

**Sizewell C Development Consent Order**  
**Joint Written Representation on behalf of**  
**Stop Sizewell C and Theberton and Eastbridge Parish Council**  
**Proof of Evidence related to Community Impacts**

<b>Index</b>	<b>Page</b>
1. Summary of concerns and objections	2
2. Qualifications for giving evidence	5
3. Involvement with local organisations	6
4. Site and surrounding area	6
5. Description of the proposed development	8
6. Elements of concern to Stop Sizewell C and Theberton & Eastbridge Parish Council	9
6.1 Local Communities	
6.2 Accommodation Campus and Strategy	
6.3 Borrow Pits and Spoil Heaps	
6.4 Transport	
6.5 Landscape	
6.6 Built Heritage	
6.7 Environment	
6.8 Social Impacts	
6.9 Cumulative Impact	
6.10 Draft Development Consent Order	
6.11 Stop Sizewell C and Theberton & Eastbridge Parish Council List of reasons for rejecting the Development Consent Order	
7. Recommended planning conditions, planning legal agreements and other safeguards should Development Consent be given	75

## **1. Summary of Concerns and Objections**

Stop Sizewell C (Theberton & Eastbridge Action Group on Sizewell) and Theberton & Eastbridge Parish Council are not, in principle, opposed to nuclear power. However, based on the evidence presented, we are deeply concerned that the development of the twin reactor project exceeds the practical capacity of the proposed Sizewell C platform, which is dictating unacceptable changes in site protection, layout and access. This threatens the long-term safety and environmental integrity of the site and its surroundings and the legacy that will be left for nearby communities and businesses once work has been completed.

Sizewell C's construction will also 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 and designated environments in which this project is proposed.

Based on the evidence provided in the DCO, the Inspector's questions, the pre-application discussions and our own expertise and observations, Stop Sizewell C and Theberton & Eastbridge Parish Council conclude that a twin reactor project at Sizewell cannot be realised in a manner which is safe and without significant impacts over the timescales envisaged between construction and final decommissioning.

We are unconvinced that the proposed development could prevent significant negative impacts on neighbouring coastal communities and adjacent designated habitats. The claim that biodiversity will be enhanced and that the project will demonstrate biodiversity net gain through distant, potentially inferior and yet to be established compensatory habitat creation fails to meet planning requirements and will do irreparable long-term damage in a time of an existing biodiversity crisis. The proposed development, from the start of construction and during operation would also result in irreparable damage to the East Suffolk visitor economy, which is to a large degree supported by the valuable natural habitats and rural landscapes our area has to offer.

Stop Sizewell C and Theberton & Eastbridge Parish Council also believe that the proposals are not consistent with what we consider to be important and materially significant policies in East Suffolk Council Suffolk Coastal Local Plan, in particular policies SCLP3.4 (Proposals for Major Energy Infrastructure Projects), SCLP3.5 (Infrastructure Provision), SCLP7.1 (Transport), and Policies MP3 and GP4 of the 2020 Suffolk Minerals and Waste Local Plan

**Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the cumulative adverse impacts of the proposed development on the community considerably outweigh the claimed benefits and conclude that the proposed development should be rejected.**

No attempt has been made to provide an individual community Impact Assessment for Theberton & Eastbridge, despite statements at Stage 3 that this would be done. (See <https://edf.thirdlight.com/pf.tlx/FVFMA3FMgCGVZ>, page 69, para 4.4.58).

Stop Sizewell C and Theberton & Eastbridge Parish Council have set out evidence in this document to show that the DCO should be rejected. Our reasons are summarised in the following:

## Summary of objections

### *Community Impacts*

The proposed development would have a significant and cumulative impact on local communities, in particular Eastbridge and Theberton and the several settlements along the B1122. We believe that a development of this scale, including the proposed Sizewell Link Road (SLR), would be totally inappropriate in this very sensitive rural and landscape setting which would be severely damaged during and after the construction of the plant, leaving a net adverse legacy for local communities and the important visitor economy badly damaged. Construction activities taking place over 10-12 years (or more) would be particularly damaging in the medium term as described below given also the failure of the proposals to properly mitigate their impacts particularly in the first two years of the project, known as the “early years”:

- *Accommodation Campus and Strategy*  
The development would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures. No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900 relying entirely on scant available low cost rental accommodation and increases in the houses of multiple occupancy in the area, impacting a vibrant tourism sector and the social housing sector. ***Is the applicant able to provide sufficient evidence that the proposed campus would not result in unacceptable harm to local communities and residential amenity?***
- *Borrow Pits and Spoil Management (Heaps)*  
This development would be inconsistent with adopted planning policies in the Local Plan and Minerals and Waste Plan and they are unacceptable due to its proximity to Eastbridge and several individual residential properties. Both proposals would have a significant adverse impact on local communities, inconsistent with policies MP3 and GP4 of the Suffolk Minerals & Waste Local Plan. The proposals do not adequately assess or satisfactorily mitigate (and address where applicable) any potentially significant adverse impacts. ***Is the applicant able to provide evidence that the proposed borrow pits and spoil management plans would not result in unacceptable, unmitigated***

***harm to local communities and residential amenity consistent with policies MP3 and GP4 of the 2020 Suffolk Minerals and Waste Local Plan?***

- ***Transport***

The amount of road based transport would have severe adverse impacts on local communities and result in long term damage to the East Suffolk visitor economy. The proposed delayed completion of the SLR until year 3 of the development will mean that the A12 through Yoxford and the B1122 will carry substantially increased traffic during the first three years of site development, including additional 200 HGV movements per day associated with the SLR's construction over and above the 600 HGVs associated with the early years construction at the Sizewell facility. Furthermore, the majority of the other proposed transport mitigations will not be implemented in the early years' timeframe, leaving consequential and unfair adverse impacts on communities and road safety. The situation will lead to increased and unmitigated community severance, noise and air pollution. It will increase road danger on a road that is clearly acknowledged by the proposed design of the SLR as unfit for the purpose of carrying heavy traffic. Construction of the SLR at the same time will create, in aggregate, a 'surround sound' of unacceptable noise and disturbance from all sides, affecting residents' enjoyment of living in their communities, their health, safety and mental wellbeing. The magnitude of these cumulative impacts has not been inadequately measured: the ES fails to consider the most sensitive times of day. ***Is the applicant able to show that the early years' transport impacts will be acceptable at all times of the day, and that the combined impacts of noise and disturbance from additional traffic and SLR construction (the multi-faceted 'surround sound' effect) will be within acceptable limits?***

The proposed route of the SLR itself is unacceptable. Alternative routes exist, in particular potential routes starting from south of Saxmundham. Alternatives have been dismissed as options by the applicant with no adequate reasons, insufficient evidence and contrary to the views of Suffolk County Council as Highways Authority. ***Is the applicant able to provide evidence that there has been a thorough examination of all SLR options and that the applicant's favoured option (route Z) is the best in terms of its community impact and legacy value?***

- ***Landscape***

The proposed development site is not suitable because it will not mitigate the visual impact on the nationally significant Suffolk Coast & Heaths AONB or the Suffolk Heritage Coast from the sea as envisaged by the Government in National Policy Statement for Nuclear Power Generation (EN-6). The AONB will also be split in two with significant ecological impacts for at least a century.

The proposed development and SLR do not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment' nor can it meet required increases in biodiversity for decades to come given the destruction of existing habitats on the development and operational site. It would also have an adverse impact on the quality and integrity of the many nationally and internationally important nature conservation areas. ***Is the applicant able to provide evidence that the proposed development would not result in extensive and irreparable long term damage to the East Suffolk landscape?***

- ***Built Heritage***

The proposed development would have significant and adverse impacts on the historic environment of East Suffolk and the setting of many significant built heritage assets, including the settings of St Peter's Church Theberton and Leiston Abbey. ***Is the applicant able to evidence that the proposed development would not result in unacceptable damage to East Suffolk's built heritage?***

- ***Environment***

Stop Sizewell C and Theberton & Eastbridge Parish Council strongly object to the Sizewell C DCO for numerous environmental reasons relating to pollution (air quality, light, noise, dust and particulates), flood risk, water supply, terrestrial ecology, marine ecology, Water Framework Directive and the mis-alignment of submission of Environmental Permits applications, the Nuclear Site License application and the DCO application. ***Is the applicant able to provide evidence that the proposed development would not result in extensive and irreparable long term damage to the East Suffolk environment?***

- ***Social Impacts***

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the proposed development would leave a legacy of adverse social impacts on communities. Communities would be impacted by the influx of construction workers and there are likely to be effects on health on the receiving communities and on the incoming workforce; effects on accommodation; effects in relation to temporary on-site accommodation; effects on local businesses including tourism and the local supply chain and displacement effects on the labour market. ***Is the applicant able to provide evidence that the proposed development and the influx of thousands of construction workers for a period of at least 10 years into an otherwise quiet rural locality will not have unacceptable social impacts on communities in East Suffolk?***

- *Cumulative Impact*

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast is highly significant as it would adversely impact the lives of Suffolk residents, visitors, the tourism and hospitality industry and the built and natural heritage for many years to come.

Cumulative impacts include Sizewell C, the operation of Sizewell B, the decommissioning of Sizewell A, the Scottish Power Renewables proposals for onshore wind farm infrastructure at Friston and other planned projects (Greater Gabbard, and Galloper wind farm expansions, Nautilus, Eurolink and two Sizewell to Kent interconnectors). The disbenefits to Suffolk life from Sizewell C and these other projects will be overwhelming and result in significant industrialisation of a rural area and landscape and biodiversity assets of national significance. ***Is the applicant able to provide evidence that there is no need for Government energy infrastructure policy to urgently address the cumulative impact of proposed energy infrastructure projects in East Suffolk?***

- *Draft Development Consent Order*

Stop Sizewell C and Theberton & Eastbridge Parish Council very much appreciate the insight demonstrated by ExA's questions so far and require the proposed provisions of the Draft DCO, prepared by the applicant, to be carefully scrutinised. This is because of the many and complex impacts on local communities most affected by the form of the proposed development and must not be used by the applicant as a way of expanding use of the Rochdale Envelope or avoiding scrutiny of critical infrastructure within the examination period. ***Is the applicant able to evidence that the Draft DCO provides sufficient protection for local communities for the period of construction and thereafter during operation?***

---

## **2. Qualifications for Giving Evidence**

### **Stop Sizewell C (Theberton and Eastbridge Action Group on Sizewell C Ltd)**

Theberton and Eastbridge Action Group on Sizewell C, an unregistered society, was originally created in 2013 to highlight how our community and the surrounding unique environment would be significantly and adversely impacted by the proposed Sizewell C development and to assist Theberton and Eastbridge Parish Council assess and respond to the proposed Sizewell C development project and also campaigns to highlight the impact of the build on local communities, on our local environment and on the local visitor economy.

In November 2019, the unregistered society was closed down and Theberton and Eastbridge Action Group on Sizewell C Ltd (Stop Sizewell C), a company limited by guarantee, was registered to continue its community work. **Stop Sizewell C is the campaign name of the organisation.** Stop Sizewell C Directors and Members function as a management committee.

### **Theberton and Eastbridge Parish Council**

This is the closest Parish to the proposed Sizewell C development with aspects of the construction site barely 250 metres from the village envelope and will be in the front line of construction for 10 or more years and will suffer greater cumulative impacts than any other parish in the area. Significant impacts will also be experienced from B1122 passing through the village of Theberton and the proposed SLR severing it's road connections to the west.

This representation has been prepared by:

Alison Downes, Executive Director, Theberton resident

Paul Collins, Director and Chairman, Parish Councillor, Theberton and Eastbridge Parish Council, Co-Secretary, Minsmere Levels Stakeholders Group, Eastbridge resident

Stephen Brett, Director, Chair of Theberton and Eastbridge Parish Council, Member of Minsmere Levels Stakeholders Group, Grazier, Eastbridge resident

Charles Macdowell, Director, Chair of B1122 Action Group, Middleton resident

Robert Flindall Dip EP MRTPI, Director, Member of Minsmere Levels Stakeholders Group, Eastbridge Resident

Richard Lewis, an independent town and transport planner (transport evidence)

We are indebted to many others for their contributions to this representation - too many to name.

---

### **3. Involvement with local organisations**

Stop Sizewell C has worked in partnership with Theberton and Eastbridge Parish Council, since 2013, to advise the community of Theberton and Eastbridge alongside other affected Town and Parish Councils, the B1122 Action Group and the Minsmere Levels Stakeholders Group.

Stop Sizewell C also works collaboratively with local NGOs such as RSPB, Suffolk Wildlife Trust, National Trust and other community groups such as Anglia Energy Planning Alliance and Together Against Sizewell C.

Stop Sizewell C and Theberton & Eastbridge Parish Council also maintain a dialogue with statutory consultees including Suffolk County Council, East Suffolk Council (and the former Suffolk Coastal District Council), the Environment Agency and Suffolk Coast & Heaths Area of Outstanding Natural Beauty as well as local District and County councillors, the constituency Member of Parliament and MPs for the surrounding impacted areas.

The views expressed in this response have been reinforced by joint public meetings with Stop Sizewell C and Theberton & Eastbridge Parish Council at St. Peter's Church, Theberton, during the extended consultation process and the Development Consent Order (DCO) process.

---

#### **4. Site and Surrounding Area**

The rural Parish of Theberton and Eastbridge is located in and adjacent to the Suffolk Coasts and Heaths Area of Outstanding Beauty, close to the North Sea and RSPB Minsmere nature reserve, and adjacent to very significant areas of wetland, heath and woodland.

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is situated about 4 miles north of the proposed Sizewell C twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village.

A Grade 2 listed Public House sits in the centre of the village, opposite the Grade 1 listed St. Peter's Church with its rare round tower and thatched roof plus a Grade 2 War Memorial. They are separated by the B1122.

The very popular village hall next to the church hosts a variety of activities from adult education classes to childrens' parties. Community activities centering on the hall include the Duke of Edinburgh award scheme which involves students camping and navigating the local footpaths and roads. A newly equipped and upgraded playing field for young children along Church Road is already much used.

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 complete the village picture alongside the local residents. Duke of Edinburgh students frequently use the small lanes and footpaths to Eastbridge.



Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street lights, street signs or speed limits. It borders an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest, which is the location of RSPB Minsmere. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, and two certified campsites where visitors come to enjoy the dark skies and 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 the National Trust's Coastguard Cottages at Dunwich Heath.

The villages have a mix of properties owned and rented into both the tourist and private rental sector. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, and the very varied wildlife associated with the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest.

Residents and visitors benefit from the proximity of Minsmere as well as other important destinations including the Leiston Long Shop Museum, the National Trust's Dunwich Heath, Walberswick Marshes and the towns of Leiston, Thorpeness, Aldeburgh, Walberswick and Southwold are also close by.

Theberton and Eastbridge are popular visitor destinations themselves as they are located midway between the popular destinations of Thorpeness, Aldeburgh, Walberswick and Southwold and an important part of the thriving East Suffolk visitor economy. Eastbridge is located just 400m from the proposed Sizewell C construction site (proposed borrow pits) and just 700m from the proposed residential campus. The two communities would be mostly impacted by activities on the Temporary Construction Area and the proposed SLR.

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) is a distinctive area of legally protected countryside, towns and villages in east Suffolk. It is cherished for its relatively undeveloped, tranquil landscape and stunning natural and cultural history. The AONB stretches from Kessingland in the north to Shotley Peninsula in the south, and is characterised by shingle beaches, heathland, forest, estuaries, arable and livestock farmland and iconic coastal towns. The AONB will be completely severed by the Sizewell C construction site for 10-12 years and permanently by the new access road from the B1122 to the SSSI crossing into the operational site.

RSPB Minsmere is the organisation's flagship nature reserve and visitor destination, attracting 125,000 people a year. RSPB Minsmere is internationally famous because of its successes in conservation of rare species since World War II. It has a long history of successful conservation in the UK and has become a place of international importance and significance to the history of conservation, including for very rare

breeding birds such as Avocet, Bittern, Marsh Harrier, Stone Curlew, Dartford Warbler, Woodlark and Nightjar and animals such as Red deer, badger and bats. The diversity of wildlife, flora and fauna, is reflected in more than 6,000 identified species.

Just this last weekend, 30-31 June, three Common Crane flew over and visited the Minsmere valley. These birds have been absent for many decades and are a welcome return to Suffolk and the east coast. They are known to be shy birds not comfortable with noise and light pollution. The Sizewell C development would put back such a return for at least a decade and possibly longer.

Damage to the Minsmere nature reserve complex would result in considerable harm to the local visitor economy because of reduced visitor numbers and, as a consequence, a reduction in spending on associated visitor accommodation, the service industry and town centres.

Stop Sizewell C and Theberton & Eastbridge Parish Council support the RSPB and Suffolk Wildlife Trust in their argument that damage to the nature reserve as a result of the proposed development would harm the UK's reputation in its attempt to provide world leadership in sustainable development, particularly in the run up to the UN Climate Change Conference in 2021 (COP 26).

---

## **5. Description of Proposed Development**

The proposed development is the construction of twin EPR nuclear reactors at Sizewell, on a site immediately to the north of Sizewell B and adjacent to the southern boundary of RSPB Minsmere and the Suffolk Wildlife Trust Sizewell Marshes SSSI. A host of related infrastructure away from the main development site is also proposed to serve the construction period and during operation (including road, sea and rail transport infrastructure, and park and ride facilities). In the Stage 4 consultation, EDF stated that the development would take in the region of 10 to 12 years to complete. The DCO also suggests a 10-12 year construction period.

The application site comprises a total site area of 1011.6ha; of which 371.7ha are onshore and the remaining 639.9ha are offshore. The temporary construction area extends across woodland plantations at Dunwich Forest and Goose Hill and relatively large arable fields defined by hedgerows and linear tree belts. The proposed construction site would extend from Sizewell B to the Eastbridge Road at map ref TM 453 655, just 250m from the southern boundary of the village.

In the Stage 3 consultation the applicant perhaps unwisely boasted that the amount of construction envisaged would be comparable to the 2012 London Olympics. This clearly illustrated that the scale of the proposed development would overwhelm a very fragile and precious rural environment. Transport to and from the site before and

after construction would predominantly be by road as well as by train and sea generating a huge number of vehicle movements each day. The construction workforce would be 7,900 workers at its peak, plus another 600 in supporting roles. Once in operation, the power station would create 900 permanent jobs. Worker accommodation would involve the construction of 30 blocks of 3 and 4 storey flats (up to 36m high) for 2,400 workers in a residential campus served by a new road junction off the B1122 and located 700m from Eastbridge. The nearest part of the campus to Eastbridge would comprise decked car parking (up to 20m high) for 1300 vehicles. The campus would house ancillary facilities for residents and would generate constant movement of workers to and from the site.

The applicant also proposes the construction of borrow pits just 250m from Eastbridge as part of its construction material plan. Storage of materials is proposed to be up to 20m high.

Temporary spoil management areas would be located 800m from Eastbridge and up to 35m in height.

Material management at the borrow pits and spoil stockpiles would result in very substantial loss of amenity in local communities, in particular at Eastbridge for the reasons we have described in Section 6.3 section below.

---

## **6. Elements of Concern to Stop Sizewell C and Theberton & Eastbridge Parish Council**

Stop Sizewell C and Theberton & Eastbridge Parish Council cite a number of issues that we believe are material to the consideration of this Development Consent Order.

The proposed development would have a strongly tangible adverse impact on the communities, landscape and socio-economic environment of East Suffolk both during and after construction, and particularly in the early years. For these reasons Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected. Our areas of concern were listed in the Relevant Representations submission to the ExA dated 30 September 2020.

