

WESTLETON PARISH COUNCIL



The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

3 March 2020

Dear Sir/Madam

Re: EDF's Sizewell C nuclear power station proposal

I am writing on behalf of Westleton Parish Council (WPC).

During the pre-application process for EDF's proposed Sizewell C nuclear power station, the WPC has consistently noted its concerns in each consultation stage about the lack of environmental impact detail and evidence provided by EDF and hence has questioned EDF's basis for the options at each stage of the consultation and overall proposal. Our concerns have focussed on the projected vehicle traffic numbers, detail regarding the planned spoil heaps and borrow pits, impact of lighting on the night sky/pollution and projections concerning coastal erosion and flooding.

While WPC is concerned about the overall environmental impact of the Sizewell C build and the long-term presence of the new power station on the local environment, we are particularly conscious of the impact of increased traffic through the village during the build and the impact on tourism and on the housing market as a consequence of the accommodation needs of the workforce. We now understand that the information that EDF has provided at each consultation stage on the anticipated numbers of workers, and their accommodation, may be open to question. Experience at Hinckley C suggests that the higher projections of 7,900 workers for Sizewell C flagged at the Stage 3 consultation as peak "worse-case" levels may be closer to the reality, yet EDF's Scoping Report submissions to PINS (2014 and 2019) are based on the lower projected workforce of 5,600. This not only raises questions of accommodation for and impacts of these higher numbers in the region, but more pertinently in the context of this letter, the appropriateness of EDF's submissions to all parties for the consultation and application processes. This uplift in worker numbers will also clearly impact on the transport impacts. WPC has previously highlighted our dissatisfaction with EDF's traffic flow projections through the village (see annexed stage 3 and 4 consultation responses), but

these will now need to be revised to account for the likely higher projected workforce numbers and specifically, traffic through the village which will increase.

These issues compound the fact that the environmental studies that were proposed over six years ago during the Stage 1 consultation, and even earlier in EDF's Scoping Report, have still not been made available via the consultation process. While baseline information material and surveys have been referred to in the Preliminary Environmental Information documents, these have not been made available during the consultations. This lack of evidence within the consultation process does not meet the requirements of the Planning Act 2008 nor the expectations of the Community Consultation, and we believe that the detail provided in the preliminary environmental information has been insufficient to comply with the guidance on conduct of a National Strategic Infrastructure Project (NSIP).

Consequently, we believe that EDF should revise its proposal in accordance with the full and revised data and undertake a further consultation with statutory consultees and the public to ensure the process has been appropriate and transparent. This must happen prior to the acceptance of any DCO application.

Yours faithfully

Ian Haines

Westleton Parish Council Clerk

Copies to:

EDF Energy - Sizewell C

[REDACTED] Suffolk County Council
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ANNEX

EDF Energy Sizewell C 3rd Stage Consultation – Response from Westleton Parish Council

Overall Comment

It is the belief of Westleton Parish Council (WPC) that the development of the Sizewell C as proposed at this final stage 3 public consultation will have a negative impact on the local area. This part of the Suffolk Coast is an Area of Outstanding Natural Beauty and tourism is the main industry. Every effort must be made to reduce the impact on this, and on the quality of life of the people who have chosen to live here. The response of the public to stage 1 public consultation in 2012 and the later stage 2 has been a request for more information on which to make judgement, particularly the effect on the ecology of the area and the impact on the surrounding area due to a massive increase in traffic. There has been constant opposition to the proposed transport arrangements and the accommodation campus sited adjacent to the area of AOND. Although EDF have at this late stage responded to transport concerns, to a degree, they have chosen to ignore the overwhelming opposition to the concept and design of the campus that have not been properly mitigated by the latest EDF proposals.

Environment

There is a lack of information especially concerning the spoil heaps and the borrow pits. Visually and environmentally this will have a huge impact on the surrounding area. Stage 3 has introduced further detriment to the visual impact as the earlier proposed underground power cables will now be carried on towers the height of the turbine hall. The area around Sizewell is exposed to coastal erosion and flooding. More information is needed as to how EDF will allow for these natural processes without moving the problem further along the coast and how they can guarantee long term site security.

