

Sizewell Parishes Liaison Group – Response to the EDFE Stage 1 Consultation on Sizewell C – February 2013

1. Introduction and context

- 1.1 This document has been prepared by the Sizewell Parishes Liaison Group (SPLG) in response to the suite of documents published by EDF Energy (EDFE) on 21 November 2012. This document has been drafted by the SPLG Steering Group, and discussed with the Town and Parish Council representatives to the SPLG. It represents the matters of general agreement between the members of the SPLG, and is separate from the individual submissions of local councils and interests.
- 1.3 The SPLG is a group of councillors from some 24 Parish and Town Councils, which surround the Sizewell nuclear power station site. Our aim is to encourage the EDF Nuclear New Build and other locally based energy industries to share financial responsibility for infrastructure and social provision needs in the local communities that we serve. The Group was set up in January 2009, and has followed developments at Sizewell since then. Further details can be found on the SPLG website:
<http://www.sizewellparishes.org.uk/about/index.php>
- 1.4 Appendix A summarises the contributions and involvement of the members of the Group contributing to this response.
- 1.5 The Group can be contacted through the Secretary, Malcolm Blakeney, or the Chairman, Jon Swallow.

2. Background

- 2.1 The Sizewell B nuclear power station caused considerable controversy during its planning in the 1980's, and considerable disruption during its construction during the eight year period between 1987 and 1995. It now represents a major source of employment in Leiston and the surrounding area, with some 750 routine operating staff, and many more during periodic maintenance. It is currently planned to operate to 2035, with a possible life extension to 2055. It forms a striking and widely visible feature of the Suffolk coastline. Decommissioning has started on the now closed down Sizewell A station, and the site will then be under care and maintenance for up to 100 years.
- 2.3 The Sizewell C site proposals are described in detail in the Stage 1 Consultation document. In summary, it is proposed to build two new nuclear reactors to the north of the existing Sizewell B power station.
- 2.4 EDFE propose to use the European Pressurised Reactor design developed by Areva NP – the first design to complete the UK's generic design assessment (GDA) process with the award of a Design Acceptance Confirmation from the UK's Office for Nuclear Regulation (ONR) and a Statement of Design Acceptability (SoDA) from the

Environment Agency. No power stations using this technology are yet operational. Taishan 1 in Guangdong China is currently expected to come into service in December 2013; the construction of the single reactor Flamanville 3 station in northern France was started by EDF in 2007, it was first programmed to start up in 2012, but is currently running four years late, and hoped to start in 2016, at a cost of 8.5 billion euros (£6,400 million) for a single reactor of about 1,600 MWe capacity.

- 2.5 The EDFE proposals for Sizewell C are understood to be for twin reactors with an installed capacity of 3,200 MWe, taking seven to nine years to build, and costing of the order of £10,600 million. This appears to be somewhat less than twice the current estimate for the single reactor station at Flamanville.

The SPLG consider the practical details of construction and cost are not sufficiently developed to enable full consultation to take place on the impacts on the local communities and their mitigation to take place.

- 2.6 The timetable for consultation and construction is not described, even in outline, in the Stage 1 documentation, and so has to be inferred from the similar, but more advanced, exercise for Hinkley C in Somerset. This suggests that the overall construction period could last about 10 years, with significant construction activity lasting seven years. EDFE has informally suggested that the current working assumption is that the peak year for construction activity could be 2021, with some 5,600 workers on site.

- 2.7 The EDFE proposals for Sizewell C will be considered by The Planning Inspectorate as a Nationally Significant Infrastructure Project (NSIP) and they have already pre-registered the project. Following the formal submission by the developer of a Development Consent Order Application, the Planning Inspectorate process takes about one year – considerably shortening the previous process for considering controversial proposals.

- 2.8 There is considerable concern about the wider implications of local communities accepting the disturbance and implications of nationally significant infrastructure projects, particularly those involving nuclear power. This has resulted in an approach to securing wider community benefits in areas affected by new nuclear projects, drawn up by the New Nuclear Authorities Group (NNLAG). This starts to establish an agreed framework for the negotiation of payments from the developer to the local communities involved.

The SPLG are anxious to engage fully with EDFE, but consider that the Stage 1 consultation material to be vague and premature, and lacking in specific proposals to compensate the affected local communities. It is suggested that a further Stage 1 Consultation should take place, when EDFE have provided the necessary missing detailed information.

- 2.9 The government energy policy was outlined in the November 2012 Energy Bill. It is currently understood that the fundamental issues of the Contract for Difference

mechanism and the setting of an agreed 'strike price' guarantee from the Government to power station developers are planned to be set out in April 2013. This will be fundamental in the financial structuring of the project, the likelihood of achieving private sector funding, and its profitability for EDFE. There is still considerable uncertainty regarding the timing of investment decisions – if these take place before or after the 31/12/2015 transition to the 'enduring regime'. There is also the need to progress the allocation of the costs of the Funded Decommissioning Programme before the developer will have sufficient confidence to proceed with the project.

Until the financial fundamentals of construction costing, energy pricing and the funding of de-commissioning are clarified, the SPLG consider it is not possible for EDFE to engage with the local communities about the scope and financial scale of mitigation and community benefit proposals.

