



East Suffolk

This submission to the Stage 3 Pre-Application Consultation for Sizewell C is made on behalf of East Suffolk Liberal Democrats.

Question 1: What are your views on EDF Energy's proposals to build a new nuclear power station, Sizewell C, and associated development?

Suffolk Coastal Liberal Democrats – now East Suffolk Liberal Democrats (ESLD) – made a submission to the Stage 2 Consultation. At that time, we did not comment on the need for a new nuclear power station at Sizewell, limiting our comments to the proposals made by EDF Energy in its consultation document in case consent for Sizewell C is granted.

While recognising that the decision to proceed is a matter for the Secretary of State, we feel it is appropriate now to make clear our broad objection to the proposal to build a new nuclear power station at Sizewell:

- Nuclear power is not “green” energy:
 - The construction of Sizewell C will require millions of tonnes of CO₂ generating concrete and millions of HGV-traffic-miles; it cannot therefore “make a major contribution to the nation’s low-carbon energy needs” as stated in the consultation paper; and:
 - The legacy of Sizewell C will be dangerous waste left for future generations to manage.
- The CO₂ generated in the construction of a nuclear power plant contributes to global warming which is the cause of rising sea levels. Nuclear power stations need to be located by the sea, but are then vulnerable to sea levels rising as a consequence of global warming. We do not think that this concern has been fully considered at Sizewell where the risk of sea-level rise is compounded by an eroding coastline.
- The need for nuclear power in the electricity generating mix is diminishing as the generation of renewable power (wind, solar, etc) is increasing. Sizewell C is projected to take 10-12 years to construct by which time there may be no need for new nuclear generating capacity.
- The cost for nuclear power is increasing while the cost for renewable power generation is decreasing: already the strike price for electricity generated at Hinckley Point C is significantly higher than the strike price of renewable power – and the difference between the strike prices is likely to increase during the period of construction of Sizewell C. The cost of the power generated by Sizewell C will therefore be unnecessarily high and that cost will be borne by consumers.
- The new consultation document claims that EDF Energy aims to “...limit any adverse effects on the environment and on local communities...”. This is simply not possible as the construction and operation of a new nuclear power station at Sizewell will have an extremely detrimental impact on the Suffolk’s coastal area and its communities as it:

- Will bring thousands of workers to an area which is already experiencing pressures on housing and services. The accommodation strategy is based on housing 2,400 workers in temporary accommodation in 4-storey buildings in a rural setting and placing 400 caravan sites next to a town whose facilities and services are designed only to meet the needs of the 5,600 residents;
- Will require a very significant increase of HGV, bus, LGV and car traffic across the region and beyond – and notably on single carriageway A and B roads which pass through villages and around the site; and it:
- Will require extensive noisy, dusty and unsightly development in an area where a large part of the economy is dependent on the tourism attracted by the beautiful coastal environment including the Minsmere RSPB nature reserve – i.e. the build will be at the expense of the region’s £640¹ million tourist economy.

The proposed development and operation of the site is therefore not only inappropriate and not necessary, but it will also be the cause of extreme negative impacts on the local communities, local infrastructure, local services and on the environment. These will in no way be compensated for by the suggested employment/economic benefits. Moreover:

- the consultation document makes clear that it expects two-thirds of the 5,600 employees (or three-quarters of the possible peak projection of 7,900 employees) to be from outside the area;
- While the schools and apprenticeship programmes are welcome, reports are emerging that EDF Energy is now considering using the Hinckley Point C supply chain - including workers who were trained under that apprenticeship scheme - in order to reduce costs. If this is the case it will be to the detriment of apprenticeships/job creation in the local community;
- nuclear power stations do not need high staffing levels (900 for Sizewell C) so the long-term employment benefits are not significant; and:
- the Scottish Power off-shore wind-farms are already placing environmental demands on the area because of the required transmitters and substations construction which will put more pressure on the local roads and result in more large unsightly infrastructures.

Given all the above, it is difficult to see how the construction and operation of Sizewell C as proposed would meet the economic, social and environmental objectives of the National Planning Policy framework; NPS-EN1 and EN6, and complement the Local Plan under development by the District Council.