Westleton Common is a Dark Sky Discovery site and is used by local astronomical societies. The consultation document offers low impact lighting as a mitigation feature but it is unlikely that this would allow the continued use of the site for astronomical observations. Therefore, for at least the period of construction, if not permanently, Westleton would lose one its unique characteristics.

Transport

For many residents of the area their main concern regarding the building of Sizewell C is the impact increased road traffic will have on their daily lives during the 10 – 12 years of construction. For this reason, the abandonment of the initial marine-led strategy and the limiting of rail movements, with a consequential increase road usage, has raised so much ire.

Westleton is situated on the B1125, a road that provides a convenient cut through for traffic coming or going from the North to Sizewell. Residents of the village raised this problem at both stage 1 and 2 consultations and were assured that this would be

addressed at stage 3, with at one time a suggestion that number plate recognition could possibly be used. Downloads from the Vehicle Activated System (VAS) purchased by WPC have been supplied to the Sizewell team showing a constant average of 17.4% of all traffic passing the playing field traveling at 35mph in the 30mph zone. We now come to stage 3 and the only information we find is a projected increase of 22% due to Sizewell traffic.

No information has been given on how the assumed natural increase of 23% in traffic was determined. (The Westleton VAS shows no evidence of natural increase from May 2015), or the determination of 650 a day due to Sizewell C traffic. The percentage increase of an extra 650/day on the EDF current 2,200 is 30%. It appears that EDF have no plans to address this increase in traffic through this attractive holiday village with a bottle neck at the centre.

Further afield WPC are concerned regarding the positioning of the Darsham park and ride entrance. Although in theory WPC support the park and ride as it would, hopefully, draw traffic away from Westleton, but we see the closeness to the rail level crossing and the A12/ B1122 roundabout leading to possible gridlocked traffic when the rail barrier closes at time of high traffic flow. It is extremely disappointing to learn that there are now no plans to retain a residual parking facility for the Darsham rail station.

We are pleased that EDF have at last accepted that the B1122 from Yoxford through Theberton is not suitable as the main road route to the Sizewell C site.

There has obviously been detailed investigation leading to the EDF choice of the Link Road compared with the variations on the preferred choice of Suffolk County Council, D2, going back to the 1980's. There are pros and cons on the variations of D2 (now designated W), but we cannot accept the EDF statement in 10.6.4 that states.

For this reason, and in accordance with the conclusions of EDF Energy's high-level appraisal outlined in section 10.5, EDF Energy does not consider route D2 (W variants) to be a viable alternative to its preferred route, Route Z South.

The W route is;

- (a) Far less damaging to local communities and environment.
- (b) Far shorter route to site in that it eliminates the need to bring traffic from the south, projected to be far greater than that from the North, to Yoxford.
- (c) Far less impact on houses
- (d) Of long-term benefit/legacy to Leiston. The proposed Link road runs closely parallel with the B1125 and will be largely redundant on completion of the build.

Temporary Accommodation

Although stage 3 proposal shows a reduction in the maximum height of 5 to 4 stories EDF have been intransigent in resisting opposition to the 2400 worker campus and calls to disperse this in local urban areas with legacy value on completion of construction. The campus is on a green field site close to the hamlet Eastbridge with a population of some 50 residents. Not only is the visual, environmental and social impact unimaginable for Eastbridge residents, a village of around 50 people, and the nearby Theberton with 279

residents. WPC supports splitting the accommodation and building permanent homes that can be utilised by local Councils in the future.

People and Economy

The influx of workers coming to live for some 10 to 12 years in the local area around the Sizewell construction will have a powerful negative impact on services. EDF need to give clearer details on how it intends to mitigate the strain placed on local schools, policing and healthcare whilst construction takes place. Whilst long term employment opportunities are welcome, EDF should ensure that training and apprenticeships are providing to ensure that these opportunities can be kept in the local area.

