

Clerk Jane Page CiLCA



hachestonparishclerk@gmail.com

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



18th March 2020

Dear Sir/Madam

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

I am writing on behalf of Hacheston Parish Council (HPC).

During the pre-application process for the above we have become increasingly concerned about the lack of environmental impact and traffic movement detail, as well as justifications for options chosen by EDF, the developer. This has made it extremely difficult, or impossible in some cases, for us to assess whether the conclusions EDF have reached regarding impacts, are correct or otherwise, as insufficient detail has been supplied during the 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.

It is our understanding that National Infrastructure Projects should be 'front-loaded' during pre-application. This is so that problems can be identified at an early stage, and avoidance/mitigation strategies can be agreed.

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).

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, HPC are of the opinion that the pre-application procedure has not been transparent.

During the four stages of consultation, EDF have stated that they only have to provide preliminary environmental information. This indicates that EDF has not properly understood that in order to make informed responses to their consultations, the consultees need to be provided with sufficient detail to give due consideration to their proposals.

We are not alone in having this opinion.

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.

At each consultation stage we have requested further information which has not been forthcoming. We have questioned the siting of the Southern Park and Ride (SP&R) and suggested an alternative location, we have requested details of proposed traffic movements to and from the SP&R, together with details of traffic movements from the Park and Ride sites at the Hinckley development which would enable us to compare traffic movements. We have also requested details of lighting at the SP&R and EDF's projections on air and noise pollution. We have not been given any insight as to the reasons behind the choice by EDF to site the SP&R at Hacheston, nor have they supplied any further information in response to the concerns that we have raised in each of the four consultations.

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, and one which will have a severe detrimental effect on inhabitants of Suffolk whilst the construction work is in progress. As a result, it is vitally important that EDF provide clear and well structured information on their pre-application consultations so that organisations such as ours can come to an informed position.

EDF lack of transparency and willingness to provide adequate detail to us as consultees, 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. Without sight of crucial surveys, well in advance of DCO submission, we are unable to say that EDF has engaged with us, and other consultees, effectively.

Finally, we note that under point 19 of the pre-application guidance document, it is stated:

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

It is not accepted by this Parish Council that there has been adequate consultation by EDF, and therefore any application submitted by EDF should be treated accordingly.

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

Yours faithfully

Jane Page

Jane Page
Clerk to Hacheston Parish Council

Copies to:

EDF Energy - Sizewell C

- Suffolk County Council
- East Suffolk Council
- East Suffolk Council
- East Suffolk Council

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