

PROPOSALS FOR THE DEVELOPMENT OF WEST BURTON C (EN010088):
THE FORMAL RESPONSE OF BOLE VILLAGERS FOR DEADLINE 2,
TOGETHER WITH THE APPLICANT'S RESPONSE FOR DEADLINE 4

1. BACKGROUND

On Wednesday 12th June 2019, there was a public consultation in the village of Bole about EDF Energy's proposal to develop a new gas-fired electricity generating power station within the boundary of the existing West Burton power station site, near Gainsborough, Lincolnshire. EDF Energy's application was submitted to the Secretary of State for Business, Energy and Industrial Strategy – via the Planning Inspectorate – on 30th April 2019 and accepted for examination on 23rd May 2019.

2. DRAFTING OF THE RELEVANT REPRESENTATION

At the public consultation on Wednesday 12th June 2019, it was agreed that the most effective way of communicating Bole villagers' concerns about EDF Energy's proposal was for individual villagers' responses to be aggregated. James Naish, the District Councillor for Sturton Ward, offered to anonymously gather resident comments and document these.

Bole residents were generally opposed to the proposed development of West Burton C by EDF Energy. Typical comments included "*totally against any development on the West Burton site*" and "*strongly prefer planning to be refused*". In almost all cases, however, residents provided a balanced response.

The following themes were identified as key resident concerns in both written and online responses, and represented the village's collective position:

- a) excessive traffic volumes;
- b) parking at the entrance of the village;
- c) visual, light, noise and environmental impacts.

3. BOLE VILLAGERS' REQUESTS OF EDF ENERGY

In the interests of open dialogue with EDF Energy, Bole villagers compiled a list of small but meaningful actions which they believed EDF Energy could deliver as part of the planned development. There were six requests in total.

These requests were not perceived to be financially prohibitive for EDF but would make a big difference to the lives of Bole residents if West Burton C goes ahead. The key items are noted in on pp.2-5 of this document.

The Relevant Representation was submitted in line with the Planning Inspectorate's deadline at the end of August 2019.

4. Q3/4 DIALOGUE WITH EDF ENERGY

Since the submission of the Relevant Representation, there have been several discussions with EDF Energy about Bole villagers' requests. These discussions have been constructive and we would like to thank EDF Energy for its openness and willingness to engage.

The company's proposed responses were discussed with villagers on the evening of 17th December 2019 and their views are recorded in the third column of the table below:

Original request	EDF Energy's proposal	Bole villagers' response	EDF Energy's Response
1. We would like EDF Energy to commit to working with relevant local authorities and regulatory bodies to do everything within its power to limit, and ideally stop, Bole lay-by being used by construction-related traffic. This should be a top priority	If the project goes ahead and to address points 1 and 6 here, EDF agree to contribute of up to a total of £[REDACTED] towards reasonable costs for investments to reduce traffic impacts from the outset of the project, such as a camera on the	This proposal was welcomed by Bole villagers who would look to other authorities (e.g. Bassetlaw District Council and Nottinghamshire County Council) to match funding where appropriate to meet the desired objectives.	We understand that our proposal is agreed; the funding is additional to the community fund and is up to £[REDACTED] covering items 1 and 6. The lay-by and its use are outside of EDF's control but all construction-related traffic will be managed through the Construction Traffic Management Plan and Construction Workers' Travel Plan that will be prepared by the

