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**Theberton and Eastbridge Parish Council Response to Sizewell C EIA Scoping Report: EN010012**

Theberton and Eastbridge Parish Council have a number of overall concerns about this submission from EDF Energy regarding the timing and contents of the Scoping Report (SR). We are perplexed that EDF should be presenting us with a further scoping report just weeks after completing its final Stage 3 of public consultation prior to an application for a Development Consent Order (DCO) early in 2020.

In their responses to EDF's recent Stage 3 consultation, statutory consultees such as the Environment Agency, county, district and parish councils, the major conservation bodies, community organisations and individual members of the public have been almost unanimous in their severe criticism of the lamentable quality and substance of the Preliminary Environmental Information (PEI).

Considering that this was the final stage of public consultation, there had been a clear expectation that the PEI would be a well developed draft of the Environmental Impact Assessment that EDF intended to present through its Environmental Statement (ES), within the DCO application, for review at the examination stage. We are very concerned that the scope for effective community engagement at the examination stage will be much more limited and that the potential for proper consideration of objections and alternatives, not properly considered in the Stage 3 consultation or addressed in this Scoping Report, will have been lost.

Throughout this extended process, including the 2013 Scoping Report, 2104 Scoping Report Opinion (SRO) and three stages of consultation, there has been little evidence that any account been taken of the Secretary of State's clear requirement in his SRO of May 2014 that much more detailed evidence was required on the impact of the development on the coast and the shoreline to the north and south of the development and on the ground water systems with the Minsmere Levels and the Sizewell Marshes. To date no real evidence has been provided to show that EDF truly understand the delicate and interconnected nature of the coast and flood plains inshore or the relationships between surface and ground water in this delicate designated landscape.

There are many references to mitigation within the scoping report and yet little evidence has been presented as to whether existing mitigation and compensation (Aldhurst Farm), already in place, is

performing or likely to perform the services being claimed. Showing *“likely effectiveness”* is a requirement in regulation 63 of the Conservation of Habitats and Species Regulations 2017.

Throughout the three stages of consultation and embedded within this SR are many promises of work in progress, studies to be done and non-specific *“embedded mitigation”*. The reality is that very little of this information has come to light in the PEI presented at Stage 3 Consultation and the additions and changes that are contained within this updated SR will never be presented to the public in a consultation. EDF have stated that they intend to move directly to DCO with its associated ES. With such a tight timescale and such a huge workload outstanding we are concerned that even the ES will be subject to updates as any examination progresses, a process that will total disenfranchise the local Parishes and residents within the project zone to be able to respond and have their voices heard.

This Scoping Report whilst tackling some of EDF’s new proposals leave little confidence, based on performance so far, that EDF are serious about tackling these issues and placing resolutions or mitigations before the public or statutory consultees in an acceptable fashion.

In EDF’s Stage 3 consultation material there are major amendments to its earlier Stages 1 and 2 proposals. The decision to abandon any plans to construct a jetty, and, in consequence to present two options for rail-led and road-led transport proposals including bypasses and other road changes.

However, it would appear that this Scoping Report was written at precisely the same time as the Stage 3 Consultation was being drafted and it is clear that no account has been taken of the responses even where statutory authorities have questioned choices, such as the route of the proposed Sizewell Link Road and Theberton Bypass.

Indeed, EDF on 12 June circulated an update to Parish Councils *“We are currently reviewing all the responses received and will be updating local residents and communities on our next steps for the project within a few weeks. We will feedback to parish, district and county council representatives on the Stage 3 feedback at the Sizewell C Community Forum...”* At time of writing, a date for the next Community Forum has not yet been communicated.

Far from using the Stage 3 public consultation responses from statutory consultees, the conservation bodies, community organisations and individual members of the public to understand and potentially modify the significantly changed plans, EDF have pre-empted the outcome of the Stage 3 Consultation by creating a Scoping Report based entirely on their views prior to the Stage 3 consultation. This attempt to push their own view of the Sizewell C (SZC) project despite the lack of meaningful PEI information totally undermines the consultation process.

The consequence of this approach is that should further changes be needed in the proposals, this Scoping Report would not stand, and a new Scoping Report and Opinion would be required.

Major changes have appeared in the Stage 3 Consultation, removal of the jetty, addition of road-led and rail-led transport strategies, Theberton Bypass and Sizewell Link Road. Also, EDF have rejected alternative Sizewell Relief Road routes, at least one of which was proposed during the Sizewell B construction known as D2. A similar, but slightly different, route W has been considered in the Stage 3 consultation and rejected, in a somewhat cursory manner, citing *“difficult engineering”*, and a claim that has been met with some disbelief.

