

[REDACTED]

6th March 2020

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol BS1 6PN

Dear Sir/Madam

Re: EDF New Nuclear Build's Sizewell C nuclear power station proposal

I am writing on behalf of Theberton and Eastbridge Action Group on Sizewell (TEAGS).

During the pre-application consultation process for the above we have become increasingly concerned about the lack of environmental impact detail, justifications for options chosen and the lack of an Appraisal of Sustainability (AoS) for Sizewell C by EDF New Nuclear Build (EDF NNB).

We note that a preliminary AoS was submitted to the Stage 2 public consultation for the Hinkley Point C project and we are aware that one is required to ensure Sizewell is included as a potential site in the new National Policy Statement for new nuclear power.

This lack of information has made it extremely difficult, or impossible in some cases, for TEAGS to assess whether the conclusions EDF have reached regarding impacts, option rejections and decisions within the avoid/mitigate/compensate hierarchy are appropriate, as insufficient evidence has been presented during four public consultations.

At each of the three consultations TEAGS have responded to, we have pointed out our concerns, but as each consultation has been released, we have found ourselves in a position whereby insufficient detail has been forthcoming.

TEAGS remain unable to make informed responses to the Sizewell C (SZC) proposals that give proper consideration to the environmental impacts and assessments associated with the development, as studies that were proposed over six years ago in Stage 1, and even earlier in EDF's Scoping Report, have still not been made available via the consultation process.

According to the advice from the Department of Communities and Local Government: 'Planning Act 2008: Guidance on the Pre-application Process':

The front-loaded emphasis of consultation in the major infrastructure planning regime is designed to ensure a more transparent and efficient examination process. (6.)

This document also refers to section 50 (3) of the Planning Act 2008, which makes clear that applicants 'must have regard to any guidance under this section' (i.e. pre-application procedure).

TEAGS were told by EDF that the Stage 3 consultation would contain more information but that EDF were cautious not to overload the public with technical information. This approach by EDF, of

withholding information at this stage, has significantly contributed to our inability to comment on an informed basis on the little information that has been provided.

Baseline information material and surveys are referred to in the Preliminary Environmental Information (PEI) documents, but these have not been made available during the consultations despite repeated requests and we are told that these will only be made available through the Environmental Statement at publication and acceptance of the Development Consent Order (DCO).

Suffolk County Council (SCC), East Suffolk Council (ESC), Environment Agency and others have all commented on the paucity of information made available by EDF NNB for respondents to make informed responses throughout the four-stage consultation period.

Paragraph 19 of the above pre-application guidance document, states:

A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues.

As a small local action group, we have limited resources to scrutinise complex proposals such as this for one of the largest construction projects ever contemplated in the UK. As a result, it is vitally important that EDF provide clear and well organised information on their pre-application consultations so that organisations such as ours can come to an informed position and be well prepared for the eventual DCO application submission.

At Stage 2 we stated:

A major weakness of the Stage 2 consultation document is that nowhere is the cumulative impact of all the processes brought together so a proper evaluation can be made and informed responses given. See Appendix 2 for a sample visual. The absence of an index and minimal internal cross-reference make it difficult to access information.

Given the sensitivity of the coastline both inland and seaward, we have been unimpressed at the paucity of detail regarding the possible, or probable, environmental impact.

There is a significant omission in the Stage 2 Document provided by EDF regarding water requirements through both the development and operational phases. This is a clear and regrettable omission from both Stage 1 and Stage 2 consultations and needs to be addressed, considering this area is known as one of the driest areas in the UK.

There is a frustrating and worrying lack of detailed information on many aspects, making informed responses difficult, sometimes impossible. All too often there is vague reference to further research to be done, and to minimising and mitigating impacts, with no clue as to the nature of those measures. We would urge EDF to provide far more information as it becomes available, for example on transport and the environment, on coastal impacts, on health and community impact assessments, and on tourism, rather than wait until Stage 3 or beyond, when once again we will have too little time to respond properly.

and,

Overall, despite its length, the Stage 2 Document offers insufficient detail on key aspects such as transport, environmental impact, community and health impacts, making it often difficult to make informed comment. There are frequent vague references to ‘appropriate mitigation’, to minimising the impacts, but with little detail given, such promises are not reassuring.

