

# **SIZEWELL C Proposed Nuclear Development**

## **Stage 3 Pre-Application Consultation**

### **[DRAFT] Response from the Parish Council for Walberswick**

**Proposed for approval by Walberswick Parish Council on 19 March 2019**

#### **Summary**

Walberswick Parish Council is deeply concerned that the Sizewell C project will have negative impacts on the village, and that there are currently insufficient mitigation proposals which address this, meaning that we cannot support the proposals as they stand

Our concerns fall into six broad areas, which are laid out in more detail below this summary: Economy, Ecology, Transportation of Construction materials, Park & Ride, Road Improvements & Accommodation

The demographics of Walberswick and the surrounding villages, its heritage and character, its location within an Area of Outstanding Natural Beauty and the importance of tourism, have yet to be considered adequately by EDF.

While Walberswick village is located at the end of the B1137 and therefore will not have within the village boundaries itself the traffic and congestion caused by Sizewell C construction, the Village is dependent on all the surrounding roads to get in and out and therefore will be severely impacted by any decisions taken. In particular, Walberswick Parish Council would like to draw attention to the traffic figures and submissions put forward by both Blythburgh and Westleton as the two villages that frame the main route by which people come in and out of Walberswick.

In this regard, the Walberswick Parish Council urges the diversion of transport away from the roads to sea and rail transport. EDF needs to reconsider these possibilities, or at a minimum, if sea if not possible, provide the extra investment in BOTH road and rail infrastructure to help mitigate the very substantial negative impacts that the 12-15 years of construction and deconstruction will bring to all the inhabitants and visitors to coastal Suffolk.

The council is also very concerned about coastal erosion to the north of the Sizewell site and possible impacts on the Walberswick Coastline and Blyth estuary. There has not been sufficient study of these impacts and we would insist that these be completed prior to decisions on the construction and any planning application.

Walberswick parish council does not believe that the use of the B1122 for access to the construction site is feasible. The building of a new link road south of Yoxford is supported,

with a connection to it for traffic from the north. The link roads are necessary no matter what strategy is adopted – sea, rail or land-led. Likewise, certain improvements to the rail system as part of the rail-led strategy should be adopted as part of the road-led strategy.

The proposals for a workers' campus, raised at each stage of the consultation, still fail to recognize the negative impacts on local communities, fail to provide legacy housing, and will have considerable negative environmental impacts.

To date, the information provided through the consultation process remains inadequate, making it more difficult to prepare constructive responses. The proposal to consult with individual communities is welcomed but this can only occur after EDF provides vital missing information and studies. In this regard, we reference the submission of Suffolk County Council. There is particular concern about the insufficiency of information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will indeed be mitigated at all.

We would strongly urge that EDF be required to have all mitigation construction in place PRIOR to the start of construction.

## 1) ECONOMY

Walberswick is an important part of one of Suffolk's most historic areas with a history going back some 1400 years. It has approximately [To be inserted] households, but its population roughly doubles during summers and school holidays as it is a year round tourist destination. Walberswick is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with beautiful coastlines, beaches, tidal river, marsh, heath, small woods, pasture and arable fields.

Walberswick is a beloved village amongst both its residents and visitors. People come to Walberswick to enjoy the beaches, natural beauty and heritage. The continued existence of the village economy, which is based around two pubs, 5 shops and many holiday lets, is entirely dependent on the village remaining a significant tourist attraction on the Suffolk Coast. The current village businesses and amenities could not be supported by the year-round residents alone.