No in-depth assessment has been undertaken on EDFs Link Road/Theberton Bypass route (Z) or EDF route W or the old Sizewell B route, D2, and the Joint Local Authorities Group (JLAG), comprising Suffolk County Council (SCC) and Suffolk Coastal District Council, now East Suffolk Council (ESC), have requested that a full assessment is done of these routes prior to any decision being made.

However, examining route Z proposal and W or D2 the contrasts and impacts could not be starker:

- Route Z starts at 40 metre elevation crosses the rail line at about 35 metres and then crosses Fordley Road and its river which is at an elevation of 11 metres. The land immediately rises to 15 metres and then 21 metres close to Trust Farm. The land then drops to 8 metres at Wash Lane and rises to 15 metres at Plumtreehills Covert and crossing Pretty Lane at 20 metres before crossing the Theberton Brook and slowly dropping in elevation to 14 metres at Moat Road and 11 metres joining the existing B1122 close to Theberton House.
  - Section 3.7.4 specifies that *“Where the link road crosses existing watercourses, typically on low embankments, new crossings would be built, sized to maintain the existing flows of surface water as well as to maintain ecological connectivity.”* However, considering the landform at both Fordley Road/watercourse and Wash Lane/watercourse, to achieve such a result, significant cuttings and/or a much higher embankment will be necessary to achieve the appropriate road gradients.
  - A total of four watercourses are crossed in this plan.
  - This proposed road from the crossing of the railway line to its junction with the B1125 at Reckford Road will be plainly visible from across the Minsmere Valley to Westleton Common and Westleton Walks severely degrading the views from the AONB and RSPB Minsmere to the South West. It would also potentially be visible from Leiston Abbey at its junction with the existing B1122
  - There are a significant number of dwellings and more listed buildings close to this proposed route (30-40) than for route W or D2
- Within the Stage 3 Consultation documents, the route W proposal has had its start point pushed north towards Saxmundham, compared to D2, leaving the A12 at a point that would interfere with the ESC’s Local Plan for housing development. However, if the junction with the A12 was brought back towards the B1121 junction with the A12, as proposed in the D2 route, the elevation of the road at the leaving point would be at approximately 25 metres. The railway at this point is in a cutting and the existing B1121 crosses the railway with a rise from the A12 of a few metres. A similar rise would be necessary for a bridge to cross the railway on a diagonal further to cross The Saxmundham Layers and B1121 north of the B1121 road junction for Sternfield and cross the River Fromus which is at an elevation of 8 metres. The valley rises to 22 metres and the route will then cross undulating land between 15 and 20 metres, crossing the old Theberton airfield before joining the B1122 at 11 metres, as for route Z.
  - The only river/watercourse crossing is the Fromus and the valley is relatively wide compared to those being considered for route Z requiring less embankments or cuttings to achieve appropriate road gradients
  - There is significant tree planting already in the Fromus valley to provide screening for both Hurts Hall and Saxmundham
  - The rest of the route has no viewpoints from within the AONB or other protected sites until it joins the B1122 close to Theberton House when it may be visible from Leiston Abbey as is also the case for route Z

- This route has far fewer impacts on dwellings (<10) along the route compared to route Z

We note that SCC, as part of the JLAG response to the Stage 3 consultation (paragraphs 726-774), were pleased that EDF have considered a Sizewell Relief Road, they argue that the most beneficial route, both from reducing journey times for HGVs travelling from the South, for legacy and reducing impact from the Scottish Power Wind Farm NSIPs the slightly more southerly version of route W (route D2) should be examined much more closely. They also criticise EDF for indicating their route W was effectively the D2 route proposed for Sizewell B, which it isn't, especially when the connection to the A12 is concerned and the issue that is raised with the ESC's Local Plan.

SCC also note that whilst they may be happy to adopt the Theberton bypass part of the EDF proposal, they have significant concerns as to whether they would adopt the Sizewell Link Road as it runs parallel to the existing B1122 and offers little, if any, additional commercial capacity, whereas a relief road such as D2 from South of Saxmundham to Leiston would have significant legacy value, reducing the use of the B1122 and offering a shorter route from the South to Sizewell A, B and C, Leiston Industrial areas, as well as providing improved infrastructure for the various proposed wind-farm and continental interconnector substation sites that are proposed for this area.

