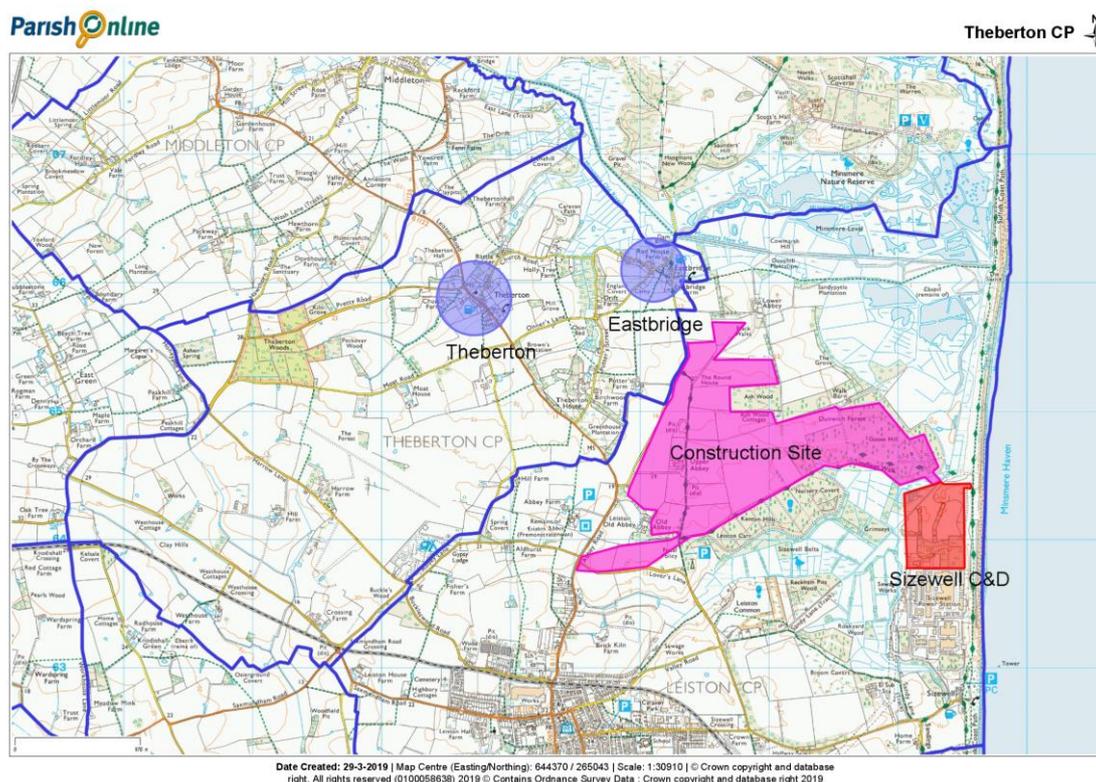


EDF ENERGY - SIZEWELL C - STAGE 3 PRE-APPLICATION CONSULTATION

RESPONSE FROM THEBERTON AND EASTBRIDGE PARISH COUNCIL

Introduction



Theberton

Theberton is 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 (SZC) 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 Peters Church, a Grade one listed thatched roof church with an unusual round tower, a Grade two 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

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 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. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via National Trust's Dunwich Coastguards Cottages.

Both villages are chiefly agricultural and people live there historically or by choice for the tranquility, 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.

Many of the concerns expressed in this response were also supported and expressed at a joint public meeting on 23rd February at St. Peter's Church, Theberton hosted by T&EPC and Theberton and Eastbridge Action Group on Sizewell at which approximately 370 people attended.

