



Aldeburgh Town
Council's Response to:

**SIZEWELL C
STAGE 3
PRE-APPLICATION
CONSULTATION**



A vision of Aldeburgh's future... A prosperous, properly protected coastal town that is well-organised and proud of its past as well as being confident in its future. A welcoming place where visitors arrive expectant and leave uplifted.

A united town with a definition of community that is broad and inclusive –
Aldeburgh Town Plan 2015



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[Appendix 1: ATC's response to
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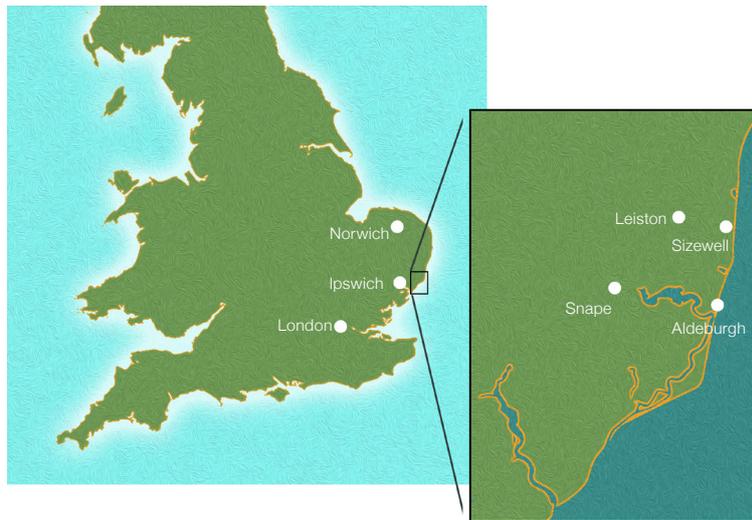
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Introduction:

Aldeburgh is a small town situated on the Suffolk Coast between Lowestoft and Felixstowe of around 2,700 inhabitants, roughly 2 miles south of Sizewell B, and principally accessed by one single carriageway 'A' road.

The town and surrounding area lie within the Suffolk Coast and Heaths AONB which contains many areas of special interest (e.g. the AONB itself, RAMSAR, SSSIs), is constrained by marshland to the north and the River Alde (RAMSAR, SSSI site 682) to the south.



It is a well-known 'destination' town, heavily associated with the Arts, due to targeted policies promoting this by the Local Planning Authority.

The demise of traditional livelihoods such as fishing and brick making means that the town's viability almost entirely depends on tourism and leisure, with this prosperity attracting an economic uplift to surrounding villages.

While approximately 50% of the properties in Aldeburgh are second or holiday homes, the town has worked hard to improve the year-round tourist offering, with the population regularly swelling from under 3,000 to well over 15,000 at weekends and peak times.

The town is renowned for having a strong international presence in Arts and Music. Various events now attract visitors throughout the year, with documentary, poetry and literary festivals, a variety of musical events, High Tide and the Aldeburgh Festival.



It is known as the home of Benjamin Britten and Elizabeth Garrett Anderson and E M Forster and Susan Hill have cited the area as inspirational.

Aldeburgh has an attractive shingle beach and the town is set within a remarkably unspoilt area, surrounded by protected environmental sites.

Where it is considered that Aldeburgh Town Council (ATC) is unable to give a fully quantifiable response due to insufficient knowledge, where appropriate, a considered opinion will be given. In addition, it is important it is recognised that information and opinions now offered, will be out of date by the time this project becomes live are not absolute or restrict further input.

In general ATC will confine its answers to those areas specifically impacting on the town of Aldeburgh; where some issues may also affect the surrounding area, some are peculiar to the town.

While we wish to support other areas, villages, Parishes, with specific demands and needs, these will not be covered in our detailed feedback but may form additional supporting material where relevant.

The views of Aldeburgh Town Councillors, residents and organisations within the town are encompassed within this response, the result of a lengthy consultation with the community (See Appendix 1). This response was ratified at a Council Meeting on March 11th 2019.

The following is ATC's response to the Sizewell C Stage 3 Pre-Application Consultation..

Summary

- ATC believes the siting of a generic-design nuclear power station in an Area of Outstanding Natural Beauty is inappropriate and would threaten an internationally-famous land and seascape.
- ATC calls for substantial mitigation measures to address noise, vibration, lighting and air quality concerns during the construction period.
- The potential impact on the local fishing industry from changes to the seabed caused by development is of concern to ATC, which believes more research is required.
- ATC calls for a quantifiable strategy to ensure there is a balance between the employment needs of the town and those of Sizewell C.
- The accommodation campus currently planned for the village of Eastbridge/Theberton should be re-sited to an existing urban area.
- ATC believes the four-village bypass scheme should be adopted.
- To protect Aldeburgh's vital tourist trade, ATC believes EDF Energy should ringfence a substantial sum of money to be used exclusively for the promotion of the town before, during and after construction.
- The cumulative and detrimental effects of concurrent large infrastructure projects have not been fully considered.
- In the event of Sizewell C obtaining planning consent, ATC will be seeking substantial mitigation measures for the lifetime of the project.
- An ATC Community Engagement strategy has identified a large number of concerns expressed by residents of the town, who believe more solutions are required before EDF Energy receives planning consent.



Sizewell C Proposals Overall

The impact on Aldeburgh has the potential to be two-fold.

Potentially there will be physical difficulties - traffic congestion and disruption, infrastructure overload, imbalance of accommodation needs and requirement and possible damage to the beach, the coastline and the wider environment. Also the potential of severely reducing the quality of life of residents.

More immediately, is the perception that the construction of Sizewell C will have a negative impact on the image of the town, potentially resulting in a massive reduction in visitor numbers and a threat to Aldeburgh's economy, almost entirely based as it now is on tourism. Visitors trying to get to Aldeburgh might find neighbouring towns more appealing and easier to access during the construction period and possibly for the life of Sizewell C.

Insufficient information has been provided by EDF Energy at this Stage 3 consultation to truly enable informed choices to be made on the various options that are being presented.

No reasons have been given for some options being increased or reduced, the level of detail presented falls short of permitting 'adequate consultation' to take place, as set out in EDF Energy's Statement of Community Involvement.

The design of the buildings should be to an exceptionally high standard to complement and enhance the 'Area of Outstanding Natural Beauty' (AONB) in which it is proposed to be built.

EDF Energy must explore fully sustainability issues in the development of 'C' and also in any legacy infrastructure remaining to the local communities.

Central Government should be required to step in now by bringing forward projects and funding new ones, especially based on the road and rail networks. ATC urges the Government that, in promoting policies including the Eastern Powerhouse/Renewables Gateway/Energy Coast, the Heritage Coast, Area of Outstanding Natural Beauty and SSSIs are preserved

for future generations. ATC believes it would be more appropriate for brownfield sites in more developed areas such as Felixstowe and Lowestoft to be used for future infrastructure projects. These areas would benefit from regeneration projects that create jobs.

Improved transport and communication links will help access the town and the immediate area and will also improve life opportunities to the north of the county and further into Norfolk.

That a sustainable legacy remains is important, in the form of uplifted skills, road, rail, further education and sporting facilities, accommodation, together with generally sustainable economic compensation for the decades of externally imposed development from the project to mitigate the disruption caused.

Infrastructure, local roads together with other services (such as sewerage, healthcare and policing) may need updating/enlarging by EDF Energy, otherwise this could possibly be at the expense of other communities, not directly affected, by diverting scarce investment resources



Main Development Site: Overall

Visual Impact:

ATC believes that EDF Energy is missing an opportunity to create iconic buildings within this important Area of Outstanding Natural Beauty.

ATC understands that insufficient investigation has taken place to reduce the impact on the AONB by an improved or modified design to improve the fit of Sizewell C into the landscape.

EDF Energy should be compelled to provide sufficient evidence to justify its decision to opt for a generic design of reactor cover instead of one to complement the B site. It appears that in its desire to cut costs by replicating the Hinkley Point site design at Sizewell, EDF Energy has failed to recognise the fundamental environmental difference between the two sites.

Sizewell is within an AONB and the design of the new building must reflect this.

