

GREAT BEALINGS PARISH COUNCIL

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Clerk to the Council:



Date: 17th March 2020

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

Dear Sir

Re: Sizewell C Nuclear Power Station

I am writing on behalf of Great Bealings Parish Council.

During the pre-application process for the above, we have become increasingly concerned about the lack of detail provided by EDF Energy, the developer, and the total lack of response to our comprehensive submission to EDF dated 20th March 2019 (Copy attached). This has made it extremely difficult for us to judge whether their conclusions regarding impacts and/or proposed mitigations are correct, as insufficient evidence has been supplied during the four public consultations. We have asked for more detailed information specifically in ` -`

Bearing in mind the extreme sensitivity of the proposed site at Sizewell, its proximity to RSPB Minsmere with its European and International designated habitats, and the fact that at least 9 hectares of the Sizewell Marshes Site of Special Scientific Interest would be lost, it is crucial that we are given the information necessary to make informed responses to these consultations. To date this has not been the case.

It is our understanding that National Infrastructure Projects should be 'front-loaded' during pre-application, so that problems can be identified and appropriate avoidance/mitigation/compensation strategies can be identified and agreed at an early stage and so that the Examination can therefore be held within the prescribed time frame. Indeed, this is clearly stated in 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.

Baseline information material and surveys are referred to in the Preliminary Environmental Information documents, but these have not been made available during the consultations and we are told that these will only be made available at publication and acceptance of the Development Consent Order (DCO). We cannot therefore say that the pre-application procedure has been transparent – quite the contrary. During the four stages of consultation, EDF have insisted that: ‘We only have to provide *preliminary* environmental information.’ This shows that EDF have not properly understood that in order to make informed responses to their consultations, we need to be given sufficient detail. Responses from statutory consultees including Suffolk County Council, East Suffolk Council and the Environment Agency amongst others have all made similar representations throughout the four-stage consultation period.

Under paragraph 19 of the above guidance document, in reference to the pre-application consultation process, it 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.

We refer you in particular the following points raised in our earlier submission which remain unanswered:

- An appropriate cost benefit analysis of the upfront disruption costs as set against the long term value of the power output of the development. This should clearly compare the benefits, or otherwise, of the Sizewell project against the falling costs of solar, wind, storage, grid, and other developments the costs of which are falling sharply while the cost of this proposal continues to rise.
- A Suffolk-wide road transport strategy that reflects the impact of the extended construction period, especially in the context of Suffolk’s important tourist industry. This analysis should not be on a steady state basis, but must consider the peak traffic periods when construction workers will be returning home for the weekend at exactly the same time as weekend visitors are arriving in the area. This analysis is especially important given the withdrawal of the Ipswich Northern Relief Road scheme. Great Bealings is heavily exposed to traffic seeking routes around Ipswich and this gives us a material interest in the Sizewell proposal.
- The continued use of road when rail and marine options have not been fully explored or costed.

EDF NNB’s lack of transparency and their unwillingness to provide adequate detail to us has prevented us from making an informed response to the consultations. As a result, we believe that this application has not reached an appropriate stage for examination of the DCO.

As indicated above, we are not alone with this view. Most of the consultation responses that we have seen have emphasised the lack of necessary detail and the difficulty of making properly informed assessments of the proposals. Without sight of crucial relevant surveys and analysis of the issues raised by us and many others in advance of DCO submission, we cannot say that EDF has engaged with us effectively. Yet 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.

Our conclusion, therefore, is that EDF NNB's consultations have been inadequate. 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.

On this basis alone, it is unacceptable that these proposals should proceed to a DCO.

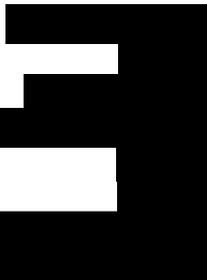
Yours faithfully,

Mrs D P Knights
Clerk to the Council

cc. Theberton and Eastbridge Action Group

GREAT BEALINGS PARISH COUNCIL

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Clerk to the Council: 

20th March 2019

Response to Sizewell B Consultation

This response is written under the headings set out in the consultation paper. Where we have concerns as to the assumptions, proposals, and supporting information contained in the consultation paper, we have shown them in bold type as a **Challenge** to the basis of the proposals as put forward. As these proposals stand, and in the light of our concerns, **we consider that the consultation process is materially at fault and fails to grapple in sufficient detail with the overarching strategic needs of the area.** We would expect that each of these challenges will be addressed if necessary by a further stage of consultation, but in any event we believe that there should be a specific response to each of our points. **Failure to address the points raised would constitute a failure of the consultation process and could render any approval invalid.**

1. Overall Proposal

Great Bealings Parish Council (GBPC) is not in a position to evaluate nuclear power versus the options and therefore we have written this response to reflect our specific concerns in relation to the proposals.

