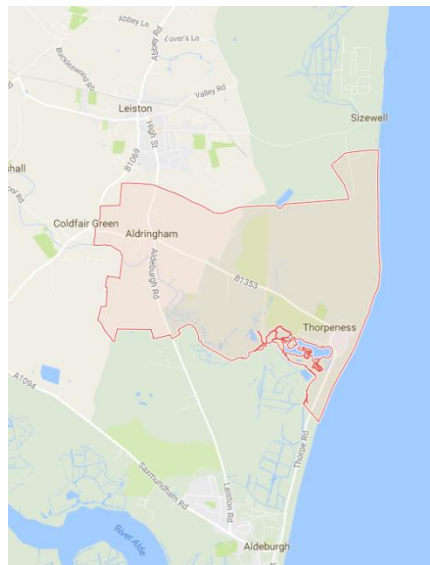


# Aldringham-cum-Thorpe Parish Council response to Sizewell C: Stage 3 Consultation

Date : 27<sup>th</sup> March, 2019



## **Introduction**

The Parish Council have reviewed the extensive Stage 3 Pre-Application Consultation documentation and has, with limited resources, responded as comprehensively as possible. However, given the sheer scale of the issues we have focused our attention on the general issues and those that significantly affect the parish of Aldringham-cum-Thorpe, whilst still addressing to a lesser degree the issues that have particular impact in other areas. Therefore, this response cannot be considered to be complete or indeed to highlight every single issue which is of concern to the communities of Aldringham, Thorpeness and the surrounding areas. However, we fully endorse the comprehensive joint response from Suffolk County Council and Suffolk Coastal District Council which does address the additional issues.

EDF Energy's Stage 3 consultation is grouped under specific topic headings and this response generally follows that order together with the questionnaire numbers, so that it can easily be cross-referenced.

## ***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 historic base with a church 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 two 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.

## ***Our beliefs***

As we are being asked to host two new nuclear reactors and a number of other energy delivery projects it should be recognised by both Central Government, EDF Energy and the other energy companies that there are wide ranging implications that our local communities will have to bear in accepting the disturbance and consequences of these nationally significant projects. We believe that these communities can reasonably expect some reward for the dis-benefit of living within a nuclear emergency planning zone and what is becoming a very significant energy hub. 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 to facilitate the construction and operation of the site.

### ***Overall Concerns***

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.

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.

Local communities are already faced with many challenging issues such as site allocation for housing development including; open market; affordable; rented and holiday homes, provision of sustainable infrastructure and conserving our environment and heritage assets. The construction of Sizewell C will significantly add to these pressures. However, it also has the potential to provide longer term demographic and re-generation benefits for the future sustainability of our 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 quality of life for the local communities.

## **1.0 The Consultation Process (Q15)**

EDF Energy have failed to address in their consultation that due to the National Grid line availability at this point on the coast the communities around Sizewell have suffered a great deal of disruption and distress over many years from a series of Power Generation Projects, including two Nuclear Power Stations (Sizewell A & B), the Greater Gabbard and Galloper wind farms.

There appears to be no respite in the disruption to our communities and damage to our landscape with the prospect of the construction of Sizewell C Nuclear Power Station running in parallel with East Anglia ONE North, East Anglia TWO Offshore Wind Farms, National Grid Ventures, Nautilus and Eurolink projects and potential for the expansion of the Greater Gabbard and Galloper wind farms. These combined developments will be concentrated within in a few square miles of what is currently an Area of Outstanding Natural Beauty on the Heritage Coast and continue over many years.

## **2.0 Main Changes Through Consultation**

Aldringham-cum-Thorpe recognize that EDF Energy is moving towards firm proposals for the infrastructure that is needed to facilitate the construction and operation of Sizewell C Nuclear Power Station. However, some of the solutions proposed fail to address the fundamental concerns of the local communities and appear only to provide EDF Energy with the most expeditious means of building Sizewell C. In the following responses, we have given our views on each of the proposals and in some instances, we have indicated shortfalls and possible alternatives that would deliver a more acceptable solution.