3. The Stage 1 Consultation documentation and process

- 3.1 In general the Stage 1 documentation is considered to provide broadly appropriate, if brief, information on EDFE's proposals at this pre-application stage. The bland outline of the consultation process put forward in the Statement of Community Consultation (SOCC) appears to have been followed. There is, however, very little quantified detail on the expected impacts, particularly on transport matters. No information has been presented on the transport modelling, required to quantify estimates of the traffic impact of construction phase commuters, and the traffic model itself is still under development (Transport Strategy para 4.1.4). Thus the SOCC claim that the 'Transport Strategy' will have 'supporting information' is considered not to be met.

The view of the SPLG is that the Stage 1 Consultation will need to be followed by at least two cycles of detailed consultation on the traffic impact mitigation proposals, before the Stage 2 Consultation and the DCO application, for these not to be legally challenged. The SPLG is anxious to exploit further opportunities to raise new matters when EDFE provide a more detailed evidence base.

- 3.3 The timescale is unrealistically short for such a consultation – the Stage 1 information was published on 21 November 2012, and responses are required by 6 February 2013, some eleven weeks later. This period included the Christmas and New Year holidays, and does not allow for the extended and un-synchronised cycles of local government committee meetings.

The SPLG consider the effective timescale provided to be far less than the nominal elapsed 11 weeks, resulting in a need for further cycles in the consultation process.

- 3.2 The SPLG has been active since 2009, and has maintained close contact with the EDFE developer and the SCC and SCDC statutory consultees before and during this consultation. The Community Forum, set up by EDFE with an independent chairman, includes the chairmen of all the local Councils around Sizewell and the

Chairman of SPLG. It is usual to offer some assistance to statutory consultees in a NSIP development process, and EDFE is funding the involvement of SCC and SCDC – statutory consultees. Support to the local Parish and Town Councils, as ‘interested parties’ was organised late in the Stage 1 timetable – too late to be of material help to SPLG. The SPLG is anxious to continue its constructive engagement with EDFE and the statutory consultees, and consider that further funding for technical assistance should be made available following the Stage 1 Consultation.

- 3.4 This document has been structured to respond as far as possible to the structure put forward in the EDFE Consultation Questionnaire.

4. Overall views on the EDFE’s proposals

- 4.1 It is accepted that the site selection for the power station to the north of the EDFE landholding is the only option. There is, however, considerable concern over the safety and environmental issues, and a lack of information on the coastal processes, and the impact of the power station on the adjacent Minsmere and off shore water regimes. Considerable further work is considered to be required to demonstrate to the long term robustness of the nuclear peninsula design for the next 160 years. The environmental impact of the jetty, dredged access channels, thermal plumes, and modified shoreline profiles, and their mitigation remain unclear.
- 4.2 It is paramount that the design of the new buildings for Sizewell C is both safe, environmentally acceptable, and achieves the highest standard of aesthetics, sympathetic and responding to the local setting, in this Area of Outstanding Natural Beauty. The current design appears not to provide an iconic enhancement to the Suffolk coastline, and fails to respond to the adjacent Sizewell B, and, as shown by EDFE, is simply an irregular jumble of block type buildings, squashed together in a haphazard manner.
- 4.3 The Stage 1 consultation material gives only a vague indirect suggestion as to the power generation expectations, and no information is provided on construction cost assumptions, or expectations about the price to be charged for the power produced. Thus no views can be offered on the possible viability of EDFE’s proposals.

<p>Based on wider sources, the SPLG consider the balance of development costs environmental impacts and benefits, and their distribution between the parties involved, to be insufficiently developed for significant community engagement to take place at this stage. It is noted in the press that decommissioning costs at Sellafield are now approaching £70bn. and still rising.</p>
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5. General views on the proposed temporary use of land

- 5.1 The EDFE proposals suggest a temporary construction compound of some 140 hectares of beautiful and peaceful landscape in an AONB, including good agricultural land and parts of a Site of Special Scientific Interest (SSSI). This is more than four times the size of the eventual power station footprint of some 32 hectares. (For

comparison, the construction of Sizewell B only used a temporary construction site of some 30 hectares). Little evidence is presented as to why EDFE needs this large construction compound, or what is the logic of its arrangement. It is considered that this proposal represents an easy soft option with little thought evident as to how the local construction period land take could be minimised, and restricted as far as possible to EDFE's existing land holdings.

- 5.3 The construction timescale is suggested to extend over some seven to nine years. While this timescale appears consistent with assumptions regarding Hinkley C (and with the progress of EPR power stations elsewhere) no options for shorter or longer periods, nor any trade-offs with land take requirements, are discussed.
- 5.4 The proposals for the proposed temporary use of land for the worker accommodation facilities also appear to be excessive. The proposed campus accommodation – for 2,000 to 3,000 workers housed at a single location – appears excessive and simplistic. As discussed in Chapter 7, there are considered to be several other ways in which workers could be accommodated, which would not require such a large campus on sensitive land adjacent to the small village of Eastbridge.

