



SIZEWELL PARISHES LIAISON GROUP

EDF STAGE 3 PRE-APPLICATION CONSULTATION RESPONSE

29th March 2019

Introduction

This document has been prepared by the Sizewell Parishes Liaison Group (SPLG) in response to the Stage 3 Consultation documents published by EDF Energy (EDFE) in January 2019, following our response to their Stage 2 Consultation two years ago. This Submission represents the matters of general agreement between the members of the SPLG, and is separate from the individual submissions of the local councils and other interests.

The SPLG is a group of councillors representing a majority of the Parish Councils which will be affected by the Sizewell nuclear power station site. Our aim is to employ our knowledge to encourage EDFE and other locally based energy industries to share financial responsibility for infrastructure and social provision needs in the local communities that we serve and guidance as to how mitigation should best be provided. The Group was set up in January 2009, and has followed developments at Sizewell and elsewhere since then. Further details can be found on the SPLG website: www.sizewellparishes.org.uk/

SPLG Main Concerns

Each Parish Council has identified, in detail, the important concerns of its population in their submission to EDF. SPLG is impressed by the quality of Parish Councils' Submissions to EDF and this Paper is in support of their sterling efforts. For the benefit of this SPLG Submission we have identified issues, needs, questions and solutions where we come together in agreement as a whole body or between several Parish Councils.

1 Sizewell C Proposals: Overall view

The response by Parish Councils, who contributed to this SPLG Submission, is unanimous disappointment with the EDF Stage Three Submission:

- *That after more than 6 years since the first consultation, where information was either not forthcoming or not known, we are still no nearer to answers on so many vital issues.*
- *The EDF proposed solutions about roads, workers' accommodation, environment and a lack of clear financial commitment or details about mitigation and legacy.*
- *The Parish Councils think it is imperative to continue in dialogue with EDF after 29th March 2019, to address the many issues which remain unresolved.*

The huge impact of construction traffic, the noise, light and air pollution and the influx of up to 5600 workers, will bring enormous pressure on local residents, visitors, roads, accommodation and services such as health facilities and policing. The site is in an Area of Outstanding Natural Beauty, next to Minsmere Nature Reserve, the flagship of the RSPB, and of huge importance for tourism. The construction, lasting 10 to 12 years, or maybe longer, will have a devastating effect on this Suffolk Heritage Coast for many years.

However, we recognise there may be opportunities of local employment, and benefits for local businesses. We also note EDFE's intimation to offer financial support for community facilities, tourism and infrastructure improvements, to help towards solving or mitigating the impact of this huge construction project in such a special and beautiful part of Suffolk.

2 Environment

The Parishes of Blythburgh, Walberswick, Middleton, Westleton and Theberton/Eastbridge in particular are concerned about the impact of Sizewell C on the coast, heaths, marshes and reserves. These Parishes, which lie in this area of outstanding beauty, feel they are responsible custodians of this unique landscape which surround them. Each Parish report emphasises their sense of responsibility and local knowledge. For example, Theberton/Eastbridge and Blythburgh have produced a very detailed analysis of the issues in their own Submission. Parishes want their

concerns answered and further research to be undertaken before Sizewell is built. It is also envisaged that aspects of the ecological effect will only become clear once building has begun – so there is a need to keep talking to Sizewell during the building programme. The following are the collective points for consideration of EDF, which include all the SPLG participating Parish Councils:

- *A need for more environmental research assessment to help mitigate the impact of the building programme on these ecological sensitive areas.*
- *A better understanding of the effect of what one environmental impact at Sizewell can have on another further up the coast.*
- *To require EDF to minimise the effect of light pollution on areas along the coast, of particular concern (dark sky) at Darsham, Dunwich, Blythburgh, Walberswick and Westleton.*
- *The need to explore further the economic/environmental impact upon tourism in the coastal area and identify the level of mitigation required to protect tourism. Much stock is placed by EDF on the envisaged contribution to the local economy of some £3-4 billion during the station's operational life. But income from tourism, at current levels, would be £100 billion during that time. And this could be seriously threatened by the manifestation of Sizewell C.*
- *That land requisitioned for building purposes, including borrow pits and spoil heaps, be returned to its original state.*
- *That the 6 ha of Sizewell Marsh SSSI be not used for building purposes at Sizewell C.*
- *The replacement of the unsightly tall pylons with underground cables at Sizewell, as originally intended.*
- *To safeguard the environment during the building period there should be a monitoring system in place between EDF and the Parish Councils.*

3 Worker Accommodation

The response from all SPLG Parish Councils to the EDF proposal to accommodate workers on one site in Eastbridge is universally negative. Basically, Parish Councils are concerned over several issues related to the site at Eastbridge:

- *The accommodation site for 2400 workers will overwhelm the small village of Eastbridge.*
- *The SPLG preference highlighted in Consultation 1 & 2 is for a split site, similar to the accommodation provided by EDF at Hinckley Point. By this means the workers personal traffic is more manageable and the height and size of the accommodation is less intrusive on the rural environment.*
- *2400 workers (away from home with money in their pockets) accommodated within striking distance close to villages and in particular Leiston, raises vital security concerns, emanating from the difficulties experienced during construction of Sizewell B, and the aftermath it left.*
- *The split worker accommodation, similar to that provided at Hinckley Point should be constructed to ensure it becomes legacy housing for local people after completion of the Sizewell C building programme.*

4 Transport

Roads and transport are the most contentious issues presented by each Parish Council's submission to EDF. Without a doubt these individual Submissions reflect an anxiety and opposition to the proposals and their implications provided by the EDF Stage 3 Submission.

