

Key Issues Paper, October 2012

Introduction

Since the inception of the Panning Performance Agreement (PPA) numerous meetings and discussions have taken place across the various approved and draft work packages. As a result of this dialogue a number of key issues have been identified that warrant further debate within a more formal setting i.e. the PPA board meeting.

These issues are set out below with a brief description of the key points. The intention of highlighting these points is not necessarily to reach a conclusion at the board meeting but to ensure that all board members are aware of the existence of these issues and have the opportunity to debate them with all the PPA partners being present.

Those issues that have satisfactorily been addressed since the last board meeting have been removed and those yet to be addressed have been retained. In addition issues 1 and 2 below has been added and issue 3 has been updated.

Key issues

1. Visual Impact

The proposed development will be within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and as such all possible measures will need to be explored in order to reduce visual impact. Sizewell B is seen as an exemplar of what can be achieved within an environmentally sensitive area and the fear is that the C station will not achieve this level of design quality.

The local authorities are keen to understand what the potential is to reduce the visual impact of the C station e.g. cladding, colour treatments etc

2. Stage 1 Consultation

There are concerns about the proposed Stage 1 consultation programme. The information that will be available prior to the consultation and the time available within the programme to assess this appears limited. Unless the consultation period lasts for at least 11 weeks both councils will find it difficult to meet their respective cabinet timetables and thereby meet the response deadline. Furthermore the potential for the consultation period to straddle the Christmas holidays will make the deadline even more difficult to meet.

An extension of the proposed eight weeks consultation programme or information/confirmation that the consultation will be followed by individual package consultations is sought.

3. Transport Issues

We are aware that the proposals for transport were one of the most contentious items for the Hinkley Point C proposal and that it is of considerable political interest in Suffolk. Accordingly, the Board will need to keep abreast of on-going progress on the transport work stream to ensure that, as far as possible, all is being done to ensure that the impact of development-related traffic is minimised. Initially it will be important to ensure that all parties agree that the means of assessment of transport issues is appropriate and subsequently that the outcomes are fully understood and any appropriate measures are part of the DCO application.

There is concern about the timescales required to enable a by-pass of the A12 four villages to be constructed in time to mitigate the impact of construction traffic. This concern relates to the time required for environmental surveys and assessments in addition to the design of the scheme; this work would need to be completed as part of the submission for the DCO application. Suffolk County Council have asked that EDFE's consultants review the process timescales as soon as possible to ensure that their programme accommodates the works required. Overall, mitigation measures should be programmed to be delivered before the commencement of the main development.

Currently there is limited time for SCC to assess the gravity and transport model prior to the stage one consultation, this will impact on their ability to respond effectively to the consultation. A request has also been made for a programme of works being carried out, without this information there is a risk associated with resourcing work, this particularly relates to engaging consultants.

4. Support for Town and Parish Councils

At the Joint Local Authorities Group (JLAG) engagement event in May a number of representatives of town and parish councils requested support (financial or otherwise) in order to effectively respond to EDFE's public consultation. Furthermore the project office has received a direct request from Leiston Town Council and this is unlikely to be the last in the run up to the Stage 1 consultation (S1).

We note that in Somerset a Community Planning work package was established which identified the support to be provided to local councils using funds from the PPA. We understand that a series of workshops were hosted by the Somerset authorities in order to support local councils in producing their consultation responses.

As a result of the requests received by the local authorities and the precedent set in Somerset we are seeking to agree the principal that the PPA can be used to provide support for local town and parish councils within the vicinity of Sizewell. We would of course seek EDFE's agreement ahead of providing any specific support.

5. Skills and workforce development

The availability of a skilled workforce will be a critical factor in the success of the Sizewell C construction project and the extent to which the employment opportunities are secured locally will influence the added value and economic legacy of the new build project. The project also has the potential to catalyse sustained improvements in education and skills attainment in the local area and across the county.

