



RESPONSE TO EDF'S STAGE 4 CONSULTATION ON SIZEWELL C & D THEBERTON AND EASTBRIDGE ACTION GROUP ON SIZEWELL (TEAGS)

27 September 2019



Concerned residents packed Theberton Church for our Public Meeting on 14 September

A. INTRODUCTION

This response to EDF's Stage 4 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 by a joint meeting with Theberton & Eastbridge Parish Council on 14 September in St. Peter's Church.

As previously stated, TEAGS is not in principle opposed to a new nuclear power station at Sizewell. However we, and the local residents we represent, are deeply concerned that EDF's construction proposals for such a large project of 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, to resolve issues surrounding the coastal defence works, the very constrained platform area which is dictating unacceptable changes in grid connection, our quality of life and be the good neighbour it aspires to be.

This response will briefly reiterate our most pressing issues from previous consultations as well as

address the new proposals within the Stage 4 consultation documents in more detail and also some of the wider issues of concern relating to people, the environment and the economy.

Our Stage 3 response is attached as Annexe 1 to this document and still reflects our position and opinion on the broader range of issues and questions raised at that time. Where Stage 4 has addressed or expanded upon proposals consulted on at Stage 3, the responses in the main sections of this document should be seen as refinements to our position and opinion. Where new proposals have been made that impact upon the residents of Theberton and Eastbridge or on the environment of the surrounding area, we will express our position or opinion on those proposals.

As stated above we remain unconvinced that sufficient space is available to safely create a dual reactor development at Sizewell, given the changes in platform safety requirements following the Fukushima accident and the constraints that Sizewell Marsh Site of Special Scientific Interest (SSSI), the fragile Suffolk Heritage Coast, the neighbouring Minsmere and Walberswick SSSI, and changes due to global warming place on this development. We consider it significant that the Environment Agency has warned EDF, in its Stage 3 consultation response, not to expect that license applications submitted for the Hinkley Point development will be sufficient or acceptable for a development here on the very different Suffolk Coast.

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. These consultations seem designed to only focus on those items of interest to EDF in its relentless pursuit of an inappropriate Hinkley Point C “project replication” as quickly as possible, in order to be able to transfer skilled workers to Sizewell from Hinkley as they become available.

We note the delays and cost increases at Hinkley Point with concern, and their implications for Sizewell, showing that the schedule for Sizewell is wholly dependent on the schedule for Hinkley, adding yet more uncertainty, especially as further delays at Hinkley could not be ruled out.

B. OVERALL VIEWS

We are concerned that the small changes and additional proposals in this consultation stage have done nothing to improve considerations given to the unique environment surrounding Sizewell, and have failed to react to the concerns expressed by TEAGS at all three previous stages of consultation. We remain firmly of the view that the construction will damage the things that make this part of Suffolk so special; peace, tranquility and dark night skies. It is easy to be a ‘good neighbour’ when all you are doing is operating an existing nuclear power station. Constructing two new power stations, thereby separating two SSSIs, splitting the AONB in two with a massive construction site, disturbing the habitats of numerous protected species, closing footpaths and beaches and disrupting the thriving tourist economy for 10 - 12 years will not be seen as neighbourly.

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 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, 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. 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, 2 and 3 not considered in Stage 4:

- 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, 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 Suffolk Coast Destination Management Organisation’s report published on 25 September demonstrated that these concerns are not unfounded.
- 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.
- EDF’s abandoning of a marine-led transport strategy due to concerns with coastal erosion and sediment transport to the south of the site and other environmental issues was not decided until late in the planning process, after 2 stages of consultation, and has led to significant increases in predicted traffic.
- 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.
- 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 great hurry - to cram two consultations into less than 9 months, the second over the summer and at short notice (we acknowledge legal notice was given but the summer is a time when people have long-standing and significant personal plans) - lead us to believe that saving time and money is taking precedence over the impacts on people and the environment.

