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Ed Miliband MP
Secretary of State
Department of Energy and Climate Change
3 Whitehall Place
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Dear Sir

SEVERN TIDAL POWER FEASIBILITY STUDY CONSULTATION

North Somerset Council welcomes the opportunity to respond at this mid-point of the feasibility study into options for using the Severn Estuary for energy production. We are keenly aware of the importance of addressing the contributors to climate change and securing a greater proportion of our energy from renewable sources. It is surprising that tidal power is given little, if any, credence in the Energy White Paper.

This study is of particular interest to this council because any delivered scheme would have a considerable impact on North Somerset both during and after construction. The council has responded to the consultation questions via the website link. In addition, we are writing to emphasise the issues that we agree to be of critical importance to this council and the communities we represent. We ask you to pay greater attention to these through the next stages in the study.

Commercial Shipping and Ports

The potential for negative impact on the ports of Avonmouth, Royal Portbury Dock and Sharpness is high. This is clearly acknowledged in the Regional Economic Assessment undertaken by DTZ. The ports are key contributors to the economic strength of the sub-region and also have a national significance, which benefits the residents of North Somerset and UK economy as a whole. Plans for expansion at Avonmouth are well-developed and we would ask that greater consideration is given to the role of the ports and safeguarding their current and future operations through appropriate mitigation measures.

Economy and Employment

Given that Bristol is the second UK city (after London) in the European league table of GDP, any impact on its economy would have a disproportionately large effect on the region and the wider UK economy. We consider that a much greater understanding of the economic impacts of each proposal (including new technologies) is necessary before decision can be made.

Weston-super-Mare suffered considerable job losses during the 1990's, followed by an increase in house building. One result of this is extensive traffic problems caused by out-commuting, primarily to Bristol. This council has implemented a policy to ensure that all development in the town is employment-led, ensuring that the ratio of jobs to homes is increased.

We are concerned that the assumptions made in your studies regarding job creation and jobs lost are flawed. For example, whilst it could be argued that jobs might be created to service the additional tourists flocking to Burnham-on-Sea to use the water impounded by the Bridgwater Bay Lagoon, Weston-super-Mare would experience the opposite effect, thus compromising wider sustainability goals that help support mixed and balanced communities. Therefore the jobs lost in each of the options must be included in the calculations to assess the effect on North Somerset, the sub region and the region.

Environment

The Severn Estuary is a unique habitat and is protected by several international and national designations, as is some of the adjacent land. Other organisations are better equipped to comment on the issues relating to the specific biodiversity and ecological systems. However, we consider that the preservation of the special habitat and ecology associated with the great tidal range to be of particular importance. Additional weight should be given to the negative impact of reducing the tidal range.

Another concern is the sourcing of the construction materials and transportation to the site. A robust appraisal of the impact and true cost of construction must be undertaken in terms of environmental damage, carbon footprint and transportation costs.

Infrastructure and public services

During the construction phase the influx of plant, machinery and workers would impact on infrastructure and services, possibly to a critical degree. It is essential to include the provision of services and sufficient infrastructure to ensure that existing residents do not suffer reduced service. After construction phase, what will become of the additional infrastructure and services provided? An exit strategy must be clear to inform the decision-making at the end of this Study.

In conclusion, we strongly recommend that you:

- make full commitment to research new and innovative technology options that are less environmentally damaging;
- include such options in the list for further study;
- strengthen the robustness of the assumptions and calculations prior to decision-making;
- pay particular attention to the importance of the West of England economy to the region and the sub-region;

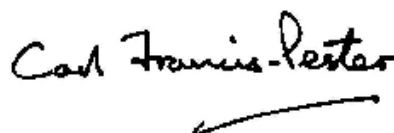
- fully understand the impact on acute areas of deprivation that persist in areas of south Bristol and Weston-super-Mare and do not compromise the actions being taken to create a more balanced and sustainable communities in these areas;
- investigate whether a range of other interventions would provide better return for the £20bn anticipated cost; and
- consider the role of tidal power from the Severn Estuary as part of the country's strategic energy choices (and not in isolation).

We look forward to the results of the study, at which time we will arrange a series of events to engage the residents of North Somerset in the consultation.

Yours faithfully



Councillor Elfan Ap Rees
Executive Member for Strategic Planning,
Highways and Economic Development



Councillor Carl Francis-Pester
Executive Member for Environment

Cc: Mike O'Brien - Minister of State