



Waldringfield

Parish Council

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Sizewell C Stage 4 Consultation Response by Waldringfield Parish Council

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Waldringfield Parish Council **OBJECTS** to the Sizewell C planning application for the following reasons:

Overview

The public's views on EDF Energy's proposals to build a new nuclear power station should be part of a debate on national energy policy, but this is not covered in the consultation questionnaire, which is confined to local issues around the construction phase, with some long term legacy implications. Waldringfield Parish Council (WPC) has therefore mainly limited its comments to these issues.

This hasn't stopped EDF from presenting a biased and highly debatable section on "Decarbonisation and the need for new nuclear capacity" (§1.3¹), which contains many dubious claims. For example it claims that nuclear power provides "value for money for end users" (§1.3.2) and will "meet the UK's decarbonisation and security of supply objectives while minimising costs to consumers" (§1.3.5). However the strike price that consumers will pay for electricity generated at Hinckley Point is guaranteed to be £92.50/MWh (in 2012 prices), adjusted for inflation, over the 35 year tariff period – at least twice the current market price (recently, prices for new wind power delivered by 2025 were set at £40/MWh²). The cost of electricity from Sizewell C is likely to be similar. This is at a time when electricity prices are falling rapidly, mainly due to the plummeting cost of solar PV and wind generation.

Sizewell is the only nuclear power plant in the UK located in an environmentally protected site, i.e. Suffolk Coast & Heaths AONB, but insufficient regard has been taken of the AONB's special qualities. The proposals must recognise that the Suffolk Coast and Heaths AONB is a national and not merely a local Planning Designation. It is also adjacent to nationally and internationally designated conservation areas.

¹ Unless otherwise stated all references are to the *Stage 4 Pre Application Consultation*

² "Hinkley Point C nuclear plant to run £2.9bn over budget":
<https://www.bbc.co.uk/news/business-49823305>

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The project is enormous, far bigger than the existing Sizewell B plant – it is far too big for the setting and land available. It is in fact for two new reactors, not one – but it is very difficult to discern this from the publicity.

In addition to the 10 to 12 years of the construction phase, there will be in excess of 20 years of decommissioning at the end of the plant's life. This is barely mentioned in the documentation, but will cause massive disruption to local communities and the environment.

Environmental Impacts

Full regard should be taken of the "AONB Special Qualities" document (developed by EDF in consultation and agreement with the AONB Partnership, SCDC and SCC). Construction and operation of the plant therefore need to meet a higher level of environmental protection standards than for other nuclear power plants, which are not in protected areas. This is especially so given the proximity of two SSSIs and the Minsmere RSPB Reserve, which is an SPA and Ramsar site.

The consultation document says "Following the close of the Stage 4 consultation we will be finalising our EIA to identify the direct effects ... of the development and identify those measures necessary to control impacts" (§7.1.4). Without access to the full Environmental Impact Assessment how is the public supposed to comment on this extremely important aspect of the application? After the close of Stage 4 will be far too late.

The construction phase will last for 10 to 12 years. During this time the environmental impact will be devastating, there will be a severe and unacceptable loss and fragmentation of habitats, resulting in a reduction of biodiversity in one of the most biodiverse areas of the UK.

The Suffolk Coast & Heaths AONB will be cut in two, threatening to compromise the purposes of the AONB designation itself.

The water levels in both Sizewell Marsh and Minsmere Levels will be changed, and this will damage these fragile ecosystems.

The proposed 'town' for 2,400 workers will have a devastating impact on the nearby protected areas (the Minsmere Levels and the Sizewell Marsh SSSIs, and the Minsmere RSPB Reserve). The reason these sites are attractive to wildlife is their remoteness from people, houses, cars etc., and this will be seriously undermined by the new 'town' so close by.

Spoil heaps, up to the height of a 10-storey building, are likely to cause significant dust pollution to the AONB, Minsmere Levels and Sizewell Marsh.

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Construction noise and vibration will cause serious disturbance to wildlife.

The 'road-led' strategy will mean that construction traffic will cause far more pollution and carbon emissions than the more environmentally friendly marine led option, which has been rejected.

Light pollution during the construction phase is likely to cause disorientation to birds, particularly during the winter months.

