

IPG

28 SEP 2010

REF: \_\_\_\_\_

17 Nursery Close  
Comwich  
Bridgwater  
Somerset  
TA5 2JB

24 September 2010

Mr Paul Hudson  
The Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Dear Mr Hudson

We would hereby like to formally complain about the proposals that EDF are putting forward, on 5 counts:

- The plans for a storage and fabrication site at Comwich
- The refurbishment of the wharf at Comwich for use by EDF to bring in AIL's and other freight
- The plans for transporting some 5000 employees, 120 HGV's, an unspecified number of park-and-ride buses and up to 120 daily visitors to Hinkley C along the C182
- The plans for the developments at Williton and Junction 24 of the M5
- We would also like to formally complain about the way EDF have "consulted" - we believe it has been inadequate, secretive and underhand

Our letter to EDF (attached) is self explanatory but we would like to point out the effect that their plans will have on the lovely village of Comwich in particular.

1. **Buildings** The construction of 5 buildings on the edge of Comwich on 80 acres of land, just as you come into the village, of the following sizes will be noisy, will be a blot on this beautiful landscape, will be a pollutant to the countryside, a disturber of both peace and wildlife and an unmanageable nightmare for our country roads:

- 30m x 10m x 3m high
- 80m x 15m x 3m high
- 60m x 30m x 12m high, containing 2x 10-tonne cranes
- 80m x 40m x unspecified height fabrication shed
- 40m x 40m x 12 metre high fabrication shed
- Plus 4 large areas totalling almost 14 acres of outdoor storage and parking

2. **Utilities** During the building period of these structures, EDF claim "*it is likely that new power, drainage, potable water and possibly gas infrastructure services will need to be extended from existing networks to serve the site*". We can therefore look forward to frequent traffic jams and upheaval on Rodway whilst the road is being ripped to shreds by the utility companies. We can find no risk assessment for this work.

3. **Operations** Once built, these buildings will be in use almost 24 hours a day, 7 days a week, for a minimum of 8 years - drilling, grinding and banging whilst they build rebar cages, formwork, pipe spooling and other fabrication required for the building of a nuclear power station. We believe that, once constructed, these building will never be returned to green fields. The very fact that they are going to apply for such an operation on a green field site is beyond belief, as an individual wishing to build a home on that land would undoubtedly be turned down at the first hurdle.

4. **Traffic and Vehicles** In addition to the noise and light pollution that will be generated by these buildings there will be a **significant** increase in traffic. EDF have not published how many people will be working at the Combwich site nor have they disclosed the number of vehicle movements that will take place per day. However they have confirmed that we can look forward to the following:

- 2.5 acres of land will be dedicated to bus parking, staff and visitor parking at the Combwich site
- Parking for 75 HGV's will be provided at the Junction 23 site
- Parking for 45 HGV's will be provided at the Junction 24 site (all these HGV's will come thundering along Rodway, a "C" road, on their way to the Hinkley C site

As the road has already been upgraded (in 1957!), the only modifications that EDF propose to make to the road are to the junction of the C182 (Rodway) at the access road to the wharf, to allow for the following vehicles to get onto the main road:

- 30 axle Transport Frame Trailer (**overall length 80.16 metres**);
- 585 tonne Stream Generator on 20 Axle (**64.253 metres**);
- 585 tonne Stream Generator on Axle 4 File SPMT (**32.28 metres**).

Furthermore during the construction of the actual power station at Hinkley C, **5000 workers** will be transported in cars and on park-and-ride buses from Williton, Junction 23 and Junction 24 - right past the entrance to the village. This is on top of the traffic we have already! EDF state "*there is no dedicated cycle infrastructure within 5km and the existing road network within the catchment area is not amenable for cycling*" and, once fully operational and there's only 1000 workers travelling to HPC, "*It is expected that the majority of personnel will arrive by car*"! How on earth will this small country road sustain all this traffic, on top of what we have already.

5. **Combwich Wharf** Despite it being designated a "Site of County Importance", EDF also intend to refurbish Combwich Wharf in order to allow a 90 x 30 metre barge to deliver 120 AIL's (abnormal indivisible loads) and offload them using 50-tonne mobile harbour cranes. In addition to AIL's, further deliveries of the following material will be made to Combwich, making a total 16-20 deliveries per month:

- palletised or containerised items;
- steel reinforcement;
- pipework;
- cladding;
- consumables and other similar items necessary for the construction of a nuclear power station.