EDF are still uncertain in their Stage 3 Consultation whether Network Rail will be able to deliver the required changes to the rail infrastructure for either "option" and in what timescale, which will influence the choice of transport options and potentially the length of time that high volumes of HGV and other traffic would use existing roads.

It is our belief that the introduction of these major changes to the proposal should be properly assessed and discussed with the various statutory consultees and submitted to a further round of public consultation once an updated project plan has been discussed with statutory consultees.

The responses at Stage 3 from SCC, ESC and other statutory consultees currently do not support the proposals as presented at Stage 3.

We are concerned that once again, alternative sites are not being considered for this development (para. 4.1.3) both in terms of alternative, less environmentally sensitive sites also on EN-6 site list (EN-6 Annexe C) are available and should be considered prior to Sizewell. We note that where alternative solutions exist, Imperative Reasons of Overriding Public Interest ("IROPI") do not transfer to project level and that para. 2.44 makes it clear that the nomination of eight sites (within EN-6) enables the refusal of consent for an individual site, should it be appropriate to do so.

Also, from the point of view that the EDF proposal for a dual nuclear power station at this site is too big and the site can only really accommodate a single nuclear power station. Inclusion on the EN-6 sites list confers no acknowledgement that any individual project proposal will be appropriate for the site in question, and that as further project information is available the site may be considered inappropriate or unsuitable for a site and potentially be subject to refusal, as above.

EN-6 and the proposed new NPS state that new single nuclear power station sites would be expected to be in the region of 30 hectares in size, 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 once relocation of some Sizewell B (SZB) facilities is complete.

During examination of the Stage 3 Consultation documents it has become apparent that there are several issues in attempting to fit two reactors onto this small platform;

- In previous consultations, the intention was to connect the generating turbines to the National Grid substation via underground galleries. However, we now know that there is insufficient space to construct these galleries within the footprint of the site and as a result three tall pylons have had to be introduced to facilitate these connections. These pylons are not in keeping with Sizewell 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 1 metre above the Ordnance Datum (OD). For the HCD to be effective, it should terminate **below** Mean Low Spring Tides which at Sizewell are in the region of 2 metres below OD. As currently designed, the HCD is inadequate as its termination point 1 metre above OD leaves the defence liable to immediate erosion once exposed

There have been suggestions that the whole platform 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) and consists of 10-metre-deep peat deposits, so would have a very significant ecological and hydrological impact and provide a significant environmental challenge to the SSSI. Also, there would be a significant increase in volumes of wet peat that would need to be neutralised and buried in the borrow pits providing a long-term watercourse pollution source and an additional engineering challenge to provide a stable power station platform.

At Stage 3 additional land take within the AONB have been proposed for permanent structures to the north of the platform on Goose Hill and to the south of the site in Pillbox Field, all of which is within the AONB and some of which is SSSI.

Lastly, as a Parish that has RSPB Minsmere as its immediate neighbour and a number of our local businesses rely on the tourism that results from visitors to the internationally acclaimed nature reserve, we whole heartedly support the points and objections made by the RSPB in their "*Annex – The RSPB's Detailed Comments on the Sizewell C Scoping Report*" (attached below) and request that they are taken as the view of the Theberton and Eastbridge Parish Council also.

Given all the above, we consider that the proposal to fit two reactors onto this very constrained and environmentally sensitive site is inappropriate and that any development should be limited to a single reactor. We await the publication of the new NPS consultation (to extend EN-6) along with its sites list and sustainability assessments and will respond with such a view.

Should such a conclusion be reached, this Scoping Report and it's 2014 predecessor would have to be completely re-worked and the entire construction site and associated developments would need downscaling and be subject to further consultation.

The haste that is being applied to this SZC project by EDF to get pre-works going through Sizewell B facilities relocation via a local authority planning application (DC/19/1637/FUL) and this premature Scoping Report, ignoring any assessment of the Stage 3 consultation response, is an indication of EDF's dismissive attitude to residents and consultees.

In summary we believe that this Scoping Report is premature. It should be postponed and only considered once all the Stage 3 consultation responses have been properly considered, discussed with statutory consultees.