EDFE currently defines 'local' as the 90 minute construction daily commuting zone. From the experiences at Hinkley Point and the early discussions of the socio-economic work stream we can expect EDFE to indicate that they intend to recruit somewhere between 30 and 40 percent of the Sizewell workforce from this area. With the right interventions at the right time there is clearly an opportunity to maximise these local opportunities.

The local authorities welcome EDFE's commitment to local education, employment and training. Early discussions between officers and EDFE's Organisation and Talent Development team have been positive. The key areas for discussion going forward will be:

- i. The development and implementation of education and workforce strategies relating to the construction and operational phases of the project.
- ii. The type of interventions and support projects required to maximise the opportunities for Suffolk people; including the nature of any capital investment (e.g. skills and training facilities); pathways to higher skilled occupations for local people and the up-skilling and re-skilling of workers to sustain employment at each stage of the development.
- iii. The degree to which skills displacement as a result of the project can be mitigated. This will be of particular concern to sectors with similar skills requirements and where an increase in staff turnover could lead to significant gaps (e.g. other major construction and engineering projects).

6. Issues raised by Nuclear Opposition Groups

Following a meeting between JLAG and representatives of a number of Nuclear Opposition Groups we agreed to raise a number of issues with EDFE. Whilst we accept that EDFE may not be able to provide immediate answers to these issues it is

appropriate that these concerns are raised at this time with a commitment from EDFE that a response will be provided when the relevant information is available. The three main concerns raised were:

- i. The length of time nuclear waste will need to be stored on site. It has been suggested that spent fuel will need to be stored on site for around 160 years – can EDFE confirm this? Furthermore we understand that although proportionately less in volume, the waste produced by the EPR is significantly more radioactive than that produced by the B station and that is part of the reason for the long on site storage period.
- ii. Outage Spikes: It is alleged that the radiation spikes which occur during planned outages at the B station may have an impact on human health. Furthermore the operation of Sizewell C will lead to a trebling of these planned outages and as such the frequency of these radiation spikes will also treble. Can EDFE confirm that this issue is being investigated?
- iii. Water demand: Concern has been expressed that during the construction of the C station the demand for water will be so great that it will have an impact on water supplies to Leiston residents. Can EDFE confirm that this issue is being examined and allay such fears?

7. Potential Hostel Location and Emergency Planning Zone

The District Council and ONR have held discussions in respect of the potential future location of housing within a 2, 4, 8 & 15 kilometre radius of the current power stations at Sizewell. These discussions have highlighted the potential need for a hostel to serve the construction of a future power station(s). ONR were advised that the District Council and EDFE would prefer a sustainable location close to Leiston and the new build site. ONR is currently considering the position in respect of the Defined Emergency Planning Zones (DEPZs) for nuclear sites in the light of the Weightman Report. The outcome of these deliberations will inform a proposed review of the DEPZ and extendable emergency planning provisions that is going to be the subject of a forthcoming consultation by the Suffolk Resilience Forum in respect of the future emergency planning arrangements for the current Sizewell nuclear sites.

The outcome of this consultation and the policy position of the ONR will, potentially, have a significant impact on the choice of location for associated developments within both the revised DEPZ and the extended zone(s).

8. Loss of SSSI, bridge design and ecological corridor

EDFE and their consultants have presented options on the design of a permanent bridge which would link the new northern access road to the C site. In addition there

is a proposal for a temporary bridge in the same area. The bridges would cross an important ecological and fluvial corridor within the SSSI area and inevitably have a significant impact on this sensitive area. The concern is that an engineering solution is being developed ahead of a full understanding of the importance of this corridor and the impact of bridge construction.

There are also a number of related concerns regarding the impact on the Sizewell Belts as a result of the direct loss of designated habitat and indirect impacts during construction. Greater understanding is needed of the risk of the loss of ecological connectivity between the wetland habitats contained within Sizewell Belts SSSI and Minsmere-Walberswick Marshes SSSI to the north. EDFE need to address how ecological and hydrological connectivity between the wetland ecosystems will be protected and maintained during the construction and operational phases.