Apart from these almost daily deliveries adding to the noise and traffic problems that we can expect from the storage and fabrication site and the building of the power station, it will also prevent the leisure boat users from using the wharf for the majority of the day as it will be dominated by the 2700 sq mtr barge which will require the use of the tide in and out of Combwich. Use of the wharf by EDF will be required, not just for the 8 year build period, but also for 60 years during HPC's

operation plus a further 25 years when they decommission C station. Then of course there'll be Hinkley D!

We would also like to know exactly what they are currently doing behind their recently constructed curtain of fencing on the wharf at Combwich and why they have seen fit to hide behind it. Have they actually started the refurbishment?

6. **Hinkley Point Site** EDF are building a 760 metre long sea wall at Hinkley. They already have around 266 acres of land at the Hinkley Point site including a number of empty, decommissioned buildings. Why do they want to ruin our countryside, our village, our wharf and our lives with their noise, construction, fabrication, traffic, upheaval and pollution when they already have **all** the facilities they need on site?

7. **Legacy** EDF state in their "Masterplan" regarding the Combwich site that they will remove all the buildings and the land will be returned to green fields once Hinkley is built in 8 years time. However, they then state, on the same page, in their "Summary of Future Work" that they will "consider how the design is affected by legacy value and the potential for the re-use of the buildings". This site is NOT going to go away.

8. **EDF's "Consultation" Process** In Stage 1 of the consultation process there was no mention of Combwich as a site for a road freight depot, fabrication buildings and overnight bus parking or the 24 hour use of some facilities. There was no opportunity to comment on those issues at that time. Most of EDF's key preferred proposals for Combwich under the Stage 2 consultation:

- were NOT on display at the exhibition in the village
- were NOT mentioned in EDF's newsletters
- were NOT included in the EDF's literature delivered to the homes of near-by residents
- and have been hidden away in 9000 pages of documentation

EDF's so called "Consultation" has been inadequate and underhand and, if it hadn't been for the Parish Council trawling through EDF's 9000 pages of pre-application documents, we would probably still be none the wiser.

If EDF are allowed to go ahead with their plans this is what will happen to Combwich:

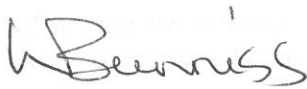
- House prices in Combwich will fall - who will want to live on a large scale industrial estate and with all that traffic?
- Noise levels will rise significantly – both from the 24/7 operation and the traffic
- Traffic will become unbearable - just getting in and out of the village will become impossible as 1000's of vehicles travel to Hinkley C
- Insurance policies will probably rise as the postcode will no longer be perceived as a "safe" area
- Light pollution will be noticeable
- Wildlife will be disturbed, probably never to return again
- The right for pleasure boats to use the wharf will disappear
- Peaceful, tranquil walks by the river will be gone forever as it seems EDF will fence off the route by the river and stop people walking there
- With an influx of 5000 people in the area, crime will undoubtedly rise
- Schools, hospitals and emergency services will be pushed to breaking point
- An accident at the power station would be impossible to deal with under the current plans and there seems to be no contingency for an emergency situation

I dread to think what will happen to Bridgwater town centre. Hinkley C is 7 times the size of Hinkley A built over 40 years ago and yet there seems to be no alternative plan from EDF to what will become a traffic nightmare, not only along Rodway but throughout the whole of Bridgwater and the surrounding areas. I would like to see a road and bridge built directly from the M5 to cope with ALL EDF's deliveries, fabrication and people. It is after all a 100+ year project, why is it being treated like a temporary one?

Please acknowledge receipt of this letter and enclosure.

Thank you in advance.

Kind regards

A handwritten signature in black ink that reads "L Bunniss". The signature is written in a cursive style with a large initial 'L' and 'B'.

Lynn Bunniss and Nick Carter

17 Nursery Close  
Combwich  
Bridgwater  
Somerset  
TA5 2JB

21 September 2010

Mr David Eccles  
EDF Liaison  
14 King Square  
Bridgwater  
TA6 3DG

Dear Mr Eccles

### **EDF's Proposals for a Fabrication and Storage Facility at Combwich**

Like the majority of its residents, we have chosen to live in a village for the peace, tranquillity and beauty of its surrounding countryside. The idea of having an 80-acre industrial estate in that village fills us with outrage and dread, in particular one that will house, not only storage, but the banging, drilling and grinding of a 24-hour fabrication unit which will construct the vast majority of parts required for the building of a nuclear power station.