Our additional concerns with the content of Stage 4 are:

- EDF stated that these consultations were held in response to requests from local people, but the content fell far short of what those seeking a fourth stage of consultation were expecting or hoping for.
- EDF’s proposed transport strategies - all three of which are “road led” will put between 700 and 1150 HGVs a day on the area’s roads, carrying up to 10 million tonnes of material. The ‘Integrated’

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

strategy (more accurately a 'Hybrid' strategy) is much closer in impact to the 'Road-Led' strategy than the "'Rail-Led' strategy.

- EDF's uncertainty that the 'Rail-led' option is viable seems to have increased. EDF's lack of faith in Network Rail is demonstrated by the proposal to include the Saxmundham to Leiston branch line as part of the extended site, in order for EDF to manage this part of any development to ensure it is available in a timely fashion.
- EDF appears to be determined to impose the Sizewell Link Road/Bypass upon us, reducing by a limited degree the enormous impact of high levels of HGV, LGV and Bus traffic while scarring the landscape with multiple cuttings and embankments. EDF ignores the fact that it will leave no legacy unlike the D2/W route. The County Council's hesitation in committing to adopt the road, and EDF's new option for it to be removed, demonstrates that it has no significant legacy value.
- 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 the D2/W route is too cursory. We note with interest that the County Council does not consider EDF's 'secret' independent study on road routes to have provided conclusive evidence that Z is better than W, and note EDF's refusal to open the study to public scrutiny.
- The options of 4 Pylons of variable height, or 5 pylons at reduced height of about 50 metres do not disguise the fact that the platform itself is not large enough to accommodate the twin reactor installation in a sensitive manner, considering the location close to two SSSI sites, AONB and Heritage Coast. Suffolk Councils and the AONB share our opposition to these pylons.
- EDF has still not made any proposals that show the site can be built with an adequate coastal defence structure, which from Stage 3 documents finishes 3.5 metres above mean spring low tide mark and would result in the defence being undermined. There are still grave concerns regarding the impact of coastal defences and the beach landing facility on coastal processes.
- Additional Marsh Harrier foraging areas are proposed, one of which would remove a well used tourist camping field and a field used for overwintering the Eastbridge Farm Simmental herd from use. EDF has already converted some of its estate from arable to potential Marsh Harrier foraging land but has no supporting evidence that this has increased the frequency of Marsh Harrier foraging visits.
- Additional land has been identified as compensation for fen meadow that will be lost due to the development but it requires preparation, will not be available prior to the proposed commencement of the works and is 4 miles from the affected area.
- 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.

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.

C. 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 Heath 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.

There are a number of new proposals and options surrounding compensation and mitigation for habitat losses associated with both the permanent development and 10 -12 year construction period.

It should also be noted that although the construction period is 10 - 12 years, restoration and development of the proposed acid grassland and lowland heath proposed at the end of the development may take a further decade or more to become 'naturalised'. We are concerned that compensation habitat for fen meadow, situated in the Fromus Valley and/or Blyth Valley has yet to be created and we are sceptical that this can be created and be functional before the fen meadow is lost at the Sizewell C site. It is also separated by 4 to 8 miles of arable farmland with no natural corridor connecting with the original site at Sizewell.

Three optional sites of Marsh Harrier compensation/mitigation have been proposed, one of which is very close to the borrow pits, campus and spoil heap working areas. The other two are about 2 miles up the Minsmere Valley close to Westleton. EDF has already placed a number of arable fields within its existing estate to acid grassland with a stated intention of encouraging it to become lowland heath and thereby attracting increased Marsh Harrier foraging. EDF has provided no survey data that shows that the current fields are showing increased Marsh Harrier activity as a result of the changed habitat. These are also very close to the same proposed borrow pits and the overall construction site. Even if survey data shows some increase in foraging activity, these fields may yet prove unsuitable due to their proximity to the construction site. So without any survey evidence for successful increases in Marsh Harrier foraging on the existing sites, it is difficult to see these proposals as proper compensation or mitigation for the loss of habitat due to the construction of Sizewell C.

