



**RESPONSE TO EDF'S STAGE 3 CONSULTATION ON SIZEWELL C & D
THEBERTON AND EASTBRIDGE ACTION GROUP ON SIZEWELL (TEAGS)**



29 March 2019

1 INTRODUCTION

This response to EDF's Stage 3 Consultation on Sizewell C & D is on behalf of Theberton and Eastbridge Action Group on Sizewell [TEAGS]. This parish will be in the front line of construction for 10, 12 or more years, and will suffer greater cumulative impacts than any other parish in the area. Our community group, formed at Stage 1, has the full and formal support of the Theberton & Eastbridge Parish Council and campaigns to highlight the impact of the build on local communities, on our local environment and on our many visitors. The views expressed in this response have been reinforced both during a parish-wide survey to review our mandate as well as at a joint meeting with Theberton & Eastbridge Parish Council on 23 February in St. Peter's Church, Theberton in which 370 residents living within the area affected by the Sizewell C & D development took part.

TEAGS is not in principle opposed to a new power station at Sizewell. However we, and the local residents we represent, are concerned that the construction proposals for twin reactors 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 environment in which this project is proposed. EDF needs to do much more to protect the special nature of this area, our quality of life and be the good neighbour it aspires to be.

We continue to hold the view that the consultation process so far has been extremely frustrating. New proposals put forward by EDF at Stage 3, with the removal of a jetty to deliver materials and remove some unwanted materials, have resulted in an expansion of its requirement for quarries (borrow pits) from two fields to three fields and the introduction of a bypass and possible link road with a route that is completely unexpected. In the case of the campus location, despite strong local opposition expressed at both Stages 1 and 2, and by other stakeholders besides TEAGS, EDF has simply firmed up its original site preference and there has been no attempt to find a mechanism by which some of the 2,400 workers could be located in a more appropriate urban setting and where the potential for legacy housing, such as in Bridgwater, could be addressed.

This response will address our most pressing issues and also some of the wider issues of concern relating to people, the environment and the economy. It will also look back to the original intent of adding additional nuclear generating capacity at Sizewell and the subsequent impact of EDF's decision to try and replicate the Hinkley Point C dual reactor project, here at Sizewell.

This Stage 3 response reiterates many observations made by TEAGS in our Stage 2 response, because so many of EDF's proposals are unchanged and our concerns remain unaddressed.

2. OVERALL VIEWS

We are concerned that the proposals pay insufficient regard to the special environment, and have failed to react to the concerns expressed by TEAGS at Stage 1 and Stage 2. We consider that construction will damage the things that make this part of Suffolk so special; peace, tranquility and dark night skies. Visitors will be driven away by eyesores, closed footpaths and beaches, disruption, noise and light pollution, so hurting the area's thriving tourism businesses. We maintain that many of EDF's proposals exacerbate, rather than minimise the potential impacts and undermine the developer's aim to 'be a good neighbour'.

The diversity of our coastal habitats and their importance for wildlife are recognised by the local, national and international designations that protect this area – including Ramsar, Special Protection Area (SPA) and Special Area of Conservation (SAC), Area of Outstanding Natural Beauty, Heritage

Coast, Minsmere and Walberswick Site of Special Scientific Interest (SSSI) and Sizewell Marshes SSSI. These are some of the most biodiverse habitats in the UK, and it will be impossible to recover from the loss of habitats that host rare birds, animals and plants.

The project is enormous. In its National Policy Statement Review, the government's assumption is that a single new nuclear power station would require a site of around 30 hectares (based on Sizewell B), going on to say, "if a developer plans to bring forward a proposal for multiple units at a single site an area greater than 30 ha is likely to be needed".¹ Sizewell C & D are squeezed into only 32 hectares.

We are frustrated that the proposals at Stage 3 show little or no evidence that the developer has so far given our suggestions 'proper consideration' as required by PINS. This community will be in the front line of the construction chaos and, given the popularity of this wildlife-rich area with visitors, we see little commitment from EDF to genuinely minimise the impacts. The word 'temporary' relating to construction is misleading, as the 10, 12 or more years of the build threatens to damage the particular characteristics of this area for much longer.

Our continuing concerns from Stages 1 and 2:

- EDF has ignored opposition from local people, Councils and our MP by persisting with a new 'town' for 2,400 workers - 40% of the size of Leiston - on farmland next to Eastbridge, next to the AONB, close to Minsmere, and completely out of scale with the local population of barely 270 people.
- The impact of construction on the rich variety of wildlife habitats, and the fragile coastline, especially on RSPB Minsmere and the SSSIs, and potentially compromising the AONB itself.
- The impact on thousands of visitors faced with 10 or 12 years of traffic congestion, noise, vibration, light and air pollution, and damage to the landscape and loss of tourism income.
- 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.

