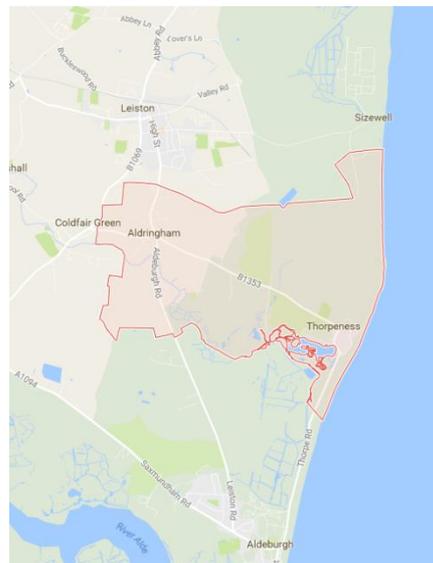


Aldringham-cum-Thorpe Parish Council response to Sizewell C: Stage 2 Consultation

Date : 2nd February, 2017



Preface

We understand that the stage 2 pre-application consultation document builds on the details sets out in EDF Energy's stage 1 pre-application consultation document, identifying EDF Energy's preferred options for the new power station and the associated developments in support of its construction and operation. However, the consultation still remains at a very high level and therefore makes it very difficult, even at stage 2, to give informed detailed responses to many of the issues. Aldringham-cum-Thorpe Parish Council has provided comment as far as it has been possible considering the limited information that is available in written form, through discussion and via presentations.

1.0 Introduction

1.1 Parish Overview

The parish of Aldringham-cum-Thorpe is immediately south of the nuclear site and within the Emergency Zone. It includes the villages of Aldringham and Thorpeness together with parts of Sizewell. Aldringham has an historical base with a church, school and pub. It consists of an essentially linear settlement between Leiston and Aldeburgh. The coastal hamlet of Thorpe was developed a century ago into the holiday village of Thorpeness which combines residential, second home and rental occupation with a strong cultural heritage and significant tourism activity. There is a 4:1 seasonal population swing with the residential age distribution skewed to the upper quartile.

The future sustainability of the villages is challenging, and work is currently being carried out by the parish council including the development of a Neighbourhood Plan, which encompasses a detailed review of coastal impacts, housing and people, business, tourism and community buildings. The building of Sizewell C could significantly benefit the work the Parish Council is doing to enhance the quality of life of these communities but at the same time it may overwhelm the very limited parish resource we have available and significantly impact the number of tourist visiting the area during the lengthy construction phase.

1.2 Our beliefs

As we are being asked to host two new nuclear reactors it should be recognised by both Central Government and EDF Energy alike that there are wider implications that our local communities will have to bear in accepting the disturbance and consequences of this nationally significant project. We believe that these communities can reasonably expect some reward for the dis-benefit of living within a nuclear emergency planning zone. This should be provided through practical support in order for impacted communities to maintain their quality of life and be assured of a sustainable future.

It appears that the principle of providing long term benefit for our communities has not been a consideration when determining the preferred options, and that EDF Energy has only accepted that it needs to meet its statutory obligations in addition to providing only the minimum that is required for the construction and operation of the site.

Aldringham-cum-Thorpe Parish Council require EDF Energy to work with us, and all of the relevant stakeholders, to investigate how every pound spent on supporting the building of Sizewell C could also deliver lasting legacy benefit, and therefore clearly demonstrate EDF Energy's commitment to sustainability and the goal to reuse and recycle wherever possible.

2.0 Overall Concerns

Aldringham-cum-Thorpe Parish Council recognises the contribution Sizewell C will make to the nation's energy resources and the economic opportunities it could afford locally. These benefits have to be balanced against the impacts on the environment and the pressures on our communities and transport network.

Aldringham-cum-Thorpe Parish Council will require significantly more detail and information in the next stages of consultation in order to be able to consider and, where applicable, support the appropriate mitigation or compensation for the significant negative impacts of the development.

There is much more work for EDF Energy to do to convince us that their plans will meet the expectations that we have placed upon them on behalf of our Parish and satisfactorily demonstrated that, for each of the proposed options, provision for long term benefit, legacy and sustainability has been part of the decision-making model when determining the best option. This should be a key principle in the decision making process.

3.0 Question 1 - Sizewell C Proposals: Overall

The station is located one mile north of our parish boundary and will have significant impact on our communities. Section 3.2.39 of the EDF Energy Environmental Report states that EDF Energy will work to optimise the economic benefits generated by the project for the communities within and surrounding the Sizewell area and, where necessary, mitigate potential adverse impacts.