Furthermore the additional 24-hour stream of traffic that will be generated by 120 HGV's taking loads from Combwich Wharf and the additional 5000 people on buses and in cars flying past the entrance to the village to Hinkley C, will be utterly unbearable and totally unmanageable. How on earth this small country road will sustain these vehicles, on top of holiday traffic and the employees that currently work on Hinkley B is unfathomable. Having read some of the Masterplan documents the traffic aspect has clearly been given very little thought by EDF and we might as well all go and live on the slip road of the M5.

House prices will undoubtedly fall, crime will probably rise, noise, traffic and light pollution will be horrendous, wildlife will be disturbed, the risk of flooding will increase resulting in higher house insurance premiums, trying to get in and out of Combwich will become a complete nightmare and the right for pleasure boats to use the wharf and the right for walkers to use the river path to the south of the ponds will disappear as EDF bullies move in and take over our beautiful village and our lives.

It is simply not acceptable and I find it incredulous that EDF can even consider it when there are acres of land and decommissioned buildings already on the site at Hinkley Point. Your argument about shipping in ALL's and freight via Combwich Wharf because it's not possible to bring them into Hinkley directly is quite pathetic. You are building a 760 metre sea wall and a nuclear power station, for heaven's sake. An on-site wharf would surely be a walk in the park for your engineering masterminds!

The way EDF have allegedly "consulted" is not only poor, but scandalous and I would like to lodge a formal complaint about your consultation process. Despite your 9000 pages of documentation you seem to have conveniently skimmed over many important factors in your Newsletters and have hidden other important information in the depths of the Masterplan documents, some of which even contradicts itself in places.

The fact that your engineers, to quote at a recent meeting, "hadn't thought about fabrication and where it should be located until very late in the consultation period" is laughable - in a somewhat frightening way. You are building a nuclear power station - WHAT ELSE HAVE YOU FORGOTTEN?!!!!!!

I would like to ask EDF the following questions and trust I will receive a reply to each of them before the 4<sup>th</sup> October 2010.

1. With regard to the following:

- a. parking for 75 HGV's at Junction 23
- b. parking for 45 HGV's at Junction 24
- c. 2.5 acres of land dedicated to parking at the Combwich site
- d. together with the transportation of 5000 workers when work starts on Hinkley C

Where can I find your risk assessment relating to the traffic management of all these additional vehicles and workers who will be using the C182 and passing the entrance to the village of Combwich?

2. You claim in your Masterplan that *"The access road into the existing Hinkley Point Power Station Complex, the C182, would also be the main access for the proposed development"*. You also state that *"The main access road serving Hinkley is the C182..... The road is single carriageway which was upgraded as part of the construction of HPA"*.

You fail to mention that upgrade was in 1957!! Things were somewhat different 43 years ago. How can this C road, (not A or even B road), *possibly* sustain all this extra traffic? How exactly do you see that working?

3. There has, as far as I can find, been no consideration for a road being built from the M5 directly to Hinkley Point, which would avoid pushing all the additional traffic through the already heaving Bridgwater town centre, through the village of Cannington and past the entrance to the beautiful peaceful village of Combwich. Given that this is a long-term investment, probably a 100-year project overall, why has this not been considered?

4. In regard to all the additional 5000 people and traffic, where can I find your risk assessment in relation to the safe evacuation of both employees and neighbours in the event of an accident at the power station? What provision have you made for emergency services getting through and what will be the impact on local hospitals, police and fire services in an emergency?

5. In your Masterplan you make the following statements with regard to the time when Hinkley Point C is built and operational:

*"It is expected that the majority of personnel will arrive by car"*

*"The workforce would access the site by private car and bicycle"*

*"The access road into the existing Hinkley Point Power Station Complex, the C182, would also be the main access for the proposed development"*.

*"Park and ride strategies during the construction period will not be continued during the operational period of HPC"*

*"There is an existing bus network. Generally speaking the shift times of the HPC operational workforce will not correlate with the bus service times."*

*"There is no dedicated cycle infrastructure within 5km and the existing road network within the catchment area is not amenable for cycling"*

*“Approx 1000 additional staff would be employed on each UK EPR reactor unit during planned refuelling and maintenance outages. Therefore, there would be approx 500 additional staff on site at any one time”*

You state that *“Additional facilities would be required and provided to support this temporary increase of the workforce on site including parking, office and welfare facilities”*. However there is no mention of how you will ship all these extra people in. By car presumably, given that the park and ride buses will no longer be in use and people will be unable to cycle there?