Our new concerns since Stage 2 can be summarised as below:

- EDF's abandoning of a marine-led transport strategy was decided far too late in the planning process, after 2 stages of consultation, and has led to big increases in predicted traffic. EDF's proposed transport strategies - both of which are "road led" will put between 900 and 1500 HGVs a day on the area's roads, carrying up to 10 million tonnes of material. We note with concern that EDF's 'Rail-led' option is uncertain.
- We oppose a bypass of Theberton, which will impact too many residents and is not needed long-term, and we oppose EDF's choice of route for a Link Road for the same reasons. We have considered a dedicated relief road to be essential since Stage 1, when a marine-led transport strategy was intended, and EDF's assessment and dismissal of alternative road routes is too cursory.
- EDF's changes to the site itself will further destroy habitats and worsen visual impacts, including the relocation of Sizewell B buildings into woodland and open fields and the introduction of four 65-metre Pylons.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727628/NPS_Siting_Criteria_Consultation_-_Government_Response.pdf

- We consider that the site is not large enough to accommodate two nuclear reactors without enormous damage to the landscape and environment. Its proximity to the coast and impact on coastal defences/processes is of grave concern but it would also be unacceptable to move the platform back into the Sizewell Marsh SSSI.
- 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.
- EDF's consultation seems to have been poorly resourced (as acknowledged by EDF personnel to local people), and we have noted troubling comments about "copying and pasting"² Hinkley Point, and re-using the Hinkley supply chain, which lead us to believe that saving money is taking precedence over the impacts on people and the environment.

In sections 3 to 7 below, this response will address the following issues in more detail: Environmental Concerns, Accommodation Strategy, Transport Proposals, Impacts on People and the Economy and inadequacies with the Consultation Process.

3. ENVIRONMENTAL CONCERNS

The Sizewell C & D development site is situated between the villages of Eastbridge and Theberton and the town of Leiston. It is wholly within Leiston town council boundary but abuts Theberton & Eastbridge parish boundary and comes within 260 metres of Eastbridge. Close to 90% of the construction site is contained within the Area of Outstanding Natural Beauty. It is bordered to the north by the Minsmere-Walberswick Heaths and Marshes SSSI within which sits RSPB Minsmere, which is also a Ramsar site and has a European Council Diploma for Protected Areas and is a Special Area of Conservation. It is bordered to the south by Sizewell Marshes SSSI and along the coast is part of the Suffolk Heritage Coast.

EDF's plans will cut the Area of Outstanding Natural Beauty (AONB) in half for at least a decade, and threaten to compromise the purposes of the AONB designation itself.

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 Preliminary Environmental Information Report (PEIR) should be a draft of the Environmental Impact Assessment that will underpin the Environmental Statement used for the Development Consent Order application. The current documents fall far short of this objective, and do not provide adequate information upon which an informed assessment of impact and mitigation can be made.

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.

² <https://utilityweek.co.uk/copying-and-pasting-hinkley-design-could-slash-nuclear-costs-says-edf/>

EDF must address environmental issues particularly with regard to the special status of the Suffolk coast before seeking planning permission, but appears to have barely done so for this third and supposedly final round of consultation. Environmental best practice must be followed; EDF saying that it “will be taken into account” is not good enough.

The construction laydown areas, accommodation site, spoil heaps, quarries and causeway crossing of the SSSI have great potential to damage the fragile hydrology of both the Minsmere Levels and Sizewell Marsh. Alterations in the management of water runoff could make sensitive ecosystems wetter or drier, while the causeway crossing will impede the drainage of Sizewell Marsh SSSI habitat. EDF are required by the SoS to understand the relationship between surface and groundwater in order to ensure effects can be predicted and managed for the lifetime of the powerstation. It is clear in the Stage 3 documents that this relationship is still poorly understood.

As stated in our Stage 2 response, we still support a bridge crossing of the Sizewell Marsh SSSI as it will minimise impacts on groundwater flows through the gap between Goose Hill and the platform as well as maintain the most effective wildlife corridor between Sizewell Marsh and Minsmere Levels.

The Aldhurst Farm Habitat Creation site was envisaged as compensation for loss of marsh due to the creation of a bridge crossing of the Sizewell Marsh SSSI. Whilst this development is welcome, it cannot be considered as adequate compensation for the causeway crossing.

The proposed rock armour defence of the Sizewell C & D platform and Beach Landing Facility is inadequate, stopping above the low water line when it should go below it. Once the sacrificial dune erodes, the sea will be able to undermine the rock armour defence.

When quarry pits are refilled with excavated materials, there is a risk that pollutants will leach into the water table and Minsmere Levels groundwater over decades. EDF recognise the potential for pollution but are not proposing any long term monitoring or potential mitigation actions.

Spoil heaps, up to the height of a 10-storey building, could cause significant dust pollution to the AONB, Minsmere Levels and Sizewell Marsh and also affect human health. Winds in this area both from the south west in summer and north/north east in winter regularly reach 30-40 mph with gusts up to 60 mph. Farmers’ experience with fields under cultivation show dust to be a problem in these conditions, so there is little hope that fugitive dust from 35 metre spoil heaps, sitting on land that is only 15 metres above sea level, can be controlled.