1. Executive Summary

- 1.1 **The Parish Council (T&EPC) is, once again, disappointed that at this Stage 3 consultation, studies that were proposed 6 years ago in Stage 1 and earlier in EDF's Scoping Report are still not started. Little additional information has been provided on impacts to the delicate environments that this construction site will occupy and the surrounding designated sites at Sizewell and Minsmere. A brand new relief road proposal has been introduced at this, the final stage of public consultation. The options presented for relief road routes have not been adequately explored or compared appropriately to allow an informed opinion to be formed by T&EPC.**
- 1.2 In the years since the Stage 1 Consultation, there has been much discussion on the environmental appropriateness and accessibility of this site for what will be the largest construction project in Europe. Issues with the addition of pylons, incomplete hard coastal defence (HCD) plans and an operational platform of only 32 hectares compared with an understanding in National Policy Statement EN-6 that single reactor sites would require approximately 30 hectares raise further concerns about the adequacy of this site for a dual reactor installation.
- 1.3 The removal of the jetty options for significant material deliveries by sea has raised the issue of construction site access and suitability of both road and rail infrastructure to support such a proposal.
- 1.4 The impact of construction traffic in the rail-led proposal is not significantly different than was proposed at Stage 2 when the jetty options were still included. At that time the Parish Council stated that a relief road from the A12, similar to the D2 proposal during the Sizewell B development, should be included to relieve the B1122 whether the rail-led or road-led option is adopted.
- 1.5 **It is our opinion that both the Theberton Bypass and Link Road proposals are in the wrong place, do not relieve impacts placed upon the residents, farmers, sensitive buildings and businesses along its length and closes roads and interrupts public rights of way (PRoW).** It also has limited use post construction as the road runs parallel to the existing B1122. We again state that a relief road that has minimal impact, such as the D2, or W from Stage 3 documents, offers reduced impact, shorter journeys for 85% of traffic coming from the south and a positive legacy for Sizewell, Leiston, Yoxford, Middleton and Theberton.
- 1.6 **Any relief road that is built should be initiated and completed in advance of any significant work being started on the site.** It is simply not acceptable that the B1122 should be the primary route to site for up to 600 HGV movements per day for two years whilst these preparation works are ongoing.

- 1.7 The site is in an Area of Outstanding Natural Beauty on the Suffolk Heritage Coast, next to Minsmere Nature Reserve, the flagship of the RSPB, which forms part of the Minsmere and Walberswick Heaths and Marshes Site of Special Scientific Interest and is of huge importance for tourism and wildlife. The village of Eastbridge lies only 260 metres from the northern edge of the site where borrow pits or sand quarries are proposed. Noise, light and air quality issues from construction vehicles and fugitive dust from 35 metre spoil heaps will blight the area for well over a decade and will have negative effect on the local tourism economy estimated to be worth £260M and approximately 4,600 jobs.
- 1.8 T&EPC continues to be opposed to EDF's current proposals for siting the accommodation campus for 2,400 workers at the edge of Eastbridge which will have an intolerable impact upon Eastbridge. We expect that sites brought forward in the Boyer and Cannon Report (B&C) for using some sites in a more urban setting be used to reduce the impact of such a large site, so close to Eastbridge. We also note the request in the Suffolk County Council/Suffolk Coastal District Council joint response for EDF to also consider sites in Lowestoft and Ipswich.
- 1.9 Again a major weakness of the consultation documents in Stages 1, 2, & 3 is that nowhere is the on-site cumulative impact of all the processes brought together so a proper evaluation can be made and informed responses to the consultation questionnaire be given. It is also unacceptable that additional cumulative impacts from the other NSIP developments by Scottish Power and potential developments by National Grid Ventures cannot be evaluated, at this, the last public consultation phase.
- 1.10 We understand and hope that there will be job opportunities for local people, availability of youth training, and opportunities for local businesses through EDF's supply chain. However, we are concerned that with only 280 job seekers in the SCDC area (ONS) and EDF's definition of home based workers having a commute distance of up to 90 minutes that, as for the Sizewell B build, many truly local employees will come from the existing local workforce creating difficulties for local businesses and the tourism sector to find replacements and thus significantly impacting the existing economic base of the area.
- 1.11 The current proposals do not demonstrate that the impacts on the communities and delicate environment around SZC will be outweighed by the benefits and EDF has proposed only limited mitigation, compensatory action or expenditure to minimize the considerable burden placed on the residents of Theberton and Eastbridge during the 10 – 12 year construction period.**
- 1.12 As a result we believe EDF have not yet satisfied their Statement of Community Consultation or followed the National Policy Planning Framework and need to consider all the points raised in this and other consultation responses, bring their assessments closer to a conclusion and consult the community once more before submitting an application for Development Consent.**

2. Main Development Site: Environment

- 2.1 The use of 250 hectares of AONB land that bisects the AONB for over 10 years and will inflict significant levels of noise, light and air pollution on this sensitive environment is unacceptable. The AONB land is also surrounded by two Sites of Special Scientific Interest with unique habitats for birds, reptiles, fauna and flora which will also be seriously affected for the duration of the development.
- 2.2 We are concerned that the true nature of the area in and around Sizewell Marsh that is to be destroyed or damaged by the development, is poorly represented in the Preliminary Environmental Impact Report (PEIR) and ask that EDF publish in full the surveys referenced in its PEIR as well as any historic surveys within the SSSI, so consultees can understand both the current status and long term trends developing within the marsh and assess the potential threats introduced by the development.