Conclusion

As the understanding of the severity of the impact on the very special part of Suffolk has become clearer, and the momentous increase in other forms of renewable energy, WPC has come to believe that EDF has been unable to demonstrate that the benefits of this proposal to the local area and the county as a whole are not justified by the devastating impact to this area. WPC also makes claim to the fact that EDF have failed to produce sufficient detailed data required to justify many of their decisions.

March 2019

EDF Energy Sizewell C 4th Stage Consultation - Response from Westleton Parish Council

Westleton Parish Council (WPC) has stated in each of its responses to the previous consultations that it is concerned that the development of Sizewell C and D will be the cause of significant social, economic and environmental damage to the local area. Accordingly, WPC is opposed to the development of Sizewell C and D. WPC response to the Stage 3 Consultation is annexed to this submission. It explains WPC's concerns regarding:

- the scale of the site and the damage it will cause to the Area of Natural Beauty, the Sites of Scientific Interest and the RSPB Bird Reserve at Minsmere;
- the significantly increased traffic levels on all roads in both the immediate and wider area around Sizewell and specifically in Westleton;
- the negative impact that the build will have on the tourist industry which is a major contributor to the local economy;
- the scale of the accommodation campus;
- EDF's rejection of the option to work with the Council to develop permanent and legacy housing to accommodate the influx of workers; and
- the pressures the influx of workers will place on already stretched local services.

The changes proposed in this Stage 4 consultation do not change WPC's view. If anything, our concerns are heightened as EDF approach's to the build has evolved from one seeking to find means to minimise the use of road transport to one which now makes a road-led approach most likely; and because with this consultation, EDF has

shown that it is ignoring the views of the local communities as it is offering little to mitigate any of the previously mentioned concerns.

For this 4th Stage consultation, WPC wishes to emphasise 2 points:

- **B1125 at Westleton:** the traffic flow increases for the B1125 through Westleton remain projected as an additional 650 vehicles per day. The Stage 4 consultation now acknowledges that:

“In some locations there is a large proportionate increase in traffic compared with the reference case (without Sizewell C), such as ... the B1125 (locations F and L), however these increases are from low existing levels and the road capacity would not be exceeded.”

We agree that 650 additional vehicles is a large increase in traffic; but to state that the traffic on the B1125 at Westleton is currently at a low level is inaccurate: the Department for Transport's 2018 Statistical Release notes that average daily traffic flows on rural minor roads (not A roads) is 1,000 per day. This means that the B1125 traffic flow through Westleton is already significantly above the national average for minor rural roads as the consultation document calculates 2015 flows at 2,400 vehicles daily. This route also already suffers from excessive speeding (see Transport section in the Appendix below) and so the addition of the projected Sizewell traffic will not only further increase the traffic flow, but will most likely exacerbate the existing speeding problem. Furthermore, the traffic flow figures used in the Stage 3 and 4 Consultation documents do not account for the tourist traffic during the summer months which raises daily vehicle averages on the B1125 to 3,500. The total summer traffic flow projections for the B1125 in Westleton will therefore exceed 4,000 per day. WPC calls on EDF to recognise these facts in its deliberations.

- **The D2/W relief road:** EDF must recognise that the D2/W relief road is the only solution which might mitigate the impact of the Sizewell C and D HGV, bus and worker traffic as it will avoid substantial increases in traffic concentrations in the roads servicing and surrounding the Sizewell area. It would also be used by the other energy projects planned for the area which will require significant infrastructure development. Importantly, it would also leave a valuable legacy from the project as well as providing a suitable and necessary emergency access route to/from the completed power station. This positive legacy impact would be in contrast to the plans for the proposed new Link Road, which EDF is now suggesting may be removed after the build.

In conclusion WPC's position remains unchanged from that provided at the Stage 3 Consultation: WPC does not believe that EDF has demonstrated that the projected benefits of Sizewell C and D to the local area (nor to the county as a whole) are justified given the traffic impact on Westleton and the devastating social, economic and environmental impacts that the build will have on the local area.

September 2019