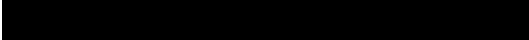


THEBERTON AND EASTBRIDGE PARISH COUNCIL

Mrs Sharon Smith
Parish Clerk
Arbour House
Rectory Road
Middleton
IP17 3NP

01728 648576



The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

14th February 2020

Dear Sir/Madam

Re: EDF New Nuclear Build's Sizewell C nuclear power station proposal

I am writing on behalf of Theberton and Eastbridge Parish Council (TEPC).

During the pre-application process for the above we have become increasingly concerned about the lack of environmental impact detail, as well as justifications for options chosen by EDF New Nuclear Build (EDF NNB). This has made it extremely difficult, or impossible in some cases, for TEPC to assess whether the conclusions EDF have reached regarding impacts, option rejections and decisions within the avoid/mitigate/compensate hierarchy are appropriate, as insufficient evidence has been supplied during four public consultations.

We have asked for more detailed information at each consultation and pointed out our concerns in our responses to the four consultations but, as each consultation has been released, we have found ourselves in a position whereby insufficient detail has been forthcoming. Now that pre-application public consultations are finished, we can only bring this to your attention and submit that we believe that the public consultation has been inadequate and has not met the guidance associated with the Planning Act 2008 nor the original or updated Statement of Community Consultation.

TEPC remain unable to make informed responses to the Sizewell C (SZC) proposals that give proper consideration to the environmental impacts and assessments associated with the development, as studies that were proposed over six years ago in Stage 1, and even earlier in EDF's Scoping Report, have still not been made available via the consultation process.

According to the advice from the Department of Communities and Local Government: 'Planning Act 2008: Guidance on the Pre-application Process':

The front-loaded emphasis of consultation in the major infrastructure planning regime is designed to ensure a more transparent and efficient examination process. (6.)

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This document also refers to section 50 (3) of the Planning Act 2008, which makes clear that applicants 'must have regard to any guidance under this section' (i.e. pre-application procedure).

Without such front-loading of evidence within the consultations, it has not been possible to assess whether appropriate avoidance/mitigation/compensation strategies have been identified and agreed at an early stage.

Baseline information material and surveys are referred to in the Preliminary Environmental Information documents, but these have not been made available during the consultations despite several requests and we are told that these will only be made available at publication and acceptance of the Development Consent Order (DCO). As a result, TEPC are of the opinion that the pre-application procedure has not been transparent.

In order to make an informed response to proposals presented during EDF's pre-application consultations, insufficient detail in its preliminary environmental information has been provided to comply with the guidance on conduct of a National Strategic Infrastructure Project (NSIP).

Suffolk County Council (SCC), East Suffolk Council (ESC), Environment Agency and others have all commented on the paucity of information made available by EDF NNB for respondents to make informed responses throughout the four-stage consultation period.

Paragraph 19 of the above pre-application guidance document, states:

A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues.

As a Parish Council, we have limited resources to scrutinise complex proposals such as this for one of the largest construction projects ever contemplated in the UK. As a result, it is vitally important that EDF provide clear and well organised information on their pre-application consultations so that organisations such as ours can come to an informed position.

At Stage 2 we stated:

2.2 *Given the sensitivity of the coastline both inland and seaward, we have been unimpressed at the paucity of detail regarding the possible, or probable, environmental impact provided at this second stage of consultation. Such information, as is provided, is dispersed almost randomly throughout the main document and is most difficult to access in the absence of any index and without any significant attempt at internal cross-reference.*

2.12 *It is essential that the cumulative impact of the SZC development on the Minsmere Levels and Sizewell Marshes SSSI is set out well in advance of the Stage 3 consultation, with the evidence underpinning these judgements properly documented.*

and,

2.19 *Regarding water requirements through both the development and operational phases, this is a significant omission in the Stage 2 consultation document. It was also clearly omitted from the Stage 1 consultation and needs to be addressed, considering this area is known as one of the driest areas in the UK.*

We have had two further stages of pre-application consultation since these comments were made and further information has still not been made available with EDF NNB saying that such information will only be made available within the DCO application and Environmental Statement.