This section of our representation is also based on the Planning Inspectorates *Assessment of Principal Issues* listed following the Preliminary Meeting and other guidance offered by the ExA since that time and covers the general theme of **Community Impacts**.

Stop Sizewell C and Theberton & Eastbridge Parish Council object to the DCO on grounds of jobs and economic development, national policy, climate change, cumulative impacts of energy developments in Suffolk, flooding, health, coastal

issues, including coastal geomorphology, site defence and natural heritage. Where these are not covered in this representation they are covered by separate Stop Sizewell C expert reports submitted alongside this representation to the Examination.

---

## **6.1 Local communities**

### **6.11 Summary of Issues**

Stop Sizewell C and Theberton & Eastbridge Parish Council are of the opinion that the proposed development would have a very serious adverse cumulative impact on local communities, in particular Yoxford, Middleton Moor, Eastbridge and Theberton and the several settlements along the B1122 and B1125. It believes that a development of this scale would be wholly inappropriate in this very sensitive landscape and precious rural environment which includes areas nationally and locally recognised in policy for their biodiversity and landscape value. These would be severely damaged for several decades and the visitor economy badly damaged permanently. The longevity of construction activities would be particularly damaging.

It should also be borne in mind that the cumulative impact of the Sizewell C development and the other onshore energy infrastructure projects proposed relating to the Sizewell B proposals, the offshore wind farm industry and the European and UK interconnector projects has not been adequately taken into account by the applicant and, indeed, the UK Government in its energy infrastructure planning.

Theberton and Eastbridge and the B1122 communities would experience considerable loss of the residential amenity that they currently enjoy because of noise, dust, light pollution and loss of dark skies, traffic movements, pollution from vehicle movements, the proximity of the proposed residential campus and the proposed borrow pits and spoil heaps and from the construction site generally.

The presence of thousands of construction workers for at least a decade and in what is presently a peaceful rural environment would be very damaging. For many older people in this community who have come to live in the area specifically because of the peace and rural tranquillity it offers, this situation would be for the remainder of their lives.

Stop Sizewell C and Theberton & Eastbridge Parish Council argue that it will not be possible for the applicant to protect the existing residential and rural environment, and it is not possible to provide adequate mitigation and compensatory legacy benefits. Moreover it is not possible for the authorities (Suffolk County Council, East Suffolk Council, NHS) to ensure the safeguarding of local communities or be adequately resourced to do so.

The final decision on the DCO will have a very considerable impact on the lives and livelihoods of local people. The proposed development would not just harm the B1122 and B1125 communities but also the communities in the wider East Suffolk area, including those that are dependent on the visitor economy and those impacted by transport for the duration of the construction period and during operation of the proposed Sizewell C development.

Stop Sizewell C and Theberton & Eastbridge Parish Council community impact objections to the proposed development are evidenced by Suffolk County Council in its Relevant Representations submitted on 28th September 2020 at

[Relevant Representation of Suffolk County Council in respect of the proposals for the Sizewell C Nuclear Power Station](#)

These state, amongst other things, that,

*“The Council does not consider the DCO proposals sufficiently avoid, minimise, mitigate, or compensate for the impacts it will have on the communities and environment of Suffolk. To be acceptable and to make the development work for Suffolk, it is essential that these impacts are minimised, by following the mitigation hierarchy (avoid – minimise - mitigate – compensate), prioritising sustainable transport modes and by addressing the sensitivity of its location and any community impacts arising.*

---

## **6.2 Accommodation Campus and Strategy**

**This part of the written representation covers the following subjects:**

**6.21 Local Implications**

**6.22 Waste and Recycling**

**6.23 Alternative locations**

**6.24 Suffolk County Council and Suffolk Coastal District Council and the proposed residential campus**

**6.25 AONB Partnership**

**6.26 Blighting**

### **6.21 Local Implications**

The proposed accommodation campus is for 2,400 construction site workers. If it is approved through this DCO process this part of the development would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures.

No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900. There is little scope to expand the campus site directly given the constraints on the site, so Sizewell C Co are relying entirely on scant available rental accommodation in the area, and using the housing fund partly

to identify and increase the availability of houses of multiple occupancy (HMO) particularly in the Leiston area (Table 7.1 [APP-613](#)) impacting the social housing sector and vibrant tourism sector.

## **6.22 Waste and recycling**

It is not clear what range of waste recycling and energy supply infrastructure is proposed on the campus; whether these facilities are interrelated (e.g. energy from waste facility) and how they will be managed and whether there would be an impact on local communities. There is reference to a “CHP” (combined heat and power) facility for the campus but only “if required” A.29.11 [APP-587](#) with no further details.

## **6.23 Alternative sites for the accommodation campus: Boyer and Canon for Suffolk County Council.**

Boyer and Canon Consulting Engineers (B&C) were commissioned by the County Council to assess whether there were any genuine alternative sites for the Sizewell C Accommodation Campus. This included the applicant’s preferred location. The County Council were keen to explore legacy potential and also the impacts on the environment and local communities.

The Boyer Sizewell C Accommodation Campus Review is at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/170711-FINAL-Report-Boyer-21.06.2017.pdf>

The study showed the applicant’s preferred site met its own criteria regarding proximity and efficiency but was less favourable when considered against impacts on communities and the environment. It concluded that there are other sites that would have reduced environmental impacts on the area and that could be considered as part of a full and proper accommodation strategy. The study concluded that the two Councils and the applicant should potentially discuss potential sites for an accommodation campus as part of that strategy.

So far, the applicant’s justifications for selecting the single Eastbridge Lane site are poorly evidenced and based on invalid reasoning. Section 2.2.5 in [APP-591](#) discusses the difficulties of mitigating impacts of large groups of workers in small rural communities. However, none of Sizewell C Co’s 3 optional sites nor the seven sites reviewed by the B&C report involve small rural communities. All the sites were either in, as close to or closer to Leiston as the proposed Eastbridge Lane campus or close to Saxmundham which cannot be considered to be a small rural community. Suggestions that a site which could leave a long-term legacy for affordable housing have been rejected without valid justification. In fact, Leiston East site, option 3 in Sizewell C Co’s Stage 1 consultation, rejected by Sizewell C Co because of a difficult access route across AONB land in the consultation documents, was rated well in the Boyer and Canon report but using a less impactful access route to King George’s Avenue. This site would offer a good potential legacy and is included in ESC and

Leiston Town Council's Local Plan as a potential site for future housing. The opportunity to provide a split campus with part of the workforce closer to a small town, rather than all close to the hamlet of Eastbridge, a situation Sizewell C Co seem to be striving for is all the more unfathomable. Assessment of the environmental impact and potential legacy of the Eastbridge Lane site is given in the B&C report as significant compared to Leiston East limited impact for both measures.

#### **6.24 Suffolk County Council and former Suffolk Coastal District Council views regarding the proposed Accommodation Campus**

Stop Sizewell C and Theberton & Eastbridge Parish Council welcome and support the Suffolk County Council and the former Suffolk Coastal District Council response to the Accommodation Campus proposals.

In response to the stage 3 consultation Suffolk County Council March 2019 Cabinet agreed the following:

*"The location of the accommodation campus remains a local concern: EDF Energy is requested to provide further evidence to demonstrate why it considers its favoured location to be the optimal location. This Council would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. This Council would like EDF Energy to also reconsider the nearby Leiston airfield site as an alternative location for the campus. Subject to receipt of that justification, whatever accommodation campus site is chosen the evidence will need to prove that environmental impacts can be sufficiently mitigated and compensated for".*

See Cabinet report at

<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/SCC-Cabinet-Report-Cabinet-Report-Sizewell-C.pdf>

In response to the Stage 4 consultation Suffolk County Council Cabinet also agreed that:

*"EDF Energy is informed that, in line with the position agreed at the Cabinet Meeting on the 12 March 2019, the Stage 3 representation submitted jointly by this Council and (then) Suffolk Coastal District Council remains valid with additional comments raised in the response in the Appendix".*

In response to the stage 3 consultation Suffolk Coastal District Council Cabinet received a report on the proposed Accommodation Campus that advised that the proposed location did not come without disadvantages given its sensitive location. Also that,

*"8.66 The proposed development is on a very compact site.... it does not give any scope for potential expansion should the workforce number increase from 5,400 to the higher number of 7,900 as tested within Stage 3..*

*"8.67 EDF Energy is requested to provide further evidence and a business case to demonstrate why they consider their favoured location to be the optimal location. The Councils*

*would like to see the evidence behind not choosing either Ipswich or Lowestoft for an accommodation campus. Suffolk County Council would also like EDF Energy to reconsider the nearby Leiston airfield site as an alternative location for the campus..... whatever accommodation campus site is chosen will need to prove that environmental impacts can be sufficiently mitigated and compensated.”*

In response to the stage 3 consultation, Suffolk Coastal District Council agreed the same recommendation as the County Council.

See ESC/SCDC Cabinet report at

<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/SCDC-Cabinet-Report-Agenda-item-6-CAB-23-19-Sizewell-C-Stage-3-Public-Consultation.pdf>

## **6.25 AONB Partnership Relevant Representations September 2020**

Stop Sizewell C and Theberton & Eastbridge Parish Council also support the AONB Partnership in its statement that:

*“the design of the accommodation campus does not pay due regard to the statutory purposes of the AONB. Although located outside the AONB this element is within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty characteristics ...*

See [Sept 2020 This representation is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty \(AONB\) Part](#)

## **6.26 Blighting**

Having taken professional advice in respect of property values in our parish it would appear over Sizewell C Co's consultation period, that although selling, properties have already already lost up to 10% of value against other areas outside those affected by Sizewell C and they are selling less quickly until reduced in price.

The Parish Council and individual Eastbridge residents have approached Sizewell C Co regarding our concerns. Unfortunately Sizewell C Co say they do not recognise blighting as houses within the village are selling and have also stated that they will not countenance purchasing a property that cannot be sold under any circumstances.

We have been referred to an EDF Property Price Support Scheme, but it is restricted to properties that lie within the site boundaries of the construction and works site, which gives no clear avenue of support for residents close to any of the various developments associated with this proposal who may be faced with financial difficulty or loss when selling their property which may be their only major asset.

We are aware that this was not the case at Hinkley Point where some properties were purchased by EDF in the early years of that project.



Although we are the closest parish to the development we have never had an impact assessment carried out for our community, promised during consultations by Sizewell C Co. In fact, the only reference in the DCO to impact can only be found in [APP-156](#) Section 4.6 “How Saxmundham might be affected by the Sizewell C Project” paragraphs 6:77 & 6:78 which says noise and vibration will adversely affect Eastbridge and two other specific locations both during construction and operation. The fact no promised individual impact assessments has been done for the nearest villages to the construction site and the fact that Theberton and Eastbridge Parish only get referenced in a Saxmundham impact report is doubly insulting considering that Saxmundham is over 4 miles away and Leiston barely 1.5 miles away. Also, Leiston’s boundary into Eastbridge along the eastern side of Eastbridge Lane and eastward to the coast. This is not a request to be considered as part of Leiston, but evidence of the complete lack of understanding by Sizewell C Co of the impact on the closest habitable parish to this project.

EDF should be required to do an impact assessment on our community which should include: - Pollution, Noise, Vibration, Traffic flows, Light pollution, Dust, Social cohesion & Mental Health

EDF should be required to evidence on what basis within an agreed radius of all works sites, why property prices will not be affected by Blighting caused by the period leading up to and over the construction phase and for permanent developments within that radius how compensation can be achieved.

**Conclusions:** See section 6.113.2 for Stop Sizewell C and Theberton & Eastbridge Parish Council’s reasons the DCO should be rejected for impacts relating to this issue.

---

## **6.3 Borrow Pits and Spoil Management**

**This part of the written representation covers the following subjects**

**6.31 Community Implications**

**6.32 Suffolk Minerals and Waste Local Plan - July 2020**

**6.33 Suffolk County Council and Suffolk Coastal District Council Response**

**6.34 Response to Applicant’s Proposals and 5th Consultation (Post DCO submission)**

**Conclusions**

### **6.31 Community Implications**

The proposed development would involve the excavation of substantial ‘borrow pits’ to the east of the approach road to Eastbridge. These would cover an area of 17 hectares and be excavated to within 2 metres of the groundwater level. The borrow

pits would be used to extract materials for the main construction site and thereafter to fill them with construction site waste to a height of 20m. The borrow pits would, at their nearest, be just 250m from houses in Eastbridge. The borrow pits, part of the planned earthworks for the development, would be constructed in year 1 of the development and be operational until year 5, a duration of 4+ years.

Immediately to the south of the proposed borrow pits and adjacent to the eastern boundary of the proposed accommodation campus the applicant proposes the construction of a temporary spoil heap of site materials covering an area of 25 hectares and up to a height of 35m. The closest spoil heap will be located just 750m from the southern edge of Eastbridge.

Stop Sizewell C and Theberton & Eastbridge Parish Council contend that this part of the development is unacceptable due to the impact of its proximity to Eastbridge, Leiston Abbey Historic Monument and several residential properties, contrary to relevant policies in the Local Plan and the County Minerals and Waste Plan.

### **6.32 Suffolk Minerals and Waste Local Plan - July 2020**

The National Policy Statement states that it is appropriate for other matters to be considered (as material) by the Planning Inspectorate. This must include relevant local policies from the key plans, including the [Suffolk Coastal Local Plan](#) and emerging Local Plan Review, the County's Local Transport Plan and the [2020 Suffolk Minerals and Waste Local Plan](#) and its emerging Local Plan Review, as well as other strategies such as the [East Suffolk Business Plan 2015-2023](#) and the [AONB Management Plan](#). Throughout this document we have referred to these documents as material policy considerations which can be tested against the DCO. Since a DCO consent has regard to but is not decided against the policies of the development plan we have pointed to 'consistencies' and 'inconsistencies' rather than 'compliance'. The Suffolk Minerals and Waste Local Plan (SMWLP) was adopted in July 2020. The SMWLP is part of the Development Plan and provides the framework for the determination of planning applications for minerals and waste development. Local communities will rely on the safeguarding duties of the two Councils and other statutory agencies to ensure that technical matters associated with this part of the development are addressed appropriately and that the Planning Inspectorate is able to be satisfied that the provisions of the Local Plan have been addressed in the context of the DCO.

The relevant parts of the Suffolk Minerals & Waste Local Plan are shown below

*"1.1 The Suffolk Minerals & Waste Local Plan (SMWLP) contains planning policies for determining planning applications for minerals and waste development..."*

#### **Policy MP3: Borrow pits**

*"Borrow pits to provide sand and gravel to serve major civil engineering projects will be acceptable as long as: a) they are within 10 km of the project site; b) the borrow pit is worked and reclaimed as part of the project; c) they comply with the general environmental criteria Policy GP4."*

**Policy GP4:**

*“General environmental criteria Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following: a) pluvial, fluvial, tidal and groundwater flood risk; b) vehicle movements,.....c) landscape character, visual impact, setting, and designated landscapes including Areas of Outstanding Natural Beauty .....d) biodiversity ..... f) historic environment, archaeology, heritage assets and their setting; ..... j) noise and vibration; k) air quality including dust and odour; l) light pollution; m) the local water environment; .....p) the differential settlement of quarry backfilling; .....Proposals should meet or exceed the appropriate national or local legislation, planning policy or guidance for each criterion, including reference to any hierarchy of importance. **Proposals should aim to achieve a biodiversity net gain.** Proposals should demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance, that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.”*

### **6.33 Suffolk County Council and Suffolk Coastal District Council response to the borrow pit and spoil management proposals**

The proposed Borrow Pits and Spoil Management issues have been addressed at appropriate times by Suffolk County Council and the former Suffolk Coastal District Council

Before adoption of the SMWLP the March 2019 Suffolk County Council Cabinet and the Suffolk Coastal District Council Cabinet on the Stage 3 consultation both agreed the following recommendation:

*“This Council requires additional information and evidence to convince it that the proposed borrow pits 6 and stockpiling will not have an unacceptable impact on the sensitive local environment (including on the AONB and the Royal Society for the Protection of Birds (RSPB) Minsmere) and on neighbouring land uses;..”*

<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Stage-3/Final-SCC-SCDC-Stage-3-Response-submitted.pdf>

The reports to each Council contained the following reasoned justification for the recommendation:

*“The Councils retain their concerns about the proposal of borrow pits in a location within or adjacent to the AONB, with possible as yet not identified, severe impacts on the AONB by changes to groundwater levels, and noise and vibration disturbance on the local wildlife. Equally, we are concerned about the visual and environmental health impacts of stockpiling at the proposed scale.*

*“We would like to stress that more detailed assessments are required for us to provide an informed response to EDF Energy’s proposals. To develop a full understanding of the spoil management proposals and their transport implications, we request an overview of the likely and worst-case scenario for the balance of materials .....We have some concern about the potential impact of stockpiles on adjacent uses – particularly the impacts of the main stockpiling area on the proposed accommodation campus and the stockpiling to the LEEIE on adjacent residential areas. Clarification is required in several other areas, including operating hours, depths of borrow pits, noise, vibration, air quality, lighting, stabilisation of stockpiles and groundwater movements.”*

## **6.34 Stop Sizewell C and Theberton & Eastbridge Parish Council Response to Applicant's Proposals and 5th Consultation (Post DCO submission)**

### *Borrow Pits*

The Wood Environment 2020 report submitted by EDF [APP-296](#) Appendix L, on Lime Stabilisation, states “No specific literature on the risks of increased alkalinity to sensitive receptors could be found”. Most literature concerns heavy metal contamination leachate rather than effects on sensitive receptors, such as the the Minsmere-Walberswick SSSI and Ramsar site. Lack of supporting literature does not suggest “that it is not generally a significant concern”, rather that it is not something that has been studied.

We remain concerned that there is a significant risk of pollution to the water table and support Minsmere Levels position within their Statement of Common Ground.

### *Managing Construction Materials*

The applicant proposes the addition of a new stockpile because of increased sea and rail deliveries and additional excavations to remove “incompetent crag formation” from the platform. Stop Sizewell C and Theberton & Eastbridge Parish Council continue to object to soil management in this form because of its environmental implication.

Stop Sizewell C and Theberton & Eastbridge Parish Council remain very concerned about the management and landscape visual impact of these stockpiles and spoil heaps, given their height compared to the otherwise relatively flat topography, as well as the clear potential for fugitive dust and sand on this dry and windy coast being blown onto adjacent designated habitats, residential and productive agricultural land. We note the proposed change to certain parameter heights and activities on the main development site to facilitate the construction process. And we strongly object to a further spoil heap up to 15m high for the many reasons discussed above.

**Conclusions:** See section 6.113.3 for Stop Sizewell C and Theberton & Eastbridge Parish Council's reasons the DCO should be rejected for impacts relating to these issues.

---

## **6.4 Transport**

**This part of the representation covers the following subjects**

### **6.41 Summary of Community Impacts**

**6.42 Transport evidence**  
**6.42.1 Introduction**  
**6.42.2 Policy tests**  
**6.42.3 Early years**  
**6.42.4 Sizewell Link Road**  
**6.42.5 Active travel**  
**6.42.6 Rail**  
**6.42.7 Beach Landing Facility**  
**Conclusions**

**6.41 Summary of Community Implications**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the East Suffolk transport network north of Ipswich is inadequate to cope with the proposed development, especially the A12 and A1094 and the B1122. Other B roads in the locality (B1125, B1119, B1069) would be similarly threatened with heavy traffic and associated congestion. There is also a complex pattern of historic, rural country lanes that would be impacted largely by vehicles not contracted to use either the B1122 or the proposed Sizewell Relief Road. Many of these roads would be impacted on occasions when road traffic incidents occur or simply to avoid the increased traffic on A12/B1122/SLR.