The site is located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) on the Suffolk Heritage Coast. It also borders, and lies partly within, an area of ecological sensitivity, including the Sizewell marshes SSSI and other environmentally designated sites. Because of this very sensitive location we would expect EDF Energy to treat this project, including the station design, as an environmental exemplar.

Aldringham-cum-Thorpe Parish Council expect EDF Energy to treat this project, including the Station Design and its surrounding area, as an environmental exemplar.

Local communities are already faced with many challenges. Issues such as site allocation, housing development (affordable, rented, holiday homes etc.), leisure facilities and heritage already challenge our parish resources. The construction of Sizewell C will significantly add to these pressures, but also has the potential to provide longer term demographic and re-generation benefits for the future sustainability of local communities (which will include an increasing number of EDF Energy employees and contractors). By working together as good

neighbours the Parish Council and EDF Energy representatives could make a substantial contribution to the local communities.

Aldringham-cum-Thorpe Parish Council believes one of EDF Energy's contributions to the community should include the provision of suitably qualified people to work with parishes to ensure that their future plans for sustainable communities can be jointly delivered.

Details of the Sizewell B facilities that have to be relocated to accommodate Sizewell C should be included in this document to give a complete picture of the impacts of the new site.

4.0 Question 2 - Main Development Site: Environment

4.1 Character & Environment

The loss of designated habitat must be minimised and every attempt made to restore and improve the habitat as soon as possible and, where that is not possible, seek to provide equivalent or better habitat elsewhere.

Visual impact must be minimised by sympathetic design to the standard set by that applied to Sizewell B. Appropriate landscaping and screening should be introduced to minimise visual impact on the coast and the neighbouring communities.

The area is very sensitive and has many designations, SSSI, ANOB, RAMSAR, SAC... The temporary and permanent sites cover large areas of designated land, there is no evidence provided to support the requirement to utilise all of the land identified in the diagrams. EDF should work to reduce the take up of land and where possible seek alternatives where there is no impact on designated sites.

This area supports many recreational activities and EDF Energy must ensure that people can continue to have access to and are able to enjoy their given pursuits.

There are a number of historically important sites within the area and EDF must demonstrate their willingness to preserve and protect them as our future heritage

Noise, vibration and light pollution all have the potential to inflict a significant impact on the quality of life for residents and visitors to our Parish. There are no details, even from previous construction, of how this may be mitigated. E.g. downward focused lights may be used but requirements must be assessed to avoid providing more light than is needed for safe operation on the site.

Although EDF Energy recognise the environmental importance of this area and the implications of the Sizewell C development on the issue identified above, there is little detail of how they will be dealt with and the uniqueness of the area will be preserved.

For each of the areas identified above, Aldringham-cum-Thorpe Parish Council requires EDF Energy to work with the local government, statutory agencies, local communities and interest groups to develop acceptable proposals to resolve these issues or mitigate their impact.

4.2 Coastal Process

Aldringham-cum-Thorpe Parish Council is concerned with the possible coastal impact of a Sizewell C project, primarily between the parish boundaries at Sizewell and south of Thorpeness. We have reviewed the Stage 2 Pre-Application Consultation document and Members have visited EDF public exhibitions. No specific and quantified evidence has been presented to enable us to assess the magnitude, geographical and timescale extent of shoreline and groundwater impacts from SZC.

The Sizewell C EIA Scoping Report April 2014 contained sections on groundwater, surface water, coastal geomorphology and hydrodynamics. These included proposals for further studies, sensitivity assessment, impact evaluation and mitigation. We understand that EDF Energy's continuing work is shared with a forum of Statutory Bodies and their advisors, but that confidentiality agreements prevent it being shared with us.

These restrictions fail to recognise that ATPC has essential and detailed working arrangements with statutory authorities for ongoing coastal management of which SZC would form a part. Withholding information about the significance of impacts would hardly stand a test of reasonableness in giving evidence to a DCO examination. ATPC is currently preparing a Neighbourhood Plan under Localism legislation.

We therefore consider it essential for EDF Energy to adjust its arrangements with Suffolk Coastal District Council and the Environment Agency in particular, if they agree, to enable our accredited representatives to have access to relevant SZC information. This should be done immediately following Stage 2 consultation in order for us to have quantified evidence before Stage 3 and any subsequent input to the Planning Inspectorate.

