

FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

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20 February 2020

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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 Farnham with Stratford St Andrew Parish Council.

During the pre-application process for the project 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 the parish council 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.

The parish council remains 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.

Clerk: Debbi Tayler

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Chair: Ian Norman

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FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

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.)

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 the parish council is 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.

Following our responses to Stages 1 and 2 of the public consultations EDF put forward plans at Stage 3 for a bypass around the villages of Farnham and Stratford St Andrew that will take traffic away from the already overloaded A12 and the 45 degree narrow bend in Farnham. At this point we still had concerns over the route proposed and the information provided by EDF. In particular we cited the following:

Routing past Farnham Hall and Foxburrow Wood

In our response to the Stage 2 consultation we recommended that the two-village bypass should go to the east of Foxburrow Wood, rather than the west. This is still the parish council's position.

Misleadingly, EDF's Stage 3 documentation refers to "Farnham Hall" as if it is a single property, when it is actually a loose collection of 12 residential dwellings – five of which fall within the curtilage of Farnham Manor's Grade II listed status. These currently enjoy a peaceful country setting, with little noise or light disturbance. The same is also true of nearby Farnham Hall

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

Farmhouse and Mollett's Farm (which has, in addition to the residential dwelling itself, six self-catering holiday homes and a five-pitch touring caravan site).

Foxburrow Wood – referred to locally as “the ancient wood” and “the Bluebell wood” – is much loved by parishioners, contains a network of publically-accessible paths and is designated as a County Wildlife Site (CWS). Farnham Hall Farmhouse lies directly at its south-west corner and the nearest “Farnham Hall” property boundary is around 145 m to the west, across an arable field.

EDF has proposed a two-village bypass route to the west of Foxburrow Wood which passes through this narrow gap and then cuts through the tree-lined track between Farnham Hall Farmhouse and “Farnham Hall”.

As well as being the sole means of vehicular access for Farnham Hall Farmhouse, this track is a Public Right of Way (PRoW) footpath, is used by local horse owners and is the primary means by which parishioners access Foxburrow Wood and the popular circular walks via Mollett's Farm and Friday Street Farm, as well as to the Greenwood Burial Ground.

Photographs of this track and some of its veteran trees were provided.

EDF makes a misleading statement in 7.2.25 of their Preliminary Environmental Information when stating “the closest properties in Farnham are over 500m from the proposed route.” The proposed route would in fact place all twelve of the above-mentioned “Farnham Hall” properties and two others within 200m of the centreline of the carriageways, before any account is taken of the road's final width or the footprint of each property and their gardens. Real-life separations may be as small as 50m.

We consider that EDF's suggested route to the west of Foxburrow Wood will:

- i. Adversely impact the setting of Grade II listed heritage assets,*
- ii. Cause the above residents to be exposed to high levels of noise, dust, emissions and light pollution – both during road construction and operation,*
- iii. Destroy their current rural landscape setting and views,*
- iv. Impact locals and visitors using the PRoW,*
- v. Sever the sole access to one of these properties.*

Are there any alternatives?

*Engineering studies conducted on behalf of the Highways Agency in 1995 clearly demonstrate that it is possible to build a road to the east of Foxburrow Wood – thereby avoiding many of the issues highlighted above. **Appendix B** is an extract from one of their “Option 14” drawings showing a dual-carriageway running south from Friday Street towards the Alde Valley.*

*This has been used to create a sketch diagram showing an alternative to EDF's “Two Village Bypass” proposal, which can be found in **Appendix C**. This route passes to the east of Foxburrow Wood.*

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

Approximate heights above sea level are included to allow likely gradients of a road built at ground level to be assessed. Steep gradients will greatly increase noise and air pollution caused by traffic having to climb out of the Alde Valley or away from Friday Street whilst accelerating away from the proposed roundabouts – particularly the HGVs which form a significant part of EDF's plans to construct Sizewell C. Shallower gradients would reduce those effects.

We have noted Suffolk Coastal District Council's approval of an application to construct a reservoir on land to the north east of Pond Farm, Farnham (planning reference DC/18/0322/FUL). It's location has been indicated on the sketch map.

Our suggested route to the east of Foxburrow Wood passes through part of a narrow and ragged strip of woodland called Palant's Grove, which varies in depth between around 20 m and 45 m thick at that location (its western extremity).

Palant's Grove is separated from Foxburrow Wood by a PRow footpath, but is not itself publically accessible. Historical and ecological assessments commissioned by the Highways Agency in 1992 and 1994 respectively stated that Palant's Grove had its origins "at the end of the 18th Century", "ground flora is of good quality", but "is of poor structure, with much dead and fallen timber."

*We have included the historical assessment of Foxburrow Wood and Palant's Grove as **Appendix F**. Photographs looking through and into Palant's Grove from the PRow are included in **Appendix E**.*

We note that the Foxburrow Wood CWS extends east to include Palant's Grove, but that the level of non-statutory protection this affords is limited and "should be commensurate with the level at which the site is designated (i.e. international, national and local)." Suffolk Coastal District Council's Local Plan also states that:

"Whilst these designated areas are provided with protection, the potential exists nonetheless for all new developments to look at ways of increasing or improving areas of biodiversity and/or geodiversity importance, providing a net gain of biodiversity and/or geodiversity and enhancing the green infrastructure network."

