

## **APPENDICIES**

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### **Saxmundham Town Council Resolution**

Saxmundham Town Council notes that EDF submitted application for the Sizewell C nuclear power plant for planning consent on May 26th, and that the UK Planning Inspectorate on 24th June accepted for examination the planning application for the Sizewell C nuclear power plant. Council is concerned about pursuing the application at a time when community engagement and consultation are difficult, and notes that:

- 1) The Town Council has taken part in all stages of the EDF consultation; at each stage we have raised significant issues about the unacceptable environmental and social costs to the town and area, but very little about the development proposals has changed, and there have been significant gaps of information in the documentation provided.
- 2) Other Councils and local stakeholders have raised similar concerns in respect of the environmental and social costs and risks, the huge disruption and burden on local services, the importance of preserving our unique heritage coast, the detrimental impact on wildlife and ecology particularly in the Suffolk Coast and Heaths AONB, and the potential damage to our existing local economy including tourism.
- 3) The national debate on energy has also moved on significantly since the project was first announced in 2009/10 with greater focus on the potential of renewable energy sources; this is also relevant given the long life-cycle of the project (projected completion and first generation dates of Sizewell C now being in the early to mid-2030s).

Saxmundham Town Council is therefore opposed to the development of the Sizewell C Nuclear Power Station as presently proposed

## **SAXMUNDHAM TOWN COUNCIL: RESPONSE TO SIZEWELL C STAGE 4 CONSULTATION**



Saxmundham is a relatively small market town with a population of over 4,000. It is located on the A12 mid-way between Ipswich and Lowestoft and about seven miles west of Sizewell. The Local Plan envisages Saxmundham growing in size by approximately 50% over the next ten years and this will give significant challenges to the town which currently lacks the infrastructure required to support this increase.

## Summary

- Saxmundham Town Council (STC) does not take a position on civil nuclear energy as such, but has continuing concerns about the suitability of a new Nuclear Power Station in the centre of an area of outstanding beauty. These concerns have not yet been adequately addressed either by EDF or by central government. STC also has concerns about the financial viability of the development and running by EDF of Sizewell C.
- STC is disappointed that the option of a 'marine-led' or 'marine-contributing' transport strategy has not been brought back for consideration, without adequate evidence or justification thus far, since potentially it may have many advantages.
- It considers that, subject to our point on a marine strategy, a rail-led approach is the next best option as this will provide a lasting legacy for East Suffolk and help to mitigate the expected increased A12 road traffic.
- It reiterates its Stage 3 position that, given the volume of construction materials (and people), and the inadequacy of Suffolk Coastal's existing transport infrastructure, it is clear that there needs to be a multi-modal approach to getting materials to the construction site, including by rail, road and by sea.
- A road-led strategy is unacceptable as it would put excessive strain on the highway network, and in particular affect the Saxmundham area.
- STC supports using rail to a large extent, provided there are major improvements to the line including double-tracking or at least more than one passing loop on the line between Ipswich and Saxmundham.
- It is deeply concerned about the impact on our community of any strategy which will result in overnight freight trains passing through our quiet town for the entire period of the construction.
- The newly proposed "integrated strategy" – in the form here put forward - is wholly unacceptable. It would involve substantial rail and road freight movements, but (at para 2.5.4.) would involve "the exception of the upgrades to the East Suffolk line." This would be a cheap, shabby option causing the maximum disruption as passenger and freight movements would have to co-exist for over a decade without any new passing loop or other improvement. We

are surprised and dismayed at this proposal which is the negation of proper planning.

- STC notes that Essex and Suffolk Water has been so far unable to identify the source of the 2 million litres of potable water that will be necessary to keep the plant operational.
- The Town Council is disappointed that EDF did not consider it necessary to hold a Stage 4 consultation in the town, despite the major impact that it will have on our community.
- STC considers that a new southern route (south of Saxmundham) would mitigate many of the issues that will arise should a road-led or integrated approach be adopted. This will also be helpful for the other major projects which are planned in the area.