The proposed Marsh Harrier foraging compensation site at Eastbridge utilises a successful certificated campsite field at Eastbridge Farm which is used by tourists and organisations running Duke of Edinburgh Award Schemes. In the past year, some 2000 people have stayed at the site and the campers who use the site come for its proximity to Minsmere Nature Reserve and contribute to the Eastbridge community by making regular use of The Eel's Foot Inn. Another of the fields is used to overwinter Eastbridge Farm's award-winning Simmental herd which is directly connected to the farmyard, and its loss would make managing the herd much more difficult. It is surprising that such an ill-informed proposal has been made, and should be rejected.

EDF has introduced two options for the new pylons at the site, replacing the installation of this infrastructure underground due to insufficient space on the 32 hectare platform. The first has a reduction of three of the pylons to just under 50 metres and one 65-metre high pylon, the second has five pylons all at just under 50 metres. We are opposed to both of these options as they will negatively impact the AONB landscape and Heritage Coast. We are of the opinion that 32 hectares is too small for a dual reactor installation, and this is evidenced by the introduction of these pylons, and the fact that the hard coastal defence is also inadequate as currently proposed (see section 2 above).

We note the recommendations of the Landscapes Review to DEFRA on 21 September 2019. The panel proposes that AONBs (renamed National Landscapes) are accorded statutory consultee status. The panel also highlights that the duty of "regard" for AONBs in planning matters is too weak. We urge EDF to review the Suffolk Coast & Heaths AONB's responses to Stages 1 - 4 and re-consider these responses as though received from a statutory consultee.

We fully endorse the responses of the Minsmere Levels Stakeholders' Group, AONB Partnership and RSPB on these issues.

D. ACCOMMODATION STRATEGY

Our view of the single campus at the entrance to the construction site has not changed. We still believe that a split campus with some level of legacy, as at Bridgwater, would be a much better approach more in keeping with being a 'good neighbour'. Our comments at Stage 3 remain valid.

EDF propose a 2,400 bed space campus at Eastbridge Lane and a 400 space caravan site at the Land East of Eastlands Industrial Estate that will house approximately 600 workers for the duration of the construction, making a total of 3,000 bed spaces at peak of construction. However, when the 7,900 worker numbers are looked at in the Stage 3 documents, the additional 2,300 workers have no additional accommodation being provided through EDF's campus and caravan site and it is expected that this will all be provided through the local rental and housing sectors or by additional caravan pitches becoming available in the local area, along with an associated increase in traffic impacts.

We are concerned at the increase in peak worker numbers modelled at 7,900 workers (as opposed to 5,600 workers discussed in Stage 2); these numbers were present at Stage 3 but have more emphasis at Stage 4. Whilst we welcome the 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."

E. TRANSPORT PROPOSALS

Small changes have been made to the overall "busiest day" estimates of HGV movements, but the main changes are the introduction of the so-called "integrated" strategy - which we prefer to call a "hybrid" strategy and further evidence that the "rail-led" is increasingly seen as an unlikely deliverable through network rail.

We welcome the fact that EDF accepted the need for a direct access route. This consultation included some very limited consideration of some of the criticisms of the Sizewell Link Road. We still believe the route being chosen is the wrong route as it leaves no legacy and indeed the offer to remove it altogether at the end of the construction period just confirms that criticism in our Stage 3 response.

In our Stage 3 response we criticised the descriptions of the two proposed strategies as 'Rail-Led' vs 'Road-Led' to be misleading, since both use mainly road. Stage 4 does not address these criticisms but introduces a third road-based strategy which includes three trains (six movements) per day. Whilst we would of course favour of as much freight as possible being delivered by rail, EDF's inclusion of the Saxmundham/Leiston branch line within the site definition shows that delivery of the required rail improvements by Network Rail are not considered to be feasible within the timescales defined by EDF's stated construction schedule. Our arguments in favour of a direct access route stand regardless of whether there are two, three or five trains a day. We do not accept that the B1122 can carry 700, 1,000 or 1,150 HGV movements per day in addition to all the other traffic that EDF wants, doubling the traffic level at the site entrance compared to no Sizewell C. This will bring unacceptable increases in accidents, pollution, noise and congestion.

i. Link Road/Theberton Bypass

Our opposition to EDF's proposed Link Road/Theberton Bypass route remains the same as detailed in our Stage 3 response. Our preferred option remains a link from the A12, south of Saxmundham, to the B1122, northwest of the proposed site entrance, at a similar position to the proposed junction of the proposed Sizewell Link Road and B1122.

