

EDF ENERGY - SIZEWELL C DEVELOPMENT CONSENT ORDER

RELEVANT REPRESENTATION OF

THEBERTON AND EASTBRIDGE PARISH COUNCIL

Introduction

Theberton

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

Eastbridge

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is the location for RSPB Minsmere. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the dark skies, the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via the National Trust's Dunwich Coastguard Cottages.

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, pheasant, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors benefit from the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Representation Summary

The Parish Council (TEPC) is concerned that EDF's Sizewell C (SZC) Development Consent Order Application (DCO) is premature, lacks sufficient rigour and, in keeping with our previously stated requests for information during four stages of consultation, still fails to provide sufficient evidence, justifications and/or mitigations/compensation for the impacts of the development. In short,

- Compliance with Planning Act 2008 (as amended) and EN-1 and EN-6
- Site suitability and size
- Plans, mitigations, and compensation insufficiently developed for assessment
- Transport and Freight strategy
- Suitability and justification of worker accommodation strategy
- Widespread environmental and landscape impacts
- Narrow and unrealistic assessment of coastal and marine impacts
- Lack of specific blight and impact mitigations for residents in proximity to SZC construction site and transport routes
- Need for independent assessment and compensation mechanisms for resident impacts that take account of individual circumstances
- Lack of cumulative impact assessments

- Reports relied upon but not evidenced in the DCO submission

2. Transport and Freight Strategy

Issues for TEPC over the early years and for the whole of development period include,

- B1122 mitigations, crossing, speed limits, visibility improvements previously suggested now form no part of the proposal
- Pretty Road and Moat Road will be closed to traffic, severing community access
- Insufficient monitoring for listed buildings along and close to the B1122
- No proposals for noise mitigation for Theberton houses
- Reductions expected in traffic levels from the combined road and rail integrated strategy have not been realized and levels now exceed those originally proposed for the road-led strategy
- The SLR development schedule is inappropriate considering the levels of expected traffic in the early years and during SZB relocation works
- Cumulative impacts of the other seven or eight energy projects is not assessed
- Insufficient controls for cars and LGV travelling to and accessing the construction site
- Eastbridge single roads, particularly from Westleton through Minsmere (RSPB private road), will become a rat-run for workers and should be controlled
- Speed limits should be introduced in Eastbridge
- EDF need to monitor and prevent fly-parking

3. Main Development Site

The construction site comes within 250m of the village of Eastbridge and will significantly impact the community. Areas of concern include,

- The platform size at 32 hectares is too small for two nuclear reactors and is well below the EN-6 suggested size leading to unacceptable compromises within the AONB
- Significant losses of mature woodland will ensue and will take many decades to re-instate reducing biodiversity
- Risks to the coastal frontage and wider communities from incomplete design of sea defences, restricted zone of influence, compared to Secretary of State Scoping Opinions, and unexplained about-face assessment of coastal geomorphology influences
- Inadequate inland hydrological assessments of the effect of Water Management Zones, the SSSI crossing, realignment of the Sizewell Drain, changes to the flow characteristics of ground and surface water through the Causeway/Culvert crossing and the onward impacts into Minsmere valley and the Minsmere sluice
- Lack of a coherent, evidenced and impact assessed plan for water supply during site development and operation.
- Opaque carbon Life Cycle Assessment scoping out decommissioning and long term spent fuel management with unsupportable claims of CO2 emissions savings
- Operational waste heat vented to the environment not assessed against Paris climate agreement, 2050 net zero commitments or UK Committee for Climate Change reports
- Significant increases in light, dust and noise pollution for the Parish but particularly for Eastbridge but not adequately recognized for their severity
- Reports referenced but not provided for assessment and examination

4. Accommodation

Impacts from the 2,400-worker campus are expected both from traffic and simple impact of numbers compared to the parish and Leiston populations. Furthermore,

- Noise and light pollution will impact the local communities surrounding the site
- Alternative sites suggested by EDF and by external reports but justifications for selecting the single Eastbridge Lane site are poorly evidenced
- Suggestions that a site which could leave a long-term legacy for affordable housing has been rejected without valid justification

- No additional planning for accommodation has been made since the maximum workforce rose from 5,400 to 7,900 relying entirely on scant available rental accommodation in the area impacting a vibrant tourism sector and the social housing sector

5. Environment and Biodiversity

SZC site sits between multiple international, national and local designated sites including offshore designations. The construction site severs Suffolk Coast and Heaths AONB for 10-12 years. Our concerns are as follows,

- The potential effects of the hydrological disturbance referred to earlier has not been properly assessed with regards to the marsh, ditch systems and the various fauna and flora assemblages that make this area one of the most biodiverse in the country
- Impacts on protected bird, insect, reptile and mammal species cannot be properly assessed as a significant number of assessments are out of date
- EDF admit that impacts on the protected Marsh Harrier cannot be fully mitigated or compensated for
- Some site designations, including the AONB and SSSI are potentially at risk because of this proposed development
- There are unsubstantiated claims for embedded mitigations for pollution and runoff from site roads, spoil heaps and borrow pits

6. Socio-Economic Impacts

Theberton and Eastbridge are small communities. The two villages are significantly dependent upon tourism. Residents also work at SZB, so we are aware of the value of the operating nuclear power station. However, a project the size of SZC brings a new level of concern,

- EDF's projections show a significant number of visitors will be deterred from visiting the area whilst the construction is ongoing
- Impacts to the two pubs in the district will not be easily mitigated and suggestions that advertising will help are not substantiated
- Issues for residents in engaging local trades services are likely to be impacted due to displacement of existing trades to SZC jobs with no replacements available
- As a result of worker displacement, local businesses may fail, or engagements will be made less available or delayed potentially causing damage or safety issues in the home and at business premises
- Details of mitigation funds and eligibility to access such funds is inadequate
- Pressure on local housing in the private rented sector due to EDF seeking increases in houses of multiple occupancy will cause existing renters in the vulnerable and social housing sectors to be disadvantaged and priced out of the market
- Holiday rentals are expected by EDF to provide some of the required accommodation as there will be a reduction in visitors to the area but lower rates available from SZC workers may make providers from the holiday rental sector unviable
- The proposed Sizewell Link Road will divide farms and fields making some family farms no longer viable
- Delays to emergency service responses will increase due to traffic on A12 and B1122

7. Endorsements

We endorse the Relevant Representations of,

- Theberton and Eastbridge Action Group on Sizewell (Stop Sizewell C)
- Minsmere Levels Stakeholders Group
- B1122 Action Group
- Royal Society for the Protection of Birds
- Suffolk Wildlife Trust