Stop Sizewell C and Theberton & Eastbridge Parish Council also believe that the proposed transport strategy for the development is inadequate and unacceptable. The development would give rise to substantial and adverse impacts on the transport infrastructure, and the applicant has not been able to mitigate these impacts. Indeed, there is almost no mitigation in the early years when the B1122 will be used for the bulk of site traffic, including up to 600 HGV movements daily as well as traffic supporting associated construction such as the SLR and the Rail Spur. The use of a mix of road, rail and sea transport; the worker accommodation strategy and the construction of new roads would be insufficient to prevent unreasonable damage to local communities and the East Suffolk visitor economy.

This situation would be considerably worsened taking into account the cumulative impact of this and other energy infrastructure projects that are proposed for the Leiston area (the 'Suffolk Energy Coast'). These could include the Scottish Power Renewables onshore wind farm proposals at Friston, existing wind farm expansions, various European and inter-UK interconnector projects as well as the approved Sizewell B works, already permitted to accommodate the Sizewell C development

**6.42 Transport evidence**

The following evidence has been compiled for Stop Sizewell C and Theberton & Eastbridge Parish Council and the B1122 Action Group by Richard Lewis MRTPI, a

town and transport planner with over 20 years working in the public, private and community sectors.

### **6.42.1 Introduction**

Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group object to the transport proposals set out in the Sizewell C project DCO for very good reasons relating to the quality of life of residents over a 10-12 year construction period and a future legacy for the Suffolk Coastal district as a sustainable destination for rural tourism. We refer in particular to the Inspector's questions TT.1 as issued on 21 April 2021 in response to the 2020 DCO and subsequently amended DCO documents submitted by the applicant, which reflect changes to proposed HGV movements and mitigations.

### **6.42.2 Policy tests: compliance with Government policy and consistency with the Local Plan as a material consideration.**

Our response is framed by two simple tests: whether the proposals have adequately mitigated substantial impacts on surrounding transport infrastructure in accordance with EN-1; and whether the proposals meet the reasonable expectations as set out in the Suffolk Coastal Local Plan, which, in the context of this being a national decision, we consider to be a material expression of local priorities.

#### *Overarching National Policy Statement for Energy (EN-1)*

National Policy Statement (NPS) Policy EN-1, subsection 5.13 Traffic and Transport acknowledges that the transport of goods, materials and personnel can have a variety of impacts on the surrounding transport infrastructure with potential economic, social and environmental effects. Therefore, the consideration of transport impacts is an essential *part of* the Government's wider policy objectives for sustainable development.

Paragraph 5.13.6 states that the IPC should ensure that the applicant has sought to mitigate transport related impacts, and that if measures are insufficient the IPC should consider requirements to address the shortfall including inviting the applicant to enter into relevant planning obligations or requirements.

The key national policy test is drawn from NPS EN-1:

- Has the applicant sought to 'sufficiently' mitigate the substantial impacts on surrounding transport infrastructure during the construction phase?

#### [Suffolk Coastal Local Plan 2020](#) (East Suffolk District Council)

We believe that, whilst the DCO is determined by the Secretary of State in accordance with national policy and the 2008 Planning Act and not by the local

planning authority, the Local Plan should nonetheless reasonably be considered at the very least to be a material influence in the DCO decision-making process, since it has been through a due process of evidence gathering, stakeholder engagement, policy development, examination and political decision-making.

Policy SCLP3.4 acknowledges that the Council is a consultee in relation to Nationally Significant Infrastructure Projects. In this role, the authority will take into consideration the nature, scale, extent and potential impact of proposals for major energy infrastructure projects including their cumulative impacts over time and eventual decommissioning. Bullet (b) seeks appropriate packages of local community benefit to mitigate the impacts of disturbance caused to those communities hosting the major projects; and bullet (i) seeks appropriate road and highway measures (including diversion routes) for construction, operational and commercial traffic during the construction, operational and decommissioning processes. Bullet (m) asks for cumulative impacts of projects to be taken into account to ensure that there are no significant impacts in aggregate.

- Has the applicant included a sufficient package of measures of local community benefit (including legacy benefits) to mitigate the impacts of disturbance from raised traffic levels?
- Do the applicant's proposals provide adequately for appropriate road and highway measures (including diversion routes) to mitigate highway and community impacts?

Policy SCLP7.1 (c) states that development will be supported where "all available opportunities to enable and support travel on foot, cycle and public transport have been considered and taken". Bullet (f) in the policy seeks the integration, protection and enhancement of public rights of way, and bullet (g) seeks to reduce conflicts between users of the transport, i.e. pedestrians, cyclists and drivers.

- Do the proposals (sufficiently) take into account the need to consider all available opportunities to incorporate measures that will encourage people to travel by non-car modes? We would add 'freight by rail and sea' to this consideration.
- Does the SLR proposal deliver the "integration, protection and enhancement of public rights of way?"
- Will the development reduce conflicts between users of transport?

#### *General performance against policy tests*

We believe that the above policy tests are not met by the proposals or their mitigation on the following grounds:

- With the exception of two new train paths, the proposed package of transport mitigation does not take effect until the main construction phase commences. Prior to this, in the ‘early years’, there will be an unmitigated increase in all construction related traffic on the B1122, which will bear the brunt of the development impact, as referred to in Inspector’s question TT1.95. We believe that this is contrary to EN-1 paragraph 5.13.6 as the main policy test, and is inconsistent with material Local Plan policies SCLP3.4 and 7.1.

*Should the DCO be granted, we require conditions that the mitigation package is delivered to an agreed level prior to Early Years commencement of the works (from 2023); this includes construction of an SLR and reopening of the branch line passenger station at Leiston with regular shuttle train services. Compliance with our requirements would be consistent with the policy tests set out above.*

- In the Early Years (and subsequently on the A12) development traffic will cause conflicts between road users, including fear and intimidation, contrary to the Local Plan policy SCLP7.1 described above. This is referred to Inspector’s Question TT1.112 which states that Chapter 10 of the Environmental Statement does not take into account times when vulnerable road users may be present (noting school access / egress times, for example). Questions TT1.117 and 118 refer to fear and intimidation effects and pedestrian amenity which, inconsistent with Local Plan policy SCLP7.1(g), will not be mitigated on the B1122 by measures to improve pedestrian, cyclist and equestrian safety.

*We require the applicant to undertake a new study which measures the likely impacts of its proposals at the most sensitive times – when most pedestrian and cycle movement is likely to take place, and to assess the decision not to build mitigations prior to the early stage of development at Sizewell.*

- Construction of the SLR will itself create unacceptable levels of noise and disturbance combined with the aggregate impacts of additional heavy vehicle traffic including AILs and SLR construction vehicles on the B1122. Together, these impacts will lead to a likely measurable impact on the quality of life of residents. In addition, the travel plan fails to cover staff working at associated development sites, as highlighted by Inspector’s question TT1.30. This fails to fully demonstrate that the proposals will be in compliance with EN-1 and consistent with material Local Plan policy considerations SCLP 3.4 and 7.1.

*Should the DCO be granted, we require a study to inform necessary measurable updates to the travel plan and, wherever appropriate and practicable, full mitigation of all impacts including those arising from staff working on associated sites.*

- In the early and subsequent years no effort has been made to consider opportunities to facilitate and encourage travel by active travel modes or by



train even to the northern park and ride. Indeed, overall, it is proposed to make conditions considerably *worse* for people travelling on foot, cycle or horseback. During the main construction phase, only a few active travel measures will be introduced, including a ban on driving to the site from Leiston. The SLR as proposed will sever or unacceptably divert a number of public rights of way and also some existing lanes, including Pretty Road, as highlighted in Inspector's question TT1.97.

There are other grounds for objection too, as set out in more detail below with supporting evidence drawn from the applicant's DCO submission. However, we also set out the community's requirements for acceptable mitigation should the DCO be granted. These are included in the remainder of this representation.

**As either stated or inferred throughout this document, Stop Sizewell C and Theberton & Eastbridge Parish Council and the B1122 Action Group oppose the development of the new reactor (Sizewell C) for various reasons, including transport. Our opposition on transport grounds stems from the likely adverse impacts of additional motor traffic, including HGVs, staff and non-HGV service vehicles and overnight rail movements and the inadequacy of the mitigation measures proposed to protect the affected communities living in the district. The proposals will have a significant adverse impact on the valuable tourism industry which relies to a great extent on East Suffolk's peaceful rural landscapes, country lanes, heritage and character.**

### **6.42.3 'Early Years'**

#### *Summary*

We are opposed to the absence of any meaningful measures to mitigate additional traffic flows on the B1122 in the early years of up to 600 HGV movements per day in addition to other new traffic, and the failure to assess Early Years traffic impacts at the most sensitive times. Contrary to both NPS EN-1 paragraph 5.13.6 and inconsistent with what we believe are relevant and reasonable material intentions in Local Plan policies SCLP 3.4 and 7.1, the additional traffic will, in our estimation, have significant adverse impacts on four settlements (Yoxford, Middleton Moor, Theberton east and west and Westleton).

At the same time, the proposed SLR will be under construction in a process that will itself produce significant noise impacts and an additional 100 HGV movements per day on the B1122 over and above the 600 required for site preparation at the Sizewell plant. We have found little evidence presented so far of adequate mitigation to protect sensitive receptors from traffic noise and pollution, even though measures such as acoustic fencing and double-glazing would likely prove to be effective.

Should the DCO be granted, we believe that the applicant should enter into obligations and conditions requiring a package of mitigation measures to be implemented *prior to early works* commencing at the main application site. These include:

- The construction and opening of a SLR, the park and ride car parks and associated bus and rail services ready to operate on commencement of early works at the main site.
- Re-opening and extending the freight railway line ready to operate prior to commencement of the early works on the main site.

### *Early phase mitigation as proposed in the DCO*

In the early phases of the development, in the first two to three years (2024-2027) prior to construction of the relief road and park and ride sites, there will be no mitigation provided by park and ride or bus services associated with the development proposals, and no relief road onto which to divert HGV and other site traffic. Indeed, the bulk of mitigation measures will be under construction during this period.

We believe that this situation does not meet the policy test in NPS EN-1 paragraph 5.13.6 which requires proposed developments at the national scale to mitigate substantial impacts on the surrounding transport infrastructure. It is also inconsistent with the material Local Plan which requires the mitigation of transport impacts including 'every opportunity' being taken to implement sustainable transport measures. We believe that the failure to mitigate all of the impacts arising from additional traffic on the existing road network prior to the early construction phase will result in significant cumulative impacts.

Our arguments that the key policy tests described in the first part of this submission are not met in the Early Years centre around the following issues:

- *Noise and disturbance:* Construction of transport mitigating measures including the relief road, park and ride, online improvements to the A12 and the impacts of additional traffic are proposed to commence during, rather than prior to, the first three years of construction at Sizewell. This means that residents of Middleton Moor, Yoxford and Theberton will be subject to increased traffic levels during this period as well as new noise and air quality impacts arising from the construction of the relief road and changes to B1122 junction layouts with the B1125 to enable an unwanted connection between the B1125 and the SLR. Impacts from additional traffic and construction noise will together have a severe detrimental impact on residents' safety and quality of life, amounting to 'surround sound' from all sides of some receptors. This is

contrary to the intentions of NPS EN-1 as a whole and also the intentions of Local Plan policies SCLP3.4 and 7.1.

*This situation could be substantially avoided if the SLR is constructed in advance of the early years' construction at Sizewell.*

- *Traffic generation:* Traffic on the A12 will increase, with 85% of currently projected HGV traffic entering the B1122 from the south via Yoxford, and 15% from the north (Transport Assessment Addendum [AS-266](#) 8.2.45). This will have significant adverse impacts on residents in Yoxford who are already subject to heavy traffic on the A12. Furthermore, it will increase congestion, air pollution (NO<sub>2</sub> and PM) and road danger at the A12 / A1120 junction in the village which has very limited visibility for drivers turning right towards either Peasenhall (west) or Saxmundham (south). This is inconsistent with Local Plan policy SCLP7.1(g) with regard to conflict between road users. ES vol 2 ch 11 ES vol 10 ch 2
- *Access and egress from the B1122:* Residents' experience of living alongside the B1122 with current low traffic levels is telling. There are many unsafe junctions and entrances along the length of the B1122. Regular road users and residents have, over time, developed safety strategies based on the current low volumes of traffic. Mirrors are used, although these are frequently misted by rain, frost and dew. Another approach is listening for traffic, but the planned volume of traffic will prevent this strategy. Some residents cope by turning left onto the road and then turning around at the next safe opportunity rather than attempting a right turn across traffic. This situation may explain why an AECOM engineering study commissioned by Suffolk County Council estimated that an SLR would save a net 103 collisions and 158 associated injuries and fatalities.
- *Non-motorised modes:* The projected increase in traffic means that conditions for walking and cycling are likely to be severely affected. This is important since it is very clear that the tourism economy benefits from people travelling to enjoy the popular and well used rural road and public rights of way networks, including the B1122 itself, on foot, cycle and horseback and thereby to enjoy the landscapes and areas of natural beauty that are characteristic of the district. Contrary to EN-1 and inconsistent with Local Plan policy SCLP7.1(c), the proposals not only create barriers to active travel; they also fail to explore all opportunities to implement measures that will encourage people to travel by non-car modes. The proposals fail to set out any measures to mitigate the impacts of the development with regard to safety and access by public transport, cycling and walking during the early phase of development.

We anticipate that the reality and perception of road dangers to pedestrians, cyclists and equestrians will increase. There are several sections of road with residential frontages but no footway, or inadequate unmaintained footways, and heavy traffic is not conducive to cycling or horse riding.

*To support safer and more comfortable conditions overall, should the DCO be granted with no change to the proposed the use of the B1122 in the early years, we require camera-enforced 20mph village speed limits and a 40mph speed limit between the villages, together with extensive improvements and additions where necessary to pedestrian footways and crossings – noting that these will only ever serve as partial mitigation of the likely impacts.*

Two of the issues outlined above – noise and traffic generation – are described in more detail as follows:

### *Noise*

Noise has a minor, moderate or significant impact on people's quality of life and mental health, as described in the Environmental Statement Volume 6, Chapter 4 Noise and Vibration ([APP-451](#)) During the day, residents will be subjected to noise from the B1122 and SLR construction activities.

The document states that there is no means of aggregating road noise and construction noise since these are experienced in different ways (paragraph 4.6.10); even so, it ventures that the predicted significant effects are "unlikely" to combine with construction noise in a way that would change the significance of either of the two sources, since construction noise would be considerably more than the road noise, in other words, it would drown it out. However, even if the ES (at paragraph 4.6.11) is correct to say that the combination of construction and road noise does not add significance, we nevertheless put it to the applicant that the aggregation of all impacts adds up in total to a significant adverse effect on people's quality of life in this rural area – and that these impacts have not been taken into account. Indeed, Inspector's questions TT1.112, 113, 115, 116, 117 and 118 all refer to assessment times and impacts that are not adequately covered by the ES, including fear and intimidation from traffic, pedestrian amenity, and impacts at times when vulnerable users are most likely to be present on the network.

Relief road construction will add noise disturbance during the week, adding to increased ambient noise from the B1122, effectively surrounding residents with noise so that certain noise receptors have no 'quiet side', even if one side of any receptor experiences 'insignificant' noise impacts. The Environmental Statement ([APP-451](#)) sets out values for construction noise generation during two periods of construction – the site preparatory works and main construction phase. During construction, the site will operate six days per week (Mondays to Saturdays) from 0700 until 1900 hours. During the main construction phase, 29 of the 41 sensitive receptor sites will

experience major or moderate adverse noise levels on Saturdays, and 18 of the 41 receptors will experience **significant** noise effect during the week, taking into account differences in severity thresholds during the week and at weekends. Noise levels are considerably less during the site preparation period, with four sites affected at weekends and one during the week.

#### *Traffic generation and impacts in the early years*

Table 8.5 in the Sizewell C Project Transport Assessment Addendum ( [AS-266](#)) suggests that compared with background traffic in 2015:

- At Theberton, there will be a 20% increase in traffic between 0800 and 0900, and a 51% increase between 17:00 and 18:00, including all vehicles and demand from Scottish Power. This translates, respectively, to an increase of 900 and 2,750 vehicles passing through the villages during these peak periods.
- Table 8.4 suggests that over a 24-hour period on the B1122 traffic will increase from 6,050 vehicles (2023 reference case) to 7,900 vehicles, an increase of 1,850 vehicles or 30.6% at Theberton and from 4,150 vehicles to about 5,375, an increase of 1,225 vehicles or 29.5% – significant increases that will have substantial adverse impacts on quality of life in Yoxford, Middleton Moor, Theberton and other locations on the B1122 where the route passes close to people’s homes. The B1122 carriageway is narrow, typically 5.5m-6m wide, with intermittent footways, and blind hills and tight bends.
- At Yoxford (site Y), there will be a 7% increase in traffic between 0800 and 0900, and a 16% increase between 17:00 and 18:00 including all vehicles and demand from Scottish Power. This translates, respectively, to an increase of 80 and 200 vehicles during these periods. We are not certain that the representative times used are actually peak travel times with regard to shift changes and operations.
- Table 8.4 suggests that over a 24-hour period, traffic on the A12 at Yoxford will increase from 15,700 (2023 reference case) to 17,350 vehicles (high estimate), an increase of 1,650 or 10% over and above an already high traffic flow, adding to road danger at the A12 / A1120 junction with its limited stopping sight distances. It is already reported that flows regularly exceed the capacity of the single carriageway road at peak times with congestion extending over 350m from the B1122 junction without the proposed increased Sizewell C traffic.

- Meanwhile, due to the 24-month construction of the relief road, a further 200 HGVs (total two-way flow) will pass along parts of the B1122 between Yoxford and Leiston each day. These will be involved in all earth moving and construction activities.

The Environmental Statement ([APP-198](#)) at paragraph 10.3.11 classifies increases in traffic flows of above 30% as being perceptible and therefore subject to impact assessment. Below this level, the impact is considered imperceptible and is therefore not assessed. Flows very close to this magnitude will be experienced in one direction at Theberton.

The ES also measures the magnitude of transport based on seven criteria, namely severance, driver delay, pedestrian delay, pedestrian, cyclists and equestrian delay, fear and intimidation, collisions and safety, and hazardous loads (Doc 6.3, table 10.2). Only 'severance' and 'fear and intimidation' have clearly classified objective levels; the remainder are classified as either 'very low impact' or 'subject to judgement'.

It finds that across the rural areas affected by the proposals there are mostly related to there being instances of no pedestrian footways alongside carriageways that may be carrying increased traffic volumes including HGVs. This is particularly the case with the B1122 and its tributaries which will be carrying additional traffic in the 'Early Years' due to construction of the SLR. Our observation is that the footways which do exist are narrow, interrupted, often missing where there is frontage development, and largely unmaintained: they are not generally suitable for particularly vulnerable members of the community, namely young children, older people, and disabled people with restricted mobility.

#### **6.42.4 Sizewell Link Road**

##### *Introduction*

The SLR (applicant's preferred alignment) is proposed as part of the integrated package of measures to mitigate flows of additional vehicular traffic during the main (later) phase of construction and to provide access in legacy thereafter.

The requirement for a link road to protect villages from additional traffic is consistent with EN-1 and was established late in the public engagement phase. A link road is accepted in principle by Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group as an essential component of the Sizewell C project, should the DCO be consented, but this is not the route that they consider would have the least damaging short and long term impact and have the greatest potential for legacy.