## **3.0 Sizewell C Power Station**

### ***Sizewell C Proposals: Overall (Q1)***

The Sizewell Site is located on the shoreline of the Suffolk Coast Area of Outstanding 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. Therefore, it is essential for EDF Energy to treat this development as an exemplar in every respect, and take its responsibilities for the environment in which Sizewell sits seriously. We believe to date that EDF Energy have not satisfactorily demonstrated a willingness to do this.

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.

### ***Main Development Site: Overall (Q2)***

#### ***Character & Environment***

The following is by no means an exhaustive list of our concerns that we need to see a satisfactory resolution for before work commences.

- The impact on the sensitive and designated habitats, including marine habitats, which surrounding the main site is not yet fully understood and therefore, it is at present not possible to say how these will be protected, restored or improved. More research and assessment needs to be carried out and mitigation measures agreed before work commences.
- EDF Energy have introduced extremely tall pylons on the site. These cables should be laid underground as at all other British nuclear Station.
- Unsightly chimneys, again not seen on British nuclear Station, should be unobtrusively incorporated into the design.
- Visual impact must be minimised by sympathetic design to the standard applied to Sizewell B. Appropriate colour schemes, 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 or in fact why land outside the AONB cannot be utilized. EDF Energy should continue working to reduce the take up of land and, where possible, seek alternatives where there would be no impact on designated sites. See appendix A for a more integrated approach.
- 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 Energy must demonstrate how they intend to preserve and protect them as our future heritage.
- Noise, dust, 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.

### ***Water Management***

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 as all these have a great potential to dramatically change the character of the precious areas north of the site.

### ***Sea Defence***

The long term impact of moving the site platform nearer the shore line is of great concern, together with the design of EDF Energy defense terminations. All sea defences must be done in such a way that they do not disrupt the coastal processes and cause irreversible damage to the coastline to the north and south, resulting in significant deviation from the SMP predictions.

### ***Coastal Process***

Aldringham-cum-Thorpe Parish Council is concerned with the possible coastal impact of a Sizewell C project to the north and south of the site, and particularly south of the Thorpe Ness Point including the Thorpeness frontage.

Whilst Aldringham-cum-Thorpe Parish Council are pleased to see that the option of a large jetty has been removed we are concerned that a BLF is to be kept as a permanent feature. If this requires future dredging for occasional use during operation EDF Energy must be able to demonstrate that this will not have any impact on the coastal processes.

We do not believe that EDF Energy have sufficiently demonstrated that any of the work carried out on the foreshore, coastal margins and coast will not have a long-term impact on the fragile coastline to the north and south of the site.

### ***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.

### ***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.

### ***New Access Road and SSSI Crossing***

Aldringham-cum-Thorpe Parish Council's recognize the necessity for a new access road to the north of the site but our preference was for the SSSI crossing 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. There is very limited, if any, environmental impact information on the option chosen. We believe that a causeway will impede the flow of water and wildlife and has a larger footprint on the SSSI and should not have been the selected option.

### ***Managing Construction Materials***

Aldringham-cum-Thorpe Parish Council are pleased that EDF have rejected Pit 1 to the west of Eastbridge Lane but are disappointed that the remaining pits are still within the AONB. Appendix A offers an alternative solution by utilising the old Leiston Airfield site.

## **4.0 People and Economy (Q3)**

### ***Workforce***

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.

### ***Education, Skills and Employment***

We are encouraged that EDF Energy are committed to ensuring local people are able to access the jobs and benefits that Sizewell C will bring to this area. However, when Sizewell B was built, many trades people and staff of local companies were attracted by the opportunities offered at Sizewell. This created a lack of individuals in the area to take on the trade work or fill company vacancies. The effect this had on the local communities should not be underestimated and is a serious concern, which is difficult to mitigate against.