EDF has introduced four new 65-metre high pylons since Stage 2 consultations - bigger than the pylons which currently march across the landscape from the existing power stations - which will negatively impact the AONB landscape and Heritage Coast, as there is insufficient space on the 32 hectare platform to install this infrastructure underground, which we totally oppose.

We fully endorse the Minsmere Levels Stakeholders’ Group’s response on these issues.

4. ACCOMMODATION STRATEGY

We still do not consider that EDF has properly considered and reported on alternative campus locations, perhaps multiple sites, in urban settings with suitable infrastructure in place, as is the case at Hinkley Point C. We fail to understand why this strategy was settled before the arrangements at Hinkley - where the onsite campus opened in June 2018 and the Bridgwater campus in December 2018 - could be fully tested. We also have concerns about the worker take-up

of private rented and other accommodation, thereby affecting availability for tourists and pricing young families out of the market.

The location for a campus at Eastbridge, in which 2,400 workers will be housed in 30 accommodation blocks, along with ancillary buildings and car parking for 1500 vehicles, remains unacceptable to TEAGS and the community it represents. Whilst we recognise that EDF's Stage 3 proposals now suggest limiting the campus site to the east of Eastbridge Lane, and to have no buildings higher than four storeys, the location remains wholly inappropriate. The campus would blight the landscape, affect visitors' enjoyment and be detrimental to the health and wellbeing of residents.

In refusing to change its accommodation strategy, EDF has ignored our concerns, the contents of the Boyer and Cannon report, the concerns of the County Council, our MP, the AONB Partnership and others. The Boyer and Cannon report concluded that the Eastbridge site had "significant cumulative environmental impact" and was the least suitable of the sites looked at. EDF does not even mention the Boyer and Cannon report in its Stage 3 documents, despite making a verbal commitment to respond to it during a meeting between TEAGS and EDF's Chief Executive Simone Rossi in September 2018. The AONB Partnership in its Stage 3 response writes: *"The proposals include the development of a major accommodation campus with buildings up to 4 storeys high within the immediate, ie hard up to AONB boundary, setting of the AONB **which would have significant and unacceptable impacts on the AONB characteristics.** This is most notable on the landscape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities of the AONB."*

This is a deeply rural area, recognized as a Special Landscape Area, with no street lighting, enjoying dark night skies, clean air and a very low baseline of noise. Such qualities are rare, and must be protected, not needlessly destroyed. Modern lighting techniques, sound-insulated accommodation blocks and soil mounds would not solve the issues. The campus will unnecessarily exacerbate the already considerable environmental impacts of the build, and place a disproportionate burden on Leiston, Eastbridge and Theberton. Viable farmland would be lost for the period of construction, and thus the possible loss of livelihood for those who currently grow crops and rear livestock.

The 30 accommodation blocks, of which 20 will have four storeys, and spoil heaps up to 35 metres high would not sit well in this low-lying landscape, with an average elevation of 16 metres.³ The campus, adjacent spoil heaps and quarries (borrow pits), with associated noise, light and air pollution, would sit above the hugely popular footpath to Minsmere Sluice, running over meadow and marsh from Eastbridge to the coast and once quoted in *The Times* as one of the top 10 walks in the country. Tourists – many of whom approach Minsmere via the Eastbridge Road – will be deterred. The local pub, The Eel's Foot, currently so popular with locals and walkers, will suffer loss of income.

We maintain that the health and wellbeing of local residents will be affected by noise, air and light pollution, a serious increase in local traffic, and the potential for anti-social behaviour. At Hinkley, use of the campus is not compulsory and is strictly single occupancy - if workers want to rent privately they are free to do so. Workers will be inside the security area, so if they want to socialise with anyone other than immediate colleagues, or use the sports facilities at Leiston, they will *have* to go out and add to the traffic flows. Boyer and Cannon estimate this could add up to 400 movements per day. What impact will this have on businesses and amenities in the immediate area?

During our visit to Hinkley we also asked about EDF's Worker Code of conduct. Whilst we were glad to hear that this was broadly working, we noted that the 500-bed onsite campus had at that time been

³ Source: Natural England (2010)

open less than three months, and the Bridgwater campus had not yet opened at all. Even so, we were told that there were occasions, especially on bank holidays, when people got “a bit rowdy”.

EDF states that it has assessed the implications of a larger workforce than originally predicted; of 8,500 in total, compared to 5,600. Whilst we welcome your statement “if more accommodation was needed for workers EDF Energy would not expand the campus”, we are concerned by the potential for unplanned development when you state your expectation that “local landowners would respond with proposals to create or extend one or more local caravan parks.”