The road is intended to provide a connection to the construction site for day workers and heavy goods vehicles. The main alignment runs south-eastward from the A12

south of Yoxford with spurs linking to the B1122 and A12 north of Yoxford and the B1125 from Westleton which will be used mainly by cars. In effect, the SLR provides western and southern bypasses for Yoxford, Middleton Moor and Theberton. Theberton and Eastbridge Parish Council believe that connecting the B1125 to the SLR will encourage additional traffic to use the B1125 from the north increasing impacts in Middleton and Westleton. This connection will introduce a staggered junction between the existing B1122 and the B1125 and given the early years use of the B1122 for traffic to the site will be a major disruption in both the short and long term. Removing the connection will likely encourage all traffic from the north to use the A12, new Yoxford roundabout and link on to the SLR.

The SLR is proposed to provide the principal route for park and ride buses arriving from Ipswich and Darsham as well as freight traffic and other vehicles going to and from the Sizewell application site and temporary site workers' accommodation situated to the south-east of Eastbridge, which will include a 1,400 space multi-storey car park. There will be traffic movement associated with employees when they are not working on site – these may be in the evenings or at other times between shifts, or on 'days off'.

Our principal objections to the mitigation as proposed are as follows:

- Inadequacies with the chosen alignment, which duplicates the existing B1122, within 150m in places, and would therefore leave no useful legacy for local communities upon completion of Sizewell C. In this regard we agree with the Highway Authority and contend that it provides poor value for both impact and money. Insufficient attention has been given to the possibility of an alternative route from the A12 south of Saxmundham.
- The design of the SLR, which is to be constructed to DMRB standards with a design speed of 60mph, is characterised by engineering features that are visually inappropriate in an area of locally acknowledged landscape value. These include multiple embankments up to 3.5m high and cuttings up to 3.5m deep for approximately 80% of its length. We believe that this level of engineering is excessive, and that a more sensitive and appropriate solution should be found – but it does underline the principle that the B1122 is wholly unsuitable for the type of traffic the SLR is currently designed to accommodate.
- The road design creates effective severance or diversion of public rights of way and several lanes which are popular and well used by local people and form part of the area's innate appeal to tourist visitors. A total of 12 public rights of way are affected, with a number diverted quite some considerable distance from their current alignments. We contend that the longer diversions, of between 100m and 250m, are unlikely to be attractive compared with the

current alignments through open countryside, and this is unacceptable given the importance of footpaths (at least one of which is promoted as a recreational circuit by Suffolk County Council) and also Local Plan policy SCLP7.1.

### *Proposed alignment*

On the face of it, the selected alignment makes some sense since it acts as both a bypass for the affected villages and as a collector for traffic arriving via various routes. However, it is the joint view of Suffolk County Council, Theberton, Middleton and Yoxford Parish Councils, Stop Sizewell C and Theberton & Eastbridge Parish Council and the B1122 Action Group that the adverse impacts of the proposed road outweigh the benefits, even though the preferred alternative route might add some add traffic to the B1122 for the full 10-12-year construction period.

The road will create a barrier dividing the parishes of Theberton, Middleton, Yoxford and Kelsale, splitting outlying homes and farms and creating a ribbon of unusable small fields between itself and the B1122 – in an area with good agricultural land. The road will also have a greater impact on heritage assets than EDF suggests.

We agree with Suffolk County Council, East Suffolk District Council and Create Consulting (acting on behalf of landowners) that weak and insufficient evidence had, at the time of their relevant representation, been submitted to the examination by the applicant regarding alternative alignments for the link road, particularly those alternatives which start to the south of Saxmundham. The document, AECOM Sizewell C Proposed Nuclear Development Peer Review of Option Selection for SLR, prepared for EDF Energy in April 2019 appears biased towards the chosen 'route Z' underplaying the magnitude of impact on sensitive noise and air quality receptors. It claims a non-existent 'legacy benefit', while giving emphasis to relative visual impact as means of dismissing other options, particularly a route 'W' which is favoured by the community and takes an alignment starting south of Saxmundham. The report's conclusions were based on a scoring system that, in the Highways' Authority's view, was not sufficiently evidence-based and therefore, not 'considered sufficiently robust'.

The review does not consider the opportunity of deliver an alternative alignment and road that will assimilate more successfully into its surroundings, which is designed with due consideration of police concerns about HGV movements and road danger and which provides a positive and, above all, useful and adoptable legacy for Suffolk coastal communities in exchange for undoubted ongoing impacts while serving 'Energy Coast' projects and Sizewell's operational requirements once the reactor is complete. It is convenient for the case made by the applicant that the road is proposed to be designed to DMRB standards when a more sensitive design would be more fitting in its rural context. If the B1122 can be used, highly inappropriately, in the early years, why can't an enhanced, safer and more appropriate and sensitive design



of a rural B road be used as a new SLR for Sizewell C construction and subsequent operation?

The case for an alternative alignment constructed to enhanced ‘rural B road’ standards (with a lower speed limit) is strengthened by proposed changes to the freight strategy ([AS-280](#)) and the HGV limits set out in the Construction Traffic Management Plan ([APP-608](#)), now reflected in the Transport Assessment Addendum ([AS-266](#)), which suggests that as a result of the preferred expansion of the BLF and increased rail traffic, HGV movements will be at the reduced rate of 500 movements per day during the peak construction period (100 fewer than in the early years) and a maximum of 700 movements on the busiest days, with 85% of HGV traffic arriving from the south. Overall, this changes the modal share of HGVs from the 60% assumed in the DCO to 40% (or a range between 30% and 50%). HGV flows will be significantly less than proposed in the original application with a reduced effect on the road network. The BLF is anticipated to run at 70% of its potential capacity, taking into account seasons, weather and other stoppages.

Reduced HGV traffic on the SLR provides a greater opportunity to design a road of rural character that is better assimilated into the landscape, and which can avoid sensitive receptors. The reduction of HGV flows overall includes a possible proportionate reduction in the number of HGVs arriving from the north, making their impact on the B1122 more acceptable if the SLR is routed from the A12 south of Saxmundham. However, as the Inspector points out in question TT1.94, it is not known where other, non-HGV vehicles will come from.

In its analysis of previous road options, the B1122 Action Group noted that in terms of impacts on households and landowners, ‘Route W’ had a number of clear advantages over and above ‘Route Z’:

<b>Receptors</b>	<b>‘Route W’ North</b>	<b>Sizewell Link Road (Route Z)</b>
Homes within 50m	0	2
Homes within 250m	3	33
Listed buildings within 750m	41	46
Length (new road)	8 km	7 km
Travel distance from south (Friday St roundabout to site entrance)	10 km	15 km

% share embankments and cuttings	c. 20%	80%
Special Landscape Areas (SLA)	Passes c200 m north of SLA	Abuts SLA in 2 places
PRoW affected	12	11
Community legacy value	Substantial	Nil
Utility for other energy projects	Substantial	Very limited

*If the DCO is consented, we require the applicant to undertake a detailed review of options to construct the link road from the south and a design which is better assimilated into the rural landscape, which leaves a positive legacy for the Suffolk Coastal sub-district.*

#### *DMRB engineering design*

We strongly object to the proposed design of the SLR (all options) “to DMRB” standards. On the basis of projected reductions in HGV traffic during the main development phase, we believe that *should the DCO receive consent, a road design that is more fitting in its landscape context should be possible subject to safety auditing the careful application of measures including lower speed limits, maximum corner radii, stopping sight distances and appropriate carriageway widths.*

This would substantially address the acknowledged visual and other environmental impacts of the ‘full’ DMRB design that is proposed, whilst providing a stronger legacy for local communities and the tourism industry without adverse impacts on road safety. A cycle track that may also be used by pedestrians, designed to LTN1/20 standards and properly surfaced, should be included within the highway envelope, perhaps behind a hedge. We recommend that the road operates within a design speed and maximum speed limit of 40mph throughout.

#### *Traffic generation*

The Transport Assessment Addendum ([AS-266](#)) provides information about projected traffic levels on the B1122 in the Early Years, including a 2023 ‘reference case’ which takes into account background traffic growth in 2023 as a baseline. We have used the 2023 baseline to calculate the increase in traffic overall and also on the B1122 if an alternative route for the link road is implemented.

Table 8.4 provides the 2023 baseline and additional 24-hour traffic levels on the B1122 prior to construction of the SLR. Early Years projected traffic increases

between 0800 and 0900, and 1700 and 1800 are expressed as percentages in table 8.5 - see our section 6.42(3) above.

Table 8.6 provides projected 2028 'peak' traffic flows with the SLR at key points on the network including the SLR. However to give a broader picture, we have used the 2023 reference case from table 8.4 to calculate residual traffic on the B1122 should the SLR be built on an alternative alignment:

- At site (R), B1122 east of Yoxford, traffic levels are expected to increase from 4,150 in the 2023 reference case to 4,600 vehicles, including 750 Sizewell C vehicles and 50 Scottish Power vehicles. This is an overall increase of 450 vehicles per 24 hour period on this stretch between Yoxford and the B1125 west of Theberton.
- At site F, the B1125 at Westleton, traffic levels will increase from 2,700 vehicles to around 3,225 vehicles, including 350 Sizewell C vehicles and 100 Scottish Power vehicles. This is an increase of 525 vehicles.
- The total traffic increase on the B1122 at Theberton would therefore be 975 vehicles. It should be noted that the 2028 'reference case' probably includes natural traffic growth as well as traffic added by the early stages of development, but this is not made clear in the assessment.
- If route Z is implemented, traffic on the B1122 at Theberton would reduce from 6,050 vehicles in 2023 without the SLR to 500 with the SLR in place.

*Should the DCO be consented, the community is content that the additional projected traffic flows on the B1122, if correct, are acceptable for the full construction period as an exchange for constructing the SLR prior to early stage development and on a different alignment starting south of Saxmundham.*

#### *Noise and pollution*

Please refer to *Proposed transport impacts: early phases* above. The impacts relate to road construction activity on sensitive receptors, aggregated with the various impacts of additional 'Early Years' traffic on the B1122. Note that the applicant has relied for its data on national standard SOAEL noise levels which will not take into account prior noise levels in the area.

However, the road itself, once complete, would present ongoing impacts on sensitive receptors since it is proposed to be used for extended operating hours. This will affect at least 35 homes within 250m of the route, which may be classified as sensitive receptors. Due to refraction (the movement of sound between warm air and cool air causing a shortening of sound waves), the impact of noise and disturbance will be greater at night.

#### *Severance*

Active travel is an important component of East Suffolk's tourism economy, with our observations noting that cycling and walking are particularly popular due to the network of lanes and public rights of way. Taking into account other impacts, the proposals will make the area less attractive to visitors, and the loss of public rights of way will have an adverse impact on the health and wellbeing of walkers, cyclists and equestrians at a time when inactivity and obesity are directly associated with one in six deaths in the UK, the highest rate in Europe

<https://www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health>

Many footpaths in and around Sizewell are interlinked. Removing and closing important path arteries such as Bridleway 19 removes access to permissive ways once owned by the Forestry Commission as part of Dunwich Forest and granted in times before the applicant became influential in the management of this land. Goose Hill, Kenton Hill and footpath 21 to the beach inexorably diverted, in some cases blocked, in some cases access lost forever.

Horse riders, cyclists and walkers use these amenities intensively. Their loss or temporary closure would be a massive loss to the community. Many ancient hedges along FP19 are very valuable to the landscape and contain many veteran trees.

The proposed SLR and the rail extension will effectively block and stop up BR19 by traversing it. BR19 serves grade 2 listed Upper Abbey Farm and Ashwood Cottages and is known as an ancient part of the Black Walks. This possibly connected many hundreds of years earlier Leiston Abbey with Dunwich, a once thriving port, via FP 20, Eastbridge to the beach sluice, or alternatively diverting half way along to the main ancient Dunwich Highway. BR19 is an ancient historic footpath as signified by the number of established and historic hedgerows and trees a habitat for bats, insects, larger mammals and birds.

Document 2.4 ([AS-113](#)) provides maps of PRoW diversions and stopping-up that will be caused by the DMRB design of the proposed SLR. The longer permanent PRoW diversions required are between 100m and 270m with several very convoluted routes being offered instead, including two instances of a highway being converted to a footpath. This is strongly inconsistent with East Suffolk Local Plan policy SCLP 7.1(f) which seeks the integration and enhancement of the public rights of way network. The diversions and stopping ups would have an appreciable and unacceptable impact on the enjoyment of the countryside and the public rights of way network as well as undermining efforts to encourage and facilitate more active travel for recreational, tourism and utility purposes. Taken together, this amounts to a potentially serious impact on the attractiveness of the area and therefore the viability of hospitality and other businesses that depend on tourism revenues – when these businesses may already be struggling to emerge from the Covid-19 pandemic.

Similarly, document 2.4 also maps a number of rural lanes that will either be stopped-up or diverted onto staggered or single-armed priority junctions with the SLR, reducing local permeability and further affecting the continuity of the network for pedestrians, cyclists and horse riders. Whilst it is understood that safety is a key driver of these changes, the proposals fail to consider mitigations or a positive future legacy of the road scheme for local communities and will have a serious barrier effect during and after construction. Given the local importance and indeed the heritage of Suffolk's dense network of attractive rural lanes, this situation is unacceptable and inconsistent with the Government's broader stated intentions for sustainable development referred to in NPS EN-1 and Local Plan policy SCLP3.4(b).

### *Heritage*

In the Heritage Assessment, consultant Richard Hoggett found that, in considering the applicant's comparative assessment:

*"The comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W [previously presented] reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from EDF Energy's reckoning of the total number of affected Listed Buildings and their grades. This inclusion of these figures alters the picture somewhat, and suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined.*

*"The comparative assessment [as presented at the time] has indicated that while the likely heritage impacts of Route Z and the northern version of Route W are superficially very similar, when the study area of Route Z is calculated appropriately, the southern variation of Route W has the least heritage impact, with the northern variation of Route W also having a marginally lesser heritage impact than Route Z."*

#### **6.42.5 Active travel**

A number of measures are introduced to support walking cycling, as outlined in the Construction Worker Travel Plan (document 8.8). Combined with providing accommodation close to the worksite, these measures are welcome in principle as they will connect the site to where people are living and they will leave a useful and positive legacy for the community. Additional active travel measures are proposed in Leiston and a s.106 fund is offered to support active travel around Wickham Market. However, the measures have a number of shortcomings that will undermine the good intentions of the travel plan:

- From the drawings we have seen, the proposed cycleways do not meet the layout or geometric design requirements set out in Local Transport Note 1/20 and CD1/95. Experience shows that 'shared use paths' do not attract cycling,

and neither cyclists, pedestrians nor equestrians like sharing the same space, so, wherever possible, segregated infrastructure should be specified. Many of the proposed shared use paths are directly adjacent to carriageways and heavy traffic when a soft buffer should be provided both to assist perceptions of safety and to 'catch' road grit and other debris. At junctions it is clear that active travel infrastructure has been 'retrofitted' onto the proposed DMRB designs which owe more to prioritising motor vehicles than emphasising the role of active travel in reducing congestion, health and climate impacts.

We believe that poor design of active travel infrastructure is unacceptable given the availability of comprehensive design guidance. Therefore, *should the DCO be consented, we require a condition that the applicant must review the designs in line with Government guidance in LTN1/20 and CD1/95 as a minimum standard for implementation consistent with Government policy.*

- There is no proposed active travel infrastructure to provide mitigation for existing communities against likely heavy traffic. Existing footways are in poor condition and mostly absent, with particular issues of missing footways along built frontages. This reflects our wider concern that the area will become less attractive to visitors who enjoy exploring the sub-district by active modes of transport.

For example:

- Nothing is proposed in the early stages to mitigate the impacts of increased motor traffic on the B1122 in the absence of a link road, park and ride and other travel plan measures. Conflict along the B1122 will increase, leading to a higher risk of conflict between drivers, pedestrians, equestrians and cyclists using the route.
- No provision is made on the proposed SLR or its crossings to safely accommodate active travel modes except near to the Sizewell C worksite. This includes a failure to maintain accessible routes across the road where local lanes have been stopped up (which may also be contrary to the Equality Act 2010 with regard to disabled users).
- The design of roundabouts and other junctions would leave vulnerable road users exposed to unpredictable, fast-moving vehicles on all arms, making it impossible to cross safely. There is no reason for junctions to be designed in a way that gives such a level of priority to motor vehicles that vulnerable road users are essentially designed out.

In Cambridge, failure to deliver active travel infrastructure in accordance with the provisions of LTN1/20 has been used in support of a planning refusal in respect of a major development close to the main railway station (Planning reference 18/1678/FUL – notes of committee meeting here:

<https://democracy.cambridge.gov.uk/ielIssueDetails.aspx?Ild=24651&Opt=3>). We trust that impacts on active travel will be taken into consideration by the Inspector.

*Should the DCO application be consented, we require the following additions supported by a comprehensive Local Cycling and Walking Infrastructure Plan that meets the requirements of Local Transport Note 1/20, which:*

- *Establishes and audits existing networks and conditions for safe walking, cycling and horse-riding activity (non-motorised users – or, as described here, ‘active modes’). This includes the network of existing lanes, roads, PRoWs and walking core zones (near to town centres and major walking trip generators).*
- *Identifies new links in the network to overcome barriers and respond to desire lines.*
- *Establishes a delivery programme of prioritised works to be delivered prior to early construction to serve the Sizewell campus that will leave a suitable legacy for communities following completion of Sizewell C, comprising measures including:*
  - *Quiet lanes.*
  - *Improved and extended rural footways.*
  - *Accessible bridleways and footpaths with some sections hard-surfaced to enable utility access on foot and cycle.*
  - *Junction treatments that enable active travellers to safely interact with major roads when crossing or turning into junctions.*
  - *Segregated active travel ways on main roads including the proposed SLR (shared surfaces outside of built areas, and segregated walking and cycling infrastructure within built areas)*
  - *Grade separated and / or controlled active travel crossings and other means of crossing major road barriers without requiring unacceptable deflections from desire lines. This includes designing major roundabouts to LTN1/20 or CD1/95 standards, rather than traditional DMRB layouts, incorporating pedestrian and cycle crossings on all arms. **Note that, in fact, CD 1/95 is now part of DMRB and is therefore mandatory.***

#### **6.42.6 Rail alternative – uncertainties which may lead to increased road traffic**

The applicant proposes an increase in the frequency of freight train movements to facilitate bulk material imports by rail. We note the continued uncertainty regarding Network Rail. We are also fully aware that what may have the potential to reduce impacts on one community to a limited extent, would impose them upon others, especially the antisocial and weekend hours suggested. We see no contingency plans about what would happen if there were engineering works or faults on the main lines that would affect these deliveries. Would materials revert to HGV delivery?

We continue to be disappointed that insufficient confidence can be applied to these changes after nearly ten years of planning and consultations. EDF have had plenty of time to generate a plan with Network Rail that provides certainty as to what is possible and yet in Network Rail's Relevant Representation, they still cite lack of clarity on EDF's proposals as a reason for being unable to reach any sort of conclusion.

#### ***6.42.7 Beach landing facility (BLF) – uncertainties which may lead to increased road traffic***

The applicant proposes enhancement of the permanent Beach Landing Facility (BLF) and a new temporary BLF (jetty) to enable material imports by sea. There is a lack of detailed information about the potential impacts of the temporary BLF and the enhancements to the permanent BLF on coastal processes. The high-level conveyor across the beach would further damage the AONB landscape. As above, we see no contingency plans about what will happen if prolonged adverse weather conditions affect deliveries. Would materials then revert to HGV delivery?