- *The A12 is the main road to Sizewell from both south and north, and is of particular concern for those Parish Councils which lie along its route. The Parishes in the north of the route envisage traffic congestion, particularly from Blythburgh to Kelsale and where other roads connect to the A12 (A1120, B1122, A144 and A145). Congestion will also be caused by new roundabouts at Darsham, Yoxford and at Kelsale and the level crossing closures at Darsham and on the B1122. There is a call for mitigation measures to alleviate the impact upon the Yoxford residents who live between the A12 and B1122. Also there is a lack of transparency on traffic modelling, particularly through the A12/A1120 at Yoxford. At the south end of the A12 is the serious environmental impact on Farnham, Great Glemham, Marlsford and Wickham Market. EDF are referred to the Submissions from Marlsford and Great Glemham for detailed explanation. The A12 issue begins on the A14 and continues through Martlesham and Woodbridge to Kelsale and Blythburgh. The A12 is seen as not fit for purpose in terms of its width, safety of residents and air pollution. Finally, the undoubted congestion caused by the closure, in high winds, of the Orwell Bridge. The only aspect welcomed by some parishes is for the two villages' by-pass at Farnham, which might become 4 villages if expenditure is approved by government. However, it is proposed that the two villages route be modified to avoid*

housing/farms and ancient woodland and could benefit from being a dual carriageway to improve traffic flow and reduce pollution.

- *The B1122 is the current access between the A12 and Sizewell C. Basically, the EDF plan for a by-pass round Theberton and a new link road from Middleton to the A12 is strongly opposed by Parish Councils on its route, as it does not resolve the issues of access, noise, pollution or safety.*
- *The B1125 is the road from Blythburgh via Westleton, Middleton to Theberton. Walberswick uses this route to exit its village. These villages anticipate this road will be used by cars and vans to the building site at Sizewell C. Their concern is such that they want EDF to install vehicle plate recognition cameras, particularly at Blythburgh to control a potential transport problem.*
- *The SPLG Consultation 2 submission was strongly in support of a rail strategy. An alternative to the EDF A12/B1122 road strategy is to adopt the rail proposal which, at this stage, is only an outline possibility. Apparently Network Rail is lukewarm and the rail led scheme carries the disadvantage of 33 level crossing re-sightings or closures, and curtailment of by-roads, causing considerable local hardship. EDF's own figures say 5 trains a day will supplant 500 vehicle movements. But it would still permit HGV traffic movements of at least the (unacceptable) levels envisaged in stages 1 and 2, and without any mitigation on the B1122.*
- *The reasonable and practical sea option identified in SPLG Submission 2 states: "Would greatly reduce carrying bulk materials by road and could also obviate the need for hazardous borrow pits and huge spoil heaps, as materials could be brought in and removed." However, EDF in their Stage 3 Submission are against the use of the sea route due to marine life concerns. SPLG recommends, strongly supported by the Parishes, that EDF reconsider the use of the sea option as a means of reducing traffic on the roads. Alternately, EDF should provide stronger evidence why they do not want to carry material by sea.*

What are the solutions to this vexed question about transport? The more one reads individual submissions from Parish councils it becomes clear that one over-riding view is expressed - the adoption of D2, a new road from the A12 near Benhall to Sizewell C. This route avoids the B1122, B1125 and Yoxford. The new direct access could save at least 150 fatal or serious accidents during the build and dramatically reduce pollution from vehicles. It might obviate the need for a roundabout at Yoxford, easing traffic flow there. However, Darsham (Park & Ride) would still require a roundabout to deal with traffic from the north. Benhall will also require some mitigation measures to counteract the building of D2. SPLG recommends that the finance earmarked by EDF to build roads around Theberton/Middleton be transferred to the D2 route. With the original sea-led proposal now seemingly quashed, and the rail-led option presenting serious shortcomings, only D2 is seen as a viable answer. Whatever the solution, SPLG and its member Parish Councils will expect EDF and other agencies to build all roads, sea and rail services before construction commences at Sizewell C.

5 Park and Ride

Southern Park and Ride – Wickham Market / Hatcheston

As 85% of construction traffic is proposed to come from the south this Park & Ride facility is needed, particularly if there are hold ups on current roads leading to the Sizewell C site. The Parish Councils' recommend that the Park & Ride should be operational before EDF commencing their building programme at Sizewell C. However, there is a call to site the Park & Ride further south on the A12 at Martlesham in order to reduce traffic flow and pollution near Wickham Market/Hatcheston/Marlsford.