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<p>from the moment planning is approved, and we would like EDF Energy to commit to throwing its legal expertise behind this matter if needed. We would like this lay-by to be closed permanently if possible.</p>	<p>layby and/or an HGV sign. This is on the understanding that this infrastructure would be installed, operated and maintained by others.</p>	<p>It was noted that further funding might be required if there were genuine, unexpected grievances resulting from the proposed build. Such issues would be raised via the Community Liaison Officer in due course. To be clear, all parties hope that this won't be necessary as a result of the proposed upfront investment.</p>	<p>contractor and approved by the local planning authority. EDF will also include within its construction contracts a restriction on the use of the lay-by by construction-related traffic (save in the case of an emergency).</p>
<p>2. To facilitate the above, we would like EDF Energy to commit to providing sufficient parking for all contractor vehicles on site, 24 hours per day. We would like this commitment – and a suitable site to be identified, with appropriate facilities – as part of planning application EN010088. We would also like correct geographical coordinates to be shared with all contractor vehicles,</p>	<p>Please see Planning Inspectorates website, Applicant's Comments on Relevant Representations/Document Ref. 8.2.</p>	<p>The proposal for onsite parking was welcomed by Bole villagers.</p> <p>However, it would like further assurances in writing (1) that the parking will be accessible to drivers 24 hours a day; (2) that drivers will be purposefully directed to this site; and (3) that appropriate facilities will be provided for drivers (e.g. toilets).</p>	<p>All construction traffic will be managed through the Construction Traffic Management Plan and Construction Workers' Travel Plan that will be prepared by the contractor and approved by the local planning authority. These will set out and formalise the measures to be employed to minimise construction traffic impacts on the local community. To answer the specific questions raised: (1) yes parking for workers will be available on site whenever works are ongoing, although we will not permit – and will not require- overnight lorry parking either on site or on adjacent roads. HGV deliveries will be restricted to the core construction hours of 7am to 7pm; (2) yes</p>

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to prevent HGVs getting stuck in Bole village.		On the assumption that all three of these points are met, this is a significant improvement vs. driver provision during the construction of West Burton B, and is warmly welcomed.	<p>drivers will be purposefully directed to site and to parking facilities on site; and (3) yes amenities will be provided for construction personnel on site but again no overnight stays are expected.</p> <p>We will put in place a Community Liaison Officer (as proposed in the Code of Construction Practice). The CoCP will be amended to ensure that if there were to be any traffic issues associated with the WBC project they could be addressed quickly at the time.</p> <p>The Applicant will ensure all contractors have correct geographical coordinates for the site.</p>
3. We would also like EDF Energy to commit to investing in the effective visual screening of all West Burton developments for the village of Bole, including West Burton A and West Burton B. Similar commitments were made when West Burton B was built but these were not – unfortunately – effectively implemented. It would be	The community fund of £██████ per year for each year of construction is intended to allow the community to invest in projects and could potentially be used to provide visual screening.	<p>Bole residents welcomed the idea of a community fund.</p> <p>However, there were concerns that £██████ per year would only cover the cost of between 10 and 25 mature trees per annum, which would have a limited impact on the desired screening. Residents also noted that they aren't</p>	<p>The proposed community fund relates to the WBC project alone and not the existing West Burton Power stations.</p> <p>Significant landscaping work was carried out, in accordance with plans agreed with the statutory stakeholders, when WBB was built. None of the agreed landscaping measures were intended to provide visual screening of WBB from the direction of Bole village. The planting will continue to establish over time.</p>