The long-requested reduction in HGV traffic along with better utilization of rail and a request for delivery by sea have been made by a variety of consultees. We understand the reasons for the earlier rejection of the substantial jetty structure for environmental and coastal impact, given results from modelling and the impact on longshore drift that was experienced from jetty use for the Sizewell B development.

Any temporary Beach Landing Facility (BLF) needs to provide a significant and workable reduction in HGV traffic within the capacity of the construction site to stockpile delivered materials alongside whatever increase in capacity is achieved through increased rail deliveries. This must be achieved with little or no impact on coastal sediment transport either to the north or south of the site, in particular for Thorpeness and Aldeburgh where there are already significant coastal erosion issues. Any structures that result in sediment accretion at Sizewell in the predominantly north to south sediment transport regime is unacceptable.

**Conclusions.** See Section 6.113.4 for our reasons the DCO should be rejected because of Transport related issues.

---

## **6.5 Landscape**

**This part of the representation covers the following subjects**

**6.51 Community Implications**

**6.52 The Suffolk Coast & Heaths Area of Outstanding Natural Beauty**



- 6.53 The National Trust**
- 6.54 Suffolk County Council**
- 6.55 East Suffolk Council**
- 6.56 Government Protection of Landscapes**
- Conclusions**

## **6.51 Community Implications**

This section of our representation describes the significance of the local landscape in terms of its human and natural history; the importance of the nationally designated Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) and coastal habitats. It describes how the Government has agreed to support a recent extension to the AONB; it illustrates how the Government has recently, through its 2018 25 Year Environment Plan and 2019 Landscape Review proposed that this and similarly designated AONBs plus National Parks should be considered National Landscapes; it describes the response of the AONB Partnership to the Sizewell C proposal and the objections of the National Trust, Suffolk County Council and East Suffolk Council. It concludes with a list of Stop Sizewell C and Theberton & Eastbridge Parish Council objections to the proposed development because of damage to this landscape.

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the proposed development would result in enormous damage to this landscape. It would cut the AONB in two throughout construction and for the duration of the operating period of the power station and result in considerable permanent damage to the AONB and adjacent designated sites for the best part of a century.

## **6.52 The Suffolk Coast & Heaths Area of Outstanding Natural Beauty**

The Suffolk coast and its visitor economy is defined by the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). This forms a very distinctive area of legally protected countryside, towns and villages in a largely rural environment. The AONB was designated in 1970 with the purpose of conserving and enhancing the habitats and biodiversity of the special heathlands, woodlands, estuaries and coast. The AONB stretches from Kessingland in the north to the Shotley Peninsula in the south, and is characterised by shingle beaches, heathland, forest, estuaries and iconic coastal towns. It is cherished for its relatively undeveloped, tranquil landscape and stunning natural and cultural history.

### *Government support for the AONB*

The Government has confirmed the AONB is to be increased in size in the south. That the new area will benefit from AONB guidance and advice, as well as the funding made available to designated landscapes so they can deliver their statutory purpose. The AONB is a national designation, not a local designation. The National Planning Policy Framework (NPPF) also affords them further protection.

According to the government, the expansion will bring “significant” benefits to the local area, with local businesses able to promote the area as an AONB and access grants, including for sustainable tourism.

In September 2019, the Government’s *Landscape Review* concluded that the stature of National Parks and Areas of Outstanding Natural Beauty (AONBs) should be strengthened in the planning system – with AONBs given statutory consultee status. The review also recommended that, where appropriate, AONBs should be supported to work within local plans for their areas, prepared in conjunction with local authorities.

George Eustice, environment secretary, commented: “The Suffolk Coast & Heaths is a landscape rich in history and a source of inspiration to countless artists, writers and musicians, and these extensions are a worthy addition especially during this unprecedented time, when many of us are connecting with nature more than ever before. This milestone marks a significant step towards putting our ambitious 25 year environment plan to leave the environment in a better state than we found it into action.”

As the statutory agency for the natural environment, Natural England, carried out “thorough technical analysis and extensive consultation,” before submitting the proposed extensions to the government for consideration.

Councillor David Wood, chairman of the Suffolk Coast & Heaths AONB Partnership, welcomed the expansion. “The AONB partnership, made up of public, private and third sector organisations, has had an aspiration to bring the benefits of the designation to a wider area for over 20 years.

“Locally we have always known that the area identified in the Order was outstanding, and with this news we can be confident that the natural beauty of the area will be conserved and enhanced for future generations.”

#### *Impact of the proposed development on the AONB*

The main development site would be mostly located in the AONB. The AONB Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. The Partnership includes the local authorities and Government agencies and In its various responses to consultation over 9 years and in its relevant representation, it has rejected and pointed out so many areas of unacceptable consideration and assessment that it fears the development could affect the status of the Suffolk Coast & Heaths AONB designation.

For example, disregard for the purpose of the AONB, introduction of new pylons, damage to tourism, loss of SSSI land, worker and outage car park facilities within the

AONB, inappropriate access road and SSSI crossing to the site and many others diminishing the AONB designation.

[Sept 2020 This representation is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty \(AONB\) Part](#)

Stop Sizewell C and Theberton & Eastbridge Parish Council are in full agreement with the views of the AONB Partnership and fully support the representations that it has made in the development process to date and at the current DCO stage.

### **6.53 The National Trust**

Stop Sizewell C and Theberton & Eastbridge Parish Council agree with the National Trust in its assessment of the impact of the proposed development on the landscape, the damage to ‘*the integrity and beauty of our site at Dunwich Heath and the wider landscape*’. It is Stop Sizewell C and Theberton & Eastbridge Parish Council’s view that this would also result in long term damage to the local visitor economy.

The following paragraphs are extracts from the Trust’s Relevant Representations dated September 2020 at

<https://nt.global.ssl.fastly.net/dunwich-heath-and-beach/documents/sizewell-c-relevant-representation-280920.pdf>

*“The Trust owns 140 hectares of land at Dunwich Heath and Beach, which is located approximately 3 kilometres north of the proposed Sizewell C site. Dunwich Heath is a surviving fragment of lowland heath – one of the UK’s rarest habitats. It is subject to international and national designations. The majority of the land was declared inalienable in 1967 demonstrating the importance of the land and the Trust’s commitment to care for it permanently for the nation.”*

*“[The Trust] believe[s] that the current proposal risks unacceptably damaging the integrity and beauty of our site at Dunwich Heath and the wider landscape.”*

### **6.54 Suffolk County Council**

Suffolk County Council also has substantial concerns about the landscape impact of the proposed development, most recently summarised in its Relevant Representations submitted to the ExA, at ([Relevant Representation of Suffolk County Council in respect of the proposals for the Sizewell C Nuclear Power Station under sec](#)) Stop Sizewell C and Theberton & Eastbridge Parish Council fully support the concerns and expectations of Suffolk County Council.

*“Landscape and Visual Effects:*

*“80. Due to its prominent location in the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB), the design of the power station and its impacts on the character and special qualities of the AONB have to be considered as of very high importance to the development. This has been identified in EN6 and its supporting documents...”*

*“81. Significant adverse effects on visual amenity have been identified for several views from important local receptors. However, the applicant states that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during operation on these designations are therefore assessed as not significant. The Council disagrees with this conclusion...”*

*“82. The Council considers the applicant’s proposals for mitigating and offsetting these landscape impacts both within and beyond the Nationally Designated Landscape as inadequate, given that the purposes of the AONB designation...”*

## **6.55 East Suffolk Council**

East Suffolk Council also has substantial concerns about the landscape impact of the proposed development, most recently summarised as a list of viewpoints of the construction site and operational platform in its Relevant Representations submitted to the ExA, at [East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R](#)

*“It is claimed that these landscape and visual effects would only occur over localised sections of the AONB and Heritage Coast and so the effects during operation on these designations are therefore assessed as not significant. Again, this seems to be a highly dubious and unsatisfactory conclusion.....The far more likely conclusion is that the impact on the coastal aspects of the designations are of notable significance.”*

## **6.56 Government Protection of Landscapes**

The UK Government 25 Year Environment Plan 2018 ([A Green Future: Our 25 Year Plan to Improve the Environment](#)) and the UK Government Landscapes Review 2019 ([DEFRA - Landscapes Review - Final Report 2019](#)) have recognised the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment has to play in the objectives of these initiatives.

### **UK Government 25 Year Environment Plan 2018**

The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

#### **25 Year Environment Plan goals**

1. *Clean air.*
2. *Clean and plentiful water.*
3. *Thriving plants and wildlife.*
4. *A reduced risk of harm from environmental hazards such as flooding and drought.*
5. *Using resources from nature more sustainably and efficiently.*
6. ***Enhanced beauty, heritage and engagement with the natural environment.***

## UK Government Landscapes Review 2019

In 2019 the UK Government published its Landscapes Review, commissioned in response to the 2018 25 year Environment Plan. The central proposal is to bring National Parks and AONBs together as 'national landscapes', a shared service. The Review proposes:

- *Stronger purposes in law for our national landscapes*
- *AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes*
- *A new National Landscapes Service bringing our 44 national landscapes together to achieve more than the sum of their parts*
- *Reformed governance to inspire and secure ambition in our national landscapes and better reflect society*
- *A new financial model – more money, more secure, more enterprising.*

**Conclusions:** See 6.113.5 for Stop Sizewell C and Theberton & Eastbridge Parish Council's reasons that the DCO should be rejected because of impacts in this area.

---

## 6.6 Built Heritage

**This part of the representation covers the following subjects:**

### 6.61 Community Implications

### 6.62 East Suffolk Council Relevant Representation

### 6.63 Heritage Assessment

### Conclusions

#### 6.61 Community Implications

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the proposed development would have significant and adverse impacts on the historic environment and setting of heritage assets. We object to the level of harm to the historic landscape character and setting of heritage assets resulting from the main development, together with the associated works which fall outside of the AONB including, but not limited to, the accommodation campus, the Green Route railway line, the SLR and Yoxford junction alterations.

It is considered that the impacts on the setting of many heritage assets that have been identified in the Environmental Statement underestimates the level of harm that will occur. And the adverse impacts to the setting of heritage assets located along the wider access routes during the construction phase have not been adequately assessed.

The proposed access routes will change the rural setting of many heritage assets. This would arise from the construction of urbanising and highly engineered features such as the bunding at Leiston Abbey measuring between 1.8m and 2.4m in height,

topped by security fencing. There would be associated noise and traffic movement, the erosion or loss of historic field patterns and the characteristics of a farmed landscape. In particular the settings of Leiston Abbey, the Church of St Peter, Theberton, Theberton Hall, Glemham Hall, Farnham Hall, St Mary's Parish Church, Farnham, Cockfield Hall and Moat Farm, Theberton would be harmed. It will not be possible to provide adequate compensation for the anticipated damage to the historic natural and built environment.

The applicant's Sustainability Appraisal states that the setting of 90 heritage assets will be affected, yet the compensation is limited to two sites, Leiston Abbey and Upper Abbey Farm.

The applicant has failed to assess the impact on all the Listed Buildings and related structures along the full route that their traffic, particularly the heavy traffic, will take. They discuss such harm in a number of references but do not adequately assess it. Their historic environment assessment only focuses on those assets that have inter visibility with the main Development Site.

Many heritage sites located alongside the routes identified for road based construction traffic will be adversely affected for the duration of construction. This will be particularly true of a number of rural villages and settlements containing a wealth of designated and non-designated heritage assets and settlements.

The applicant has ignored the whole issue, apart from the relatively few with direct intervisibility. They have ignored the impact of noise and visual intrusion, and the gradual growth and increase this will generate. It cannot simply be assumed that there is 'no harm' to heritage assets from construction traffic. This real and cumulative impact has not been assessed, and should have been.

A number of the heritage assets that this new traffic will pass are places of quiet contemplation, reverence and prayer, including for the war dead. These assets are particularly sensitive to noise and traffic intrusion. This has Equality Act implications which have not been assessed.

## **6.62 East Suffolk Council Relevant Representation**

[East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R\)](#)

East Suffolk Council has made representations with regard to the proximity of Leiston Abbey, the most significant heritage asset in the locality, to the construction site, as follows

### ***Heritage***

*"2.240 The Scheduled Monument at Leiston Abbey First Site and Historic Landscape Character are the only heritage assets scoped in for assessment of potential impacts from the*

*cumulative effects by Sizewell C Co. The combined impacts of views of the main development site, proposed rail extension development and construction noise will have a significant impact on Leiston Abbey. There is not considered to be any adverse impact by Sizewell C Co. on noise and visual effects arising from the construction of the rail extension route. We accept that the line is temporary so any disruption to views would be temporary but noise during construction could have an impact and we want to explore this further. Noise during operation of the rail extension is considered to be significant.”*

## **6.63 Heritage Assessment**

A Heritage Assessment by consultant Richard Hoggett Fellow of the Society of Antiquaries of London and a Member of the Chartered Institute for Archaeologists, submitted by David Grant and others, comes to the following conclusions regarding SZC Co’s assessment:

*“The comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W presented here reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from EDF Energy’s reckoning of the total number of affected Listed Buildings and their grades. This inclusion of these figures alters the picture somewhat, and suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined.*

*“The comparative assessment presented here has indicated that while the likely heritage impacts of Route Z and the northern version of Route W are superficially very similar, when the study area of Route Z is calculated appropriately, the southern variation of Route W has the least heritage impact, with the northern variation of Route W also having a marginally lesser heritage impact than Route Z.*

*“With a 375m buffer applied, the northern variation of Route W has no Listed Buildings within its corridor, and only nine Listed Buildings within the wider study area. These do not include any Grade I Listed Buildings, only 1 Grade II\* Listed Building and eight other Grade II Listed Buildings. The Leiston Abbey Scheduled Monument is not included in the reduced study area. Overall, these figures would suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.*

**Conclusions:** See 6.113.6 for Stop Sizewell C and Theberton & Eastbridge Parish Council’s reasons that the DCO should be rejected because of heritage impacts.

---

## **6.7 Environment**

(Health and wellbeing, air quality, Biodiversity and ecology, terrestrial and marine, Flood risk, ground water, surface water)

**This part of our representation covers the following subjects**

**6.71 Community Implications**

**6.72 Minsmere Levels Stakeholder Group**

**6.73 Suffolk County Council**

**6.74 East Suffolk Council**

## **6.75 Environment Agency**

## **6.76 Suffolk Wildlife Trust**

## **6.77 Royal Society for the Protection of Birds**

## **6.78 Response to Applicant's 5th Consultation (Post DCO submission)**

## **Conclusions**

### **6.71 Community Implications**

Stop Sizewell C and Theberton & Eastbridge Parish Council strongly object to the Sizewell C DCO on environmental grounds; relating to environmental pollution (air quality, light, noise, dust and particulates) flood risk, water supply, terrestrial ecology, marine ecology, water framework directive and alignment of submission of Environmental Permits and the DCO.

Stop Sizewell C and Theberton & Eastbridge Parish Council are aware that many other organisations share these concerns and is, therefore supportive of the DCO representations offered to ExA by its partner organisation, the Minsmere Levels Stakeholder Group, together with the Environment Agency, Natural England, Suffolk Coastal Friends of the Earth, RSPB, Suffolk Wildlife Trust, and the two Councils.

Stop Sizewell C and Theberton & Eastbridge Parish Council objections to the DCO are covered in the following text prepared by its partner organisation, the Minsmere Levels Stakeholder Group

### **6.72 Minsmere Levels Stakeholder Group (MLSG)**

The MLSG comprises people that live and/or work in the area whose property, livelihood or quality of life can be affected by changes in the way the marshes are drained, or by the impact of coastal erosion. The Group works in partnership with Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group.

The Minsmere Levels are marshes starting south east of Reckford Bridge and finishing at the Minsmere Sluice. They drain the area of land either side of the Minsmere River starting at Sibton Lake. Sizewell Marsh drains through the southern Minsmere Levels to Minsmere Sluice and has a significant hydrological influence on the southern levels as a result.

MLSG (and Stop Sizewell C and Theberton & Eastbridge Parish Council) are concerned that the Sizewell C Development Consent Order remains significantly incomplete and fails to provide answers to questions raised consistently during four rounds of consultation. These concerns remain as follows:

- Assessment of coastal geomorphological impacts over time, the role of the Sizewell-Dunwich Bank and coastal breach .



- The development platform is well below the expected 30 hectares per nuclear reactor envisaged in EN-6 and has required unacceptable compromises on long term site safety.
- The development platform requires a Hard Coastal Defence Feature (HCDF) to be very close to the beach and subject to early exposure by wave action .
- There is no proposed design for the HCDF, yet the applicant has unevidenced confidence about its likely exposure.
- The applicant does not evidence an understanding of the relationship between ground and surface water and its quality for sustaining the unique habitats and ecology that is characteristic of Sizewell Marsh and Minsmere SSSIs despite being a 2014 Scoping Report Opinion requirement.
- The development platform requires redirection of the existing drainage in Sizewell Marsh, permanent loss of SSSI marsh, wet woodland, and fen meadow with un-evidenced expectations for simplistic water level controls as mitigation.
- Dewatering of the development platform and changes to surface water runoff conditions will alter the natural hydrological relationship of the complex Sizewell Marsh and Minsmere Levels systems and is likely to impact water quality and have a negative impact on Minsmere Sluice.
- Hydrological impacts of the proposed Causeway and Culvert crossing are not properly assessed.
- The overall ecology of both Sizewell Marsh and Minsmere Levels are reliant on the annual cycle of ground and surface water changes; any disturbance will have direct impacts on bird, insect, reptile and mammal species.
- Some habitat assessments are out of date and, as a result, impacts are likely to be missed or wrongly interpreted.
- No clear plan exists to satisfy the water requirements of the development and impact assessments of water resource options are missing.
- Proposed borrow pits and spoil heaps have great potential for introducing fugitive dust problems and pollution to groundwater and surface water runoff.

- Using the proposed borrow pits as a destination for disposal of unusable materials from excavations, including acidic peat, pose a long-term threat for pollution of groundwater and localized settling over time.
- Significant environmental impact assessments dismissed with undefined monitoring and mitigation.
- Reports relied upon by the applicant in the development of the project are not available for assessment.

The following paragraphs illustrate the many and varied environmental concerns of several other key organisations (Suffolk County Council, East Suffolk Council, Environment Agency, Suffolk Wildlife Trust and RSPB) that they believe have not been addressed adequately by the applicant. The paragraphs are the latest available and reflect their September 2020 Relevant Representation submissions to ExA and also the Planning Inspectorate’s Section 88 Initial Assessment of Principal Issues.

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that, should the development be approved, these environmental issues would have a dramatic impact on the natural history of the area, the quality of life of local communities and an adverse impact on the local visitor economy. Stop Sizewell C and Theberton & Eastbridge Parish Council are, therefore, fully supportive of the representations submitted by these organisations.

We have shown a number of extracts from these organisations’ Relevant Representations below.