## **Q1 What are your views on EDF Energy's proposals to build new nuclear power stations (Sizewell C & D) and associated development?**

Saxmundham Town Council (STC) has not taken a position on the general question of support for or opposition to nuclear power, on which our residents have differing views. We understand and support the need, in coming decades, for non-carbon-based energy sources, which can be provided via different means.

We do have concerns about the siting of new nuclear reactors in an area of outstanding natural beauty. The proposed site suffers from a lack of infrastructure and is on a coast that is subject to frequent erosion. The rate of erosion can only increase in frequency and unpredictability as climate change continues and the consequences, including rapidly rising sea levels as the century progresses, may be increasingly severe

EDF owns other nuclear power station sites which appear to have much better transport links and which are not within such a sensitive environmental area. These sites should be considered in preference to the destruction that will result from further development of the Sizewell site. We share the concerns of the Royal Society for the Protection of Birds (RSPB) about the potential impact on Minsmere, the local wildlife and the environment of the proposed development of the new Sizewell site.

There appears to be little or no communication and coordination between EDF and the owners of other energy projects such as the proposed SPR Friston substation and the National Grid European Interconnectors project. These three projects together must be taken as a whole and the best solution found for them.

Despite years of discussion, there is still no plan for the long-term storage and disposal of the nuclear waste. This is 'to be stored at Sizewell' until a permanent solution is found, possibly even after Sizewell C & D have been decommissioned.

We have concerns about the economic viability of the Sizewell C and Hinkley Point sites, having regard to EDF's overall financial position. We note the report in the Financial Times of 25<sup>th</sup> September, which informs that the cost of Hinkley Point is due to increase by £2.9 billion beyond previous estimate, which is an increase of over 10%, with a further delay in opening, which is said to be due to "challenging ground conditions". The same report notes the fall this year in EDF's share price of over 25%, and that it is planned to put all of EDF's nuclear facilities into a new company wholly owned by the French government, "aimed at taking pressure off EDF's balance sheet, which is weighed down by nuclear liabilities".

Having expressed our major concerns and doubts, if Sizewell C does in the event proceed, we will be committed to ensuring that Saxmundham makes a positive contribution, as a nearby service centre town and potential site for related firms and employment, but also seek to ensure the maximum protection for our town and citizens from any negative impacts, notably during the construction phase.

Although we would welcome the new job opportunities and investment that the new power station would bring to the town, we are concerned at the potential significant disruption to the businesses and people who live and work in the area.

No source has yet been identified for the two million of litres of potable freshwater that will be required every day for the cooling pond and for the reactors. Essex and Suffolk Water is unable to source additional water as it has acknowledged in its draft 2019 Water Resource Management Plan. This has been confirmed by the Environment Agency which states “The confined chalk groundwater in the East Suffolk area is fully committed and no further consumptive abstraction can be considered”. This shortage will be further exacerbated by the Suffolk Coastal draft Local Plan which envisages an additional 10,500 homes in the area by 2036.

The government has consulted on the siting of new nuclear power stations and cites a mixture of discretionary and exclusionary reasons why a site may be excluded as suitable for a site. In the case of a new station at Sizewell, reasons for considering exclusion would be:

- Flooding, and Storm Surge
- Coastal Processes
- Internationally Designated Sites of Ecological Importance
- Nationally Designated Sites of Ecological Importance
- Areas of Amenity and Landscape Value
- Size of Site to Accommodate Operation
- Access to Suitable Sources of Cooling
- Significant Infrastructure/Resources

## **Q2 What are your views on the proposed changes to the main development site?**

STC supports Aldeburgh Town Council (ATC) in that the buildings on the site should, as far as possible, blend in with the existing Sizewell B reactor and the design should provide a non-intrusive or architecturally positive visual impact on the AONB.

It also shares the concerns of ATC and the RSPB regarding environmental disturbances due to light, noise and air pollution. It notes

that the loss of 'dark skies' around the Darsham and Westleton area will be a significant issue for local people, particularly those who take advantage of this to carry out their astronomy.

