

Response to EDFE Sizewell C Stage 3 Consultation

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INTRODUCTION

The observations in this consultation response are based mainly on Chapters 1,2 & 3 of Volume 1 in the full Stage 3 Report, with additional specific comments on Questions 1, 2 & 15.

There are four areas of principled concern:

- 1 The suitability of the project for the site and the amenity of host communities
- 2 The necessity/relevance of the project
- 3 The sustainability of the project, including legacy values for the impacted communities
- 4 Consultation standard & public interests

Drawing on these, we present arguments and recommendations about the consultation process and the energy policy context of the project, about the project's economic legacy values and, thirdly, about the overall approach to nature protection duties revealed in the Stage 3 Report. We argue overall that a comprehensive and final Stage 4 consultation is needed to fulfil EDFE's duties of consultation.

Arguments and comments are informed by our understanding of current and cumulative policy, regulatory, statutory and policy dimensions of the project, informed by the Hinkley Point C planning experience and its construction impacts to date.

There are still many basic questions, reflecting the frequent absence of plausible information. We record some of them here, rejecting the frequent answers from EDFE representatives, underlining the Report itself, that "talks are ongoing with XYZ interested parties". Pressed, resort is found to the defence of "commercial confidentiality" which we believe is inappropriate for almost all matters of statutory consultation. It is thought in the community that None Disclosure Agreements have been employed. At this formal stage of consultation, we cannot think that these can be binding and in any case bind only those who have agreed to them.

We nevertheless welcome the fact that EDFE have chosen to consult at Stage 3 about the whole site, the overall project and about the consultation process itself. We think this latter area reflects duties under the principles of the Aarhus Convention.

The overriding principle behind our approach is sustainability, the corpus of regulatory standards and duties revised and updated in the Government's current and ongoing rewriting of the nuclear siting NPS EN6 (National Policy Statement). This doctrine of sustainability takes on numerous forms, not all of them fully developed in the revision of NPS EN6. Notwithstanding this reservation, we are especially interested in the whole life span and whole project context principles and public rights to relevant information on impacts.

Our approach suggests important challenges in three areas, namely consultation shortcomings, wholelife project sustainability and assessment of the full nature asset involved. More specific comments are developed in line with the Questionnaire.

1 Stage 3 Consultation deficiencies and timing require a Stage 4 Consultation

The Stage 3 Report fails to accord with statutory/regulatory duties, not least because the information provided to enable proper views to be arrived at is woefully absent or inadequate. As other consultees are saying, there are more questions than answers, even more so than at Stage 2, when our local authorities concluded that on the balance of considerations, the negatives outweighed the positives. We cannot see how Stage 3 has altered this balance, while the informational deficit has increased substantially.

We have in mind questions about potable water supplies, geographical sourcing of construction materials, other supply chains, labour force supplies, National Grid configuration, coastal erosion and sea wall protection, nuclear waste storage, funding and ownership, and compensation regimes. These are just some of the issues which have arisen over the six years or so of consultation.

A major infrastructure project of this kind cannot be consulted about with headline proposals and questions expressed in simple terms of general views without proper informational back-up (project funding and costs, for example) while binary choices on specific mitigatory options lack credibility, relevance and/or necessity (the Yoxford P&R and roundabout might not have been required if a comprehensive new link road had been proposed). Nor can statutory consultees and substantial interested parties - water companies, farmers, logistics companies, tourism businesses - be the sole parties to raise and pursue all of the broad issues: there are issues which arise for the communities and interests impacted. Potable water shortage, recently declared as a serious policy issue in an Environment Agency futures report, is a public matter but EDFE's likely massive needs are not acknowledged, showing no understanding of likely impact. Equally negligent, we believe, the issues do not form part of either Anglian Water's or Northern Water's corporate/publically declared future plans. We ask simply if reported "talks" by EDFE are actually taking place meaningfully with these strategic service providers, why cannot the be public be told ? When will we, ordinary dependent water consumers, be told ? If the answer is, again, commercial confidentiality and trusted reference to the Environment Agency, we have to say that, in our view and maybe the view of law courts, that may not meet Aarhus standards. Nor satisfy commercially interested parties in the obviously water dependant farming and tourism industries.