The proposed land for the temporary construction compound appears excessive and unjustified. It would be helpful for EDFE to identify clearly the extent of their current land holdings in the area, and where such land does not form part of the Sizewell C proposal, to set out clear reasons for the exclusion of that land. The SPLG consider that a serious and detailed appraisal needs to be carried out and made available, focussing on the land already owned by EDFE around their Sizewell site, to see how it could be used to reduce drastically the proposed use of land elsewhere in the AONB and the SSSI, including some good agricultural land that would be compulsory purchased, and if not, why not.

6. Views on the proposed visitor centre options

- 6.1 The proposed visitor centre options are considered to be a matter for local consideration, and for EDFE's public relations. The views (both politically and literally) of the Sizewell residents and business interests need to be taken into account, to ensure the short and long term viability of the immediate local community, and the continued enjoyment of the beach.

7. Views on the overall accommodation strategy

- 7.1 The proposed overall accommodation strategy relies heavily on a large temporary accommodation campus for some 2,000 to 3,000 workers on a single site adjacent to the construction site on the edge of Theberton and Eastbridge, the population of which is not more than 400. This is considered to be an insufficiently thought through solution, designed to minimise commuter impacts, The social and environmental impact on these villages would be devastating, and cover a period of up to 10 years

- 7.2 The use of a single, large campus of temporary four story accommodation is not considered to be socially desirable, or a sensible use of resources, nor is it, in any way, a sustainable solution. (For comparison, the proposals for the construction of Hinkley C comprise three separate temporary accommodation locations totalling about 1,900 spaces. At the Stratford Olympic Park, some 10,000 athletes were accommodated in tower blocks planned to be converted to legacy use as some 3,000 flats).
- 7.3 There should be a much more sympathetic and considerate approach to the provision of temporary accommodation, and its permanent legacy use. While a large proportion should be as close to the construction site as possible, it should be dispersed to reduce the impact on the locality, and allow some social and cultural differentiation between campuses. Some of the accommodation should be designated for on going EDFE use for workers during outages. Some smaller groups of housing could be built as permanent accommodation for future use on completion of the contract, for example as elderly people's or student accommodation

This issue merits significant detailed consideration and we further suggest that as a general approach EDFE should examine options for small permanent housing schemes at appropriate locations within the area to provide housing for key workers associated with the operation and maintenance of Sizewell C, together with assisting and meeting local affordable housing needs where households in need are unable to access the local housing market because of the socio-economic impacts of the Sizewell C proposal on the local housing market.

The SPLG consider the approach to the scale of the proposed temporary accommodation campus to be, unsupported, and simplistic, resulting in an unsympathetic over-provision on a single site. A much more detailed and nuanced study is considered essential, to include a greater emphasis on the development of sustainable permanent dispersed affordable housing and smaller temporary sites.

- 7.4 The lack of detail and differentiation extends to the treatment of accommodation elsewhere. The accommodation strategy appears to rely heavily on the use of holiday homes in east Suffolk. Only preliminary consideration appears to have been given to the commuter travel plans, and the use of rail and longer distance bus public transport to bring workers to the site. More detailed consideration is expected to reveal opportunities for dispersing temporary workers to permanent accommodation well located for sustainable public transport corridors and access nodes. A further opportunity is understood to be to provide temporary rail passenger services from Saxmundham using the rail access to the site, allowing easy rail commuter opportunities from all points on the Ipswich to Lowestoft line. These would reduce the requirements for both temporary near-site accommodation, and for Park and Ride facilities.
- 7.5 EDFE has made no proposals to encourage the development of new dispersed housing. This is seen as a wasted opportunity to engage with housing associations

and other providers of affordable housing to provide a housing legacy of general benefit to the community.

The SPLG deplore the lack of creative consideration of the dispersed provision of accommodation capable of being adapted for useful legacy use for affordable or community style accommodation.

8. Views on the proposed accommodation campus options

8.1 EDFE's Option 1: their proposal to accommodate 3000 construction workers in 4 storey temporary accommodation right on the edge of the villages of Eastbridge and Theberton (population approximately 400) is totally unacceptable. The social impact, together with the noise, air, and light pollution would be devastating. Out of the 3 proposals, this one puts the workers the furthest distance from the site, and it is unrealistic to think they would walk to site because of the distance. This option would also have the biggest and gravest impact on the environment and the AONB.

8.2 Both EDFE's Option 2 and 3 suffer from unacceptable drawbacks as presented. Option 2, places the accommodation closer to their site and adjoins the development site for the Greater Gabbard and Galloper Wind Farms, and would enable workers to walk into Leiston for shopping and social opportunities. It would also lend itself to providing some legacy housing. It would, however, be unacceptably close to the existing community of Leiston.

8.3 EDFE's Option 3 is similarly unacceptable for the Leiston community, although there could be some incidental benefits from the leisure facilities to benefit Alde Valley School.

The SPLG consider that a much more sympathetic and nuanced study of a dispersed pattern of temporary accommodation is required, taking account of the longer term needs of the local community, and for accommodation during periodic maintenance events.