## **Annex – The RSPB’s Detailed Comments on the Sizewell C Scoping Report**

### **1. Embedded mitigation**

Several references are made to “embedded mitigation” within the scoping report (e.g. para. 6.7.26). We commented on this in our response to the stage 3 consultation:

*“This is used to refer to measures such as the creation of a new marsh harrier foraging area as mitigation for loss of foraging resource due to noise disturbance. In line with the recent “People Over Wind” judgment, when mitigation is considered in the context of the Habitats Regulations Assessment, it will be necessary to first conclude that a likely significant effect exists before mitigation can be considered as part of the appropriate assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017.”*

### **2. National policy and regulatory context**

#### **2.1 Consideration of alternatives**

Para. 4.1.3 states that alternative sites for the proposed development will not be considered as part of this EIA. As stated in our response to the stage 3 consultation, we consider that there is a need to discuss development site selection given the failure to progress other potential development sites which were identified in NPS EN-6 and assessed as potentially having lower impacts on nature conservation than Sizewell C (see Annex C of NPS EN-6). The stage 3 consultation materials stated that Annex C of NPS EN-6 justifies the acceptability of impacts from Sizewell C in the light of the scarcity of alternative development sites available. Currently, alternative development sites that are potentially suitable are available and it is therefore our view that the acceptability of bringing forward a site with potentially significant impacts on nature conservation before sites that may be less damaging should be examined. We therefore do not agree at this stage that the argument for no alternative development sites (scoping report para. 4.1.3) made in the 3 consultation materials (and based on NPS EN-6 para. C.8.57) is applicable given the current situation.

In addition, NPS EN-6 para. 1.8.4 states in relation to the Conservation of Habitats and Species Regulations 2017 (“the Habitat Regulations”) requirements, following consideration of whether there are any alternative solutions, Imperative Reasons of Overriding Public Interest (“IROPI”) do not transfer to project level and that para. 2.44 makes it clear that the nomination of eight sites enables the refusal of consent for an individual site, should it be appropriate to do so. We therefore consider that to justify the development of the Sizewell site in advance of (or without) the alternative nominated sites or any other alternative solutions, it must be demonstrated that Sizewell C would have the least damaging impact on the Natura 2000 network of the available options. This again emphasises the need for provision of timely, robust and comprehensive evidence to underpin the assessment of impacts to comply with both the EIA and Habitat Regulations requirements.

#### **2.2 Permits and licences**

All information provided through the environmental permitting and marine licencing processes should be made available for consideration at the examination.

### 3. Environmental statement

The Environmental Statement (ES) submitted with the DCO application should be complete and assessed thoroughly by PINS against benchmarks for quality of application. The application should not be reliant on significant updates being provided once in the examination. All impacts on nature conservation interests should be fully described, assessed and the significance of impacts clearly explained in the ES. All impacts predicted should include fully worked up possible mitigation in the ES. Monitoring should be employed to verify predictions and identify any unexpected impacts. It should not be used to defer consideration of mitigation until after the examination.

### 4. Impacts on designated sites and Minsmere

The high value of habitats and features should be recognised by reference to their protected status including designated sites, where applicable.

The construction and operation of the proposed development is likely to result in adverse effects on the designated sites and their species for example:

- The Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI) contains a complex of habitats, notably mudflats, shingle beach, reedbeds, heathland and grazing marsh and supports populations of important birds, including bearded tit, Cetti's warbler and shoveler, scarce plants such as whorled water milfoil and a number of rare wetland moths.
- The Minsmere to Walberswick Special Protection Area (SPA) is designated for its breeding bird populations, including bittern, marsh harrier, avocet, nightjar, woodlark and several wildfowl species.
- The Minsmere/Walberswick Heaths and Marshes Special Area of Conservation (SAC) is designated for its coastal and dry heathland habitats.
- The Minsmere/Walberswick Heaths and Marshes Ramsar site is designated for its variety of marine, freshwater, marshland and associated habitats. It also supports a number of rare plants, such as red-tipped cudweed, invertebrates including the narrow-mouthed whorl snail, and important rare breeding birds such as avocet.

The RSPB Minsmere reserve forms a part of the Minsmere-Walberswick designated sites.

There are also likely to be adverse effects from the proposed development on Sizewell Marshes SSSI:

- Sizewell Marshes SSSI is designated for its lowland wet meadows and extensive ditches which support important assemblages of invertebrates and breeding birds, and several rare species of plants.

The RSPB expects all potential impacts to designated sites and their species to be fully assessed in the ES. These assessments are also required as part of the Habitat Regulations Assessment (HRA) requirements.