At Stage 3 we stated:

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2.2 *We are concerned that the true nature of the area in and around Sizewell Marsh that is to be destroyed or damaged by the development, is poorly represented in the Preliminary Environmental Impact Report (PEIR) and ask that EDF publish in full the surveys referenced in its PEIR as well as any historic surveys within the SSSI, so consultees can understand both the current status and long term trends developing within the marsh and assess the potential threats introduced by the development.* 2.8 *We are pleased to see improved assessment conclusions in a number of areas including surface water impacts but are still concerned that these are not always supported in the PEIR by underpinning data or figures in volume 3 of the PEIR. In particular the request by the Secretary of State (SoS) in the Scoping Report Opinion stressed that a good understanding of the relationship between surface water and groundwater be established to ensure that threats to both Sizewell Marsh and the south Minsmere Levels could be properly modelled and appropriate mitigation be planned for potential impacts. This is completely absent in the PEIR.*

12.1 *Once again, the level of detail, lack of adequate justification of options and rejection of options with minimal or no justification is lamentable.*

and,

13.4 *We are of the opinion that EDF have not at this time satisfied their Statement of Community Consultation or conducted a consultation that meets the requirements of the National Planning Policy Framework and that a further stage of consultation should be entered into once sufficient clarity and supporting information has been determined and collected in order to provide a meaningful Preliminary Environmental Impact Report that will provide the necessary justification for the choices and proposals made to support this development.*

It was stated that Stage 3 was to be the final stage of consultation but at very short notice over the summer holiday period in 2019 EDF NNB did enter into a further pre-application consultation.

At Stage 4 we stated:

1.2 *TEPC is, once again, disappointed that at this Stage 4 consultation, studies that were proposed over 6 years ago in Stage 1, and even earlier in EDF's Scoping Report, are still not started. We note that the Environment Agency in their Stage 3 Consultation response criticized EDF's lack of progress in this regard. Once again, little additional information has been provided on impacts to the environments that this construction site will occupy and the adjacent designated sites at Sizewell and Minsmere.*

1.12 *EDF has told us on many occasions that some information has always been withheld (such as the report on the Sizewell Link Road and alternatives) because they did not wish to overload the local community with information. However, as all this additional data has to be released at the point the Development Consent Order is submitted, the local community will be faced with a gargantuan task to sift through all of the documents and will be overloaded, precisely the opposite of what EDF supposedly would wish to happen. As a result we believe EDF have still not satisfied their Statement of Community Consultation or followed the National Policy Planning Framework in spirit and have evaded communities expectations to have a constructive dialogue based on proper consideration of evaluations and reports into the various aspects and impacts that this development will entail.*

and,

13.3 *We support ESC and SCC in their response which states "the combined evidence of Stage 3 and 4 still remains insufficient for the Councils to fully evaluate the adequacy of the proposed*

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mitigation proposals and to reach a final conclusion with regard to the development as a whole.”

This consultation introduced some adjustments to the proposed Sizewell Link Road and Theberton Bypass proposal and visited a smaller subset of locations with Consultation Exhibitions. However, no exhibition visited the two villages. Middleton and Theberton, most affected by this proposal and the exhibitions that did occur were confined mostly to daytime hours when a significant part of the population would be at work. EDF NNB's lack of transparency and willingness to provide adequate detail to us during Stages 1 through Stage 4 as consultees, has prevented us from making an informed response to the consultations. As a result, we believe that this DCO application has not reached an appropriate stage for examination by the planning inspectorate.

The official guidance states under paragraph 15:

Effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State.

Maximum On-site Workers

We have now been made aware that EDF NNB have requested for the maximum worker numbers at Hinkley Point C site to be increased from the approved DCO numbers of 5,600 and have had initial discussions with both the County and District Councils to this effect, although the numbers involved and final outcome are yet to be determined.

In the Stage 3 consultation, EDF NNB introduced a new level of workforce analysis with a maximum on-site workforce of 7,900 compared to the previously quoted 5,600 maximum. This was presented as being used for sensitivity testing of the traffic modelling and a way of ensuring a “worst case” scenario which also accounted for the Sizewell B outages where up to 1000 extra workers are on-site for several months per outage. At no point has the additional 2,300 figure been presented as a likely or serious potential scenario for SZC on-site workers.

Both Scoping Report submissions to PINS (2014 and 2019) referred to paragraph 6.2.17 of the 2014 submission which stated:

Therefore, the assessment will primarily focus on the impacts at peak construction (the phase of the workforce profile when approximately 5,600 construction workers will be employed at the proposed development, for a period of approximately two years).