9. General views on the overall transport strategy

9.1 The Transport Strategy and Supporting Information document is considered to lack the latter. Appendix C to this response provides detailed comments. It is clear that the EDFE commissioned analysis has not advanced to the extent needed to provide any firm input to the assessment of transport Options, or to the justification of the level of traffic impact mitigation measures proposed. Little attention appears to have been given to the development of a sustainable workplace travel plan, maximising the use of walk/cycle routes, and the development of direct, end to end bus routes.

9.2 No consideration appears to have been taken of the impacts on the rail system, in particular the operation of level crossings, and the condition and weight limits on road overbridges. The possibility of providing a rail shuttle service from Saxmundham rail station into the site needs to be explored.

- 9.3 There does, however, be a significant bias towards adopting assumptions which minimise the impacts, and then underestimating the measures (both infrastructure and management) to mitigate them. This is returned to in Chapters 14 and 15

The SPLG consider the EDFE Transport Strategy completely lacking in evidence on the assumptions made and the analyses undertaken, and hence does not fully meet the needs of the Stage 1 Consultation. The Transport Strategy itself is considered to lack detail, and to underestimate the development impacts, and hence the need for proposals for their mitigation.

10. Views on the northern park and ride options

- 10.1 The SPLG support the principle of the provision of a northern Park and Ride site as part of a sustainable workplace transport plan, although its detailed location is more a matter for the local Parishes. The SPLG consider Options 2 and 3 for the northern Park and Ride to be feasible, with advantages and disadvantages. Possibly a combination of smaller sites could be considered. The more northerly, Option 3 A12/A144 site is marginally preferred – it intercepts the main A12 traffic earlier, and lies to the east side of the A12, so that the predominant traffic approaching from the north can turn left into the site. It also avoids any increased car activity at the level crossing approaches. The A144/A12 junction is, however, an accident blackspot, and will require redesign to accommodate increased activity. Bus transport from Option 3 can still call by Darsham railway station, and perhaps a small version of Option 2. There is potential legacy use of the Darsham site for a larger permanent station car park, and perhaps more small business units.
- 5.2 Option 1 on the B1122 Yoxford Road is considered totally unsuitable and is strongly opposed – it would add to the car traffic on the B1122, and involve extra use of the level crossing..

11. Views on the southern park and ride options

- 11.1 As noted in Chapter 7, the SPLG consider that there is considerable scope for use of the rail system and for direct bus services from the greater Ipswich area, reducing the need for large Park and Ride sites, particularly for commuting from the south.
- 11.2 As with the northern P&R, local views on location should be respected, but the SPLG in general prefer the more southerly Option 2 Woodbridge site: it intercepts the cars earlier, before the single carriageway section of the A12, and has direct access to the roundabout.

12. Views on the management of HGV movements

- 12.1 The broad aspiration to deliver freight to the site by the most environmentally advantages means is applauded. The use of a freight management facility (FMF) and the enforcement of approved routes is likewise laudable. Without some details of the assumptions and analyses, however, only limited qualitative comments can be

offered. It is unclear why, with a sophisticated 'just in time' freight supply chain and a FMF there is a need for such a vast temporary construction area adjacent to the site. There is also a lack of quantified detail as to the materials handling strategy to maximise the use of rail and sea transport.

- 12.2 The preliminary broad and unsupported road freight traffic estimates suggest 200 to 600 freight vehicle movements per weekday – size of vehicle unspecified. Even if this contains some medium goods vehicle movements, it implies of the order of doubling of the heavy goods vehicles passing the Farnham Bend, and a far greater impact on the B1122 from Yoxford, through Middleton Moor and Theberton. These implications are explored further in Chapters 14 and 15.

The SPLG consider the wide and unsupported assumptions regarding the HGV traffic impacts to be inadequate, given the sensitivity of the subject, and the implications for major infrastructure requirements.

13. Views on the proposed lorry park options

- 13.1 The use of a FMF is applauded, since it provides an opportunity for off-site short term staging of freight storage, and the opportunity to manage the timing of heavy goods traffic on the A12. Importantly, it will contribute to the minimisation of the area required for storage at the temporary construction area. The choice of location is largely a matter for local interests.
- 13.2 The SPLG has a marginal preference for Options 1 or 2 adjacent to the existing Orwell Crossing Lorry Park on the A14. This will keep HGV movements on the main A14 / A12 dual carriageway route from the south. Option 3 at the Seven Hills roundabout is not favoured – it will add traffic to the congested A12/A14 Seven Hills junction and the A1156.

14. Views on the proposed junction and road improvements

- 14.1 Given the vague, qualitative and preliminary nature of the traffic analysis, and the lack of detail shared, it is difficult to make firm comments on the proposed junction and road improvements. The A12 is a vital and busy link for the communities of Suffolk Coastal and Waveney Districts, and it is clear that significant if un-quantified impacts would be caused by Sizewell C construction activity over a period of at least seven years. These impacts will include increases in congestion, noise, air pollution, and accident potential on the A12 itself, and greatly increased queuing and inconvenience for local traffic crossing the route.

The SPLG consider the likely impact of the Sizewell C construction traffic significantly increases the already strong case for the full Four Villages Bypass.

