Leiston-cum-Sizewell Town Council Written Representation Issue Specific Hearing 1 - Draft DCO and s106 Agreement

The following is partly what I had prepared to say but modified to make more relevant to the specific issues being discussed and some further points that arose from listening to the discussion during the hearing.

In March 2020 councillors from Leiston-cum-Sizewell Town Council went on a fact finding visit to Bridgewater to see Hinkley Point C and to talk to Sedgemoor and Somerset West and Taunton District councils. We heard from district councillors, council officers, a parish councillor from Sogursey and from EDF. We also toured the site.

One of the most important points that we took away from the visit was the importance of making sure there were robust standards for levels of noise, dust, air quality, traffic and strong independent monitoring for these and other impacts on local residents and the community and reliable methods of enforcement. Since then, we have repeatedly asked for this.

Clearly we do not have the knowledge and expertise to set these standards, but we rely on you, the examiners, and the local authorities and regulatory bodies to ensure that they are robust and also to establish clear and independent methods for monitoring and enforcing them during construction. We were told about the Oxford Brookes research, Study on the Impact of the Early Stage Construction of Hinkley Point C Nuclear Power Station. This is in the examination library as an appendix to the LIR from Suffolk County Council and East Suffolk - Deadline 1 (D1) > Local Impact Reports (LIR) Appendix 2.1.

In Section 6.1 of the report it makes recommendations for all parties including the Planning Inspectorate, but it also points out where monitoring is working well and where there were omissions at Hinkley Point C in setting standards and collecting and monitoring data to make sure set standards are adhered to. We would, therefore, expect that the areas for improvement identified in the conclusions of that study would be implemented with this development - for example, standards and methods for monitoring impacts on biodiversity also monitoring of freight emissions, workers mode of travel, bus movements and emissions, travel delays experienced by local people, impacts on school numbers, impacts on users of PRoW should all be established at this stage.

Whilst we and other parish and town councils may not be able to set standards and identify monitoring procedures, we will be able to provide knowledge of the impacts on residents during construction and after. Some of the monitoring data will take the form of complaints. We will be amongst the first to hear these, even if only anecdotally, and may ourselves experience adverse impacts. We, therefore, think it essential that there is representation from town and parish councils on the working groups and Review groups that are proposed in the governance structure 5.2 in Deed of Obligation.

These currently do not appear to include any representation at parish or town council level. In 6.2.5 Figure 1 of the draft deed of obligation there are two orange boxes Main Site Forum (inc. transport) and Associated development Fora. I cannot find any other reference to these forums or what their function, structure and role would be. I would be grateful for further information on this point.

I have been told by EDF that there are plans for community forums but these are still under discussion and therefore do not appear in the application at this stage. We need details to be discussed, finalised and made enforceable.

If the planned forums will be the equivalent of the Community Forum or the Sizewell Stakeholder group (which would be welcome) then we think representatives from those forums should have a place on the review groups so that local voices are heard there. That would be a way of ensuring some representation at parish level without making it too onerous for the resources of parish and town councils or too cumbersome for the developer.

We think that it is essential that when issues arise during construction there will be a clear route for issues to be reported, identified and where possible remedied and acted upon. If this process is too remote from the people most closely affected, it will result in increased tension and friction. As it says in the Oxford Brookes study, "Some local issues affect community wellbeing. Such issues can escalate quickly, for example with fly parking. The speedy resolution is vital not only for the affected places, but also for community confidence in the management of the project."

The second point was not made at the hearing because it did not seem directly relevant to the discussion. However, I will make it here. In the LIR from local authorities and in the CIR from applicant many adverse impacts for Leiston are identified see para 36.12 of LIR but specified mitigation is largely confined to new traffic scheme - yet to be fully agreed and consulted on- and the sports pitch, which will be used by the school in the day time the construction workforce in the evenings leaving little time for residents of Leiston to enjoy it. Mention has been made of extra funding for Leiston through the Community Fund, particularly for the Waterloo Centre but details of this are yet to be decided. Already we are aware of a number of projects hoping for funding through this source.

There is an assumption that Leiston will benefit economically from the project and that this will offset some of the adverse impacts. This prediction may not be borne out in reality. We think that, given the scale of the expected impact on Leiston, these potential benefits are insufficient. Particular areas of concern remain housing and accommodation, community safety and cohesion, impact on local services and cumulatively effects on people's mental health and well-being.

During this hearing the applicant was repeatedly challenged on issues of language where the wording allows the developer great flexibility. We support the efforts of the district and county council to refine and define language and terms so that any conditions and mitigation are enforceable. I particularly noted the comments made by Alison Downes in the morning, which I would fully endorse. The applicant wants flexibility but local people need rigorous and enforceable standards.

Another issue was the applicant's reluctance to specify times or trigger points for mitigation works to be completed. This is an issue of great concern to Leiston Town Council. Councillors have frequently said that infrastructure works must be completed before work on the main development site starts. The applicant said that there was no necessity for specifying times as it would be in their own interest to complete work in a timely manner. They could not see what reason there could be for stipulating times. For example, if the caravan site was not completed in time then there would be no problem because outages with similar numbers of workers to those expected in the early stages of construction are regularly accommodated locally. I would then ask about what would happen if construction workers' arrival coincides with an outage, or if an outage continues beyond its expected time (as is the case with the current outage)? The reasons for mitigation being delivered in a timely fashion are the intolerable impacts on local people, flora and fauna, if it is not.

If the project is given approval, then we ask that these issues are addressed in greater detail in the s106 agreement to safeguard the interests of Leiston residents and other local people.