

Sizewell Parishes Liaison Group Response to PINS on the EDF Sizewell C EIA Scoping Report – May 2014

1. Introduction and context

- 1.1 This document has been prepared by the Sizewell Parishes Liaison Group (SPLG) in response to the EDFE Sizewell C EIA Scoping Report (hereafter SR) submitted to the Planning Inspectorate (PINS) and published on their website. This document has been drafted by the SPLG Steering Group. Given the in-feasibly short time review, there has not been the opportunity as yet to incorporate the full detailed views of all the SPLG members – this will be done in the coming weeks. This document is distinct from any 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 protect as far as possible, the huge impact EDFE's proposals will have on our communities, and 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 The SPLG is considered an 'other relevant organisation' from whom the developer is seeking views (see the SR para 1.3.2. The SPLG provides a focus and clear point of contact for information exchange between PINS and the developer, and the local interests and communities.
- 1.5 The Group can be contacted through the Secretary, Malcolm Blakeney, or the Chairman, Jon Swallow. Contact details are on our website.

2. Background

- 2.1 Along with many other consultees, the SPLG submitted a response to the EDFE Stage 1 Consultation documents in early February 2014. As yet, no response has been provided, either directly or even generally in the EIA Scoping Report. Thus it is unclear to what extent, if any, the responses to the Stage 1 Consultation 'continue to inform the ongoing development of EDFE's proposals'. This goes against the PINS advice, expressed to EDFE at their meeting of 31/10/2013, that the Stage 1 responses be commented on before embarking on further stages.
- 2.3 Some indication of the EDFE plans and attitude can be interpreted from the events at Hinkley.
- 2.4 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 £16 billion.

The SPLG consider the practical details of construction and cost are not sufficiently developed to enable meaningful consultation to take place, but clearly the proposed development could be expected to have of the order of twice the construction impact of the work in 1988 to 1995 when Sizewell B was built.

- 2.5 The whole PINS led process has been seriously called into question with the Government agreement with the commercial operators of Hinkley C and the planned Sizewell C to have a reduced minimum 'strike price' Government guarantee if the latter goes ahead. Thus Government has a significant financial interest in the completion of the Sizewell C development, over and above the National Infrastructure Projects process.

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, and hence the fundamentals of environmental impact mitigation.

- 2.6 The SPLG welcome the abandonment of the P&R proposal east of Yoxford.

3. The EIA Scoping Report process

- 3.1 The EIA Scoping Report has been issued with a four week deadline for comments – challenging for statutory NGO responses, and impossible for any democratically determined response.

The view of the SPLG is that more time should have been given for responses.

- 3.3 The SR has been issued before any developer's response to the Stage 1 consultation submissions have been given, or indeed the Stage 1 submissions being made public between the consultees. The vague remarks about ongoing analytical work are unsupported by any programme for publication or sharing beyond the 'privileged information' community. Thus it is impossible for any third party to make any meaningful quantified comment on the unsupported developer's assertions as to the proposed geographic scope and level of detail of the environmental studies.

The SPLG consider the process lacking in detailed information from EDFE.

There is a fundamentally flawed limitation in the proposed EIA Scope. The existing rural road the B1122 (serving Middleton, Theberton, and the north of Leiston) which currently provides one of the links between the A12 and the current Sizewell A and B sites, is a minor, substandard 'B' road, generally lacking in footways, often with poor vertical and horizontal alignments and visibility. This route was used, with considerable traffic, environmental and safety problems, during the much smaller Sizewell B construction. Since then, a few minor localised capacity and pavement strength improvements have been undertaken to mitigate the traffic impact of several interim

maintenance projects at the Sizewell site, but with continuing and rising levels of roadside environmental impact. The Scoping Report makes no mention of any study of the impact of the proposed development on this route, or of any proposals for the creation of a new route. The most serious omission in the Scoping Report is any consideration of the impact upon future emergency evacuation movements, or access for emergency vehicles, on the B1122 or any realignment of it, or a new route. In our view, a new wide two-lane road should be provided to give uncongested, safe, shorter and more convenient access to all four power stations.

- 3.4 This document has been structured to respond as far as possible to the structure put forward in the EDFE SR. It is therefore somewhat repetitive, reflecting the developer's text.