- 5.3 The EDFE Traffic Strategy fails to make any proposals for improving the environmentally sensitive and structurally weak B1122 route from Yoxford to the Sizewell C construction site. The SPLG consider this to be totally unrealistic –

significant mitigation measures are considered essential. The actual nature of these measures – improvements to the B1122, or another existing route, or the provision of a new route – are all strongly opposed and sensitive suggestions. The local built environment within Yoxford needs to be considered when suggesting any junction expansion proposals.

The County Council are looking again at the new road route direct from the A12 into the Sizewell site, as proposed at the time of the construction of Sizewell B. The new alignments put forward in 1987, and other possibilities, require detailed study to assess their relative unattractiveness. It is, however, clear that the existing B1122 is not fit for purpose to take the heavy construction traffic, cars and park and ride coaches. If a new link road from Sizewell to the A12 was considered by the Planning Inspector for Sizewell B, then it is certainly needed to serve the decommissioning of A, Sizewell B and a new twin reactor power station at C.

A new road from the A12 directly into the site would satisfy many requirements, including construction traffic access, emergency vehicle use and a much better access for local people between Leiston and the A12, and local traffic between Saxmundham and Leiston, but would require detailed and sensitive study to establish a least worst alignment.

15. Detailed views on local traffic impacts and mitigation

- 15.1 The Transport Strategy makes no suggestion regarding local traffic impacts, postponing consideration until after Stage 1. There is also only sketchy suggestions of the scope for sustainable workplace travel planning, including cycling, significant strengthening of the existing bus services, and a dispersed network of commuter buses. The SPLG, while it is in dialogue with EDFE on their Stage 1 Consultation, have not been approached for their views on the likely nature of transport impacts, and the consequent need for mitigation measures. The SPLG has taken the initiative to approach each Parish and Town Council to gather details of current and anticipated problems (in the absence of any validated evidence from EDFE) and to collate possible solutions. While this initiative was started before the publication of the Stage 1 documentation, it is unlikely that the results will be fully collated before the close of the consultation, given the unrealistic Christmas timing of the process.
- 5.4 Early results, however, suggest that the evidence for the need for widespread local junction and road traffic mitigation measures is incontrovertible. The lack of significant transport infrastructure investment proposals in the EDFE Transport Strategy is considered unrealistic.
- 5.5 As a starting point for discussion and analysis with the transport model when available, the following broad permanent transport infrastructure requirements are suggested. These are clearly preliminary, since EDFE has not provided any information, or any significant technical assistance to SPLG during Stage 1.

Suggestion	Notional cost (£M 2013 prices)	Legacy community value
Infrastructure and support for sustainable transport initiatives, such as walk/cycle infrastructure, bus halts, Intelligent Transport Systems, sponsored bus services	£20 M	Considerable
A12 Full four villages bypass, single carriageway	£60 M	Considerable
A12 – Sizewell Link Road	£60 M	Of long term benefit to the Power station site
Junction and safety improvements on the A12	£5 M	Considerable
Calming along the B1125	£5 M	Considerable
Claming and management of other roads (B1119, B1069,A1094 and others)	£10 M	Considerable
Subtotal with community benefit	£140 M	
PLUS temporary Park and Ride and FMF required during construction		

The SPLG are convinced that there is considerable need for traffic impact mitigation, and value in engagement with local knowledge and experience, and urge EDFE to develop a closer relationship with local interests.

16. Views on the proposed rail freight arrangements

- 16.1 There is little detail yet available on the overall materials handling requirements for the Sizewell C construction, particularly the maximisation of sea transport. The EDFE proposals to maximise the use of rail freight, and to manage the freight laydown area close to the construction site are applauded by the SPLG. It is unclear to what extent the plans for increased rail use – quantity and weight – have been checked out with Network Rail. The detailed way in which the proposed Wickham Market passing loop will maintain and improve the robustness and reliability of the main rail route during and after the Sizewell C construction period remains to be demonstrated. The alternative of full dualling of the rail route between Wickham Market and Saxmundham should be considered.
- 16.3 The Options for the extension of the rail link into the Sizewell construction area are a matter for local interests. Due consideration is, however, required to ensure that transshipment and the excessive land take for temporary laydown areas are minimised, with a rail route accessing the central part of the construction site.

17. Views on the education training and local supply chain proposals

17.1 The SPLG welcomes the outline proposals to encourage local people to seek employment and training during the building of Sizewell C and when the station becomes operational. The need for a highly trained workforce in East Suffolk is vital, not only for the local economy but for the long term wellbeing of individuals, their families and social mobility.