We understand that the EPR in Taishan in China only went operational in December 2018. Olkiluoto in Finland has been delayed until 2020 at the earliest, and Flamanville in France has also been delayed due to significant design issues. There are therefore no EPR reactors operating satisfactorily anywhere in the world apart from Taishan and no experience yet exists of the safety and other issues raised by this design. EDF themselves have admitted that, for France's own recently announced energy transition strategy, significant design review is required. It seems premature to proceed with Sizewell C if this remains the case.

The National Infrastructure Commission, reflecting emerging regulatory tightening, now requires that such a major project must be assessed in its overall context. We would argue – see our detailed comments below - that the proposals put forward do not provide a convincing argument that the benefits outweigh the risks and costs. In particular we consider that to site Sizewell C on the Suffolk coast is inappropriate given the social, economic, and environmental impact on the area. This is an AONB which may not have the immediate visual impact of, for example, the Lake District, but which by its very nature is particularly

vulnerable. Suffolk County Council (SCC) has produced an excellent paper – Suffolk’s Nature Strategy – which makes the point that the environmental qualities and the wider amenity value of the Suffolk countryside are a ‘common good’. That is to say they have an economic value that belongs to all of us.

Tourism is worth some £2 billion per annum to Suffolk’s economy. Your proposals are recommended on the basis that there will be a net benefit of some £100 million per annum. Presumably this is on the basis of the steady state operational benefit and therefore discounts the massive up-front disruption during the construction phase. While we accept the potential employment, apprenticeship, and other benefits that could arise, we are concerned that they are not sufficient to justify the long term steady state value, still less the risk and disruption of the construction process. Such risks and costs lead to the inescapable conclusion that the project would not meet any properly constructed sustainability assessment.

Challenge 1: The cost/benefit analysis should be re-run on an appropriate net present value basis to show the true value of the disruption costs as against the long term operational benefits. This analysis should show the impact of a 2, 3, or 5 year delay in achieving operational status.

2. Main Development Site

Given the points made in 1 above, we are of the view that a further development of this size on the Suffolk Coast has not been adequately justified. Its impact on the wider environment would be excessive and the disruption caused by 15 years of construction may be irreparable.

3. People and the Economy

Suffolk’s economy is diverse but tourism is a major contributor. Economically Suffolk benefits from being at one end of the Felixstowe/Cambridge/Midlands corridor, as a result of which major investment is required in the road network. At the same time Local Authorities in the region are being required to update their Local Plans to accommodate a large increase in housing: some 10,000 units in the Suffolk Coastal area alone over the next 20 years. Adding Sizewell C can only exacerbate the issues faced by the county as it struggles to deal with these developments. It is notable that your consultation document makes no mention of any Local Plans that are currently being revised, specifically by Suffolk Coastal District Council (SCDC). Nor does it deal with the question of an Ipswich Northern Relief Road, a matter that is getting increasing attention. This lack of a joined-up approach is deeply concerning and leads us to question whether the results of the current consultation would be procedurally valid.

Challenge 2: The traffic assessments should be re-run to model the impact on the local road network of the full housing allocations contained in the draft SCDC revised Local Plan.

Challenge 3: The consultation fails to consider the impact of the Ipswich Northern Relief Road and the major role this will play in altering traffic patterns.

The Suffolk coast is one of the primary drivers of the region's tourist industry and this proposal cannot but have a major impact, both visually and in terms of the character of the area. Equally important is the presence of nationally important wildlife sites such as Minsmere and the fens around Lowestoft. SCC further makes the point that the understated and gentle river valleys of Suffolk make a significant contribution to the landscape quality of the county: an attribute that is both an amenity for those who live here and for those who choose to visit. This proposal directly threatens both Minsmere, the Lowestoft marshes, and the Alde and Deben valleys (see also comments on transport proposals below) and this threat is not adequately analysed.

