

Sizewell C: a further public consultation by EDF 18 November to 18 December 2020

EDF Fourth Consultation: additional transport and coastal proposals.

Response from the Alde and Ore Association.

The Alde and Ore Association is a charity, with some 2000 members, which aims to preserve and protect the Alde and Ore Estuary for the benefit of the public to enjoy.

The Association addresses only the proposed structural changes affecting the coast line.

Summary: Nothing in these latest proposals allays the Association's basic concern that the long term existence of Sizewell C will interrupt natural coastal processes and lead to damaging the coast further south, including to the detriment of Aldeburgh and the long natural Orfordness shingle spit protecting the Estuary. If anything they add to the concerns.

Detail:

The proposals involve extending the proposed Beach Landing Facility, a new temporary beach landing facility, for which four options are given, changes to the Hard Core Defence Feature which will defend the two SZC plants from the sea and flooding and new plans for a temporary storm water outfall on the beach. These plans have consequences for the earlier proposals envisaged for shoreline protection by shingle recycling.

These proposals are not an appropriate basis for a real consultation. The consultation document admits that they involve new ideas on which there is further work to be done to assess whether or not the impact on coastal processes and sediment movements will have significant effects. The statement in the document that despite further work being needed, the impact of the proposals will be insignificant cannot be sustainable as there is no evidence offered as to why that is the case.

The Hard Core Defence Feature: The design of the Hard Core Defence Feature was incomplete in the last consultation, so assessment of its impact on coastal processes was not possible. Adjustments have been made to that proposal making it apparently 3.8m higher and extending a further 8 metres seaward, but the small-scale diagrams do not make clearer what the design may be. Sheet piled walls have only a limited life but the whole structure will be in place for over 100 years. The structure will be more intrusive into the rapidly shifting coastline and the document acknowledges that will require more shingle recycling at an earlier date - that point again itself showing that there will be an even more significant impact on the coast than the impact of the earlier consultation proposals on the coast.

The Permanent Beach Landing Facility would be extended by 30 metres and would be used for major exceptional deliveries. The impact of this is not clear but may be less than that for the HCDF.

The Temporary Beach Landing Facility proposal provides for four options but even those are still liable to change: for example Option 4 - if it were to be essentially a floating platform it would have less impact on the sea bed despite its size, but if, as could still happen, it was decided to make it fixed installation, given its size the impact on coastal flows could be serious. This cannot be a proper consultation as the questions asked are requiring answers to a moving target.

Temporary Storm Water Outfall This is a new addition. The proposals are inadequate in that the actual placing on the beach is uncertain, as are the considerations as to its impact on the beach profile and possible problems for walkers.

Need for remedial action on the shoreline adjacent to the power plant. The fact that the consultation document accepts that the new proposals would require earlier **remedial action** to deal with erosion and long shore drift than under the previous plan, probably by 2050, is welcome but that is where that recognition ends.

The real point is the potential impact. The consultation does little to attempt to clarify that and so is inadequate. It can be inferred that the earlier date of the structure starting to protrude from the coastline could mean earlier and more build-up of sediment north of Sizewell. The plans remain silent on what happens to the south: the original proposals made the sweeping assumption that coastal processes within the Greater Sizewell Bay will stay within that area and that there will not be any implications to the south, still remains to be demonstrated with evidence. This assertion remains strange given the long evolution of the dynamic Suffolk coast, even from Dunwich to Shingle Street, and the fact that the ness of Thorpeness itself, at the southern end of the Sizewell Bay, has moved south in recent years. There is nothing in any of the proposals to date, including this latest fourth round, which gives any confidence that there has been any proper consideration of the potential damage to this dynamic coastline arising from the disturbance that will be caused by the construction of Sizewell C and which could have substantial adverse consequences for the shoreline of the settlements and Orfordness to the south of the Sizewell area.

One further consideration to be drawn from these shifting proposals is that **the need for a future monitoring and mitigation plan has been emphasised, yet again.** The existence of such a plan, if Sizewell is allowed to be built, will be vital to ensure changes to the coast caused by the existence of SZC, as opposed to natural coastal evolution, are addressed and mitigation put in place. The need for a legally binding, well governed structure which will be properly funded is firmly re-emphasised here. It is fundamental that such effective arrangements are in place for the entire life of the project, including the eventual decommissioning and removal phases.

Conclusion: The lack of transparency about what is planned, when the impact could be detrimental to our coast, was and remains unacceptable. A consultation on which it is not possible to form a view but only to express concerns is not a real consultation.

From the Alde and Ore Association Trustees

18 Dec 2020

•email comments to info@sizewellc.co.uk;