17.2 The plan to provide opportunities for local businesses to supply their services to EDF during the building period is to be commended. Business managers could benefit from an opportunity for growth in their company, to develop or diversify during and beyond the building period. Thus there is the possibility to encourage a strong employment base for the future, together with the necessary skilled workforce

17.3 The outline in Stage 1 Consultation “People and the Economy”, which SPLG applauds, requires detailed examination, questions and possibilities for the industry and local community, but will require considerable further detailed development and discussion with stakeholders prior to the Stage 2 consideration of the Preferred Option. . The following points are raised for discussion:

- **A holistic approach to education & training.** Although there will be an emphasis on engineering and science for the energy industry, in any curriculum there should be consideration given to the social and emotional develop of the individual, particularly young people. Employment and productivity in a company is not only knowledge based but requires sensitive relationships in teams, together with individuals who are psychologically and physically healthy.
- **Young people.** As a basis for making provision, research should be undertaken to identify a profile of the education and training needs; current unemployment figures and demography (where are young people living in the region).
- **Retirees.** Consideration should be given for the involvement of local highly skilled retirees as tutors and mentors in education and training.
- **Sustainable business growth.** A training support system should be considered for the long term management, products and financial development of local business.
- **Labour force.** The construction and maintenance of a huge power station and the resurgence of associated businesses may draw families from elsewhere in the UK to seek employment in the local community. The local authorities and EDFE need to be aware that such an expanded local workforce may place added pressure upon schools, housing, health and social services.
- **Public transport.** How will students travel to colleges and other training centres? Leiston bus services are poor and trains not available, except at Saxmundham where they are infrequent. Outlying Suffolk villages are also noted for poor or non-existent public transport services. If young people are expected to travel to

colleges in Ipswich, Lowestoft or Bury, then this transport issue will need to be addressed and/or a training campus provided in Leiston.

- **Training Apprentices.** There is a case for the over production of apprentices at EDF as a service to future generations of young people and the industry in particular. Essentially, the supply of apprentices' for the energy industry and allied employment, should encourage not only employment at Sizewell but long term (over the next 100 years) diversification and employment mobility in the UK, EU and abroad. The cost of training apprentices could be shared between all energy providers in the region. Lastly, to increase the number of apprentices, local businesses under contract to EDF, should employ an apprentice as part of their commitment to training young people for a future career.
- **School curriculum.** Consideration should be given to the detailed financing and technical support for the curriculum, equipment and teachers, required for schools with an emphasis upon engineering and science.
- **Progressive study for career development.** There should be opportunities and flexibility to enable young people to progress from school to an FE apprentice to a BSc or MA degrees.
- **EDF Bursary fund for young people.** A bursary fund should be introduced to support individual apprentices and school and college students who encounter financial hardship issues, which preclude or disrupt their studies. This could also include a sponsorship programme, linked to subsequent employment.
- **EDF Graduate Employment Scheme.** Consideration should be given, within the Graduate Employment Scheme, to local young people returning to Suffolk from their university degree studies, studies which may have a broad application to employment in a large scale industry.

18. Views on the consultation process

18.1 The SPLG commends EDFE on its wide engagement with the local stakeholders, and the reach of its public consultation exercise. The timescale is considered to be unrealistically short, and the level of detail of most of the subject areas to be woefully short and lacking in a firm evidence base for meaningful discussion.

The SPLG consider that the consultation process is flawed in both the shortness of timing and lack of evidence, and does not enable interested parties to engage in the manner envisaged by the Planning Inspectorate for the pre-application process. A further cycle of consultation is considered to be required, enabling consultees to raise new concerns of principle and detail, prior to the presentation of the Preferred Option package at Stage 2.

18.2 Given the lack of quantitative evidence, or even assumptions and analysis, consultees have to fall back on local knowledge and informed local opinion. While the provision of assistance from independent planning consultants would be welcomed, it was offered too late in the (in any case very short) consultation period. Further, given the lack of firm technical evidence in the Stage 1 documentation, any general external planning advice to assist in formulating local stakeholder responses would have been of marginal value.

18.3 The Consultation documents do not develop the concept of Community Benefit Contributions (CBC) in any detail. Community Benefit is the payment in money or kind to a local community in recognition for hosting a development that, whilst delivering national benefits, imposes environmental, financial, or other burdens upon the locality. CBC, by their nature are non-specific, in addition to all the direct costs of impact mitigation, and will involve a wide and flexible range of local channels for their effective disbursement, in addition to the local authorities involved. The government is committed to engaging with developers and local authorities to bring greater certainty to all parties in this process. The SPLG consider that there needs to be considerable progress in developing the detail and scale of CBCs before Stage 2, and urge EDFE to commence suitable broad-based engagement. As a starting point, the SPLG suggest the following funds, in addition to any CBC funds mediated through the police, emergency services, or District or County Councils, and in addition to the cost of temporary works and more direct mitigation measures discussed elsewhere.

Suggestion	Notional cost (£M 2013 prices)	Beneficiaries
Local Community fund for initial disbursement through a special purpose trust committee, for infrastructure and other one-off initiatives	£30 M	Wide ranging
Rolling fund for Housing Association development of affordable housing	£30 M	Considerable
Sub-total initial CBC	£60 M	
On-going local community initiative support fund	£2 M per annum	Wide ranging

19. The SPLG conclusions and recommendations

6.1 Funding should be made available by EDFE for necessary infrastructure works, including a new link road from the A12 directly into Sizewell, the 4 Villages by-pass, and other transport measures to be agreed when more information is provided. It should also include funding for mitigating community benefits. This should form part of their planning application, and be made available if and when planning permission is granted by the Secretary of State. We estimate this fund to be in the region of £200M.