ATC believes the placement of a generic design of nuclear plant into the AONB does not meet criteria laid down in The National Policy Statement for Nuclear Power Generation (EN-6):

“Projects need to be designed carefully, taking into account the potential impact on the landscape. The development should aim to minimise harm to the landscape and provide mitigation measures where appropriate. In particular, the development should avoid harming AONBs, which have the highest status of protection.”

In assessing the suitability of the Sizewell site to host a new-build, NPS (EN6) states that *“...the visual and landscape impact of the development will be mitigated, in part, by locating the principle structure along the same visual axis of the existing stations.”*

Given this guidance, ATC cannot understand why EDF Energy has sited the reactor buildings for Sizewell C on such an axis that they will clearly visible west of the existing buildings when viewed from Aldeburgh and the adjacent coastline.

EN-6 (5.14.70+5.14.72) state that *“given the scale of the development, there are likely to be some long -lasting adverse direct and indirect effects on the landscape character and visual impacts on the Suffolk Coasts and Heaths AONB with limited potential for mitigation.”*

ATC believes that EDF Energy has underestimated the extent of the mitigation measures required to address the visual impact of imposing on Sizewell the generic design used at Hinkley C. To facilitate development of Sizewell C, EDF Energy plans to relocate Sizewell B buildings and infrastructure to greenfield locations. This will have a negative visual impact and will mean a loss of screening to Sizewell B and Sizewell A existing power stations.

[See Appendix 1](#)

ATC strongly objects to proposals to erect additional pylons north of the Sizewell C site. Insufficient evidence has been presented to justify this decision, which appears to have been made arbitrarily. Additional pylons would contribute to the industrialisation of this area and ATC calls for new power connections to be buried underground.

Suffolk County Council, Suffolk Coastal District, the East Suffolk Destination Management Organisation and other bodies have spent millions of pounds investing in this region's tourist trade, principally because of the outstanding beauty of the area.

This vital revenue could be jeopardised by unsuitable buildings and similar associated infrastructure.

Conclusion

- ATC objects to the siting of a generic-design power station in an Area of Outstanding Natural Beauty and calls for a design which is more sympathetic to the local environment.



Environmental effects:

Noise and vibration

ATC believes that it is safe to assume that there will be a substantial amount of noise and vibration from borrow pit extraction, construction of the main site, accommodation campus, new road infrastructure, car park construction and traffic movements. This will have a negative impact on historic buildings, human health, wildlife, tourism and recreation and will need monitoring and mitigation measures.

See Mitigation p.30

Lighting

A generic copy of the design and lighting rationale of Hinkley Point C is inappropriate and insufficient in this AONB. Serious consideration should be given to alternative schemes, where, for example, lighting is diffused and does not pollute the skyline. Many residents and visitors have been or are attracted to this area because of the dark skies and lack of light pollution. Professional consultation will be required in order to help mitigate the implied negative impacts associated.

See Mitigation p.30

Land use, including access and provision of green spaces:

ATC is keen to understand how land will be allocated during the construction process. Some areas have been identified, but there is also a significant volume of land currently classified as AONB or SSSI which should be protected and is currently unaccounted for.

Sizewell C is the only proposed nuclear site in Britain within an AONB and, as such, would require significant mitigation measures to replace habitat lost during the construction process and beyond.

To facilitate the transport model, many bridleways, cycle and footpaths and pedestrian/cycle rail crossing will be closed either temporarily or permanently. This area of the AONB is well-used and safe access for the public to land adjacent to the nuclear site should be maintained at all times.

EDF Energy is currently planning to relocate infrastructure at Sizewell B to facilitate construction work at the C site. This proposal would mean a significant loss of AONB land at Coronation Wood, a 100-year-old forested area, and Pillbox Field.

ATC is opposed to this proposal. [See Appendix 1](#)

This land forms a natural 'buffer' between the nuclear sites and acts as an important screening measure which should be retained.

ATC believes that EDF Energy has underestimated the extent of the mitigation measures required to address this issue.

Air quality:

The potential construction of the main site, park and ride facilities, HGV compound and associated buildings (training and visitors centre etc) will all give rise to dust pollution and comprehensive suppression measures will be required.

If any of the local air quality management standards are predicted to be exceeded, additional assessments should be undertaken, the results published and mitigation arranged - or the activities ceased.

The extra air pollution and additional dust generated by the proposed spoil regime needs to be continuously monitored, with contingency planning to deal with events exceeding national guidelines.

ATC is concerned with dust drifting south to Thorpeness and to Aldeburgh and calls on EDF Energy to put in place a strict monitoring regime within the town.

Of equal concern are the short and long-term dangers of emissions from HGVs, LGVs and the increased volume of other commercial and domestic traffic. The resulting increase in diesel fumes on local roads will affect walkers, cyclists and residents and could impact on roadside vegetation and wildlife. This area produces crops and vegetables and many farms border the A12 and roads approaching the construction site.

[See Mitigation p.30](#)



Water resources/sea defences/coastal processes:

ATC calls for a coordinated water-use strategy. A multi-agency approach is required to formulate a coherent policy to deliver adequate resources for workforce activity and industrial operations. Abstraction and foul drainage collection/disposal would also be of concern, as this may affect local groundwater levels. The risk of flooding from fluvial and surface water and sewers during construction, would also need to be assessed.

ATC regrets EDF Energy's decision to abandon plans to build a jetty and is also disappointed by the lack of information provided by EDF Energy about the long-term effects of their preferred option, the beach landing facility. ATC is keen to see all relevant data relating to this decision, particularly in respect of the permanent piles. These might cause changes to the shape and/or composition of the beach to the detriment of the public.

ATC is concerned about the potential impact on the local fishing industry from changes to the sea bed, sandbanks and tidal flows caused by developments which could impact on the underwater topography. More evidence and research is needed from the fishing industry regulators and marine organisations.

Results of any underwater surveys commissioned by EDF Energy should be made available to enable local communities to assess the impact of its proposals on the fishing industry and marine ecology.

The route of the SSSI crossing is a decision which must not be taken lightly. EDF Energy states that this proposal is the best ecological choice.

Currently, no evidence has been produced for this assertion. All relevant bodies need to be consulted on this important decision and EDF Energy should be guided by expert advice and not expediency.

The National Policy Statement for Nuclear Power Generation (EN-6), recognises that the development of Sizewell C could result in:

- **An adverse impact on the capacity of the area to absorb and disperse flood water.**

- Existing sand and shingle flood defences which might require upgrading.
- A significant strategic effect on biodiversity could not be ruled out.
- A potentially adverse effect on the integrity of eight local EU sites of importance, through impacts on water resources, habitat and species loss and fragmentation and disturbance - noise, light and visual.

See Mitigation p.30

Conclusion

ATC has grave concerns about the environmental impact of EDF Energy's proposals for the Sizewell C site. Insufficient evidence has been provided to fully assess, among other things, lighting issues, underwater surveys, noise and vibration and land allocation.



People and economy:

ATC recognises the significant economic contribution that EDF Energy's existing nuclear power station currently makes to Aldeburgh and the immediate area and welcomes its ambition to produce a long-term boost for the local economy with the construction of Sizewell C.

ATC recognises EDF Energy's stated aspiration to avoid, mitigate or manage any adverse social or economic effects. Where negative impacts are identified these should be mitigated but, of equal importance, is that positive impacts on the local economy are both secured and maximised.

The importance of tourism, our significant retired population and the large number of properties given over to short term rental are factors which give rise to particular local sensitivities. In addition, the potential diversion of workers from local trades and care and hospitality industries to jobs at Sizewell C gives rise to considerable concern.

ATC believes these issues have still not been adequately addressed by EDF Energy and more work is required.

Local Job Market and Supply Chain:

ATC understands that EDF Energy has undertaken to employ local people and suppliers in the construction and operation of this project. Whilst this has the potential to disrupt availability of workers in the existing economy, ATC recognises there is an opportunity for the local area to benefit from the creation of new jobs, development of skills and business competency and supply chain opportunities. In order for these to be quantifiable, it would be necessary to examine EDF Energy's plans in this regard. ATC calls for a redefinition of the term "local" when applying to workers. EDF Energy regards "local" as being within 90 minutes travel time from Sizewell. ATC believes this is unrealistic and should be reduced to 45 minutes.

