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**Subject:** Stage 4 response  
**Date:** 27 September 2019 17:37:21  
**Attachments:** [image001.png](#)  
[N & I Bacon SZC Consultation 4 Response.pdf](#)  
[Mr and Mrs N J Bacon SZC Consultation 3 Response.pdf](#)

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Dear Sir or Madam

Please see attached our response to the Stage 4 consultation.

Regards

**India Bacon**

**ward-farm-logo-hoz**



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**Response to EDF's Stage 4 Consultation**

**Name:** Mr and Mrs N J Bacon

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- **Introduction**

We attach a copy of our response to the Stage 3 Consultation submitted in March 2019, as we feel that Stage 4 Consultation has not address to any significant degree the concerns that we raised in our Stage 3 response.

We seriously urge the Planning Inspectorate to consider whether or not Sizewell is an appropriate location for a building project of such a scale. We are very strongly of the opinion that it isn't. **We do not believe that the disbenefits outweigh the benefits and so this application should not be supported.**

In brief, we still have grave concerns around:

- **Sizewell C proposal overall:**

No new evidence or figures have come to light to make us think that this is a technology that we ought to be investing in to provide our future base load requirements. The economics of the project do not seem to work if and when the project is delivered, the proposed funding model to get it to that stage is flawed in that there has not been any clarity given around contingency planning for overspends (which have to date been significant on other projects undertaken by EDF) – all in all meaning that it is not suitable for support from the Government and the taxpayer.

- **Consultation Process**

The consultation process felt rushed at Stage 3 and feels even more rushed now, with a 4<sup>th</sup> consultation being released within 4 months of the previous one closing and this is reflected in the detail that is provided in the consultation documentation. How a consultation for a project of this scale can be based on maps without scales on them, is beyond belief. How critical reports that are apparently so central in informing the basis for the transport routes can be withheld from public is beyond belief.

- **Transport**

Our concerns expressed in our Stage 3 response remain unaltered now with regards to the transport proposals. The proposed route would have a huge impact on our lives and the viability of our farming business, given the carving up of our irrigated land that will take place and the massive increase in local traffic volumes and all of the issues associated with this.

Our views on the transport issues are expressed in more detail in the Middleton and Theberton Landowners responses at both Stage 3 and Stage 4.

- **Tourism**

Have the impacts of Sizewell C construction truly been considered? We do not believe that they have as we believe that the impact on our local economy through a disastrous reduction in revenue from tourism will be inevitable should this scheme go ahead. We highlighted this in our response to Stage 3 and Stage 4 does nothing to give us any comfort on this point. This concern is compounded by the lack of a joined up approach with other **concurrent schemes** that are proposed for our area.

**This is the Heritage Coast and never should have been and never should be the “Energy Coast”.**

- **Health**

We are also deeply concerned about the effect on the health of local residents that this development will have as a result of 3 main issues:

**Noise** – we believe that the noise levels are going to be unacceptable and that EDF should guarantee that noise levels will be kept to a minimum and reduced during evening, night and early morning shifts. We ask for a noise simulation to take place so that local residents can truly be prepared for what we are to expect and so that more detailed study on the impact of this noise on the local fauna can be carried out.

**Light** - endless studies have been done on the detrimental effect artificial light can have on sleep patterns and mental health and yet EDF are planning to work extended hours during the construction of this power station. This will mean that they will be lighting the site to unacceptable levels that are not at all in keeping with the location of the site given its proximity to local residents and internationally designated areas of countryside.

**Dust** – we have insufficient information regarding the dust control measures that will be taken, but increased dust levels from this sort of construction are a very grave concern to local residents.

The anecdotal evidence that has come back from all people that have visited site at Hinckley have only served to compound these concerns as it is evident that EDF have not put all of the control or mitigation measures in place that had been previously outlined or agreed.

- **Environment**

The environmental impact of the construction and ongoing running of this scheme has not been sufficiently assessed, in our opinion. We echo all of the concerns expressed by the RSPB – this area is not an appropriate site for such a development. We expressed all of this in our response to Stage 3 and again we have not received any comfort as a result of the Stage 4 documentation being released.

**Response to EDF's Stage 3 Consultation**

**Name:** Mr and Mrs N J Bacon

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**Email:** [nat@wardfarming.com](mailto:nat@wardfarming.com)

**1. Introduction**

We are a local farming family with three children who all travel to school locally by car and will do so for at least the next 14 years. Our free time is spent enjoying the local countryside, walking, cycling, visiting the local beaches. Following the second consultation for the proposed development of Sizewell C we continued to imagine that, although there would clearly be an impact on the local communities and of course the local environment, it would not be intolerable or in fact unacceptable. Of course, we understand the need for base load electricity generation.