4. Overall views on the Scoping Report

- 4.1 In general, the SPLG are of the view that the SR lacks ambition and wider vision. While it deals in superficial and repetitive generalities with regard to the immediate developer's concerns about the site and required construction logistics, it ignores almost completely the serious wider environmental impacts and their mitigation. The SPLG set out in their Stage 1 consultation response (and so, presumably, did other consultees) a wide ranging list of impact concerns, and ideas for their mitigation. These appear to have been ignored, without explanation, and are not mentioned or addressed in the SR.
- 3.2 For example, the SPLG suggested some £140M (2013 prices) of transport related investment to mitigate the construction activity – possibly some 1.5% of the construction cost. EDFE have neither explained how they have taken these suggestions into account, nor recognised the need to consider them as part of the DCO Application process.

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.

5. Views on the SR – Chapter 6 - EIA – project-wide considerations

- 5.1 (para 6.1.1) EDFE claim to have undertaken 'a range of.... studies'. None of these have been shared with other interested parties, and so the vague assurances of on-going work cannot be commented on. This is regrettable, since it is clearly desirable to progress the development of 'agreed matters' and the Statement of Common Ground (SoCG). This development of agreed matters can only happen in the context of a validated evidence base.

The SPLG urges the PINS to press the developer to take an active and inclusive approach to expanding the range of agreed matters. If not, local interests will focus on objecting to, rather than co-operating with, the developer's proposals.

- 5.3 (para 6.2.1) This claims that the Section ‘details’ the approach – no details are provided.
- 5.4 (para 6.2.2) Reference is made to several sources for the initial Gravity Model work, but these exclude the most relevant current source of evidence – the on-going debate in West Somerset regarding the Hinkley C workforce accommodation planning.
- 5.5 (para 6.2.7) The outline details given at Stage 1, and the partial hints given in this paragraph, suggest the Gravity Model forecast approach is flawed, self-fulfilling and essentially tautological. The 60 minute limit for non-home based worker commuting time is considered high, and so is accepted.
- 5.6 (para 6.2.15) The principle of an iterative approach to progressing the various technical studies is endorsed – but sharing of these studies has yet to start.
- 5.7 (para 6.2.32) No suggestions are made as to how the on/off site split of accommodation within the NHB worker category are made, and so no understanding of the environmental impact of the commuting traffic is possible.
- 5.8 (para 6.3.2) This claims that details of the Transport Assessment can be found in Section 2.3 – in fact paras 2.3.8 and 2.3.9 contain no details, and refer the reader back to this Section 6.3 for ‘a summary’!
- 5.9 (para 6.3.7) Only a vague outline of the work to date is provided; SCC the highway authority is involved, but cannot share ‘protected matters’, and has its own priorities and agenda; no information is provided on what is proposed to inform the environmental impact of junction improvements – for example at the adjacent B1122 and A1120 junctions with the A12 in Yoxford.
- 5.10 (para 6.3.8) It is stated that the VISUM modelling will be WebTAG compliant. Evidence of the model validation in line with WebTAG, at a level of detail sufficient to discuss the impacts on the B1122 or alternative alignments, and on the A1120 and the B1125 is required to justify this statement. Such evidence is also needed before any useful quantified discussion can take place on local traffic impacts and their environmental implications.
- 5.11 (para 6.3.14) The broad geographic extent of the VISUM model appears sufficient, although no justification (along the lines set out in paras 6.3.26 to 6.3.30) are provided. No information is provided on the level of detail being used (for example number of zones and locations of connectors). This is a fundamental omission from a Scoping Report.
- 5.12 (para 6.3.48) Consideration will be needed regarding the recently widened area of emergency evacuation from the urban areas now included in the locations downwind of the power stations. Any traffic studies of the operational phase should include this, but no mention is made of what evacuation measures might be required, or their environmental impact.

- 5.13 (para 6.3.53) The promise is made to publish ‘initial estimates’ of additional traffic as part of ‘the next stage of public consultation’. It is essential that these are supported by some equivalent details of the validation of the base model on which they are based.
- 5.14 (para 6.3.54) No evidence has been offered to justify the limitation of the EIA scope to the existing A12 and B1122 routes. The existing A1120 and B1125, and an envelope of possible new Sizewell Relief Road alignments, should be included in the environmental impact scope.
- 5.15 (para 6.3.57 to 6.3.64) These paragraphs reiterate the developer’s unsupported range of mitigation measures, without commenting on the probably many others raised in the responses to the Stage 1 consultation. Limiting the scope of the EIA to these minimal pre-determined measures without analysis, justification or comment as to how the consultees’ suggestions have been considered is considered to arbitrarily limit the scope of the Scoping Report.
- 5.16 (para 6.3.61) As repeatedly pointed out, until validated and agreed traffic impact analyses have been agreed, any EIA needs to consider the potential impact not just on the Farnham bend, the A12/B1122 junction and the B1122 itself, but also:
- An envelope of possible Sizewell Relief Road alignments, from the A12 to the developer’s site;
 - The B1125 and its junctions with the A12 and the B1122;
 - The A1120 and its junctions with the A12;
 - The B1119; and
 - Emergency access and evacuation should the B1122 be blocked.