Volume 1 of Stage 3 documentation states:

- 4.2.4. *This included a peak workforce estimate of around 5,600 workers on the main development site (of which approximately 2,000 were predicted to be home-based)....*
- 4.2.6. *The ‘central case’ workforce profile assessed for the purpose of Stage 3 is unchanged from Stage 2*

Reference is also made to the 5,600 worker estimates as having been contained in Stage 2 consultation documents and to be reliable as they have also been based on initial experiences at Hinkley Point as well as at other EPR sites in France and Finland.

In Stage 3 documentation, much was made of the addition of the controlled caravan site for 400 caravans (~600 workers) being added to the plans to further mitigate the requirement for private rented and tourist accommodation based on the maximum 5,600 on-site workers.

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EDF NNB's recent report on accommodation at Hinkley Point shows that the two campuses are far from full. The campus next to the site which has been operating the longest is only 70% full with 380 out of 550 spaces filled and Bridgewater less than 11% full with 106 out of 1,000 spaces filled with a total of ~4300 working on site at the time of the survey.

Overall only 31% of HPC campus spaces are filled. If this occupancy rate were to be replicated at SZC, at this stage in the development, it is equivalent to an additional 750 non-home-based workers looking for accommodation within the community, which will increase further as the maximum of 5,600 workers is reached.

Stage 3 Volume 1, Figure 4.4 shows that should an increase to 7,900 peak workers become reality, as is now being discussed at Hinkley Point, all the extra required accommodation is expected to be provided through increased use in the private rented sector, tourist sector and by extensions to existing private caravan sites currently used for tourism.

Moving from 285 to 795 tourist sector spaces and from 430 to 1,195 private rented sector spaces, an overall increase of 180%, will have a significant impact on the area which, according to EDF NNB, will require "...mitigation via an enhanced Housing Fund and/or more stringent Accommodation Management." However, there is no additional provision proposed by EDF NNB and they state that one of the main purposes of the housing fund is to bring unused houses back into use, of which there are few in East Suffolk, and an increase to the number of houses of multiple occupancy. A situation that is already causing considerable parking and disturbance issues in Bridgewater and other communities around Hinkley Point.

Stage 4 consultation documents which raised the possibility of a transport strategy in between the previous "Road Led" and Rail Led" strategies, called the "Integrated Strategy", only considered the 7,900 on-site worker maximum and makes no mention of the previous "central case" 5,600 workers. It did not further consider socio-economic impacts and would appear to indicate that an increase in workers is inevitable in any final DCO submission, without any reflection in requests for Scoping Report Opinion from PINS.

Our conclusion, therefore, is that EDF NNB's consultations with the public have been, at best, inadequate and, in the case of maximum on-site workers, potentially misleading without a full analysis of the possible consequences in areas other than transport.

TEPC are of the opinion that as the second Scoping Report was clearly written in parallel to the Stage 3 Consultation documents:

- there was insufficient time following closure of the Stage 3 Consultation to adequately reflect on feedback obtained in the consultation
- subsequent inclusion of a third transport strategy was not submitted in the scoping report
- the realisation that the 5,600 maximum on-site worker numbers are likely to be increased to 7,900 and that this is not reflected in any Scoping Report

EDF NNB should be required to submit a further Scoping Report and request for opinion based on these significantly changed circumstances.

Following that, a further consultation should be entered into with statutory consultees and the public where these changes are properly called out, with consequential impact assessments and EDF NNB mitigation elaborated prior to the acceptance of any DCO application.

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EDF NNB's current approach of relying on the local community to cope with this increased accommodation requirement for workers is unacceptable and shows a complete lack of responsibility and care for the impact on the existing economy of East Suffolk.

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We note that under point 19 of the official guidance, it is stated:

Without adequate consultation, the subsequent application will not be accepted when it is submitted.

We contend that the public consultation has lacked rigour and, as an exercise in allowing the public to make informed comment on proposals, has failed to meet official guidance or the objectives contained within the Statement of Community Consultation and in terms of the potential maximum worker numbers has been inadequate and misleading.

We feel it is important that we raise these concerns now and urge you to take them into consideration whenever EDF NNB decide to submit their SZC DCO application.

Yours faithfully

Sharon Smith
Clerk to Theberton and Eastbridge Parish Council

Copies to:

EDF Energy - Sizewell C

[REDACTED] MP
[REDACTED] – Suffolk County Council
[REDACTED] – East Suffolk Council
[REDACTED] – East Suffolk Council
[REDACTED] – East Suffolk Council
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