



Sizewell Nuclear New Build
FREEPOST LON20574
London W1E 3EZ

Suffolk Coastal District & Suffolk County
Councils
c/o Sizewell C Project Office
Melton Hill
Woodbridge
Suffolk IP12 1AU

6 February 2013

Dear Mr Mayson

Suffolk Councils' response to the Stage 1 Consultation

Please find enclosed a joint response from Suffolk Coastal District and Suffolk County Councils in response to your Stage 1 consultation in respect of the proposed Sizewell C nuclear new build. This response has been agreed by both councils' cabinets and has taken on board views from officers across the two councils as well as those from external stakeholders.

In addition to the councils' response please find attached a copy of both councils' cabinet reports and a copy of the updated A12 Four Villages By Pass report produced by AECOM on behalf of Suffolk County Council.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Guy McGregor'.

CLlr Guy McGregor
Chair Sizewell C Joint Local Authorities
Group

A handwritten signature in black ink, appearing to read 'Andy Smith'.

CLlr Andy Smith
Vice-Chair Sizewell C Joint Local
Authorities Group

Joint Response from Suffolk County & Suffolk Coastal District Councils to EDF's Sizewell C Stage 1 Consultation

1. The Councils recognise the significant scale of the proposals being developed by EDF, as the largest infrastructure project in the East of England, and its importance at a local, sub-regional and national level. The contribution to the nation's energy resources and the economic opportunities it could afford locally are acknowledged to be positive benefits. These benefits have to be balanced against the impacts on the environment, the pressures on our communities and the transport network. The local authorities see their role as maximising the potential benefits whilst minimising the inevitable negative impacts of a project of this magnitude.
2. The Councils continue to support the development of nuclear power stations in principle and support the Sizewell C proposal on the basis that EDF should provide a lasting legacy for the economy and the local communities, act as an environmental exemplar, and make appropriate provision for transport and the funding of wider community benefits.
3. Inadequate information has been made available by EDF on a wide range of topics which makes giving robust comments very difficult at times. The Councils therefore reserve the right to supplement this response in due course. Further information must be urgently provided by EDF so that the Councils and communities can engage fully on the development of proposals before the second stage of consultation.
4. The Councils welcome the economic opportunities that a new power station could bring in terms of the construction and operational phases. However it considers that:
 - a) EDF will need to continue working with the local authorities and other bodies in the East of England to provide **opportunities for local businesses** to take advantage of this project. This can be effectively achieved both through the stimulation of the local supply chain and the development of a lasting economic legacy which endures beyond the construction phase .
 - b) following stage 1 and prior to the application to the Planning Inspectorate, EDF will need to agree with the local authorities on the following matters related to **skills**:
 - i) Development and implementation of education and workforce strategies relating to the construction and operational phases of the project; including how 'hard to reach' groups will be engaged;
 - ii) The type of interventions and support projects required to maximise the opportunities for Suffolk people. These could include pathways to higher skilled occupations and the up-skilling/ re-skilling of workers to sustain employment at each stage of the development and into the operational phase in association with the Suffolk's Raising the Bar initiative. EDF

will need to work with other companies in the energy sector in the region; and

- iii) The degree to which skills displacement as a result of the project can be mitigated.
5. Tackling the **social and community issues** that will emerge during the construction and operational phases of a new power station will be a critical element in achieving the success of the project. Accordingly the Councils will expect to work closely with EDF in developing proposals in this area which minimise the disruption to local communities.
 6. A package of **community benefits** is essential to compensate the community for the perceived dis-benefits of hosting a nuclear power plant. The Councils will continue to work together with local authorities elsewhere in the country to lobby Government and industry to ensure that an adequate package is provided.
 7. Given the high quality of the **landscape and ecology** in the area, and in particular the national designations of both that will be affected, it is critical that EDF delivers the scheme as an environmental exemplar. This needs to cover how this major infrastructure scheme can be accommodated in an area with such constraints and how mitigation measures may be developed to overcome any remaining impacts . In particular:
 - a) a very high quality of design for all of the proposals needs to be achieved and unavoidable impacts effectively mitigated;
 - b) enhancements to the landscape of the Area of Outstanding National Beauty and wider area should be achieved for the benefit of people and the environment. Enhancements to the local biodiversity network should also be implemented to facilitate climate change adaptation for wildlife and to improve the amenity value of the land around the site. These could partly be attained through implementing a landscape vision for the EDF estate but will also require measures over a wider geographical area; and
 - c) any structures that could have an effect on **coastal processes** will need to be specifically designed to minimise impact on the wider coast, not just the immediate frontage of the power station. The proposed development has potential to change shoreline evolution over the construction, operation and decommissioning phases and therefore there should be continued monitoring of processes and avoidance or correction if necessary. The objective should be for EDF to manage the coast jointly with the Environment Agency and Suffolk Coastal DC to ensure that Sizewell C does not become a promontory. There should be continued involvement of local communities in sharing information and engagement of the local authorities with EDF and the Environment Agency in the development of coastal management proposals.
 8. The Councils consider that it is particularly important that the transport implications of the construction and operational phases are positively and robustly addressed. In this context:

- a) it strongly believes that a **bypass for all four villages along the A12** (Farnham, Stratford St Andrew, Little Glemham and Marlesford) is necessary as a consequence of the additional traffic that will come from the Sizewell C construction project and that proposals for this should be included as associated development in any application to the Planning Inspectorate. All three options currently proposed by EDF are inadequate and not supported by the Councils. Further local consultation will be required to look at other options for this area;
- b) a study prepared by the County Council's consultants updating the 2006 study on the Four Villages Bypass will be submitted to EDF in support of this case;
- c) the Councils recognise that there will be serious impacts on the **B1122** and considers that further information is necessary on the traffic volumes likely on that road and **through Yoxford** and the mitigation necessary to deal with any impacts on the communities or environment. This may include road schemes considered for previous Sizewell projects;
- d) the Councils believe that due to the cumulative impact of traffic increases related to Sizewell C and other proposed developments along the A12 that this will justify a significant upgrading to the Seven Hills roundabout.
- e) the Councils strongly believe that the minor roads west of the A12 should be protected from substantial increases in traffic flows and that the strict enforcement and control of HGV routing both to and from the site will provide such protection
- f) further work is undertaken on the impact of the proposals on the **wider highway and rights of way** networks and possible mitigation. In addition there will need to be resources made available for continued maintenance of the existing road network during the construction phase ;
- g) further work needs to be undertaken urgently between the local authorities and EDF to provide a more realistic assessment of the transport implications upon which robust decisions on appropriate measures can be taken;
- h) further work needs to be undertaken to understand the in combination traffic impacts of other developments proposed along the A12 e.g. potential major housing development at Adastral Park, Martlesham.
- i) with regard to **access for construction workers** to the development:
 - i) EDF's forecasts currently under-estimate the potential level of car traffic to the site. Revised figures must be used in assessing impacts for what is required to support this development;

- ii) park and ride sites should not be located close to the construction site;
 - iii) more sustainable links will need to be put in place to provide transport for workers residing east of the A12; and
 - iv) rail has a greater role in providing access for construction workers closer to the site and provision should be made for the legacy use of the rail link to Leiston. Consideration should be given to the new technology that is available for rail provision.
- j) the Councils encourage the use of rail and sea for **freight deliveries** but further information on quantities and modes must be urgently provided so that the full impact of the proposals can be assessed;
- k) contingency measures will need to be provided to deal with freight deliveries in the event that weather and other events prevent delivery by sea;
- l) with regard to **rail freight**:
- i) the Councils, whilst welcoming the use of rail for freight deliveries, consider that the Rail Head Option east of Leiston (Option 1) for the location of a railhead would add to traffic flows on the immediate local highway network and that this could be overcome by direct rail deliveries to the site (Option 2). However, in considering routes for any such new rail link, significantly greater detail on the environmental consequences, the impact on local residents and the effect on highways and public rights of way is required. The local authorities would wish to engage with EDF on this matter and there is a strong case for a further round of local public consultation once more detail is available. In addition measures to reduce the impact of level crossings on the existing rail route needs to be given further consideration and
 - ii) the Councils welcome the proposals to increase the capacity of the East Suffolk line by providing a new loop at Wickham Market station. Further assurance is needed on the current and future capacity of the East Suffolk line and wider network to accommodate the extra freight movements without jeopardising other rail services.
- m) despite the inadequacies of the traffic data that has been provided, it is already evident that **Heavy Goods Vehicle (HGV) movements** will increase substantially. In order to mitigate the severe impacts of this increased HGV traffic significant improvements will be needed to the road network used by such vehicles. Further work will be required to identify the locations affected and the mitigations required; and
- n) the Councils support the provision of a **freight management facility** and has a strong preference for sites off the A14 rather than

as part of the southern park and ride sites. Such sites should also be considered for freight consolidation purposes and for their possible legacy potential. More information is required on the effectiveness of other proposals for managing freight deliveries.