We are also mindful of announcements to the Sizewell C Forum about the production of a Business Case for the project, an Environment statement, and, expressly at 2018's SZC Forum, some "mini consultations" on compensation for impacts on the housing market and tourism and some public services. This Forum, which announced the date for the Stage 3 consultation, gave the firm impression that these matters would be made public: they would not be simply matters for the company and the DCO process.

We also look forward to EDFE's statutory Consultation Report, and comment about how this process has been conducted and how at Stage 3 the substances of consultees' views might be recorded and made available to Planning Inspectors. EDFE has itself egged up expectations of a high level of consultation: the reality is that, at Stage 3, we are now in some important respects back at square one and certainly in an informational vacuum.

Disappointment that a full and transparent consultation has not been produced, will, we think, result in extra special attention being paid to the Consultation Report if it fails to record the many unresolved issues raised by a wide range of consultees.

We therefore believe there is a strong case, on numerous grounds, for a comprehensive and final Stage 4 Report to be produced which responds to questions about comprehensive lifetime suitability of the site, its economics and funding and relation to current energy policy, its sustainability, its legacy values and its adequacy of consultation. Transparency and professionally informed reasoning about mitigatory and compensatory provisions should also be pursued in a final Stage 4, especially on nature issues, with due process of alternatives being considered under the aegis of the precautionary principle. We fear shirt-cuts and pragmatic approaches to nature protection issues, but await developments after the reversion to PEI stage.

The reversion to PEI (Preliminary Environmental Information) status for the EIA (Environment Impact Assessment) process has been, frankly, alarming. The substantial absence of data and assessments recorded in SCC and SCDC(SE)s' responses at Stage 2 and Stage 3 are equally concerning. But there is also the important matter of consultation timing to be taken into account. This concerns the parallel process of public policy review: Government's (BEIS) revision of the nuclear siting National Policy Statement EN6 involves an explicit programme of talks with developers. It is strange that these talks might still be ongoing when EDFE has told Suffolk communities that it has finished its consultation and will submit a DCO (Development Consent Order). It would be a matter of serious concern if matters raised in these private discussions with Government turned out to be different to those disclosed to the public and involved communities and interests.

We further observe that the EN6 revision process involves an as yet unspecified public consultation on the policy outcomes of the review. As EN6 revised draft proposals explain, this review has been required by changes in policy and law since the original EN6 of 2011/2. The EN6 review is also declared to be freestanding of EN1, the energy policy NPS. So it is not entirely surprising that the EN6 review is running in parallel with the production of a new Energy White Paper promised for the summer of 2019. We hasten to point out that this can be assumed to impact on EDFE's project.

There is more relevant detail in the EN6 review narrative: there is a new nuclear construction time frame, and the contractual position of nuclear developers appears to have changed from nominated/designated contractor to commercial project proposer. As we understand this shift, the burden of proof about this whole project now passes to EDFE, in place of the previous strategic planning assumption in its favour.

Nor is the framework of nuclear's contribution to the UK energy mix the same: it has changed substantially. The delivery of 7 out of 8 new nuclear power stations decided in 2011/2 was required by a policy of nuclear expansion. This changed in 2016 from a nuclear expansion policy to a nuclear replacement policy, commonly understood to mean a reduction from a future target of 50% nuclear supply to an approximate 20% nuclear contribution. EDFE's assertion in Chapter 1, Volume I of the Stage 3 Report that there is an "urgent need" for Sizewell C does not, therefore, appear to accord with public policy in several respects. It needs to argue its case, not simply assert it, and its assertion jumps the policy gun in any case.

Finally, we draw attention to the persistent assertion by EDFE representatives that the "urgent need" is for "baseload" electricity at Sizewell C to fill an energy gap in the mid 2030s. We suggest that this is an increasingly questionable assumption. A whole-life future for nuclear baseload technology is by no means a self-evident proposition. Other countries, including France as the home of EDFE's parent, are planning for a 5th generation flexible nuclear different to the baseload engineering and very long-life EPR model proposed for Sizewell. Further, should Sizewell C go ahead, it may well be last EPR ever commissioned. China's one EPR built with EDF is being followed by China's own designs both within China and notably at

Bradwell in the UK. The UK government has recently declared itself as promoting flexible mini-nuclear technology.

