**SIZEWELL C**

**RESPONSE OUTLINE FOR PARISH COUNCIL MEETING ON JANUARY 24TH 2017**

**1 Consultation Process**

* The Plans for Sizewell C have to go through 3 consultation stages before the Planning Inspector considers them and makes a decision;
* STAGE 1 was completed in 2013, and responses were made by Suffolk County Council and Suffolk Coastal DC, the statutory bodies for local consultation. Sudbourne Parish Council also made a response;
* STAGE 2 completes on FEBRUARY 3rd 2017, and SCC and SCDC are encouraging all Parish and Town to make further and more detailed responses, as **this is the last stage at which matters of principle are likely to be affected by the consultation;**
* Stage 3 will follow in 2018, and will be a more technical process of commenting on the ‘Development Consent Order’ put forward by EDF. Parish Councils are unlikely to be able to comment effectively, excepting those closest to the site.

**2 Current proposals**

* The consultation document and the summary document are both available on the EDF consultation website for those who would like to review them, and copies will be available at the meeting. There have been some good changes from the Stage 1 document, but in general the feeling (within the Joint Local Authority Group, and with Town and Parish councils) is that EDF have not moved far enough towards what was asked for in the first consultation, especially in the key areas of **transport, environment** and **economic strategy**. There is also some concern about the lack of detail on some highly controversial areas such as the new jetty and its impact on shoreline drift, and the traffic impact of removing the proposal for a freight management centre south of Wickham Market.

**3 Parish Council responses**

* EDF arranged a series of exhibitions showing the key Stage 3 proposals in November and December, attended by councillors, and the Joint Group arranged briefing meetings and professional support for local councillors, and we have taken advantage of both.
* As a Parish Council, we have agreed that it is sensible to concentrate on a small number of key issues in our response, where we can show that we are genuinely impacted *as a community*, rather than to respond to all fourteen consultation questions in detail. I suggest that we prioritise six items (the full list is set out below), but it is of course open to individuals in the Parish to make their own responses on any other question, or to make the case at the meeting for a Parish response.
* The 14 consultation question areas are set out below, with my estimate of which should be prioritised for response. The list is followed by draft responses in the ‘High Prority’ areas. I will provide copies for the meeting should anybody wish to take them away. Note that I have not proposed that we comment on the consultation process, as I imagine almost everybody else *will*, and life is too short…

SIZEWELL C STAGE 2 CONSULTATION

ASSESSMENT OF KEY AREAS FOR SUDBOURNE PARISH

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | PROPOSAL AREA | RELEVANCE TO SPC | | |
|  |  | HIGH | MODERATE | LOW |
| 1 | Sizewell C Proposals – Overall | X |  |  |
| 2 | Main Development Site: Environment | X |  |  |
| 3 | Main Development Site: New Access Road |  |  | X |
| 4 | Main Development Site: Managing Construction Materials |  | X |  |
| 5 | Accommodation: Overall Strategy |  | X |  |
| 6 | Accommodation: Campus Layout |  |  | X |
| 7 | Transport: Overall Strategy | X |  |  |
| 8 | Transport: Rail | X |  |  |
| 9 | Transport Sea |  | X |  |
| 10 | Transport: Park and Ride |  | X |  |
| 11 | Transport: Road Improvements – A12 | X |  |  |
| 12 | Transport: Road Improvements – Yoxford/B1122 |  | X |  |
| 13 | People and Economy | X |  |  |
| 14 | Consultation Process |  | X |  |

**SIZEWELL C STAGE CONSULTATION**

**SUDBOURNE PARISH COUNCIL PROPOSED RESPONSE**

**1 Sizewell C Proposals – Overall**

Sudbourne PC recognise the national necessity for a project of this sort, whilst regretting that it has to be placed in an area of extremely high ecological and environmental value which already has significant transport and traffic problems. The project is very likely to go ahead, and SPC want to help ensure that the worst impacts are minimised or mitigated. At the same time we want to ensure that the parishes affected make the most of the positive impacts on the economy, including skills training, employment, improvements in tourism and **above all** a lasting improvement to transport and other infrastructure. The current proposals do not go nearly far enough in some of these respects, and we are disappointed that feedback from the first stage of consultation has not had a greater impact on this draft.

