Minsmere Levels Stakeholders Group Open Floor Hearing Transcript

Good morning and thank you for giving me the opportunity to address you this morning.

Minsmere Levels Stakeholders Group is concerned with both the inland hydrology and maintenance of the Minsmere Valley, its designated habitats and various farm activities, mainly as marsh grazing in summer months. We also work with the various statutory agencies on coastal protection, drainage through the Minsmere Sluice and contribute to the Suffolk wide coastal group Suffolk Coast Acting for Resilience.

Minsmere Levels Stakeholders Group main areas of concern regarding the Sizewell C development proposal are as follows. The Hard and Soft Coastal Defence, the Permanent and Temporary Beach Landing Facilities and impacts on the inland hydrology of both Sizewell Marsh and Minsmere South Levels as a result of the loss of Sizewell Marsh SSSI land, redirection of the Sizewell Drain, the SSSI Crossing and impacts of the borrow pits and spoil heaps.

Firstly: The design of the Hard Coastal Defence and Soft Coastal defence should be one of the primary inputs to the design of an effective Coastal Processes Monitoring and Mitigation Plan.

The absence of a design for the Hard Coastal Defence and Soft Coastal defence can only result in a Coastal Process Monitoring and Mitigation Plan that is long on hope and short on practical reality. This approach is effectively putting the cart before the horse.

EDF have stated during the preliminary Meeting that the cross-sectional Figures 2.2.20, 2.2.22 and 2.2.25 in Environmental Statement Addendum, Vol 2, Chapter 2 (AS-190) alongside the Main Site Parameter Plan (AS-118) are sufficient to define the construction and location of the combined defence.

However, the three cross sections provided do not indicate where within the frontage these are located and there are inconsistencies between the figures with no consistent reference points to the cut-off wall, which is also the border between parameter zones C1 (cut-off wall) and C21 (HCDF/SCDF) (AS-118). One of the figures has no room to allow the adaptation increase in height of the HCDF and there is an inconsistency between figures regarding the toe of the adapted HCDF and statement 2.2.194 in the Environmental Statement Addendum (AS-181).

Whilst we await the detailed plans for the HCDF/SCDF at Deadline 2, we are concerned that unless cross-sections are given for the interface with SZB defences, the frontage at several locations and one through the reconstructed northern mound and BLF access roadway, a full evaluation will not be possible.

Secondly: The latest iteration of the permanent BLF with its removable roadway platform has a considerably different look and feel to those shown during consultation 3, the original DCO submission and the, now accepted, changes to the Development Consent Order.

Originally, when not in use, no crossbeams were evident in the design presented for consultation 3 (Figure 2.10) implying minimal impact on

the coastal landscape and for users of the beach and Suffolk Coastal Footpath, which is to become part of the newly designated England Coast Footpath.

We are now presented with a longer BLF structure with piles and permanent crossbeams marching all the way to the BLF access road termination atop the Soft Coastal Defence Feature at ~6m AOD according to the Figure 2.2.3 ES Addendum V2 6.14 Ch2 Part 1 (AS-190). To what extent the temporary roadway for the permanent BLF is removable is also not clear in plans and sections given in PDA-005.

This new permanent structure will be very detrimental to the character of the beach from all viewpoints, including from the sea and will be in place for the duration of the construction, the operational lifetime of Sizewell C and, more than likely, throughout the decommissioning stages to remove many of the Abnormal Indivisible Loads that will be brought to the site using this facility.

This structure is incompatible with the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and the Suffolk Heritage Coast designations.

It is also unclear how the Hard Coastal Defence will incorporate and wrap round the access roadway given the position of the landward end of the BLF access roadway, the removable roadway and the piles and crossbeams progressing towards the barge mooring end of the structure 100m from the coast.

During consultations the slope of rock armour at the end of the permanent roadway was given as 1:4. In the plans referenced above, the roadway is given as being 5.435m AOD this will require about 22m of rock armour to reach 0m OD, the same level as the initial toe of the Hard Coastal Defence. This implies a significant incursion into the beach itself.

This is especially important as it is this part of the SZC coastal development that will be the primary hard point associated with any coastal impacts and it appears to be significantly seaward of the main HCDF structure.

Given the current lack of detail and inconsistencies present regarding all the coastal infrastructure in the original DCO and subsequent changes documentation, it is difficult to see how any Coastal Process Monitoring and Mitigation Plan can be developed in the absence of such critical detail.

It is simply beyond belief that EDF in the ten years of consultations that a design of the coastal defence is only just becoming available given EDF's knowledge of the Sizewell B installation that EDF have manged for several decades.

We are also unhappy that EDF have defined the Zone of Influence as a 3km coastal strip centred on SZC. When the original jetty proposal was removed from proposals during at consultation 3, one of the reasons given was impacts of the SZB jetty at Thorpeness and Aldeburgh, both well outside of the 3km Zone of Influence.

EDF's attempts to secure this aspect of the DCO through the CPMMP and DCO requirements simply conveys a continuing lack of openness and consultation that has been a characteristic of the process from the first consultation to this day.

Thirdly: The proposed temporary Beach Landing Facility, actually a light jetty not as was consulted upon in November and December 2020, adds yet another structure that is completely incompatible with the AONB and Heritage Coast designations.

Whilst we recognise the fact that this part of the proposal is for a light jetty which will only support a conveyor for aggregates and will reduce the need for transportation via HGVs, which in principle we support, it will still have an impact on coastal shingle transport across the frontage.