The denuding of skills from the local economy and its adverse impact has been identified in the response set out in 4.5.27-43 of the Consultation Document.

However, insufficient thought has been given to this matter. That several hundred workers from existing local firms will be required to fill high-paid roles at Sizewell C is a positive, what has not been examined is the shortfall of essential employees in traditionally low-skilled jobs in Aldeburgh this will create.

Conversely, evidence is emerging from Hinkley Point that workers there are being encouraged to transfer to Sizewell C. At this point, this seems to fly in the face of EDF Energy's commitment to up-skill a local workforce and throws into doubt estimates of the number of job opportunities at Sizewell C.

ATC calls for greater engagement with EDF Energy to formulate a quantifiable employment strategy to ensure there is a balance between the needs of the town and those of Sizewell C.

Education, Skills and Vocational Training Opportunities:

ATC believes that the opportunities for education and the development of skills could be a major benefit to the entire area. EDF Energy's expressed intention to train workers to meet the demands of the project as it progresses is welcomed.

If EDF Energy is serious about recruiting and up-skilling local people, a raft of infrastructure improvements are needed to enable young people to acquire the skills required at Sizewell C. Poor public transport links are denying education opportunities to potential employees, together with broadband and mobile network deficiencies.

It is vital that EDF Energy recognises and responds to this problem firstly, through consultation, recognising that deficiencies exist and, then, by putting forward options to positively address the situation.



Improved transport links and better infrastructure would give a long-lasting boost to the entire area and could, eventually, attract new businesses and jobs. The training legacy plan must include a solution to prevent - post-construction - large-scale unemployment created by a boom-and-bust scenario.

Similarly, ATC would expect EDF Energy to make provision for school places for the children of workers living in Aldeburgh during the construction period. At present, the Primary School is at capacity and additional facilities will be required to accommodate an influx of young people. EDF Energy needs to address this issue as a matter of urgency.

As a feeder school to Alde River Academy (a member of the Waveney Valley Academy Trust), ATC recognises that benefits should accrue to the ARA through the continued involvement with EDF Energy and would support engagement with the Academy in any way possible.

Public services and community facilities

In its response at Stage 2, ATC raised concerns regarding the potential effects on existing services used by the local community, such as medical facilities, police and emergency services, the increased need for policing due to anti-social behaviour by workers and an enhanced risk of terrorism.

ATC notes EDF Energy's commitment to providing occupational health services for its workforce at the main development site, but questions whether this goes far enough. There could, potentially, be a residual impact on the town's health facilities and a funding contribution from EDF Energy should be sought.

Should many homes, currently utilised on a part-time and/or holiday basis become occupied full-time, this will create a considerable, additional burden on all elements of infrastructure in the town - currently only roughly 50% of houses being occupied through the majority of the year.

ATC supports EDF Energy's intention of implementing a code of conduct for all workers however, even greater provision should be made. For example, funds for additional community police officers and the installation of a hotline to report anti-social behaviour.

ATC would be keen to see close collaboration between Suffolk Constabulary and EDF Energy to be seen to be addressing the concerns of the wider community.

See Mitigation p.30

Conclusion

ATC is concerned with the potential diversion of workers from local trades to higher paid jobs at Sizewell C and calls for a quantifiable strategy for dealing with this issue; the overloading of the town's health facilities by construction workers and concerns about anti-social behaviour.



Accommodation:

ATC believes there are huge ramifications for Aldeburgh in EDF's accommodation strategy and calls for a fundamental reappraisal of the proposals.

The proposed accommodation campus for 2,400 workers is regarded as "on-site." Though close by, this is, by no stretch of the imagination, accurate. It is, in fact, located in the rural village of Eastbridge/Theberton (population approximately 1,300) which is on the periphery of the nuclear site. The provision of this accommodation campus will, in the opinion of ATC, create enormous social and economic problems locally and, with a knock-on effect, potentially, for Aldeburgh.

ATC believe the proposals as they stand will have a negative impact on the immediate area, leading to anti-social behaviour and overcrowding in the limited number of restaurants, public houses and leisure facilities nearby.

ATC is concerned that following a relatively short period of prosperity in this area, the local economy is likely to slump post-construction work - as evidenced after Sizewell B was built.

However, websites currently providing information to workers at Hinkley Point C encourage them to use facilities outside the campus stating that " ...it is surrounded by local restaurants and pubs offering an array of choice should you wish to explore during an evening." Clearly, this does not match EDF Energy's assurance that workers will stay primarily in the campus, where behaviour can be controlled.

ATC believes that urgent consideration should be given to siting the main workforce accommodation in urban areas, where infrastructure already exists to cater for thousands of workers, with both Ipswich and Lowestoft able to provide long-term accommodation. Either town would benefit from such an arrangement which would provide an economic boost and a legacy of affordable housing. A smaller, long-term facility could be housed at Sizewell for emergency and outage workers.

ATC fears that a large campus housing thousands of workers and sited within seven kilometres of Aldeburgh would put the town's public services and fragile tourist economy at great risk.

ATC challenges EDF's accommodation strategy on a number of issues:

- At Hinkley Point, only 1,496 are accommodated within the site. EDF Energy proposes to house a total of 3,000 workers adjacent to Sizewell C, despite opposition at every consultation stage.
- **ATC would like to know why there is a significant difference in the on-site worker population between Hinkley Point and Sizewell C.**
- EDF will provide shuttle bus transport to relay workers between accommodation at Sizewell, train stations and leisure facilities.
- **If EDF Energy is prepared to provide this service, it should be able to provide a similar service to relay workers from accommodation in large urban areas.**
- ATC calls for a more imaginative solution to the current accommodation proposals. [See Mitigation p.30](#)
- ATC rejects the notion that a local campus would significantly reduce pressure on tourist accommodation and the private rental market or that it would allow EDF Energy to manage worker behaviour to a satisfactory level.. No evidence to substantiate these assertions has been submitted.
- ATC understands that at Hinkley Point, compensation was paid to local communities where EDF Energy estimates of worker ingress was under-estimated.
- **To be consistent, therefore, communities close to Sizewell, including Aldeburgh, should expect to receive the same level of compensation if this was to occur.**

Conclusion

ATC regards EDF Energy's accommodation strategy as totally flawed and calls for the main campus to be sited in existing urban areas and not a rural community.



Transport:

ATC recognises that EDF Energy has attempted to address some of the identified problems that might be expected to arise for local communities.

However, ATC notes the omission of LGVs from the control measures and advises that the effect of these vehicles should be considered together with that of HGV traffic from the, likely, concurrent energy projects.

It is also noted with some concern that the road network improvements are not all to be in place before the main construction begins. To have them in place for “peak construction” is not satisfactory.

Traffic Modelling:

ATC is reassured that industry standards are being applied for traffic modelling, but is concerned about the robustness of the assumptions underpinning the input to the models e.g. proportions of workers walking, cycling or car sharing.

ATC has additional concerns:

- That traffic caused by other infrastructure projects is not, in combination, considered by the models.
- The effects of considerable pre-construction traffic would not be supported by the necessary infrastructure.
- The possible congestion on the Woodbridge section of the A12, the primary North-South Route has been insufficiently addressed or considered.

Road-led proposals: North and South Park and ride facilities

ATC welcomes the provision of park and ride facilities to reduce traffic to and from the nuclear site and approves of the improved access on to the A12. This is an opportunity to reduce air pollution by ensuring the buses used for the park and rides are low emission vehicles, which provide a long-term legacy for the area.

Major Road Improvements: Theberton Bypass and Sizewell Link road

ATC considers the Theberton bypass an inferior solution to the link road, even in the rail led strategy, principally because of likely LGV traffic volumes and the possible extra traffic from other concurrent projects. There appears to be no rationale behind a recently-introduced proposal which would cut the village in half and materially-affect many roads during construction.

ATC still considers the mooted D-route (now referred to as the W-route) as a potential alternative, especially as it would also ease traffic congestion in Saxmundham town centre. The junction of the W-route and the A12 would seem a suitable site, also, to house the accommodation block – thus providing a lasting housing legacy for Saxmundham.

