

Late Soil Mixing and Ground Anchor Trials at Sizewell C

East Suffolk Planning Applications DC/21/5408/EIA and DC/22/0078/FUL

On behalf of the following Interested Parties:

Theberton & Eastbridge Parish Council

Stop Sizewell C and

Minsmere Levels Stakeholders Group

In our previous submission to the Planning Inspectorate, after the close of the examination, which will accompany their report to the Secretary of State regarding the Sizewell C project, “**Summary of Concerns and Objections to the Sizewell C Development Consent Order Application**” we made some references to the two planning applications detailed above. This document will expand our concerns regarding these applications.

The results of these trials and a fully elaborated solution to the issues of ground suitability and stability should have been determined during the Sizewell C consultation period and included in the DCO Application.

We are concerned that whilst the ground anchor trials are distributed around the interior of the proposed platform, the soil mixing trial is located only at an area close to the Sizewell Marsh SSSI and within the proposed cut-off wall boundary.

One of the most critical areas for ground improvement is below the Hard Coastal Defence Feature, to the east of Bent Hills. However, there is no plan to engage in a test of this area despite the ground makeup being very different to that at the currently proposed test site, as evidenced in [APP-289](#) of the Sizewell C DCO Application.

So, it will remain unknown whether the soil mixing trials will lead to a satisfactory solution for ground strengthening of the Hard Coastal Defence Feature which might avoid slumping and/or lateral collapse, over the operational and decommissioning lifetime of the power station.

The proposed trial to examine the area is scheduled to start in April 2022. According to the Applicant, results will not be available for 6 months following commencement of works.

So, results will not be available for the Secretary of State to consider within the time limits set for determination of the DCO Application on 25th May 2022. Indeed, the trials will be less than a third of the way through.

As this trial is being conducted outside of the DCO examination period, there will also be no opportunity for scrutiny by Interested Parties, several of whom have expertise in ground improvement design and engineering, including for coastal protection schemes. They, and others, expressed serious concerns regarding the lack of design detail, including ground improvement, for the Hard Coastal Defence during the consultation and examination stages of the Sizewell C DCO Application and responses from the Applicant were still outstanding at the time the examination closed.

We are concerned at the potential for significant damage to the coastline across Sizewell Bay should any Hard Coastal Defence Feature collapse, after failure of ground improvement, and the consequential impacts that might occur to the existing Sizewell B operation, which has its cooling waters intake and outfall very close to shore when compared to those proposed for Sizewell C.

As a minimum we believe that an Environmental Impact Assessment under Schedule 3 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (TCPR) should be carried out, and an Environmental Statement submitted before this matter is considered any further. Additional Soil Mixing Trials should be planned directly below the proposed Hard Coastal Defence Feature and **the results should be made available for scrutiny before any formal decision is made regarding the DCO Application.**

We have objected to the [DC/22/0078/FUL](#) application submitted by Ms. Carly Vince of Sizewell C, the Applicant, and are concerned as to the legitimacy and depth of scrutiny in the determination of [DC/21/5408/EIA](#) Scoping Opinion for this application. Details are given below.

East Suffolk Council, being in receipt of both the scoping opinion request and latterly the full application, is placed in an invidious position of having to determine the application outside of the encompassing National Strategic Infrastructure Planning environment applicable at Sizewell C.

This is an abuse of process by the Applicant and yet one further example of under-provision of information during the consultation and examination stages of the Sizewell C project.

Scoping Report Request [DC/21/5408/EIA](#)

In the case of the determination of [DC/21/5408/EIA](#) and the need for an Environmental Impact Assessment, the Applicant has proposed that because Planning Practice Guidance states that “*exploratory deep drilling on its own is unlikely to require Environmental Impact Assessment*” plus examination of Schedule 3 of TCPR, the need for an Environmental Impact Assessment is not met.

East Suffolk Council has concluded the same.

However, having accepted that the project should be assessed as a TCPR Schedule 2 drilling development and that the 1ha area is exceeded, then looking at Schedule 3, there are significant areas where there are likely impacts and, in our opinion, should have required an Environmental Impact Assessment.

The Applicant has not evidenced in its scoping opinion request that potential impacts are unlikely or of an insignificant nature.

There is an over-reliance by both the Applicant and East Suffolk Council on deferring all potential impacts to the Outline Construction Environment Management Plan (oCEMP), without sufficient evidence presented to support such an approach.