6.2 The SPLG welcome the Stage 1 documentation and consultation processes as a useful start to engaging with local interests, but they are considered at times to fall

short of legal requirements, in terms of the level of detail, the quantified evidence, and the statements in the SOCC. The timescale for response over Christmas and New Year has meant that some formal feedback has not been possible by the deadline. A further round of more considered and evidenced consultation (particularly as regards transport and traffic matters) with a wider and more nuanced range of Options, is considered necessary before the process moves to the Preferred Options at Stage 2.

Overall, the SPLG consider more work is required to demonstrate the adaptation of the EPR station design (in terms of coastal processes, design of the containment vessels, and setting within the AONB) to provide a suitably safe and iconic long term addition to the Suffolk coastal skyline.

The temporary use of land for materials storage, construction activities and worker accommodation all appear excessive and unjustified.

All the Options suggested for the temporary accommodation campus are considered socially and environmentally unsuitable. Further work is needed to develop a more sustainable long term accommodation strategy, in partnership with local housing providers.

The Transport Strategy lacks evidence and detail, and is considered inadequate in its assessment of the scale and location of traffic impacts. More work is required to set out a detailed sustainable workplace travel plan, before informed comment can be made on the Park and Ride and on-site parking. More work is required to set out the overall freight mode split (sea/rail/road) before informed comment can be made on the FMF and rail freight proposals.

The detailed SPLG evidence base on anticipated local transport problems anticipated from the development proposals is still being assembled, but should be available for testing by the time the Traffic Model is ready. Early evidence suggests, however, that some £140M will be required to mitigate the construction traffic impacts, in addition to the P&R, FMF and construction site traffic arrangements. This estimated sum includes proper infrastructure and operational support for a comprehensive sustainable workplace travel plan, as well as a full bypass to the A12 four villages, and a solution to provide a new access route from the A12 to the construction site.

The Stage 1 documentation has not developed proposals for the Community Benefit Contributions to compensate the local communities for their hosting of new nuclear construction. Experience suggests that this must be addressed urgently, and in quantified detail, for the plans to receive even grudging acquiescence from local interests.

Appendix A Detailed comments on the EDFE Transport Strategy supporting document

Reference	Comment
General	The document is not an evidence-based 'Strategy' – just an initial narrative of intent, based on some unsupported initial assertions about the scale of activity.
Timetable	Several references are made to evidence and more detailed phases of consultation, with no proposals about the timescale and phasing of these in the period to the submission of the Draft Development Consent Order Application (Draft DCO Application).
Programme of construction	It is difficult to comment on the assertions made without some indication of the construction programme start and duration.
Para 1.2.2 aims of the 'Transport Strategy' document	In our view, the document fails to set out (as claimed) the 'transport work EDF Energy has conducted to date' and so does not allow consultees to comment in any quantified way on the assertions made.
Para 1.2.4 assertion that the process is robust and evidence-based	In our view, the document fails to 'demonstrate that EDF is following a robust and evidence based process' – no evidence is presented
Para 1.2.5 stages of consultation	Given the lack of information in these Stage 1 documents, it is important to outline the proposed further cycles of information release and consultation prior to the publication of the preferred options at Stage 2, and the submission of the Draft DCO Application. In our view, the information available at this stage falls well short of what is required by the process. It cannot be considered adequate, and the Stage 1 complete, until a proper detailed evidence base is available, audited, and discussed.
Para 2.3.4 Transport Assessment (TA) requirement	No evidence, or statement of a process leading to the presentation of evidence, of a TA to a standard compliant with the Department of Transport Transport Analysis Guidance (WebTAG) is presented in the document.
Para 2.3.6 Travel plan requirements	As above
Para 2.3.11 costed New Approach to Appraisal	As above
Para 2.3.13 Scope of Draft DCO Application	It would be sensible to engage with consultees in the run up to the Draft DCO Application.
Para 2.5.6 A12 Four	The strong SCC and local Council historic support for the

Villages Bypass	A12 Four Villages Bypass, and their aspiration for this to be funded as part of the Sizewell C impact mitigation is noted and endorsed. In our view, however, there are also many other locally severe impacts which will require mitigation.
Para 4.1.5 Traffic Model development oversight	We welcome the commitment to work closely with SCC on the agreement of the traffic models. Only after such agreement has been reached will interested parties be able to comment in detail on the development traffic impact mitigation proposals.
Para 4.2.1 and 4.6.5 Modelling software	While VISUM is agreed to be suitable in principle for the traffic modelling (subject to the methods for matrix estimation) it will be important to use suitable junction modelling where congestion is likely to occur.
Para 4.3.1 Model geographic extent	While the extent appears plausible, this can only be confirmed when estimated incremental impacts are made available. There is an inconsistency between the text ('model links shown in red') and the more plausible Figure 4.1 key (all coloured roads?)
Para 4.4.1 Traffic counts	The extensive neutral month traffic count programme is noted, but it is unclear which have been used for network calibration; matrix estimation; and model validation.
Para 4.4.3 Initial traffic assessment	Given the lack of model calibration and validation evidence (and indeed any model results) the initial traffic assessments cannot be commented on.
Para 4.5.2 choice of peak period	Friday afternoon appears plausible as a peak period, but no evidence is presented, nor is the reference and peak construction scenarios time horizon identified.
Para 4.5.4 other time periods	In our view, the summer weekend conditions will require explicit examination, given the existing extensive congestion at these times.
Para 4.6.1 Further model work	We cannot comment on this, since we have no information on the level of confidence of the preliminary (aka 'interim') modelling.
Para 4.6.5 Use of junction modelling	It is unclear where it would be appropriate to use the junction modelling software, particularly LinSig.
Para 5.2.1 Peak construction workforce	While the workforce numbers profile is presented (for example the Consultation Document Fig 4.1) no information are assumptions are given as to the dates and durations.
Para 5.3.3 Journey to work distribution model	No information is presented on the calibration or validation of the distribution model. No reference is made to Census JTW sources. In our view, there will be considerable scope, through travel planning exercises, accommodation strategy, and recruitment policies, to influence the commuting pattern.
Para 5.3.11	The statements made in this paragraph regarding