2 The negative impact of the project over its lifetime would be game-changing for Suffolk: the negative impact is seriously underestimated, a blight, not a blessing

We raise here an essential but little visited question about the overall provenance and economic value of the project, apart from energy policy considerations. These feature strongly in both national and local planning considerations, and have been addressed in a summary fashion by the Stage 3 Report. We sense that an early positive valuation has changed and matured, in part in the light of experience with Sizewell A and B, to a different position within the area's political economy. From being a promise economically, it is being viewed as a problem. This change is reflected in the many well-rehearsed nature, amenity and transport assessments which, we believe, also show that the likely impacts will be game-changing for East Suffolk and of substantial negative impact for Suffolk as a whole. Our concern is not to repeat these, but to look at the economic case for the project overall as a matter of sustainability for East Suffolk and contributor to national energy policy.

Energy technology and policy developments beyond anyone's control have played a decisive role. There is an unquestionable transition nationally and internationally away from big base-load nuclear regime, not simply on cost grounds. We observe that many determining factors - climate change assessments, offshore wind capacities and costs, intensifying energy market competition developments, regional and cross national interconnectors - have moved faster than expected at the time of the UK's 011/2 Energy NPSs. There is no authoritative voice which sees this pace of energy technology change reducing.

The promise to problem transitional narrative can be, and is, being argued in the community. It apparently entered consideration by SCC and SE who at Stage 1 & 2 assumed "in principle" support both for local/regional reasons and in line with a sense of national duty. Sizewell's C's raison d'etre can now be seen as on the line, if it is not already yesterday's prospect.

There are also now two economic puzzles at the heart of this project: the first is how such a vast project, variously promoted as a £16 billion investment, can reduce its costs by 20%, as required by Government policy ?

At this stage, the question itself is important enough. Existing grid access and transferring labour released from Hinkley Point C might maybe make marginal contributions to investment efficiency, but the optimism of EDFE's confident announcements is not shared. Indeed, setting aside the unquestionable record of major cost and time overruns for big nuclear projects, it beggars belief that a Government required 20% cut in costs for SZC cannot impact on issues of safety, security, engineering quality and the funding of externalities. European Commission examination of the Hinkley project's costs and financing, expressed in the agreement for a CFD of £92.50, inflation proofed for 35 years at a notional return on capital of 9.5% could be regarded as an underfunding, not an excessive subsidy, if HPC were to be able to meet its full lifetime and decommissioning costs. The facts of open energy markets are that even governments cannot fully guarantee a future for currently proposed nuclear projects. Hence the collapses of the Toshiba and Hitachi projects despite in principle support not only by the UK Government but also the Japanese and Korean authorities. A big burden of commercial viability proof lies at EDFE's door about SZC: the financial case should be a public matter, another argument for a comprehensive Stage 4. We comment below on the RAB (Regulated Asset Base) funding model vaunted for SZC and other projects.

It needs to be added that the precise meaning of the Government's 20% cost production for SZC is not at all clear. It has been taken by EDFE to mean capital cost reduction, i.e. a headline build cost of say £14 not the expected minimum of £16 to £18bn. If this is how it is seen by EDFE, perhaps that is why the nuclear waste storage facilities are only double the capacity of those for the much, much smaller Sizewell B, and why a sea delivery pier has been rejected by EDFE on grounds of coastal disturbance and ecology, though commentators believe it is a cost issue. There is another pressure too: Government's forthcoming White Paper is expected to deal with pricing matters (CFDs - Contracts for Difference price guarantees), and it is fair to assume that this means that HPC's £92.50 MWH price will be proportionately lower for SZC, rather than being marginally adjusted as originally intended. If, on the other hand, there is no intention to cut the CFD level significantly for SZC, EDFE would be being guaranteed a profit rate for SZC well above the contractually assumed 9.5% of HPC. That should have meant investors banging on Sizewell's doors. It does not seem to be the case. Nor does it look as though EDF as the parent company has enough of its own capital to remain a majority/controlling interest in the project.

Secondly, how can it be sustained that such a vastly expensive project will apparently yield such low & modest annual net values for the local economy? EDFE has declared net economic values of the order £100m per annum during construction, and £40 million thereafter, with a possible aim of improving the first period's £100m to £200m. At expenditure per year and a (simplified) annual cost/expenditure of £1bn per annum, it would contribute 10% to the local economy, and 4% after construction. Employing 6,000 workforce on an average annual wage of £30,000, the maximum claimed net value roughly equals the wage spend locally. This is solely an indicative arithmetic: what it suggests is that 90% of the economic value of the project does not come to the local economy, and further, since EDFE's figures are "net" that the costs to the local economy must be substantial. The burden of proof lies with the project, but all we have is the assertion of some rough figures.

