



Objection to planning application

DC/19/1637/FUL

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Theberton and Eastbridge Action Group on Sizewell (TEAGS) is a community organisation that represents the communities of Theberton and Eastbridge, and seeks to minimise the impact of the Sizewell C project on these communities, including the local environment, the local economy and transportation. TEAGS has a number of concerns and objections relating to planning application DC/19/1637/FUL, proposing the relocation of Sizewell B facilities.

Summary: TEAGS believes that this application should only be considered as part of the forthcoming Sizewell C Development Consent Order (DCO) procedure, and not decided by the District Council as Local planning Authority, for the following reasons, which we expand upon below:

- The primary purpose for relocating Sizewell B facilities is to make space for Sizewell C. It would be inappropriate to approve a development that would remove around 90% of Coronation Wood and up to 50% of Pill Box Field when the DCO request for Sizewell C has neither been submitted nor approved, and when the National Policy Statement on site selection for new nuclear reactors is under review.
- The cumulative impact of this proposal and other energy-related infrastructure in the area is expected to be considerable, with an enormous adverse impact on the AONB, natural history, the visitor economy, local communities and the traffic and transport infrastructure. Suffolk County Council and the former Suffolk Coastal District Council have worked hard to ensure these projects are designated as Nationally Significant Infrastructure Projects, and given the interconnectedness of EDF's plans to relocate Sizewell B facilities to facilitate its Sizewell C proposals, we consider it is inappropriate to exclude this part of the project from the NSIP / DCO process. EDF included this project in its Stage 3 Consultation and by inference we would expect it to be included in its DCO application. This is the appropriate course of action and we do not consider this separate application to the LPA is justifiable.
- In the event of Sizewell C not going ahead, it would be unacceptable for landscape to have been destroyed for no reason. We maintain that EDF should be able to upgrade its facilities without destroying the landscape.
- With the interconnectedness of this project with Sizewell C, it is ironic that EDF is seeking permission from East Suffolk Council when the County Council and former District Council - major statutory consultees - are withholding their support for Sizewell C.

1. The Sizewell B development proposals should only be considered as part of the EDF DCO procedure for Sizewell C.

In its *Environmental Statement – Non-Technical Summary* EDF states that it is preparing a DCO application to build a new nuclear power station at Sizewell. EDF has proposed a nominated site boundary within which to construct and operate Sizewell C to the north of the existing Sizewell B station. However, there are a number of facilities associated with Sizewell B which are currently located within this area of land. The planning application for the Proposed Development is seeking permission to relocate existing Sizewell B facilities from within this area of land, as well as providing upgraded facilities to comply with current standards and regulations. In applying for these proposed works through a planning application to East Suffolk District Council, EDF argues that this will facilitate the Government's policy objective of more rapid development of new nuclear power, by ensuring earlier delivery of Sizewell C, than if the relocation proposals were only included as part of EDF's application for development consent. It further states that this is in line with the approach advocated in the Department for Communities and Local Government's letter to local authorities, dated 16 July 2009, in relation to the new consenting process for Nationally Significant Infrastructure Projects. TEAGS rejects EDF's argument for submitting this application to East Suffolk Council at a time when the project does not have Development Consent Order approval.

TEAGS understands that National Policy Statement EN-6 dated July 2011 is the primary decision-making document for the IPC when considering development consent applications for the construction of new nuclear power stations on sites in England and Wales. However, Part 4 of this NPS lists the sites that the Government has assessed to be potentially suitable for such development and which must be connected to the National Grid and generating before the end of 2025.

Sizewell is a site identified as potentially suitable for the deployment of a new nuclear power station before the end of 2025. However, this designation does not approve or confer any particular configuration or number of reactors that would be considered as suitable.

EN-6 also considers that a single power station would be expected to require approximately 30 hectares of available land. Currently the SZC proposal for two reactors is based on a 32 hectare plot, after the Sizewell B facilities have been moved.

Despite the possible removal of Sizewell B facilities, there are still significant concerns that the hard sea defences are incomplete and not extensive enough. There is insufficient available space within the platform to connect the turbines to the grid through underground galleries. As a result, tall overhead pylons have been introduced which are considered to be inappropriate for the setting within the Heritage Coast and Suffolk Coast & Heaths AONB. TEAGS is not alone in expressing concerns that a dual reactor development is simply too big for the proposed space, and perhaps the site should be limited to a single reactor development. Should this conclusion be reached by the Planning Inspectorate and Secretary of State then removal of Sizewell B facilities may well be unnecessary and landscape destroyed needlessly. (As stated above, we consider that it should be possible for EDF to upgrade its facilities without taking more AONB land.)

In December 2017 the Government published a Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a National Policy Statement for Nuclear Power between 2026-2035. This begins the process towards designating a new National Policy Statement ("the new NPS") applicable to nuclear plants expected to be deployed after 2025. This consultation must

include Sizewell C because the power station, should it receive development consent, will not be commissioned before the end of 2025.

For these reasons TEAGS argues that it is not appropriate for the proposed redevelopment of Sizewell B infrastructure to be considered by the Local Planning Authority (East Suffolk District Council). The construction of Sizewell C, in its presently proposed dual reactor configuration, is dependent on the completion of the currently proposed Sizewell B development and would have significant planning implications (environment, traffic, damage to the visitor economy and the AONB). TEAGS argues strongly that the current development proposal should form part of the DCO process for Sizewell C, should Sizewell remain a 'potential' site following the Government's review of nuclear policy.

Moreover until the new NPS is in place and Sizewell C has been properly assessed against new criteria as well as the latest habitat regulations and Sea Level/Climate Data, then Sizewell C may not meet those requirements. Therefore, any preparatory work should be postponed until such time as these new assessments and regulations are in place and Sizewell has been added to the potential site list within the new NPS, and the new legislation has been approved by parliament. This requires a further BEIS consultation which we are awaiting, and the new NPS is not expected to come before parliament until 2020 .

