

# THEBERTON AND EASTBRIDGE PARISH COUNCIL

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Dear Sir/Madam

## **Response to BEIS consultation on a RAB model for new nuclear projects**

The parish of Theberton and Eastbridge comprises:

***Theberton:*** a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C large twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village entrance sign. Within the village of Theberton there is St Peter's Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community and surrounding areas.

***Eastbridge:*** is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders the Minsmere River which cuts through an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is also the location of RSPB Minsmere Reserve. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the peace and quiet of the countryside.

Both villages are chiefly agricultural, and people live there historically or by choice for the tranquillity, dark skies, and the proximity to the Suffolk Heritage Coast. The two

villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

We have a number of significant concerns about EDF's proposed twin EPR reactor project at Sizewell C that the proposal of a RAB model exacerbates rather than reassures, and these are outlined below.

### **Problems with the Sizewell site:**

In summary, Sizewell is a site openly acknowledged by government<sup>1</sup> to be one of the two most environmentally sensitive in the National Policy Statement. The site is very small for twin reactors; 32 hectares compared to 45 hectares at Hinkley Point C. It lies wholly within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and adjacent to some of the most biodiverse habitats in the UK, including two Sites of Special Scientific Interest and the RSPB's Minsmere Reserve - an international RAMSAR site with European habitat designations. The RSPB says "*Sizewell is not a suitable location for a new nuclear power station*" and that the project could be "*catastrophic for wildlife*".<sup>2</sup> The Suffolk Heritage Coast, which would host Sizewell C, its spent fuel and waste for over a century, is an eroding coastline which is also slowly sinking, vulnerable to rising sea levels, increased frequency and intensity of storms and storm surges, with Flood Zone 3 land adjacent to the site.

### **Lack of infrastructure and the expected disbenefits in Suffolk:**

Suffolk has poor infrastructure and fewer significant centres of population compared to Somerset. EDF says it is unable to build a jetty, meaning the local area will be subjected to over 1,000 lorries a day at peak construction. EDF cannot recruit as many people locally in Suffolk as it can in Somerset, and so is having to provide beds for 3,000 workers - including in a huge multi-storey campus for 2,400 on the edge of Eastbridge. The company admits that the vast majority of jobs at Sizewell C will go to people from outside the area, and low unemployment in Suffolk means that those jobs that are taken by local people will likely be at the expense of important services such as social care. The Suffolk Coast Destination Management Organisation has evidence that Suffolk's tourism economy will take a significant hit that would be difficult to recover from. The Suffolk County and East Suffolk District Councils, the two main statutory consultees, are still 'unpersuaded' that the benefits will outweigh the impacts.

### **Cost of Avoidance of Impacts:**

The mitigation hierarchy for such enormous infrastructure projects is Avoidance, Mitigation, Compensation. As a Parish Council we already feel that EDF has not done enough to avoid the impacts that will be felt in the whole area, and neither are we satisfied that the proposed mitigation is sufficient. The Government's Nuclear Sector deal promises "*a lasting contribution to the communities that are host to nuclear facilities,*

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47800/1983-aos-site-report-sizewell-en6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47800/1983-aos-site-report-sizewell-en6.pdf) page 53

<sup>2</sup> [www.rspb.org.uk/our-work/our-positions-and-casework/casework/cases/sizewell-c/](http://www.rspb.org.uk/our-work/our-positions-and-casework/casework/cases/sizewell-c/) and [www.rspb.org.uk/get-involved/campaigning/love-minsmere-sizewell-c/](http://www.rspb.org.uk/get-involved/campaigning/love-minsmere-sizewell-c/)

*both current and future*<sup>3</sup> yet EDF's Simone Rossi's statements to the media about the expected cost savings to be made at Sizewel C<sup>4</sup> gives us cause for concern that the need to make savings will take precedence over the need to design Sizewell C in such a way that avoids impacts on host communities. Measures that appear to have been abandoned, in part for cost reasons, include a marine-led transport strategy and a rail-led transport strategy.

### **Conflict between appropriate plans and cost to the consumer:**

With the cost of new nuclear being ever more in the news with EDF's announcement that Hinkley Point C could cost an extra £3 billion and be a further 15 months late<sup>5</sup>, we are deeply concerned that the RAB model will provide yet another conflict between the regulator wishing to keep the RAB tariff consumers would pay down, and ensuring that the budget for an already extremely expensive new nuclear project includes sufficient measures to avoid, mitigate - or if necessary compensate - its considerable impact on local people. We refer back to the Nuclear Sector Deal, and are dismayed that there is no reference to communities in the RAB consultation document, nor mention of public benefit. These are significant omissions.

### **Value for money:**

We note that new nuclear projects would not be granted a nuclear RAB licence unless they could be shown to offer value for money for consumers and taxpayers; and assessment that would "take into account" the "wider benefits, specific to the project, which would influence a decision as to whether, on balance, proceeding was in the interests of consumers and taxpayers." Given that Hinkley Point C has been widely criticised for not offering value for money, we are concerned about and lack confidence in the efficacy of such an assessment.

We are further concerned about a number of other issues relating in the RAB model, including:

- **The vulnerabilities of the RAB model to regulatory pressures:** The setting of a "fair" price seems to us a regulatory nightmare, relying on correct estimates of unknown future scenarios and costs that cannot be predicted - including the long-term management of waste and spent fuel. This regulatory process seems likely to become even more complex and controversial as the disparity between the cost of new nuclear and alternative energy sources - especially offshore winds - grows.
- **Opposition from consumers:** People in our Parish have sent a strong message that they find the idea of paying for the privilege of major disruption and the threat of environmental damage to protected sites such as RSPB Minsmere totally unacceptable. Those that have chosen a renewable energy tariff are additionally outraged. We note that there remain uncertainties around risk-sharing in the RAB model given the high likelihood - especially with EDF's poor record of delivering EPRs - of overruns and overspends. We are concerned that our Parishioners will end up paying for EDF's incompetence.

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<sup>3</sup> <https://www.gov.uk/government/publications/nuclear-sector-deal/nuclear-sector-deal>

<sup>4</sup> <https://www.bbc.co.uk/news/uk-england-suffolk-42721057>

<sup>5</sup> <https://www.bbc.co.uk/news/business-49823305>

In conclusion, we consider that new nuclear, in particular EDF's Sizewell C twin EPR project, is too inherently risky to be suitable for a RAB model. It is too expensive and impactful compared to other energy sources to ever be able to offer value for money, and EDF's track record of on-time, on-budget delivery is frankly appalling.

We endorse the Theberton and Eastbridge Action Group on Sizewell's response to this consultation.

Yours faithfully

Sharon Smith  
Clerk to Theberton and Eastbridge Parish Council