Following the publication of the third consultation, it is fair to say the contents of which came as a complete surprise to us - we are now very concerned about the impact of this scheme on the local area. We do not see that it will be possible to live and work in this area without unacceptable impacts on everyday life from a great number of angles.

We urge the Planning Inspectorate to consider carefully the scale of this scheme and its unacceptable impact upon the local communities and the environment under these current proposals. We echo the view of the Suffolk Coastal District Council and the Suffolk County Council – that the benefits of this scheme must outweigh the negative impacts to the region. This can not currently be said.

It is now our view that this scheme is now proposed at a level which cannot be permitted. We also support other responses to the EDF's third consultation document including those submitted by:

Middleton and Theberton Landowners

TEAGS

MLSG

## **2. Sizewell C proposal overall:**

Whilst we understand that base load electricity generation is necessary it seems to becoming widely publicised that nuclear energy is no longer a sensible production method.

The technology is seen as too expensive in the current market place and these projects are likely to be left floundering probably before they are even completed, given their un-competitiveness with other technologies which are being developed and enhanced at an unprecedented rate. We are sceptical of an organising that are desperately clinging onto an old technology, currently being seen to manipulate through management of content, the consultation in this planning process through a desperate desire to get this project over the line for financial gain.

The Sizewell C proposal overall is simply too big for the site they have secured on the east Suffolk Coast. It seems that site is more suited to a single reactor development. This would mitigate the impact to levels which are likely to be more acceptable to the local communities and the local environment.

As such we no longer support the construction of Sizewell C power station.

## **3. Consultation Process**

The whole scheme is being rushed through, with EDF showing a desperation to get planning at all costs. The consultation process has simply not been adequate for a project of this scale. The changes from consultation phase 2 to consultation phase 3 are not developments, but major changes. It is unrealistic to pretend that these are design developments based on the previous consultation (2). A number of very significant and unacceptable changes have been made to the transport strategy without adequate prior consultation.

In fact, the proposals now put forward have changed the scheme from one causing significant impacts to the lives of local people, but not at a level where their lives were detrimentally affected, to a scheme which will cause serious impact to their way of life for a number of years to come to an extent which is simply unacceptable.

EDF's land department have been very forceful in requesting access for surveys. Prior to having access agreements in place attempts have been made to access the land for preliminary surveying. Other landowners have felt pressured into letting EDF's representatives onto their land and farms prior to agreements being in place. This bullish nature is unacceptable and even in the situation where a project is recognised as being an NSIP the correct protocol for access to third party land should be followed.

#### **4. Examples of mis communication in the consultation process:**

A prime example of this misrepresentation is the fact that when assessing the impact of the Theberton Bypass, the 750m buffer strip was taken to start at the end of the new tarmac rather than at the end of the construction corridor. This small skewing of the parameters, meant that Leiston Abbey was outside of the buffer zone – thus giving weight to the defence of EDF not developing the option of Route W further. If the buffer zone is applied consistently and sensibly, it becomes clear that Leiston Abbey is affected by all of the proposed access routes which pass by it.

There is almost no consideration given to the impact of traffic movements associated with Sizewell C construction on roads such as the A1120, A12, A14. The publicity events held by EDF have been held in a very small area surrounding the construction site, which is unacceptable given that impact will be far wider. The traffic levels around Woodbridge, Martlesham, Bucklesham, Seven Hill Roundabout, Copdock will all be dramatically affected yet many of those affected are currently unaware of what is being proposed.

The potential impact on other local roads through LGVs and cars through short cutting and "rat running" has been ignored. This is a factor of all construction projects and the impact on these small roads built on limited foundation will be huge. Roads likely to be affected include, but are not limited to:

- B1125 Blythburgh to Middleton
- B1121 Benhall to Saxmundham
- Fordley Road
- Littlemoor Road
- Butcher's Road
- Clayhills Road
- Pretty Road
- Moat Road
- Harrow Lane
- Abbey lane

The response document prompts responses on less controversial elements. E.g, two villages A12 bypass which is locally widely acknowledged as necessary pre Sizewell. At the same time there is no mention of the Theberton Bypass or the SLR route Z in the consultation questionnaire.

Often logical and lower impact alternatives such as road routing options are dismissed without any proper meaningful explanation.

## **5. Transport**

The main impact for our family and our farming business is likely to be that of the traffic volumes. This was not such an issue at stage two where we were led to believe the majority of freight would be brought in by rail and sea. It is hard to see from the consultation documents why these proposals have been dropped, other than their effect on the time scale of the project. This need to reduce timescale should not be at the cost of the way of life for local communities.

EDF currently propose two transport options:

### **a. Rail Led**



The rail led scheme uses up to 5 trains per day to bring freight to the site supported by up to 450 HGV's per day according to EDF's proposals. A new roundabout at Yoxford and a new bypass at Theberton is proposed to help feed traffic to the construction site.