STC supports the views of Leiston Town Council (LTC) on the lack of size of the proposed development site.

It agrees with the submission from Theberton and Eastbridge Action Group on Sizewell which, along with other responses, favours a bridge across the SSSI rather than the proposed causeway.

### **Q3 What are your Views on the use of pylons to export electricity to the National Grid substation?**

STC supports ATC and LTC along with other responders to the Stage 3 consultation that the use of overhead pylons is an unacceptable intrusion into an area of outstanding natural beauty. The thousands of tourists who visit the area every year will be dismayed by EDF's failure to come up with a solution which will obviate the use of these pylons. Although it is welcome that the height of the pylons can be reduced, this is no substitute for the cables being run underground.

### **Q4 What are your views on the Freight Management Facility?**

As Saxmundham is not directly affected by the siting of the Freight Management Facility, we will not comment directly on the two options. However, we do support Friends of the Earth's statement in their Stage 3 response concerning the loss of higher-level Stewardship land should the Innocence Farm option be chosen.



## **Q5 What are your views on the Transport: movement of freight?**

Saxmundham Town Council has already made its views clear on the Road and Rail-led options in response to the Stage 3 consultation and these views stand:

“Given the volume of construction materials (and people), and the inadequacy of Suffolk Coastal’s existing transport infrastructure, it is clear that there needs to be a multi-modal approach to getting materials to the construction site, including by rail, road and by sea.”

A ‘road only’ strategy would put undue pressure on the highway network, in particular around Saxmundham (see below). A ‘rail-led’ strategy would put at risk the delivery of passenger services, unless at least a far more ambitious programme of double-tracking of the East Suffolk Line were to be included, which we believe is essential, but requires partnership between central government, Network Rail and rail operators, and EDF to find the solution. A single passing loop is a totally unacceptable solution, as it will (a) lead to frequent problems and serious delays for both passenger and freight trains with only one possible passing place, and (b) mean that fewer day-time freight trains could pass, leading to more night-time freight trains through the town.

We wish indeed to reiterate our strong concerns about the overnight movement of freight through the town and surrounding communities. The railway passes through the centre of Saxmundham, including a strongly residential area, and can be heard in most parts of the town. The impact on peoples’ lives cannot be overestimated, particularly during the summer months when it is natural to leave windows open. These comments from our residents are representative:

“I have just learned that the Sizewell C development would involve a large number of heavy goods trains passing between 11.30pm and 6am every night for around 10 years. This is very concerning for us as the prospect is no sleep and ensuing mental and physical health issues. The house shakes just with the passing of the small passenger trains each hour in the day, so the prospect of damage to the house itself is also a

great worry. Quality of life would decrease to a huge extent for us and anyone who happens to live close to the tracks.”

“The disruption and sleep disturbance to all the residents along this stretch of line would be intolerable. It is not just for a few weeks or months but for 12 years”.

STC, along with other local councils, would still wish to consider a marine-led strategy (or strategy with significant marine component) and is not satisfied that EDF has explored this option in sufficient detail. Certainly the information to date does not establish that the marine option should be excluded.

In the local plan drawn up by East Suffolk District Council, Saxmundham is planned to have an additional 800 houses, mainly by the side of the A12 to the south of the town. The sole access to this ‘garden neighbourhood’ will be from the A12, to include construction of a new roundabout not taken into account in your consultation document. The impact of this additional traffic, together with the hundreds of HGV movements and other Sizewell vehicles, will massively overload this part of the A12 at certain times of day.

The newly proposed “integrated strategy” – in the form here put forward - is wholly unacceptable. It would involve substantial rail and road freight movements, but (at para 2.5.4.) would involve “the exception of the upgrades to the East Suffolk line.”

This would be a cheap, shabby option causing the maximum disruption as passenger and freight movements would have to co-exist for over a decade without any new passing loop or other improvement. We are surprised and dismayed at this proposal which is the negation of proper planning.