Two (Four) Villages Bypass:

ATC considers this to be an absolute priority only outweighed by the four village's option, which ATC prefers. Particularly welcome is the A12/A1094 junction improvement.

Yoxford Roundabout:

ATC welcomes the proposed improvement to this junction as it is likely to be a pinch point and/or safety risk during construction.

Freight Management Facilities:

ATC welcomes the provision of the freight management facilities proposed in conjunction with the road-led transport strategy. However, ATC believes this provision should be made within the rail-led proposals.



ATC also has concerns about HGV driver's tachograph limitations. Large parts of the county could be turned into an ad hoc HGV park when drivers have run out of driving hours. A rigorous transport flow system is required to prevent this happening.

Minor Highways Improvements:

ATC has concerns with plans for the continued use of the B1122 by EDF Energy to access the A12 at Yoxford.

Improvements at the A12/A1094 junction are included, but there is no information as to how any potential negative impact on traffic flow along the A1094 will be mitigated, especially as this road narrows in parts to less than two full-width lanes. ATC is also concerned about the A1094/B1069 junction which is a serious accident site and the A1094/B1121 Friston junction, which could be improved by better sight lines for those turning on to and off the A1094.

ATC is not convinced that EDF Energy has demonstrated the ability or commitment to monitor and control 'white van' and personal car traffic to and from the nuclear site. ATC fears problems resulting from vehicles using rat-runs and short-cuts, with fly parking adding to traffic flow and access problems.

Rail Led Proposals:

ATC realises the value of the rail-led option for the removal of HGV traffic and urges EDF Energy to further investigate options to make this strategy an effective means of transport during the construction process. Over-reliance of road transport will create air quality issues as evidenced in SCDC's annual air quality status report:

www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/air-quality-consultations/open-consultations/

Transport Strategy Conclusions:

The jetty option received widespread support at the Stage 2 Consultation and ATC regrets the abandonment of this proposal. This decision will have a negative impact on road traffic, particularly as EDF Energy does not appear keen to pursue a comprehensive rail-led policy. Whilst ATC considers that EDF Energy has listened to the responses on the transport mitigation proposals from Stage 2 and that the Stage 3 proposals are a major advance on these, ATC still feels that EDF Energy has some transport issues to address:

- The W-route should be preferred to the Theberton bypass for both rail and road strategies.
- The four-village bypass option should be adopted.
- Due to LGV concerns, local speed limits and traffic calming measures should be employed on likely “rat run” routes e.g. via Saxmundham Road/Leiston Road in Aldeburgh.
- The daily number of Park and Ride Bus journeys is considerable and should be added to HGV journeys to assess possible heavy vehicle nuisance, including air pollution.
- Projected hours of HGV/LGV movements would be more acceptable if the link road was used for return journeys after the 23:30 delivery deadline.
- ATC also has concerns around the phasing of the infrastructure projects (rail-led and road-led). It considers that these should be completed pre-peak construction.
- Overall, ATC considers pre-construction traffic as a major problem for all communities and that it has not been adequately addressed.
- Insufficient evidence has been provided to demonstrate the possible cumulative effect on traffic volume and flow on routes that may be used by other Nationally Strategic Infrastructure Projects being constructed concurrently with Sizewell C.

See Mitigation p.30



Tourism:

Tourism is vital to the economy of Aldeburgh and any potential negative effect on the tourism market is likely to have a significant social and economic impact on the town and local area.

Tourism is responsible for the majority of the economic growth in the town, with many of our residents and the residents of the surrounding area either directly employed in tourism and hospitality or employed by businesses dependent on the sector.

Aldeburgh also provides the area's main tourist accommodation centre, acting as a draw for people visiting other attractions in the wider Suffolk Coastal region.

ATC is aware that EDF Energy is working with tourism stakeholders at a national, county and local authority level to identify the potential impact on the wider tourist trade.

However, ATC believes that, despite assurances from EDF Energy, the potential impact on the Aldeburgh's vital, but fragile, tourist-based economy has not been fully assessed.

ATC has concluded that if Sizewell C is granted development consent without a concerted and considered press relations campaign, there could be a catastrophic effect on the town's economy. Aldeburgh should be regarded as a particularly sensitive location and should be included in any discussions between EDF Energy and other bodies to jointly agree measures to avoid or mitigate any adverse effects on our tourist trade before they happen.

After EDF Energy's Stage 2 public consultation, Suffolk Coastal District Council working alongside Suffolk County Council remained concerned with the potential impacts of the Sizewell C proposal on the economics of the project during construction and operation phases.

In order to be in a position to challenge EDF Energy during their planned Stage 3 public consultation, a report was jointly commissioned to assess the potential local economic impact of the Sizewell C development on East Suffolk.

The report recognised there would be an economic boost, but also identified a threat to the tourism trade:

“.....any discouragement of visitors from the local area will have a negative economic impact. A 1% drop in visitor numbers would mean a loss of £6 million of local economic impact per year, and a 5% drop in visitor numbers would mean a loss of £30 million per year.”

The report also drew attention to another negative aspect of Sizewell C:

“..... It is recognised that much of the negative impact on the tourism sector will be in close proximity to the site (e.g. through the loss of visitors) whereas the benefit will be more widespread (e.g. through the provision of accommodation for workers).”

The report, available through the East Suffolk Destination Management Organisation, can be read in full in Appendix 3

ATC welcomes EDF Energy's intention to make funding available through a Tourism Fund but, at this stage, it is not clear how both the Housing and Tourism funds would work. Previous experience has demonstrated that such funds are difficult to access and are either remedial or project-driven.

ATC believes that EDF Energy should ringfence a substantial sum of money to be used exclusively for the promotion of the town prior to and throughout the entire construction process and beyond. Aldeburgh enjoys a reputation for providing a unique holiday experience – that reputation must be protected at whatever the cost.

It is vitally important that prospective visitors know the town is open for business and unaffected at all stages of construction. ATC can see no point in EDF Energy promoting the economic benefits of their proposals if they do not fully take into account and accept some responsibility for, potentially, ruining Aldeburgh's tourist industry.

[See Mitigation p.30](#)



There is a prevailing view in Aldeburgh and the immediate locality that the benefits of Sizewell C will accrue to places and businesses further afield while Aldeburgh is left with very little.

Conclusion

ATC believes that current EDF Energy plans could have a disastrous impact on the tourist-based economy in Aldeburgh and the wider area. It is essential that funds are set aside by EDF Energy to provide PR support before, during and after construction to mitigate negative public perceptions.

Cumulative impact:

One of the areas of greatest concern to ATC is the cumulative impact of two concurrent Nationally Strategic Infrastructure Projects within a few miles of the town.

The combined effect of these projects on Aldeburgh and the immediate area could, without the right management, be devastating.

ATC is at a loss to know why these projects are being independently undertaken by EDF Energy and Scottish Power Renewables..

As a matter of urgency, ATC calls on the Government to bring together EDF Energy and Scottish Power to prevent long-term damage to the local economy and landscape.

It is particularly imperative that if both projects receive development consent, they should be required to work together to minimise the environmental and economic impact on this area; should EDF Energy's project alone obtain consent, the effects could be equally damaging.

In a letter to Government Ministers including the Secretary of State for Business, Energy and Industrial Strategy, The Aldeburgh Society wrote:

"...there is an urgent need for central government to exercise policy oversight over the decisions being made by the National Grid, EDF Energy and Scottish Power. There is no real evidence of joined-up thinking by these companies and National Grid concerning the major combined threat which their proposals make to a fragile coastal and predominantly rural area that is supposed to be subject to high level landscape protection.

"The Aldeburgh Society therefore calls upon the Government to examine the development of the East Suffolk energy hub in a holistic way, in consultation with the County and District Councils, and to do this in a clear and transparent process in which all local interest groups can engage constructively."

