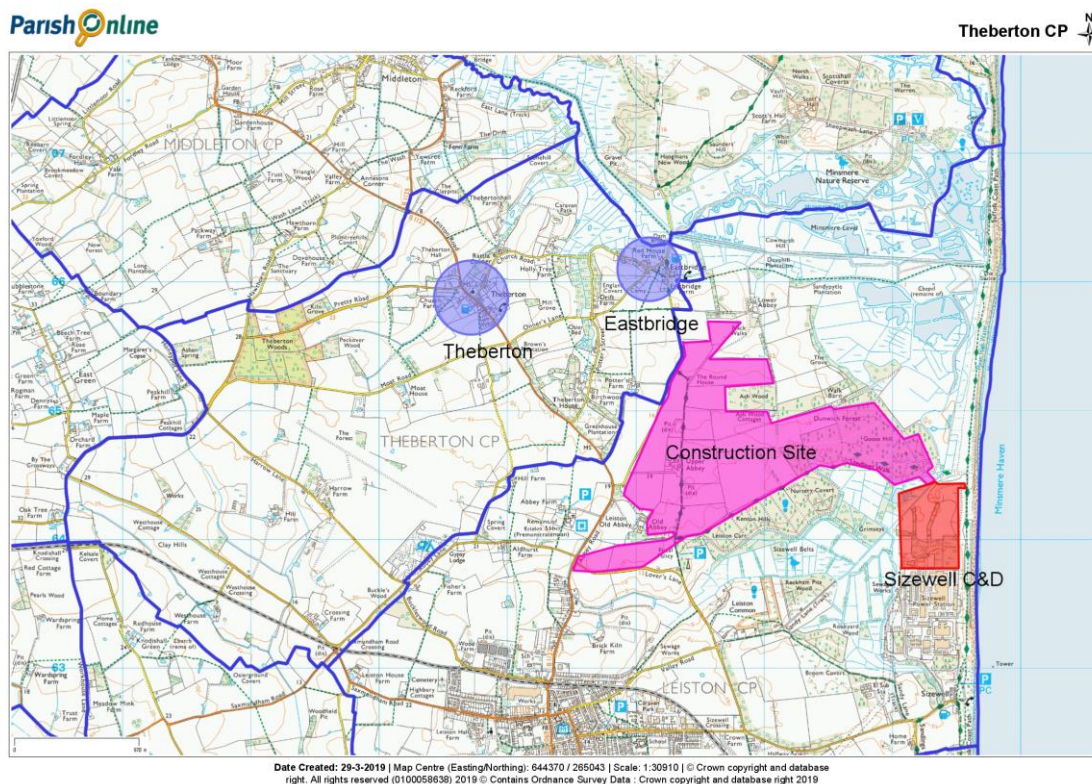


EDF ENERGY - SIZEWELL C - INTRA-EXAMINATION CONSULTATION

RESPONSE FROM THEBERTON AND EASTBRIDGE PARISH COUNCIL (TEPC)

Introduction



Theberton

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

Eastbridge

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

Both villages are chiefly agricultural, and people live there historically or by choice for the tranquility, dark skies, and the proximity to the Suffolk Heritage Coast. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Summary

- 1.1 **This Intra-Examination Consultation (IEC) response should be seen as an extension to our four pre-application consultation responses and Relevant Representation. Where previous responses reference, reject or support proposals/options presented by EDF and additional options are presented in this consultation, our support or otherwise for the newly presented options do not negate our prior support for previous options or change our view that in many cases, insufficient assessment and justifications have been provided by EDF for the progression of their preferred option or proposal.**
- 1.2 TEPC is, once again, disappointed that EDF have submitted this extremely late IEC only days after the s56 consultation finished. It includes significant changes and proposals that must have been prepared well in advance of the start of the s56 consultation and most likely in advance of the submission of the Development Consent Order (DCO). Such total disregard for the impact upon local communities, local and statutory authorities of yet another consultation after submitting its 50,000 page-plus DCO application can only be seen as evidence that EDF are incapable of planning such a massive project in such a relatively remote location with inadequate infrastructure, eroding coastline and totally surrounded by rare designated and sensitive habitats.
- 1.3 To make matters worse, apart from some clear changes in land requirements for associated developments such as Sizewell Link Road (SLR), Two Villages Bypass, and Park and Rides etc., other proposals are short on detail and consequently not possible to assess properly because of a lack of plans, supporting information and confidence that some of the options presented (e.g., Sizewell B Facilities Hybrid Relocation and increases in rail delivery) can even be delivered.
- 1.4 In the case of the temporary Beach Landing Facility, we are presented with four options which should not be options at all. If EDF are to remove as many as possible HGVs from the roads and maximise rail and sea usage, EDF should be making optional proposals which can achieve that objective with minimum coastal impact.
- 1.5 As far as the rail options are concerned, we continue to be disappointed that insufficient confidence can be applied to these changes after eight 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.
- 1.6 The new proposal for a single span bridge crossing of the SSSI still requires a significant loss of SSSI land. Whilst the splayed eastern entrance and increased width, of what is arguably still a culvert, will reduce the length of the covered portion east to west but will still result in a large area of darkened land beneath the bridge which will end up barren and a barrier to many species. Previous consultation bridge options were of a more classic pillar design with significantly more open area with light penetration which this adjusted causeway/culvert proposal simply does not provide.
- 1.7 We remain concerned that the environmental impacts associated with such a large development between two significant Sites of Special Scientific Interest and a construction site that will split the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) in two, for at least 10-12 years, are not justifiable.