## **Q6 Transport: What are your views on the Sizewell Link road and the Theberton bypass?**

The Town Council has not changed its opinion on the suitability of the Theberton bypass or the Sizewell Link road but it urges EDF to take notice of the concerns raised by communities that will be impacted by either or both of those road schemes.

Air quality monitoring has been carried out at the traffic lights in the centre of Saxmundham and this has demonstrated that daytime levels of nitrogen dioxide already exceed the EU recommended levels. Levels of particulate matter are also of concern. EDF must carry out detailed air quality modelling, bearing in mind that additional traffic is likely to take the direct Saxmundham – Leiston route. It must also include the traffic which will come from the new estate which will be accessible only from the A12.

It continues to urge EDF to consider a southern route to the site before reaching Saxmundham, particularly bearing in mind the other large projects which are being considered in the area. It would also like to point out that, as most of the traffic is postulated to come from the South, there will be a significant impact on the single lane Saxmundham bypass. The ability of that road to take the additional traffic plus vehicles entering and exiting the new Saxmundham ‘garden neighbourhood’ must be examined in more detail than has been done so far.

## **Q7 What are your views on the road improvements?**

Saxmundham Town Council notes the minor changes to the A12/B1119 junction but urges EDF to work with the district and county councils to provide a longer term solution for both the additional Sizewell traffic and the proposed ‘garden neighbourhood’ to the south of the town and the employment area to the west of the A12.

The town council has no specific comments on the other road improvements but supports the views of those councils that are directly affected by those changes.

## **Q8 What are your views on Sizewell Halt or rail siding or spur at LEEIE for early years?**

Saxmundham Town Council supports the views of Leiston Town Council in respect of these matters.

### **Q9 What are your views on the amended proposals for the Northern and Southern Park and Rides?**

Saxmundham Town Council supports the idea of the Park and Rides to reduce the amount of traffic accessing the construction site. It urges EDF to listen to the concerns of Wickham Market Parish Council and its associated communities and those of Darsham Parish Council when coming up with a final plan for those facilities. It expects EDF to minimise any impact on the local communities in its plans.

### **Q10 What are your views on the Consultation Process?**

Saxmundham Town Council is concerned that EDF did not hold a consultation session for Stage 4 in the town, which will be very significantly affected by the development if it proceeds. STC would like to know why it was not considered necessary to seek the views of Saxmundham residents, some of whom have already made their feelings known to the council on this option. The consultation process cannot be considered to be successful if it does not give local people the chance to contribute their opinions on such an important project.

The town council is also concerned about the lack of feedback from previous stages of the consultation and the unwillingness of EDF to amend its plans in the light of adverse comments from the local community.

Finally, it is critical of the lack of environmental assessment that has so far been carried out and wonders how this work can be done in time to meet EDF's target submission date for the DCO of the first quarter of 2020. It wishes to see something more substantive than a box-ticking exercise for an area of the country which contains such outstanding environmental assets.

### **Q11 Stage 3 Consultation**

Saxmundham Town Council's views have not substantively changed with respect to the Stage 3 consultation and any changes have been incorporated in our response to the Stage 4 process.

## SAXMUNDHAM TOWN COUNCIL: RESPONSE TO SIZEWELL C STAGE 3 CONSULTATION



Saxmundham is a small market town with a population of approximately 4,000. It is located on the A12 mid-way between Ipswich and Lowestoft and about seven miles west of Sizewell.



## **Saxmundham Town Council – Draft consultation response on Sizewell C (Stage 3).**

### **Introduction – General issues for Saxmundham**

This is the third consultation on EDF's proposals to develop Sizewell C. It follows a similar formula to consultation stages 1 and 2 of presenting - often in the form of leading questions - EDF's preferred or prescribed 'options' for managing construction of Sizewell C and associated developments and sites, including an accommodation campus, transport by road (with park and ride facilities), rail and sea, and mitigating impact on the landscape and seascape character and ecology.