We would be pleased to discuss the information we need in more detail. In principle, the modelled results should be mapped for each impact category showing where magnitudes, positive or negative, exceed naturally expected variations using a realistically predictable baseline. Changes in parameters including wave data, bathymetry, sediment volumes, water levels, would then translate to potential change in shoreline and landform against time.

In relation to SMP policies and epochs we need to assess the extent of impacts adjacent to the EDF Energy site, and more widely in the sediment cell, during construction, operation and post operation. Results would include recent climate change projections (e.g. BEEMS 2014). Monitoring and proposals for mitigation of EDF Energy impacts would be assessed before co-ordination with any other planned interventions as part of integrated coastal management.

Summary of typical issues we wish to pursue

At Stage 2 we expect to see the quantified results so far on the assessments detailed in sections 7.11, 7.12, and 7.13 of the EDF Energy EIA Scoping Report, and the associated issues raised in the Planning Inspectorate Opinion Report, including those by consultees in Appendix 2. This would indicate the relative scale of possible impacts to inform our participation in coastal management planning. We appreciate that impact sensitivity analysis is ongoing pending further design work. But release of information only at a minimum duration Stage 3 period would not be acceptable. Information available to us via the Statutory Bodies route could add the value of their expert advisors, including relationships to non-EDF Energy coastal work already underway.

We note EIA Scoping Report section 7.13.3: *Most effects, such as changed wave climate due to the jetty, will be localised often to within a few tens of metres of the construction site and require high resolution modelling on a small scale. However, longshore sediment transport is a long-term process and acts over larger scales, typically the sediment cell.*

Changes in groundwater and surface water pathways, together with projected water level changes must be quantified. These must include the cut-off wall, drainage changes, dewatering, pumping, catchment changes and other associated changes over the construction and operating timeframes.

Retaining the option to re-position the operating platform landward, and the design of EDF Energy defense terminations must result in the avoidance of shoreline discontinuities which accelerate inappropriate coastal realignment, and deviation from the SMP.

We note that the original CEGB assessment of site appropriateness may no longer hold towards a 2130 horizon with permanently flooded northern and western boundaries which increase radiological risk from leaching, spillage and emergency access to significant incidents.

Clarity of why a permanent BLF is needed, e.g. that turbine rotors cannot be transported by road, as now.

Clarity about the draught of vessels which would enable a jetty or BLF to be used without dredging.

Concern that the cost and logistics of removing a heavily piled jetty, and the history of the inability to control EPR construction timeframes, would result in it remaining indefinitely. However, a jetty could be designed to have positive benefits for the coastal environment.

Credible programme management proposals are omitted. Concern that fabrication problems and the lack of any EPR operating experience to date could result in adverse local impacts from a heavily extended SZC pre-operational period.

Review that the rock armour toe depth is sufficient and that its littoral profile avoids end embayment particularly with NE long-fetch wave climates.

Demonstrate whether sediment transport impacts cross the coastal process system interface at Thorpe Ness. Correct the references to Thorpeness and Thorpe Ness.

Cooling water intakes and outfalls are taken to have insignificant shoreline impact.

Clarify whether North Sea dredging for construction aggregate is an option, and a possible licence area.

In summary, the mapping approach would show impacts beyond natural change which would be:

- (a) negligible or highly localised
- (b) containable within the EDF Energy frontage
- (c) wider ranging and which might require mitigation / ongoing monitoring

4.3 Marine ecology, water quality and fisheries

It is essential that the marine ecology is not adversely affected by any construction or operational activities carried out at Sizewell, including commercial and recreational fishing which is important to preserving the individual character of our coast.

Flood risk is an essential part of the Shoreline Management Plan and is covered mainly by the comments on coastal processes above.

4.4 Permanent Development

The finishes shown do not match the high standard achieved on the Sizewell B station and unless EDF apply additional measures it will fail to meet the standard expected by the local communities.

Aldringham-cum-Thorpe Parish Council seek assurance that EDF Energy will demonstrate that the permanent structures and services will be built in such a way as to give maximum respect to the environment in which they sit and afford minimum impact on the surrounding communities.

If EDF Energy intend to use a dry fuel store on site it should be shown on the layout in a location where it is robust against coastal change beyond the decommissioning period and should be built to the same standards as the main station.

The provision of a Visitors Centre appears to have been removed from the Stage 2 proposal. Such a facility is a valuable asset during construction and would provide a long-term resource and benefit to the community and visitors alike for the entire life of the station.

Aldringham-cum-Thorpe Parish Council seeks assurance that a Visitors' Centre will be provided and remain as an effective and enduring facility for the area.