We are not equipped to comment on the estimated split between home-based and other workers, but we note that EDF expects around a third to be home-based, willing to commute for **up to 90 minutes**, yet EDF resists suggestions to house 2,400 workers in towns (rather than beside a hamlet beside AONB land), citing travel time and additional vehicles on the road. The 1500 parking plus 1000 staff car park at the campus undermines the claim that a single on-site campus reduces road traffic, at least at our community level.

Traffic would increase significantly, with workers using their cars at the start and end of their shift cycles and for non-work trips. Workers on shift would also be bussed to their place of work within the site, adding to the air pollution and noise. It is disappointing that no details of anticipated car use by campus workers and campus staff have been provided by EDF.

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.

We continue to call on EDF to disperse the accommodation in one or more urban settings where there is existing infrastructure to cope with the massive influx of workers, which could benefit from the investment, and where - as at Bridgwater - the preparation of the site for future housing could be a legacy.

Issues of concern around the private rental market are addressed under 6, People and Economy.

5. TRANSPORT PROPOSALS

With a marine-led strategy being abandoned, transport is the area where the greatest changes since Stage 2 have been introduced, and the scale of the impact is breath-taking, with devastating and unacceptable proposals presented by EDF at the final stage of public consultations. At Stage 2 EDF acknowledged that it needed to do “further investigations on the likely effects of the increased traffic flow on the environment, amenity, road safety and highway junction capacity”. It has failed to do this to acceptable level.

We welcome the fact that EDF has at last accepted the need for a direct access route. That it has been left to this final stage of consultation, limiting opportunities for input from statutory and other consultees, is however regrettable.

We consider the descriptions of the two proposed strategies as ‘Rail-Led’ vs ‘Road-Led’ to be misleading, since both use mainly road. Whilst we would of course favour of as much freight as

possible being delivered by rail, multiple sources have told us that the rail part of EDF's 'Rail-led' strategy is unlikely to be feasible - as EDF itself admits - and our arguments in favour of a direct access route stand regardless of whether there are two or five trains a day. As we stated at Stage 2, we do not accept that the B1122 can carry 900 HGVs in addition to all the other traffic that EDF wants, without unacceptable increases in accidents, pollution, noise and congestion.

i. Link Road/Theberton Bypass (Road-Led Strategy)

We are opposed to EDF's proposed Link Road/Theberton Bypass route, as it is destructive to the local community and landscape in a number of ways: (TEAGS has never advocated bypasses)

- It runs parallel to the B1122, as close as 150m in some places, so would continue to impact homes on the road with noise, pollution, light and vibration – and other homes currently on side roads.
- It scars the landscape heavily, with multiple embankments up to 3m high and cuttings up to 3m deep for approximately 80% of its length. These would “require 45,000 cubic metres of additional fill material brought to site”.
- It will create a barrier, dividing the Theberton, Middleton, Yoxford and Kelsale parishes, splitting outlying homes and farms from their village cores, and preventing natural wildlife movement.
- It will create a ribbon of unusably small fields between itself and the B1122.
- It will disrupt local Public Rights of Way significantly – though EDF has failed to provide any details, other than it will “require local changes to the paths including potential diversions.” The area's network of footpaths and bridleways is important to local people and visitors.
- It complicates and obstructs local private and farm traffic to a high degree, closing roads that locals use to reach Saxmundham, such as Pretty Road, and country lanes that have been in use for centuries, and forcing tractors and combines along circuitous routes to reach fields cut-off by the road.
- It has no legacy value. Suffolk County Council have stated that they see little use for the route after construction and are reluctant to adopt it.
- It is proposed as having potential for extended hours (outside the 0700-2300 hours stated for 'Rail-led'). This is entirely unacceptable given that we have identified 35 homes that are no more than 250 metres from the road.

ii. Concerns about use of the B1122 (Rail-Led strategy):

Congestion is a major concern and we do not believe that the modelling gives sufficient weight to the impacts of traffic turning right; on-road parking and deliveries; slow and outsize vehicles such as refuse collection lorries, tractors and combine harvesters; breakdowns and accidents; horses and cyclists. We understand that weekends and holiday periods have been excluded from the traffic modelling generally, and note with interest the response received by Kelsale cum Carlton Parish Council from the Department of Transport, which iterated that it would be good practice for this to be included if the area was known for tourism.

The traffic levels proposed will bring unacceptable risks to those living along the B1122, many of whom have low visibility vehicular access to their properties. There are many dangerous junctions and entrances along the entire length of the B1122. Currently parts of the road are used on foot, thanks to the low levels of current traffic but the proposed levels may make this impossible. The traffic planned under the 'Rail-led' strategy for the B1122 will endanger pedestrians and will make using even the limited footpaths risky and intimidating.