- 1.8 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, Wet Woodland 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.
- 1.9 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.
- 1.10 Despite proposals;
- (a) to further reduce one pylon height
 - (b) the still incomplete hard coastal defence feature (HCDF) plans
 - (c) the proposal to raise the HCDF height yet further resulting a more easterly overall platform footprint
 - (d) the highly constrained nature of the platform site

it remains obvious that the attempt to squeeze two nuclear reactors on this site is inappropriate.

The 32-hectare platform compared to 45 hectares at Hinkley Point and an understanding in National Policy Statement EN-6 that single reactor site would require approximately 30 hectares only go to reinforce the case for reducing the site to a single EPR installation.

- 1.11 It remains our opinion that the SLR proposal is in the wrong place, does not relieve impacts placed upon the residents, farmers, sensitive buildings and businesses along its length. It closes roads and interrupts public rights of way (PRoW). It also has limited use post construction as the road runs parallel to the existing B1122. We again state that a relief road that has minimal impact, such as the D2, or W from Stage 3 documents, offers reduced impact, shorter journeys for ~80% of traffic coming from the south and a positive legacy for Sizewell, Leiston, Yoxford, Middleton and Theberton.
- 1.12 We have become increasingly aware that despite all the attempts to reduce HGV traffic to the site, traffic in the early years along the B1122 cannot be reduced and is now at a level that is as high as the levels suggested should EDF succeed in reducing HGV traffic through additional rail and sea deliveries for bulk materials by the maximum contained within this highly aspirational document. The schedule for starting work on the SLR needs to be advanced or work on site should be delayed until such time as the SLR is operational.
- 1.13 The uncertainty with which many of these plans are being presented for consultation do not give any level of confidence that EDF are anywhere close to being ready to provide a properly considered plan for examination by PINS let alone consult with local authorities, other statutory authorities and the affected public.

2. Environment

- 2.1 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 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.
- 2.2 Whilst additional Fen Meadow compensation land at Pakenham is included in this IEC, we are concerned that the overall compensation land will not be functional before the loss of the equivalent land at Sizewell. Also, the areas defined are remote and not connected to the area where the habitat loss is incurred. Habitats are not singular entities that are

independent of surrounding habitats. The implicit suggestion that such remote habitats can replace habitat loss within the diverse and rich environment at Sizewell Marsh is unsupported. This comment applies equally to the compensation habitats at Benhall and Halesworth proposed in prior consultations. It is very difficult to create habitats such as fen meadow or wet woodland and there is a significant risk that these habitats will simply fail to establish or be successful in the long term. This is why compensatory habitats should always be created and functional before the habitat loss is incurred. This will be impossible in this case and as such the project should be delayed until the compensatory habitats are established successfully.

- 2.3 The move of the reservoir into the area next to the borrow pits and water management zone release the area next to Minsmere South Levels for flood defence and additional habitat creation. Reference is made to the area being potentially suitable, later, for 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.
- 2.4 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 the adverse impacts and current deficiencies of this project can be resolved.

3. SSSI Causeway Crossing

- 3.1 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.
- 3.2 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.
- 3.3 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.
- 3.4 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 SZC platform.
- 3.5 There is still a potential for coastal breach to occur north of the SZC 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.

4. Managing Construction Materials

- 4.1 The addition of a new stockpile because of increased sea and rail deliveries and additional excavations to remove “incompetent crag formation” from the platform, referred to at a meeting with TEPC, is unfortunate considering the already large area given over to even larger spoil heaps and stockpiles.
- 4.2 We are still very concerned about the management and landscape visual impact of these stockpiles and spoil heaps, given the height of these features compared to the relatively flat topography of the area, 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.