- 2.3 We are led to believe that a significant number of Red Book Species have been found within the marsh over the years, including Norfolk Hawker (RDB1), that is mentioned in the PEIR, with a number of these species also being classified as Species of Principle Importance according to NERC (2006) Section 41 but not referenced in the PEIR.
- 2.4 Two nationally scarce plant species are referenced in the PEIR as present in Sizewell Marsh SSSI, Frogbit and Soft Hornwort, and it is likely that the SZC platform development will impact and/or destroy ditches where these would be expected to be found.
- 2.5 We are concerned that the areas that have already been set aside to acid grassland as Marsh Harrier feeding mitigation have no clear development plan to achieve the stated aim of developing rare lowland heath habitat.
- 2.6 Considering the fact that the stated aim of the restoration of the development site is to the same habitat type, we feel that a clear plan of action is required in the PEIR for both the current development of compensatory habitat and the restoration of the construction development site.
- 2.7 We fully endorse the detailed response made by Minsmere Levels Stakeholders Group regarding both coastal and inland hydrological impacts.
- 2.8 We are pleased to see improved assessment conclusions in a number of areas including surface water impacts but are still concerned that these are not always supported in the PEIR by underpinning data or figures in volume 3 of the PEIR. In particular the request by the Secretary of State (SoS) in the Scoping Report Opinion stressed that a good understanding of the relationship between surface water and groundwater be established to ensure that threats to both Sizewell Marsh and the south Minsmere Levels could be properly modelled and appropriate mitigation be planned for potential impacts. This is completely absent in the PEIR.
- 2.9 We note that groundwater maps are present for the area of marsh immediately west of the SZC operational platform that covers Sizewell Marsh and the immediate watershed from both south and the construction development site consisting of the south flanks of Goose Hill. However, there are no attempts to do likewise for the area in the south Minsmere Levels and the watershed into that valley from the northern flanks of Goose Hill and Ash Wood even though these are the areas that will host the two largest borrow pits and two large Water Management Zones (WMZ).
- 2.10 We believe that the potential for detrimental impacts on the Minsmere coastal frontage and the functioning of the Minsmere sluice during the construction, operational and decommissioning periods remain a major concern.
- 2.11 Close to 6 hectares of Sizewell Marshes SSSI will be lost forever to the overall 55 hectare SZC station platform development and site development activities, such as moving the Sizewell Drain, and creation of the cut-off wall will damage a further 3-4 hectares of the SSSI. We believe this damage is unacceptable and cannot be compensated or mitigated considering the rarity of the habitats involved.
- 2.12 The Aldhurst Site Habitat Creation site was created as compensation for a bridge structure across the SSSI. Whilst welcome, it cannot in anyway be considered as adequate compensation or mitigation for the loss and damage of up to 9 hectares of SSSI.
- 2.13 The construction development area will consist of about 170 hectares of permeable, semi-permeable and hard standing. Water Management Zones (WMZ) will be used to divert and hold rainwater runoff from the site. There is great potential for water in the WMZs to be polluted from development site workings. It is essential that water reaching the surrounding SSSI is treated in an appropriate Waste Water Treatment Plant (WWTP) and free from any site pollution.
- 2.14 We believe it is essential that a properly researched baseline water level map for both the Sizewell marshes and the Minsmere Levels south of the Minsmere New Cut is produced. Whilst it is apparent that some of this work has been done for Sizewell Marsh, there is no evidence that this has been done for south Minsmere Levels or the exit corridor of the Leiston Drain.

- 2.15 Actual hydrological and coastal erosion data must continue to be collected during the development, into the operational and later to the decommissioning stages of SZC which can then be compared to the predictions to ascertain whether SZC has impacted the expected behaviour of the landscape and trigger mitigation by EDF.
- 2.16 On the basis of these models and the potential disturbance relative to the baseline, EDF should also be explicit about their capability to mitigate should the actual changes deviate significantly from the baseline.
- 2.17 There is no mention in the consultation document regarding supply and usage of potable water or other abstracted water for use during the construction or onwards into operation of the site. As one of the driest areas in the UK and considered to be water-stressed, it is lamentable that this information, required by the SoS has yet to be detailed in any public consultation so far.
- 2.18 We are concerned that the damage to the AONB and both SSSI during the build and the proposed changes to the land to provide new habitats, such as lowland heath, will mean the overall habitat sustainability will be considered as in deficit for several decades after the construction is complete. As a result we feel this scale of development in this sensitive area is unacceptable.
- 2.19 In summary, T&EPC believes that the SZC development proposal is too big, seriously damages the AONB and both SSSI making the project environmentally un-sustainable because:
- Sizewell B facilities have to be moved into woodland and open fields
 - The new training center for SZC is now to be placed on Goose Hill
 - Underground National Grid connection cables have now to be strung on four 65 metre high pylons
 - There are issues with the coastal defences reaching the required depth below low tide level
 - The platform area of 32 hectares only just exceeds that recommended within National Policy Statement EN-6 legislation for a single reactor
 - Over 90% of the 250 hectare construction site is within the AONB and adjacent to two Sites of Special Scientific Interest
 - Lack of long term management plan for restoration of the construction site
- and as a result should be reduced to a single reactor installation.