### 5. Project lifetime

Para. 3.3.29 states *"The proposed new nuclear power station would have a design life of 60 years."* However, para. 6.21.40 states *'it is anticipated that the proposed development will be in use beyond the design life.'*

Para. 3.12.10 states “*The Interim Spent Fuel Store (ISFS) would be designed for a life of at least 100 years, which could be extended if necessary.*” It would operate until a UK Geological Disposal Facility is available therefore the site must be protected from flooding in perpetuity.

It would therefore be reasonable to consider the proposed development as permanent when assessing the potential impacts.

## **6. Socio-economics (pp 71-79)**

The stage 3 public consultation materials noted that significant effects may be experienced by visitors to Minsmere. The RSPB expects assessment of the impacts of the construction and operation of the proposed development on RSPB Minsmere and its visitors and where possible mitigation to be included within the ES.

## **7. Air quality (pp 98-106)**

Information presented at the stage 3 consultation suggested potentially significant impacts may arise from dust deposition and nitrogen oxide emissions from the construction area affecting the Minsmere-Walberswick designated sites and Sizewell Marshes SSSI. The RSPB expects assessment of the impacts of deposition of dust and nitrogen on sensitive habitats and effective mitigation. This assessment should also inform the HRA.

## **8. Terrestrial ecology and ornithology (pp 114-122)**

### **8.1 Designated sites and Minsmere**

The potential impacts from construction and operation of the proposed development on breeding and wintering birds of the designated sites and Minsmere should be assessed – including foraging marsh harriers from the Minsmere-Walberswick SPA and waterbirds using the Minsmere South Levels (within the SSSI but outside the SPA but functionally-linked to that SPA). This should include the effects of noise, vibration, hydrological and coastal processes on waterbirds and marsh harriers of the Minsmere South Levels. The assessment will also inform the HRA. Full details of impacts and proposals for sufficient evidence-based mitigation are required.

Para. 6.7.26 proposes mitigation for habitat loss within Sizewell Marshes SSSI. The ES should also include justification for habitat loss within the SSSI as required by para. 5.3.11 of EN-1 (Overarching National Policy Statement for Energy).

Para. 6.7.21 proposes a control structure on the Sizewell Drain to maintain the hydrological regime of Sizewell Marshes SSSI. The potential impacts of this, and any other changes to hydrology arising from the project, on Minsmere and the Minsmere sluice should also be assessed and adequate mitigation proposed.

### **8.2 Age of survey data**



We welcome the additional surveys completed since 2014 and those planned for 2019 to update the ecological baseline. The RSPB expects recent survey data for all protected species (including SPA and SSSI species) and habitats potentially affected and consider survey data from 2014 is too old to inform impact assessments without further verification and updates.

## **9. Amenity and recreation (pp 122-131)**

The RSPB expects assessment of the impacts from construction and operation of the proposed development including impacts from displacement of recreational users to designated sites (which will also inform the HRA) and impacts on visitors to RSPB Minsmere. Full details of impacts and mitigation are required.

## **10. Groundwater and surface water (pp 161-167)**

Table 6.18 notes the potential to change the surface water and groundwater flow and hydrochemical regimes and dependent ecological receptors during construction and operation. The RSPB expects assessment of the groundwater impacts (including eco-hydrological effects) on Sizewell Marshes SSSI, Minsmere South Levels (part of the Minsmere-Walberswick Heaths and Marshes SSSI) and the impacts of increased discharge to Minsmere Sluice from Leiston Drain on drainage of the northern parts of RSPB Minsmere. This should include assessment of the impacts of the construction (and potential breach) of the sheet piling and cut-off wall proposed as mitigation to provide separation between the construction site and Sizewell Marshes SSSI. The assessment must include full details of all potential impacts and propose sufficient and effective mitigation.

## **11. Flood risk (pp 167-173)**

### 10.1 Flood risks to designated sites and Minsmere

Paras. 6.13.22-25 state there are potential flood risks to the surrounding area from construction and operation of the proposed development. The potential impacts from construction and operation on flood risk to RSPB Minsmere and Sizewell Marshes SSSI should be assessed.

The SSSI crossing cannot fail to act as a barrier to water movement in the event of a coastal breach and we expect a full assessment of the potential impacts on Minsmere. The Stage 3 public consultation materials also explained that the SSSI crossing could be raised in future to provide further protection against flood risk. We refer to our response to the stage 3 consultation:

*'We are concerned that this could have the effect of diverting flood water towards Minsmere and expect to see a full assessment of this scenario to demonstrate that no significant impacts would result.'*

We also recommend that the relationship between the flood risk assessment and impacts on hydrological function of designated sites is also identified and assessed.