An explanation of a small yield to the local economy and possibly high cost is obvious: it is that big nuclear power stations, normally sited in geographically and economically isolated areas - not Suffolk's case - blight areas for any other economic development. A small workforce may be employed in the long years of operation, but the downside is that the local economy is frozen.

A further reflection about this project concerns its contribution to local tax revenues, a matter of considerable importance for local authorities enduring long years of austerity funding. The question matters above and beyond Section 106 payments by a developer for local costs. Over the maybe 15 years of construction, who will repair the roads which are already under severe pressure?

We raise these questions because we believe that while local benefit from nationally required infrastructure of this particular kind can be very low, what has tipped the balance has been the notion of national need and benefit. With this now in such doubt - for varied reasons - for big base-load nuclear energy, the lack of national gain will, we fear, translate into a generalised local pain, wider than the obviously very great impact on tourism and agriculture. How economic blight has been factored in to the legacy net economic values by EDFE is a question which communities are asking, above and beyond impacts on nature assets and tourism. When participants in consultation meetings say "We've surely done enough already with Sizewell A and B" we think they are recording their experience of blight. Long term economic blight is not, we suggest, in any sense "sustainable".

A full and consulted about economic impact study is necessary. It should be at the heart of a Stage 4 consultation.

3 The impact zone's overall nature assets are at a dynamic crossroad, above and beyond specific site and species HRA's (Habitat Regulation Assessment)

The sustainability principle for nature assets needs to be recognised as requiring more than established HRA methods of impact assessment. At Stage 1, EDFE's Environment Report sought to limit nature assets to immediate questions at the partial land-take on the Sizewell Marshes SSSI (Site of Special Scientific Interest), regarding any impact on Minsmere's RSPB site as a separate matter. Sadly, such a limited approach appears to still be in place for the reference in Volume 1 of the Stage 3 Report to bats, water voles and otters being provided with a culvert and transition ledge under the permanent access causeway to the "C" site. And, further, the intention of counting Aldhurst Farm's transformation as a balancing bio-diversity contribution to otherwise unspecified nature damage.

We recognise that these specific references should be included and hopefully revised in the promised full nature and environment impact studies. This reversion to PEI mapping status has occurred despite frequent claims of much work in progress. As are likely to be many other consultees, we are curious about the reasons for this reversion. In and of itself this is such a strategic area of overall site impact study and sustainability duty that it surely must result in a very substantial further consultation. It would make a major section of the Stage 4 exercise which we believe is also necessary on other grounds.

Further, we believe the nature assessment should be based on a dynamic baseline of secular nature decline in the UK and the EDFE's likely impact on the species populations within the designated impact zones as well as within the registered assets of the 54 variously protected nature sites in the zone. The impact of the likely 15 year construction period, with its 32 hectare site and 100 + hectare supporting site and transport networks and associated developments across the whole area should be assessed in a comprehensive impact framework. Here we refer to the panning conditions agreed for Hinkley Point C's selected nature assets. The bats were to be provided with new hedges around the construction site to voyage themselves away from threats, crossing over transportation gaps. No consideration was given to lighting and noise effects: forced migration was the "mitigation". We ask if the bats are still present. And are molluscs in the beach thriving with the modest start up and slow down provisions of the decision about piling on the beaches ? And who monitors the mitigation conditions ? We suggest that Suffolk's nature assets and supporting communities shouldn't and won't accept such cavalier approaches. High level case law has developed, we believe, which for example confirms that protected bird species which are present in and around major infrastructure construction sites have their rights to protection, while in general species covered by strategic sustainability assessment cannot suffer mitigation and compensation by reference to general populations.

QUESTION 1 -The Proposals

Question 1 Overall Proposal

The EPR is a largely unproven design technology, rejected by China for its own development, for its collaboration with EDFE at Bradwell and France's EDF for its own energy transition in favour of a modified but as yet unknown version or alternative. It has proven difficult to build (time overruns) and expensive, and faces at Sizewell a 20% cost reduction to qualify for subsidy support, a hardly believable cost cutting without design integrity and/or safety being compromised. We suggest that the reactor design is unsuitable, and uncertain funding casts serious doubts on its proper construction.