3. Main Development Site: SSSI Causeway Crossing

- 3.1 Due to the expansion of the SZC platform, the Leiston Beck and Sizewell Drain will be redirected to a single channel to access the Leiston Drain that connects this area to the Minsmere Sluice.
- 3.2 The causeway crossing the 'neck' of the Sizewell Marshes and Minsmere SSSI sites will compress the underlying material and effectively block the natural hydrological flow between these two areas. The SoS request that surface/groundwater interactions be fully understood by EDF has not been achieved so far, as demonstrated by a lack of any mapping of the groundwater in south Minsmere Levels or discussion of the interaction between surface water and groundwater. It is essential for the preservation of the biodiversity of these designated areas that these interactions are understood so that appropriate monitoring and mitigation can be developed and operated in the long term.

- 3.3 Despite the installation of water control features on the new Leiston Drain it is highly likely that water levels and ground saturation behind the cut-off wall for SZC will permanently change after construction in the same way that has happened to the rear of Sizewell B. Long term monitoring and mitigation plans need to be defined anticipating such an outcome.
- 3.4 We are still unhappy with the selection of a causeway crossing of the Sizewell Marsh SSSI due to the potential for groundwater transport interruption across this boundary as well as the long term removal of a wildlife corridor which we do not believe is mitigated by the increased width of the culvert. So we continue to request that a bridge solution (Option 3 in Stage 2) be developed for access to the platform.

4. Main Development Site: Managing Construction Materials

- 4.1 Three borrow pits (pits 2,3 and 4 from the Stage 2 consultation) totalling approximately 17 hectares have been selected for the retrieval of construction materials and to bury “unsuitable” materials from construction excavations. T&EPC is pleased that EDF have rejected pit 1 to the west of Eastbridge Lane but are disappointed that the three pits will still be within the AONB.
- 4.2 As the borrow pits will be excavated to within 2 metres of the groundwater level, there is significant potential for the borrow pit back-fill materials, including highly acidic peat from Sizewell Marshes SSSI, to introduce pollutants to the secondary aquifer and consequently the local waterways that form part of RSPB Minsmere and Minsmere Levels SSSI in the decades after the pits are filled and closed. We are concerned that no long term monitoring of the groundwater surrounding this area is proposed to ensure that pollutants and leachate do not contaminate local groundwater which ultimately feeds into south Minsmere Levels.
- 4.3 The borrow pits are very close to the Marsh Harrier fields being developed and, as a consequence, noise and light pollution from the development are likely to disturb the feeding and breeding patterns for this protected species and other nesting species in the Minsmere Reserve. We are also concerned that the excavation and works surrounding these borrow pits will have a significantly detrimental effect on bat roosts and feeding areas in Ash Wood.
- 4.4 Over 20 hectares of spoil heaps and extracted sand and gravel resources are proposed. These heaps are to be between 20 and 35 metres high at their maximum and the heaps will be on site for up to 8 years in total. The spoil heaps straddle the 15 metre contour line and with valleys both north and south, the sea to the east and the nearest 20 metre contour about 1 kilometre to the west, these heaps will be visible for most of the development time from Eastbridge, Leiston, Theberton, RSPB Minsmere, Leiston Abbey Monument and Dunwich Heath (NT) as well as most of the PRoW that criss-cross the area on all sides of the development. They will be totally out of keeping with an AONB designation that also includes Special Landscape Areas, Special Areas of Conservation, two Sites of Special Scientific Interest and Heritage Coast.
- 4.5 With prevailing winds from the south west, the natural travel for dust and sand pollution will be directly across the Minsmere Levels SSSI, on into the RSPB Minsmere nature reserve and onwards to the National Trust Dunwich Heath property, threatening wildlife on the Minsmere Levels and Reserve. We are sceptical that the proposed watering and hydro-seeding of these heaps will be able to prevent fugitive dust escaping from the site. Experience of local farmers confirms that even land that has crop growing upon it, is susceptible to dust flying, especially in the strong winds (30-40 mph gusting to 60 mph) that we experience along this coast from late autumn to late spring.

