



SIZEWELL C DCO Briefing

This document outlines key issues in EDF's Sizewell C Development Consent Order (DCO) application. See end for What to Do & Deadlines.

EDF's application is to construct two EPR reactors between 2022 - 2034 assuming no delays, at a cost of £20 billion. EDF's documents show that it will take 6 years to offset 5.74m tonnes of CO2 from construction, so will not contribute to net zero until at least 2040.

General concerns:

- Construction will damage what makes 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 pollution, hurting tourism to the Area of Outstanding Natural Beauty (AONB).
- The build will threaten some of the most biodiverse habitats in the UK and Heritage Coast, including two Sites of Special Scientific Interest and Minsmere Reserve - a national treasure. It will be impossible to recover from the loss of habitats that host rare birds, animals and plants. The RSPB and Suffolk Wildlife Trust now oppose Sizewell C; the RSPB says it could be "*catastrophic for wildlife*".
- An admission that Marsh Harriers - which are protected species - could be impacted has forced EDF to make a case that building Sizewell C has Imperative Reasons of Overriding Public Interest (IROPI); without IROPI the Business Secretary of State should decline Development Consent.
- The project is enormous - too big for the setting and land available. The Government considers that a single new nuclear power station should occupy 30 hectares (based on Sizewell B). Sizewell C is squeezed into 32 - only available if Sizewell B facilities are relocated, resulting in further damage to the AONB. Hinkley Point C (HPC) in Somerset occupies 45 hectares.
- EDF has yet to persuade County and District Councils that the benefits will outweigh the impacts. There remain many outstanding issues of between them.
- 8 other uncoordinated energy projects - interconnectors and infrastructure to serve offshore wind farms - are planned locally. Construction would overlap with Sizewell C.

Environmental Impacts & Coastal Erosion:

- EDF will cut the AONB in half for 12 years, compromising the AONB designation.
- The construction areas, campus site, spoil heaps, quarries, haul roads and causeway crossing will threaten the fragile hydrology of the Minsmere Levels and Sizewell Marsh. Alterations in the management of water run-off could make sensitive ecosystems wetter or drier, while the causeway crossing will impede drainage of Sizewell Marsh SSSI habitat.

- Legally, Compensatory Habitats must be in place before construction, at least equivalent to those lost. EDF is relying on Aldhurst Farm and Marsh Harrier mitigation sites, which do not compensate for what would be lost. EDF's promise of diversity gain is questioned.
- Sizewell C's build will need 3 million litres of potable water a day at peak from dry Suffolk. EDF is not entirely clear where this will come from, and it may well affect local and farming supplies.
- 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 affect human health.
- EDF has not submitted a complete design for its 33 ft high hard coastal defence, which is unacceptable. The design may be inadequate, stopping above the low water line when it should go below it. The site would not be decommissioned until 2190, but sea level rise could make it an island.
- There are concerns that sea defences would exacerbate erosion north and south of SZC.
- EDF's advisers, Cefas, admit it is only possible to predict detailed changes to the coastline for the next 10 years, telling the East Anglian Daily Times that "*almost every prediction in the very long-term has no certainty*". (6 August 2020)
- Spent fuel will stay onsite until 2140; no long-term nuclear waste facility is yet available.

Transport:

- EDF claims it is "*significantly reducing the number of Sizewell C HGVs on local roads*", by bringing 40% of the 10 million tonnes of materials needed by rail (3 trains/night) and sea via a Beach Landing Facility. Peak truck numbers - 790 a day/ 1,140 on the busiest day - are higher than under their worst case Road-Led strategy widely rejected by elected representatives at Stage 4 (750 a day/ 1,150).
- EDF predicts there will be 10,092 car journeys/day travelling to all destinations including both Park & Rides, plus 700 vans and 700 buses, massively increasing traffic on the A12, surrounding roads and making use of rat runs more likely.
- The A12 and A14 are already problematic; the Orwell Bridge, EDF's Freight management facility and new roundabouts will all affect traffic on roads already susceptible to delays.
- The Two Villages bypass is considered by the Councils to be inadequate and some residents oppose the route, or oppose it altogether.
- EDF's 'Sizewell Link Road' from the A12 runs too close to villages, homes and listed buildings, potentially operating 24/7. It will sever communities, block country lanes and make farms unviable. Parallel to the B1122, it will be no use once the power station is built. EDF's case for rejecting routes with a legacy value such as W/D2 was strongly criticised by Suffolk County Council.
- New roads and Park & Rides would not be completed until year 3. During these 'Early Years', 760 trucks per day, plus those for other Energy Projects, and all other Sizewell C traffic would use the current A12 and B1122.
- Even with a new roundabout Yoxford will become a congestion and pollution blackspot.
- Around Hinkley C, rat-running on country lanes and village congestion from flyparking by workers are serious problems. EDF are doing nothing to prevent this here.
- Local communities oppose the locations of the Northern and Southern Park & Rides.