The size and longevity of the project - 15 years likely build, 60 years operation- will dominate Suffolk East's economy and block other economic development posing problems for local authorities, likely to contribute very little to the local economy given technologically driven outsourcing during the build, and dependency on high-tech skilling for its operation not available from the local population.

Parent company EDF's severe funding problems mean that SZC will come under outside investor control, already mooted to be dominated by the current minority partner, China's nuclear company CGN.

There are questions which should be publically examined about the capacity of the UK's awkwardly configured national grid's ability on its Eastern circuits to accommodate the huge potential supplies of offshore wind and market supplies from continental interconnectors. Further, the "mid 2030s energy gap for nuclear baseload electricity" thesis advanced by EDFE is questionable on several grounds. In addition to our comments above, we believe the existing capacity market regime could be expanded to cope with fluctuating supply alongside imported European electricity, and that SZC's operating prices, with any foreseeable CFD, will be out of line with market supplies for its inflexible base-load product designed for 60 years operation.

SZC's geo-economic position is also quite different to HPC's in the West Country. SZC would have no natural regional monopoly, with Bradwell looking certain and competitive, offshore wind due to double in scale from its already licensed volumes, and big scale interconnectors. The case could arise that even Sizewell B's currently competitive product might come under pressure as it moves towards its maturity date in the early 2030s.

The discussion about a RAB (Regulated Asset Base) funding approach for new nuclear awaits Government formulation. For the moment, it is fair to observe that redeemable bond funding for a natural monopoly sewage pipeline under the Thames taking 4 years to bid and having a guaranteed monopoly (market) for its lifetime is a very different proposition for pension funds to SZC.

Part of the business issue will be whether EDFE can afford to insure our local authorities through a comprehensive and reviewable Section 106 agreement against excessive road damage, additional social services and blue light services costs for the long build period. Equally, can it afford longstanding assistance and compensation at appropriate scale for impacts on tourism and housing in particular, and attributable local business failures.

These economic uncertainties suggest that the business case for SZC should be up for public scrutiny before any DCO application. A comprehensive Stage 4 would be the obvious vehicle.

Question 2 Main Development Site

There are many issues here, evident from questioning by both ordinary and qualified consultees.

- Is the site big enough for two big reactors and hazard security management ? The EN6 under review assumes 30 hectares per reactor, not the actual 32 hectares for 2 reactors.
- The sea wall defence is set at 10 metres, and coastal flooding is envisaged from climate change and sea level rises possibly eventually encircling the site. Sizewell B's sea wall defence, with the nuclear dry store in the old A site, is a little over 6 metres high. Why is the entire site (as required by the new EN6) not also secured to 10 metres ?
- The site has already crept out towards the sea to accommodate an access causeway from the MLF (marine landing facility). It has been observed that the granite

infrastructure supporting and defending the internal perimeter barrier of the site may not be deep enough or wide enough to stop beach erosion undermining it.

- We have already mentioned potable and cement grade water supply issues: senior engineers asked during site visits about this explained that they did not know anything other than assuming that talks were taking place. We think, as argued above, that this is a public issue given foreseeable water shortage in the area, and cannot properly be left solely to regulatory decision by the Environment Agency.
- We note publicity about the quantum of materials needed for EPR construction as equivalent to "filling Wembley Stadium". Public concern about impacts from its transport, sourcing, storage and use is understandable. Material sourcing questions are being systematically avoided by EDFE representatives. Despite this, special aggregate sourcing from the West Country and/or France has surfaced. This raises questions about the suitability of the A12 both within Suffolk north of Ipswich and Felixstowe, and about the Orwell Bridge's loading and the A12 south of Ipswich. Environment impact zones reaching about 20 kms from the site are not an adequate study base.
- The creation of the nature mitigation parkland at Aldhurst Farm was justified by its being low grade farmland. Since there is other similar land in the vicinity, why has the construction site and access road not been configured to avoid as much as feasible the SSSI? The Aldhurst Farm land could have been used within the construction site.
- What is the need for some 1000 parking places within the construction site, apparently not for HGVs which will pass through? This provision casts doubt on the Park & Ride's ability to keep traffic levels down.
- The dry store for nuclear waste on site is only double the capacity of the dry store for Sizewell B, which is designed for maybe another 20 years' waste from a single and much smaller reactor. This looks to be a substantial shortfall of capacity, especially since Government has no current or foreseeable prospect of creating a permanent nuclear waste store for the nation.
- Connectivity to the national grid for this huge dual reactor power station has been assumed to be unproblematic, and indeed, a cost reducing asset in comparison to Hinkley C. It is generally assumed that existing pylons can simply be given extra power lines. We question whether this is correct, given that the offshore wind farms and interconnectors of the Energy Gateway will need grid access too. The SPR (Scottish Power Renewables) buried cable nearby is for a small part of the potential wind farm cluster and unlikely to be copied. Concern has been raised about EDFE's proposed tall new pylons from "C" but no clear explanation offered. Are there still national grid issues to be settled?