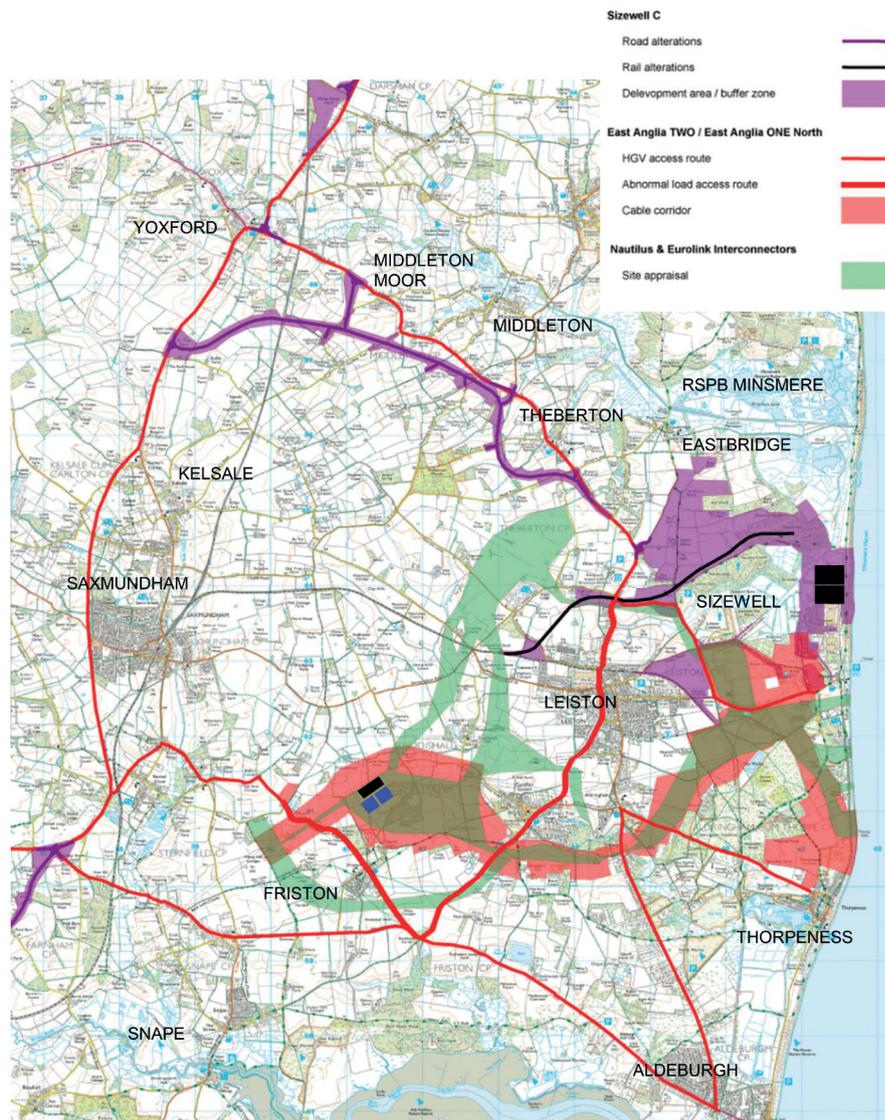


An opinion fully supported by ATC.

Furthermore, ATC believes there is insufficient information to accurately assess and comment on the negative impact of the concurrent Nationally Important Infrastructure Projects planned for this area - Sizewell C, EA2 and EA1N.

ATC takes issue with statements by Scottish Power Renewables that the cumulative effect of three NSIPs are “ not significant in environmental assessments terms.”

All three proposed plans will have a catastrophic effect on the environment and the tourist-based economy of Aldeburgh and the neighbouring communities, as illustrated in the map below.



Adapted from original courtesy of SASES (Substation Action Save East Suffolk)

Mitigation:

Should permission be given, in order to lessen the impact of EDF Energy's proposals, ATC suggests including the following mitigation measures for the life of the project:

Environmental issues:

- On-site working lights should only be in operation between 6am and 11pm. Working hours should be limited to 12 hours per day to protect dark skies, the tranquil environment and reduce the impact on wildlife. If these measures prolong the construction process, EDF Energy should reassess the suitability of the Sizewell site and relocate to brownfield land which is not in the AONB.
- Perimeter and security lighting should be skilfully designed to minimise light pollution.
- HGVs should be supervised by a banksman, eliminating the need for audible alarms.
- All vehicles visiting the site should be electric or hybrid-powered.
- Only modern, fit-for-purpose vehicles to be used in the construction process.
- The use of generators for power should be eliminated.
- A substantial amount of landscaping will be required to mitigate the loss of current natural habitat around the nuclear site. Consideration should be given to the planting of semi-mature trees to accelerate the screening process.
- For every tree taken down throughout the whole of the construction, at least two be replanted. This policy to include all road improvement measures.
- Landscaping measures to start in concert with the construction process.
- Permanent monitoring of air quality north, south and west of the site during the construction phase..



- Permanent monitoring of the underwater topography to better understand the impact of the beach landing facility on marine ecology.
- Greater engagement with local fishermen and their representatives to determine the effects of EDF Energy's plans on fish stocks..
- Compensation funds available for fishermen whose livelihoods are at risk from underwater construction.
- Provide quantifiable flood defence funds for local organisations, to ensure adequate measures are in place to counter any flood threat to communities, towns and landscapes.

People and the economy:

- Quantifiable investment in local workforce development, as part of a initiative to support the broader energy and infrastructure sectors.
- Commitment from EDF Energy and all supply chain businesses to the recruitment of local workers - those living within 45 minutes travelling distance.
- Investing in training and workforce development at the right time to minimise any negative impact of displacement in the local economy.
- Ensuring that priority is given to the recruitment of local workers into higher quality roles and young people to a Suffolk-based apprenticeship scheme.
- Contributions to vital services such as a dedicated PCSO team for the town to reduce anti-social behaviour and a dedicated response team located locally.
- Additional health care provision (GP and/or Nurse- led) at the Aldeburgh local Surgery and to fund a sustainable Minor Injuries Unit at the town's Community Hospital.
- EDF Energy to fund public transport for young people to be able to access train links at Saxmundham to attend education and for older people to remain mobile and access education and leisure.

- During the construction phase, reduced energy costs for each household and business through % discount based on radius from power station as in other parts of Europe.

Accommodation:

- Ensure there is sufficient campus accommodation to be able to include the number of workers that would otherwise stay in tourist accommodation.
- Workers campus to have its own full-qualified doctors' surgery, with counselling facilities.
- Workers campus to be located in a town, with a smaller settlement of modular housing (located on the outskirts of Leiston where the caravan park is currently proposed or at Saxmundham if D2/W north is developed) for emergency planning requirements. This could then become legacy housing.

Transport:

- All EDF Energy-controlled Park and Ride buses to be specified as low emission to reduce pollution.
- Automatic Number Plate Recognition technology to be installed on all major roads being used by EDF Energy construction vehicles. Increased parking facilities in Aldeburgh at all car parks.
- Helping local communities fund speed limits, village gateway and traffic control measures (with Welcome to Aldeburgh signs).
- 40mph buffer zones at Snape and Aldeburgh on A1094
- An upgrade to the Lowestoft – Ipswich rail line would enable workers to access jobs and provide education opportunities for students. Improved rail services would also reduce HGV traffic on local roads.
- ATC calls for more consideration to be given to a sea-led strategy for moving materials. Mitigation would be required to protect coastal



processes but such a strategy would reduce the need for road transport.

- Consideration should be given to the development of the Leiston rail line directly on to the nuclear site. This would reduce congestion and disruption on roads.

Legacy:

Large-scale infrastructure projects should provide an exemplary long-term legacy for those areas affected by construction work, attracting and encouraging new businesses and jobs.

However, ATC would also like EDF Energy to support small, subject-specific initiatives which can be delivered easily and economically.

After consultations with residents and organisations in the town, ATC believes the following projects would be of benefit to Aldeburgh and would enhance the reputation of EDF Energy as a benefactor of local good causes.

