed Permanent Access road. Its position is solely for the convenience of EDFE. No alternatives or options have ever been considered.

TASC asked that other options be considered at Stage 1 response.

This request has never been addressed.

Some minor changes to the alignment to accommodate bats was undertaken. However, the concerns for the fragmentation of the AONB dissecting corridors for wildlife has never been considered by EDFE as a cause for a major change to the access route. The access road in this position will lead to the SZC site via a new Culvert over the SSSI and water courses. This is in itself is a real concern for many consultees. The dual carriageway will carry all vehicles to and from the SZC site. At present the management of water on Sizewell Belts and Leiston River and on Minsmere Levels is pivotal at this location. This delicate management of water which is essential for both Sizewell Belts and Minsmere Levels is yet not understood or proven to be viable. We are aware that EDF requires the acquisition of 12 hectares of SSSI in this area.

EDFE should not be allowed to dictate their needs over the requirements of the precious habitats, they have not proven that what they intend to do will not seriously damage, disrupt and disturb these unique marshy areas. Much more investigation should have been undertaken. Mitigation is not an answer.

Other matters which emanate from the proposed permanent position of the Access Road which are totally inappropriate with the AONB designation are

Lay up area close to RSPB Mismere 24/7
Batching Plant close to RSPB Minsmere 24/7
Rail line unsure of route
Lighting 24/7
Noise. 24/7

Borrow Pits routes to site unknown, quantites and qualities unknown

In total as far as we can ascertain the total land take for the above is 350 hectares, which may include land east of Eastlands Estate (LEEIE).

Whereas NPS EN6 states the nominated site area is 117 hectares.

It is a failing of EDF not to acknowledge that many consultees are gravely concerned by the implications of the damage which will be caused to the AONB SSSI and the high conservation value of this area.

Alternatives and Options should have been considered.

Transportation We have also asked for details on routes and quantities of the transportation of aggregates, steel, and all materials on and off the site. We still have had no satisfactory answers. EDF have as yet to tell us where the materials are to come from meaning there is no possible way of assessing which routes are to be used.

Lack of information

Sizewell Beach Area

TASC requested more information on how the route over the SAC (Bent Hills and Heritage Coast with vegetated shingle) was to be managed. The consideration for the jetty has been withdrawn.

However, any materials coming to the SZC site will still need a route from a beach landing facility to SZC site over this sensitive area. Sadly this is still a totally unknown factor including any lighting facilities.

This intrusion will compromise the Heritage Coast Path, soon to become the English Coast Path. This is an important matter for the many tourists and local people who use the area for quiet recreation.

More detailed information has never been given.

Further Observations and Unanswered Questions

Following on from Stage 3 and Stage 4 when so many questions were asked, more details are still not forthcoming.

(see TASC Response 4th Consultation page 6.

And Response to Stage 3 requesting much more information)

These include the following

- 1) Total lack of EIA information. Not available till DCO.
- 2) Replacement mitigation for Fen meadow SSSI. Far too little information on either Site 1 or Site 2. No evidence to prove the assumptions.
- 3) Replacement habitats for Marsh Harriers. No evidence
- 4) The Fish entrainment at the cooling water intakes is still unknown. (Hinkley C proposals is still under discussion and not agreed.)
- 5) Potable Water quantity and source is still unknown and still under discussion.
- 6) Beach frontage. The Green Line as agreed for SZB is not being adhered to, the berm is too far forward of this agreed green line. How is this to be addressed?
- 7) Traffic Management Plan for Leiston Town
Traffic management and how to accommodate the influx of employees?
- 8). The socio-economic case only points out the perceived gains but says nothing of the loss particularly for a decrease in house and business values. Not enough detailed socio-economic information.
- 9) Town Water availability during build and operation
This information is crucial in this dry region, where water for farms may be restricted
- 10) Storage of Waste (Spent Nuclear Fuel)
- 11) Footpaths and Bridle ways

All of the above and many missing and unknown elements show that the four consultations undertaken have been inadequate and that not enough attention has been paid to the comments and concerns expressed by those who were consulted.

Many of these points have been raised in writing by TASC at the four stages of Consultation. None have been adequately answered.

We remain of the opinion that on the flimsy evidence so far revealed it still appears that the many dis-benefits which will accrue from the planned Sizewell C development far outweigh any perceived benefits.

TASC therefore respectfully request that when EDFE submits its DCO Application, PINS takes into consideration TASC's concerns and unanswered questions and the inadequacy of the Consultations when undertaking its duties regarding the acceptance or rejection of the EDFE DCO.

Joan Girling Secretary for and on behalf of TASC (Together Against Sizewell C)

**Cc EDFE Mr Paul Morton SZC Project Director sizewell@edfconsultation.info
East Suffolk Council, Suffolk County Council. Environment Agency.**