Questions 6-14 Transport issues

We endorse the call by local authorities for the release of the modelling assumptions of the VISUM studies. Realistic baseline assumptions for traffic modelling must start from the poor quality, pragmatically adjusted, poorly maintained, hazardous A12 which is facing huge future stresses from forced housing development, mainly for commuters and associated commercial service development. The impact of 44 ton HGVs would change the character of the overall traffic cohort for the A12 while seeking to meet production flow needs on site, shift working patterns and integration with both directly involved non HGV traffic and associated traffic suggests that EDFE's traffic and roads mitigations are implausible. A reasonable multiplier (1:1 minimum) for indirectly generated traffic from a doubling of the population of the Leiston area, plus resident population strategies for avoiding traffic challenges, suggests that a road based dependency for this project is simply not credible. The combined impact of normal traffic growth with direct EDFE traffic plus indirectly generated EDFE traffic suggests a traffic crisis for Suffolk.

We doubt the reasoning for the rejection of a sea based supply facility, but note that it would be comforting to think that the seabed disturbance reasoning for this would be applied to other coastal and mature protection issues.

We do not believe that the full rail freight strategy is feasible in terms of either cost or timing. Nor can we see any legacy value.

Question 15 Consultation

Stage 3 has been rushed, for reasons we can only guess at. Most likely might be the NPS EN6 revision process establishing new sustainability criteria for nuclear sites, and adjusting to changes in energy policy and law.

There is no basis for this Stage 3 to be regarded as adequate to proceed to a DCO. It raises even more questions than existed at Stage 2, while the few specific mitigations proposed, exclusively for traffic challenges, have generally been greeted with scepticism and hostility, and rightly so in our view.

Our submission has sought to probe EDFE's case and arguments, to compensate for their routine refusal to openly debate issues. While some debate has taken place where communities have demanded it, it needs to be noted that EDFE have, for example, refused to debate in front of school audiences, limiting themselves to presentations. Their version of public consultation has been to present limited and superficially plausible information and only sketchy proposals where public pressure has forced engagement. This is a minimal and unsatisfactory approach to consultation which has left even the informational base for public debate frustrated, and many important strategic and local issues utterly unresolved.

We therefore believe that a full and final Stage 4 consultation is needed, after Government policies currently under review have been fully established, and that the public interest would be served if the environment report, the consultation report and the business case for the project were to be made available to the public in advance of the DCO. This would assist interested parties and consultees in general in preparing fully informed views to be presented to the planning inspectors.

We suggest, additionally, that EDFE retains a full archive of responses to its consultation exercises and make it publically available to legitimate parties. This would assist planning inspectors probing contested issues and any subsequent procedural challenges within the planning approval and licensing process.

Conclusion: SZC is a comprehensively unsatisfactory project

Stage 3 can be understood to show that:

- a: Sizewell and Suffolk East coast is the wrong site for such a massive project
- b: the EPR reactors are the wrong technology and design for a range of reasons - cost, carbon footprint, longevity, inflexibility
- c: the proposed build date and operating lifetimes are inappropriate
- d: its net economic and other legacy values are noticeably low, while it can be inferred that these values also substantially underestimate its socio-economic costs.
- e: the consultation process has been unsatisfactory, limited and obfuscatory, short of the public governance standard of "due diligence" and insufficient

for the formation of reliable community opinion on, in particular, the strategic issues involved. We see the case for a full Stage 4 consultation as a matter of public duty, and await full EIA/HRA assessments as a consultation issue. This work cannot be left to a final Environment Report with the DCO. We are quite confident that this would show that on nature capital and dependent issues, that Suffolk East with some 50 plus designated nature sites and their variously protected species can be neither mitigated against damage nor compensated.

ends

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