### ***Tourism***

We are pleased to see that EDF Energy have recognised that tourism is an important source of jobs and income in this area and are looking to provide a tourist fund to help support the industry. We expect EDF to work very closely with us in mitigating the impacts of this large development as tourism, which will continue to be a major industry contributing to the economy of this area.

EDF Energy proposals for a visitors centre to support their communications strategy is very welcome and should be developed in such a way as to provide a long term facility for the local communities and visitors alike. The visitors centre which was opened at the time of the Sizewell B construction proved to be very successful and remained as a very valuable resource for the community into the operational phase, but was unfortunately closed due to security and commercial issues. Location and provision of any new visitors centre should be planned such that it will not suffer a similar fate.

### ***Public Services and Community Facilities***

We are pleased to see that work is being done to understand the impact on healthcare, schools etc. but a significant contribution from EDF Energy is required to adequately offset the major impact of this large scale development, and workforce, will have on the local community. The provision of a simple community fund will not be adequate to mitigate all of the impacts.

## **5.0 Accommodation and Transport**

### ***Accommodation: Overall Strategy (Q 4 &5)***

The proposed accommodation strategy relies heavily on a large temporary accommodation campus for 2,400 workers at a single location adjacent to the construction site. Although additional work has been done to reduce the visual impacts of this development, we still consider this to be an insufficiently thought through solution, designed to minimise commuter impacts, rather than satisfy existing and future social needs. 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. (See Appendix A) 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 following construction, for workers during outages for example. Some smaller groups of accommodations 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.

### ***Transport Strategy (Q 6 to 12)***

EDF Energy recognise the transport and traffic issues are of major concern to local people. EDF Energy have now discounted, to the disappointment of many, the sea option, leaving the two options of Land and rail, both of which have their own issues and will require significant input from EDF Energy to make either acceptable to the local communities.

It is a fact of our current lifestyles that roads provide the means by which the majority of our business and domestic journeys are made. Believing a rail lead strategy will in some way have a significant impact on changing this is not realistic. Therefore, a Road-led Strategy is the only viable option for most journeys to the site, with bulk materials including aggregate, cement and steel being delivered by rail.

### ***Rail-led Strategy (Q8)***

Although at first the rail option appears to be the most attractive, it will only take a proportion of the HGVs off the road, the majority of journeys will still be made by road. we also believe that there are too many significant issues to be resolved including:

- The closure of numerous Level crossings will have a significant impact, causing major disruption to local communities
- The closure of Footpaths will also be a major concern for both local communities and tourists
- The existing rail services are, at best, frail. Increasing the volumes, and weight on this stretch of railway could cause significant disruption to passenger service
- The potential use of trains during the night will be a major concern for the population who live very close to what is currently a lightly used track that is unused from 11:00pm
- Significant work could be done on these tracks that will not offer any substantial legacy when development has ended.
- There is a big dependency on third parties to deliver the infrastructure required to support this option.
- Temporary closure / new crossing at Buckleswood Road

Work should continue on identifying how the capacity of the local rail system can be maximized for the transport of bulk materials without having to implement the disruptive measures identified above.

However, there is a potential for 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.

### ***Theberton bypass***

Aldringham-cum-Thorpe Parish Council believe that although there is some benefit from a new B1122 Theberton Bypass it would not be required with a road led strategy.



### ***Road-led Strategy (Q11)***

Aldringham-cum-Thorpe Parish Council believe that a road-led strategy should be predicated on a new link road being provided between the A12 and the B1122 east of Theberton. Although this strategy will have major impacts, it also has the potential to deliver maximum benefits in the short and long term.

### ***Sizewell Link Road***

Aldringham-cum-Thorpe Parish Council are pleased to see that EDF Energy accept that a new road to the site from the A12 is required. However, we believe that proposed solution which runs parallel with the B1122 and has a junction with the A12 just south of Yoxford is too far north to be used by the majority of the site traffic which comes from the south, and will therefore not provide the required relief to the existing road network or any significant legacy.