2. Impact on the surrounding area, the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and on the visitor economy.

TEAGS objects to the application because the proposed development will result in the loss of further natural landscape and habitat and impact on the AONB, including the loss of Coronation Wood and the Pillbox Field near to Sizewell village; both significant elements of a the local landscape AONB already hugely scarred by the Sizewell nuclear facility.

EDF admits in its application that the initial loss of Coronation Wood impact would be of 'high magnitude' and that it would have a significant effect at the local level. EDF argues that once the planting proposed as part of the landscape design has established, over time this will reduce the impact to medium with a 'minor adverse, but not significant effect'. Despite EDF's argument it is notable that Suffolk Wildlife Trust remains concerned about the loss of Coronation Wood and the impacts on an area of grassland in Pillbox Field, and also an area of species-rich marshy grassland located between two sections of the Sizewell Marshes SSSI.

TEAGS regards this as further representation of the enormous scale of the proposed Sizewell C project; for two new nuclear reactors on a site that too small to accommodate a development of the scale proposed.

When looked at in conjunction with the various Wind Farm and Interconnector projects, the industrialisation of the area immediately surrounding Leiston and all the implications of this for its residents and the tourist industry between Aldeburgh and Southwold are additionally of considerable concern.

The cumulative impact of this and the other major developments listed in the application Long List of Cumulative Schemes would have an enormous impact on the landscape of the area, on local communities and on the environment generally. This is further reason why the development

proposal should be considered as part of the EDF Sizewell C DCO submission and not as a stand-alone development for the LPA to determine.

TEAGS believes that the cumulative impact of the proposed strategic energy associated developments in the Sizewell area would substantially damage the £250m local tourism industry, 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.

TEAGS also supports the RSPB's suggestion that the following information be included in the Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EclA).

- Up to date protected species surveys for the entire EIA Scoping area
- The potential impact of runoff and drainage contamination / pollution to groundwater, adjacent habitats, ditch systems and statutory protected sites should be investigated by the EIA/EclA and appropriate mitigation measures incorporated into design, construction and site operation. Where possible, existing features that intercept runoff should be retained as part of buffer strips.
- A Phase 1 / Extended Phase 1 Habitat Survey should be undertaken for the entire EIA Scoping Area and surrounds to advise the EclA and EIA. Existing conservation features should be retained where possible and such features should be incorporated into the proposed buffer area for the Sizewell Marshes SSSI.
- The impacts of light spillage and noise disturbance on wildlife should be included within the EclA and EIA alongside suitable mitigation.
- Clarification on proposals for land take from the Sizewell Marshes SSSI.

3. Transport.

The Proposed Development is estimated to generate during the peak construction period a total of 70 Heavy Goods Vehicles (HGV) trips (140 movements) per day. The proposed construction traffic route will access the Site from A12 via the B1122, through small villages, including Middleton Moor and Theberton, and also Yoxford.

TEAGS is very concerned about the impact of the additional traffic on local roads during the construction period of 53 months, in particular the use of the B1122. An additional 140 lorry movements a day for the peak construction period would place additional burden on local roads and village communities, especially the inadequate B1122, and possibly add to the enormous number of vehicles using local roads during the start of the 10 - 12 year Sizewell C construction period. Whilst EDF argues that starting work on Sizewell B facilities sooner may avoid too much overlap with the construction of Sizewell C, we still consider that the more significant risk is the needless destruction of landscape, should Sizewell C not go ahead, or only go ahead on a smaller scale.

With Sizewell C clearly dependent on the release of parts of the application site, this project and the construction of Sizewell C cannot be separated. With the work likely to coincide with the start of Sizewell C construction, we request more information about how the traffic, worker influx and disruption associated with this project will overlap with and exacerbate impacts related to Sizewell C and other energy infrastructure projects proposed for the area. We are concerned that more detailed Environmental Impact Assessments are not yet available; we consider an EIA and Environmental Statement - to assess the cumulative impact of both projects - to be essential.

4. Public consultation.

TEAGS believes that it is unreasonable to expect local communities and representative groups to comment on individual projects without being able to assess the cumulative impacts of projects that will be implemented at the same time, and by the same or related developers. Although this project was also included in the Sizewell C Stage 3 consultation documents, the separate public consultation on Sizewell B facilities was short and ran concurrently at the beginning of the consultation on Sizewell C, thereby being overshadowed by the larger project.

5. Safeguards should the development proceed.

TEAGS wishes to seek assurance from the LPA that the safeguarding measures proposed by EDF will be embodied in planning conditions and/or a planning legal agreement should permission be granted. These would be implemented to minimise environmental effects during demolition and construction of the proposed development and include:

- Implementation of a Construction Environmental Management Plan (CEMP) and adherence to the CEMP throughout demolition and construction. The CEMP will set out key environmental risks related to the demolition and construction works, measures to mitigate and manage these risks, construction environmental targets and a monitoring and inspection programme. An Outline CEMP has been prepared and submitted with the planning application.
- Establishing a process for handling all enquiries including complaints. All enquiries, whether a query or a complaint, will be dealt with in a timely manner and the interested party will be notified of what action is being taken to address the enquiry/complaint.
- Preparation of a Construction Traffic Management Plan and Construction Workforce Travel Plan to minimise adverse effects of construction traffic.
- Preparation of a Site Waste Management Plan (SWMP) to minimise the generation of demolition and construction waste. An Outline Construction Waste Management Strategy has been prepared and submitted with the planning application which sets out the requirements for the contractors' SWMP.