**2 Main Development Site: Environment**

Building a new nuclear power station in an AONB will damage the existing historic environment, the local ecology, and will (in this case) even lead to the removal of part of a SSSI. Local footpaths and bridleways will be closed temporarily (some permanently), and there will be further light, noise and air quality pollution and degradation, and consequent loss of biodiversity. Coastal processes will be affected by the new buildings and the jetty structure and Beach Landing Facility. **All of this is freely admitted in the Stage 2 consultation document, together with mitigation plans; but many of the mitigation plans are weak – for example the reed-bed proposed to compensate for the SSSI loss**. Too many of the other mitigation plans depend on ongoing research and planning that is not yet complete – the document is full of ‘..*We will present more detail…at a later stage of construction*..’ or ‘..*Our continuing studies will help us to determine*…’ or ‘..*we will present further detail at a later stage of consultation*..’. **This is not nearly good enough, and not acceptable at this planning stage,** nor is it clear whether the current plans are properly co-ordinated with decommissioning plans at the existing plant. Moreover, the design of the reactor buildings themselves is being imposed without option or consultation, and will have a huge impact **for the next century** on this stretch of coastline.

**3 Transport: Overall Strategy**

As far as Sudbourne is concerned, the impacts of the transport strategy are secondary; but we will be affected by an overall increase in (a) road traffic on the A12 and (b) rail traffic through Melton to Wickham Market and Sizewell. The impact will be worst in the three central years of a 10-12 year construction period, and although EDF claim the actual increase in road traffic at Woodbridge will be only some 3% and at Farnham about 6%, the actual numbers of journeys are huge – the peak construction workforce of 5,600 and the building works themselves will be serviced by peak HGV movements of 450 a day (double this on the busiest day), 400 Park & Ride bus movements, and up to 700 LGV movements a day, plus of course individual car journeys. The freight management centre S of Woodbridge has been removed from the plans, and EDF will rely on ANPR and mobile freight monitoring to avoid jams and bottlenecks. **EDF must** **ensure that improvements in mobile connectivity to provide mobile monitoring have a positive local impact.** Plans for rail improvements at Campsea Ashe and for maximising sea freight movements do not seem to be very much further forward than in the stage 1 document, and **it is regrettable that there is not greater certainty in either.**

**Our overall impression is that EDF are trying (quite hard) to deal with an intractable transport problem that will inevitably have serious and negative impacts for communities served by the A12 and local rail services, *unless* we can take this opportunity to achieve the four village bypass around Stratford, Farnham, Little Glemham and Marlesford.**

**4 Transport: Rail**

**The proposal to double the tracks at Campsea is welcomed,** and EDF should also ensure that there are train movement indicators all along the Lowestoft line (**this will need better mobile communications,** which would have a good knockon effect). We need more information on the effect of freight rail traffic on the frequency and length of Melton level crossing, as this strongly affects access to all the villages along the B1084 and beyond (Butley /Chillesford/Orford/Sudbourne etc).

5 **Transport: Road Improvements – A12**

The four options set out by EDF extend only as far as a two-village bypass around Stratford St Andrew and Farnham. **We strongly agree with SCC and SCDC that the *minimum* acceptable mitigation is option 4, the 2-village bypass, and only on the basis that the funds set aside by EDF are available for transfer into any scheme developed by SCC to build the 4-village bypass, based on the options established in SCC’s 2014 Four Villages Study**. We understand that SCC have received central funding to develop a business case for the four villages bypass, and **strongly support this development.**

**6 People and Economy**

SZC should be required to provide a significant boost to local economies in the longer term, in recognition of the burdens placed on East Suffolk economies over the construction period and beyond. **We strongly support the position taken by SCDC and SCC to hold EDF to their commitments to promote ‘..sustainable careers in the key sectors of the economy that will support the construction of Sizewell C..’, and to recruit at least 36% of the construction workforce from the local area in the peak construction phase.** **SCC/SCDC should put pressure on EDF to maximise inward investment in skills training from the primary school level upwards, to support innovation and the development of new business start-ups locally across a range of business sectors, and to prioritise local *skilled* employment**. We welcome the commitment to work with skills and education providers, and strongly urge EDF to support the *Developing Suffolk Talent* programme as part of this commitment.

We recognise that there may be considerable displacement of tourist activity southwards from the construction area as footpaths and access roads are closed or diverted and the traffic increase discourages travel towards (e.g.) Minsmere; this may provide additional (but unmanaged) activity around Aldeburgh, Orford and the Alde & Ore estuary generally. **The potential impacts should be recognised and quantified in the next stage of consultation.**

Although it will have secondary rather than direct impact on Sudbourne, **it is very disappointing** that the potential impacts on local services (GPs, schools, emergency services) of the relatively vast new construction population (around 10 times the size of Subourne’s own population) are dismissed entirely at this stage of the process with the rather contemptuous phrase ‘..Following Stage 2, we will undertake further detailed analysis…’. The next stage is the submission of the Development Consent Order, which will be a matter for the Planning Inspectorate to review, and not for Parish Councils – so **it is very hard to understand why this has not been dealt with in some detail at this stage.**