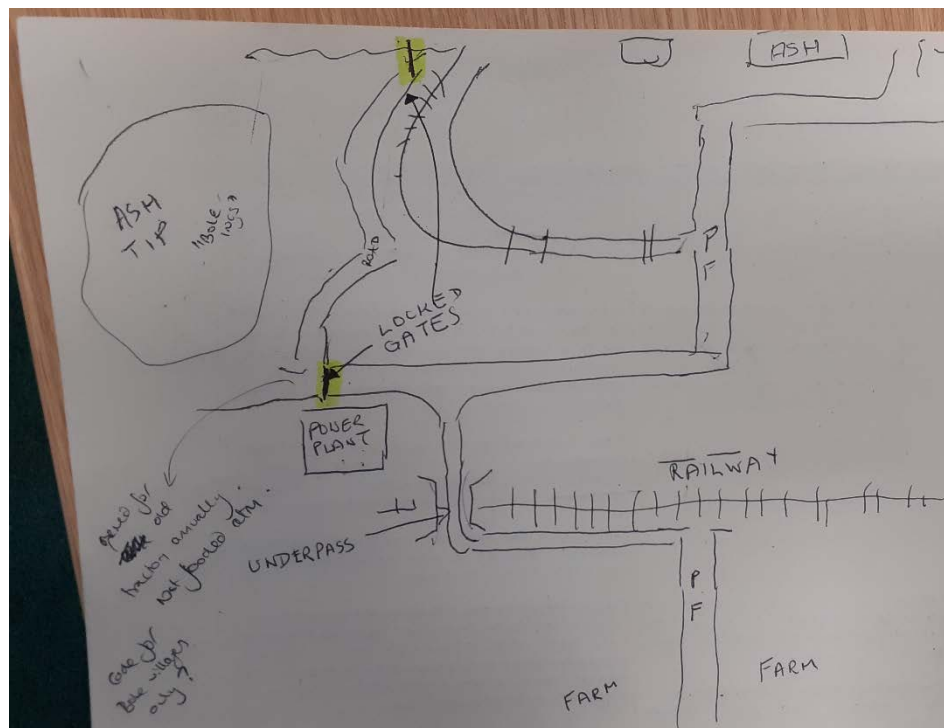
Original request	EDF Energy's proposal	Bole villagers' response	EDF Energy's Response
<p>unacceptable for this to happen again. Bole villagers would like to be consulted about such schemes as early as possible, and for them to be executed before on-site construction at West Burton C begins.</p>		<p>experts in such matters, and felt that EDF Energy should be assisting more directly in achieving the desired objective. Access to EDF land may be required to facilitate effective screening.</p> <p>Further thinking on this item is recommended.</p>	<p>The community fund is not specifically intended for visual screening and was put forward by EDF as a good neighbour to allow support for community projects which benefit the local community.</p> <p>The Applicant notes that National Policy Statement EN-2 accepts that <i>It is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable.</i> Consequently no planting has been proposed within the EDF site boundary as it is not considered that it would be of significant benefit.</p>
<p>4. There is appetite from Bole villagers to gain access to EDF Energy land east of the village for dog-walking and other recreational purposes. We would like EDF Energy to consult villagers about this specific matter and to do everything possible to enable access by removing and/or reconstructing fencing near the railway line.</p>	<p>This request came through earlier in the planning process from Nottinghamshire Council County, we have responded as part of the DCO Examination process and our response can be found on the Planning Inspectorate's website, please see, Applicant's Comments on Relevant Representations/Document Ref. 8.2.</p>	<p>In terms of a long-term, <i>non-financial</i> legacy from the build, Bole villagers are clear that this item is a priority.</p> <p>All the villagers would like is for two locked gates to be opened, so that they can have access to the redeveloped "Bole Ings" site. They propose that the x2 gates have a code which is shared <i>only with village</i></p>	<p>The map provided indicates that the land over which access has been requested is not within the WBC boundary area, but is connected with the existing operational West Burton A and B power stations. Having looked carefully at this, the land over which access has been requested is within the operational site boundary of the WBA and WBB power stations, and therefore granting such access gives rise to operational safety issues. EDF is therefore unable to grant the access requested.</p>

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		<p><i>residents</i> by the Community Liaison Officer, and that this code is changed regularly. The gates are currently opened annually for tractor rally access.</p> <p>See Figure 1 below which shows the site of the two gates that villagers would like limited access to.</p>	
<p>5. We would like EDF Energy to commit to reversing all plans for weekend work outside the peak construction period. Given the lengthy timescales for the overall build, the time-saving resulting from weekend work is likely to be minimal. Conversely, the impact on local communities will be considerable and should, therefore, be avoided.</p>	<p>During construction we will provide details of working patterns on the local community website site, this will be a responsibility of the Community Liaison Officer.</p>	<p>Bole villagers were understandably disappointed that weekend work cannot be curtailed. However, they recognise that extending the build time will also have negative impacts on the local area.</p> <p>They would like written assurances that “details of working patterns” will be published at least 30 days in advance by the Community Liaison Officer so that appropriate steps can be taken locally (for example, if</p>	<p>Working patterns will be updated on the website by the Community Liaison Officer as soon as reasonably practicable and where ever possible 30 days in advance of works (this commitment will be included in a revised CoCP submitted for Deadline 4).</p>

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		the church is being used for services or weddings).	
<p><i>(Note that this item was communicated by email, shortly after the deadline)</i></p> <p>6. HGV volumes through the villages has increased lately, for a number of reasons (quarry activities, increase in house building, increase in haulage businesses etc.). This isn't a problem, except a certain % of these vehicles are probably above the agreed weight limit. We hoped that Highways would fund a sign at Bole roundabout, on Gainsborough Road, emphasising the weight limit except for vehicles that need access to the power station. Unfortunately, we've been told that there's no funding. Given Highways' position, we were wondering if EDF Energy would consider funding a sign near the roundabout,</p>	<p>If the project goes ahead and to address points 1 and 6 here, EDF agree to contribute of up to a total of £■■■■ towards reasonable costs for investments to reduce traffic impacts from the outset of the project, such as a camera on the layby and/or an HGV sign. This is on the understanding that this infrastructure would be installed, operated and maintained by others.</p>	<p>This proposal was welcomed by Bole villagers who would look to other authorities (e.g. Bassetlaw District Council and Nottinghamshire County Council) to match funding where appropriate to meet the desired objectives.</p> <p>It was noted that further funding might be required if there were genuine, unexpected grievances resulting from the proposed build. Such issues would be raised via the Community Liaison Officer in due course. To be clear, all parties hope that this won't be necessary as a result of the proposed upfront investment.</p>	<p>We understand that our proposal is agreed; the funding is additional to the community fund and is up to £■■■■ covering items 1 and 6.</p>