The population along the B1122 is older than average and includes the residents of two retirement homes. Health impacts are especially important given this vulnerable group. We note that EDF has

yet to conduct a Health Impact Assessment. EDF must take into account the very latest studies including the effects of both noise and pollution on the incidence of dementia, Parkinson's disease, multiple sclerosis, myocardial infarction (heart attacks), pre-eclampsia and pregnancy-induced hypertensive disorders.

Many properties along the B1122 will suffer vibration damage, especially the older (mostly listed) properties with little or no foundations. EDF has not yet stated how it proposes to mitigate this and compensate owners.

We are very disappointed that, despite the concerns raised at Stages 1 and 2, under 'Rail-led' the emergency and evacuation route for Sizewell C & D – and presumably A and B – would remain the B1122. Given the road's inevitable congestion, this is a disaster waiting to happen.

iii. Alternatives:

Considering the vital importance of the issue and its implications for local people, we do not accept the cursory analysis of alternative routes to the Link Road/ByPass contained in the five pages of Chapter 10 of the Development Proposals. The joint Councils and our MP encouraged EDF to take the D2 (W) seriously after Stage 2 consultations, but we do not consider EDF to have properly done this. The route of D2/W passes within 250 metres of only 3 properties - a fraction of the 35 that are the same distance from the Link Road/ByPass, and is at least 500 metres from the listed buildings named in EDF's documents. There are at least as many listed buildings on the Link Road/ByPass route, many of which are much closer to the road. In terms of road safety, the AECOM study estimated that using the alternative D2 route would save a net 103 accidents, and 158 injuries and fatalities⁴ compared to using the B1122.

Transport issues can be considered one of the key issues for a coordinated approach with other energy projects. EDF will be aware of SCC and SCDC's letter to them and other developers (2 August 2018) following their meeting with Claire Perry, Minister of State at the Department for Business, Energy and Industrial Strategy (BEIS), which stated: *"the Minister... emphasised the importance of taking in combination all energy-related proposals under a single planning regime as NSIPs..."* and *"urged the local authorities write to all businesses involved, setting out her expectation that we should work together to consider these matters carefully, in order to find the best solution to the issues."* Route W has more strategic potential when Sizewell C & D is viewed alongside the renewable energy projects proposed. The Link Road/ByPass has no strategic or long-term value.

We oppose construction of Sizewell C & D starting before the necessary infrastructure is in place.

iv. Other transport concerns

Site Entrance congestion: EDF fails to provide peak daily traffic estimates for the main site entrance (let alone the busiest hour on the busiest day) where traffic will be highest, and the worst congestion, pollution and greatest inconvenience to other road users is likely to occur. We consider that peak daily traffic is likely to double current traffic flow at this location and peak hour traffic between 7 and 9 am is likely to be much more than double current peak hour flow. We estimate up to 6,470 Sizewell vehicle movements (including 1,500 HGVs) will use it per day, as will a forecast 6,800 passing non-Sizewell vehicles at peak, and question whether significant queues will build up.

Rat Running: Around Hinkley, rat-running on country lanes and congestion in villages from flyparking

⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/141211-Sizewell-Study-REVH-final.pdf> (Table 7: Accident costs and benefits, page 8)

by workers have become serious problems. EDF are doing nothing to prevent this here. The B1125 through Blythburgh, Westleton and Middleton will be especially affected by rat-running and flyparking is likely to be a serious issue in Leiston and surrounding villages.

A12: The A12 has considerable challenges and likely to be a cause of major disruption to communities far afield, carrying - potentially - up to 10 million tonnes of materials. It has numerous pinch points which Parish Councils along its length have pointed out. As well as the 2 villages bypass proposed by EDF, the project should not go ahead unless this is extended to all four villages. It would also make a lot of sense for the dual carriageway beyond Friday Street to connect to the D2/W route to the site to make traffic flow as smoothly as possible. Other two lane sections of road around Woodbridge that suffer regular queueing at peak periods and the Melton bypass which would also benefit from widening.

Park & Ride: We support the concerns of Darsham residents about the impact of the Park & Ride, including on the community's dark skies designation.

Public Rights of Way: The plans for the Link road and bypass seem to suggest a number of public footpath closures or 'at grade' crossings of the proposed new road. TEAGS objects strongly to both permanent footpath closures and 'at grade' crossings, because people will simply stop using what are often treasured and historic routes and an important component of the visitor economy. EDF needs to give consideration to building accessible footpath flyovers at strategic locations where the most important routes can be joined together. Local communities and The Ramblers need to be invited to contribute to such plans. The plans for rail crossings also need similar careful consideration and avoidance of public footpath closures.

We fully endorse the B1122 Action Group's response on these matters.

6. PEOPLE AND ECONOMY

i. Community Impacts:

Whilst we welcome the principle that Sizewell could bring benefits to the area, in reality, for many residents there is little prospect of direct benefits, whilst - critically - the cumulative *negative* impacts of the construction period on the local communities are woefully ignored in the Stage 3 documents, as they were at Stage 2.

