

# OTTERHAMPTON PARISH COUNCIL

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## **OTTERHAMPTON PARISH COUNCIL INITIAL COMMENTS TO THE IPC, JANUARY 2012 WITH REGARD TO THE EDF DCO APPLICATION FOR HINKLEY POINT C AND ASSOCIATED DEVELOPMENT.**

Otterhampton Parish Council is the elected representative body for the communities at Comwich, Steart and Otterhampton. As such we are a statutory consultee and have taken a leading role in consultations with EDF regarding their extensive proposals at Comwich Wharf and the Associated Development for laydown facilities at the nearby greenfield location. The Council look forward to where possible, assisting the IPC and their Commissioners in a thorough examination of EDF's proposals at Comwich.

EDF's current proposals at Comwich are extensive and varied. There are almost 2,000 pages in the application dealing directly with Comwich and many more with associated generic issues. Due to the complexity and huge range of the proposals, the Council will be requesting specific hearings take place, of sufficient duration, to fully examine the major developments at Comwich.

The Councils initial comments are meant as an indicator to assist the IPC as to which areas of concern we will be highlighting. It is understood there will be further opportunities to fully explain and expand our comments after January 23<sup>rd</sup> 2012.

The Council have strong objections to many of the proposals and are also reflecting the widely expressed views of our community.

At Comwich areas of concern and comment will include –

- Site selection for laydown facility, focusing on PPS 25 compliance, Satisfaction of Sequential Test requirements, Selection of search areas for the various aspects at Comwich, National Policy Statement (EN1) issues on flood risk and evidence required to show compliance, Third party involvement (as against the seemingly 'self-certification' evidence put forward in the Overarching Flood Risk Assessment Report (OFRAR)) including the Local Planning Authority and the Environment Agency. There is a wealth of evidence in previous EDF documents, when site selection was made, that directly conflict with the most recent reports. Any 'reasonably available' alternative sites (such as Hinkley Point etc.).

- The consequences of the poor site selection for the laydown facility at Comwich, due to the high flood risk area selected. - 10.1 hectare area raised to 7m AOD level and pile driven, with flood banks, requiring extensive road freight before the Cannington by-pass is built. At Stage 1 the total amount of material transported to build the Wharf and laydown facility was estimated at 124,000 tonnes, in February 2011 it increased to 317,000 tonnes, DCO Application total is now 933,000 tonnes. It is estimated this will involve 60,000 vehicle movements to build and 45,000 movements to remove.
- Use, construction and demolition of the lay-down facility. Note: it will take four years to return the lay-down area to green fields.
- Number of AIL's through Comwich. (Now believed to be at least 330 – not the constantly quoted 180) and the consequences for other uses of the Wharf and laydown facility. The timescale of construction of HPC and the role the AIL's will play.
- The use of the sea jetty at HPC for 'other goods' deliveries and storage of AIL's at the main HPC Site, including the potential use of Hinkley Point A (HPA) land and the old HPA turbine hall.
- Proposed 'Road freight use' at Comwich including permissions required, restrictions, level of use and operational hours.
- Road issues, including the Comwich and Otterhampton junctions, use and restrictions on the C182 and a Bridgwater By-Pass.
- Construction and use of the New Goods Wharf including other associated developments.
- New Berthing bed at the Wharf and it's design and permanence.
- The number, type and timing of deliveries to the Wharf. Previous use at Wharf.
- Issues affecting the village flood risk due to lowering the existing Wharf etc.
- The effects on 'Residential amenity', tranquillity issues, leisure use, noise, vibration, lighting and Access issues concerning Comwich Pill and the wider village community.
- EDF's 'red line' site boundaries at Comwich and their seeking of a lease from the Crown Estates for much of Comwich Pill with the consequent access, control and restriction of leisure use issues that arise.
- Restrictions on hours of use, mitigations, operations allowed, construction and operational issues, particularly now that EDF have finally admitted in the DCO Application that there will be unmitigated, significant, major adverse effects due to their proposed activities at Comwich, including night time use.
- Compensation both for individuals particularly adversely affected and the Comwich village community
- Consent by the IPC, regarding a defence against nuisance for operations at Comwich.
- Cumulative and Environmental concerns including visual amenity and wildlife designation.
- Traffic and transport concerns including the developments role in the Freight Management Strategy.
- Public safety concerns at Comwich Wharf and associated developments with regard to design and operation.
- EDF's 'Statement of Reasons' and the Justification, rationale and viability for the Comwich proposals.

The Parish Council will be seeking, in addition to the National Policy Statements, that the IPC should also be aware of and consider other local policies including the now adopted Sedgemoor District Councils Core Strategy, the relevant Supplementary Planning Document and local Parish / Community plans, when deciding their recommendations to the Secretary of State for the Application.

Whilst accepting that the AIL's will be imported through Combwich Wharf, the Council will be looking to the IPC to recommend 'Fair' hours of use and restrictions to take account of the impact on our small rural village which is primarily residential.

EDF are seeking to change Combwich Wharf into a large industrial facility. The wharf is closely surrounded on three sides by dwellings with a SPA (Special Protection Area) adjacent on the fourth. Despite the Wharf being constructed in the 1950's, there have been less than 50 deliveries in total since it was built.

Barry Leathwood.

Chair. Otterhampton Parish Council.