

The Sizewell C Project, Ref. EN010012

Additional information requested by the ExA for this deadline: Alternative Outage Car Park

Suffolk County Council Registration ID Number: 20026012

Deadline 5

23 July 2021

Purpose of this submission

1. In its Written Representation [REP3-042], SCC set out its view that there was not a need for the permanent provision of two car parks for outage workers (para 4.26 et seq), one each for Sizewell B and C, both of which would be in the AONB, and that the outage car park at Goose Hill was not justified as additional development within the AONB. In that submission, SCC accepts (para 4.38) that there may be rare occasions, when there was an overlapping of outages and the capacity of one outage car park was inadequate. SCC considers that feasible solutions should be found for excess car parking in these rare occasions to take place off-site.
2. At ISH5, SCC was asked by the ExA to provide greater detail on how it considered that this could be achieved. This note sets out a further assessment of the subject. The note should be read in conjunction with SCC's Written Post-Hearing Submission for ISH5 submitted at Deadline 5, and SCC's Written Representation [REP3-042].

Risks of need for additional outage car park

3. The Applicant stated at ISH5 that while, in general, planned outages for the three different power units at Sizewell (of Sizewell B and C) will be arranged so that there won't overlap, the risk of two of those reactors being in outage at the same time due to forced unplanned outages, or planned outages overrunning, was too great. The risk of three reactors being in outage at the same time was according to the Applicant far less. The Applicant did not provide at ISH5 an indication of the level of likelihood of two (or three) outages happening in parallel.

4. The Applicant notes in their comments to SCC's Written Representation ([REP3-044, para 6.3.22): "Once a [outage] clash occurs, which would typically be due to a forced/unplanned outage, clashes would continue to occur until there is another forced/unplanned outage." In para 4.36 of its Written Representation, SCC contends that, that, even if an overlap does take place, it would be unlikely that overlaps would continue to occur in the longer term: due to the pressures of availability of specialist workforce, transport, accommodation and costs, it is likely that any further double outages, which thus would become planned double outages, would be avoided by the operator.
5. On any unplanned overlap event, it is noted that, while a typical planned outage may use up to 1000 staff, this is a maximum, and these numbers are not used for the whole of the outage. Supplementing this, there is less of a risk that the peak of both outages will necessarily coincide, even if there is some simultaneous work on more than one plant. Furthermore, SCC understands from its advisors on electrical engineering, AFRY, that an unplanned outage would generally result from a specific issue with a power station and therefore only the relevant specialists would be involved with the required repairs.
6. We note that the Applicant was asked to confirm whether the implications of the possibility of a double outage occurring on accommodation needs and traffic impacts have been considered within the Environmental Statement assessments and will look forward to the Applicant's confirmation on this matter.

Alternative options to dealing with any need for additional parking

7. Notwithstanding SCC's view, that it is unlikely that the overlapping of outages will be such that the capacity of one outage car park is exceeded, it has considered how this eventuality might be handled. This would be notwithstanding the notion that it is not clear why the permanent staff car parking could not be partly reprioritised for outage workers during an outage.
8. Based on SCC's view of the relative infrequency of the need for additional parking to cater for more than one outage at a time, perhaps with a gap of many years, it would not seem proportionate to set aside a fixed facility for overflow car parking, whether inside or outside of the AONB. Therefore, SCC would recommend a more flexible and adaptive approach.
9. The first step would be to follow the principles of demand management, as set out in Figure 15-1 Sizewell C Transport Strategy Hierarchy [REP3-044]. During a period of simultaneous outages, this would require, for instance, the maximising of car sharing, and the use of direct bus services from major residential locations and local transport hubs such as Ipswich, Saxmundham and Lowestoft Rail Stations. This should be enforced for operational staff, as

well as outage workers, in order to make the best use of existing transport and parking assets.