5. Accommodation

- 5.1 **We still find the EDF choice of a single campus on the Eastbridge Lane site unacceptable**, although we are pleased that the plans for the Eastbridge Lane site has seen the campus restricted to the east of the lane and that the accommodation heights have been restricted to 3 and 4 storeys.
- 5.2 It is to be noted, in regard to the rejection of siting a campus for 2,400 workers at Eastbridge Lane, we are wholly supported by SCC, SCDC, AONB and other local organisations such as Suffolk Preservation Society.
- 5.3 Since the Stage2 consultation Suffolk County Council (SCC), in July 2017, commissioned Boyer and Cannon (B&C) to produce an independent review of potential accommodation sites. As part of that review all three sites that were options in the Stage 1 proposal were also reviewed and the current proposed campus close to the site entrance on Eastbridge Lane was deemed to be the least suitable in their RAG assessments, when you ignore two sites that were rejected outright.
- 5.4 Eastbridge is seen as the least suitable site by B&C having “Significant Cumulative Environmental Impact” with “No Legacy Potential”.**
- 5.5 We are disappointed that there is no reference within the Stage 3 consultation documents that the alternative site suggestions, given by B&C, have been evaluated in any way, despite assurances to the contrary during meetings with EDF in the period between publication and the Stage 3 consultation start.
- 5.6 At Stage 1, two other sites were suggested as options by EDF. The first, Broom Covert, was rejected by both EDF and B&C as it is wholly contained within the AONB. The other, south of King Georges Avenue was rejected by EDF as the proposed entrance was across AONB land, but was still considered as viable by B&C using an alternative access route not across AONB land. This site also appeared in the initial stage of consultation for new housing in the new SCDC Local Plan. This site, as well as the proposed caravan site on the Land East of Leiston Industrial Estate, could also use the access route from Lovers Lane into the south of the construction site, thus reducing traffic flow at the main roundabout “pinch point” on the B1122. This suggestion and others by B&C should be reconsidered.
- 5.7 We have always understood the need for EDF to have a contingent of workers housed close to the construction site as at their Hinkley Point C development where 500 workers are immediately adjacent to the site and 1000 are on a development on a brownfield site in Bridgwater (pop. ~41,000) close to the town centre. We again request that EDF consider a split campus with a proportion of the workers housed in an urban setting as suggested by B&C or, as SCDC suggest, in Lowestoft or Ipswich where there is also potential for legacy, such as that built in to the Bridgwater campus site.
- 5.8 EDF insist that locating the whole of the campus at the site entrance is the preference of the workers, but these assertions were made when the only campus site available at Hinkley was on site and the Bridgwater campus was unfinished. So the assertion is not justified with actual occupancy statistics but was rather the stated preference of worker management. We would be interested in seeing occupancy statistics for both HPC campus sites and any surveys of the resident populations where their actual preferences for location are expressed.
- 5.9 There is also a significant danger that the take up of holiday accommodation by workers will have a blighting effect on tourists to the area and deter them in the future from returning.

- 5.10 The proposed campus site for 2,400 workers with 3 and 4 storey buildings and a two storey car park for 1,500 cars, accompanied by restaurant and leisure facilities, is adjacent to the main access road to Eastbridge, bordering the AONB and with onwards access to RSPB Minsmere. Eastbridge Lane will be accessed off the site entrance roundabout that will experience a high volume of HGV, bus, LGV and car traffic for the site and campus together with existing Leiston and SZB traffic resulting in a serious traffic “pinch point” at the site entrance on the B1122. The effect of the campus and adjacent borrow pits and spoil heaps on the rural aspect of this lane, for residents and visitors alike, will be akin to entering an industrial estate and will seriously affect long term visitor numbers to The Eel’s Foot Inn with 6 rooms and 6 caravan club pitches, the local farm campsite, holiday accommodation and ultimately visitors to RSPB Minsmere.
- 5.11 We understand that placing all the 2,400 workers on a single campus will reduce traffic to the site as the workers will not have to be bused to the site for their work shifts. However, we believe that there will be a significant level of traffic associated with workers moving off-campus for leisure. The B&C report supports this and estimates that at least 400 car movements per day are likely to arise from the campus at full occupancy.
- 5.12 The campus sits on agricultural land right beside an AONB, being close to Minsmere and next to Eastbridge. It is a deeply rural area, with no street lighting, enjoying dark night skies, clean air and a very low quiescent base line of noise. Such qualities are special and rare, and must be protected, not needlessly destroyed. Modern lighting techniques, sound-insulated accommodation blocks and soil mounds will not mitigate these issues.