However, If the Sizewell Link Road proceeds against our wishes, it will be essential that;

- That a bridge is provided in order to keep Pretty Road open to vehicles so that the community can continue to have a direct route into Saxmundham and Leiston and thus avoid being kettled in by the difficulties in entering the bypass and driving across the main site entrance. It is vital for all residents that they maintain easy access to the vital doctor and dental services as well as the shops in both towns on which they are completely dependent. It will also enable members of our community on the “wrong” side of the Link Road to remain connected without having to navigate HGVs.
- During “early years” use of the B1122 several of the bends near Middleton Moor and the junction near Mill Street should still be improved to cope with the two years of heavy traffic along this route.
- It is unacceptable for any transport strategy to be considered for extended hours of operation.

ii. Concerns about the use of the B1122 (Rail-Led strategy): No changes to our response at Stage 3.

iii. Alternatives:

Our Stage 3 response remains valid and, despite the inclusion of an ‘integrated’ strategy, we remain opposed to construction of Sizewell C & D starting before the necessary infrastructure is in place.

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.

iv. Other transport concerns

Site Entrance congestion: There are no significant changes to our response at Stage 3 as traffic increases at the entrance will still be approximately double that experienced without the Sizewell C development.

Rat Running: There are no changes to our response at Stage 3.

A12: There are no changes to our response at Stage 3. However we note that there appears to be no consideration of the subsidence on the A12 at the Blythburgh causeway in EDF’s transport plans.

Park & Ride: There are no changes to our response at Stage 3.

Public Rights of Way: The Sizewell C project would have a substantial impact on local Public Rights of Way across the entire development site stretching from Ipswich in the south, Darsham in the north to the construction site at Sizewell. Most are used by local people and visiting walkers; some are strategic long distance paths and bridleways. Our flourishing visitor economy currently benefits from the popular Suffolk Coast Path, the Sanderlings Walk, the England Coast Path and Sustrans routes; many of these are proposed to be diverted and re-aligned, at least for the 10-12 year construction period. Bridleway 19 will be closed during construction and diverted along Lovers Lane, the B1122 and Eastbridge Road for that period. EDF does plan to improve cycling and walking to the site through its Cycling and Walking Travel Plan but will need to show evidence that this will be maintained, resourced and managed to show any benefit during lengthy construction and beyond.

The proposed new and adapted roads and rail options would impact many other traditional Rights of Way. EDF will need to negotiate closure, diversion and stopping up orders with the County Council and it is essential that this is done in consultation with local people, the AONB, the Ramblers, Parish Councils and District Council. The narrative regarding Rights of Way in Stage 3 and 4 consultation documents does not illustrate that this work has been done sensitively and thoroughly throughout the area; it is important that rights of way are not simply 'stopped up' and replaced by poorly routed alternatives. If this means additional investment in new infrastructure such as footbridges across roads and railways EDF needs to justify why such correct options are not being pursued.

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

F. PEOPLE AND ECONOMY

i. Community Impacts:

We are still waiting for a Community Impact Assessment. We consider it unreasonable to leave such an important study to DCO. There are no significant changes to our response at Stage 3.

ii. Economic Impacts, including on Tourism

The response at Stage 3 is still valid but we would add the following observations;

Of the four impact scenarios looked at by Hardisty Jones Associates in their report published in November 2018, two flagged up the prospect of significantly less economic impact (the more negative scenario and the Cumulative scenario with other energy projects) than EDF's "baseline". This report also highlighted that - under all scenarios - EDF's baseline target for local employment was "ambitious", that there would be displacement of workers from other businesses, and that local people were more likely to be in lower-paid less-skilled jobs.