10. If further parking was required for simultaneous outages, then this should be off-site, with links provided by a park and ride approach. This has been seen as an acceptable approach for the workforce during the construction phase, and there is no apparent reason why this should not also be appropriate during outages (either for the outage workforce, the permanent workforce, or a mix of both). The Applicant has mentioned that some outage staff bring their own tools with them, therefore needing to park close to the site. SCC considers that these should be given priority in the existing outage car park and thus making best use of existing on-site assets.
11. Such measures as set out above can be documented in an Operational Travel Plan. Suffolk's guidance for travel plans recommends that they should be reviewed after 5 years and, if compliant, need not be continued. The unique nature of this project would suggest prolonging the application of an Operational Travel Plan, at least on a voluntary basis, for the lifetime of the station. Good practice and experience can then be embedded within the management of the project and demand managed to minimise the requirement for temporary parking. This approach would also add flexibility in the long term to respond to changes in the transport mode used by the work force.
12. Given that only occasional use of an additional outage car park facility over a number of decades is required, SCC does not consider that it is necessary or appropriate to identify and provide sites that will sit empty for years.
13. SCC's suggested approach is that the Applicant sets up a "call-off" contract, with one or more local farmers or landowners. Each participant would need to receive an annual fee (retainer), to incentivise them to take part, whilst the costs paid for implementation of temporary parking would be purely on the basis of income forgone, for use of the land. In this way the costs of running the scheme are known and managed annually, and implementation costs are capped to only income lost (and restoration costs). Furthermore, there can be no "hostage taking" by landowners on price at the moment when land is required. Such contracts would run for a reasonable period of time, perhaps of the order of 10 years, with the possibility of renewal if both sides agreed. The land would continue in its existing use, unless and until called upon as temporary parking.
14. Such call-off contracts could be seen as analogous to the approach used by SCC in making provision with farmers for winter snow-ploughing.
15. Given the long period of time over which such arrangements may be needed, i.e. for the duration of the power station life, it is not possible to say that any one particular site is likely to be suitable. Sites would of course be subject to

negotiation, with the property owners and/or tenants. These sites would not need to be immediately adjacent to the power stations, indeed, there may be some merit in these being at a slight distance, to avoid in part the local congestion from outage workers accessing the site at the same time that is apparent with the current single outages. Ground conditions and access to a reasonable standard of highway would, of course, need to be taken into account.

16. Some preparation may be required for the use of a particular site. Discussions would need to take place with the local planning authority, to consider the suitability of such sites for temporary use. and if necessary, access to the site from the highway should be agreed with the highway authority. If an improved access is required, it may be expedient to put this in place in advance, and ensure appropriate permissions are resolved. However, if any running surface is required within the car park, then this would be installed as a temporary provision. There are commercial companies who provide such facilities (e.g. [Car Parking - Captrac](#)).
17. Reference was made by the Applicant at the hearings of the need to provide facilities at the power station end of any park and ride scheme, for bus shelters, welfare facilities etc. Given the only occasional use envisaged for such facilities, these could be provided as temporary structures. Alternatively, if sufficient buses are in use, then there could always be a bus at each terminal point, and passenger waiting would be on board, rather than providing shelters. As part of forward planning, it may be appropriate for consideration to be given as to whether any space is required for such structures, and bus standing areas.
18. While it is recognised that it may take a little time to set up a temporary car park, even with such preparation, it would also take time to assemble the additional workforce for two parallel outages in the case of forced outages.

Conclusion

19. In the view of SCC, the very occasional need for more than one car park for outage workers does not justify provision of two such areas within the AONB. NPS EN-1 para 5.9.10 sets out tests as to whether there are exceptional circumstances that would suggest that such development should be allowed there. This includes the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need in some other way.
20. The approach suggested above demonstrates how the need may be met outside the designated area, in some other way. Of course, there may be other alternative approaches to deal with parallel outages to the one proposed in this paper, which still would avoid the additional development of an outage car park within the AONB.