4.5 Beach access

During the construction phase it is essential that access to the beach is maintained at all times, as this area is widely used for recreation by many different people.

4.6 Restoration

Although no details are provided for landscaping in the short and long term, the design must be robust and should be carried out as soon as possible and in such a way that it delivers not only restoration but enhancements to the surrounding area.

Aldringham-cum-Thorpe Parish Council seeks assurance that before any activities commence at the Sizewell C Site, agreed detailed arrangements are in place which give confidence that the above issues have been suitably addressed.

5.0 Question 3 - Main Development Site: New Access Road

Aldringham-cum-Thorpe Parish Council preference is option 3 – Three span bridges, primarily due to the fact that this option facilitates free flow of both water and wildlife and has the smallest footprint. However, there is very limited, if any, environmental impact information on any of the options offered.

Option 1 is a causeway that will impede the flow of water and particularly wildlife and is of a larger footprint. This option is not supported.

Option 2 requires multiple phases and will limit the flow of and wildlife and has a larger footprint. This option is not supported.

Option 4 is a causeway that will impede the flow of water and particularly wildlife and is the largest footprint. This option is not supported.

6.0 Question 4 - Main Development Sites: Managing Construction Materials

Whilst there is no direct impact on the Parish of Aldringham-cum-Thorpe, there is a concern over the excessive height of the 'borrow-pits', and therefore the potential visual impact on the area as a whole. All three options presented offer a unique combination of just two fields. If a combination of three or more fields was implemented this should reduce the overall height of the 'borrow-pit'. This also has the potential to reduce the visual impact from the north.

7.0 Question 5 - Accommodation: Overall Strategy

The proposed accommodation strategy relies heavily on a large temporary accommodation campus for 2,400 workers on a single site adjacent to the construction site. This is considered to be an insufficiently thought through solution, designed to minimise commuter impacts, rather than satisfy existing and future social need. The workforce will be made up

of many social groups with different needs which will be difficult to service on a single campus.

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, a proportion could 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 ongoing EDF Energy use for workers during outages. Some smaller groups of accommodation could be built as permanent accommodation for future use on completion of the stations, for example as elderly people's, low cost or student accommodation.

Providing the sports facilities within the campus precludes its use by the local community both during and after the construction phase. This is an opportunity that should not be overlooked.

8.0 Question 6 - Accommodation: Campus layout

Aldringham-cum-Thorpe Parish Council prefer Option 2 (ii) as it utilises slightly higher accommodation and car parking and therefore has a smaller footprint. It is also contained to the east of Eastbridge Road and has sports facilities remotely located so has the potential for legacy benefit.

Option 1 utilises lower accommodation and car parks, has a much larger footprint and occupies land to the west of Eastbridge Road and is therefore not supported.

Option 2 (i) has higher accommodation and car parking with a smaller footprint. It is also contained to the east of Eastbridge Road but has sports facilities to the east of Eastbridge Road and is therefore not supported.

Aldringham-cum-Thorpe Parish Council is disappointed at the lack of imagination put into the provision of temporary accommodation and the lack of consideration for some dispersed provision of accommodation that is capable of being adapted for legacy use as affordable or community style accommodation and would ask EDF to revisit this whole issue.

Aldringham-cum-Thorpe Parish Council seek assurance that before any activities commence on the site campus EDF Energy will demonstrate that the structures and services will be built in such a way as to give maximum respect to the environment in which they sit and afford minimum impact on the surrounding communities.

9.0 Question 7 - Transport: Overall Strategy

The overall transport strategy is supported by this Parish, particularly the intention to maximise the delivery of material by rail or sea, subject to the detailed comments and preferred options detailed within this response document being addressed.

EDF have recognised that potential transport and traffic issues are of concern to local people and have produced a high-level strategy which identifies a number of options that will help to mitigate these impacts. Although all offer practical solutions many are dependent on other infrastructure proposals.

10.0 Question 8 - Transport: Rail

Aldringham-cum-Thorpe Parish Council prefers option 1, a branch line going straight to the construction site, because it has minimum land use, has no dependency on secondary transport moving goods from the rail head to site and has the potential to remain as a legacy.

Option 2 uses land that could be used a caravan park or for accommodation etc. It also requires alternative transport options to complete the delivery of goods to site from the rail head. This option is not supported.

In finalising the marine / rail balance the need for Network Rail and the operating Franchisees to demonstrate East Suffolk Line working diagrams having realistic perturbation margins which provide reliable passenger mainline connections at Ipswich, the intended Lowestoft-London paths, and increased Felixstowe freight working. This may favour cascaded freight night paths for SZC in a preferred rail option.