### **6.73 Suffolk County Council**

#### [Relevant Representation of Suffolk County Council in respect of the proposals for the Sizewell C Nuclear Power Station](#)

*“126. Water Supply: The applicant proposes several high-level options to access the large amounts of potable and non-potable water it requires, yet it is clear that the majority of these options require medium to large scale interventions. Some of these may have significant environmental impacts, particularly in construction but also in operation, which have not been assessed within the submitted environmental statement. Equally, if the water supply measures by the applicant prove insufficient, there is the potential for risk to private water supplies in the area which will need to be properly assessed.....The Examining Authority will need to look closely at the options proposed and their wider environmental impact....*

*“127. Noise: The applicant has identified a range of adverse and significant adverse noise that will affect a wide range of sensitive receptors both around the development and across the wider district. It is still to be determined by the Council whether the assessments have not underestimated the impacts on those receptors that have been identified by the applicant as having low or negligible impacts.....A flexible and comprehensive scheme of ongoing assessment, monitoring and mitigation is likely to be key to minimising the noise impact of a development of this nature.....*

*“128. Air quality and dust:*

*“129. The Council is concerned about non-traffic air quality impacts particularly related to dust and wind erosion from strong coastal winds arising from stockpiles and concrete batching. Due to the height of the proposed stockpiles, wind erosion is likely to be an issue. Further work is required by the applicant to verify its assumptions about stockpile erosion, to assess the impact on ecological receptors as well as impacts on the occupants of the Accommodation Campus and to review and enhance necessary mitigation and monitoring arrangements.*

*“130. The proposed lime spreading may result in lime / dust translocation posing a risk activity for nearby ecological receptors; further site-specific mitigation based on measurement of local weather conditions is required.*

*“133. Lighting: Concerns remain about the potentially significant impact of lighting particularly during construction, with regards to nuisance, ecology, tranquillity and dark skies.....*

## **6.74 East Suffolk Council**

### **(Extracts relating to noise, lighting and air quality)**

[East Suffolk Council's Relevant Representation 20026200 Sept 2020 1 | Page East Suffolk Council's Relevant Representation R](#)

*“Noise conclusion in summary*

*“1.41 There are a number of significant adverse impacts from noise predicted to noise sensitive receptors from various elements of the proposals along with a level of uncertainty in the assessment that will need to be considered further before we can have confidence that noise has been adequately addressed.*

*“1.43 It is likely the DCO will contain a requirement that “exempts” the developer from action under Section 79 of the Environmental Protection Act 1990 (Statutory Nuisance)...However, due to the nature, size and duration of this development it is likely to cause complaint and there is an expectation that there will be cooperation with the Environmental Protection Team at East Suffolk Council in finding a resolution where these inevitable complaints are received and found to have merit.....*

*“1.45 ....it is likely that a project of this scale and magnitude will have noise impacts that will not be able to be reasonably addressed and those impacts will be present at varying degrees over the life of the project and this will need to be considered in the Council’s position.*

*“Lighting*

*“1.51 Lighting is an area that has the potential to significantly impact with regards to nuisance, ecology, tranquillity, and dark skies.....*

*“1.52 In terms of construction lighting there will need to be a commitment for cooperation with us to investigate complaints of light nuisance and where a complaint is substantiated to address the issue...*

*“Air Quality*

*“1.76 Construction phase impacts: Mitigation of dust during soil stripping - the mitigation measures within the draft CoCP and Dust Management Plan allow for monitoring associated with specific activities.....the CoCP should specify that dust deposition monitoring is required*

*when soil stripping is undertaken within close proximity of sensitive receptors. Mitigation measures in the CoCP should also take account of the scale of the proposed development, and its coastal location....the CoCP should include appropriate requirements regarding the emissions standards to be required on construction vehicles, and how these standards will be monitored and enforced.*

*“The Council requests that air quality monitoring is undertaken at agreed locations during the works in order to confirm the accuracy of modelled pollutant concentrations.....*

*“1.78 Experience at Hinkley Point C indicates that significant non-road mobile machinery (NRMM) is likely to be deployed during the construction programme.....adoption of low emitting plant....and an assessment of the impact of NRMM on both human health and ecology, both alone and in combination with other sources (e.g. road traffic)...further assessment should include a scenario with greatest number of NRMM working within close proximity of human health and ecological receptors, with appropriate and conservative assumptions about emission control standards....*

*“1.80 ....the Council requests that the highest standard of emissions control through design and maintenance should be used to ensure that no adverse impacts arise due to operation of the diesel generators.....*

*“1.86 It is unclear whether assessment of formaldehyde and carbon monoxide impacts from the generators during commissioning and shutdown periods is included in the ES. These pollutants should be assessed further in the air quality assessment.*

*“1.87 Further detail in relation to potential impacts arising from car parks on human health receptors; an assessment is required that includes the consideration of explicitly modelling emissions from engine starts and movement. In addition, impacts from stationary cars through ‘hot soak’ should also be considered in assessing local air quality concentrations of benzene.....*

## **6.75 Environment Agency - Outstanding issues of concern**

***(Extracts relating to flood risk, water supply, terrestrial ecology, Water Framework Directive, Environmental Permits)***

[Environment Agency Relevant Representation on Sizewell C Development Consent Order](#)

***“Flood Risk*** – *We have yet to agree that the supporting flood risk modelling is sufficient to consider the extent and consequences of flooding.....*

***“Water Supply*** - *The water supply options described do not provide evidence to demonstrate that a suitable and ecologically sustainable source of water can be provided to the Sizewell C Project.*

***“Terrestrial Ecology*** – *The proposed use of culverts will have significant impacts to watercourses, designated habitats and protected species.....*

***“Marine Ecology*** – *We have outstanding concerns over methods being used to assess impacts to marine ecology.....*

***“Water Framework Directive*** - *We have concerns that the assessments have not identified all the potential impacts under the Water Framework Directive (WFD) or adequately assessed*

*the potential for deterioration in the status of WFD waterbodies affected by the development.....*

*“Alignment between submission of Environmental Permits and DCO – At this time we must highlight that we are currently unable to advise the Examining Authority of our position on the environmental permits required for operation, or provide representations on any matters covered by those permits as the permit applications were not submitted sufficiently in advance of the DCO application.”*

**6.76 Suffolk Wildlife Trust (Extracts relating to European Protected Sites, coastal geomorphology, marsh harrier compensation areas, noise and visual disturbance, hydrological impacts on water quantity and water chemistry, specific hydrological impacts on Sizewell Marshes SSSI, loss of Sizewell Marshes SSSI, protected species, Biodiversity Net Gain)**  
[The Sizewell C Project Development Consent Order Application Planning Inspectorate Reference: EN010012 Relevant Representation f](#)

**“Introduction**

*“Suffolk Wildlife Trust (SWT) has engaged fully with the applicant throughout the pre-application phase.....The resulting mitigation and compensation will not offset the loss to biodiversity, or the impacts to protected sites and species. Despite lengthy discussions with EDF, many of the issues have not been resolved at the application stage.*

**“General Approach to European Protected Sites.**

*“It appears that assessments of impact on the Special Protection Area (SPA) and Special Area of Conservation (SAC) rely on the delivery of monitoring and mitigation plans that are not actually contained within the DCO application. Consequently, it is impossible to determine potential impact in many cases. Furthermore, assessment of the synergistic effects of different impacts is weak, effectively meaning that the conclusions regarding adverse effects on the integrity of the sites has not been fully determined.*

**“Coastal geomorphology**

*“There is a lack of detail on coastal defence design, making it impossible to fully determine what any medium to long-term impacts might be.....*

**“Marsh Harrier Compensation Areas**

*Whilst there has been some effort to provide compensation for the loss of marsh harrier foraging over Sizewell Marshes Site of Special Scientific Interest (SSSI) and the southern half of Minsmere Levels, we remain concerned that areas of foraging provided will be inadequate to offset overall loss.....*

**“Noise and visual disturbance**

*“We are concerned that the impact of noise and light spill on breeding, migrant and non-breeding birds within Minsmere Levels (part of Minsmere-Walberswick Heaths and Marshes SSSI) has not been fully captured...*

**“Hydrological impacts on water quantity and water chemistry**

*“We are concerned that the proposals for the cut off wall and Sizewell Drain alignment may significantly change the local water quantity and quality within Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SSSI. We believe there is potential for increased water flow from the development which may then create capacity issues at the Minsmere Sluice. This in turn could compromise water level management at RSPB Minsmere and its designated features and Sizewell Belts SSSI.....there is long-term risk from*

contaminated leachate emanating from the borrow pits, potentially entering the Minsmere-Walberswick designated sites.

**“Specific hydrological impacts on Sizewell Marshes SSSI**

“Sizewell Marshes SSSI comprises of nationally important fen plant communities that are reliant on a defined water chemistry range and high water quality. Efforts to maintain the water levels can only be achieved, when groundwater will be displaced, by replacing high quality groundwater with surface water of a very different chemistry and quality. This is very likely to have significant deleterious effect on the plant community..... Many of the rare species rely on high water quality and will therefore be extremely vulnerable to changes in water level and quality.....we believe there remains a significant amount of uncertainty that the proposed mitigation will not be enough to prevent long-term damage to the SSSI.

**“Loss of Sizewell Marshes SSSI**

“We are concerned that the loss of SSSI via the causeway/culvert option instead of the bridge option, which will lead to a much larger loss, has not been adequately and clearly justified. ....we believe it is likely many of the activities that will take place.....will result in the permanent damage to nationally important fen habitat....the proposed habitat compensation sites will not be able to offset the loss of biodiversity, with the outcomes likely to be deficient in quality and quantity.

“Aldhurst Farm habitat creation.....is likely to only support more generalist species, with a resulting overall loss of biodiversity.

**“Protected species**

“- Bats We have considerable concern that the overall impact on the nationally important bat population within the main development site has not been fully recognised.

“- Natterjack toad We are concerned there may be significant impacts on natterjack toads as a result of loss of hibernation sites due to the current proposed footprint of the Water Management Zone.

**“Biodiversity Net Gain (BNG)**

“We dispute the conclusions of BNG. It is crucial that mitigation measures are secured separately and not counted as contributing towards BNG.....

**6.77 Royal Society for the Protection of Birds (Extracts relating to coastal processes, hydrology, Noise and visual disturbance, Increased recreational pressure, Land take from Sizewell Marshes SSSI, marine ecology, protected species, socio economic concerns) [The Sizewell C Project Development Consent Order Application Planning Inspectorate Reference: EN010012 Relevant Representation f](#)**

“1 . The RSPB manages 220 nature reserves in the UK covering an area of over 158,725 hectares. The Society attaches great importance to the conservation of the 'Natura 2000' network (made up of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)), and the national network of Sites of Special Scientific Interest (SSSIs) notified by Natural England.

“2 The RSPB raised concerns about several potential environmental impacts where critical underpinning evidence was missing or inadequate, resulting in the Applicant’s assessments not being robust.....it is not possible to properly assess the Application and all its potential impacts on protected sites and species and biodiversity in the surrounding area.....

## **“2. Environmental Concerns**

### **“2a. Coastal processes**

- *Lack of detailed designs for coastal defences and other coastal structures mean we cannot have confidence in the findings of the assessments of their impacts;*
- *Insufficient evidence has been presented that the beach landing facility will not have significant impacts on coastal processes.....during its construction or operation;*
- *Insufficient evidence that impacts relating to the combined drainage outfall and fish recovery and return outfall can be managed without impacts on longshore bars and wider coastal processes;*
- *Concern about the potential effects of the hard coastal defence in the long term, including changes to coastal processes .....*
- *The need to develop a suitable monitoring scheme to identify coastal impacts at an early stage, with agreed thresholds for...implementation of avoidance or remedial measures.*

### **“2b. Hydrology (including impacts on water quantity and water chemistry)**

- *Insufficient evidence that the sheet piling/cut off wall and the realignment of Sizewell Drain will not have significant impacts on water quantity and water chemistry.....*
- *Lack of confidence that effects on groundwater and surface water will not have effects on the ecology of Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SSSI;*
- *.....contaminated leachate from borrow pits to affect the MinsmereWalberswick designated sites;*
- *Concern that increased water flow from the development to the Minsmere Sluice could affect water management.....*
- *Limited consideration of the effects of Sizewell C on flood risk.....*
- *Concern over ability of proposed monitoring to detect changes in water chemistry....*

### **“2c. Noise and visual disturbance**

- *Adequacy of proposed marsh harrier compensatory foraging habitat ...*
- *The basis for the calculation of the extent of compensatory marsh harrier foraging habitat to be provided;*
- *Significance of noise impacts on breeding and non-breeding waterbirds on the Minsmere South Levels...*
- *Lack of detailed assessment of the impacts of night-time noise from construction area and effects on designated sites....*
- *Lack of noise modelling for the construction of the north-eastern water management zone;*
- *Concern around the assertions that noise impacts are over-estimated;*
- *....potential impacts of lighting on birds.*

### **“2d. Increased recreational pressure**

- *The adequacy of the baseline data collected;*
- *The estimates of potential increases in recreational use of designated sites by both displaced visitors and construction workers appear low;*
- *Potential displacement of beach and coast path users from Sizewell to Minsmere frontage with potential impacts on SAC vegetated shingle/stony banks and beach nesting birds;*
- *Potential increase in use of the path from the Eel's Foot public house to Minsmere Sluice – waterlogging of this route and subsequent displacement of visitors could lead to effects on breeding and wintering waterbirds of the Minsmere-Walberswick SPA (or functionally linked to this site);*
- *Potential increased use of non-core, heathland areas at RSPB Minsmere leading to impacts on wildlife....*



- *Lack of any details of the proposed mitigation and monitoring plan leading to a lack of confidence in conclusions.*

**“2e. Land take from Sizewell Marshes SSSI (including impacts of the SSSI crossing)**

- *The principle of the proposed loss of part of Sizewell Marshes SSSI and its assessment against the tests set out in EN-1 (Overarching NPS for Energy) including the justification for the choice of an embankment and culvert rather than a bridge to cross Sizewell Marshes SSSI (despite the higher land take from the SSSI);*
- *The total area of loss from Sizewell Marshes SSSI and the designation of some loss as “temporary”, which has not been supported by proposals for adequate restoration methods; and*
- *Concern about adequacy of the proposed habitat compensation in terms of quantity and quality of all affected habitats.*

**“2f. Marine ecology**

- *The potential impacts on birds of the Outer Thames Estuary SPA and the Minsmere-Walberswick SPA....*
- *The combined total effects of the above impacts on marine birds have not been assessed;*
- *Concerns around the baseline data, reference populations and methodologies underpinning these assessments.*

**“2g. Protected species**

- *Potential impacts on bats...*
- *Potential impacts on natterjack toads...*
- *No alternatives to north eastern Water Management Zone have been considered...*
- *Concern around the impact of the SSSI crossing and culvert on ecological connectivity for protected species .....*

**“2h. Other issues**

- *The landscape strategy lacks sufficient details of baseline information, ecological objectives for habitats, species and ecological connectivity, habitat creation and management, robust monitoring and further interventions to be implemented if required and legal means of securing this throughout the lifetime of the development; and*
- *We do not agree with the Applicant’s conclusions around likely net gain arising from the development due to the replacement of higher value habitats with those of lower value, the time for habitats to reach target condition, the biodiversity value of existing habitats, the requirement to first demonstrate mitigation measures are adequate before counting additional benefits as net gain, and the loss of a significant proportion of Sizewell Marshes SSSI.*

**“3. Socio-economic concerns**

*The RSPB considers that there may be an impact on the number of visitors visiting the locality and RSPB Minsmere.*

•

## **6.78 Response to Applicant’s 5th Consultation (Post DCO submission)**

Stop Sizewell C and Theberton & Eastbridge Parish Council opinions expressed in four previous consultations and as expressed in our [Relevant Representation](#) remain unchanged. Our opposition to the project is likewise unchanged by these new proposals for the following reasons:



- There is no guarantee that the proposals consulted on can be delivered. We consider it inappropriate to seek approval for options that the applicant cannot express certainty about whether they are possible, and we further find it astonishing that, given the consistent expressions of concern, for example over traffic, for the last 8+ years, new ideas should only be forthcoming at this time.
- The new proposals, even if they prove to be deliverable, do not make the project acceptable. The proposed development remains the wrong project in the wrong place, on a fragile coastline, surrounded by rare designated and sensitive habitats and impossible to deliver without unacceptable impacts on local communities.

*Change to the sea defence and resilience to climate change.*

There is still no complete design so it is not possible for this to be properly assessed. We note that the height will increase and the defence likely to start 8m closer to the shore, beneath the current sacrificial dune and into the beach. However, there is very little sacrificial dune left here and this change will remove it completely. The initial design still does not go deep enough and with adaptation now scheduled to be until after the operational stage of SZC at the end of the century, there is still significant risk of exposure part way through the operational life according to SZC. Should the experimental soft coastal defence replenishment strategy fail or an exceptional tidal impact remove the soft defence the risk of defence collapse is real with mitigation difficult to implement.. There is still no indication whether the proposed adaptation goes deep enough to prevent defence collapse as there are inconsistencies between descriptions and the Figures provided in the existing documentation.

We remain unconvinced that Sizewell C's defences would not exacerbate erosion north and south or counter the potential for coastal breach north of the platform. WE are unhappy that the zone of influence has only been set at 3km centered on the SZC site. We observed the comments of Cefas' Tony Dolphin to the EADT in August, saying that the station could handle anything climate change throws at it, whilst simultaneously acknowledging that it was only possible to predict detailed changes to the coastline 10 years ahead, saying "almost every prediction in the very long-term has no certainty" (EADT 6 August 2020).

*Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss.*

All the applicant's proposed fen meadow compensatory habitats are some distance away so cannot offer any connectivity with affected habitats and the Pakenham proposal is even further away. It will not be created prior to construction and is in no way adequate compensation for the Fen Meadow and M22 habitat that will be lost.

We remain concerned that the environmental impacts associated with such a large construction site and the permanent access road and SSSI crossing between two significant Sites of Special Scientific Interest that will split the Suffolk Coast & Heaths Area of Outstanding Natural Beauty in two, for a century, are not justifiable.

Additional habitat compensation and mitigation sites are, in the main, disconnected from the existing Minsmere and Sizewell habitats and some will not be available and functional prior to the proposed commencement of the project. In the case of replacement Fen Meadow and M22 habitat, it is not clear that these can be created at these remote sites or that they will be sustainable in the long term and thus must be seen as inadequate to fulfil obligations under habitat regulations and planning law.

Aldhurst Farm is overly relied upon as compensation for losses in the Sizewell Marsh SSSI and the fact that it is inadequately connected to the SSSI, across Lovers Lane, further reduces its compensatory value.

#### *Environmental Mitigation*

We remain concerned that no evidence has been presented regarding the areas on EDF Energy Estate that have already been set aside to acid grassland of increased Marsh Harrier foraging. The reduction of three further potential sites to one at Westleton, has no supporting evidence that this will accomplish the mitigation task associated with the loss of foraging in the Sizewell Marsh area. The existing areas on EDF Energy Estate are very close to the sites for the borrow pits and spoil heaps. Any potential mitigation is therefore unlikely to be as successful during construction operations as now, when no construction works are in operation.

The move of the proposed reservoir into an area next to the borrow pits and water management zone releases the area next to Minsmere South Levels for flood defence and additional habitat creation. Reference is made to the area ultimately having potential for the creation of wet woodland. Given this is one of the habitat losses, it would make sense for this to be started as soon as practical once the land has been lowered and is suitable.

The reduction in the southern pylon height from 79m to 59m is noted. The fact that the original plan to have these cables in underground galleries cannot be achieved because of insufficient space on the constrained platform, reinforces the case for the pursuit of a reduction of this proposal to a single nuclear reactor where it might be possible for the adverse impacts and current deficiencies of this project to be resolved.

#### *SSSI Causeway Crossing*

The change of the current causeway/culvert structure with a 3.6m wide culvert to a "bridge" structure of 30m span and 70m overall east/west footprint does little to resolve the request for a proper bridge structure with minimal habitat damage. The

change in slopes to the east and west will result in the tunnel length beneath the structure reducing from 70m to approximately 55m. This will still result in the space below the “bridge” section becoming mainly barren of any vegetation and the embankments at either end remain with the same footprint as the original causeway/culvert.