Northern Park and Ride – Darsham

Darsham station and its level crossing on the A12 is potentially a traffic blocking problem when the gates are closed for trains or servicing. SPLG considers that congestion will occur where the A144 and A145 joins the A12, and at the Jet Garage and proposed motel at Darsham. There is also no footpath between the station and the Park & Ride to keep pedestrians safe from traffic on the A12. Darsham and its neighbour Councils consider there is a lost legacy opportunity if part of the Park & Ride is not used to fulfil a need for urgently required additional parking facilities at the station. Finally, car sharing should be implemented to reduce road traffic.

6 People and Economy

During Consultations 1 & 2 infrastructure issues, such as roads and transport, tended to occupy the agenda of Town and Parish Councils. The personal effect of building Sizewell C on local people and a need for community resources was not fully addressed. The SPLG submission at Stage 2 Consultation (item 13) opened the debate on the need for

EDF finance to support personal needs and to monitor together the impact of the building programme. Some Parish Councils' in their Stage 3 Submissions have identified a number issues which should be addressed. EDF indicate in Consultation 3 that the community will need mitigation measures to alleviate the impact of the building programme. This recognition of care and responsibility towards the community is to be welcomed, including an outline proposal for a community fund.

Concerns are focussed on six areas- Education, Health and Wellbeing, Leisure, Housing, Tourism and Security. However, evidence about concerns may not materialise until building work has begun at Sizewell, so at this stage there is some speculation of likely outcomes. Also it may be found that issues around, for example, transport pollution have a detrimental effect on health and wellbeing. Therefore, there is bound to be an overlap between the effects of one issue on another. However, the central point for the following areas of concern is the finance required to provide mitigation measures by EDF.

- 1. Education:** *To alleviate the EDF policy of recruiting skilled workers from outside the area, SPLG emphasizes that education and training resources for local children, young people and adults be available for personal and career development, not only during the building period but over the lifetime of Sizewell C. That training facilities be sited in the immediate area of Sizewell, to counter the lack of public transport to regional colleges.*
- 2. Heath & Wellbeing:** *The population in towns and villages is expanding rapidly. Demographic trends include retirees with special need, which has placed pressure on surgeries, mental health and hospitals. An influx of worker, some with families, will seriously affect healthcare provision.*
- 3. Leisure:** *Sports, culture and social situations have suffered in the past 10 years from a lack of long term investment in buildings, staff and running costs for children, young people and adults. The EDF Community Fund appears to only provide small grants for running costs. EDF is requested to review the level and range of its financial contribution to the Community Fund.*
- 4. Tourism:** *A valued economic contributor to the local community, especially employment. The effects upon the tourist industry will need to be monitored and mitigation funding identified.*
- 5. Housing:** *Worker accommodation is provided but long stay technical staff may seek to rent or buy property in the area. The housing market may come under pressure and rental prices rise, pushing local people away from their area. SPLG requires financial details of the proposed Housing Fund from EDF. Related to housing is the issue of maintenance. Due to the needs of skilled workers at Sizewell C there is likely to be a shortage of electricians, plumbers and builders to service local homes.*
- 6. Security:** *The influx of a huge group of workers into a rural area is likely to produce tensions in the community-issues for example around alcohol, drugs and various kinds of personal exploitation. EDF is being unrealistic to expect workers to remain in their Eastbridge accommodation and not venture out into the local community. Although EDF have strict rules governing worker behaviour, never the less the community may require extra resources for the Police and Social Services. This is an issue that should require regular monitored.*

7. Further consideration - other concurrent construction projects

SPLG in this Submission has highlighted the concerns of Parish Councils' about building a nuclear power station in a rural area, without any major road infrastructure-unlike Hinkley Point with access to the motorway system (M4 and M5). Into this Sizewell equation is the major work to be undertaken shortly by Scottish Power in Friston and other schemes such as the European electrical link, 10,000 additional homes and year round tourist traffic, which will only exacerbate the transport concerns. SPLG urges EDF to work together with the other companies involved to minimize transport disruption, including the ability of the ambulance service to attend emergencies. All the projects would benefit from the adoption of the D2 road and they are urged to pool their financially resources to build it.

8 Legacy

Parish Councils have expressed the need to continue constructive discussions with EDF to resolve the issues which have been identified in the SPLG Submission. Beyond the completion phase of building Sizewell C, there is a case to continue some form of regular consultation with EDF. This will enable local groups to participate in monitoring the continuing effects of Sizewell C upon their community. For example, to avoid the boom and bust economics of Sizewell B, the local community will hopefully benefit from some, but it appears limited, local employment and education and training for subsequent generations of young people. As the major player and income generator in the area, Sizewell C should consider not only to continue monitoring its affects upon the locality but provide a financial contribution to the personal development of people through a substantial Community Fund.

Acknowledgements: This SPLG Submission has been prepared with the help and assistance of the following councils and organisations:

Blythburgh PC, Darsham PC, Farnham and Stratford St Andrew PC, Middleton PC, Theberton and Eastbridge PC, Yoxford PC, Dunwich Parish Meeting, Marlsford PC, Great Glemham PC, Minsmere Levels Stakeholders Group, Suffolk Preservation Society, Kelsale PC and Walberswick PC.