

Benhall and Sternfield Parish Council:

Suffolk Water Recycling Transfer and Storage Project

Environmental Impact Assessment – Scoping Opinion Consultation Response

Introduction:

Benhall and Sternfield Parish Council (the PC) is grateful for the opportunity to respond to this scoping opinion consultation and because it is extremely concerned about the unprecedented number of Nationally Significant Infrastructure Projects (NSIPs) being developed in East Suffolk at the moment, is going to comment on the Suffolk Water Recycling Transfer and Storage (SWRTS) project in the context of East Suffolk's cumulative impacts problem.

Cumulative Impacts:

The following major infrastructure projects are already being developed or are due to be developed in East Suffolk:

- Sizewell C twin reactor nuclear power station
- The Scottish Power Renewable (SPR) EA1N and EA2 substations at the Kiln Lane substation site at Friston
- NGET's connection hub at the Kiln Lane site
- The South Saxmundham Garden Neighbourhood development of 800 houses and an industrial retail unit etc
- The 250MW Helios Solar Park
- The SWRTS project
- Additional Solar Parks – one of which is expected to have a capacity of 600MW

Even though construction at Sizewell C (SZC) is still only in the early stages, it has already been extremely disruptive and the scale of this disruption has taken everyone by surprise. It is inevitable that developing two nuclear reactors on an eroding coastline, at the end of a constrained rural road network, right next to a town with a population less than half of the construction workforce, without an adequate supply of water will generate considerable construction impacts and that additional impacts from other NSIPs being added on top of this will contribute to an increasing cumulative impact burden that the East Suffolk community will have to withstand over the next 10 to 15 years.

During the SPR EA1N and EA2 DCOs – (the first of the current cohort of East Suffolk's major electrical infrastructure projects to be examined) – the Examining Authority (ExA) expressed concerns that the effects of the cumulative delivery of the SPR projects were **so substantially adverse** that utmost care would be required were any further projects to be connected at Friston in the future. The ExA also recognised that the NGET connection point – which was consented as part of the SPR projects rather than in its own right – was in fact a strategic '**de facto**' connection hub at a place in which **arguably such a facility should not**

be developed because its harms would outweigh its benefits (words in italicised bold letters taken from the EA1N and EA2 DCO documentation). Despite this caution, one electrical infrastructure project after another has been lined up to connect at the NGET connection hub at the Kiln Lane site and East Suffolk looks set to become an energy super-hub with 30% of the country's electricity supply being generated in or transmitted through it.

Lack of Coordinated Strategic Oversight:

With NSIP after NSIP being proposed for development in East Suffolk and with Developers looking at projects individually rather than cumulatively, it is very concerning that there appears to be a complete lack of strategic oversight of the concurrent development of all these major infrastructure projects in the same small geographical area.

An example of lack of oversight and poor coordination between projects was evident when the SWRTS project was first proposed and a water pipe between Saxmundham and SZC had mistakenly been positioned through the middle of the Saxmundham converter stations site.

Another example was seen when an inadequate water supply for construction and operation of SZC was cited as a reason that the project should not be recommended consent for development, but that when this recommendation was dismissed, a shortage of water supply at SZC ensued which created the need for the SWRTS project to provide 3 million litres of water per day to the SZC site. In other words, although the PC realises that there is a wider needs case for the SWRTS project, it also recognises the irony that the water requirements for construction of so many major infrastructure projects in East Suffolk is partly responsible for the needs case of the SWRTS project in the first place.

The PC would thus like to ensure that cumulative impact issues sit at the forefront of all aspects of the SWRTS project's Environmental Impact Assessment (EIA) and that effective strategic coordination exists between all the Developers of East Suffolk's multiple NSIPs.

Human Health and Wellbeing:

When human health is being considered from an EIA perspective, it seems that plenty of consideration is given to quantifiable factors such as working hours, but that a much more limited view is taken when addressing factors that are more difficult to quantify such as stress. However, since it is clear that stress is seen as the single most important factor that drives people towards the "wrong" end of the Mental Health Continuum, the PC is particularly worried that the effects of stress on the human beings stuck in the middle of so much construction are not being "seen" and that the increasing stress levels and feelings of anxiety and helplessness already being experienced are being overlooked.

If layer upon layer of major infrastructure development is allowed to continue, it could lead to an intolerable state of disproportionate infrastructure duress that goes way beyond mitigation or funding solutions and starts to erode the local community's human right to live

daily life without constant interference from the disruption of years of ongoing construction all around them. All the Developers of East Suffolk's multiple NSIPs, including the SWRTS project, should work together to ensure a coordinated approach to reviewing the local community's lived experience of stress and anxiety and should develop a pre-emptive plan of action ready to deal with any health and wellbeing issues that arise.

Socioeconomics and Adverse Impacts on Tourism:

East Suffolk is unique in terms of what it offers, from its National Landscapes and tranquillity to its thriving arts scene and much, much more. It is dependent on nature-based environmental tourism for its very economy and it is self-evident that the adverse impacts of construction of SZC, EA2 and the NGET connection hub are already having a profound negative effect on this. Construction of the SWRT project will further compound this adverse effect and this will have to be carefully monitored: if impact avoidance or minimisation cannot be achieved, mitigation and compensation will have to be provided.

Traffic, Access and Local Road Maintenance:

Construction related to SZC on East Suffolk's constrained rural road network has already been extremely impactful. Roadworks have become part of life, journey times are often extended and always unpredictable, road closures and diversions are commonplace with chaotic signage doing nothing to reduce disruption. Sideroads and verges have been damaged by inappropriate traffic flows, there are potholes everywhere, junctions that used to be manageable have become very tricky and so on and so forth. There is absolutely no doubt that SWRTS traffic and construction work taking place along the local road network will exacerbate these problems and great care will have to be taken to ensure that trenching for laying water pipes etc is properly coordinated with the roadworks of other projects. The PC would also like to see that roads, verges and landscapes that are disrupted during construction are fully returned to a pre-construction state when work is completed.

Workforce Accommodation:

The construction workforce for SZC will be in excess of 10,000 people and finding accommodation for this huge increase in numbers is extremely difficult. The housing market in East Suffolk has been skewed by this dramatic influx of people and many local tenants in the Leiston area have found themselves being forced out of their accommodation in order that higher paying SZC tenants can move in. The workforce of the SWRTS project will obviously be very small by comparison to that of SZC, but the important thing to recognise is that everything has to be considered in the light of the new baseline that SZC has brought about.

Local Council Workload:

The PC has been profoundly affected by the increase in workload that so many NSIPs being developed locally is creating. For example, the PC has had to increase the parish clerk's

hours from 4 hours to 5 hours per week (with the funding to cover this coming out of the council's budget rather than from the projects that are causing the increase in hours) and councillor workload has exploded with new-found roles including writing endless consultation responses, holding meetings to disseminate information to local residents, making representations at DCOs, attending multiple meetings, staying on top of writing emails to mention but a few. With so much going on, it is not uncommon to encounter diary clashes and competing deadlines and it is sometimes impossible to keep up with it all – which is what happened with the PC's response to the SWRTS project's pre-statutory consultation! This aspect of construction impacts needs to be added to the list of subjects being assessed by the EIA.

Conclusion:

It is imperative that all aspects of the SWRTS project are considered in the context of East Suffolk's increasing infrastructure burden. It is also critically important that Developers adopt a highly coordinated approach to all the projects cumulatively and that coordinated construction timelines are given the highest priority.