The impact of the Sizewell construction on the natural beauty of the area, the coastline, the wildlife and dark night skies is very likely to be highly detrimental to the life and economy of Walberswick and surrounding villages. Traffic congestion on the A12 and the B1125, along with possible disruption of train travel if sufficient investment is not made to upgrading for freight traffic, will make the trip into Walberswick long and uncertain. The current practice of many residents and visitors cycling in and out of the village is likely to be irreparably harmed by the constant heavy traffic on all routes associated with the B1125 and A12. This will undoubtedly have a highly negative impact on visitor numbers and visitor experience. Growing congestion and lengthy and uncertain travel times to reach Walberswick (which will inevitably increase year on year as construction proceeds), and the inability for visitors to enjoy the natural beauty south of Walberswick because of the

construction, will certainly deter tourist arrivals. It is debatable whether these characteristics, harmed during the long period of construction, will ever return. Moreover, many of the older residents of the village will never live to see the end of the construction nor any return to the pre-Sizewell C AONB.

## **2) ECOLOGY**

We are concerned that there is a significant amount of environmental assessment and information missing from the documents. The consultation documents state that this information will be presented in full as part of the Environmental Statement which will accompany the Development Consent Order (DCO) application. However, given how the project has changed between the Stage 2 and Stage 3 consultations, we are concerned that the approach of presenting significant volumes of new/updated information at the time of the DCO will make it very difficult for consultees and the public to respond effectively. By way of comparison, the PEI consultations for the East Anglia ONE NORTH and TWO offshore windfarms have included full draft Environmental Statements.

The site proposed for Sizewell C sits within a network of sites designated for their international nature conservation importance; this includes the Minsmere-Walberswick Special Protection Area, Minsmere-Walberswick Heaths Special Area of Conservation and Minsmere-Walberswick Ramsar site to the north, the Sandlings Special Protection Area to the south and the Outer Thames Estuary Special Protection Area and Southern North Sea cSAC offshore. These sites and the species that they support, are potentially vulnerable to impacts arising from the construction and operation of the power station. Details of the assessment of the full range of these impacts, as required under the Conservation of Habitats and Species Regulations (2017), is not included as part of the Stage 3 consultation and therefore there is no certainty that the likely impacts have been fully assessed or that acceptable avoidance or mitigation measures can/will be implemented as part of the proposed development.

Sizewell Marshes Site of Special Scientific Interest (SSSI) lies immediately to the west of the proposed site. From the information provided in the Stage 3 consultation it is clear that there are a number of elements of the proposed development which will result in an adverse impact on the SSSI. In particular, construction will result in the permanent loss of over 6 hectares of the SSSI with a further 3 hectares 'temporarily' impacted upon. We are also concerned that this supposed 'temporary' impact will in fact be permanent and therefore over 9 hectares of the SSSI will be lost (of a site that is only 105 hectares in total). In addition to the permanent loss of parts of the site, we are also concerned that the construction of the main platform and SSSI crossing structure will result in significant hydrological changes within the SSSI. The value of the SSSI is reliant on carefully controlled water levels and anything that creates unmanageable level changes will damage a large part of the site.

EDF are proposing both hard and soft sea defences to protect the power station and a beach landing facility for use during construction and operation of the site. From the information provided in the Stage 3 consultation it appears that these proposals have the

potential to result in significant impacts on coastal process, including affecting sediment transport along the coast and possibly causing embayment to the north of the station platform. Such impacts would not only damage the beach to the north and south (which supports a valuable assemblage of shingle flora), but also risks impacts on designated nature conservation sites further inland. In particular, the Minsmere-Walberswick Special Protection Area, Minsmere-Walberswick Heaths Special Area of Conservation, Minsmere-Walberswick Ramsar site and Minsmere-Walberswick Heaths and Marshes SSSI would all potentially be put at risk by changes in coastal process and the knock-on effects that these would have.

The council is further concerned that the use of green-field sites has not been minimized. Every effort must be made to return any area, used during construction and not required for operation, to its original condition, with the enhancement of environmental quality where this is possible. Walberswick parish council is not convinced that sufficient account has been taken of the negative impacts on the internationally important Minsmere nature reserve, in respect, for example, of contamination from waste and surface water, and noise and light pollution.

The disturbance of coastal processes is also of concern to the council. The loss of shingle from the Walberswick and Dunwich and Minsmere coastline, and impact on the tidal character of the Blyth estuary, with its implications for the flooding of properties in Walberswick, Blythburgh, Reydon and Southwold must be avoided. Given that the area around Sizewell is exposed to coastal erosion and flooding, more studies and 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. Studies and mitigation measures need to be completed before any decisions on the start of construction.

