



Summary of Written Representation on Sizewell C DCO application September 2020 and Changes January 2021

1.0 Introduction

- Felixstowe Town Council (FTC) takes no stance of principle in relation to nuclear power generally, or whether the coastal site at Sizewell may be an appropriate location.
- FTC challenges the validity of the Transport Assessment (TA) in view of the lack of data on freight volumes, types and sources, and hence the modal split proposed.
- FTC has concerns arising from the TA on the rail strategy in relation to available rail freight capacity, LGV and HGV traffic in the southern part of East Suffolk and the proposed access route to and from the Freight Management Facility.
- FTC accordingly proposes that a new marine dimension of containerisation should be considered and fully investigated.
- FTC records potential concerns, and hence a possibility to be heard at Hearings on tourism, the labour market, housing issues and coastal processes.

2.0 The Transport Assessment (Original and Revised)

- The TA has insufficient data on the freight volumes and modes to justify the chosen Freight Strategy.
- Containerization is mentioned once in the headlines of the TA, but nowhere else and is effectively excluded as a transport mode.
- The effective assumption throughout is that only bulk materials such as aggregates and similar are candidates for rail or sea delivery, and that all other goods must go via road on HGVs or LGVs. We submit that that is a deeply flawed misconception.
- The ExA is therefore asked to request EDF to fully examine this possibility of containerisation for incorporation into the final Order, to the benefit of many communities in the entire area south of the SZC site.

3.0 Rail Strategy

- FTC queries the validity of the Rail Strategy in the face of the current absence of any unused freight capacity on the national rail network south and west of Ipswich.
- FTC is concerned therefore that the potential use by SZC of between 2 and 4 additional rail freight paths can be achieved only at the expense of capacity currently critical to the Port of Felixstowe, of both local and national significance.

- The history and current operation of rail freight to the port is analysed as evidence of the above, including critically the ongoing delays in Network Rail's proposals for increased capacity at Ely junction, now expected to be in 2028/9 at the earliest.
- FTC suggests that the wider Nationally Significant Infrastructure Projects objectives for the UK should be the driving policy factor in the ExA's decision on this issue.

4.0 Effects on the main road network

- FTC is concerned that SZC traffic will cause significant delays on the limited access routes to Felixstowe, notably at A14 Junction 58 Seven Hills Roundabout and the nearby Crematorium junction on the A1156
- FTC queries the assumptions made that the relatively small percentage increases in numbers of traffic movements will not create delays, given that the network is currently predicted to be overloaded within the SZC construction timescale.
- FTC therefore suggests that the SZC project should contribute finance to more extensive improvements than currently proposed in relation to local residential developments.
- In relation to the proposed Crematorium junction on the A156, issues there could arise, beyond congestion, to it being a potentially dangerous accident site.

5.0 The Freight Management Facility

- FTC support the principle of the FMF and of HGV management, given the success of a similar concept in relation to past experiences with HGV congestion around the Port of Felixstowe
- FTC takes no view on the suitability of the site chosen.
- However, FTC strongly suggests that the proposed access route is not the most appropriate.

6.0 The Proposed Access Route to the Freight Management Facility

- FtC proposes an alternative access route to the FMF and makes detail suggestions as to its operation.
- FTC analyses the proposed and alternative routes in relation to "Traffic Conflicts" in each case, suggesting that these would be reduced from 5 to 2 by the alternative route.
- Maps are included clearly illustrating the above.

7.0 SZC Transport Strategy – an additional marine dimension?

- FTC proposes in some detail that a new approach using marine containerised deliveries to the SZC site is both feasible and desirable
- That opportunity has been created by the evolving proposals for a much enlarged Beach Landing Facility "jetty" extending some 400m to water of 6m or more in depth.

- FTC suggests that such an approach could be efficient and cost effective, while offering major benefits to all communities on the A12 concerned about the proposed LGV and HGV flows.
- A number of specific potential issues in relation to this concept are outlined and briefly analysed
- FTC therefore strongly requests that the ExA request EDF to fully analyse this proposal and consider its adoption.

Further detailed notes are provided on a range of connected issues.