Economy:

- EDF says it needs 7,900 construction workers and 600 in associated development.
- “Local” is not local. EDF’s claim of “*up to c.2,410 jobs for Suffolk residents*” in fact refers to a commuting zone of 90 minutes’ drive, which covers most of East Anglia and Essex as far as Chelmsford.
- At peak, 76% of the construction workforce - that’s 6,000 workers - will come from outside the 90-minute zone and need accommodation in the area: 2,400 in a huge campus opposed by local communities, 600 on a caravan site, 1,200 in private rentals, 800 in tourist accommodation and 880 are assumed to buy houses.
- EDF expects 725 workers to be taken from other local employers, disrupting and undermining the viability of existing businesses and services.
- The impacts of the traffic congestion on existing businesses are not considered at all.
- EDF acknowledges that ‘local’ workers would only fill 8% of ‘Professional and Management’ roles compared to 90% of less-skilled, lower-paid ‘Site Support’ (eg security, catering, drivers, admin).
- EDF’s claim, based on HPC, that £125 million/year of project spend would come to Suffolk and Norfolk suppliers does not stand up. Their economic area for Hinkley C covers the whole of S W England and S Wales, which has 5 times more businesses and workforce than Suffolk and Norfolk.
- EDF’s intent to cut costs and minimise risk by redeploying the Hinkley C supply chain will mean Suffolk and Norfolk businesses may not get the chance to participate.
- Tourist surveys by EDF reveal that 29% of tourist visitors would be deterred from visiting the area during construction, and 39% would visit the area less often. EDF does not assess the economic impact of this, but it is easily in line with the Suffolk Coast Destination Management’s own calculations of losses of £24-40m/year and 400 jobs.
- Failure to properly assess the impacts on local businesses and tourism means EDF has not complied with its legal obligations, according to an independent consultant.

Community and Amenity:

- The influx of 6,000 workers will strain local services and create the potential for anti-social behaviour. The 2,400 bed campus is single occupancy and use is not compulsory.
- The construction site, campus, new roads and Park and Ride facilities will bring noise, air and light pollution and massive disruption to local communities.
- Local properties near the site and new roads will have significant noise: e.g. parts of Eastbridge will see increases of 600 times current ambient levels and Leiston Old Abbey Care Home will have increases of 200 times.
- There are concerns about local peoples’ access to health services, blue light services and on the mental health of local people.
- Footpaths and beaches will be closed. EDF says changes to views, noise, air quality or traffic could affect users’ of local footpaths “*perception of tranquillity*”.
- The project will significantly change views from many places on the coast. Huge onsite pylons instead of underground cabling will impact the AONB.
- EDF has provided no visualisations of what the site will look like during construction.
- EDF acknowledges that there “*may be an effect*” on the settings of about 90 grade II listed buildings that are within 5km of the site.

WHAT TO DO & DEADLINES

****REGISTER AS AN INTERESTED PARTY - deadline 30 September****

- Register via the Planning Inspectorate (PINS) website: www.bit.ly/SZCRegister.
- You must write and paste into this form a short statement, called a “Relevant Representation”, listing your issues of concern in around 500 words. Don’t worry about detail; it can be a simple bullet list, ideally including *everything* you would like to see raised in the examination. We’ve provided a 500-word template on our website: www.stopsizewellc.org/what-you-can-do. We would be grateful if you would include a line in your Relevant Representation, endorsing Stop Sizewell C’s Relevant Representation
- Send copies of your Relevant Representation to elected representatives. Email addresses are available via www.stopsizewellc.org/what-you-can-do

What Happens Next? *(expected timelines may be affected by COVID-19)*

- **Late November tbc: Preliminary Meetings** take place, online or locally.
- **Late December tbc:** submission of more detailed **Written Representations** on key issues.
- **Late January to late May 2021 tbc:** issue-specific **examination hearings** take place, online or locally.
- **Late August 2021 tbc:** The Planning Inspectorate must make a recommendation to the Business Secretary whether or not the project should receive planning consent.
- **Late November 2021 tbc: Secretary of State decision.**

What Else Can You Do?

- **Oppose digital examinations** - send a strong message that Sizewell C is too complex an application to be suitable for digital examinations. Send objections to the Communities Secretary Robert Jenrick, mhclgcorrespondence@communities.gov.uk, PINS sizewellc@planninginspectorate.gov.uk and copy your MP, County and District Council leaders (emails on www.stopsizewellc.org/what-you-can-do)
- **Sign** our joint petition with TASC www.stopsizewellcpetition.com
- **Follow** us on Facebook, Twitter and Instagram via the handle @stopsizewellc
- **Donate!** You can give online or offline. Details here: www.stopsizewellc.org/donate

And finally, remember that Sizewell C has more hurdles to overcome...

- Renewables are even cheaper than government previously acknowledged. National Grid has paid EDF millions of £ for Sizewell B to halve its output over the last 5 months.
- The ‘Regulated Asset Base’ model is apparently not favoured by the Treasury. EDF may be pressing government to take a stake in Sizewell C, but it will not help the UK “level up”.
- The involvement of China General Nuclear (a Chinese state company) in Hinkley, Sizewell and Bradwell is an ongoing concern for many MPs for security reasons.
- An Energy White Paper is expected imminently and an updated National Policy Statement is overdue. A decision on the Wylfa nuclear project (Horizon) is due 30 September. As mentioned, EDF admits CO2 from construction will take 6 years to offset.