- Funds made available for the refurbishment and maintenance of the Newson Garrett-built Aldeburgh Jubilee Hall, bequeathed in perpetuity for the people of Aldeburgh as an Arts, theatre and music venue.
- Endow an annual concert season in Aldeburgh/Snape and consider the erection of a permanent bandstand on the beach for summer musical events.
- Funding of a coherent bus transport strategy, to provide a vastly-improved service for the community – the provision of new shelters to encourage bus use; circular mini-bus or other route to include villages affected and enabling those users to access train services at Darsham and Saxmundham without recourse to cars.
- Low-emission buses used to transport Sizewell C construction workers should be left to the community as a legacy gain.
- In conjunction with East Suffolk Council, donate to the costs of a parking scheme in Aldeburgh - to help counter displaced parking by Sizewell C construction workers.
- Fund electric Vehicle FAST charging points on car parks in Aldeburgh's three main car parks.



- Create off-road cycle paths from Aldeburgh to Thorpeness and northwards to Sizewell and a second off-road cycle and footpath from Aldeburgh to Snape Maltings.
- In consultation with RSPB and Suffolk Coast and Heaths, build hides for bird watchers and fund a coastal/ AONB visitor centre.
- Fund an extension and improved public facilities at Aldeburgh's Sports and Community Centre.
- A legacy fund administered by ATC to which local projects could apply direct, not modelled on the current schemes managed by EDF and SCDC SCH which are for environmental projects only.

Conclusions:

ATC warmly welcomes potential job opportunities in the town, the prospect of local businesses benefitting from inclusion in the supply chain and improvements to the road infrastructure in the area.

However, ATC is extremely concerned to ensure further important issues which could materially affect the prosperity of this world-renowned town are resolved.

Aldeburgh's fragile economy is based on tourism and EDF Energy's current proposals potentially strike at the heart of this vitally-important industry.

In the main, visitors to Aldeburgh travel by road. Public transport links are poor and the motor car is the key to Aldeburgh's continuing prosperity. EDF Energy is planning major road works during the 10-year construction cycle which will almost certainly have a major negative impact on the town's economy.

It is assumed that for a decade, unless better managed, holidaymakers, owners of homes in the town and day trippers - the people who contribute millions of pounds every year to this area - will potentially be competing with HGVs, LGVs and a myriad of assorted vehicles using roads being reconstructed by EDF Energy.

Currently, many residents, principally with young families in the town commute from Aldeburgh. It is important that outgoing traffic, as well as incoming, is not impeded. ATC is committed to encouraging the retention of a balanced community and to lose people of working age due to inability to travel satisfactorily would be a negative.

The effect on Aldeburgh could be devastating and ATC calls for far-reaching mitigation measures to demonstrate that the town is open for business as usual prior to and during the construction phase.

ATC believes that EDF Energy should ringfence substantial sums of money to be used exclusively for the promotion of the town throughout the entire construction process and beyond. Positive publicity should be generated by the appointment of niche marketing and PR consultants to advise on and implement an effective campaign to negate public perceptions that the town is inaccessible or in any way



undesirable , particularly during the construction phase, but prior to it and for some time after completion.

ATC would welcome close engagement at every stage of planning and implementation of this project as it affects the town.

ATC is deeply concerned about the siting of a 3,000-accommodation campus seven kilometres from the town which could have a major impact on Aldeburgh's existing social services, medical facilities, additional parking places and a whole host of additional issues. Though some time ago, the construction of Sizewell B created many problems for this area and memories are long.

The solution is simple. Do not impose a camp for 3,000 predominantly male workers in a rural village with a population of 1,300, mainly families and retired people. Construct it in an established urban area where there are infrastructure and support services for construction workers.

ATC is also concerned with the design of Sizewell C.

EDF Energy is currently imposing a generic design power station on an Area of Outstanding Natural Beauty and in contravention, ATC believes, of EN6 criteria. There is little doubt that it would be visible for miles, regardless of screening and mitigation.

It is essential that EDF Energy and other infrastructure projects realise that the hundreds of thousands of visitors to this part of Suffolk come to see outstanding scenery, unique wildlife and to experience peace and tranquility. They do not expect to visit an industrial park.

ATC remains concerned about the environmental impact of the Sizewell C development as it is currently planned. Considerable habitat replacement will be required to screen and soften the appearance of the nuclear site. Other environmental issues include air quality monitoring, noise and light pollution.

While EDF Energy illustrates the potential economic benefits to the area during the construction and running phase of Sizewell C. They do not provide a cost-benefit analysis covering the plant's lifespan from construction through to demolition.

It is all very well for EDF Energy to trumpet the upside of this development, but it is important that they publish ALL financial data to enable a proper scrutiny of their business model over the entire life-time of the plant

ATC remains adamant that the Government, committed as it is to NSIP energy production, should now take a lead in insisting that EDF Energy and Scottish Power Renewables work collaboratively to ensure the protection of this outstandingly beautiful area of East Suffolk.



Appendix 1

EDF Energy Relocating Sizewell B Facilities consultation

February 1 2019

Introduction:

Aldeburgh Town Council welcomes the opportunity of responding to the relocation proposal. The rationale behind this proposal is to utilise non-developed land to facilitate potential developments at the Sizewell C site. Two areas, Coronation Wood and Pillbox Field, have been identified by EDF as sites to relocate existing significant infrastructure. ATC is opposed to this proposal and believes the cumulative impact of potential demands for additional land for all major infrastructure projects in this area should be considered when determining this application.

Choice of relocation sites:

Aldeburgh Town Council disagrees with the use of greenfield sites where brownfield sites exist and questions whether this application passes the higher test required to justify this.

Currently, Coronation Wood provides valuable screening to the Sizewell A and Sizewell B Power stations which will be lost under this proposal. The wood is approximately 100 years-old and has public access via footpaths. EDF Energy justifies the utilisation of the wood by claiming it is in poor condition. If this is the case, ATC suggests the wood should be restored and the area improved as a socio-economic project, rather than turned into industrial land and lost forever as a landscape feature.

In previous proposals, EDF has always stated its commitment to sustainability and environmental protection. ATC expects that commitment to be honoured in the event of this proposal being approved, with substantial mitigation required to replace the

lost amenity. For every tree taken down, at least two should be replanted.

ATC understands that the ownership of Pillbox Field would need to be established before the utilisation of this area by EDF. Currently, this land plays a vital part in providing green space to buffer the nuclear industrial sites.

ATC believes it should be possible to relocate some of the proposed infrastructure on brownfield land reclaimed by the early decommissioning of Sizewell A power station. The Nuclear Decommissioning Agency is exploring a proposal that one or two Magnox nuclear sites in the UK should now be decommissioned continuously, considerably shortening the current care and maintenance programme. Land at the Sizewell A site could be liberated under this proposal and used to site infrastructure planned for Coronation Wood and Pillbox Field.

It should be noted that the Sizewell A site is owned by Magnox, while Sizewell B is owned by EDF Energy. ATC encourages both organisations to begin a meaningful dialogue to ensure that Sizewell A is decommissioned continuously.

Outage store, outage laydown and outage car park:

ATC questions the need for the outage store to be combined with the contractor office and mess facilities into an imposing four-storey building. If these facilities were separated, it might be possible to locate them more easily and with less visual impact. The outage laydown area covers 140 hectares, extending 1.8km inland from the coast and across the width of the AONB. The proposal is to relocate this area into the southern end of Coronation Wood, currently a valuable green field asset. ATC believes this would have a negative environmental impact and calls on EDF Energy to explore alternative sites.

Similarly, ATC disagrees with the use of Pillbox Field for outage parking for 580 cars. Reclaimed land at Sizewell A could be utilised for this purpose, with direct access to Sizewell B. Alternatively, parking could be provided away from the site to accommodate both outage personnel and, potentially, Sizewell C contractors. Such parking would be a lasting legacy for local residents. Pillar Box Field is close to the hamlet of Sizewell and is an area enjoyed by thousands of visitors each year. Any development here would further industrialise the area and would require extensive mitigation in the form of screening.



Phase 1 Technical training & visitor centre car parking, training centre and associated new western access road:

ATC believes that parking for the technical training and visitor centres should be situated on a brownfield site - reclaimed land at Sizewell A. Creating a car park for 100 cars, in addition to the 580 for outage workers, would require a great deal of land and the construction of a new western access road.

Phase 1 Training centre:

ATC contests the recommendation to build a three-storey training centre to the north end of Coronation Wood. Consideration should be given to land reclaimed from Sizewell A or a site adjacent to the new Emergency Planning Centre.