In conclusion, ESLD do not believe that Sizewell C should be built: its construction will be much more expensive and much more environmentally damaging than alternative and renewable energy generation, consumers will have to bear the unnecessary additional costs and future generations will be left to deal with the nuclear waste. There may be economic benefits, but they will not compensate for the environmental and social costs of the construction and quite likely will not compensate for the damage done to the tourist economy which is so important to the area.

We said in our previous submission that EDF Energy should make proposals that mitigate the construction impact and which leave a positive long-term economic and social legacy. We suggested how this might be achieved: by coordinating with local authorities and with national Government to allow the Project to complement local planning, development and transport plans and by aligning

¹ <https://www.eastsuffolk.gov.uk/news/suffolk-coast-dmo-conference-goes-from-strength-to-strength/>

the infrastructure needs of the Project with the Government's Industrial Strategy. EDF Energy have not taken any of those suggestions on board. We reiterate them in this submission in case the Secretary of State does grant consent for Sizewell C, alongside comment on the changes proposed to the previous plan.

Question 2: What are your views on our proposals for the main development site?

ESLD note that EDF Energy has declined to ask for views on the *environmental* impact of the main development site. We also note that EDF Energy is only able to provide *preliminary* environment information to support the new proposals – and that work on the Environmental Impact Assessment is ongoing. This means that we cannot offer a reasoned opinion on significant components of the proposal. EDF Energy must complete and present its Environmental Impact Assessment of these proposals to interested parties before it submits its application to Government in a further consultation stage. Furthermore, we expect the Environmental Impact Assessment to take into consideration the parallel infrastructure projects for the East Anglia One, Two and Three windfarms as these major infrastructure projects cannot be viewed in isolation.

However, in the absence of the Environmental Impact Assessment, ESLD can state with confidence that the environmental impacts of building a new nuclear power station in an Area of Outstanding Natural Beauty, that neighbours the RSPB Minsmere Reserve, cuts across a Site of Special Scientific Interest (SSSI) and is sited on the beautiful but receding Suffolk Heritage Coast can only be negative. The site will be a noisy, dusty, and an eyesore: the accommodation blocks will be the tallest buildings for miles which will themselves seem small in comparison to the anticipated spoil heaps. The proposed causeway over the SSSI was the cheapest option proposed at the Stage 2 Consultation and which will have the most detrimental impact on the on the flora, and in particular the fauna, of the area – and there is real concern that the build will impact ground water levels with consequences extending far beyond the site. And, finally, the decision not to build a jetty means *increased use* of road and rail and the introduction of the pylons on the site will compound all of the other negative environmental and visual impacts of the completed powerplant.

ESLD therefore believes that not only is the Project inappropriate for this area, but that the changes made to the proposal since the Stage 2 Consultation worsen the environmental impacts.

Question 3: Do you have any comments on our people and economy proposals, including our approach to education, training, local supply chain opportunities, tourism, and managing community and social impacts of Sizewell C?

ESLD recognise that the construction and operation of a new nuclear power station at Sizewell will create jobs and deliver investment in the area. But the starting point of a response to this question must be to consider these anticipated benefits against any negative impacts the Project will have – not only on the environment – but also on communities and infrastructure, on local services (healthcare, policing, schools), on the housing market, on the local economy and on the £640 million tourist industry. ESLD remain concerned that:

- As two-thirds of the 5,600 employees (or three-quarters of the possible peak projection of 7,900 employees) are expected to be from outside the area, the potential benefits for the local economy cannot not be fully realised;
- Conversely, any use of a local workforce might be the expense of other local needs – hence putting pressure on supply and pricing in the local economy;
- An influx of such a large number of workers (plus families in some cases) will put undue pressures on local resources and facilities, will challenge social cohesion in Leiston and will impact local living expenses because of rental and house price inflation – we understand that there is evidence that the Hinckley Point C construction has resulted in local private landlords accommodating site workers at the expense of locals;
- The full benefits for school leavers will not be as expected because the Hinckley Point C supply chain is expected to be used in order to reduce costs; and:
- The 10/12-year Project itself will impact negatively on the existing £640 million tourist economy.

Therefore, if the Project is to proceed, to minimise negative social and economic impacts, EDF Energy must:

- Commit to further resources to ensure that the necessary levels of provision of healthcare, schooling and policing for residents of Leiston and the surrounding villages;
- Implement fully its apprenticeship programme via local schools and colleges;
- Implement the design changes recommended by local interested parties in order to minimise any negative social impacts and economic impacts on the labour market, local housing market and tourist industry.