Noise from the conveyor system, that will travel deep within the very long and narrow site footprint, will further add to construction noise and may also create additional problems with fugitive dust from the finer aggregates including sand and other possible materials such as the blast furnace slag powders that were inadvertently released from a collapsed silo at Hinkley Point C construction site.

Fourthly: The latest iteration of the SSSI crossing proposes a wider culvert, which still does not provide an open environment for wildlife to transit between Minsmere Southern Levels and the Sizewell Marsh.

There is still effectively a dead zone inside the culvert structure that will be totally dark. The applicant has still not given a valid reason why the three-section bridge structure initially proposed in the earliest consultations, which would allow natural light below the roadway, has been rejected. This despite the fact that Natural England and the Environment Agency and others continue to object to the culvert design.

The result of the power station platform and crossing is loss of Sizewell Marsh SSSI designated land and severe unavoidable impacts on invertebrates, which will not traverse the culvert structure. This structure will sever the connection between Sizewell Marsh SSSI and Minsmere-Walberswick Heaths and Marshes SSSI with its associated SAC, SPA and Ramsar designations.

The SSSI crossing structure, which is piled and surrounded by sheet piling (PDA-005), will also interfere with the ground and surface water hydrology features of these connected areas. We do not agree with the assessment that the effects will be minor especially given the applicants admission that water levels in the southern Minsmere Levels will be raised, resulting in a flood risk compensation area being created in the southern Minsmere Levels. Modelling results quoted in the updated flood risk assessment (AS-018) 12.7.4 through 12.7.8 indicates some increase in risk to Minsmere Levels, although a small potential benefit to Sizewell Marsh and on to Leiston as a result of the presence of the SSSI crossing. This implies increased drainage from Sizewell Marsh and interference with the hydrological connection between these two areas. Another consequence of this will be potential

impacts at Minsmere Sluice where Scott's Hall Drain (from Minsmere Levels to the north of the New Cut) joins Leiston Drain in the southern sluice chamber before draining to the North Sea.

Invertebrates in the coastal fen meadow that is being lost at Sizewell Marsh are one of the special features that Sizewell Marsh is listed for. None of the compensatory habitats are for coastal fen meadow, they are inland fen meadow, which is also incredibly difficult to establish, so even that inappropriate compensation is at risk.

We have been working with Suffolk Coastal Friends of the Earth on Sizewell Marsh assessments and support their conclusions.

Lastly: Spoil heaps and borrow pits situated to the western side of the Area of Outstanding Natural Beauty pose several potential problems for the Minsmere valley as well as being completely out of place and character from a landscape and visual impact point of view within the AONB.

The borrow pits where EDF hope to extract crag, sand and other materials suitable as backfill for the nuclear platform, will be backfilled with a mixture of excavated materials from the platform, some of which will be lime treated and then mixed with small quantities of highly acidic peat. These materials will become permanent features within the ground and will inevitably change the drainage characteristics and leachate into the Minsmere valley.

The long-term effects of these processes are not well researched and EDF's consultants could not find any studies of such environments in the literature and came to the conclusion that no evidence or research reports indicates that there is no problem.

Lack of research evidence cannot be assumed to be an indicator of support for a "no problem" conclusion.

Spoil heaps of sandy soils reaching 35m and more (Hinkley Point C's spoil heaps have recently had their maximum heights raised to 45m) also present a significant dust hazard to Eastbridge and Minsmere in the summer and autumn months when prevailing winds are from the south and south-west. During winter and spring months the predominant winds are from north-west through to the east and the campus, Leiston and Leiston Abbey will be most affected.

The stability of these spoil heaps along with run-off during wet weather is also a concern, given our experience of such run-off from nearby flat fields during heavy rain.

There are still questions regarding the availability of non-potable water for dust suppression as there is no definitive source quoted in the application for maintenance of the proposed reservoir and some options suggested are highly impractical, such as a pipeline from the Benacre sluice over 25km away.

The oft used phrase that the Sizewell C development will be "a clone" of the Hinkley Point C development is nonsense.

Whilst we would not deny that the reactor and various engineering components as approved through the Generic Design Assessment of the EPR reactor will be the same, that is not the same as the geography and geology of the sites being the same.

One of the reasons given that the Hinkley Point C development is falling behind its construction schedules is that unforeseen problems with ground conditions were encountered.

Fragile ground conditions at Sizewell with sand, shingle, alluvium, peat and coralline crag at the Sizewell C platform site, compared to the limestone and mud rock environment at Hinkley Point, are much more likely to provide a very different difficult environment and more complex ground construction project in comparison.

At the simplest level, the fact that the excavations at Hinkley point reached a depth of 35m and were reached without prior concrete piling whereas the curtain wall at Sizewell will have to reach a depth of ~40-50m to embed itself in the London Clay layer followed by excavation and ground stabilisation is indicative of the clear differences between these two projects.

Our discussions about the Coastal Defences are also a clear example of this with a simple concrete wall defence on limestone bedrock at Hinkley point versus this combination of curtain wall and stabilised rock armour defence at Sizewell resting gingerly on eroding sand and shingle.

In conclusion, this proposed development has too many risks and impacts that cannot be mitigated or compensated and is the wrong project in the wrong place and should not be given consent.

Thank you for listening to me this morning.