### **3) TRANSPORTATION OF CONSTRUCTION MATERIALS**

Walberswick parish council would support a solution that minimized the use of land and, by bridging rather than physically separating parts of SSSI, avoids the fragmentation of natural habitats. The views of specialist agencies such as Natural England and Suffolk Wildlife Trust (whose submissions we support) must be taken into account.

Using traffic figures gathered over the past year, there are some [To be inserted] cars entering Walberswick daily at peak times and some [To be inserted] cars even on the quietest days. Each of these movements must use the B1125 and the A12 to access the village. We support action to reduce the volume of freight carried by road; the council regrets the elimination of the sea option and the pessimism about the use of the rail-led strategy.

Walberswick parish council would, in principle, support a “near location” for borrow pits during construction to keep HGV traffic off access routes, although the council is concerned about the scale of the proposals. However, the creation of a new access route to facilitate the movement of material to the south, would obviate the need for borrow pits. On

environmental damage, we would lend our support to the views of Natural England and Suffolk Wildlife Trust (as experts in this field) regarding the preferred option.

Once the plant is operating we would urge that the impact of the creation of borrow pits during the construction phase be mitigated and the land restored as soon as possible to its former state (or better).

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 reasons for this are unclear and need to be justified; cost cannot be sufficient in this regard as the project must not be allowed to put cost before quality regarding impact on the surrounding environment

The recognition of the impact on some local villages and the provision of bypasses is welcomed. However, there is no evidence in the Stage 3 documentation of action to mitigate negative impacts on residents and visitors to Walberswick and surrounding villages. We are concerned that only HGVs will be controlled; LGVs and private cars will be controlled only indirectly through parking permission at the site and the provision of Park and Rides. Parking permits linked to name but not vehicle number will make it impossible to monitor “rat-running” or non-contractual use of minor roads.

As with the other surrounding villages, Walberswick parish council supports a rail-led strategy but is concerned at the pessimistic tone adopted in the Stage 3 documents. Without a sea option, both rail-led and road-led will require substantial improvements and investments given the enormous amount of materials that will need to be moved to and out of the site, in addition to worker traffic. In particular:

- a. The improvement of the Saxmundham - Leiston branch line with automatic level crossings and necessary upgrades to the track (Vol1, Chapter 9, Stage 3 Consultation). The Woodbridge to Saxmundham section of the East Suffolk line, currently single track, should be improved by reinstating the double track over the entire section. Repairs or replacement of existing track to freight standard and signalling upgrades are needed in some areas. This would be an important legacy development, permitting increased freight and passenger traffic during the construction and operational phases of Sizewell C. (See also 10.4).
- b. In addition to the freight trains, the use of one of the various types of 'Rolling Highway' systems should be considered, comprising of a series of very low flat wagons. Lorries drive up a ramp and then along the length of the train to the furthest empty wagon. At the destination the locomotive is removed, a ramp swung into place and the trucks driven off. If such a train could take 25 HGVs, running five trains a day of this type would remove 250 HGV movements from the roads. Such a scheme would require a depot in the Ipswich area. These systems are in use in France, Italy, Austria and Switzerland among other countries.

#### **4) PARK AND RIDE**

Walberswick parish council acknowledges that the creation of Park and Ride facilities will decrease the number of vehicles travelling to the construction site, the area needed for vehicle parking there, and facilitate the use of designated routes.

However, a Park and Ride on the A12 south of Blythburgh will increase the flow on the A12 and the B1125. The project documentation includes an assumption that some Sizewell C traffic will use the B1125 route through the villages of Blythburgh and Westleton. The junction of Walberswick's B1137 and B1125 is already dangerous and congested during rush hour and during summer months. It is not clear how this junction will be able to operate with the inevitable extra flows related to the Sizewell worker movements and rat-running from the A12.