6. Transport: General

- 6.1 We are pleased that EDF has at long last recognised that the need for a relief road following the abandonment of the jetty and delivery of materials by sea. However, we were already of the opinion that a relief road was necessary at Stages 1 and 2 considering the predicted road transport volumes.
- 6.2 We are very concerned that even should a relief road be built, that EDF envisage significant traffic, including up to 600 HGVs per day, to use the B1122 as the main access route for up to two years. As we have stated in our Stages 1 and 2 responses, the B1122 is not suitable for such vehicles and volumes and we would expect any relief road to be started well in advance of main site work to reduce the impact on residents and buildings along the current B1122 route.
- 6.3 We remain of the opinion that the route with least overall impact on residents, farms, businesses, PRoW and properties is what was previously called D2 and now appears briefly in this Stage 3 consultation as route W. As such T&EPC are against the proposal for the Link Road and Theberton bypass and are of the opinion that D2/W should be the route of any relief road.
- 6.4 When examining the options of Link Road/Bypass or route D2/W it is also apparent that following the completion of the proposed SZC development, only the D2/W route offers a long term benefit to the communities in the Sizewell and Leiston area and on this basis also we feel that it is the better short and long term route as it will also provide improved emergency vehicle access and a better evacuation route.
- 6.5 We are very concerned that there appears to be little confidence in achieving a successful outcome for a rail-led solution to the transport of construction materials and yet assuming that such a modal split with 5 trains per day is achieved, the level of road transport expected by EDF has not changed significantly from the maximum scenario envisaged at Stage 2 of this consultation. We repeat that we do not agree that a simple Theberton bypass is appropriate or sufficient for the level of HGV and other traffic predicted for this scenario. A proper relief road is needed from the A12 to the SZC site entrance, for which route D2/W should be considered as the most appropriate.

- 6.6 We are still concerned that all traffic including existing B1122 traffic, SZB outage traffic plus SZC HGV, Park & Ride Buses, LGV, campus residents and authorised car park workers will all have to arrive and leave via the new site roundabout at the top of Eastbridge Lane. We are concerned that at peak times this roundabout will become a bottleneck and cause tailbacks both towards Theberton and Leiston and make exiting Eastbridge Lane very difficult and potentially disrupting emergency vehicle access to surrounding villages and Leiston.
- 6.7 We are pleased that HGVs will only be allowed to travel on pre-authorised routes both to and from the site but insist that this also apply to all Park & Ride Buses as well as buses from other destinations such as Saxmundham, Ipswich, Woodbridge and Lowestoft.
- 6.8 We feel that car pools and car sharing should be encouraged both for site workers who are authorised to travel directly to the site and also those who will access the site via Park & Ride sites to minimise as far as possible traffic on the roads in the same way that EDF are intending to operate a freight/post consolidation point at Wickham Market Park and Ride.
- 6.9 We are concerned that traffic modelling may not adequately reflect the combination of both weekday and weekend traffic. Normally, weekend traffic is excluded as it is considered to reduce the traffic estimates and predictions but in an area where weekend traffic can actually be as high or on occasion higher than weekday traffic, weekend traffic flows should also be included in a separate set of models to get an overall picture as the site will be working 24/7. We are opposed to a relaxation of restrictions of travel hours for HGV and other delivery vehicles to 24 hour operation.
- 6.10 With the experience at Hinkley Point C (HPC) showing that local villages and lanes are being used as informal car parks disrupting local traffic and impacting local residents, we need assurance from EDF that this will be controlled and not tolerated during any SZC development.

7. Transport: Link Road and Theberton Bypass

- 7.1 As stated in our Stage 2 Consultation response, T&EPC supports the D2 or route W as a relief road for Sizewell C traffic. **We are NOT in favour of the Link Road and Theberton Bypass.** We are concerned that the very early sketch presentation of this proposed route is very disruptive to the residents both along the route and those in nearby villages and hamlets who regularly use the existing B1122 and PRoW that cross or join the B1122.
- 7.2 We would encourage EDF to complete a proper evaluation of this route taking into account the valleys, crossing roads, PRoW, farms and residences along its route to ensure that communities and residents are not isolated and that fields are not bisected in a manner that leaves areas isolated, inaccessible and unable to be productive.
- 7.3 We note that a number of roads are shown as closed making existing journeys significantly diverted. Many of these roads are regularly used by residents to access essential facilities, such as supermarkets, doctors and schools, in Saxmundham and Leiston. As a result we would suggest that the following roads are bridged or allowed to pass below the new road. These include Pretty Road, Fordley Road, Littlemoor Road and Hawthorn Lane as mitigation.
- 7.4 There are also a total of about 10-12 PRoW that will be crossed by this route. It is vital that mitigation using minimal diversions or road crossings with a central refuge are included in the design of the route.
- 7.5 A number of farm/field access tracks are also crossed by the route and mitigation will be required by providing safe crossings, underpasses or bridges as appropriate. Speed limits or traffic light controls may also be necessary where livestock crossings are likely to be required across the route that cannot be accommodated in any other way.