Nuclear Waste

There is almost no mention of how the nuclear waste from the reactors will be stored, other than that it will be put in an 'interim store' (§2.3.10), and that this will be removed during decommissioning (p182). However, there is no indication of how long the decommissioning phase will take or what will be done with the waste at this stage.

Intermediate level waste will be kept onsite because there is no long-term nuclear waste facility available. No sites for secure, geological underground waste storage have been agreed and the Government has stated that "nuclear waste will not be forced on anyone", so none is likely to be agreed in the foreseeable future.

Transportation of the waste is not mentioned in the proposal, but in any case applications to transport nuclear waste through various counties have been refused – as, for example, in Somerset in relation to Hinckley Point.

The lifetime of the interim spent fuel store and the intermediate level waste it contains would: "under current assumptions, extend beyond the operational life and decommissioning of the other facilities on-site" (*Stage 3 Pre Application Consultation*, §7.2.23). This extremely hazardous waste will pose an environmental and security threat for decades, possibly centuries, into the future. It is grossly irresponsible to lumber future generations with the problems of looking after EDF's toxic garbage.

No information is provided about the far more dangerous and long-lived high level waste produced by the reactors.

Until secure, permanent sites for the disposal of spent nuclear fuel are identified and agreed, it is irresponsible to progress these plans. At the very least the plans should include confirmed details of how and where the waste from the existing plant when that is decommissioned, as well as the waste from the new plant, is to be transported and stored beyond the 'interim storage'.

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The Economy

Eyesores, noise, dust, and lorry traffic will deter visitors to the coast between Southwold and Aldeburgh, impacting tourism, which is worth £250m per year to the local economy. Most of this tourism is concentrated on the coast and within the AONB.

The Minsmere RSPB reserve attracts 125,000 people annually, supports over 100 jobs and is worth £3 million per year to the local economy. Many of these visitors will stay away during the 10-12 year construction phase, because of the noise and disruption, and it will take many years to entice them back.

Accommodation

There is a need for affordable housing in the area, and this is an opportunity to meet that need. The proposed temporary 'campus' next to Eastbridge will not provide for that need.

EDF has consistently refused to consider locating workers in urban areas with suitable social infrastructure and potential for legacy. It has failed to justify why it is not using its approach at Hinkley, where 500 workers are onsite and 1,000 in Bridgwater where the site has been laid out for new housing afterwards.

3-4 storey blocks with car parks and leisure facilities on a greenfield site will have an extremely damaging impact on local residents, particularly those in Eastbridge, Theberton and Minsmere.

Transport

In the Stage 2 and Stage 3 consultations, WPC and others argued that transport by rail and sea should be maximised, to reduce congestion on the roads. This has been ignored. Dropping the 'marine led' option is a massive mistake.

The addition of the 'Integrated' freight management strategy in Stage 4 does little to improve the basic problems, as all three strategies rely mainly on road transport, with different levels of rail support.

The three proposed strategies will result in 700, 1,000 and 1,150 HGV movements per day (rail-led, integrated and road-led respectively). These operations will be "potentially over extended hours" for the integrated and road-led options, and between 7am and 11pm for the rail-led option (*Table 3.2*). No indication is given of what 'extended hours' means, but it is clearly longer than 7am to 11pm (§3.6.15), and will occupy virtually all of most people's normal waking hours. This is completely unacceptable.

The route is a bad choice, it runs too close to many homes and listed buildings. It will be of little use once the power station is built. A proper Relief Road from the A12 south of Saxmundham would be a far better choice.

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The proposed two villages bypass still places an unfair burden on Yoxford and Middleton. The four villages bypass (Marlesford, Little Glemham, Stratford St Andrew and Farnham), as advocated by Suffolk Coastal District Council, Suffolk County Council and the Four Villages Bypass Group is a much better solution to the congestion on the A12.

Consultation Process

The questionnaire has no questions about emergency planning, fuel and waste storage, security or decommissioning, which are all extremely important issues.

There is little evidence that EDF has listened to the concerns of local people, councils or groups, as expressed in the previous consultation. It certainly hasn't listened to WPC's concerns.

There is very little mention of cumulative environmental, traffic, social and other impacts, and no assessment of the combined impact of overlapping Energy Projects (such as the East Anglia offshore wind farms).