

MIDDLETON-CUM-FORDLEY PARISH COUNCIL

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Electricity and RAB Strategy Team
Department for Business, Energy & Industrial Strategy
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Dear Sir/Madam

Response to BEIS consultation on a RAB model for new nuclear projects

The village of Middleton-cum-Fordley lies between the B1122, which crosses Middleton Moor on its way from Yoxford to Leiston, and the B1125, which connects Blythburgh with the B1122. Each of these roads is expected to be subject to profound additional traffic during the construction of the proposed new twin nuclear power station at Sizewell (SZC). As such, its residents, many of whom live within a few metres of the edge of these roads, will be heavily affected, while others will be subject to delays and frustration trying to join these roads when exiting the village.

Middleton cum Fordley Parish Council (Middleton PC) has robustly responded to each of the four EDF Energy Consultation Stages, lamenting the dire lack of information provided on a range of extremely important issues, effectively preventing meaningful conclusions from being reached – and making a mockery of meaningful consultation and engagement with local residents and stakeholders.. In addition to our conviction that the local roads do not have the capability of absorbing the envisaged traffic levels, their use will cause intolerable delays, disruption, greater risk of accidents and health issues from pollution upon the residents living on those routes. We also have considerable concern regarding other matters:

1. the destruction of natural habitat and effects on wildlife at Minsmere and areas designated AONB and SSSI;
2. the disfiguring of the area's beauty and tranquillity;
3. the effects upon the local tourist economy;

4. the disruption caused to, and by, the inevitable clash of agricultural vehicles with construction traffic;
5. the additional pressure likely to be imposed on health services, schools, policing and social services; and
6. the inadequate explanations concerning plans for monitoring water table levels and sea defences.

With so many significant concerns about EDF's proposed twin EPR reactor project at Sizewell C, the concept of a RAB financing model only exacerbates our concerns.

Problems with the Sizewell site:

In summary, Sizewell is readily acknowledged by the government¹ to be one of the two most environmentally sensitive sites in the National Policy Statement. It is too small for twin reactors - 32 hectares compared to 45 hectares at Hinkley Point C.

It lies wholly within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and adjacent to some of the most biodiverse habitats in the UK, including two Sites of Special Scientific Interest and the RSPB's Minsmere Reserve - an international RAMSAR site with European habitat designations.

The RSPB says "*Sizewell is not a suitable location for a new nuclear power station*" and that the project could be "*catastrophic for wildlife*".²

The Suffolk Heritage Coast, which would play host to Sizewell C, its spent fuel and waste for over a century, is an eroding coastline which is also slowly sinking, vulnerable to rising sea levels, increased frequency and intensity of storms and storm surges, with Flood Zone 3 land adjacent to the site.

Lack of infrastructure and the expected disbenefits in Suffolk:

Suffolk has poor infrastructure and fewer significant centres of population compared to Somerset. EDF says it is unable to build a jetty, meaning the local area will be subjected to well over 1,000 trucks a day at peak construction. EDF cannot recruit as many people locally in Suffolk as it can in Somerset, and so is having to provide beds for 3,000 workers - including a huge multi-storey campus for 2,400 on the edge of the hamlet of Eastbridge.

The company admits that the vast majority of jobs at Sizewell C will go to people from outside the area, and low unemployment in Suffolk means that those jobs that are taken by local people will likely be at the expense of important services such as social care.

The Suffolk Coast Destination Management Organisation has evidence that Suffolk's tourism economy will take a significant hit that would be difficult to recover from, and would vastly outweigh any other benefits to the local economy from SZC. The Suffolk County and East Suffolk District Councils, the two main statutory consultees, are still 'unpersuaded' that the benefits will outweigh the impacts. Middleton PC is firmly of the

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47800/1983-aos-site-report-sizewell-en6.pdf page 53

² www.rspb.org.uk/our-work/our-positions-and-casework/casework/cases/sizewell-c/ and www.rspb.org.uk/get-involved/campaigning/love-minsmere-sizewell-c/

opinion that the risks during construction of SZC to the local economy, way of life, safety, ecology and environment totally outweigh any risk of ‘the lights going out’ if SZC is not built.

Cost of Avoidance of Impacts:

The mitigation hierarchy for such enormous infrastructure projects is Avoidance, Mitigation, Compensation. As a Parish Council we believe that EDF has not done anywhere near enough to avoid the impacts that will be felt in the whole area, and neither are we satisfied that the proposed mitigation is sufficient.

The Government’s Nuclear Sector deal promises “*a lasting contribution to the communities that are host to nuclear facilities, both current and future*”³.

Yet EDF’s Simone Rossi’s statements to the media, about the expected cost savings to be made at Sizewell C⁴, raise concern that the need to make savings will take precedence over the need to construct Sizewell C in a way that avoids impacts on host communities. Measures that appear to have been abandoned, partly for cost reasons, include a marine-led transport strategy and a sensible rail-led transport strategy.

Conflict between appropriate plans and cost to the consumer:

With the cost of new nuclear ever rising, with EDF’s announcement that Hinkley Point C could cost an extra £3 billion and be a further 15 months late⁵, we are deeply concerned that the RAB model will provide yet another conflict between the regulator wishing to keep the RAB tariff which consumers would pay down, and ensuring that the budget for an already extremely expensive new nuclear project will include sufficient measures to avoid, mitigate or, if necessary, compensate its effects on local people. We refer back to the Nuclear Sector Deal, and are dismayed that there is no reference to communities in the RAB consultation document, nor mention of public benefit. These are significant omissions.

Value for money:

We note that new nuclear projects would not be granted a nuclear RAB licence unless they could be shown to offer value for money for consumers and taxpayers. Furthermore, an assessment would need to “take into account” the “wider benefits, specific to the project, which would influence a decision as to whether, on balance, proceeding was in the interests of consumers and taxpayers.”

Given that Hinkley Point C has been widely criticised for not offering value for money, we have concerns about, and lack confidence in, such an assessment.

The vulnerabilities of the RAB model to regulatory pressures:

The setting of a “fair” price seems to us a regulatory nightmare, relying on correct estimates of unknown future scenarios and costs that cannot be predicted - including the long-term management of waste and spent fuel. This regulatory process seems

³ <https://www.gov.uk/government/publications/nuclear-sector-deal/nuclear-sector-deal>

⁴ <https://www.bbc.co.uk/news/uk-england-suffolk-42721057>

⁵ <https://www.bbc.co.uk/news/business-49823305>

likely to become even more complex and controversial as the disparity between the cost of new nuclear and alternative energy sources - especially offshore winds - grows.

Opposition from consumers:

Middleton PC has received a strong message from the people of our village that they find the idea of paying for the privilege of major disruption and the threat of environmental damage to protected sites such as RSPB Minsmere totally unacceptable. Those that have chosen a renewable energy supplier tariff are additionally outraged. We note that there remain uncertainties around risk-sharing in the RAB model given the high likelihood - especially with EDF's poor record of delivering EPRs - of overruns and overspends. EDF are yet to complete building and commission an EPR anywhere. We are concerned that we will end up paying for EDF's incompetence.

In conclusion:

We consider that EDF's Sizewell C twin EPR project, is too inherently risky to be suitable for a RAB model. It is too expensive and impactful compared to other energy sources to ever be able to offer value for money, and EDF's track record of on-time, on-budget delivery is abysmal.

We acknowledge the co-operation and assistance of our neighbouring Parish, Theberton & Eastbridge, in the compilation of this response.

Yours faithfully

Sharon Smith
Clerk to Middleton cum Fordley Parish Council