We are concerned that EDF hasn't yet conducted vital studies including Health and Community impacts. As mentioned in transport, noise pollution is a real threat to health, causing heart disease, hypertension, hearing impairment, sleep disturbance, dementia. People living close to the site, let alone visitors, will be seriously affected. It is difficult to imagine effective mitigation, and so EDF must do much more to remove the causes of additional noise pollution in the first place, from traffic, its preferred siting of the campus and quarrying.

We learned at Hinkley Point that noise monitors were badly sited and managed, with EDF taking months to move or repair them. Double glazing only works when the windows are kept closed; not something those who live in rural villages are in the habit of doing all year round. Local people told us that ambient noise pre-construction was about 35db - and told us the day-time limit is supposed to be 65db, night-time 42db, but these are averaged out, so intermittent noise peaks (caused by pile drivers etc) in excess of these don't necessarily take the average over the limits. 30 people have taken up free state-of-the-art noise cancelling earplugs from EDF; as with double-glazing these are not entirely compatible with the pursuit of everyday activities. We are dismayed that no noise

reference readings have been taken in Eastbridge - the quietest area within 260 metres of the borrow pit workings. Daytime noise maxima in Eastbridge should not exceed 60db LAmax and night-time 38dB LAmax.

All site lighting should be kept as low to the ground as possible and not suspended from high cranes or used to light up cranes except for operators ascending to avoid wider light pollution. In all cases directional LED lighting should be used to avoid night-time light spill outside of the site.

There must be no impact on locals' access to emergency services and healthcare. We are concerned that local health services – GPs, nurses, hospitals - are already overstretched, and will not be able to cope with the potential demand from construction site workers. Parts of Suffolk Coastal have some of the slowest response rates in the country for ambulance services, and unless there are significant changes this seems likely to get much worse.⁵ Leiston Surgery is oversubscribed, and the practice struggles to recruit sufficient GPs – a nationwide problem. Much more information is needed on what provisions EDF will make to cater for its workers. On-site nursing support would not be able to cope with more serious illness and injury. Appropriate facilities to look after a peak workforce of at least 5,600 must be in place *before* construction begins.

Community cohesion will suffer: the proposed Sizewell Link Road will split parishes, cut off homes and farmhouses from village centres, close well used country roads and footpaths and make farms unviable. Many of the residents of this parish are retired, and a high percentage of these are also elderly, and feel vulnerable, given the proximity of the campus and the anticipated traffic nearby. They have concerns about how the build will affect their day to day lives, including access to basic services. For example we learned at Hinkley Point that people were no longer able to use their local Post Office because it was no longer possible to park within the village.

EDF states that the experience at Hinkley Point shows that many non-home-based workers have a preference for houses of multiple occupancy (HMO) private rentals close to the site, and that Leiston, Saxmundham and Aldeburgh are expected to be popular locations. We were informed of this preference by local people in Somerset, who observed that this had caused considerable problems when three or four workers, each with their own vehicle, occupy a property that has parking for one or at most two vehicles. Some narrow streets in the above-mentioned towns are likely to become totally blocked by fly-parking unless it is rigidly controlled. At Hinkley Point this was contributing to inter-community tensions, where some residents in local villages had let either their whole properties or rooms out to workers, resulting in congestion and fly-parking. Where these problems are not addressed, animosity has set in.

Across the parish, and in the wider community, stress over the proposed development and local impact is already a significant factor in people's health and wellbeing. The impacts on the local environment will mean changes to our way of life, our leisure activities and our well-being.

Worker behaviour, even with a Code of Conduct, is inevitably a major concern, not without foundation. Local police support has been reduced, and the police station at Leiston (the town closest and which suffered from poor worker behaviour at Sizewell B construction) is now closed. What, in practical and financial terms, will EDF do to ensure sufficient police and emergency provision, and effectively enforce the Code externally as well as at the site gates? What is meant by 'appropriate resources'? And how much evidence has so far been gained about the effectiveness of the Code, from Hinkley Point, given that the campuses have only been operating a few months? The

⁵ <https://www.bbc.co.uk/news/health-47362797>

development of a Community Safety Management Plan and the Worker Code of Conduct will be especially important to local communities following the experience of the Sizewell B development. How will this be delivered and funded?

ii. Economic Impacts, including on Tourism

Suffolk Coastal has some of the lowest levels of unemployment in the country. Office of National Statistics⁶ figures show only around 1,700 unemployed, with only 280 people claiming job seekers' allowance. Some of the figures simply said "sample size too small to be statistically reliable". We concur with the views expressed at Suffolk County Council's Cabinet meeting, that the project will simply poach those employed in other sectors, impacting services struggling to retain employees, such as carers and nursing staff, which may be particularly acute post Brexit.