With up to 1000 cars, plus visitors and additional staff, plus 120 HGV's and an unknown number of park and ride buses travelling along the single-carriage C182, past the entrance to Combwich, with some travelling through country lanes from Williton and others through Bridgwater from Junctions 23 and 24, how then, do you quantify your attempt, as quoted in your Masterplan, to *“reduce the car traffic generated by the operation of the HPC site”* and *“encourage alternative transport modes”* What alternatives will there be other than by car?!

Exactly how will you reduce the traffic along this road? How can this single track country “C” road possibly sustain all this extra traffic?

Where is your risk assessment of the additional traffic and the estimated impact on the local community and the affect it will have on Bridgwater, especially considering the proposed construction of a new Morrisons, (purported to be the largest in Europe), the National Grid pylon upgrade, the Steart project and numerous school rebuilds?

6. Where exactly will the AIL's and freight deliveries be coming from which require them to be shipped by water and offloaded all the way up river at Combwich when they could be transported directly to Hinkley? I understand you are building a 760 metre sea wall at Hinkley. Why has no consideration been given to the re-enforcement of this wall to take your deliveries straight to site?
7. In your Legacy section of the Masterplan, you claim that *“Following cessation of use by EDF, it is envisaged that the structures within the freight logistics/storage facility at Combwich will be completely removed including: the land will be reinstated to green fields”*. And yet, on the same page you also state that you will *“consider how the design is affected by legacy value and the potential for the re-use of the buildings”*. Which is it to be?

Your Masterplan claims *“The planned operational life of the power station is 60 years. In addition to outages for routine refuelling and maintenance, major maintenance and replacement would be performed. The most significant elements potentially requiring replacement would be large components such as parts of the generator. These would be delivered by road and/or sea ....”*

So are we actually going to have these AILs coming in and out of Combwich for the next 60 years?!

*“At the end of the operational life, the power station would be decommissioned and the buildings, other than the Spent Fuel Interim Storage Facility, would be removed and site de-licensed over a period of approx 25 years”*.

So on top of the 60 years of shipping the big gear in via Combwich, presumably there'll be a further 25 years of shipping the big gear out via Combwich?! Can you please confirm this?

8. What will be the opening hours of the 120-place visitor centre and how will visitors access the plant?
9. Regarding Hinkley Point C, you claim that you will utilise the electricity generated from the plant *“making the operation low carbon”*. However, given that there are 50 substantial buildings being

constructed on the HPC site together with various pits and ponds, predominantly made of concrete, can you please advise what carbon emissions will be produced in the actual building of the power station? A calculation has, presumably been done, given the government's commitment to cutting carbon emissions? How does this compare to the use of the electricity you will generate?

10. *"Assessment of noise emissions arising from the operation of HPC has been undertaken. This assessment indicates that noise impacts will predominantly arise during the construction period of the project".* Well, there's no surprise there, kind of states the obvious, but where are the results of your assessment of the noise and light pollution impact of not only construction of HPC but also the construction and operation of the Combwich site?
11. According to your Masterplan *"Low level waste and very low level waste would be segregated and sorted to reduce the volume requiring disposal. It will be sent off-site on a regular basis to appropriate treatment and disposal facilities. Typically this will involve a few lorry journeys per year".* Where are these sites? Combwich? Where is your risk assessment for the movement of this waste?
12. Also in your Masterplan *"Small quantities of non-radioactive wastes would be produced. Some of this will be classified as hazardous waste and require special storage and treatment arrangements. This will include batteries, solvents, paint residues and decontamination products".* Where is this waste is to be stored and again, where is your risk assessment for the storage of such materials?

Please don't tell me to read or refer to anymore of your Masterplan or consultation documents. I don't have time to trawl through them all looking for the answers to my questions. I look forward to your response.

Yours faithfully

Ms L Bunniss and Mr N Carter

Copies sent to:

Sedgemoor District Council

Somerset County Council

Sedgemoor Area Highways Office

West Somerset Council

IPC

Environmental Agency

ARUP

Ian Liddle-Grainger, MP

Chris Huhne, Secretary of State for Energy and Climate Change

Philip Hammond, MP and Secretary of State for Transport

Bridgwater Mercury

Ken Dyer, Councillor

David Joslin, Councillor

John Edney, Councillor