Distribution model conclusions	commuting patterns are important, but vague and unsupported by evidence.
Section 5.4 Commuting patterns	The simple arithmetic logic for the split of commuter numbers by mode and method of commuting are accepted in total, but require much more work before they can be commented on in meaningful detail.
Para 5.4.8 Site car park	More detail is required on the proposed car park permit system, and the expected daily occupancy turnover to allow comment.
Para 5.4.14 Park and Ride	The size of the P&R sites is a function of the distribution model and travel planning assumptions, and so cannot be commented on in detail. It is, however, accepted that the current assumptions are a reasonable starting point. While local site arrangement options are commented on elsewhere, no definitive traffic comments can be given until the results of an agreed validated traffic model (and possibly access junction modelling) are available.
Para 5.4.17 and 5.4.19 Direct bus and rail services	It is agreed that considerably more commuters could be attracted to direct bus services, through appropriate routeing, siting of 'kiss and ride' stops, and links to the recruitment strategy.
Para 5.5.8 Shift patterns	The Hinkley C assumption is a helpful start, but needs to be refined, particularly as regards the planned occupancy turnover at the car park
Para 5.5.10 Saturday shifts	It will be important to minimise the amount of longer distance Saturday commuting, particularly during the summer periods.
Para 5.7.1 Further transport strategy work	It is noted that 'there are a range of areas where further work will be undertaken'. Until such work has been undertaken, and discussed and agreed with SCC as the relevant transport authority, 'interested parties' such as SPLG will not be able to participate meaningfully in the consultation process. This will constitute a fundamental flaw in the consultation process. A defined and practical timetable of informed consultation and negotiation is required.
Para 6.5.2 Spoil disposal	In our view there is clear need for considerable further work on this. It is possible that there are many local coastal protection and wetland opportunities for the disposal of some fractions of the excavated material, in addition to the Wallasea Island reserve.
Para 6.7.20 Rail freight access	We support the continuation of the rail freight access into the site, to minimise double handling, maximise freight by rail, and achieve a consistent rail network freight capacity of 4-5 trains per day. The choice of route is a matter for local consideration
Para 6.7.25 Wickham	This is clearly an essential component to achieve the

Market rail passing loop	consistent rail freight network capacity, but is considered to be of only minor legacy value.
Para 6.8.6 HGV assumptions	It is unclear how the modelled HGVs have been defined and estimated, and why this is a 'conservative and robust definition'.
Para 6.9.5 Freight management Facility	At southern P&R or near the A14. favour a separate FMF.
Chapter 7 Traffic impacts	Until some quantified evidence is presented, no firm views can be given.
Para 7.3.4 traffic impact	This is meaningless without a programme and time horizon
Para 7.4.3 Farnham Bend	It is accepted that some significant improvement will be required to cope with the expected (but as yet unquantified) increase in the number of longer HGVs.
Para 7.5.2 B1122 at Yoxford	Any junction improvements at the A12 will need to take into account the interaction with the adjacent junction with the A1120.
Para 7.5.3 B1122 impact	This will indeed need to be considered carefully when some audited quantified evidence is available.
Para 7.6.2 Other traffic impacts	No evidence has been presented to support the assertion that 'the operation of most parts of the local road network will not be materially affected'. SPLG members have anticipated concerns about many routes and locations. These include the B1125, the A1120, the A144, the B1119, the A1094 and the B1069. Effective traffic calming and alternative modes and routes are needed to stop construction related traffic of any kind through Knodishall, Leiston, Saxmundham, Theberton, Eastbridge, Middleton, Westleton and Blythburgh.
Section 8.1 Pre-application phase	While the role of SCC is acknowledged, no opportunity appears to be offered to interested parties to comment on the EDFE proposals in the light of a quantified and audited evidence base. A firm and realistic programme is required to allow constructive involvement and maximise agreed matters prior to the submission of the Draft DCO Application.
Para 8.2.1 transport issues for the DCO Application	No mention is made of an Local Model Validation Report (LMVR) or a commitment to undertake a full New Approach to Appraisal (NATA) Assessment Summary Table (AST) to DfT Transport Analysis Guidance (WebTAG) standards.