



Saxmundham Town Council response to Planning Inspectorate on Sizewell C: Post Hearing submissions including written submissions of oral case

Saxmundham Town Council (STC) invites the Inspectorate to consider the effects of construction on local transport systems (road and rail), our local infrastructure, degradation of the local environment and wider socio-economic impacts.

Saxmundham is a growing and changing Town of over 4,000 residents, and faces many strains on our existing resources, connectivity and social capital. Our uniqueness stems from our geography, setting and market town heritage. As a key hub served by rail and the A12 we have welcomed change, but resisted over-development. STC's position on Sizewell C, clear in our many submissions to EDF, is not based on ideology but on extensive consultation with the local community and rigorous assessment of the costs, benefits, risks and impacts for the Town both in the short and long-term.

STC's July 2020 meeting passed a resolution opposing development of the Sizewell C Nuclear Power Station as presently proposed; see appendix. We have been concerned about EDF's poor engagement with our community, having only met with us in early March this year, via a single Zoom meeting with STC's Chairman and Clerk..

A particular concern is that EDF have taken no account of East Suffolk's District Council's (ESDC) development plan for the proposed Saxmundham Garden Neighbourhood, and we also note that EDF makes no specific response to our concerns in the document **EN010012-003958-Sizewell C Project** despite our having responded to them at every stage of the consultation process. In addition, EDF were unable to respond to any of the points made at the open floor hearings. We therefore reference our previous responses to the consultations in this submission so that EDF may register their comments to the points we have previously made.

As we understand the Inspectorate's function when considering any proposed energy infrastructure development, and when weighing its adverse impacts against benefits, it should take into account:

*"potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts."*¹

*"the IPC must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent it is satisfied that to do so would result in adverse impacts from the development outweighing the benefits. The fact that a site is identified as potentially suitable within this NPS does not prevent the impacts being considered greater than the benefits".*²

In this context of cumulative impact, 5 factors highlighted in our previous submissions to EDF lead us to ask the Planning Inspectorate to **reject** consent for EDF's application.

Transport

1) Starting with **rail strategy**, pre-Covid East Suffolk line had significant capacity issues with regular delays related to the line not being fully dual-tracked (although the Beccles loop has improved it). As the line cuts through the town centre and adjacent to a dense housing area

¹ Overarching National Policy Statement for Energy (EN-1)

² National Policy Statement for Nuclear Power Generation (EN-6)

(eg Albion Street, next to the station), STC is concerned about the impact of 8 nightly freight runs and the consequent noise and nuisance to residents. Also STC is unsure whether EDF has taken account of the new residential construction in the town as the map shown in their Environmental Statement is outdated and does not show the additional housing to the north-east of Street Farm Road, some of which is close to the track and the branch line off to Leiston.³ Additionally, there are several older buildings in the town, including grade 2 listed properties, that may be put at risk from damage by vibrations from heavily laden freight trucks.⁴

STC has always welcomed the use of rail as an alternative to road transport, if the development were to go ahead, but this was on the proviso that there would be an upgrade to the East Suffolk Line to allow rail freight to be moved during the day. This upgrade would have provided long-term benefit to the area with the promise of more regular rail services. The issue of night time freight has already been the subject of correspondence between residents and STC, some of which was submitted to EDF during the consultations. The potential wellbeing impacts to residents living near to the track could be significant over a ten to twelve year construction period.

2) **Road.** The minimal changes proposed to the road network under EDF's road strategy provide little mitigation for traffic issues and flow around Saxmundham, nor do they take into account that (under the District Council's new Local Plan) some 800 new houses are to be built over the next 5 – 10 years from the railway across to the A12 on the Town's southern boundary. There will be at least one additional roundabout on the A12 serving the new development on both sides of the A12, making congestion a certainty. This has not been taken into account by the promoters of Sizewell C, who were unaware of these development and highway proposals. A worst-case scenario is that the additional traffic capacity from the A12 as a consequence of construction will settle on Saxmundham as a "rat-run", adding to an existing problem of traffic flow through a narrow high street with narrow pavements. The road-led strategy will also complicate and obstruct local private and farm traffic, and may close roads that locals use to reach Saxmundham from neighbouring villages.

Whilst some A12 issues have been partially addressed in the proposals for the pinch-points some miles north and south of Saxmundham (i.e., proposals on the link road and Theberton bypass to the north, and the 2 villages bypass to the south), the impact on Saxmundham itself and its adjoining roads has been ignored. Sizewell traffic will lead to increased waiting times for traffic wishing to leave or enter the town via the B1119. This junction has already been the site of several major accidents, leading to a change in priority at the junction. Increases in traffic may lead to greater accident frequency, together with increased road casualties and closures of the A12 while accident scenes are examined. So a question for EDF needs to address is where does their construction traffic go when there are road closures for whatever reason? Saxmundham is ill-equipped to deal with the volumes of traffic that currently use the A12 and alternative routes are even more unsuitable

Housing, infrastructure and economy

3) STC are concerned about what the consequences will be for **local housing and infrastructure**, including impact on local services in Saxmundham. We anticipate 200 additional workers with families in Saxmundham which will have an impact on housing costs and local prices. Saxmundham is not the most prosperous East Suffolk Town and has some residents on low incomes who will be affected by the influx of better paid Sizewell workers to the town; with potentially increased rents some may be forced to move out of the area. House prices may also increase and this will shut out the poorer paid from the housing market in the town which has traditionally been one of the lower cost areas. Secondly, EDF's

³ Environmental Statement Addendum Volume 3: Environmental Statement Addendum Appendices Chapter 9 Rail Appendices 9.3.A-E Noise and Vibration Part 2 of 2"

⁴ Staffordshire Moorlands Noise and Vibration Guide

<http://publicaccess.staffs Moorlands.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=82975>

lack of reference to the ESDC Local Plan and housing/land allocation suggests a lack of joined-up thinking on planning and infrastructure.

With a concentration of new workers in Saxmundham and nearby Theberton, STC is concerned about the extra burden on our schools, GP surgery, and other services (children's centre, library, youth support, leisure and recreation) all of which have been issues that STC has grappled with, recognising the need for improvement. STC notes with concern that there is no specific mention of the town within the draft section 106 agreement.⁵ Given the previously noted impacts upon its residents, we would like this omission to be examined and rectified. Finally there are implications for local policing, community safety and dealing with anti-social behaviour.

4) Local Tourism and the economy. STC have been working hard to position Saxmundham as the gateway and hub for the Suffolk 'heritage coast'. The visitor economy is a huge driver for our area's micro- and small business sector - visitors will be driven away by eyesores, closed footpaths and beaches, disruption, noise and pollution, with an estimated loss £210m in annual tourism to the AONB.

Points 3 and 4 lead us to consider the wider socio-economic impacts for Saxmundham and its surrounding environment. Will the additional jobs benefit local people? In our view the promised economic benefits for the local economy will be limited by EDF's intended use of the Hinkley supply chain, imported labour and inadequate level of appropriate skills locally to benefit from opportunities in the industry.

Environmental concerns

5) Environment. Finally, we have strong concerns about the degradation of environment of the Sizewell area which will be felt beyond the immediate site; the Inspectorate will have heard representations about the impact on the coastal resilience, and climate change factors and flood risks, as well as the impact for Suffolk Coast and Heaths AONB & Minsmere, but further inland towards Saxmundham the impacts will also be felt for footpaths and cycling routes, roadside verges, watercourse and drainage systems.

⁵ reference EN010012-003959-Sizewell C Project