In the Decision, for [DC/21/5408/EIA](#), East Suffolk Council states clearly that “*During the works, there is potential for indirect adverse effects to surface water and groundwater receptors from changes to local drainage patterns, site runoff (including sediment from ground disturbance) and spillages of materials and chemicals*”, yet the East Suffolk Council assessment then ignores this potential, deferring all considerations to the oCEMP.

In reviewing the decision with respect to **Schedule 3, 2.- (1) The environmental sensitivity of geographical areas likely to be affected by development must be considered...** sub-item (c)(i) “**wetlands, riparian areas, river mouths**” is assessed by East Suffolk Council as “**Not applicable**”.

However, Sizewell Marsh SSSI is within 10 metres of the soil mixing test site and Sizewell Drain a similar distance. Whilst the test area itself may not be wetland, Sizewell Marsh SSSI is a wetland with significant wet woodland, fen meadow and reed bed and two significant drains close to this test site, and is supported by the definition of riparian “*relating to wetlands adjacent to rivers and streams*”. All these areas within the Sizewell Marsh SSSI are “**likely to be affected**” by this

development and, given their proximity, should be the subject of a thorough Environmental Impact Assessment and Environmental Statement.

In deciding that sub-item (c)(i) is **“Not applicable”**, and no Environmental Impact Assessment is required, East Suffolk Council has lost sight of the fact that the soil mixing trials accompanying the ground anchor (drilling) trials - within the environmentally sensitive area of the AONB and within 10 metres of the Sizewell Marsh SSSI and Sizewell Drain, with their functional connection to the Minsmere and Walberswick Heaths and Marshes SSSI with its overlapping SPA, SAC and Ramsar designations - are at risk of significant effects through both surface and groundwater impacts.

In support of the above statement, it is relevant to note that in the Sizewell C DCO application ([REP7-036](#)), the Applicant states that *“an environmental sheet pile barrier will be needed to protect the SSSI prior to ground improvement works progressing”* close to this location. Whilst Sizewell C does propose a surface drainage channel to protect against surface run-off, there is no deeper protection proposed for this work and Sizewell C offers no evidence that, contrary to its DCO statements, such deep protection is not necessary.

In considering item **(c)(v) European sites and other areas classified or protected under national legislation** East Suffolk Council states *“The site lies within an AONB and adjacent to a SSSI.”*, which ignores the fact that it is also within a hundred metres of a second SSSI site with SPA, SAC and Ramsar designations as referred to above.

Also, the fact that the Environment Agency, Natural England, Suffolk Coast & Heaths AONB and Water Management Alliance/Inland Drainage Board were not consulted for the scoping opinion is a gross omission for this scoping opinion request.

The only respondents to the application were Suffolk County Council Archeological Services and the Suffolk Fire and Rescue Service and this application had been decided before many local organisations, Parish Councils and interested parties to the Sizewell C DCO Application were even aware of it.

Soil Mixing and Ground Anchor Testing Application [DC/22/0078/FUL](#)

We are concerned that, as this work will be carried out in parallel with the SZB Relocation development ([DC/19/1637/FUL](#)), insufficient assessment of cumulative impacts, from these two projects, on the adjacent protected areas has been made or considered.

We also question why the soil mixing trials are not also examining the area east of Bent Hills where the Sizewell C Hard Coastal Defence Feature is planned to be constructed. As evidenced in [APP-289](#) of the Sizewell C DCO Application, the proposed trial area has very different characteristics to the area where the Hard Coastal Defence is to be built. So even after the trial is complete and results known, we will be none-the-wiser as to whether the ground below the Hard Coastal Defence Feature can be appropriately strengthened.

The proposed timing of these works overlaps with the Sizewell B Relocation project, the breeding times for the bird population and the emergence from hibernation of the reptile population. The fact that this development is also significantly distant, from the Sizewell B Relocation, and extends the overall impact on Sizewell Marsh SSSI by disturbing foraging by avian protected species as well as the bat population. This increase in cumulative impact on protected species in the area is not properly assessed by the Applicant, a point that has been similarly raised by both RSPB and Suffolk Wildlife Trust.

As [DC/22/0078/FUL](#) application stands, it should be refused, and the [DC/21/5408/EIA](#) scoping opinion reconsidered whilst also engaging those environmental consultees referred to earlier before the application is considered further.