At Stage 3 we stated:

Preliminary environmental information is close to non-existent in places, with too much relying on work that EDF has not yet reported or even started.

The Secretary of State (SoS) requires EDF to assess and document cumulative impacts both within the Sizewell C & D development and in consideration of any projects that are or will be in process at the same time. Neither assessments have been attempted in what is supposed to be the final public consultation and as such we cannot assess the impacts on the environment, the residents close to the development, or the tourist industry that is key to the prosperity of this area.

EDF has not adequately explained why it has not properly considered and compared other campus locations, either locally - as examined by Boyer and Cannon - or further afield - as suggested by Suffolk County Council in its Stage 3 response. This is inconsistent with other issues; whilst EDF has attempted to provide a comparison of the environmental impact of various road route options (albeit basic and inadequate, in Table 10.1), there is no attempt to provide a comparable table for environmental impacts of accommodation options, despite being asked to do so at Stage 2 and in a verbal meeting between TEAGS and EDF in September 2018.

There is - as before - a woeful lack of information at Stage 3, as emphasised by two statutory stakeholders: the District and County Councils in their joint response. The observation by District Councillor TJ Haworth-Culf: "The devil is in the detail, but the detail isn't there" clearly struck a chord and was much quoted by members of both Councils. And this despite the considerable number of pages of material that EDF has provided.

Community Impact Assessments have not been completed. As we stated at Stages 1 & 2, Community impacts - including air quality, noise, transport and landscape - should have been assessed before EDF finalised its community consultation, not afterwards. In general, as before, the parts of the Sizewell C & D build are treated separately, and we are left to calculate the collective impact. There is very little mention of cumulative environmental, traffic, social, community and other impacts of the Sizewell project, and no assessment of the combined impact of overlapping Energy Projects.

We consider it an indictment of EDF's failure to provide sufficient information that the two most important statutory consultees - the District and County Councils - are withholding their support for the project. We are also aware of the strength of concern being expressed by important environmental bodies such as the RSPB, Suffolk Wildlife Trust, the AONB Partnership, The National Trust and Suffolk Preservation Society, and by Parish Councils and other community groups.

and,

Too many studies have not been conducted or reported; given the lack of detail and uncertainties on environmental and ecological impacts, it is possible that there may be insurmountable problems that could prevent the build going ahead. This lack of information means that Stage 3 - supposedly the final stage of public consultation - is not fit for purpose.

It was stated that Stage 3 was to be the final stage of consultation but at very short notice over the summer holiday period in 2019 EDF NNB entered a further pre-application consultation.

At Stage 4 we stated:

This fourth stage of consultation makes no attempt to address prior consultation shortcomings highlighted by TEAGS. We are not alone in this disappointment; indeed we note there are around 300 issues that the County and District Councils highlight as having not been addressed in Stage 4.

We are frustrated that, once again, the proposals at Stage 4 show little or no evidence that the developer has so far given our suggestions ‘proper consideration’ as required by PINS.

The overall lack of detail in EDF’s proposals, including key studies that are missing or not reported on, including Health and Community Impacts, specific Traffic information - such as estimates of traffic flows at the site entrance - and Environmental Impact including a full ecological survey of Sizewell Marsh.

The existence of other energy projects in close proximity to Sizewell C & D is very little mentioned or considered by EDF. We are deeply concerned about the combined impacts of these projects together and see very little evidence that sufficient collaboration and cumulative assessments are taking place.

Between the Stage 3 consultation and this Stage 4 consultation, EDF submitted a Scoping Report to the Planning Inspectorate which claimed to have taken note of consultees’ responses; however the proposals matched exactly the contents of the Stage 3 consultation documents and the timing of its publication raises serious questions about whether there was sufficient time to consider the responses to the Stage 3 consultation.