We understand from press reports that EDF proposes to save 20% compared to the cost of building Hinkley Point, in part by using the Hinkley supply chain. This also explains why EDF is in a rush, needing a swift follow on at Sizewell from the Hinkley build. We ask how the use of the Hinkley Supply Chain will affect the economic and employment benefits that the area is being promised? EDF's Stage 3 document merely says "We are also working with our partners to identify how the local supply chain can secure a comparable level of involvement to that experienced at Hinkley Point C." Is it right to compare the socio economics of the Sizewell C & D project to the Hinkley C project? They are different places, on opposite sides of the country with different local economies and environmental issues. Leiston is not an affluent community following the construction of Sizewell A and B. What does EDF propose to do to bring more long-term prosperity to Leiston specifically?

We further note that apprenticeships will be based in the SW of England: "the apprentices will study at either the University of the West of England or the University of Exeter and gain work experience at Hinkley Point C. Once they have completed their apprenticeship they will begin work on Sizewell C & D. What opportunities will be available for apprentices to study in Suffolk?

Local livelihoods will certainly be affected, including farming. There is considerable land take for the project, and as mentioned above, the Link Road will divide some farms and render them unviable. Blight is another serious concern, exacerbated by the extended period of uncertainty, and further contributes to the break up of communities. At Hinkley we were told the nearest hamlet (Shurton) has lost 12 out of 52 households, with the main cause being concern about noise/disruption.

Conversely, home rental costs will be expected to rise, potentially pricing young families out of the rental market. In Bridgwater they have increased by 18% in 2018 according to the BBC's Spotlight South West report in September 2018. We note that EDF had to pay Sedgemoor district council £400,000 in compensation⁷ in early 2018 after the number of workers in local communities exceeded agreed limits. Whilst we welcome EDF's proposal to create a Community Fund, a Tourism Fund and a Housing Fund, it is not transparently clear how they would function.

We are concerned that the housing fund that EDF are proposing, as well as trying to bring unoccupied housing back into use, is specifically targeted at encouraging and bringing more HMOs into the market. It is the surge in HMOs in and around Hinkley point that is causing significant parking issues in Bridgwater and the outlying villages and has also contributed to the increase in rental prices in the area.

⁶ <https://www.nomisweb.co.uk/reports/lmp/la/1946157244/report.aspx>

⁷ http://www.bridgwatermercury.co.uk/news/16052694.EDF_forced_to_pay_440_000_to_council_after_more_workers_than_allowed_move_to_village/

We believe the local tourism industry will be hit hard. Noise, dust, loss of access and visual impacts will deter visitors to the coast and its rural hinterland in the whole area between Southwold and Aldeburgh. EDF has not provided enough information about impacts on tourism, and has made no effort to present its promised (but unconvincing) economic gains as a net figure, taking into account economic losses in other sectors.

According to the Joint Councils' Stage 3 response, from their Volume and Value Study for all of Suffolk (2017 data), "it is estimated that the total value of tourism is £2.03bn, with 42,118 tourism related jobs accounting for 13.5% of all employment (far higher than the EDF Energy stated estimate of 9.6%). Given these figures from our Volume and Value study, the Councils do not agree with the statement in EDF Energy's Stage 3 consultation that the tourism economy is 'notoriously difficult to define' in terms of volume and value."⁸ Research in 2017 in the AONB itself valued it at just over £210 million/year, supporting 4,655 tourism-related jobs.⁹

The qualities that draw people to Suffolk, as identified in Suffolk's *Nature Strategy* include peace, tranquillity and landscape and states that visitor experiences must 'match and surpass expectations'. RSPB's flagship reserve at Minsmere draws 120,000 visitors a year, and its "Love Minsmere" campaign at the time of writing has over almost 18,000 supporters. The wild coastline, the dark night skies and mosaic of open heathland, woodland, marsh and farmland offer a rich variety of experiences. The deep quiet, the wildlife, lack of pollution, the visual amenity all draw visitors here, many of whom visit several times a year, and stay for several days. Ecotourism is on the rise. We believe tourism in and around this parish, to Minsmere and to the Heritage Coast, will be unnecessarily affected by EDF's current plans for the siting of the campus, borrow pits and spoil heaps, and by its transport proposals.

Local hotels, holiday lets, B&Bs and caravan parks may lose significant business for 10-12 years as visitors are deterred by the construction. Visitor patterns, once shifted to other destinations, will be hard to recover – it has taken significant investment, time and effort to build up a thriving year-round tourist trade to this special coastal area, which would have to be undertaken all over again.

Visual impacts of the project will also deter visitors. The 2011 National Policy Statement for Nuclear EN-6 document specifically mentions "the potential for long-term effects on visual amenity at Sizewell, given the Suffolk Coast and Heaths Area of Outstanding Natural Beauty"¹⁰ The visual impacts of the two reactors themselves, far uglier than Sizewell B and much closer to Minsmere and Dunwich Heath and therefore more intrusive, the four new enormous pylons and other infrastructure and the accommodation campus will be considerable and cannot be mitigated or compensated for.