Aldringham-cum-Thorpe Parish Council has always believed that the previously proposed D2/W link road which would take all of the traffic from the north and south, has always been the best and only plausible solution. This route would alleviate the pressure on both the B1122 from the north and the B1353 from the south, as well as providing enormous legacy benefit to Leiston and the surrounding area giving a much needed solution to the already over crowded roads. Appendix A offers a integrated solution incorporating this route.

### ***Freight Management Facility***

We believe that the Freight Management Facility at Ipswich is a necessary requirement for a road led strategy. However, as the sites have no direct impact on Aldringham-cum-Thorpe the selection and siting should be largely a matter for the local parishes, we do believe as previously stated legacy value should be an important factor when making the decision.

### ***Park and Ride (Q12)***

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 (potholes) for which the local communities should be compensated. However, Appendix A offers a integrated solution which would negate the requirement for these sites.

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.

### ***A12 two-villages bypass (Q13)***

Aldringham-cum-Thorpe Parish Council require the 4-village bypass proposal to be adopted and supports the proposal that this should be achieved as a jointly funded scheme with government bodies. This is an essential requirement for either a rail-led or road-led strategy, delivering significant long term legacy benefit for the wider community, including the Sizewell Stations.

### ***Road Improvements (Q14)***

#### ***Yoxford / B1122 Junction***

Aldringham-cum-Thorpe Parish Council are pleased to see that improvements to this junction have been retained and will be in the form of a roundabout. However, if the proposal in Appendix A is adopted this may not be necessary.

#### ***A12/A1049 Friday Street and A1049/A1069 South of Knodishall***

Both these road improvements are necessary for both rail-led or a road-led Strategies. However, with a new link road D2/W, these may not be required.

### ***Summary***

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 our core beliefs of achieving maximum benefit and legacy whilst minimising the significant impacts.

Aldringham-cum-Thorpe Parish Council believe that the integrated approach outlined in appendix A below, makes many of the options discussed above redundant and delivers all that is required in a much more integrated way.

Aldringham-cum-Thorpe Parish Council also believe that Central Government and all the energy companies working in this area to deliver their own projects, should work in a collaborative way to address the major infrastructure issues we all face. By working in this way, it will be possible to deliver the best solutions for all.

## **Appendix A**

### **An integrated approach to Transport, Accommodation and Laydown for Sizewell C**

At the time of the consultation for Sizewell B there was a proposal for a new link road direct from the A12 to the site. The proposal identified four alternative routes. We believe consideration should be given to looking at the D2 proposal, specifically a route that would cross the old Leiston airfield. If such a route was chosen together with an appropriate rail extension, which also crosses the old airfield, an opportunity would be presented which has the potential to resolve many of the other infrastructure issues, including:

Accommodation campus(es) could be sited along the route of the new road or on the old airfield site itself.

Park and ride facilities could also be sited along the new road or on the old airfield site.

Laydown and temporary construction areas could be located on the old airfield thus reducing the impact on the AONB.

Stockpiling area for storage of construction materials.

The rail link could terminate on the airfield or be extended into the site.

There could be a private dedicated secure road link from the airfield onto the site, via a B1122 underpass. This could enable 'in processing' to be carried out remote from site.

Local parking could be accommodated on the old airfield.

This option would remove the need for many of the proposed road improvements, both park and ride facilities and would require only one junction with the A12.

The air field has also the potential to provide the other energy delivery projects a common location to have similar facilities.

Potential for Legacy Use:

If we are to be a centre for energy supply industries then a single sustainable area is the best solution to servicing all their requirements.

Accommodation could be retained by EDF Energy for use by workers during outages.

The site could also be developed to support local industry and/or become an energy technology park, with an historic link to the age of steam via Leiston's long association with steam engine production.

An energy academy could be developed on the site.

The new road and rail links would support growth on both the old airfield site and the Leiston area in general.