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along these lines. It would support the wider traffic-related points in the [relevant representation from Bole villagers].			

Figure 1: Land to the east of Bole where residents would like access (see yellow highlighting)



Finally, there were a handful of points which were raised by residents attending the meeting which they would like EDF Energy to consider and respond to:

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N/A	N/A	Security patrols in the area by EDF Energy are generally well-received and it is hoped that these will continue during the build period and beyond. Bole residents would appreciate written assurances that this will be the case.	Comments on the security patrols are appreciated; these are associated with the operational stations and will continue for the foreseeable future
N/A	N/A	Has EDF Energy thought about offering discounted energy rates to residents in the immediate locality of the site? If not, would this be something that they would consider?	Unfortunately the Applicant is not able to offer such discounts.
N/A	N/A	Is there any clarity yet on the number of stacks proposed for West Burton C? There was some confusion in the room about whether there would be 1, 3 or 5 stacks.	There could be up to 5 stacks, the final number will not be known until detailed design of the plant has been completed prior to construction.
N/A	N/A	Is there any clarity on the proposed height of said stacks?	The maximum stack heights are included in the Environmental Statement. They will be up to 45m high above ground level. For reference this

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			is roughly the height of the turbine buildings on WBB, while the stacks on WBB are circa 75m high.
N/A	N/A	Is there any data on how many peaking / other plants are being built nationally?	The number of peaking and other plant built nationally will be determined by factors including: regulations and incentives, fuel prices, technology development, economic growth, commercial conditions and decisions taken by individual project developers. The Applicant is therefore not able to provide a specific response to this question. However Government projections indicate that additional peaking plant capacity will be required in the UK as intermittent renewable electricity generation increases.
N/A	N/A	Is EDF Energy committed to keeping local residents informed about progress? We would like to be kept informed if possible.	Yes, EDF will endeavour to keep the local community informed about the progress of the construction of the development through contacts with the local MP and councillors.
N/A	N/A	Notwithstanding EDF Energy's comments on p.37 of the "Applicant's Comments on Relevant Representations/Document Ref. 8.2", Bole villagers would like an understanding of the contents of the	We are unable to share these reports with anyone except for statutory consultees for confidentiality reasons. Although we recognise the understandable interest of local residents, it is not possible for us to provide copies of the reports even in the way proposed.

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		Badger Survey Report and the Breeding Bird Survey Reports. Could EDF Energy arrange for a printed copy of each survey to be sent to the District Councillor <u>for limited consumption only</u> (i.e. by 5-10 local villagers who have personal interests in preserving local biodiversity)? Printed documents could be destroyed within 10 working days of receipt if required.	
N/A	N/A	Can EDF Energy confirm where the Community Liaison Officer is likely to be based, once appointed? Is there an expectation that they will be based near the site and, if not, how often would they be present (roughly)?	No decisions have been made on where a Community Liaison Officer would be based or their working arrangements. This will be determined nearer to the time, taking account of the status of arrangements in respect of the West Burton A & B stations.

5. CLOSING REMARKS

As stated previously, the villagers of Bole and the residents of Sturton Ward understand that the area has an important role to play in energy production for the UK; and while we are generally opposed to the development due to the presence of two working power stations on the site,

we do not wish to unnecessarily impede EDF Energy's progress. We recognise that the company seeks to actively engage the local community about planned developments and appreciate these endeavours.

We trust that our latest feedback is received in good faith, and look forward to working closely with EDF Energy employees over the coming months once – as expected – planning application EN010088 is approved.

James Naish, District Councillor for Sturton Ward, on behalf of Bole villagers

18th December 2019