Emergency planning guidance does not require the training centre/simulation suite to be sited close to the power station and these facilities, if relocated, could service the needs of both Sizewell B and, potentially, Sizewell C. If this alternative proposal is adopted, there would be no need for an access road, greenfield land would be spared and the off-site training centre would be of benefit to the wider community in the future.

Phase 2 Sizewell power station Visitor Centre:

The relocation of the Visitor Centre to the north end of Coronation Wood would also require the construction of a new access road, something ATC believes could be avoided if the centre was located elsewhere. The Eastlands Industrial Park in Leiston, for example, could provide a new home for the centre, a site free from security restrictions and easily accessible for members of the public to visit the interactive displays.

In addition, as part of Phase 2, there appears to be a proposal to construct a further six buildings to house an outage office, projects office, outage portacabins, a base area facility, a civil workshop and a civil store area. The consultation document does not provide sufficient information to assess the impact of this proposal.

Adverse impact:

ATC understands that if planning consent for this proposal is granted, work would begin in early 2020 and last three years, with potential for noise, light and dust pollution in an area which is used for recreational purposes and contributes to the vitally-important tourism industry in Aldeburgh and East Suffolk.

Increased traffic along the B1122, involving up to 140 HGV movements a day, would have an adverse impact on residents living adjacent to the road and visitors trying to access Aldeburgh and the surrounding area.

The construction of new buildings, new access roads, car parks and laydown areas, training and visitor centres should be regarded as the industrialisation of land which is currently landscaped buffer zones between the existing stations. EDF proposals would substantially increase the footprint of the power station site to the west and south, primarily to make way for the potential new build to the north of the Sizewell B complex.

Cumulative impact:

ATC calls for greater transparency on how this proposed work will overlap with other major energy projects planned for this area. For that reason, ATC believes this application should not be determined in isolation to other Nationally Significant Infrastructure Project proposals, which include EDF, Scottish Power Renewables and the National Grid.

As the current EDF relocation proposals were not scheduled when planning permission for Sizewell B was originally granted, ATC believes the new proposals would impact on the total carbon rating of the energy produced. If approved, the plans should include an additional socio-economic package of mitigation measures and the creation of alternative green space to that which has been lost. Substantial replanting of lost trees should be the minimum requirement.



Conclusion:

Aldeburgh Town Council is taking a keen interest in this proposal because of the cumulative impact it would have on the town's fragile economy. Hundreds and thousands of people visit Aldeburgh and the surrounding area each year to enjoy the beauty of the coast and hinterland. ATC believes this proposal, together with other planned major energy projects, pose a substantial threat to the area's economy.

The coastline at Aldeburgh, Thorpeness, Sizewell and beyond would be materially and adversely affected by a number of proposed Nationally Significant Infrastructure Projects, all of which are currently pursuing narrow, individual goals. The impact of these uncoordinated projects on the area's fragile, tourism-based economy could be catastrophic.

ATC calls for a coordinated approach to ALL planning applications, including this proposal, in respect of these projects. Piecemeal development of this environmentally-sensitive area should not be allowed.

ATC encourages EDF to fully explore the opportunities of an early decommissioning programme at Sizewell A before proceeding with this proposal. There seems little point in increasing the footprint of the present nuclear site at the expense of precious green field land if a more imaginative solution is to hand.

It is the view of ATC that this application should not be determined in isolation to all other NSIP projects and should be refused at this time.

Appendix 2

Community Engagement

In order to better inform this response, ATC consulted widely throughout the community. Residents, visitors and organisations in the town were encouraged to express their views on both EDF Energy proposals and those of Scottish Power Renewables.

The consultation process for both major energy projects ran concurrently, with the response deadlines virtually identical. For many local respondents, the issues causing greatest concern were common to both Sizewell C and SPR.

ATC raised public awareness of the consultations by a number of means:

- ATC website highlighting links to both consultations.
- Large banner at the entrance to the town drawing attention to the consultation process.
- Annual Town Meeting on March 11, attended by more than 60 residents, County and District Councillors and representatives from Suffolk County Council and Suffolk Coastal District Council planning departments.
- Articles in both local magazines.
- Posters in notice boards and in prominent positions throughout the town.

In addition, members of the ATC Working Group on Infrastructure Projects visited organisations in the town to seek their views.



For example, a meeting with Aldeburgh Youth Club, 27 young people (10 to 16 years old) expressed a number of concerns, principally about the local fishing industry, the environment, the impact on wildlife of both projects and the potential increase in traffic levels. Of the six adult helpers, all but one was concerned about traffic and damage to the environment.

Town Councillors attended EDF Energy Public Information Sessions and members of the ATC Working Group met representatives from Planning Aid England and established contacts with local organisations concerned with both the Sizewell C development and SPR proposals.

In response to requests from ATC, a large number of residents emailed their views on both Sizewell C and SPR proposals. For the purposes of this response, only those views pertinent to EDF Energy have been included, with a small selection included in this document.

ATC received more than 70 email responses directly relating to Sizewell C. None supported EDF Energy plans and all were highly-critical.

“Visitors will be put off coming to the area”

The project is so enormous and in my view far too big for the setting and the land available. The construction will threaten some of the most biodiverse habitats in the Heritage Coast and indeed in the UK. This includes two sites of Special Scientific Interest and the Minsmere Reserve.

EDF Energy's plans will cut the AONB in half for at least a decade and will threaten to compromise the purposes of the AONB designation itself.

Preliminary environmental information seems to be almost non-existent in places with too much relying on work that EDF Energy has not yet reported. EDF Energy should publish its full Environmental Impact Assessment before applying for planning consent.

I believe local tourism will be badly affected. Visitors to the area will be put off returning to the coast between Aldeburgh and Southwold due to the eyesore, noise, and dust and, of course, the increased traffic on surrounding roads.

The proposed campus for 2400 workers is very close to protected areas and would be on a greenfield site close to Minsmere and next to the small hamlet of Eastbridge. This campus would bring noise, air and light pollution, a massive increase in traffic and even the possibility of anti-social behaviour in the area.

“No solution to nuclear waste disposal”

Overall demand for electricity has been falling year-on-year. It is now 18% lower than it was when Sizewell C was first proposed in a Government White Paper in 2006. At the time, it was predicted that, by now, consumption levels would be 14% higher. Increased demand was, therefore, exaggerated by 30%.

EDF Energy's balance sheet cannot cope with funding Sizewell C without external assistance. It is struggling to build Hinkley Point and has financial difficulties decommissioning elderly power stations in France.

And nobody, as yet, has provided a satisfactory solution to the problem of disposing of nuclear waste.

Sizewell C will not create many new, long-term jobs. According to the Office of National Statistics, there are currently four times as many people in the UK involved with renewable energy and six times as many delivering energy efficiency than are employed in the nuclear industry.

It is cheaper to save electricity than generate it.

“Peaceful roads will end up as rat-runs”

Disruption caused by roadworks will have a far-reaching effect beyond the local community. Visitors that are prepared to come here will have to find alternative routes, so many current peaceful roads will end up as rat runs.

How many tourists will carry on coming to Suffolk once they have experienced the reality of an area with a huge long-term development going on?



This loss of visitors is largely unknown, but, from personal experience, friends, that vividly remember the original Sizewell development have only recently started coming back to the area they once loved.

“ We need a comprehensive strategy for energy projects”

We object most strenuously to the prospect some 10 to 12 years of construction which entails some 900 to 1,500 HGV movements per day on our amenities in the town. We note that the proposals as presently out for consultation are not specific enough, do not reference the impact of the SPR developments to be carried out concurrently and seem to ignore the marine-led strategy discussed in earlier phases.

The plans call for the employment of over 5,600 workers during construction, further increasing traffic on the local roads throughout the day. The impact of the housing needs for that number seems not been thought through, and we are deeply worried about what effect the influx of such a large number of people would have on our already severely depleted public services such as the NHS, police and emergency services. The negative impact such numbers would have on tourism and the environment in Aldeburgh would likely be devastating.