It is accepted that as far as possible construction worker commuting should be managed as part of an integrated accommodation and travel plan, with clearly justified ‘carrots’ and ‘sticks’ backed by persuasive evidence. No such plan has been offered, and until it is, the EIA should adopt a precautionary approach.

6. Views on SR – Chapter 7 - EIA – main development site

- 6.3 Surely a new Sizewell Relief Road is needed to provide secondary access to 4 nuclear power stations.

7. Views on SR – Chapter 8 - EIA – off-site associated development

- 7.3 This bland and repetitive Chapter limits itself to those off-site developments which the developer, without explanation or justification, claims are necessary. There is no narrative as to how EDFE has considered and rejected the suggestions from other parties. Unless detailed justifications for such rejections are published, the EIA Scope is open to question.
- 7.4 (para 8.1.4) The justification for the socio-economic and transport have not been dealt with in any depth in Chapter 6.

- 7.5 Additional traffic will be generated along the B1122 from the proposal by EDFE to have bus pick-ups from Darsham Station to the site.
- 7.6 Additional traffic will be generated along the B1122 from the proposal by EDFE to have bus pick-ups from Saxmundham Station to the site.
- 7.7 Additional traffic will be generated along the B1122 from the proposal by EDFE to have direct bus services for workers from Ipswich and Lowestoft.
- 7.8 The treatment of the alternative rail alignments in Section 8.4 should include consideration of the suggestion that one of the alternative alignments for the Sizewell link Road could be developed alongside the rail route.
- 7.9 The treatment of the expected problems at the Farnham Bend are limited to minor localised interventions, and so the the proposed EIA scope is similarly limited. This limitation has not yet been justified by validated and agreed traffic model results, and so is premature.
- 7.10 Comments on the Visitors Centre pale into insignificance when compared to the devastating effect Sizewell C will have on tourism along this coast.
- 7.11 By far the most serious, and indeed fatal, omission in the Scoping Report is any consideration of the environmental impact of the Sizewell C construction and operation traffic, and future emergency evacuation movements, on the B1122 itself, and on a range of new route alignments. Until justified otherwise by validated traffic model results, it is the judgement of the SPLG that either major on-line strengthening, alignment improvement, and junction enlargement will be required, or more likely (and possibly less environmentally damaging) that a new wide single two lane route will be the appropriate solution to provide un-congested, safe, and convenient access to the four power stations. These options must be recognised in the EIA SR to make it credible, and arguably lawful.

8. Main SPLG concerns

In summary, our main concerns are the location of the accommodation campus, the use of the B1122, the impact on this fragile coastline and environment, and the noise, light and air pollution. With regard to light pollution, as far as we are aware, artificial light has not yet been raised as a major issue. However, we are concerned about its impact on the night sky, particularly during construction of the power station – from the construction and fabrication areas as well as the workers campus. There is no reference to the problem at all in the scoping report. One of the pleasures of living in this part of Suffolk, and a major factor for tourism in this coastal area, is the lack of light pollution. Much more detailed information is required from EDFE on how they intend to deal with the likely huge problem of light pollution. The impact on the night sky must be protected, and much reduced.

9. Conclusions

- 12.1 The SPLG consider that the limitations in the proposed EIA geographic scope and treatment of potential impact mitigation measures are unsupported by any quantified analysis, or discussion of their consideration of Stage 1 submissions, and hence render it fundamentally flawed. The SPLG request that the PINS consider the arguments in this Response, and advise the developer accordingly.
- 12.2 The lack of any progress from EDFE so far to engage with local interests to establish a basis on agreed matters and Statements of Common ground mean that the submission of the request for a formal scoping opinion is premature, and should be rejected by PINS.

The SPLG requirements.

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		

10. The SPLG Recommendations

- 6.1 Funding should be made available by EDFE for necessary infrastructure works, including a new relief 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.

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.