### 10.2 Climate change effects

National Policy Statement for Nuclear Power Generation (EN-6) para. 3.6.7 states:

*“Applicants must also be able to demonstrate that they could achieve further measures for flood management at the site in the future if future climate change predictions show they are necessary.”*

We expect to see an assessment that incorporates the effects of climate change on flood risk.

The effects of climate change should also be considered in the design of any mitigation to ensure that the mitigation remains functional throughout the necessary timeframe.

## **12. Coastal geomorphology and hydrodynamics (pp 173-183)**

Minsmere and the Minsmere-Walberswick designated nature conservation sites are within the study area (para. 6.14.7) but are not listed as potential receptors (para. 6.14.25). The potential geomorphology impacts on designated sites and Minsmere must be fully assessed, taking account of the degree of uncertainty in modelling the pattern of coastal evolution over the lifetime of the project and climate change effects. Any mitigation required should be detailed with supporting evidence to demonstrate reasonable certainty that the proposed mitigation will work. We request a plan to monitor effects on coastal processes during construction and operation to ensure impacts are identified in a timely manner with agreed thresholds for triggering implementation of avoidance or remedial measures.

Flood defences and coastal protection measures (including the redevelopment of the Northern Mound) are permanent elements of the main development site (para. 3.3.6) and were identified as elements that could have impacts on coastal geomorphology and hydrodynamics in the 2012 scoping report (para. 7.13.23). They are not identified as such in the 2019 scoping report (para. 6.14.24) and there is no justification given for removing them. The RSPB considers impacts of flood defences and coastal protection measures on Minsmere and the Minsmere-Walberswick designated nature conservation sites should be included in the impact assessment, mitigation and monitoring programme.

## **13. Marine water and sediment (pp 183-190)**

The thermal plume from the cooling water outflow could affect prey availability for marine birds e.g. red-throated diver, little tern and sandwich tern. The RSPB expect the impacts to be fully assessed.

## **14. Marine ecology (pp 190-211)**

The cooling water system would entrain fish which are prey species for marine birds such as red-throated diver and little tern. The potential increase in shipping movements associated with the development could increase disturbance to red-throated diver. The impacts should be fully assessed.

## **15. Climate change (pp 239 –262)**

### 14.1 Climate change resilience (CCR) assessment

Para. 6.21.51 states *‘The CCR assessment will have a temporal scope of 60 years based on NPS guidance for the estimated operational design life of a nuclear power station. The CCR assessment will consider a*

*high emissions scenario at the 10%, 50% and 90% probability levels to assess the impact of climate change over the lifetime of the proposed development.'*

However, para 3.8.5 of EN-6 states:

*"In applying the policy on mitigation set out in Section 5.5 of EN-1, and having taken account of the effects of climate change over the lifetime of the project (including any decommissioning period), the IPC should be satisfied that the application will include measures where necessary to mitigate the effects of, and on, coastal change."*

The construction will last 9-12 years (para. 3.3.9), operation 60 years (para. 3.3.29) and decommissioning 20 years (para. 3.3.46). Furthermore, para. 6.21.40 states that *'it is anticipated that the proposed development will be in use beyond the design life.'*

Therefore, we consider the CCR assessment should have a temporal scope of at least 90 years to include construction, operation and decommissioning of the proposed development.

The lifetime of the Interim Spent Fuel Store is 100+ years, which could be extended if necessary therefore the temporal scope for that assessment should be 100+ years.

#### 14.2 Designated sites and Minsmere

The Overarching National Planning Policy Statement for Energy (EN-1) states:

*"4.8.10 If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the IPC (replaced by the Planning Inspectorate) should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.*

*4.8.12 Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the IPC may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls)."*

Protecting the proposed development from climate change impacts may cause adverse environmental impacts upon statutory designated sites and Minsmere and these will need to be included in the assessment. An appropriate monitoring and evidence-based mitigation programme will be required for the lifetime of the proposed development.

The CCR assessment should also include climate change effects on management of mitigation/compensation sites e.g. Aldhurst Farm, fen meadow and marsh harrier foraging habitat and on continued effectiveness of any mitigation for hydrological and coastal impacts.