



# Waldringfield Parish Council

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## Sizewell C Changes to DCO Plans Consultation Response by Waldringfield Parish Council 17/12/2020

Waldringfield Parish Council (WPC) **OBJECTS** to the Sizewell C planning application and to the proposed changes for the following reasons:

### Overview

None of the concerns we expressed in our Stage 4 consultation response have been fully addressed. Issues that we highlighted in our Stage 4 consultation response but that have not been addressed include:

- lack of a full Environmental Impact Assessment
- impact of noise, vibration and light pollution on wildlife
- nuclear waste
- impact on the local economy, particularly tourism
- failure to provide legacy infrastructure and affordable housing in the area

Issues that are mentioned in the *DCO Changes Consultation* document, but that we consider to be inadequately addressed are described below. We therefore consider that these proposals do not change our overall objection to or concerns about Sizewell C, so all our comments on the Stage 4 consultation are still relevant.

### Decarbonisation of the Energy Supply

Most of the claims made in §1.3 ("*Decarbonisation and the need for new nuclear capacity*") of the *DCO Changes Consultation* document are false or very dubious. Even on EDF's assumptions, Sizewell C cannot make a positive contribution to the UK's net zero target until 2040, assuming that it is finished on schedule, which is far from certain given the poor record of EPR builds. Even if all goes well, Sizewell C will not be completed before 2034, but there is a need for speedy action to address the current climate emergency which means we need sources of energy that we can deploy much more quickly, cheaply and reliably than nuclear mega-projects such as Sizewell C. Also, decommissioning is not included in EDF's CO<sub>2</sub> calculations for Sizewell C's greenhouse gas emissions.

## Environmental Impacts

The new compensatory fen meadow habitat at Pakenham in West Suffolk (§4.9) is, like the other two compensatory habitats at Benhall and Halesworth, miles away and does not adequately compensate for rare fen habitat loss in the Sizewell Marshes SSSI. Legally, compensatory habitats that are at least equivalent to those lost must be put in place **before** construction. However, the proposal is only for work to start at the **outset** of construction: *"Works to create the fen meadow habitat at Pakenham would be similar to those described in Volume 2, Chapter 3 of the ES in relation to Benhall and Halesworth, commencing at the outset of construction on the main development site"*. (§4.9.9).

## Transport

In the Stage 4 consultation, WPC and others argued that transport by rail and sea should be maximised, to reduce congestion on the roads, and that dropping the 'marine led' option was a massive mistake. We are pleased to see that the marine option has been resurrected, but are still concerned that this is not guaranteed.

As a result of including the 'marine led' option EDF estimate that the number of daily HGV movements will drop from 650 to 500 (typical day's peak) and 1,000 to 700 (busiest days) (Table 2.1). Whilst this is welcome it is still a very large volume of traffic. It is still the case that no assessment has been made of the impact of this traffic on the A12 around Martlesham, the Seven Hills A12/A14 junction or the Orwell Bridge, or of the combined increase due to the extra 2,000 dwellings at Brightwell Lakes and the Felixstowe Port expansion.

This reduction in HGV movements is dependent on the proportion of material moved by road, however: *"Even with unlimited rail and sea capacity, however, the volume of material moved by HGV is unlikely to be less than 40% of the total"* (§3.1.14). At what point in the process it will be established whether this is indeed possible and, if it is not possible, what other steps will be taken to reduce impact on the road system?

The Beach Landing Facility (BLF) is likely to only be operational between April and October. It is claimed that *"Whether the material is bought by sea in the summer or all year round, it still directly reduces the volume of material that it is necessary to transport by other means"* (§3.2.21), but this would necessitate stockpiling large amounts of material during the winter months. However, this is limited: *"bulk material can only be imported to site at the rate it can be accommodated within the stockpiles, the height of which are limited in the Application"* (§3.2.22). It is therefore likely that HGV movements will need to increase during the winter because the stockpiles are running low due to the BLF not being operational. Bad weather during the summer months could also result in larger numbers of HGV movements.

Moreover, the reduction in HGV movements due to the new proposals will not happen for the first two years, at least: *"The potential enhancements in rail and marine capacity would not be in place in time to significantly affect traffic volumes during the early years."* (Table 3.5). 'Early years' are defined as *"approximately two years from the start of construction until the opening of various facilities – particularly the two village bypass and the Sizewell link road."* (§3.1.4 footnote). So any delay in providing the two village bypass or the Sizewell link road would result in the 'early years' (during which there are higher HGV movements) extending even longer than two years.