Challenge 4: The consultation suggests how these impacts can be mitigated but does not assess the scale of damage likely to be caused. Significantly more detail is needed to evaluate both the threat and the proposed mitigation strategy for these important areas of the natural environment. Specifically the excavation of the crag layer required to meet the demand for aggregates during construction has not been tested to assess the impact on the water table.

4. Accommodation Strategy

Your proposals assume a peak workforce of some 6,000 but you recognise that this could be higher, perhaps as much as 8,500. It is not clear how you have made your assumptions in relation to the needs of this workforce. You state that one third of this number would live in the area and two thirds would require temporary accommodation. That equates to a requirement for some 5,500 units, but the campus only has capacity for 2,400, less than half what is required. The caravan park provides a further 400 pitches. This leaves a requirement for 2,600 units/bedspaces to be provided by the local community through self-catering accommodation, B&B lets, spare rooms, etc. None of this allows for partners who might wish to accompany the workforce. This could increase the requirement by perhaps 50% to 4,000 units or more. In an area where accommodation is limited and the tourist market mops up a large proportion of availability, this could cause serious distortion to the market.

Challenge 5: There is no fairly based assessment of currently available accommodation against which to measure the needs of the construction workforce. Without this assessment the impact on availability and cost for both residents and tourists cannot be predicted. Given the ever-increasing need for single family units this factor could be materially damaging to the socio-environmental character of the region. This assessment needs to consider the impact of a delay in construction and the potential for the number of workers to increase to allow for dependents.

We would further question your assumption about the commuting appetite of the one third of the workforce who are assumed to live within reach of the site. You state that a commuting time of 90 minutes - three hours a day assuming you mean 90 minutes each way - might be acceptable. This is the same as living in Ipswich and working in London. It assumes that these workers will commute from as far afield as Colchester, Bury St Edmunds, Ipswich, Lowestoft, Yarmouth,

and Norwich. These journeys would create a far greater impact on traffic than your tables in section 4 indicate.

Challenge 6: We are not satisfied that the traffic increase assumptions fairly reflect the significant journey lengths predicated in the consultation paper. More information is also required on how EDF would implement effective traffic control systems (see also Challenge 7 below).

While we have limited insight into how a major project of this nature deals with labour requirements, we can see that however the need is met, the traffic implications would be significant, not just because of the commuting needs of the 'local' workforce, but also because of the inevitable weekend commuting patterns for those who are in temporary accommodation. This aspect is not mentioned in your analysis. Equally you make no assumptions about the day to day needs of the workforce for deliveries of food and household goods by white van. The way these services are provided in the real world will inevitably produce a significant increase in traffic which is not covered by your analysis.

Challenge 7: The consultation proposals make no allowance for either the increase in 'white van' traffic which will be the inevitable result of this huge influx of people – short term or long term – and the proposals contain no evaluation of the impact of 'peak' stress periods such as Friday afternoons, holidays, etc., when tourist and residential traffic will significantly increase the number of vehicles. The proposals offer no analysis of these peak stress periods on minor roads in the area already well used as 'rat runs'.

5. Accommodation – campus and caravan site

No specific comments. See 4 above for response to Accommodation Strategy.

6. Transport – materials

We have no experience on which to judge your proposals, however we understand that some of the aggregate required for the huge volumes of concrete which the site will need is not available locally. If this means that it will have to be transported over much greater distances, your assumptions will be wrong.

Challenge 8: Please show the impact of varying proportions of the required construction materials having to be delivered over much longer distances.

7. Transport – Sizewell halt

8. Transport – Buckleswood Road

9. Transport – Level crossings

10. Transport – Level crossings (rail led)

For 7, 8, 9, and 10, see 11 below.

11. Transport – Road led, freight management

As with every such study carried out over many years, you assume that road will be easier to deliver and give EDF greater flexibility. This is despite the fact that some enhancement will have to be carried out to the rail links, whether or not additional lines are built. It is a well-proven fact that rail lines cause less

environmental harm than roads but this is ignored by your assessment. Specifically in Table 5.4 (entitled 'Pros and Cons') you list the 'pros' but you do not even mention the 'cons'. This is a serious omission, further weakening the case for the option you may select based on this consultation.