Question 4: What are your views on our overall accommodation strategy?

Question 5: please tell us your views on our temporary accommodation proposals?

ESLD stated in our Stage 2 Consultation response that we do not support the development of a large accommodation campus. Our reasoning has not changed: it is completely unacceptable to place a campus housing 2,400 people next to villages of Theberton and Eastbridge whose populations total 400 - the noise, traffic and air pollution will be devastating to the health and quality of life of those communities over the 10-12 years of the build.

Equally, it is completely inappropriate to place what is in effect a town half the size again of Leiston on its boundary. It is likely that some of the campus residents will want to use the town's facilities – this will simply put pressure on services and facilities which are already under pressure. Of particular concern would be pressure on policing and the pressures on health services and schooling if workers bring families (see above Q3). Furthermore, while we welcome the incorporation of a dedicated caravan site to reduce the need for workers to use local tourist caravan rental provision, the addition of an additional 600 workers living so close to Leiston will only compound the anticipated problems for local facilities, resources and community.

The Stage 3 Consultation document notes that EDF Energy would build outdoor sports pitches next to the town's leisure centre. This would be a welcome facility and legacy. A gym is proposed to be included in the accommodation campus, but the consultation document suggests that workers may also choose to use the local facilities (presumably with the gym, pool and squash courts in mind). If

so, this would be to the detriment of the centre's regular users which is already well used and is expected to become more popular once the current refurbishment is completed.

If the Project is to proceed, EDF Energy must rethink its accommodation strategy: an appropriate approach would be to use a much smaller accommodation campus and to in parallel cooperate with East Suffolk District Council, the County Council and national Government to help reverse the historic underinvestment in local housing infrastructure and services. It must in particular address the lack of affordable housing in the towns and villages, and should complement the Suffolk Coastal District Council's recent decision on development (the Local Plan) and utilise the Government's £5 billion Housing Infrastructure Fund. An even distribution of workers in communities across the area will avoid the impact of the increase in population being borne by one town and its community, and would contribute to the proportionate and structured growth of East Suffolk communities. The output should be new housing for the workers, designed as a component of the District Council's Local Plan and which will provide a positive housing legacy for the region.

Question 6: What are your views on a rail led versus a road led strategy?

ESLD are disappointed that EDF Energy seems to have ignored the majority of comments made to the Stage 2 Consultation proposals. ESLD's views remain the same: if the Project is to go ahead the impact on the local communities of the transport of material and workers to and from the site must be minimised. Our Stage 2 Consultation response accordingly advocated a focus on the use of marine and rail transport. EDF Energy have discounted the use of marine transport because of "damage to the marine environment". On this basis, EDF Energy should cancel the Project on account of the damage that it will do to the environment generally. However, it has not and if the Project is approved by the Government ESLD views are that:

- the only acceptable solution is for a rail led option with road transport to the site being via the so-called D2 relief road as detailed by the D2/B1122 AECOM study² (or the proposed W route), and a 4-village bypass as detailed by the AECOM study³ on the A12. The relief road must be constructed before the start of the transport of materials and work begins to avoid use of the B1122 in the early years of the Project as has been proposed in the Stage 3 Consultation. All of these actions are essential to minimise the use of road transport and minimise the impact of road transport on local communities.
- The traffic generated by the Project will be of a scale greater than suggested in the consultation document. The traffic modelling is questionable (for example the current traffic figures used as the basis for Melton projections are wrong) and some of the modelling of flows do not make a distinction between cars, HGV and busses (table 6.2) making a mockery of the figures as their impacts in terms of road space/traffic weight, noise and pollution are very different; and none of the calculations seem to realistically account for the personal transport of the workers living on the accommodation campus and the caravan site. Moreover, the experience at Hinckley Point C is that the traffic projections have proved to have been underestimated and we understand that EDF Energy have already had to call for extra traffic movements.