9. Coastal Erosion and Flood Risk Management

i. Long-term coastal management approach

The view of the local authorities is that the most effective approach to the management of the potential impact of the proposed site on coastal processes is a commitment by EDFE, in partnership with key stakeholders, to a monitoring, assessment and mitigation plan that provides a high level of understanding of the nature and variability of natural processes. This should be followed by a regular review of actual vs forecast changes and the delivery of mitigation measures within an agreed framework of sustainability.

Such an approach will require stakeholder recognition and acceptance that in order to ensure the safety of the Sizewell site, actions will be required that may alter natural shoreline evolution. Options for responses to the consequences of these interventions (short and long-term) should be discussed with stakeholders and agreement reached on the most acceptable compromise of competing objectives. The hard decisions may be many years ahead but the creation of a framework within which sound decisions are made should take place at the earliest opportunity.

ii. Minsmere Sluice

Minsmere sluice acts a structure for coastal protection and provides a freshwater drainage function. The current Environment Agency (EA) strategy for the sluice envisages its retention over the next 20 years; however EA will not maintain it for the benefit of EDFE's Sizewell frontage. After 20 years the gravity discharge appears to be no longer a feasible option due to anticipated sea level rise and therefore the conclusion is that the sluice has an effective life as a drainage control mechanism of 15 -20 years.

EDFE's coastal protection and hydrological assessments will need to be adaptive over a period of time to take account of the future location of the sluice – possibly to the south nearer to the power station site. EDFE will need to consider if they would be

prepared to maintain the sluice and convert it to a pumped rather than a gravity discharge system.

EDFE's studies need to establish the coastal, flood risk and drainage issues affected by the options concerning the future of the sluice. The local authorities, Natural England and Suffolk Wildlife Trust are keen to see Sizewell Belts retained as a freshwater habitat. Furthermore the RSPB want the Minsmere reserve protected from saltwater inundation for the next 50 years in order to allow them time to develop another nationally/internationally important coastal freshwater reserve elsewhere. Therefore EDFE's long-term vision and its proposals for coastal protection and hydrological discharges should incorporate these principles.

A greater understanding of the two functions of the sluice, and agreeing responsibility for its operation and replacement over the whole life of the proposed C station, is therefore critical to the design and agreement of coastal protection, land drainage and SSSI conservation works associated with the new build.

iii. Consultation on coastal impacts

Communities in close proximity to the proposed and existing power stations, such as Thorpeness, have a keen interest in the assessment of the short and long-term impacts on coastal processes of the proposed new build. This needs to be recognised by EDFE and consideration given to providing information to communities via the Sizewell C new build website at the earliest opportunity on how these issues are managed currently and in the future.

10. Community fund

A number of stakeholder groups and organisations have already set out their requirements ahead of any announcements on mitigation and community benefits. The Development Consent Order (DCO) submission for Hinkley Point C included substantial investment by EDFE including a Community Impact Mitigation fund which is likely to be seen by local groups as a benchmark.

The New Nuclear Local Authorities Group (NNLAG) has produced a paper which sets out proposals for a national Community Benefit protocol. The advantage of creating such a protocol is that any community benefit scheme can be undertaken within the boundaries of an agreed framework which is supported by the industry and government. Furthermore such a protocol would provide a consistent framework for determining the scope and scale of a community benefit scheme whilst retaining flexibility to reflect local circumstances. Discussions with the Department of Energy and Climate Change (DECC), the Nuclear Industry Association (NIA) and developers are currently underway in order to determine the most appropriate way to fund such a scheme.

The key issue for the board to discuss is how to manage expectations in relation to the scale and range of community benefit and to understand how such investment will be prioritised through the consultation process.