5. Sizewell Link Road & Rail

- 5.1 We are dismayed by increased land requirements along the proposed Sizewell Link Road (SLR) which will result in further pressure on the viability of several family and small farms along the route. We are of the opinion that the SLR is an inappropriate solution to the high level of HGV and other traffic associated with the SZC development.
- 5.2 A road bridge should replace the pedestrian only bridge on Pretty Lane to avoid severance from Saxmundham, where a significant number of people in the area are registered for medical and dental services as well as it providing the primary access route to Saxmundham station. This is the main access route from Theberton and Eastbridge to Saxmundham. It is a wide lane suitable for two vehicles to pass compared to Moat Road which is a single-track lane with few passing places. Keeping Pretty Lane open will provide an alternate route of access for emergency vehicles, critical to public safety, given the vulnerability of our ageing population and the very serious risks of blockages on other available routes.
- 5.3 The Moat Road connection to the SLR will be a relatively hazardous junction for traffic turning right towards Leiston or traffic turning right towards Saxmundham. This junction will encourage a significant increase in traffic onto a single-track lane which is inappropriate.
- 5.4 We are still of the opinion that insufficient analysis and justifications have been given for rejecting other optional routes, in particular route W (also referred to as D2) which with some minor modifications could have provided a route with significantly less heritage, PRow and residential impacts whilst providing a positive legacy for Leiston and better access for both Sizewell and the proposed wind farm and interconnector developments in the Leiston area.
- 5.5 We note that Suffolk County Council as Highways Authority, still question the value of the SLR as a permanent addition to the road network as it runs parallel to the B1122 and remain supportive of route W as a positive legacy. Route W will also provide reductions in journey times, CO₂ and NOX emissions for the majority (~80%) of HGVs and Park & Ride busses from the south. The route would also be taken up by many of the LGV and other deliveries to the site as they are also most likely to be travelling up the A12 from Ipswich or the A14.
- 5.6 We note that whilst there appears to be a possibility of reduced HGV traffic should EDF and Network Rail be able to come to a satisfactory agreement on increasing the number of trains by one per day or two per day at peak, this is by no means certain. It is regrettable that we are essentially being consulted on a request that has been made over the past four consultations to reduce HGV traffic on the roads and yet even now this remains just a possibility and is not a definitive deliverable plan for consideration.

- 5.7 We note that the new transport strategy proposals will potentially include 6 days per week and extended hours of operation, and we object to these additional operations on the basis that noise and light pollution will affect all communities that live along the entire transport corridor from the A12/A14 junction to the site, as well as to those living along the rail route from Westerfield to Leiston and the site from whatever sources are being used for aggregate and other materials.

6. Temporary Beach Landing Facility

- 6.1 The four options presented are not really options at all for assessment by the public and consultees. 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 experienced from jetty use during the Sizewell B development.
- 6.2 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.
- 6.3 As Option 4 would appear to provide the least disturbance to the near shore and beach environment, as it extends beyond the near-shore bar, this would appear to be the most suitable of the four options, but that must be subject to comments expressed above.
- 6.4 Reference, at a meeting on 9th December 2020 with TEPC, was made to the potential for additional stabilization piles that may be required for the platforms for winter stability. It is regrettable that the options described in the consultation remain incomplete and that impacts on the coast, as a result, are still unclear.
- 6.5 In the same meeting, referenced above, when asked whether it was possible that the platform based temporary BLF could end up being a simple jetty structure for hosting the conveyor system, it was confirmed that this possibility has not been ruled out. It would have been preferable that this option had been presented in this consultation rather than potentially having it sprung on consultees when the changes are submitted to the Planning Inspectorate or even later during the DCO Examination process.

7. Coastal Defence Features

- 7.1 At all previous consultations and in the DCO application plans for the seaward defence of the site have been sketchy and 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.
- 7.2 This consultation does 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.
- 7.3 There is a second sketch that shows the adapted HCDF one meter 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.

- 7.4 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.
- 7.5 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.
- 7.6 With a HCDF toe much further forward than previously proposed, the effect on sediment transport across the Sizewell frontage and beyond will be exacerbated.
- 7.7 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 SZC frontage as well as potentially to the frontages for SZB and SZA.
- 7.8 Sediment accretion to the north of the HCDF and BLF, referenced in the DCO application, 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 EDF made clear in a previous consultation that accretion at the Sizewell B jetty had effects further south at Thorpeness and Aldeburgh.
- 7.9 The DCO application suggested that the HCDF shown in sketches within those documents would likely be exposed in 2050. The current consultation suggests the HCDF would require adaptation in 2046, 12 years after the proposed beginning of power generation in 2034. 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 plans, as have been provided over 5 consultations and the DCO application, are simply not credible and are thus unacceptable.

8. Conclusions

- 8.1 Theberton and Eastbridge Parish Council are not anti-nuclear. However, as currently proposed, we cannot support the development and have stated that TEPC now actively oppose the development. This consultation does nothing to change that decision and if anything reinforces the decision taken after the Stage 4 Consultation.
- 8.2 We do not find that the project is appropriately sized given the size of the platform available (32ha) and have continuing concerns regarding the adequacy and the long term deliverability of the hard coastal defence and possible effects on coastal erosion.
- 8.3 Reduction to a single nuclear reactor would enable adequate coastal defences to be proposed, reduce the impact on the surrounding AONB and designated habitats at Sizewell Marsh and Minsmere. It would also reduce the project length and impact on communities as a result.
- 8.4 We support SCC in their representations stating that the "benefits do not outweigh the disbenefits" of the SZC development and Natural England who stated that "in its current form the development should not be approved" and we note East Suffolk Council's neutral stance and also their significant concerns regarding the HCDF and coastal erosion.
- 8.5 We support the responses of RSPB, Suffolk Wildlife Trust, Minsmere Levels Stakeholders Group.