² Sizewell C, Route D2 and B1122 Study – December 2014

³ A12 Four Villages Study – October 2014

- The D2 (or W route) must replace the Sizewell link road and the Theberton bypass because the route is much farther way from residential areas than any of the other options, because it goes directly to the site and because it can be linked to the 4-village bypass. It would also benefit the other energy infrastructure projects and would be a valuable legacy for Saxmundham and Leiston. The various options in the Stage 3 Consultation are not acceptable:
- Road-led:
 - for 2 years there would be 600+ HGVs, hundreds of LGVs and hundreds of busses using the B1122 every day causing misery for the residents of Yoxford, Middleton and Theberton;
 - The Sizewell link road: would be used by 1500 HGVs, 600+ busses and LGV and other traffic daily - but it passes too close to the communities it is intended to avoid thereby negating its intended benefits; and
 - the final stretch of B1122 from Theberton to Leiston will be too congested to allow timely emergency service response to the local communities and is not suitable as an evacuation route from the site.
- Rail-led:
 - We are concerned that EDF Energy cannot even confirm that the rail-led option is even possible;
 - EDF Energy must ensure that it is possible and together with Network Rail it must make the line dual-track between Westerfield and Saxmundham – this would require fewer points and facilitate flow. It must also ensure that the trains avoid times when the roads are most busy and avoid journeys at night as the line passes through numerous residential areas (Westerfield, Woodbridge, Melton, Saxmundham). Of particular concern is the noise at level crossings as the noise of the crossing sirens travels far – especially at night.
 - We are concerned about traffic congestion at crossings (particularly at the Melton crossing which also needs substantial improvement to make more appropriate for HGV use) when the barrier is closed to allow long, slow trains to pass. This congestion will be compounded by the pollution it causes and the knock-on impacts on local traffic flows.
 - The proposal does not include the Sizewell Link road - leaving Yoxford and Middleton to suffer the effects of 900 HGVs plus the bus and LGV traffic daily. This is completely unacceptable.
- More generally, under all options – including the D2 relief Road:
 - there is very real concern the high traffic volumes on the A12 and all local routes will severely impact on emergency service response times. Moreover, the incident management system shows the high concern about congestion in the event of just one accident. While a system is proposed to manage the HGV flows this would do nothing to avoid the problems for local traffic and emergency services response. The 4-village bypass would reduce but not remove these concerns;
 - The A12 has single-carriageway pinch points on each side of Melton — at Seckford Hall, and at Bredfield – these need to be converted to dual carriageway because even now these roads experience significant congestion. Dualling these stretches of road would help traffic flows and avoid “rat-running” through villages to avoid the increased congestion caused by the Project’s traffic.

In conclusion, ESLD’s view is that the environmental, community and safety impacts on the region of the significant increase in traffic over the 10-12 year period will be hugely detrimental to the region

and will not compensate for any economic benefits. However, if the Project goes ahead, it must be in a manner which minimises these detrimental impacts: the only acceptable solutions are those outlined above – i.e. in the absence of the marine-led option, it must be a rail-led operation in conjunction with the construction of D2 relief road, the 4-village bypass and the A12 improvements - all to have been completed and ready for use before the start of the build.

Question 7: Rail - what are your views on the proposal for a reconfiguration of the Sizewell Halt terminal versus a new rail siding?

ESLD suggest that EDF Energy construct a new rail siding as it would allow more efficient discharge of materials and have a reduced impact on King George's Avenue.

Question 8: Rail - what are your views on the proposal for a closure of the Buckleswood Road versus a new level crossing?

ESLD suggest that EDF Energy build a new level crossing in order to minimise impacts on local residents and traffic.

Question 9: Rail – Please tell us your views on our Saxmundham to Leiston level crossings proposals

ESLD maintain that as with all other aspects of the Project, the approach taken must be designed to minimise impacts on residents.

Question 10: Rail – Please tell us your views on our East Suffolk line level crossings proposals

ESLD maintain that as with all other aspects of the Project, the approach taken must be designed to minimise impacts on residents whilst maximising safety – in many cases (and in particular in Melton) this must mean a significant redesign of the rail/road crossing. In the case of pedestrian crossings, we note that in most cases EDF Energy is proposing to alter radically commonly-used footpaths. This is not acceptable and instead footbridges must be constructed to maintain existing footpaths.