9. For the **main site**, the Councils consider that:
 - a) that the building should be seen as an exemplar of good design, both in terms of the buildings themselves and the lighting and landscaping around them;
 - b) the area of land taken for permanent development should be minimised to limit the impact on the Sites of Special Scientific Interest (SSSI);
 - c) the important ecological corridor between SSSIs must be retained, and the impact on coastal processes and flood defence minimised; and
 - d) public access to the beach should be retained during the construction process
 - e) EDF should ensure, in conjunction with the relevant water supply company, adequate supplies of freshwater are made available to the site without prejudicing water supplies in the area
10. With regard to **nuclear waste** arising from this development, EDF must:
 - a) clarify its choice of spent fuel storage;
 - b) clarify its contingency arrangements for fuel storage should it prove impossible to deliver a geological repository or the period for delivering such a facility is significantly delayed;
 - c) demonstrate the relationship of the fuel storage buildings on the B and C sites; and
 - d) consider an element of the community benefit being related to the possible long term issues of hosting the waste storage.
11. EDF must provide greater clarity on the destination of any **non-radioactive waste** arisings consequent on the construction of the power station
12. With regard to the **lay-down and construction areas**, the Councils consider that:
 - a) these are very extensive and the need for them should be more fully justified. In particular the Councils object to the use of land which overlooks the Minsmere Valley, Theberton and Leiston Abbey and the land at Pill Box Field;
 - b) the bridleway running between the lay-down area and the site for the northern most accommodation campus (Option 1) should remain open at all times;
 - c) any use of land at Coronation Wood should retain the screening effect for the buildings at Sizewell B;

- d) more work needs to be done to assess the impact of the use of the land at east Leiston on local residents and on traffic volumes on Lover's Lane; and
- e) a phasing plan should be prepared for the restoration of the lay-down areas in line with a vision for the EDF estate. In addition, EDF should demonstrate how the access road will be treated so that it minimises its impact on the AONB once the construction phase is completed.

13. On **Associated Development**, the Councils consider that there are deficiencies in the process of evaluating the impacts of the options proposed for development and EDF should act to rectify the issues accordingly. With regard to the specific proposals, the Councils consider that:

- a) with regard to the **accommodation campus** proposals, the Councils do not agree that there is a strong rationale for a single site when all factors are taken into account. On the sites included in EDF's consultation, Option 2 (Sizewell Gap) should be eliminated immediately due to its prominence in the Area of Outstanding Natural Beauty.. Further work is needed to understand the comparative merits of Options 1 (adjacent to the lay-down area) and 3 (Leiston East) and indeed whether there are alternative permutations or locations that are more satisfactory. EDF should work with the local authorities to formulate an Accommodation Strategy which not only meets the requirements of the development, but also the future needs of the local community, possible future housing and tourism functions and furthermore minimises the overall traffic impact :
- b) with regard to the **northern park and ride sites**, Options 1 (Yoxford Road) and 3 (A12/A144 junction) should be discounted immediately. Option 2 (Darsham) is the relative preference and should be retained for more detailed study, though it may still be considered to be too close to the main site for the primary northern park and ride site. It could, however, serve a more localised function, complementing an additional facility further north which would be closer to larger towns hosting a major share of the labour supply;
- c) with regard to the **southern park and ride sites**, Option 3 (Potash Corner, Bredfield) should be discounted immediately. Option 1 (Wickham Market) should be retained to consider whether appropriate archaeological mitigation and safe highway access could be achieved. Option 2 (Woodbridge) should also be retained for more detailed study, including consideration of any potential low-intensity legacy use and, depending on further studies, could be the Council's preferred option. In advance of the outcome of detailed traffic modelling it is not possible to say that either of these potential sites is ideally located. Furthermore EDF should also keep open the option of using other potential sites to the south.

- d) for the **freight management facility**, Option 3 (Seven Hills) must be discounted for environmental reasons immediately. Further work must be undertaken to consider how legacy use can be secured on Option 2 (east of Orwell Lorry Park). The impacts on the AONB of either Option 1 (west of Orwell Lorry Park) or 2 should be taken into account and if necessary mitigated; and
 - e) the proposal for a **visitor centre** is supported in principle and should address Sizewell's contribution to carbon reduction, its part in the Suffolk energy coast and its location in an Area of Outstanding Natural Beauty. Option 1 east of Lover's Lane must be discounted for environmental reasons immediately. Further consideration needs to be given as to the role of the visitor centre in the short and long term and consequently where this important facility is best located.
14. The Councils will work with other interested parties to lobby for the inclusion of the full Four Villages Bypass on the A12 within this scheme.