This report drew on analysis of both the Sizewell B construction project and other large infrastructure projects, which shows that local employment and upskilling is marginal. The majority of local employment tends to be at the low-skill end of the employment spectrum, which occurs at the beginning of the project during groundworks and civil engineering, or longer term into security and support functions, such as campus support and Park and Ride bus drivers. During Sizewell B unemployment levels exceeded those in evidence today, leading us to believe that there will be increased "poaching" of staff employed in the existing local economy during the construction of Sizewell C. We are concerned that public services like health and social care will be significantly affected.

As well as having to recruit and train new employees to replace those lost to EDF, tourism and other local businesses will be badly hit by the decade-long traffic congestion associated with the construction project, further hurting their competitiveness. The Suffolk Coast DMO's survey and study on tourism published 25 September has concluded that losses to the vital local tourism sector could amount to £40 million a year and could cost 400 jobs as a result of the energy projects planned for the area.

Furthermore we consider that EDF's use of the figure of 8,500 workers in Stage 4 documents gives an inflated impression of the economic benefits of Sizewell C. In our recent meeting, EDF confirmed that the purpose of these figures was to align worker numbers with increased transport numbers in order "stress-test" the mitigation. However the Stage 4 summary document (page 20) clearly states "The benefits of Sizewell C **will** include: up to 8,500 workers." This is misleading at best.

Stage 3 figures show that non home-based workers are expected to be 3,585 (out of 5,600) or 64% of the total workforce at peak employment and home based workers will be drawn from a significant radius (90 minutes travelling time). Feedback received by local people at Hinkley Point indicates that pressure is being exerted on local housing as more workers are apparently unwilling to travel 90

minutes. As a result, workers are renting closer to the site and increasing pressure on the housing market. This shows that the actual potential for local employment is less than the 36% claimed in Stage 3 documents, reinforcing EDF's wish to use the Hinkley Point skilled workforce.

We note an Oxford Economics study of the economic impact of Sellafield² in June 2017 found that, despite Sellafield's annual £2 billion GVA contribution and 11,000 employees, where there is a low level of specialist skills locally, direct labour costs and supply chain 'spend' inevitably flows out of the local economy. Furthermore, while major companies in the supply chain might open offices close to site, the real value accrues to their national headquarters or regional offices which are based elsewhere.

G. COMMENTS ON THE CONSULTATION PROCESS

We consider Stage 4 consultations to have been rushed and inappropriately timed to take place largely over the school holidays when many people are away or have greater childcare commitments. We understand that EDF had reduced engagement at its exhibitions and we sincerely hope EDF will not interpret this as apathy about the project.

We consider it to have been grossly negligent of EDF not to exhibit in communities that will be substantially affected by the project, whether there were significant changes proposed under Stage 4 or not, including Theberton and Eastbridge. It would have demonstrated a greater commitment on EDF's part to "being a good neighbour" to bring its materials to the parish and explain to locals face to face why there were not more significant changes at Stage 4.

As we stated at Stage 3, as 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.

The other comments regarding the consultation at Stage 3 remain valid and when calling for a further consultation it was in the expectation that EDF would come forward with more information about the work being done to back up its decisions and choices throughout the consultation process. However, quickly became evident that this Stage 4 consultation was never going to be about meeting the requests and wishes of the local communities for more detailed information, preliminary environmental information and rationales for rejecting various options.

In place of a true dialogue, we are told that all of this information will be available at the Development Consent Order process, when we will have barely 6 months to evaluate what has taken a minimum of 7 years for EDF to accumulate using teams of full time employees and paid consultants.

We understand the nature of the National Strategic Infrastructure Project process and that the definition of what should be included by a prospective developer in the pre-application consultation stages is so empty as to not constitute any level of expectation whatsoever. However, we observe that other project developers have been much more open and genuinely "consultative" in their approach. We have been continually disappointed in this process with EDF and unfortunately have realised that the experiences voiced by groups at Hinkley Point are being realised here at Sizewell C once again.