The proposed Park and Ride at Darsham offers the prospect of a legacy facility of value to users of Darsham station but there is no reference to this. The provision of a roundabout to improve access is welcomed and should form part of EDF's final submission.

The experience of the Latitude Festival at Henham Park is relevant. Traffic flow data show that vehicle numbers were less important than the speed with which the vehicles left the A12 for the festival site. A failure to get traffic off the A12 onto the festival site quickly caused many miles of tailbacks until 2016 when a traffic management plan dealt successfully with that and other issues.

It must also be noted that the Darsham level crossing on the A12 will close up to twice every hour between 0700 and 2300 hours. Park and Ride traffic in both directions will be affected.

Given that the Park and Ride facility offers no direct benefits to and of the local community as it will be provided only for Sizewell workers, and that Sizewell traffic will exacerbate existing traffic problems, the parish council urges that these issues and proposed form an outline for direct discussions between EDF and Walberswick parish council and surrounding Councils.

#### **5) ROAD IMPROVEMENTS**

**A12** - Walberswick parish council supports the principle of improving the A12, not only to facilitate the movement of vehicles to the Sizewell site, but also to minimize the disruption of existing A12 traffic. The council supports the proposal for a two-village bypass around Farnham and Stratford St Andrew, as beneficial to existing users of the A12 and the villages concerned. The four village by-pass is also supported, but funding for this must be additional so that it is not used for the four village only to cut the mitigation measures elsewhere. We again emphasize that all A12 improvements must be done PRIOR to construction. To do otherwise will result in the most intolerable situation where there is increased Sizewell traffic AND road closures for A12 improvements.

**Yoxford/B1122** - Walberwick parish council welcomes the proposal to build a link road from the A12 south of Yoxford, and bypasses for Stratford St Mary, Farnham, Middleton Moor and Theberton. Walberswick Parish Council will however defer to other (expert) submissions to judge the suitability of any specific routes proposed.

The connection for A12 traffic from the north to the proposed link road is also welcomed. We are concerned that this link road is not part of the rail-led strategy. It is highly desirable as a means of bypassing Yoxford, to protect the village, the junction with the A1120, and existing users of the A12 and is essential in our view whether rail, road or sea-led.

No alternative routes in the event of road blockages or emergencies have been identified. Walberswick parish council fears that in the event of an incident, traffic from the north will be routed on the B1125. Walberswick parish council shares the concerns of all surrounding villages that possible alternative routes, such as the B1125 could not, without significant improvement, safely carry heavy Sizewell traffic.

A link road from south of Yoxford would provide a valuable legacy, of continued value during Sizewell C operation. Response to an emergency at Sizewell would also be facilitated.

## **6) ACCOMMODATION**

Walberswick parish council recognizes that housing workers at a campus reduces traffic flows on the local road networks during the peaks associated with shift changes and day worker patterns and would provide job opportunities for local communities during the construction phase and the possibility to move to jobs on site during the operational phase. However, the impact on local communities of the concentration of a large number of resident workers and the lack of legacy housing are matters of concern.

The council has concerns about utilising a green field site for the campus and the concomitant impact on local residents and tourism. Instead, the campus should be built at a location or locations, and to a standard to provide legacy housing for local communities or, for example, student accommodation.

The proposal for a sports facility to leave a legacy facility for local residents is welcomed. The creation of local job opportunities at the campus, and the provision of legacy housing, would represent mitigation.

The parish council has concerns regarding the recreational and homeward journeys of workers housed in the proposed campus. Such movements are not controlled and have the potential to swamp local communities and significantly increase traffic flows on the B1125

Walberswick parish council considers that the location of the proposed campus and the failure to provide legacy accommodation do not satisfy the points above.

Sizewell also needs to be self-sufficient for its workers' health care and education, to avoid placing an additional load on stretched local resources. Sizewell's recruitment policy should avoid damaging local facilities by poaching staff. Mitigation by providing financial support to local health & education services should be considered.

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