The original options in earlier consultations for a bridge were for open structures supported by columns allowing light to penetrate beneath the structure and avoid any significant loss of vegetated area beneath the crossing. This “bridge” structure is really a causeway with a wide culvert and still suffers from perpetuating a significant loss of SSSI with a 55m long dark space that will still cause significant habitat fragmentation except for a few species that are capable of traversing such a dark and vegetation free corridor.

Moreover, with no details provided about the design and how the two embankments will affect groundwater flows between Sizewell Marsh and Minsmere South Levels, it is not clear what overall impacts this new structure will have on these interconnected areas and the fauna and flora that depend upon the hydrological stability of these habitats.

This new causeway with a wide culvert is a minor improvement but is still unacceptable as a method of crossing between Goose Hill and the Sizewell C platform.

There is still a potential for coastal breach to occur north of the Sizewell C site which will result in the breach travelling south and west along low land behind the sacrificial dune and reaching the SSSI crossing. No details are given about how the crossing would be protected should this occur and become a permanent incursion. Reliance upon potential future sediment accretion to protect the SSSI crossing and Minsmere South Levels is inappropriate. A proper columnar bridge structure would not require any such protection.

### *Coastal Defence Features*

At all previous consultations and in the DCO application plans for the seaward defence of the site have been sketchy, lacking in sufficient detail. As a result, there has been insufficient information to assess the claims of suitability, longevity and claims of little effect on coastal processes.

The later submissions to the DCO do nothing to address that shortcoming. Although there is a proposal to raise the initial height of the defence crest from 10.2m to 14m, the sketch of the new Hard Coastal Defence Feature (HCDF) has no dimensions other than the height and the fact that the HCDF toe will be set at AOD. There is no view from above to show where the HCDF will sit relative to the existing coastal strip, sacrificial dune front and beach.

There is a second sketch that shows the adapted HCDF one metre higher at 15m with the new defence overlaying the initial defence referenced above and with an HCDF toe that extends below AOD but with no indication of how far below AOD it reaches. Its height relative to Mean Low Water Springs is needed to give any confidence that this adaptation will be competent as an HCDF for such a strategic installation as a nuclear power station.

Based on the initial additional height of the HCDF (14m) it is likely that the toe will be some 8m further east of the point originally shown in a photograph during the Stage 3 consultation. This would take the toe of the HCDF into the beach in front of the site and would require the destruction of the existing sacrificial dune and disturb the structure of the existing beach with unknowable impacts.

There is little information about how any Soft Coastal Defence Feature will work in this new configuration and comments within the consultation seem to doubt its effectiveness and value.

With an HCDF toe much further forward than previously proposed, the effect on sediment transport across the Sizewell frontage and beyond will be exacerbated. The hard point that the HCDF and permanent BLF will present will also change how scouring across the whole of the Sizewell frontage behaves, potentially with significant effects for the Sizewell C frontage as well as potentially to the frontages for Sizewell sites A and B.

Sediment accretion to the north of the HCDF and BLF, referenced in the DCO, is likely to increase once these structures are exposed but it is not clear when this might happen or why it is assumed that this will have no effect outside of the "Greater Sizewell Bay", when the applicant made clear in a previous consultation that accretion at the Sizewell B jetty had effects further south at Thorpeness and Aldeburgh.

The original DCO suggested that the HCDF would likely be exposed in 2050. Following the HCDF increase in height in the revised plans now suggest adaptation will not be required until the end of power generation in 2094. However, if the HCDF has advanced 8m into the beach due to the raising of its height to 14m, HCDF exposure is likely to be even earlier than that, and because the initial HCDF toe is at AOD, it will be subject to daily tidal erosion beneath the rock armour. Adapting the HCDF when it is at AOD and subject to daily tides, is impractical. The inconsistent "sketch" and parameter plans, as have been provided so far, are not credible and are thus unacceptable.

## **Conclusions**

See 6.113.7 for our reasons why the DCO should be rejected due to environmental impacts.

---

## **6.8 Social impacts of the proposed development**

**This part of the representation covers the following subjects**

**6.81 Community Implications**

**6.82 Suffolk County Council**

**6.83 East Suffolk Council**

**Conclusions**

Evidence in this section is drawn from representations made by Suffolk County Council and East Suffolk District Council with which Stop Sizewell C and Theberton & Eastbridge Parish Council, the B1122 Group and the Parish Councils all agree. As a community we certainly share the concerns expressed and believe that the potential harm to the communities is of significant magnitude. Harms will be felt particularly in those communities near to operational and ancillary sites, including the park and rides, accommodation blocks and the settlements of Darsham, Eastbridge and Leiston.

### **6.81 Community Implications**

Whilst we recognise the applicant's conviction that the proposed development might 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 DCO documents. Stop Sizewell C and Theberton & Eastbridge Parish Council are concerned that the applicant has not yet conducted vital studies including Health and Community impacts. Noise pollution would be a real threat to health, causing heart disease, hypertension, hearing impairment, sleep disturbance, dementia. People living close to the site would be seriously affected.

It is difficult to imagine effective mitigation, and so the applicant must do much more to remove the causes of additional noise pollution in the first place, from traffic, its preferred siting of the proposed campus and borrow pits, and because of congestion and fly-parking.

Across the parish, and in the wider community, stress over the proposed development and its local impacts is already a significant factor in people's health and wellbeing. The impacts on the local environment 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? 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?

Overall Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the proposed development would leave a legacy of adverse social impacts on communities. Communities would be impacted by the influx of construction workers and there are likely to be effects on health on the receiving communities and on the incoming workforce; effects on accommodation; effects in relation to temporary on-site accommodation; effects on local businesses including tourism and the local supply chain and effects on the labour market. See also the Stop Sizewell C's Economic Statement Response and the evidence related to the proposed Accommodation Campus.

Stop Sizewell C and Theberton & Eastbridge Parish Council concerns are also expressed in the representations of Suffolk County Council, East Suffolk Council and the Suffolk Safeguarding Partnership. Stop Sizewell C and Theberton & Eastbridge Parish Council agree with these organisations with regard to many of the social aspects of the proposed development.

Stop Sizewell C and Theberton & Eastbridge Parish Council have used extracts from the Relevant Representations of the two Councils and agree with Suffolk Safeguarding Partnership Relevant Representation in full, referenced below. (See [Submission by the Suffolk Safeguarding Partnership about the Sizewell C application](#))

### **6.82 Suffolk County Council**

Stop Sizewell C and Theberton & Eastbridge Parish Council agree there is a likelihood of detrimental impacts on community safety and community cohesion, as a result of the significant number of non-home based, predominantly male and young, workers within a rural community characterised by small towns. Stop Sizewell C and Theberton & Eastbridge Parish Council also disagree that potential effects on community cohesion after proposed built-in mitigation measures are likely to be "minor adverse (not significant)". We are concerned that community safety impacts will occur, particularly related to sex services, sexual exploitation of young people and drugs, alcohol misuse, anti-social behaviour, domestic violence, sexual violence and the corresponding additional risks to safeguarding of vulnerable people as well as wider community cohesion and integration issues.

Stop Sizewell C and Theberton & Eastbridge Parish Council disagree with the applicant's assessment that there would be insignificant impacts on most areas of community and public services. There is a risk of impacts on service areas including social care, safeguarding, family services, housing for vulnerable adults and families, and other areas.

The proposed onsite health services would not mitigate health impacts on the wider community. Mitigation will need to include service contributions to the Council Public Health and appropriate levels of funding should be provided to the local Clinical Commissioning Groups, the Acute Trusts and the Ambulance Service, ensuring that the health provision for residents is not unduly affected as a result of the proposed development.

### **6.83 East Suffolk Council**

Stop Sizewell C and Theberton & Eastbridge Parish Council agree that there are multiple communities close to the Main Development Site and Associated Development sites across East Suffolk and sharing and using the same highway network during the construction phase, that would be impacted by a development of this scale. And also those using recreational and tourism facilities close to the development site. And that during construction, the impacts will be widespread across East Suffolk, Mid Suffolk and Ipswich. Stop Sizewell C and Theberton & Eastbridge Parish Council believe this to be unacceptable in principle.

Community Safety is a key issue across the construction of the project and the applicant's analysis of anticipated crime is an artificial assessment and unacceptable. They have not taken into consideration the significant impact of the increased workforce across the affected East Suffolk towns of Leiston, Southwold, Lowestoft, Saxmundham and Aldeburgh, all of which, apart from Lowestoft, are relatively small communities in terms of increased tension, traffic congestion and related community safety issues, anti-social behaviour effects of a predominantly young male workforce and the potential increase in local crime as a result, for example drug related offences, County Lines impact (in an area which currently has no live 'lines'), prostitution, physical assaults and abuse. Comparisons are made with Hinkley, but the demographic is different in East Suffolk and closer comparisons and learning should be gleaned from the Sizewell B construction and the actual effects of the significant NHB workforce based in East Suffolk. Sizewell C is also a much larger project and estimated to be in construction phase for 9 – 12 years, compared to Sizewell B which was an 8-year build project.

The applicant's assessment considers how measures have been designed to manage the Sizewell C Project's construction workers, their use of and access to public services, accommodation and community facilities, and how measures have been designed to promote integration, manage community safety and perceptions of safety to "reduce potential effects on community cohesion to minor adverse (not

significant)". Stop Sizewell C and Theberton & Eastbridge Parish Council agree that this would be extremely difficult to achieve, even with the help of the two Councils.

There is an assumption within the DCO that the numbers of partners and children accompanying Sizewell C workers will not impact significantly on the capacity of local services. Stop Sizewell C and Theberton & Eastbridge Parish Council agree with the District Council that this will impact on local health visiting, and early intervention services.

**Conclusions:** See 6.113.8 for our reasons why the DCO should be rejected due to social impacts.

---

## **6.9 Cumulative Impact**

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast would be dramatic, and without intervention from central government, would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. Cumulative impacts will arise from Sizewell C, Sizewell B, the Scottish Power Renewables proposals for onshore wind farm infrastructure and the European and UK interconnector projects described below, as well as the construction of permanent and temporary mitigations. The adverse impacts on Suffolk life from Sizewell C and these other projects would far outweigh the benefits. Adverse impacts would arise from:

- Construction activity for many years both on the main site and in the surrounding countryside
- Community impacts (noise, light, dust and particulates, health)
- Transport impacts including the failure to deliver mitigation prior to early construction phases and the construction of a link road that will leave no useful legacy.
- Landscape damage both on site and in the surrounding areas.
- Harm to the built and natural heritage
- Flood risk
- Damage to the visitor economy
- Housing impacts
- Public service impacts (health, education, policing)

The Nautilus Interconnector is a proposed 1.4GW interconnector between Belgium and the UK promoted by a subsidiary of National Grid Electricity Transmission plc (NGET). It has a proposed landfall between Sizewell and Thorpeness.

The Eurolink Interconnector is a 1.4GW interconnector to the Netherlands. In National Grid's Interconnector Register on 8 January 2018 the project was identified with a connection site at "Leiston 400kV Substation". In December 2018 it was



identified by NGET as having the same set of landfall and grid connection parameters at Nautilus.

Greater Gabbard Extension, now North Falls OFW. An agreement for lease has been signed with the Crown Estate. An application for development consent for this 504MW OFW is expected in 2023.

Galloper Extension. now Five Estuaries OFW. An agreement for lease has been signed with the Crown Estate. The proposal is for a 300MW OFW. It is understood that a Grid Connection Offer has been made in respect of the proposal, which is featured on National Grid's Transmission Entry Capacity (TEC) Register. The terms of that connection offer are not known.

---

## **6.10 Draft DCO**

The DCO Covering Letter considers Consent Flexibility. In this regard defined elements of the Sizewell C Project would use a 'parameters approach' which identifies envelopes within which development would be undertaken. The applicant says that this approach allows for sufficient flexibility to accommodate design development that is anticipated following the grant of a DCO.

In adopting a parameters approach, the applicant suggests that it has carefully considered the Overarching National Policy Statement for Energy (NPS EN-1), the National Policy Statement for Nuclear Power Generation (NPS EN-6) and the Planning Inspectorate Advice Note Nine: Rochdale Envelope (July 2018).

In its Relevant Representation East Suffolk Council says that:

*"There is an issue of uncertainty in the assessments which must be addressed. Sizewell C Co. have accepted this uncertainty in their reports and it is to be expected in a project of this size and addressed under the principle of the Rochdale Envelope. Uncertainty is an issue where it might cause the assessment of impact to be underestimated through being informed by too little information or too much assumption.*

*"The Rochdale Envelope assessment approach is an acknowledged way of assessing a Proposed Development comprising EIA where uncertainty exists, and necessary flexibility is sought. However, case law has established that the need for flexibility should not be abused and further justification will be sought to this effect.*

*"There will also be a reciprocal expectation and requirement for flexibility on the part of Sizewell C Co. in terms of further assessment and mitigation to take account of any underestimation in impact and the need to address it in the future."*

Stop Sizewell C and Theberton & Eastbridge Parish Council are extremely concerned that the proposed provisions of the Draft DCO, prepared by the applicant, need very careful scrutiny by the ExA, in particular because of its many effects on local communities most impacted by the form of the proposed development.

The multiple adverse effects of the proposal, the sensitivity of the location, and the inadequacy of the mitigation proposals are considered elsewhere. Should Development Consent be given they all point to the need to take a far more thorough approach to the design of all the infrastructure at this stage. The parameters need to be more tightly drawn. The flexibility to downsize the projects without further approval needs to be limited. The design of the entire project needs to be the subject of far better controls by the appropriate public sector bodies to ensure that the proposed designs are the least harmful achievable.

The Main Development Site parameter plans are far too flexible to secure a development that minimises impacts on communities and the environment, in particular the way that it covers, amongst other things the following elements:

- SSSI crossing
- Beach landing facility
- Soft coastal defence feature
- Hard coastal defence feature
- National Grid pylon and associated infrastructure
- Accommodation Campus

Should the development proceed Stop Sizewell C and Theberton & Eastbridge Parish Council agree with the Planning Inspectorate's Section 88 *Initial Assessment of Principal Issues* associated with the Draft DCO that need to give adequate consideration in order to protect communities, including:

- The Adequacy of the DCO Requirements, and associated provisions and documents, their status and enforceability to secure the proposed mitigation (primary, secondary and tertiary) and monitoring.
- Whether any additional Requirements are necessary.
- Whether the flexibility that the scheme currently provides in terms of detailed design can be justified and represents a reasonable approach.
- The proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents and appeals, including arbitration.
- The need for and means of securing funding for any necessary monitoring and enforcement of the dDCO Requirements.
- The explanatory memorandum.

## **6.11 Reasons why the DCO should be rejected**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO (as updated) should be rejected for the following national, regional and local reasons.

### **6.111 National Policy**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

The proposed Sizewell C site is not suitable because the site and proposed development will not address those impacts envisaged by Government in EN-6; in that it fails to avoid or mitigate

- actions of coastal erosion
- effects on biodiversity including the SSSI that is partially included in the site boundary
- the visual impact on the AONB.

Moreover the proposed development site:

- is at risk from climate change and sea level rise and fluvial flooding
- is too small to accommodate a development of this scale
- would have enormous transport and socio economic impacts which the developer has shown no evidence of being in a position to mitigate.

### **Suffolk Coast & Heaths AONB**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

- The proposed Sizewell C site is not suitable because the proposed development will not mitigate the visual impact on the AONB as envisaged by the Government in EN-6.
- The proposed development would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'.
- The proposed development does not reflect the Government's view expressed in its 2018 25 Year Environment Plan and 2019 Landscapes Review regarding the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment in the objectives of these initiatives.
- The proposed development would have a catastrophic long term impact on the landscape character of the Suffolk coast and also inland with the construction of the SLR
- The proposed development would have an adverse impact on the integrity of the Suffolk Coast & Heaths AONB and many nationally and internationally important nature conservation areas.

- The applicant's planned mitigations for landscape and ecological damage would be woefully inadequate and not compensate for the damage done during construction and beyond.
- The proposed development does not seek to address the issues of the cumulative impacts of proposed energy infrastructure (Sizewell C, Sizewell B development, onshore wind farm and interconnector infrastructure).
- Although located outside the AONB the campus would be within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty and statutory purposes of the AONB.

## **6.112 Regional Objections**

### **Cumulative Impact**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast would be dramatic; and would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. The adverse impacts to Suffolk life from Sizewell C and these other projects would far outweigh the benefits. The adverse impacts would be from:

- Construction activity for many years
- Community impacts (noise, light, dust and particulates, health)
- Transport (road transport using an inadequate road network in particular)
- Landscape damage
- Harm to the built and natural heritage
- Flood risk
- Damage to the visitor economy
- Housing impacts
- Public service impacts (health, education, policing)

## **6.113 Local Objections**

### **6.113.1 Residential Amenity**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

- Theberton and Eastbridge and the B1122 communities would experience considerable loss of the residential amenity that they currently enjoy because of noise, dust and particulates, light pollution and loss of dark skies, traffic movements, the proximity of the proposed residential campus and the proposed borrow pits and spoil heaps and from the construction site activity generally.

- The presence of thousands of construction workers for at least a decade and in what is presently a peaceful rural environment would be very damaging to that environment and local communities.
- It would not be possible for the applicant to have adequate regard to the protection of the existing residential and rural environment nor to provide adequate mitigation.

### **6.113.2 Accommodation Campus and Strategy**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

- The proposed Accommodation Campus would have very harmful and direct impacts on local communities during its construction and operation because of noise, light, pollution, traffic and social pressures.
- Alternative sites for the proposed Campus have been suggested but justifications for selecting the single Eastbridge Lane site are poorly evidenced.

### **6.113.3 Borrow Pits and Materials Management (Spoil Heaps)**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

Both proposals would have a significant adverse impact on local communities and they would not satisfy policies MP3 and GP4 of the Suffolk Minerals & Waste Local Plan 2020.

In terms of Policy GP4 the proposed borrow pits and spoil heap do not adequately assess or satisfactorily mitigate (and address where applicable any potentially significant adverse impacts including cumulative impacts) the following:

- pluvial, fluvial, and groundwater flood risk;
- vehicle movements, access and the wider highways network;
- landscape character, visual impact, setting, and designated landscapes including the Suffolk Coast & Heaths AONB;
- biodiversity including important hedgerows and trees;
- geodiversity;
- historic environment, archaeology, heritage assets and their setting;
- public rights of way;
- neighbouring land-use, in particular the nearby residential communities;
- soil resources including the best and most versatile agricultural land;
- noise and vibration;

- air quality including dust and odour, in particular impacting nearby residential communities;
- light pollution in particular impacting nearby residential communities, the 'dark skies' enjoyed by local communities and an important component of the visitor economy;
- the local water environment;
- land instability;
- the differential settlement of quarry backfilling;
- mud and aggregates on the road;
- litter, vermin and birds.

The proposals do not meet or exceed the appropriate planning policy or guidance. The proposals do not demonstrate that when considering the potential for significant adverse impacts upon features of acknowledged environmental importance (local communities), that the hierarchy of firstly avoidance, then mitigation and finally compensation has been followed.

#### **6.113.4 Transport**

Stop Sizewell C, Theberton and Eastbridge Parish Council and the B1122 Action Group conclude that the applicant has failed to consider the scale of combined and cumulative impacts from its approach to delivering the requirements of National Policy Statement EN-1 paragraph 5.13.6. This includes the failure to deliver mitigations prior to the early stages of site development at the Sizewell facility as well as traffic from the Scottish Power Renewables onshore development at Friston, other wind farm expansions and interconnector infrastructures; resulting in substantially increased traffic flows on the B1122 for three years (or longer if there are legal challenges to the relief road CPO).