- 7.6 We fully endorse the additional points raised by the B1122 Action Group in its responses to the Stage 3 consultation questionnaire in relation to the B1122 and Theberton Bypass/Link Road proposal.

8. Transport: Rail

- 8.1 Both the rail-led and road-led options are dependent upon the ability of Network Rail to deliver upgrades to the Ipswich to Lowestoft coastal line and the Sizewell spur from Saxmundham.
- 8.2 Statements in the Stage 3 documentation imply that EDF are uncertain of whether the required upgrades and changes can be delivered at all or in good time, in particular for the rail-led strategy.
- 8.3 As clarity is key on these proposals and the resultant impact in terms of potential increases in road based deliveries, we fully support the SCDC and SCC response that *“At this, final public round of consultation, the Councils and the public should have far greater assurances of any option being presented. This work should have been completed by EDF before Stage 3 to ascertain exactly what infrastructure is required to deliver the rail option and that it is deliverable within the required timescales.”*
- 8.4 No matter which rail strategy is in the end considered achievable by EDF, the volumes and nature of the traffic generated by both strategies and the inadequacy of the B1122 and its Yoxford A12 junction to support the levels of traffic envisaged, require EDF to provide a proper relief road in advance of the development that can adequately cope and at the end of the project leave a road that has real value, rather than a road that runs parallel to the B1122 and is too far north to provide any incentive for its use by the majority of traffic coming from the south.

9. Transport: Sea

- 9.1 T&EPC understands the reasons behind the removal of the jetty option for delivery of construction materials and the potential removal of excavation materials that are not suitable for use in the construction.
- 9.2 We still have reservations regarding the Beach Landing Facility and its position on the coast as a hard point that has implications for coastal erosion.
- 9.3 We fully endorse the analysis in Stage 3 responses by the Minsmere Levels Stakeholders Group and Suffolk Coast Against Retreat regarding the effects of the Beach Landing Facility and the Hard Coastal Defence.

10. Transport: Road Improvements – Yoxford / B1122

- 10.1 EDF identify that there are already traffic problems at the junction of the B1122 and the A12 at Yoxford. If the B1122 is to be used as the only means of access for traffic associated with the early years of the construction of SZC prior to the roundabout being completed, there will be intolerable congestion which will only be exacerbated by the level crossings on the A12 and B1122 and proposed works to create the link road and bypass.
- 10.2 The use of the D2 or W route for a relief road in advance of the main site work commencing would allow the creation of the roundabout for the junction of the B1122 and A12 with minimal disruption and lay a sound foundation for the SZC development as a whole.
- 10.3 If the D2/W route is chosen to provide the main relief road, we believe that changes to the B1122 are still required to cope with non-HGV traffic such as Park & Ride buses, LGV and other additional traffic as well as work on the structure of the road which is cracking along the road widening join that was created for the Sizewell B construction.

