# Sizewell C Development Consent Order Written Representations Summary Document

of Robert, Helen and Colin Flindall

Eastbridge Leiston Suffolk

## Summary of our objections to Sizewell C

My family and I live at in Eastbridge, just 400m from the proposed Sizewell C construction site. This is a summary of our response to the Sizewell C Development Consent Order (DCO). We find the scale of the proposed development and construction alarming and saddening for the future of our community and for this beautiful part of East Suffolk, the Suffolk Coast and Heaths AONB and the internationally renowned RSPB Minsmere nature reserve.

We are deeply concerned that the development of the twin reactor project exceeds the practical capacity of the proposed Sizewell C platform. The constrained power station platform is dictating unacceptable changes in site protection, layout and access that threatens the long-term safety and environmental integrity of the site and its surroundings and the legacy left for nearby communities and businesses once work has been completed.

The Sizewell C 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.

We believe that a twin reactor project at Sizewell cannot be realised in a manner which is safe over the timescales envisaged between construction and final decommissioning. We are do not agree that the proposed development could have 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 result in irreparable damage to the East Suffolk visitor economy.

We believe that the cumulative adverse impacts of the proposed development on the community considerably outweigh the claimed benefits and that, as a result, we conclude that the proposed development should be rejected.

# **Government Policy**

In 2011 the UK Government in its National Policy Statement for Nuclear Power Generation EN-6 concluded that for Sizewell, *This assessment has outlined that there are a number of areas which will require further consideration by the applicant, the IPC and/or the regulators should an application for development consent come forward, including amongst other things effects and mitigating actions of coastal erosion, effects on biodiversity including the SSSI that is partially included in the site boundary, and the visual impact on the AONB. But at that time the Government concluded that none of these factors is sufficient to prevent the site from being considered as potentially suitable.* 

Since 2011much has changed in the energy industry and daily we hear of advances in renewables technologies. At Sizewell the site circumstances have changed 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? These changes call into question whether the assessment of need for sites set out in the NPSs remains up to date?

Today the site and proposed development

- is at risk from climate change and sea level rise and fluvial flooding;
- would have an enormous adverse impact on adjacent internationally designated sites of ecological importance;
- would have an adverse impact on coastal processes on a very sensitive landscape;
- would have an adverse impact on sites of amenity, cultural heritage and landscape value;
- 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.

We argue, therefore, that the Sizewell site is not the 'potentially suitable site for new nuclear power stations before 2025' identified by the UK Government in 2011 in EN-6.

## **Accommodation Campus**

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 rental accommodation in the area impacting a vibrant tourism sector and the social housing sector

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

This aspect of the development would be unacceptable due to its proximity to Eastbridge and several individual residential properties. This is because of the threat of the many environmental implications identified as relevant in the Suffolk Minerals and Waste Local Plan. Both aspects of the development would have a significant adverse impact on local communities and we believe that they do not satisfy policies MP3 and GP4 of the Plan. The proposals do not adequately assess or satisfactorily mitigate any potentially significant adverse impacts.

## **Transport**

The amount of road based transport proposed would have an enormous impact on local communities and result in long term damage to the East Suffolk visitor economy. The proposed route of the Sizewell Link Road is unacceptable. Alternatives exist, in particular to the south of Saxmundham, and have been dismissed as options by the applicant with no adequate or proven reasons given. The proposed delay in the start of construction of the Link Road (not to be completed until year 3 of the development) would mean that the B1122 would carry up to 3 years of substantially increased traffic with a consequential adverse impact on communities and road safety; at the same time as the Sizewell C construction traffic.

## Landscape

The proposed development site is not suitable because it will not mitigate the visual impact on the Suffolk Coast and Heaths AONB or the Suffolk Heritage Coast as envisaged by the Government in its National Policy Statement for Nuclear Power Generation (EN-6). The proposed development and link road would not meet the goals of the UK Government's 25 year Environment Plan for 'Enhanced beauty, heritage and engagement with the natural environment'. It would also have an adverse impact on the quality and integrity of the many nationally and internationally important nature conservation areas in the locality.

#### **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 St Peter's Church Theberton and Leiston Abbey.

#### **Environment**

We strongly object to the 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 missalignment of submission of Environmental Permits applications, the Nuclear Site License application and the DCO application.

#### **Social Impacts**

We believe that the proposed development would leave a legacy of adverse social impacts on communities. These would be impacted by an influx of construction

workers and there are likely to be effects on health in 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.

## **Tourism and Economy**

We believe the £250m local tourism industry will be damaged throughout the period of construction and beyond. Noise, dust, loss of access and visual impacts will deter visitors to the coast between Southwold and Aldeburgh. EDF has provided inadequate information about impacts on tourism. Moreover, with EDF needing to reduce 20% from the cost of Sizewell, it plans to use the Hinkley C supply chain. EDF must quantify how their savings will impact economic and employment benefits for the local area.

# **Cumulative Impact**

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast is enormous and would adversely impact the lives of Suffolk residents and the built and natural heritage for many years to come. These include Sizewell C, Sizewell B, the SPR 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 adverse impacts of these development projects to Suffolk life would be overwhelming for communities and result in significant industrialisation of the area.

## **Draft Development Consent Order**

We are extremely concerned that the proposed provisions of the Draft DCO, prepared by the applicant, are carefully scrutinised by the ExA, in particular because of its many impacts on local communities most impacted 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 and afterwards.

Robert, Helen and Colin Flindall 2<sup>nd</sup> June 2021