



SIZEWELL C DCO Briefing

This document outlines key issues in EDF's Sizewell C Development Consent Order (DCO) proposals. It has been updated in April 2022. See last page for What to Do.

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 6.2m 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 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 with Sizewell B facilities being 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 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.

- TASC found that 20 million fish could be sucked into Sizewell C's cooling system each year.
- Legally, Compensatory Habitats must be in place before construction, at least equivalent to those lost. EDF is relying on Aldhurst Farm, Marsh Harrier mitigation sites and Fen Meadow compensatory habitats as far away as west Suffolk, 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. 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 still not submitted a complete design for its 10-14m high hard coastal defence, which is unacceptable. The design submitted so far still stops 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:

- The volume of materials EDF needs has increased from 10 to 12 million tonnes, meaning EDF'S original freight strategy was no longer workable. EDF now proposes *two* beach landing facilities (one permanent, one temporary) and use 8 train movements at peak (primarily at night, 5-6 days a week) to reduce HGV numbers but there is still a degree of uncertainty about what is possible. Peak truck numbers into the main site are 640 a day/840 on the busiest day. Without the extra trains and any sea transport, EDF admits HGVs would rise to 1,500/day.
- EDF predicts there will be 10,092 car journeys/day travelling to all destinations including both Park & Rides, plus 700 vans and 756 - an increased number - 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 and the County Council wants it removed. 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 and there is deep concern about the disturbance caused by night trains.

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*” refers to a 90 minute commuting zone 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 would 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.

Outline Examination Timetable *(subject to change)*

- **14 April 2021:** The examination started
- **18 - 21 May 2021:** Open Floor Hearings (Interested Parties [must apply by 12 May](#))
- **2 June 2021:** Deadline for submitting Written Representations.
- **June to October 2021:** Issue Specific Hearings (dates to be confirmed).
- **14 October 2021:** the statutory 6 month examination ends, unless an extension is sought.
- **14 January 2022:** The Planning Inspectorate must make a recommendation to the Business Secretary whether or not the project should receive planning consent.
- **14 April 2022:** Secretary of State decision.

WHAT YOU CAN DO

- **If you are an Interested Party, i.e. you registered in September 2020, follow our step by step guide on www.stopsizewellc.org/dco**
- **If you *did not* register in 2020, and EDF's new proposals affect you, you can ask to become an Interested Party by [completing this form](#).** You must also provide a short statement, called a "Relevant Representation", explaining your issues of concern in around 500 words and why you should be allowed to register.

Take Action!

- **Join us:** sign up to receive messages from us via www.stopsizewellc.org/join
- **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...

- EDF cannot pay for it and major pension funds have ruled themselves out of Sizewell C.
- The government is negotiating with EDF, but a deal could take years or never be made.
- A 'Regulated Asset Base' funding model would have to be legislated for.
- Sizewell C is too slow to contribute to the government's new target of 78% cut in CO2 by 2035. EDF admits it will take 6 years to pay back the increased CO2 (now 6.2 million tonnes) of CO2 emitted during construction.
- Renewables are even cheaper than government previously acknowledged. National Grid has paid EDF millions of £ for Sizewell B to halve its output last summer.
- It's not needed. Three out of five of the Climate Change Committee's energy scenarios in its 6th carbon budget (December 2020) had only 5GW of nuclear; that's equivalent of Hinkley C and extending the life of Sizewell B.
- 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.
- The planning process has already slipped by 5+ months. Planners advised government to refuse the Wylfa project on Anglesey because of environmental impacts.