The provision of a passing loop with re-commissioning the up platform at Wickham Market is likely to provide legacy benefit in reducing service perturbation delay.

The legacy of the Leiston Branch line providing a rail passenger service or a tourist option is an attractive community ambition which might be helped by the number of people who will need to visit the site professionally. The options of upgrading the branch line and integrating additional train paths into the East Suffolk line or alternatively providing an interchange at Saxmundham should be fully evaluated for feasibility.

11.0 Question 9 - Transport: Sea

The provision of a marine jetty to reduce road and rail traffic is commendable but as EDF states it would be a significant development in its own right and although the design requires to be optimised to facilitate the import and export of materials it is even more important that it is designed in such a way that there is no impact on the coastal processes particularly as it may be maintained for future use. See more detailed comments under section 4.2 above, particularly the lack of detailed information relating to the coastal process.

Aldringham-cum-Thorpe Parish Council would prefer option 3 as it maximises the potential for sea delivery, which will lessen the impact of road based transport.

12.0 Question 10 - Transport: Park and Ride

Aldringham-cum-Thorpe Parish Council support the principle of a Park and Ride approach as this will reduce the volume of traffic approaching the site. However, it will increase the number of HGVs and Buses on the road and it should be noted that for residents adjacent to

the proposed routes the impact of an HGV is considerably greater than that of smaller vehicles as it creates much more intrusive noise and vibration. HGV's also cause considerably more wear and tear to the highways.

Aldringham-cum-Thorpe Parish Council requests EDF to carry out detailed analysis in order to understand the impacts of HGVs relative to smaller vehicles before a final strategy is adopted.

Options for the location of both Northern and Southern Park and Ride sites have no direct impact on Aldringham-cum-Thorpe and should be largely a matter for the local parishes, however we believe as previously stated legacy value should be an important factor when making the decision.

13.0 Question 11 - Transport: Road Improvements – A12

Aldringham-cum-Thorpe Parish Council would prefer to see Option 4 adopted, but it should be combined with the 4-village bypass proposal in a jointly funded scheme with government bodies. A significant legacy benefit could then be achieved for the wider community, including the Sizewell Stations.

14.0 Question 12 - Transport: Road Improvements – Yoxford / B1122

Due to the limited information on traffic flows it is very difficult to identify an appropriate solution. Aldringham-cum-Thorpe Parish Council are leaning towards the option of a roundabout, but it may be more practical to introduce intermittent traffic light control on the roundabout during traffic peaks throughout the construction phase.

Aldringham-cum-Thorpe Parish Council recognises that transport assessment work will continue through the pre-application phase and request to be consulted at each step as proposals are developed and refined.

15.0 Question 13 - People and Economy

The increase in the number of people in the locality created by the Sizewell C workforce will have a significant impact on local infrastructure and services. There is already a concern that the proposed housing developments throughout the area over the next 10 -12 years will saturate existing infrastructure and services (Doctors, Schools, Shops etc.). It is not clear what EDF Energy are planning to do to mitigate this serious concern.

Aldringham-cum-Thorpe Parish Council requests EDF Energy to work with local providers and government bodies to ensure that the quality and level of service is not compromised during the construction phase.

16.0 Question 14 - Consultation Process

Aldringham-cum-Thorpe Parish Council are very disappointed with the lack of detailed information in the Stage 2 Consultation Documents. Several areas have either been left out of the Stage 2 Documentation completely or have no useful information that can be used to make an informed decision. It is also very disappointing that the comments provided on the Stage 1 Consultation appear to have been ignored.

The timing of both Stage 1 and Stage 2 Consultations spanned the Christmas period. This makes responding to the formal process very challenging due to the availability of people over the holiday period.

The Stage 2 Documentation fail to identify any material benefits that EDF Energy are planning to leave for the local communities.

Stage 3 Consultation Documentation must include detailed information addressing the benefits that each option will deliver, the rationale behind choosing the option, the impact that the option will have on either the local community and the environment, and the mitigation that will be deployed. Stage 3 Consultation should not coincide with popular holiday periods.

17.0 Conclusion

Although we at Aldringham-cum-Thorpe have indicated our preferred options within this document the lack of detailed information and analysis make these decisions less than 'informed'. As further evidence becomes available, other options may be more appropriate where they better support of our core beliefs of achieving maximum benefit and legacy whilst minimizing significant impacts.