Question 11a: Rail – Please explain your views on the 9.9-hectare site close to the A12/A14 Seven hills Junction

Question 11b: Rail – Please explain your views on the 9-hectare site at Innocence Farm

ESLD maintain that as with all other aspects of the Project, the approach taken must be designed to minimise impacts on the local area – we offer no view as to which site is more appropriate. However, we do note that EDF Energy is not proposing to build a Freight Management Facility under the rail-led operation. This is not acceptable as the road transport volumes will not be reduced significantly under the rail-led operation. A Freight Management Facility must therefore also be a component of the rail-led operation.

Question 12a: Rail – Please explain your views on the Darsham park and ride

ESLD note that some of the concerns raised during the Stage 2 Consultation have been addressed, but light, noise and air pollution, congestion and safety concerns remain. Again, this forms a part of our reasoning against the Project as a whole. However, if the Project is to go ahead, a park and ride facility is necessary and the proposed site is the least-worst of all options. However, we note that the potential for a legacy benefit to the rail station in the form of additional parking has been removed. We think this legacy should be reinstated – EDF Energy must assess future parking needs for the Darsham Station and then convert the park and ride site to an appropriately sized car park whilst returning the remainder of the land to its former environmental habitat.

Question 12b: Rail – Please explain your views on the Wickham Market park and ride

As above: light, noise, air pollution, congestion and safety concerns remain. Again, this forms a part of our reasoning against the Project as a whole. Additionally, ESLD are concerned that:

- The proposed site will have a significant impact upon the lives of residents and businesses as a consequence of the inevitably additional traffic which will use the very busy and accident-prone B1116 route from Framlingham via Parham and through the Street at Hacheston;
- Northbound A12 traffic may try to access the park and ride via the B1438 going through the centre of Wickham Market - deterrent signage on the A12 may be necessary to avoid this possibility as Wickham Market is at all times a difficult route for all traffic, with significant pinch-points and on-street parking almost throughout the High Street. It is rarely possible for motorists let alone larger commercial vehicle to travel this route uninterrupted;
- Removing local residents' vehicles from the High Street would unreasonably impact a significant number of residents who have no alternative off-street parking; whilst the businesses along the route might welcome the potential additional footfall, encouraging large vehicles to travel this route will deter visitors and regular shoppers because of the congestion and additional demands upon existing parking – and to the extreme detriment of local businesses;
- The proposal to avoid the High Street and mitigate increased traffic from the west with minor improvements to the roads is unrealistic – the route proposed via the 18 century single lane, brick Glevering Bridge to the B1116 even with road improvements is not suitable for projected increased traffic.

Question 13: Do you have any comments on our proposal for a bypass of Farnham and Stratford St Andrew?

ESLD welcome the proposal to bypass Farnham and Stratford St Andrew, but as noted in Q1 believe that the four villages on the A12 need to be bypassed to mitigate the increased traffic. It is difficult to understand the logic of offering a solution to minimise the impacts of the increased traffic to these two villages without offering the same to Little Glenham and Marlesford.

Question 14: Please provide comments on the road improvements to:

A 140/B1078 West of Coddendam

B1078/B1079 east of Easton and Otley Colege

A12/B1119 at Saxmundham

A 1094/B1069 South of Knodishall

A12/1094 Friday Street, north of Farnham

A12/A144 south of Bramfield

ESLD maintain that as with all other aspects of the Project, road improvements must be undertaken wherever necessary and with the explicit objective to minimise impacts on residents whilst ensuring safety that is maximised.

Question 15: Please let us know if you have any comments about the consultation process

ESLD believe that:

- It is unacceptable that only preliminary environmental information has been provided at this late stage in the process - EDF Energy must complete and present its Environmental Impact Assessment of these proposals to interested parties in a further consultation stage before it submits its application to Government;
- This consultation should have taken account of the other energy infrastructure projects underway in the region – notably the on-land infrastructure for the Scottish Power projects. These should not be viewed in isolation;
- The traffic modelling is again questionable;
- The model used in EDF Energy's exhibitions did not show the constructions site – it only showed the completed power station. This created a misleading impression of the actual impact of the Project which will blight the region for 10-12 years;
- In many cases the questions asked are peripheral to the core concern which has not been addressed leaving it to consultees to work their real concerns into their responses;
- And finally: we are very disappointed that EDF Energy has not taken seriously the concerns raised by the majority of consultees to the Stage 2 Consultation - a more collaborative approach would have been appropriate and would have benefited EDF Energy in the longer-term given it hopes to be a neighbour to this area for the next 70 years or more.

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