

# MIDDLETON-CUM-FORDLEY PARISH COUNCIL

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## **Response to Sizewell C EIA Scoping Report: EN010012**

Dear Ms Boyle

Middleton-cum-Fordley Parish Council has considerable concern regarding both the timing and contents of the Sizewell C EIA Scoping Report EN010012:

- EDF is proffering a Scoping Report almost immediately after the close of the Stage 3 Consultation, with unsubstantiated Environmental Impact Assessments entirely based on those presented during that consultation.
- EDF will not have had time to consider the substantive responses to Stage 3 proposals, and by seeking a Scoping Opinion at this time, EDF is totally undermining the consultation process.
- If, as a result of the Stage 3 consultations, EDF amends its plans in the coming months, this Scoping Opinion would not stand, as EDF would need to assess the Environmental Impact on any new or revised plans.
- Consultees have been given very little time - less than a month - to respond to this lengthy document.

It would seem this Scoping Report was written concurrently with the drafting of the Stage 3 Consultation, as no account has been taken of the responses, questioning certain choices, by statutory authorities and others, such as:

- The proposed Sizewell Link Road and Theberton Bypass;
- Dropping the marine-led strategy;
- The introduction of tall pylons;
- Additional development within the AONB;
- Inappropriate mitigation to reduce delays in surrounding areas;
- Concerns about the impact on coastal processes;
- No evidence on steps to limit the impact of borrow pits and stock piles;
- No evidence to support location of the accommodation campus.

EDF has continuously stated its intention to be a good neighbour, but there is little or no evidence of the final stage of public consultation having been used to understand statutory consultees' and neighbours' concerns or to modify their plans. It appears that only expediency and efficiency as perceived by EDF are of importance.

The result of this is that, if amendments are subsequently found to be needed in the proposals, another stage of consultation and a further Scoping Report could and should be required.

There were significant changes in the Stage 3 Consultation:

- Removal of the jetty, thus abandoning seaborne delivery of bulk materials;
- The addition of road-led and rail-led transport alternative strategies;
- The Theberton Bypass and Sizewell Link Road.

EDF have dismissed the alternative Sizewell Relief Road routes, one of which was originally proposed during the Sizewell B construction proposal (then known as D2 , approximating to route W in Stage 3 consultation), citing engineering difficulties, which are not accepted by Suffolk County Council (SCC). The more southerly route of D2/W presents less difficulty and is far less invasive to properties than the EDF proposed route.

Indeed, SCC have concerns as to whether they would adopt the Sizewell Link Road as it would run parallel to the existing B1122. It thus offers little if any additional commercial capacity, and would represent a mindless and needless destruction of large swathes of the area. A relief road such as D2/W from South of Saxmundham to Leiston would be of significant future value, reducing use on the B1122 to the advantage of communities along that road, offering a shorter route from the South to Sizewell and Leiston Industrial areas and providing better access for the traffic to and from the various proposed wind-farm and continental interconnector substation sites in this area. EDF expressed uncertainty in the Stage 3 Consultation that Network Rail will be able to deliver the required changes to the rail infrastructure for either “option” within the timescale. These doubts must be resolved and presented to the public for consultation prior to any DCO Application.

We believe that these major changes should be further discussed with the statutory consultees and submitted to a fourth round of public consultation, after proposals acceptable to all the consultees are found. The responses to Stage 3 from local authorities and other statutory consultees do not support the proposals as currently presented.

This is especially so in the case of the joint SCC/SCDC submission, where they perceive the disadvantages of constructing SZC outweigh any future advantages. The responses from RSPB and the Environment Agency are both highly critical of the lack of specific solutions to the many important environmental and ecological issues raised, the EA going further in demanding that they be provided with EDF’s solutions, when drafted, before the DCO Application.

EN-6 and the new NPS also state that new single nuclear power station sites are expected to be in the region of 30 hectares, although it was cognisant that the exact size would depend on the specific design and configuration of the site. Currently the platform size for the proposed dual reactor development on the SZC site is only 32 hectares. Examination of the Stage 3 Consultation documents it has shown there are several issues with attempting to fit two reactors onto the envisaged platform:

- In earlier consultations, it was intended to connect the generating turbines to the National Grid substation via underground galleries. However, there is insufficient space to construct these galleries within the footprint of the site, resulting in four tall pylons being needed. These pylons are not in keeping with the Sizewell site being totally within the Suffolk Coast and Heaths AONB and on the foreshore of the Suffolk Heritage Coast
- The hard-coastal defence (HCD) currently proposed by EDF terminates just west of the existing sacrificial dune and 1metre above the Ordnance Datum (OD). As currently designed, the HCD is inadequate as its termination point leaves the defence liable to immediate erosion once exposed by low Spring tides.

It has been suggested that the whole platform should be moved back and increased in size to resolve these issues, but EDF have said in public on several occasions that they do not think this is possible. The land to the West of the proposed platform is all low -lying and within the Sizewell Marshes Site of Special Scientific Interest (SSSI). It consists of 10metre-deep peat deposits, so would have a very significant ecological and hydrological impact and a significant environmental challenge to the SSSI. In addition, it would require a significant increase in volumes of wet peat needing to be neutralised by burial in the borrow pits, causing long-term watercourse pollution and an additional engineering challenge to providing a stable platform.

Given all the above aspects, it is perhaps inappropriate to attempt to fit two reactors onto this very constrained site, and that if the development is to proceed, it should be limited to a single reactor. If such a conclusion is reached during any DCO application review, the need for the SZB facilities relocation, subject of a current inappropriate planning application, which could see the destruction of Coronation Wood and use of Pillbox Field, would be entirely unnecessary, as the existing SZB and proposed SZC site have enough space to accommodate a single reactor within the overall footprint.

In summary we feel this Scoping Report is premature. It should be postponed until all the Stage 3 consultation responses have been properly considered and discussed with statutory consultees, and suitable changes made. Time should be given for a final public consultation on a proposal that can be supported by the statutory consultees. Only then can a Scoping Report be drawn up and properly submitted to the Planning Inspectorate for an opinion to be returned.

Yours sincerely

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