In the same way that EDF keeps telling us that it is learning from their experiences at Hinkley Point, Flamanville and others, we are finding that we are also experiencing the same level of dismissal and "box-ticking" consultation exercises, where listening apparently goes on but very little action to be a 'good neighbour' ends up being evidenced in practice.

² <https://www.gov.uk/government/publications/the-economic-impact-of-sellafield-ltd>

H. CONCLUSIONS

TEAGS remains dismayed that EDF has not substantially addressed a number of the concerns of this and neighbouring parishes voiced during and since Stages 1, 2 and 3.

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."

We are also aware of the strength of concern being expressed by the Environment Agency and 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. The lack of information provided throughout four stages of consultation has not been fit for purpose.

It is unacceptable to leave presenting all of the supporting environmental and impact assessment information until the DCO application as it makes a total mockery of what is billed as a "consultation". It is impossible to properly consult a community without presenting the rationale for proposing or rejecting options. EDF has said on several occasions that it does not wish to overload the community with information, but by leaving all of the information presentation to the Development Consent Order EDF will be knowingly overloading the community at the last possible moment.

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 still 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. Plans for underground cables to carry power from the turbine generators to the National Grid substation have been replaced by two unacceptable pylon options. Additionally the Hard Coastal Sea Defence remains incomplete as it stops 3.5 metres above mean low spring tide, despite reaching out as far as the rear of the existing sacrificial dune with no further explanation of how EDF propose to rectify this important long term safety structure. It is as well to remember that in EN-6, spent fuel from both Sizewell B and Sizewell C will remain on-site until at least 2130. This dangerous legacy and deferred removal is totally reliant on a Geological Disposal Facility being identified built at unknown cost and unknown availability. Having a very competent coastal defence that will cope with high level waste, spent fuel storage, decommissioned reactors and unknown climate change threats is essential and yet EDF cannot tell us how they will do this on our sinking coast that is constantly threatened by storm surges and coastal erosion.

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.

I. ANNEXE - Stage 3 Consultation Response from Theberton & Eastbridge Action Group on Sizewell, 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, Minster 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".³ 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.
- 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

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727628/NPS_Siting_Criteria_Consultation_-_Government_Response.pdf

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"⁴ 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.

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.

⁴ <https://utilityweek.co.uk/copying-and-pasting-hinkley-design-could-slash-nuclear-costs-says-edf/>

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.⁵ 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 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

⁵ Source: Natural England (2010)

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 Bridgewater - 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 fatalities⁶ 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

⁶ <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/141211-Sizewell-Study-REVH-final.pdf> (Table 7: Accident costs and benefits, page 8)

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 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 L_{Amax} and night-time 38dB L_{Amax}.

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.⁷ 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

⁷ <https://www.bbc.co.uk/news/health-47362797>

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 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 Statistics⁸ 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 opposites 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 compensation⁹ 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

⁸ <https://www.nomisweb.co.uk/reports/lmp/la/1946157244/report.aspx>

⁹ [http://www.bridgwatermercury.co.uk/news/16052694.EDF forced to pay 440 000 to council after more workers than allowed move to village/](http://www.bridgwatermercury.co.uk/news/16052694.EDF%20forced%20to%20pay%20440%20000%20to%20council%20after%20more%20workers%20than%20allowed%20move%20to%20village/)

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.

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."¹⁰ Research in 2017 in the AONB itself valued it at just over £210 million/year, supporting 4,655 tourism-related jobs.¹¹

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"¹² 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

¹⁰ Para 168 of the Joint Councils' Appendix, Stage 3 response

¹¹ <http://www.suffolkcoastandheaths.org/assets/About-Us/2017-Economic-Impact-of-Tourism-Suffolk-Coast-Heaths-AONB.pdf>

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volume1.pdf, Para 3.10.3

world-renowned annual Aldeburgh music festival at Snape, the Southwold literary festival etc. 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.