Challenge 9: It is not clear that the assessment of road versus rail will be carried out on a 'level playing field' basis. For many years roads have been considered preferable and generally speaking have obtained a far higher proportion of development funding, while rail is required to show that it can be made to pay through fares and access charges. The economic case for rail has thus been habitually and unfairly penalised. Your consultation should contain an evenly based assessment model to demonstrate that you have assessed road versus rail on the basis of a robust economic model, which should include a proper assessment of the short and long term environmental impact of both options.

We do not believe that the case for the removal of the maritime option has been convincingly made. Weather could mean that it might get interrupted occasionally but, despite the piling required, it is hard to see why it would cause more damage than the road alternative. We need to see much more detailed analysis of why this option has been removed. The coast will repair itself over time – the local landscape will not.

Challenge 10: The maritime delivery option has been removed for reasons of cost but, as noted above, a full analysis has not been given. The construction of a pier must be feasible, especially given the need to construct sea defences to mitigate against a repeat of the 1953 North Sea tidal surge and the attendant risk of inundation. You accept that some heavy equipment will still have to be delivered by sea in any event. North Sea platform technology should be considered before the maritime option is removed. It is stated that this piece of coastline is less vulnerable to erosion, but that is not to say that the natural action of wind and tide will not satisfactorily repair intrusion into the seabed over time. We would argue that this is a far more environmentally sensitive approach than building roads, from which there is no way back.

12. Transport – Park and Ride

The plans should contain an assessment of park and ride schemes in comparable infrastructure projects so as to demonstrate that such schemes actually work. Without that information any analysis of your proposals is meaningless.

Challenge 11: There is no evidence that such schemes work in comparable major infrastructure projects.

13. Transport – A12 two-village bypass

Your proposal to create a bypass for Farnham and Stratford St Andrew but not for Marlesford and Glemham is shortsighted. It will simply move the problem 2 miles to the west. It takes no account of the wider regional traffic problems; it is

a partial solution to a much bigger problem; it damages the Deben Valley with no obvious balancing benefits; and it leaves SCC with a huge problem.

Challenge 12: It is misleading to evaluate your 'two-village' solution without considering SCC's wider road strategy and the impact of increased housing under draft Local Plans. We would argue that this consultation is manifestly unfit for purpose by ignoring these issues and should be re-run when appropriate discussions have taken place between EDF and SCC so that a fully tested joint road strategy can be developed.

14. Transport – Road improvements

As a Parish Council which now has a 'made' Neighbourhood Plan, and which is situated between Ipswich and Woodbridge, this is of direct relevance to us. In the absence of an Ipswich Northern Relief Road, the minor roads through our village – specifically Boot Street - are used as 'rat runs' to avoid traffic delays closer to Ipswich. These 'B' roads already act as the 'de facto' Northern Relief Road. In many places they are too narrow to allow two HGVs to pass one another, leading to significant delays. Despite repeated requests, SCC will not sanction an increase in the speed restriction area or alternative traffic calming measures due to cost pressures. This situation will only get worse. It will not be affected in any way by your proposed two-village bypass, which leaves the whole question of the A12/A14 capacity and bottlenecks unanswered.

See Challenges 6, 7, and 12 above.

Summary

The fact that your consultation does not contain a proper present value analysis of the benefits versus the disruption costs, does not fully explain why the maritime option has been dropped, fails to assess the need for and the impact of an Ipswich Northern Relief Road, fails to consider a wider road strategy in tandem with SCC, and fails to make clear that all these issues need to be assessed in parallel, renders it not fit for purpose. This is exacerbated by the points made above, specifically in relation to traffic volume assessments, accommodation requirements, and the lack of consideration of issues currently being assessed in the context of SCDC's draft Local Plan.

15. Consultation process

For the reasons set out in the above summary paragraph above, we consider that the consultation process is materially at fault and fails to grapple with the overarching strategic needs of the area. It thus fails in its fundamental requirement as set out by the NIC to assess and evaluate this proposed development in its overall context.

Charles Barrington

Dee Knights

Chairman: [REDACTED]

Clerk: [REDACTED]

[REDACTED]