11. People and Economy

- 11.1 Whilst we understand that EDF have created Hinkley Point C apprenticeships and work with the National Nuclear College at Cannington to provide training for students who have an interest in working in this sector, EDF should also establish strong links with local schools and colleges and create specialist training facilities locally to encourage local youngsters to follow a career with energy engineering in all its formats and levels.
- 11.2 For people who live close to this very special area of the Suffolk Heritage Coast, the constant impact of noise, light pollution, dust and traffic will make their daily lives very different to that experienced today. The utter peace and quiet, and quality of life of this beautiful landscape, which also draws thousands of holidaymakers from across the UK and abroad to this area every year will be lost for 10 -12 years and mitigation for such disruption is simply not possible.
- 11.3 The tourist economy in this part of Suffolk is reported (AONB, DMO, SCC and others) as being worth approximately £260 million per annum, and supports over 4,600 jobs and multiple businesses. This part of the local economy will be hard hit by the impacts of traffic on the A12 and local roads, the highly visible development site, the loss of access to the AONB and the general visual impact of the development site and its noise, dust and light pollution. Existing local service staff moving to work at SZC will also make running the tourist based economy more difficult as staff become scarce and replacement workers impossible to find.
- 11.4 With the plans for 3,000 accommodation spaces in the campus and caravan site, an expectation that local caravan sites will expand their capacity to accommodate further workers and a stated wish to use the Hinkley Point supply chain and experience, there is a dwindling number of jobs that can be expected to be filled by workers from the Suffolk Coastal area, reducing significantly the claims of a positive financial and employment impact.
- 11.5 According to the Office for National Statistics, in 2017, there were 280 active jobseekers in the Suffolk Coastal area and we are all well aware that this area has one of the lowest unemployment rates in the country.
- 11.6 EDF's assertion of local job creation for the missing 2,600 jobs at the peak of construction, as the result of this development, will have to find another source of workers. Those who end up being employed by EDF are most likely to transfer from existing positions in local companies and as they already live locally, this will put massive pressure on these existing local companies to be able to recruit replacements. Indeed during the SZB development, much the same pressures were observed and a number of companies went out of business as a result. When the SZB project then finished, the number of companies operating in the area had been reduced and employment opportunities scarce. This is the classic "boom and bust" scenario that Leiston, in particular, experienced as a result of SZB and we fear being repeated for SZC.
- 11.7 We are concerned that the housing fund that is proposed as well as being targeted at bringing unoccupied dwellings back into use is also targeted at identifying and increasing Houses of Multiple Occupancy in the area. Experience in Bridgwater of the increase in HMOs has been issues with on-street parking, noise from workers leaving and returning from shifts at unsociable hours and overall, in 2017/18, an increase in rents of 18% in a single year. Many residential roads in this area are narrow and already have parking issues associated with them. Additional HMOs will only serve to significantly increase this problem which will lead to further tensions in the communities affected.
- 11.8 We are concerned regarding the potential for anti-social behaviour in the local villages and Leiston. We ask EDF to explain how their Worker Code of Conduct will be used to enforce good behaviour both on-site and in the local area.

12. Consultation Process

- 12.1 Once again, the level of detail, lack of adequate justification of options and rejection of options with minimal or no justification is lamentable.
- 12.2 The SoS, in their response to EDFs original Scoping Report, is very clear that options being proposed and rejected need to be clearly compared and justified otherwise the public and Planning Inspectorate will have insufficient information upon which to make an informed decision regarding the suitability of the choices that are adopted.
- 12.3 The result of the jetty being rejected is a complete change to the “modal split” for delivery and potential removal of materials from site. New options have belatedly been introduced to the proposals of rail-led or road-led delivery of materials. Three main routes for a relief road from the A12 to the site entrance have been added to the consultation with two being rejected cursorily (one being the old D2 route proposed for SZB) and a third Link road/Bypass proposed which has had virtually no serious investigation and yet seems to have been selected as the best candidate.
- 12.4 To introduce a brand new suggestion at this late stage without any real proposal comparisons being made, other than a few words that the D2/W had some engineering challenges, is no consultation at all and does not meet the consultation criteria of the SoS.
- 12.5 The computer generated images (CGI), whilst a helpful tool, do not realistically represent the landscape that will be changed for many years to come. The spoil heaps and borrow pits will not be neatly shaped mounds of sand, peat and clay. Those of the platform used in on-line “adverts” showed a view of the platform construction site with 2 or 3 tall cranes. At HPC they are expecting > 30 cranes at the height of construction. This is simply misleading and in fact back in July 2018, HPC had over 14 cranes operating and visible in the night sky all lit up and casting a glow across the landscape.

13. Conclusions

- 13.1 Theberton and Eastbridge Parish Council believe that the current proposal does not make an adequate case for a two reactor development on the 32 hectare platform as there are significant issues managing all the elements in this confined space.
- 13.2 In this response we also detail a significant number of omissions, shortcomings and safety concerns contained within this third stage of public consultation. This has resulted in T&EPC being unable to come to a final conclusion whether the project as currently defined can be supported.
- 13.3 We support SCDC and SCC in their response which states “At this, final public round of consultation, the Councils and the public should have far greater assurances of any option being presented. This work should have been completed by EDF before Stage 3 to ascertain exactly what infrastructure is required to deliver the rail option and that it is deliverable within the required timescales.” This statement could just as easily be applied to other aspects and options that are proposed or have been rejected over the course of the three stages of consultation over the past six years.
- 13.4 We are of the opinion that EDF have not at this time satisfied their Statement of Community Consultation or conducted a consultation that meets the requirements of the National Planning Policy Framework and that a further stage of consultation should be entered into once sufficient clarity and supporting information has been determined and collected in order to provide a meaningful Preliminary Environmental Impact Report that will provide the necessary justification for the choices and proposals made to support this development.