On the Sizewell Link Road and Theberton Bypass proposal;

We understand an independent report has been commissioned and received by EDF to look at this route and alternatives such as the D2/W route. However, without this being made public, along with the brief for the work, it prevents us from commenting further upon its findings and the relative suitability of this proposal compared any others that were evaluated.

In this and other areas of the Sizewell C proposals, we have time and again been disappointed by the cursory dismissal of options, with no clear comparison of the relative merits or otherwise of options that are examined. We call upon EDF to publish such reports and evaluations well in advance of any DCO application so that local communities and organisations can give them proper consideration. This has been the wish throughout all stages of consultation and remains one of the reasons we requested a further stage of consultation in our Stage 3 response

and in conclusion,

We consider it an indictment of EDF’s failure yet again to provide sufficient information, that after Stage 4 the two most important local statutory consultees - the District and County Councils - say “the combined evidence of Stage 3 and 4 still remains insufficient for the Councils to fully evaluate the adequacy of the proposed mitigation proposals and to reach a final conclusion with regard to the development as a whole.”

.....

Too many studies have not been conducted or reported; given the lack of detail and uncertainties on environmental and ecological impacts, it is possible that there may be insurmountable problems that could prevent the build going ahead. The lack of information provided throughout four stages of consultation has not been fit for purpose.

A significant focus of this consultation was the introduction of the “integrated” transport strategy and adjustments to the Sizewell Link Road proposal. As a result, the EDF exhibitions visited a smaller subset of locations. However, no exhibition visited the two villages. Middleton and Theberton, most affected by this proposal and the exhibitions that did occur were confined mostly to daytime hours when a significant part of the population would be at work.

EDF NNB's lack of transparency and willingness to provide adequate detail to us during Stages 1 through Stage 4 as consultees, has prevented us from making an informed response to the consultations. As a result, we believe that this DCO application has not reached an appropriate stage for examination by the planning inspectorate.

The official guidance states under paragraph 15:

Effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State.

Maximum On-site Workers

In the Stage 3 consultation, EDF NNB introduced a new level of workforce analysis with a maximum on-site workforce of 7,900 compared to the previous 5,600 maximum. This was presented as being used for stress testing of the traffic model and a way of ensuring a "worst case" scenario which also accounted for the Sizewell B outages where up to 1,200 extra workers are on-site for several months per outage. At no point has the additional 2,300 figure been presented as a likely or serious potential scenario for SZC on-site workers.

We have now been made aware that EDF NNB have requested an increase to the 5,600 maximum worker numbers at Hinkley Point C site.

EDF NNB have had initial discussions with both the County and District Councils to this effect, although the numbers involved and final outcome are yet to be determined.

Both SZC Scoping Report submissions to PINS (2014 and 2019) referred to paragraph 6.2.17 of the 2014 submission which stated:

Therefore, the assessment will primarily focus on the impacts at peak construction (the phase of the workforce profile when approximately 5,600 construction workers will be employed at the proposed development, for a period of approximately two years).

Volume 1 of Stage 3 documentation states:

4.2.4. *This included a peak workforce estimate of around 5,600 workers on the main development site (of which approximately 2,000 were predicted to be home-based)....*

4.2.6. *The 'central case' workforce profile assessed for the purpose of Stage 3 is unchanged from Stage 2*

Reference is also made to the 5,600 worker estimates as having been contained in Stage 2 consultation documents and to be reliable as they have also been based on experiences at other EPR sites.

In Stage 3 documentation, the addition of a controlled caravan site for 400 caravans (~600 workers) to the plans was presented as further mitigation against the need for private rented and tourist accommodation based on the maximum 5,600 on-site workers.

EDF NNB's recent report on accommodation at Hinkley Point shows that the two campuses are far from full. The campus next to the site which has been operating the longest is only 70% full with 380 out of 550 spaces filled and Bridgewater less than 11% full with 106 out of 1,000 spaces filled with a total of ~4300 working on site at the time of the survey.

