

SCAR RESPONSE TO EDF ENERGY PHASE 2 CONSULTATION FOR SIZEWELL C

1. *Stage 2 consultation does not provide the information SCAR requires*

- 1.1 SCAR is concerned with the possible impact of a Sizewell C project on the Suffolk coast. We have reviewed the Stage 2 Pre-Application Consultation document and our members have visited EdF public exhibitions. No specific and quantified evidence has been presented to enable us to assess the magnitude, geographical and timescale extent of shoreline and groundwater impacts from SZC.
- 1.2 The Sizewell C EIA Scoping Report April 2014 contained sections on groundwater, surface water, coastal geomorphology and hydrodynamics. These included proposals for further studies, sensitivity assessment, impact evaluation and mitigation. We understand that EdF's continuing work is shared with a forum of Statutory Bodies and their advisors, but that confidentiality agreements prevent it being shared with coastal community stakeholder groups.
- 1.3 These restrictions fail to recognise that SCAR members have essential and detailed working arrangements with statutory authorities for ongoing coastal management of which SZC would form a part. Withholding information about the significance of impacts would hardly stand a test of reasonableness in our members giving evidence to a DCO examination, including those engaged in preparing a Neighbourhood Plan under Localism legislation.

2. *Immediate action to share EdF data with community stakeholder representatives*

- 2.1 We therefore consider it essential for EdF to adjust its arrangements with Suffolk Coastal District Council and the Environment Agency in particular, if they agree, to enable accredited coastal community representatives to have access to relevant SZC information. This should be done immediately following Stage 2 consultation in order for us to have quantified evidence before Stage 3 and any subsequent input to the Planning Inspectorate.
- 2.2 We would be pleased to discuss the information we need in more detail. In principle the modelled results should be mapped for each impact category showing where magnitudes, positive or negative, exceed naturally expected variations using a realistically predictable baseline. Changes in parameters including wave data, bathymetry, sediment volumes, water levels, would then translate to potential change in shoreline and landform against time.
- 2.3 In relation to SMP policies and epochs we need to assess the extent of impacts adjacent to the EdF site, and more widely in the sediment cell, during construction, operation and post operation. Results would include recent climate change projections (e.g. BEEMS 2014). Monitoring and proposals for mitigation of EdF impacts would be assessed before co-ordination with any other planned interventions as part of integrated coastal management.

3. Summary of typical issues we wish to pursue

- 3.1 At Stage 2 we expect to see the quantified results so far on the assessments detailed in sections 7.11, 7.12, and 7.13 of the EdF EIA Scoping Report, and the associated issues raised in the Planning Inspectorate Opinion Report, including those by consultees in Appendix 2. This would indicate the relative scale of possible impacts to inform our members' participation in coastal management planning. We appreciate that impact sensitivity analysis is ongoing pending further design work. But release of information only at a minimum duration Stage 3 period would not be acceptable. Information available to us via the Statutory Bodies route could add the value of their expert advisors, including relationships to non-EdF coastal work already underway.
- 3.2 We note EIA Scoping Report section 7.13.3: *Most effects, such as changed wave climate due to the jetty, will be localised often to within a few tens of metres of the construction site and require high resolution modelling on a small scale. However, longshore sediment transport is a long-term process and acts over larger scales, typically the sediment cell.*
- 3.3 Changes in groundwater and surface water pathways, together with projected water level changes in the Minsmere Levels, are a key concern and must be quantified. These must include the cut-off wall, drainage changes, dewatering, pumping, catchment changes and other associated changes over the construction and operating timeframes.
- 3.4 Retaining the option to re-position the operating platform landward, and the design of the northern defence termination at the BLF, must result in the avoidance of shoreline discontinuities which accelerate inappropriate coastal realignment, and deviation from the SMP.
- 3.5 We note that the original CEGB assessment of site appropriateness may no longer hold towards a 2130 horizon with permanently flooded northern and western boundaries which increase radiological risk from leaching, spillage and emergency access to significant incidents.
- 3.6 Clarity of why a permanent BLF is needed, e.g. that turbine rotors cannot be transported by road, as now.
- 3.7 Clarity about the draught of vessels which would enable a jetty or BLF to be used without dredging.
- 3.8 Concern that the cost and logistics of removing a heavily piled jetty, and the history of the inability to control EPR construction timeframes, would result in it remaining indefinitely. However a jetty could be designed to have positive benefits for the coastal environment.
- 3.9 Credible programme management proposals are omitted. Concern that fabrication problems and the lack of any EPR operating experience to date could result in adverse local impacts from a heavily extended SZC pre-operational period.
- 3.10 In finalising the marine / rail balance the need for Network Rail and the operating Franchisees to demonstrate East Suffolk Line working diagrams having realistic perturbation margins which provide reliable passenger mainline connections at Ipswich, the intended Lowestoft-London paths, and increased Felixtowe freight working. This may favour cascaded freight night paths for SZC in a preferred rail option.

- 3.11 Review that the rock armour toe depth is sufficient and that its littoral profile avoids end embayment particularly with NE long-fetch wave climates.
- 3.12 Demonstrate whether sediment transport impacts cross the coastal process system interface at Thorpe Ness. Correct the references to Thorpeness and Thorpe Ness.
- 3.13 Cooling water intakes and outfalls are taken to have insignificant shoreline impact.
- 3.14 Clarify whether North Sea dredging for construction aggregate is an option, and a possible licence area.
- 3.15 In summary the mapping approach would show impacts beyond natural change which would be:
 - (a) negligible or highly localised
 - (b) containable within the EdF frontage
 - (c) wider ranging and which might require mitigation / ongoing monitoring

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