Whilst the Local Plan may have very limited material influence over this national decision, it nonetheless includes important contextual policies that seek to deliver sustainable development whilst protecting the communities of East Suffolk from harms caused by major development. The proposed mitigations and their timing are, in principle, inconsistent with the Suffolk Coastal Local Plan.

We therefore conclude that the proposed mitigations as they stand are inconsistent with or fail the policy tests outlined at the beginning of this representation by reason of their timing, impacts and failure to deliver community benefits.

We object to the Sizewell C development, however if the DCO is granted, the agreements we require are as follows:

- *The applicant should be bound to deliver the package of mitigations including a link road, park and ride, online improvements to the A12, green rail route and confirmed rail paths prior to commencement of the early works at the main*

*Sizewell power station site and at the proposed Eastbridge Accommodation Campus.*

- *The link road should be constructed on a different and less impactful alignment from south of Saxmundham. It should be designed in such a way as to better assimilate into the landscape, avoid sensitive ecological and noise receptors, and it should deliver a legacy of long-term value to current and future residents of East Suffolk.*
- *The applicant should confirm and commit to the reduced HGV movements and assess the impacts of traffic increases at the most sensitive times with a view to mitigating these impacts, particularly along the B1122 and the A12 at Yoxford.*

The combined Stop Sizewell C, Theberton and Eastbridge Parish Council and B1122 Action Group position, as expressed in four previous consultations and as set out in Stop Sizewell C's [Relevant Representation](#), remains unchanged by recent amendments to the DCO including accompanying environmental statements and changes to mitigating measures. Our opposition to the project is unchanged due to unresolved uncertainties as follows:

- There is no guarantee that the proposals consulted on can be delivered. We consider it inappropriate to seek approval for options that the applicant cannot express certainty about whether they are possible, and we further find it astonishing that given the consistent expressions of concern, for example over traffic, for the last 8+ years, new ideas should only be forthcoming at this time.
- The new proposals, even if they prove to be deliverable, do not make the project acceptable. The proposed development remains the wrong project in the wrong place, on a fragile coastline, surrounded by rare designated and sensitive habitats and impossible to deliver without unacceptable impacts on local communities.

#### **6.113.5 Landscape**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

The applicant's approach to landscape and the protection of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty described in the DCO should be rejected for the following reasons:

- The proposed Sizewell C site is not suitable because the site and proposed development will not mitigate the visual impact on the AONB as envisaged by Government in EN-6.

- The proposed development would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'.
- The proposed development does not reflect the Government's view expressed in its 2018 25 Year Environment Plan and 2019 Landscapes Review regarding the essential nature of environmental quality and the significance of the enhanced beauty, heritage and engagement with the natural environment in the objectives of these initiatives.
- The proposed development would have a catastrophic long term impact on the landscape character of the Suffolk coast.
- The proposed development would have an adverse impact on the integrity of the Suffolk Coast & Heaths AONB and many nationally and internationally important nature conservation areas.
- The applicant's planned mitigations for landscape and ecological damage would be woefully inadequate and not compensate for the damage done during construction and beyond.
- The proposed development does not seek to address the issues of the cumulative impacts of proposed energy infrastructure (Sizewell C, Sizewell B development, onshore wind farm and interconnector infrastructure).

#### **6.113.6 Built Heritage**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

- The level of harm to the historic landscape character and setting of heritage assets resulting from the main development, together with the associated works which fall outside of the AONB including: the Accommodation Campus and the SLR.
- The Environmental Statement underestimates the level of harm that will occur; and the adverse impacts to the setting of heritage assets located along the wider access routes during the construction phase have not been adequately assessed.
- The proposed access routes will change the rural setting of many built heritage assets, introducing through the addition of urbanising and highly engineered features (such as the bunding at Leiston Abbey), with associated noise and traffic movement, resulting in the erosion or loss of historic field patterns and the characteristics of a farmed landscape. It will not be possible to provide adequate compensation for the anticipated damage to the historic natural and built environment.
- The comparative analyses of the SLR (Route Z) and the northern and southern iterations of Route W reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from the total number of affected Listed Buildings and their grades.



This suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined. Overall, these figures suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.

#### **6.113.7 Environment**

- Effectiveness of Flood Risk Assessments for the main development site and all other associated development sites in considering the effects of coastal, fluvial, surface water, groundwater, sewers and other sources of flooding, taking into account climate change.
- The effect of Sizewell C on coastal processes is unclear and its proposed rock armour defences are inadequate.
- The existing Minsmere Sluice was renewed in 2012 but its adequacy to cope with the changing environment, in particular during construction and operation of Sizewell C, has not been addressed by the DCO.
- The proposed construction and operation of the development would result in unacceptable levels of environmental pollution, including from light, noise, air quality, traffic and dust and particulates.
- Mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan and Code of Construction Practice need to be appropriately addressed.
- Mitigation of the environmental impact of the proposed borrow pits and subsequent landfill, and other areas of landfill has not been addressed adequately in the DCO.
- The proposed development has not addressed the potential adverse impacts on the ecological value of species and habitats in the marine and terrestrial environment.
- Implications for the integrity of designated sites, including: internationally designated sites, in particular European sites and European marine sites; nationally designated sites, such as SSSIs, the AONB and impact on local, regional and nationally significant natural history has not been adequately addressed.
- Appropriate Assessment, including Imperative Reasons of Overriding Public Importance, compensatory measures, selection of Natura 2000 sites, and alternatives for the Minsmere-Walberswick Special Protection Area (SPA) and Ramsar sites in respect of effects on breeding marsh harrier population during construction.
- Appropriate assessment in respect of coastal, freshwater and terrestrial habitats, ornithology, marine mammals and migratory fish.
- The proposed development does not fully address the need to provide an adequate drainage and water supply for the construction period and beyond.

- Abstraction of water will have its own impacts which will need to be managed to avoid risks to the environment and to protected species.
- A dewatering discharge strategy has not been provided. An unsustainable dewatering approach increases risks to the environment and potential harm to protected species.
- The risks to groundwater levels and surrounding habitats and ecology have not been adequately assessed and mitigated.
- Proposals increase flood risk due to the loss of flood storage from the main development site footprint and the proposed SLR.
- Inadequacy of the environmental measures incorporated into the design and mitigation proposals and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

### **6.113.8 Social Impacts**

Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the DCO should be rejected for the following reasons:

- The proposed development, because of the intensive construction activities for a period of at least 10-12 years and thereafter during operation, would result in significant and long term damage to the Suffolk coast visitor economy.
- The Suffolk Coast Destination Management Organisation has found that tourism could lose up to £40 million a year, with the potential loss of up to 400 jobs.
- The Coronavirus Covid 19 Pandemic has placed the visitor economy under severe pressure throughout 2020 and into 2021. Stop Sizewell C and Theberton & Eastbridge Parish Council believe that the proposed Sizewell C development would increase that pressure because of its environmental impact and the loss of tourism workers to the development workforce.
- The proposed development would place unacceptable pressure on local housing accommodation because of the need to house very large numbers of construction workers.
- The DCO does not provide adequate information to address local supply chain advantages and disadvantages.
- The DCO does not specifically address the essential funding of a Leiston economic development/regeneration programme.
- The DCO does not address the impact of the proposed development on the availability of tourism accommodation, particularly during the construction period.
- The DCO does not adequately address the impact on local jobs and skills, during construction and operation.
- The DCO does not address the issue of locally based employment. The sectoral work is inadequate and does not help to explain what jobs, at what

skills/remuneration levels, and how long these jobs will be available to local people.

- The likely socio economic aspects of development are not adequately addressed by the applicant.
- Details of the proposed housing and tourism funds remain inadequate.
- Minimal consideration has been given to potential negative impacts on local businesses outside the nuclear supply chain whether through competition or disruption to investment.
- There is no account taken of the long term negative impact on the environment and therefore the future natural capital and tourism value of the site, i.e. no long term view emerging of the economic legacy of a comparable project other than jobs created in the nuclear sector.
- The applicant fails to explain how vulnerable children and adults in the local area would be affected by Sizewell C, in the short, medium and long term.
- The applicant has not taken into consideration the impact of the development on the rights of children in relation to health and mental wellbeing, access to safe open spaces and increased travel times to schools, colleges and recreational facilities.

### **Draft Development Consent Order**

Should Development Consent be given there is a need to take a far more thorough approach to the design of all the infrastructure at this stage. The parameters need to be more tightly drawn. The flexibility to downsize or upscale the projects without further approval needs to be limited. The design of the entire project needs to be the subject of far better controls by the appropriate public sector bodies to ensure that the proposed designs are the least harmful achievable.

The Main Development Site parameter plans are far too flexible to secure a development that minimises impacts on communities and the environment, in particular the way that it covers, amongst other things, the

- SSSI crossing
  - Beach landing facility
  - Soft coastal defence feature
  - Hard coastal defence feature
  - National Grid pylon and associated infrastructure
  - Accommodation Campus
-

## **7. Recommended community safeguards should Development Consent be granted**

7.1 Should the DCO be consented there will be a need for legally-binding commitments made by EDF and others during and after the DCO process (e.g. Planning Performance Agreement, Section 106 Agreement, Highways legal agreements and Planning conditions) with an associated requirement for ongoing monitoring and enforcement. **This view does not in any way constitute an acceptance of the applicant's plans.**

### **7.2 In terms of the development directly impacting Eastbridge and its adjacent areas these should include:**

- appropriate mitigations of the impact of the proposed development on the hydrology of the Sizewell Marsh, Minsmere Levels and Minsmere River valley
- monitoring and contingency arrangements related to the impact of the development on natural coastal processes
- monitoring and contingency arrangements related to the pollution associated with the use of back-fill materials deposited in the proposed borrow pits
- borrow pit restoration to the land use specified in the Development Consent
- mitigation of any adverse impact of the development on the future effective operation of the Minsmere sluice and to maintain the water course so that it responds to flood risks (e.g. dredging of the river from Middleton and appropriate adaptations to the management of outflow at the Minsmere Sluice)
- survey and protection of existing landscape features, including ponds, hedges and trees (including veteran trees) for the entire development site and for the duration of the development
- the establishment of appropriate pollution monitoring and contingency arrangements for the entire development site for the duration of the development (e.g as a result of noise, light, dust, particulates, surface and ground water and leachate)
- waste water treated to appropriate regulations before discharge.
- appropriate management of the establishment and the operation of borrow pits and spoil heaps

### **7.3 for and associated with the Accommodation Campus (Campus) site;**

- the proposed Campus site must not extend west of Eastbridge Lane and the ExA should ensure by legal agreement that no flexibility exists to increase the size and scale of the Campus
- no part of the Campus shall exceed four storeys in height
- that the site is fully restored to improved pasture as illustrated in the Stage 3 Pre-Application Consultation so it cannot be developed in the longer term
- all Campus lighting is designed to avoid light spillage in the direction of neighbouring residential development, including Eastbridge

- the proposed decked car park on the north side of the Campus to be designed to exclude light spillage from motor vehicles towards Eastbridge and other nearby residential properties
- noise from the Campus during occupation is limited so that no disturbance occurs to nearby communities and households, including Eastbridge
- that all existing trees and hedgerows are adequately protected from damage during construction of the Campus and thereafter
- that the Campus is landscaped adequately to minimise the risk of visual intrusion of buildings when viewed from Eastbridge and nearby residential property
- that the applicant and the management organisation responsible for the proposed Campus make appropriate limitations on the ability of residents to exit the site on foot, cycle or by motor vehicle other than by the proposed main site entrance at the B1122
- that the proposed Campus is served by appropriate and adequate waste management, sewerage management, water supply and water management facilities, energy supply and broadband facilities and that these services that have zero adverse impact on local communities and households
- that during construction of the Campus appropriate measures are taken to minimise the impact of noise, dust and particulates, vehicle emissions and light pollution on nearby residential development, including Eastbridge
- that construction activity be limited to the hours of 7am to 6pm
- that neighbouring highways be cleaned of debris arising from the Campus construction site daily
- that construction vehicles leaving the Campus construction site should be washed on site before joining the highway
- that the lighting of fires to dispose of Campus construction site building debris shall not be permitted
- that Campus site construction workers and contractors shall not be permitted to travel to the site via Eastbridge nor to park outside the Campus site boundary, including in Eastbridge and Theberton and surrounding rural roads, on the B1122 or the road connecting the B1122 and Eastbridge)
- that in the event of road incidents during construction and operation of the proposed Campus construction workers, contractors and residents should not be permitted to travel to the Campus construction site via Eastbridge and Theberton (other than on designated routes) and associated minor roads
- that Campus residents shall not be permitted to travel to the Campus through Eastbridge nor to park outside the Campus site boundary, including in Eastbridge and Theberton and surrounding rural roads, on the B1122 or the road connecting the B1122 and Eastbridge.)

#### **7.4 Sizewell Link Road (SLR)**

- Together with other components of the transport mitigation package, the SLR shall be constructed and opened prior to commencement of the early works at the Sizewell site.
- that the SLR as proposed shall be removed by the applicant following the period of construction of Sizewell C. Arrangements for funding of this work to be established by way of an appropriate legal agreement and/or endowment before commencement of the development.
- that land taken by the proposed SLR shall be restored to its original condition and use and to a standard agreed by local communities and landowners as well as the Local Planning Authority.
- the design of the proposed SLR should reflect recognised highway standards related to safety, and it must include separate infrastructure for use by bicycles, pedestrians, people with mobility difficulties and equestrians constructed to the standards set out in Local Transport Note 1/20 as a minimum.
- the applicant shall fully fund the maintenance of the proposed SLR for the period of its use.
- the applicant shall give due consideration to the impacts of community severance as a result of the construction of the proposed SLR and design the road accordingly e.g. SLR to bridge over or under minor roads (e.g. Pretty Road) to maintain local permeability and accessibility.

## **7.5 Planning Act 2008 – Section 88 Initial Assessment of Principal Issues**

The following list of recommended community safeguards is mostly based on the Initial Assessment of the Principal Issues prepared under section 88(1) of the Planning Act 2008 (PA2008). The ExA says that it *will have regard to all important and relevant matters during the Examination and when it writes its Recommendation Report to the Secretary of State for Business, Energy & Industrial Strategy after the Examination has concluded*. Stop Sizewell C and Theberton & Eastbridge Parish Council believes that these matters cover many of the issues that need to be addressed as planning conditions and legal agreements between appropriate parties should Development Consent be given

## **7.6 Traffic and Transport – to include:**

- Effectiveness, enforcement and monitoring of the Transport Strategy and site travel plan, including consideration of movement of people and freight by mode of travel and the extent to which it meets the requirements set out in the Local Plan
- Robustness of the Environmental Statement with regard to measuring impacts at the most sensitive times, i.e. when people are most likely to be using the B1122 and other roads on foot and cycle.
- Suitability of the Transport Assessment and modelling approaches.

- Effects on local road networks and roads, including access, congestion, road danger and disruption.
- Effects on emergency services.
- Effects on the Strategic Road Network (SRN).
- Effects on PRow and Non-Motorised User (NMU) routes
- Effectiveness of mitigation and control measures, monitoring and enforcement.
- Consideration of effects of other developments.

## **7.7 Air Quality**

The Local Planning Authority and Public Protection departments need to be in a position to ensure that the applicant addresses local Air Quality through

- its air Quality impact baseline assessment methodology;
- dealing with effects on air quality arising from dust and particulates during the construction phase including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- dealing with effects on air quality arising from dust and particulates during the operational phase including through changes in vehicular activity and changes in distances between sources of emissions and air quality sensitive receptors;
- mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP);
- dealing with effects on air quality arising from dust and particulates during the decommissioning of the Proposed Development including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- the adequacy of the environmental measures incorporated into the design and mitigation proposal and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.

## **7.8 Draft Development Consent Order – to include:**

- The s.106 agreement and other obligations and agreements
- Regulatory approvals and environmental permits.
- Adequacy of the dDCO Requirements, and associated provisions and documents, their status and enforceability to secure the proposed mitigation (primary, secondary and tertiary) and monitoring.
- Whether any additional Requirements are necessary.
- Whether the flexibility that the scheme currently provides in terms of detailed design can be justified and represents a reasonable approach.
- The proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents and appeals, including arbitration.

- The need for and means of securing funding for any necessary monitoring and enforcement of the dDCO Requirements.
- The explanatory memorandum.

#### **7.9 Flood risk, ground water, surface water – to include:**

- Effectiveness of Flood Risk Assessments (FRA) for the main development site and all other associated development sites in considering the effects of coastal, fluvial, surface water, groundwater, sewers and other sources of flooding, taking into account climate change.
- Effects on groundwater and surface water, including Source Protection Zones, water dependent resources and receptors from the construction and operational phases of the proposed development.
- Effectiveness of mitigation measures and monitoring.
- Compliance with the Water Framework Directive.

#### **7.10 Health and wellbeing – to include:**

- Potential adverse effects on human health and the living conditions of local residents during construction and operation including those arising from air quality, noise and vibration, visual impact and pollution.
- The overall impact upon human health and the living conditions of local residents taking into account the cumulative effects of the proposed development itself and with other development.
- Whether there is a need for on-going monitoring of any potential adverse health effects?

#### **7.11 Historic environment (terrestrial and marine) – to include:**

- Effects on the terrestrial heritage assets and their visual and functional settings, and on buried and marine archaeology.
- Future archaeological investigation, monitoring and supervision.

#### **7.12 Landscape impact, visual effects and design – to include:**

- Design of the proposal.
- Impact on landscape and visual amenity, including the settings of protected landscapes.
- The effects of temporary and permanent lighting on the landscape and visual amenity.
- Effects on amenity and views from the PRow network.
- Effectiveness of mitigation.
- Cumulative effects.

#### **7.13 Noise and vibration – to include:**

- Noise and vibration baseline noise survey methodologies.
- Noise and vibration from traffic, rail and other operations generated through construction, maintenance and decommissioning.



- Construction, operational and decommissioning noise and vibration effects on residents, businesses and wildlife.
- Maximum noise levels and exposures and working hours. Establishing the maxima, and monitoring and enforcement throughout the development.
- Proposed monitoring and mitigation measures, including noise and vibration reduction measures, working hours, techniques and practices and the means whereby this would be secured by the dDCO and CoCP.

#### **7.14 Policy and need – to include:**

- The need for the proposed development including in terms of national considerations and the local economy.
- In particular, the current role and status of NPSs EN-1 and EN-6 including whether there has been any relevant change of circumstances that would call into question whether the assessment of need for sites set out in the NPSs remains up to date?
- Whether site circumstances have changed at Sizewell to the extent that the NPS policies for Sizewell C can no longer be regarded as being up to date including changes to the nominated site area?
- Radiological considerations – to include:
  - Adequacy of provision of facilities for the safe storage of Intermediate Level Waste (ILW) and spent fuel rods. Whether contingency is adequate?
  - Longer term plans for this storage and how this would be facilitated and maintained.

#### **7.15 Socio-economic – to include:**

- Monitoring and mitigation of community impacts
- Baseline assessment methodology and socio-economic evaluation.
- Effects of incoming workers on the receiving communities (including law and order considerations, schooling and impact on community facilities).
- Effects on health on the receiving communities and on the incoming workforce.
- Effects on accommodation.
- Effects in relation to temporary on-site accommodation.
- Effects on local businesses including tourism and the local supply chain.
- Effects on the labour market.

#### **7.16 Waste (conventional) and material resource – to include:**

- Effectiveness of Conventional Waste Management Strategy.
- Effects on the supply of potable and non-potable water during construction.