Overall only 31% of HPC campus spaces are filled. If this occupancy rate were to be replicated at SZC, at this stage in the development, it is equivalent to an additional 750 non-home-based workers

looking for accommodation within the community, which will increase further as the maximum of 5,600 workers is reached.

Stage 3 Volume 1, Figure 4.4 shows that should an increase to 7,900 peak workers become reality, all the additional accommodation is expected to be provided through increased use in the private rented sector, tourist sector and by extensions to existing private caravan sites currently used by tourists.

Moving from 285 to 795 tourist sector spaces and from 430 to 1,195 private rented sector spaces, an overall increase of 180%, will have a significant social impact on the area.

EDF NNB say this will require

“...mitigation via an enhanced Housing Fund and/or more stringent Accommodation Management.”

There is no additional provision proposed by EDF NNB. They say that one of the main purposes of the housing fund is to bring unused houses back into use, of which there are few in East Suffolk, and an increase to the number of houses of multiple occupancy. A situation that is already causing considerable parking and disturbance issues in Bridgwater and other communities around Hinkley Point.

Exactly what a “more stringent Accommodation Management” entails and how it might mitigate this increase in accommodation requirements and impact on local communities, is unclear.

EDF NNB’s current approach of relying on the local community to cope with this increased accommodation requirement for workers is unacceptable and shows a complete lack of responsibility and care for the impact on the existing economy of East Suffolk.

Stage 4 consultation documents introduced a transport strategy in between the previous “Road Led” and Rail Led” strategies, called the “Integrated Strategy”. It is noteworthy that this new strategy only considered the 7,900 on-site worker maximum and makes no mention of the previous “central case” 5,600 workers.

The consultation did not further consider socio-economic impacts of an increase on maximum worker numbers, reinforcing the position that the 7,900 number was still being used only to “stress test” the transport strategies.

Our conclusion, therefore, is that EDF NNB’s consultations with the public have been, at best, inadequate and, in the case of maximum on-site workers, potentially misleading without a full analysis of the possible consequences in areas other than transport.

TEAGS are of the opinion that as the second Scoping Report was clearly written in parallel to the Stage 3 Consultation documents:

- there was insufficient time following closure of the Stage 3 Consultation to adequately reflect on feedback obtained in the consultation
- subsequent inclusion of a third transport strategy was not submitted in the scoping report
- the realisation that the 5,600 maximum on-site worker numbers are likely to be increased to 7,900 and that this is not reflected in any Scoping Report

TEAGS submit that a further Scoping Report should be submitted by EDF NNB to request an opinion based on these significantly changed circumstances.

Following that, a further consultation should be entered into where these changes are properly called out, with consequential impact assessments and EDF NNB mitigation elaborated prior to the acceptance of any DCO application. This would also allow EDF NNB to provide PEI and other information that has been called for by almost all consultees, statutory or otherwise, during the four consultations that have already been held.

We note that under point 19 of the official guidance, it is stated:

Without adequate consultation, the subsequent application will not be accepted when it is submitted.

We contend that the public consultation has lacked rigour and, as an exercise in allowing the public to make informed comment on proposals, has failed to meet official guidance or the objectives contained within the Statement of Community Consultation and in terms of the potential maximum worker numbers has been inadequate and misleading.

As a result, TEAGS are of the opinion that the pre-application procedure has not been transparent because insufficient detail has been provided by EDF to comply with the guidance on conduct of a National Strategic Infrastructure Project (NSIP), has not met the guidance associated with the Planning Act 2008 nor the original or updated Statement of Community Consultation.

We feel it is important that we raise these concerns now and urge you to take them into consideration whenever EDF NNB decide to submit their SZC DCO application.

Yours faithfully,

Paul Collins and Alison Downes

on behalf of TEAGS Ltd

Copies to:

EDF Sizewell C

[REDACTED]

[REDACTED]) – Suffolk County Council

[REDACTED]) – East Suffolk Council

[REDACTED] – Suffolk County Council

[REDACTED] East Suffolk Council

[REDACTED] Suffolk County Council