This route depends too heavily on the remainder of the B1122. The new bypass is a vague gesture towards a proper access road for the project. The end result is a bypass road linked to a number of existing roads encouraging shortcutting in on a number of routes from the north and the south of Yoxford. At the same time, access routes vital to local traffic are cut off by the Thebrton Bypass. The Theberton Bypass itself passes very close to the village of Theberton as well as Theberton Hall, which it passes on three sides. The impact of the Theberton Bypass on heritage sites is expanded upon in Dr Richard Hoggett's March 2019 Heritage Report.

The volumes of traffic and the height above datum at which these vehicles will be passing will cause unacceptable levels of disturbance to local residents. The consultation documents include no independent analysis of these impacts, but only pretty pictures of EDF's desktop studies of likely traffic movements. None of these effects seem to be assessed on worst case scenarios.

EDF state that 85% of HGV traffic will approach from the south. Under the rail led scheme all of these HGVs will travel north through Yoxford before using the B1122 to access the Theberton Bypass. The A12 north of the two villages by-pass is already under pressure at peak times. The Saxmundham / Rendham junction of the A12 is already very dangerous and it is hard to imagine that these proposals will provide a satisfactory access solution given these existing pressures and the dependence on these existing roads.

We echo the view of District and County Council in requesting SLR Route W north (formerly D2) to be investigated as a more viable alternative access route to the construction site.

We have expanded on these points and the impact of this scheme on farms along the route of the Theberton Bypass in the Response of the Middleton and Theberton Landowners.

We reject EDF's current proposals for a rail led scheme which seems only to be rail led by name. A truly rail led freight transport scheme would be welcomed.

We reject the proposals for the Theberton Bypass and suggest that it is not an appropriate scheme for this higher level of traffic movements.

**b. Road Led**

The Road led scheme proposes that up to two trains per day and up to 750 HGV deliveries (1,500 movements) will deliver freight to the construction site. These vehicle movements are simply not viable given the wider road network. It is very hard to imagine that there will not be regular and significant delays at many points south of the SLR.

Again, EDF state that 85% of HGV traffic will approach from the south. These HGV's will travel north on the A12 past Saxmundham and turn off to the east on the proposed Sizewell Link Road Z (SLR Z). The A12 north of the two villages by-pass is already under pressure at peak times. The Saxmundham / Rendham junction of the A12 is already very dangerous and it is hard to imagine that these proposals will provide a satisfactory access solution give these existing pressures and the dependence on these existing roads.

The SLR has the same impacts in terms of noise and disturbance

We have expanded on these points and the impact of this scheme on farms along the route of the Sizewell Link Road in the Response of the Middleton and Theberton Landowners.

We reject EDF's current proposals for a road led scheme which is not appropriate scheme for this higher level of traffic movements. We echo the view of District and County Council in requesting SLR Route W north (formerly D2) to be investigated as a more viable alternative access route to the construction site.

We also occupy land under the proposed Route of SLR W north as well as TBP and the SLR Z. They have concluded, given the wider mitigations offered by route W north, as well as the potential to mitigate the impact of the W route on the farming outputs, that this their preferable option.

In summary the true impacts of both rail-led strategy and the road-led strategy have yet to be acknowledged let alone assessed.

## **6. Legacy**

EDF propose the retention of both SLR and TB and claim that this would be a legacy benefit for local communities. This cannot and should not be accepted.

There is no need for the retention of these new roads. The current B1122 is adequate for its purpose. It is a rural road with flows well within its capacity and is likely to remain so. There is no identified need for bypasses or the like either now or in the future in the no-scheme world. This accepted by EDF.

SCC as highway authority also see no need for these improvements in the no-scheme world and do not contemplate their adoption. This is a sensible response when the existing B1122 will remain on line and usable. The access road after the construction period will be merely duplicating existing capacity and therefore an unnecessary burden on the environment.

The only sustainable response would be to require EDF to remove the road after the end of its use as a haul route and restore the land to its former condition and use. EDF should assess the route accordingly.

## **7. Concurrent Schemes**

We believe that the risk to Suffolk posed by Sizewell C is compounded by the fact that there are other schemes running concurrently in the local area. The combined effect of them all threatens to alter the character and fabric of this area beyond recognition.

Projects of this size in the relative proximity to each other as here should never be considered in isolation.

The fact that this isolationism is taking place is clearly demonstrated by EDF's proposal of Route Z – this is the one route that cannot benefit either of the other 2 projects.

The planning process must consider the combined effects of these projects.

## **8. Heritage**

Please see appendix 1, Heritage Assessment, The Proposed Sizewell Link Road, Theberton Bypass and Yoxford Roundabout, Suffolk.