We consider that EDF is quite capable, if it chooses, of finding ways to mitigate any effects to the CWS. Enhancing the existing ecological connectivity between the ancient woodlands of Foxburrow Wood and Pond Wood would be a natural first choice and provide a lasting legacy benefit for the parish.

*A list of properties directly affected by these road proposals can be found in **Appendix D**.*

Indications of occupancy are provided (where known), along with approximate distances from the centre of each property to the centre of the existing A12; as well as to EDF's "Two Village Bypass" and to the alternative route to the east of Foxburrow Wood. Colour-coding has been used to highlight the closeness of the various roads to each property – which we believe provides a good indication of the likely severity of real-world impacts to them.

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

The following is a summary of the key metrics when comparing the suitability of the two bypass routes:

	Bypass to West of Foxburrow Wood (EDF's proposal)	Bypass to East of Foxburrow Wood (our proposal)
Number of residential properties adversely affected (centre of building closer than 200m to centreline of road)	14	3*
Number of residential properties significantly affected (centre of building closer than 150m to centreline of road)	5	1
Difference in ground level between Friday Street and highest point on route (near Pond Barn Cottages)	7 m	4 m
Difference in ground level between the Alde Valley and highest point on route (near Pond Barn Cottages)	22 m	19 m
Number of sole vehicular accesses severed	1	-
Number of PRow footpaths severed	4	3
Affects the proposed reservoir adjacent to Pond Barn	No	No
Length of route	2.4 km	2.8 km

** = It should be noted that despite appearing in this column, two of these properties will still be better off with this eastern alignment as it places the bypass further away than the EDF proposal.*

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

We consider that EDF's suggested route between the 12 dwellings at "Farnham Hall" and the ancient woodland of Foxburrow Wood has been based on cost, without fully considering the effects it will have on those residents adversely affected or attempting to find solutions to eliminate or minimise those impacts. We feel that the overwhelming 'greater good' will be served by a bypass alignment to the east of Foxburrow Wood and strongly urge EDF to re-consider their choice of route.

In spite of the parish council's evidence at Stage 4 the proposed route is still shown as running to the west of Foxburrow Wood thus adversely affecting many more properties than if it had been planned to the east.

Our Stage 4 consultation response stated:

We are wholly dissatisfied with EDF's intransigence in continuing to single-mindedly pursue a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment which has the support of our residents, this parish council, our neighbouring Benhall & Sternfield Parish Council, our County Councillor and others.

Appendix A is a high-level drawing showing the alternative route previously included in our Stage 3 response.

Now that EDF are aware that: 1) an alternative bypass alignment exists, 2) is technically possible (as demonstrated by Highways Agency "Option 14") and 3) is well supported (as evidenced in our Stage 3 submission and by the many representations received since then), we call on them to treat this option with the same seriousness as their own suggestion – a seriousness which they have not yet demonstrated.

We maintain that the 'greater good' will be served by an eastern alignment, particularly when the cost to human health and well-being is taken into account – as it surely must be.

Balanced comparison of the two options

In our Stage 3 submission we highlighted that should the bypass go to the west of Foxburrow Wood (EDF's suggested route) then:

- 19 residential properties (and three business properties) will see the A12 move closer to them,
- 14 of these residences will be adversely affected by the new road's proximity (including Grade II listed Farnham Manor and the five dwellings which fall within its curtilage),
- Five of them will be significantly affected.

Conversely, should the bypass go to the east of Foxburrow Wood (our suggestion) then:

- Only three properties will be adversely affected (two of which will nonetheless be better off than with EDF's proposal),
- Of these, only a single dwelling will be significantly affected (a bungalow in isolated countryside that is only occasionally occupied).

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

We also highlighted constructional and in-life benefits of an easterly route, as well as beneficial implications for vehicular access to properties and preservation of Public Rights of Way. None of these factors have been acknowledged by EDF at Stage 4.

We strongly believe that our main issue – the routing of the proposed Two-Village Bypass – has been ignored with no concrete reasons or evidence provided to support EDF's proposal in preference to ours.

Evidence that EDF are failing to give the same level of scrutiny to both options is being clearly demonstrated in their words and actions. Archaeological excavations are currently being undertaken exclusively along their preferred route; with no sign of intent to do the same along the alternative alignment. This implies that a decision has already been made about which route to proceed with. In the absence of such information, how can balanced and informed decisions be reached prior to a DCO application being made?

We are also very concerned that the Environmental Impact Assessment Statement will not be available until after this stage of the public consultation has concluded. This is entirely unacceptable and prevents us and others from making meaningful and informed comparisons and judgements.

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.

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.

Clerk: Debbi Tayler



Chair: Ian Norman



FARNHAM WITH STRATFORD ST ANDREW PARISH COUNCIL

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.

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.

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.

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

Debbi Tayler
Parish Clerk
Farnham with Stratford St Andrew Parish Council

Clerk: Debbi Tayler



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Copies to:

EDF Energy - Sizewell C



Suffolk County Council

East Suffolk Council

East Suffolk Council

Suffolk County Council

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Clerk: Debbi Tayler



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