We object strenuously to the piecemeal approach to energy infrastructure development being adopted by the EDF Energy and Scottish Power Renewables who are also consulting on their Proposed East Anglia One North and East Anglia Two wind farms off our coast.

We cannot emphasise strongly enough how imperative it is for a comprehensive strategy for all energy projects to be adopted to stop each development being considered in this piecemeal way.

“Consultation process completely inadequate”

EDF'S consultation process and the details provided, have been completely inadequate. The lack of an Environmental Impact Survey at this stage is ridiculous. The impacts will be huge and enduring and the fact that the RSPB has said that it cannot respond adequately should be a key consideration.

Given the whole development is to take place in an AONB which has been legally reserved for wildlife and recreation, means that this land should be left untouched particularly as there are alternative locations within the UK for a power station.

EDF has not sufficiently justified the locating of the workers, campus on a green field site with no amenities close by. There has been much local objection to these proposals at every stage of the consultation process but EDF continue to ignore local views which makes a mockery of asking for local opinion. This lack of regard is evident in so many aspects of the project.

“Shortage of holiday homes to rent”

The area is very dependent on tourists, with 10-12 years of construction, high volumes of traffic and 5,600 workers in the area, the high-end tourism that the town depends on will be put off and go elsewhere. Visitors are likely to use social media to tell their friends that the tranquillity they come for has been disturbed.

Most of the shops and restaurants in Aldeburgh High Street appeal to tourists that are happy to spend money. It is unlikely that the construction workers would bring the same level of spend to the High Street, so Aldeburgh would slide into the sad state of so many coastal towns.

Tourists that do want to come will find it hard to rent holiday homes because 1,500 Sizewell workers will also be looking to rent locally. If tourists can't find somewhere to stay they will go elsewhere.

I would also like to say that having the EDF and Scottish Power consultations running at the same time has been confusing and unhelpful for everyone. Either it has been badly planned or is a deliberate policy to confuse potential respondents to the consultation.



“Nuclear strategy in tatters”

The government's nuclear strategy is in tatters. Hinkley Point is far too expensive. Wylfa has been abandoned. Sizewell C and D are untested, have no financial security and have an unreliable Chinese partner.

We should pause for 10 years to see how the renewable revolution turns out in practice.

EDF have made wholly inadequate infrastructure plans. Sea and rail have been effectively abandoned and the road network will not be able to cope (despite EDF's tinkering). The proposals for housing and moving the construction workers are completely inadequate.

Time to abandon the proposal before more time and effort are wasted.

“Time to think again”

Mad: *It will be obsolete before it is finished in 10 - 12 years. Is there a nuclear plant of this design actually up and running?*

Bad: *Vandalism on a colossal scale, combined with the planned SPR substations, in a particularly precious part of this region with supposedly AONB protection.*

Dangerous: *Building on this scale on an unstable sinking shoreline is dangerous. . Think again.*

All letters and emails sent to Aldeburgh Town Council have been forwarded to EDF Energy as part of this consultation.

Appendix 3

Supplementary Responses

The following responses from organisations in Aldeburgh have been submitted to EDF Energy. ATC requires EDF to read these responses in conjunction with that of Aldeburgh Town Council, which fully endorses the views expressed.

THE ALDEBURGH SOCIETY:

The Aldeburgh Society, as a civic society, has reviewed your stage 3 public consultation in relation to the proposal to build new nuclear power stations Sizewell C and D in the Area of Outstanding Natural Beauty just up the coast from our historic town.

We object strenuously to the piecemeal approach to energy infrastructure development being adopted by you and Scottish Power Renewables who are consulting at this very same time on the Proposed East Anglia One North and East Anglia Two wind farms off our coast.

The effect of both projects going ahead together would result in up to 12 years of major construction work on our heritage coast in the AONB. This is clearly unacceptable and we have called on central government to examine the development of the East Suffolk energy hub in a holistic way in consultation with the local councils.

In relation to this Sizewell C and D consultation, we are profoundly worried about specific aspects of the proposals and repeat that we object to both the SPR and EDF Energy developments being allowed to proceed together.

IN PARTICULAR:

- We object most strenuously to the prospect of over 10 years of construction with resulting unsupportable volumes of construction traffic, which will indirectly impact Aldeburgh and affect civic amenities in the town. We note that the proposals as presently out for consultation are



not specific enough, do not reference the impact of the SPR developments to be carried out concurrently and seem to ignore the marine led - strategy discussed in earlier phases.

- The plans call for the employment of over 5,600 workers during construction. The impact of the housing needs for that number have not been thought through, and we are deeply worried about what effect the influx of such a large number of people would have on our already severely depleted public services such as the NHS and the police. The negative impact such numbers would have on tourism and the environment in Aldeburgh could be devastating.
- The Society remains very concerned that the proposals would have a substantial damaging impact on the natural environment in an AONB.
- Finally, we cannot emphasise strongly enough how imperative it is for a comprehensive strategy for all energy projects to be adopted to stop each development being considered in this piecemeal way. The combined projects are likely to have a considerable adverse impact on the communities, environment and businesses in the area and on Aldeburgh in particular.

ALDEBURGH BUSINESS ASSOCIATION:

Following a meeting of Aldeburgh Business Association on 6 March 2019, the majority of attendees voted in favour of raising the following concerns regarding the development of Sizewell C by EDF Energy.

THE ALDEBURGH 'BRAND':

While members could see some benefits due to training and employment opportunities locally, the majority felt significant concerns about damage to the Aldeburgh brand. The East Suffolk Tourism strategy states that visitors are attracted to the area by the character, culture, food, clean beaches and spectacular coastline, the outstanding countryside and wildlife of the area and that tourism brought £590m to the area and accounted for 13% of all employment in 2015.

Many of the ABA businesses depend on tourism. With 10-12 years of construction, high volumes of traffic and 5,600 workers in the area (at peak), the members agreed that the high-end tourism that the town depends on would be put off and go elsewhere. Visitors are likely to use social media to tell their friends that the tranquillity they come for has been disturbed.

ALDEBURGH HIGH STREET:

The second issue relates to our successful High Street. Most of the shops and restaurants in the High Street appeal to tourism that is happy to spend money - members thought it unlikely that the construction workers would bring the same level of spend to the High Street. One shop owner said: "Increased traffic will deter our visitors and have a very detrimental effect on our business. Over a 10-year period, we may not survive."

ACCOMMODATION:

The third issue concerns staff accommodation. Many of the staff in the hotels, shops and restaurants rent locally and are on modest wages. EDF Energy anticipates that 1,500 Sizewell workers will also be looking to rent locally with an allowance of £35 per night – squeezing out local staff.

Members also fear that tourists will not be able to find available accommodation so will go elsewhere. EDF Energy claim that the overnight allowance will prevent workers from taking holiday accommodation but members felt that workers would club together to take available accommodation. This would also change the flavour of what is currently a quiet town which appeals to families.

OTHER ISSUES:

Everyone agreed that having the EDF and Scottish Power consultations running at the same time was confusing and unhelpful for businesses, residents and visitors.



ATC full endorses the responses of the following organisations:

SUFFOLK COAST AND HEATHS AREA OF OUTSTANDING NATURAL BEAUTY:

www.suffolkcoastandheaths.org/

SUFFOLK PRESERVATION SOCIETY:

www.suffolksociety.org/suffolk-coastal

SUFFOLK COUNTY COUNCIL/SUFFOLK COASTAL DISTRICT COUNCIL:

[www.committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(12-03-2019\),%20The%20Cabinet](http://www.committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(12-03-2019),%20The%20Cabinet)

To be considered post-response deadline:

EAST SUFFOLK DESTINATION MANAGEMENT ORGANISATION:

The DMO is currently conducting a major survey of businesses, residents and visitors to East Suffolk, recording views on the proposed infrastructure projects involving EDF Energy and SPR. The results of that survey will not be released until after April 4 2019, too late to be included in this response. However, ATC gives notice that it will be submitting to SPR a separate Appendix based on the findings of the DMO after April 4.



Aldeburgh Town Council

March 2019

Contact Aldeburgh Town Council by either writing to the Town Clerk at;

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Market Cross Place
Aldeburgh, Suffolk IP15 5DS

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