## **9. Environment**

We echo the concerns set out by the RSPB as to the environmental impact that a project of this scale and positioning will have. We are also very aware of the levels of protections in place for specific habitats in this area and the fragility of their existence. To speak about suitable mitigation measures seems rather flippant in this context and this concern is only increased when considered alongside the response from the AONB Partnership – namely that “the consultation and associated documents do not pay proper regard for the purposes of the AONB” and that “the development would cause significant harm to the nationally designated AONB”.

The permanent loss of 5.5ha of SSSI around the construction site is a very clear and definable detrimental impact of the construction of Sizewell C. This alone should not be allowed. Other losses are currently unquantifiable, which in itself is very concerning, demonstrating the inadequacies of the PEIR, but these must be considered before the process of construction can be continued.

We also believe that the Suffolk Wildlife Trust have a very pertinent point in expressing grave concern around the fact that a great deal of detail has been missed out at this stage with the plan being for it to be presented as part of the Environmental Statement in the DCO application. The main cause for concern around this approach is that Consultation Stage 3 is almost unrecognisable from Stage 2 in a number of areas and so if there is the same leap between now and the DCO application, will interrogation of the data presented be possible in the timescales allowed at that point?

## **10. Tourism**

We have grave concerns around the effect that this scale of project will have on one of the major economies of our local area – tourism. Given all that EDF have disclosed about vastly increased vehicle movements in the area, working hours, construction noise and the projected amount of time that all of the disruption will be present for, it is entirely naïve to think that it won't have a huge detrimental impact on the tourism in Suffolk.

The proximity of Sizewell to key tourism hotspots like Aldeburgh, Thorpeness, Minsmere and Southwold will only serve to compound the problem, but tourism further afield will still be affected. When people come to Suffolk, they come for the variety of attractions that the county has to offer from attractive market towns and cultural centres to the great walks, cycle routes and nature reserves and the coast. To be able see all of these things during a weeks break, tourists need to be able to move around the county and not spend their days in endless lorry queues. The heightened volumes of traffic on the A14 and A12 are also extremely worrying as constant congestion will discourage people from even attempting the journey to our county.

In addition to the above obvious disruptors to tourism, there is the question of accommodation for tourists. EDF acknowledge that workers may seek to rent some of the holiday home properties available locally – this could provide welcome winter trade for the home owners, but it is indisputable that this will have a negative effect on the wider local economy as the spending patterns of the workers will be very different to that of holidaymakers.

**From:** [SizewellC](#)  
**To:** [India Bacon](#)  
**Cc:** [SizewellC](#)  
**Subject:** RE: Stage 4 response  
**Date:** 14 November 2019 13:00:07  
**Attachments:** [image001.png](#)

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Dear India Bacon

## **Planning Act 2008 (as amended)**

### **Proposed application by NNB Nuclear Generation (SZC) Limited (EDF Energy2) for an Order Granting Development Consent for a new nuclear power station development at Sizewell in Suffolk (Sizewell C)**

I am writing regarding your correspondence sent to the Planning Inspectorate (the Inspectorate) dated 27 September 2019 in relation to the above proposals.

The proposed application is at the Pre-application stage of the Planning Act 2008 process. Further information about the process can be found in the link below to the National Infrastructure Planning website: <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>. The Applicant is expecting to submit the application in Q1 2020.

As the application has not yet been formally submitted to the Inspectorate your first point of contact should be the Applicant and we would encourage you to contact them directly by email to - [Sizewell@edfconsultation.info](mailto:Sizewell@edfconsultation.info). It is important that the Applicant is made aware of your comments at the Pre-application stage of the process to enable them to consider these points before finalising their proposals and submitting the application to the Inspectorate. Please note the Applicant's Stage 4 Consultation closed on 27 September 2019.

The Inspectorate is unable to consider your comments at this time however please note that, should the application be received and accepted by the Inspectorate for Examination, the National Infrastructure Planning website will be updated accordingly and you may submit comments to us at that time: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/sizewell-c-new-nuclear-power-station/>

If you have concerns about the Applicant's pre-application consultation you should contact the Applicant in the first instance to enable them to address the issues ([info@sizewellc.co.uk](mailto:info@sizewellc.co.uk)).

If you have contacted the Applicant but you are not satisfied that the Applicant has, or will, take account of your comments you can make your comments to the relevant local authority. The local authority can consider them as part of their Adequacy of Consultation Representation submission to the Planning Inspectorate (on behalf of the Secretary of State) at the application stage of the process. Further information about Community Consultation can be found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/General/General-Advice-00632-1-170702%20s47%20Community%20Consultation%20FAQ.pdf>

The Planning Inspectorate has published a series of Advice Notes about the Planning Act 2008 process. 'Advice Note Eight: Overview of the nationally significant infrastructure planning process for members of the public and others' can be found here: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

I hope you find this information to be helpful.

Yours sincerely

Dean Alford  
Case Officer