Footpaths and bridleways crisscross this area and are widely used by locals and visitors alike. Noise, dust and visual impacts both to the north and south will deter tourism to Minsmere, Dunwich, Thorpeness and Aldeburgh. Public access through Sizewell Belts to the foreshore will be blocked completely during construction, as well as access to the beach, affecting Sizewell ParkRun. We share others' concerns that unsympathetic behaviour by construction workers in the countryside could damage special habitats and associated wildlife, and spoil visitors' enjoyment.

The massive increase in traffic in the area, and for much of the A12 between Ipswich and Lowestoft, will deter visitors to the area. Congestion and delays will also affect specific cultural activities, such as the world-renowned annual Aldeburgh music festival at Snape, the Southwold literary festival etc.

⁸ Para 168 of the Joint Councils' Appendix, Stage 3 response

⁹ <http://www.suffolkcoastandheaths.org/assets/About-Us/2017-Economic-Impact-of-Tourism-Suffolk-Coast-Heaths-AONB.pdf>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volumel.pdf, Para 3.10.3

Interest could be affected by the perception (if not the reality of) lack of accommodation, general disturbance, a reduction of quality of life and severe traffic problems.

7. COMMENTS ON THE CONSULTATION PROCESS

Sizewell C & D is a Nationally Significant Infrastructure Project. We do not consider that EDF's consultations have been detailed enough for a project of this importance, with little evidence that they have listened to the concerns of local people, Councils or Groups, or that the company genuinely appreciates the challenges this location presents and its responsibility to protect it.

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.

EDF decided a marine-led strategy was impossible far too late in the process, and therefore presented new roads and massive traffic increases at the very last stage of public consultation, resulting in considerable shock and reducing the value of any feedback. EDF admits that its 'Rail-Led' strategy may not be feasible, which undermines the consultation process. As mentioned above, EDF's dismissal of other road routes was too hasty, and whilst there was an attempt to provide comparisons between routes, there was no such attempt to consider the impacts of alternative accommodation proposals. This denies the public the ability to respond in an informed manner, resulting in an inadequate consultation process.

At our meeting with EDF representatives in September 2018, including Chief Executive Simone Rossi and Nuclear Development Managing Director Humphrey Cadoux-Hudson, we stressed the importance of not only fully justifying EDF's specific proposals, but explaining the reasons for rejecting others. We came away from that meeting under the impression that this point had been taken on board, and are deeply disappointed to find that we were mistaken.

Relating to the exhibitions, EDF angered parish councils with its secretive approach to booking village halls. As at previous stages, and despite suggestions, the model on display does not show the 10-12 year construction phase, nor feature new additions to the power station such as the chimney stacks and 65 metre pylons. Meanwhile EDF's computer-generated videos - shown the exhibitions and later made available online - were over-simplistic and misleading - for example showing very few cranes. The documents use outdated aerial maps from 2004/07, despite 2016 maps being available. The overall impression given is that the consultation was badly resourced and done 'on the cheap'.

We note that EDF did not make information available to Scottish Power Renewables, so that SPR's Phase 4 consultations quote out of date Stage 2 information about EDF's project. This suggests very poor levels of communication and cooperation between these two projects, which does not bode well for Suffolk in the future.

8. CONCLUSIONS

TEAGS is dismayed that EDF has not substantially addressed a number of the concerns of this and neighbouring parishes voiced since Stages 1 and 2 or, where circumstances have changed - for example with EDF's preferred transport strategy having been abandoned - imposed "solutions" that we are opposed to. This is now the final stage of Public consultations and there are too many questions unanswered, details missing and problems not addressed.

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.

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. **Given (especially) the environmental concerns and the opposition to EDF's road strategy, EDF should add a further stage of consultation in order to present revised proposals.**

We observe that residents near Hinkley Point are suffering considerable disruption despite that location's relative advantages over this in terms of existing infrastructure to support delivery: Suffolk has no motorway and there will be no jetty.

Finally, as previously stated, we are concerned that the dual reactor project is simply too big for the space available. Two reactors are being shoehorned into 32 hectares against an NPS EN-6 expectation of 30 hectares for a single reactor. In order to make a site of 32 hectares available, over 5.5 hectares of SSSI land will be lost forever and a variety of SZB buildings moved, destroying the greater part of Coronation Wood and Pill Box field. Four 65 metre pylons to carry cables from the turbine generators to the National Grid substation have been added, to replace underground cables due to lack of space. Additionally the Hard Coastal Sea Defence is incomplete as it stops over 3 metres above mean low spring tide, despite reaching out as far as the rear of the existing sacrificial dune.

The sheer size of this project will damage a vast swathe of AONB land, destroying existing habitats threatening the integrity of the AONB and potentially damaging both Sizewell Marsh SSSI and Minsmere-Walberswick Marsh and Heaths SSSI. EDF must rethink the scale of this project.