We acknowledge that there have been some welcome modifications over the course of the three consultations, however the core of EDF's approach has remained unchanged, and the solutions to known problems offered by EDF continue to be minimalist. On all the significant issues around transport, accommodation, environment and infrastructure there is widespread disappointment that EDF have again failed to grasp the scale of the challenges that Saxmundham and neighbouring communities will experience as a result of this major energy project should planning consent be granted and the project go ahead. We find ourselves making the same points that, given the size and strategic importance of the project, there must be some beneficial material and community legacy offered to address these issues including the provision of adequate infrastructure and services to meet the continuing requirements of the project, enhance the local economy and prosperity, and protect the environmental and heritage value of the Suffolk Coast area.

Also missing from the consultation process is any strategic joining up of the different plans, projects and agendas that private and public bodies are pursuing across the East Suffolk area. So, for example the District Council's Local Plan sets out expected growth levels and designated housing and business development areas over the next 20 years, but scarcely mentions Sizewell C. EDF's consultation likewise makes no reference to the Local Plan. Also relevant are Scottish Power's proposals for the construction of new substations to connect off-coast windfarms with the national grid, and related 'interconnector' and pylon projects. Although not of the scale of Sizewell C, these too will have a significant impact on transport, the local environment and landscape. Other agencies from Councils, Highways, to Network Rail, the Environment Agency, NHS and Suffolk's Police and Crime Commissioner are failing to plan for the long-term business, demographic and ecosystem changes that can be anticipated. Even East Anglia's LEP (Local Enterprise Partnership) does not appear to be a strongly present strategic partner in this process. Last but not least, we would like to see EDF pay greater attention the priorities of the community-led development frameworks of Town and Neighbourhood plans and processes. Details on Saxmundham's Neighbourhood Plan process can be found at <http://www.saxplan.org/>

As with previous responses, it is not for our Town Council to take a 'for' or 'against' position on the development of additional nuclear power generating capacity at Sizewell in principle, or comment in detail on matters of national energy policy. However profound concerns remain in the community that some of the longer-term implications and impacts, social and environmental, have not been fully thought through. Specific concerns we raise in this response with reference to Saxmundham include:

- Impact on transport, especially the adequacy of existing road and rail networks.
- Impact for Saxmundham's already over-stretched amenities and services from a large influx of labour.
- Impact of EDF's accommodation strategy.

- Environmental impacts.

**Question 1: What are your views on EDF Energy's proposals to build a new nuclear power station, Sizewell C, and associated development**

As above we feel that as a Town Council it would be inappropriate, or rather beyond our immediate remit, to take a clear single position on the overall desirability of EDF Energy's proposals to develop Sizewell C as a National Strategic Infrastructure Project. Our Councillors and residents have differing views on the broader core policy, energy and environmental issues and questions related to new nuclear power generation capacity and facilities. It is fair to say however that there are significant concerns and frustrations about the quality of public information and engagement from EDF, Government and public authorities responsible for infrastructure and public planning, and the scale and proposed development. Above all there are concerns about the lasting impacts for the local area, both environmental and economic. These include the potential impact on roads, tourism and the surrounding landscape.

Sizewell C is a massive £14 billion project with ambitions to eventually generate electrical capacity of approximately 3,260 megawatts to meet up to seven per cent of the UK's electricity needs, or the equivalent of supplying approximately five million homes. The project to date has been chequered by concerns of financial resilience and commercial viability, delays, over-runs, safety concerns in the light of regulators' decisions about 12 of EDF's existing reactors, and uncertainties over future arrangements (post-Euratom) for regulation of the nuclear industry. Broader questions overshadow the proposals about whether this project is still appropriate given that it will not generate any new electricity until around the end of the next decade. This is long after the predicted shortfall in electricity supply, and there will be a high guaranteed "strike price" of its proposed output (roughly double the current wholesale price of power) – effectively subsidised by UK bill payers and taxpayers. Other concerns include ever greater accumulation of high levels of dangerous waste with no permanent disposal method yet discovered, contamination risks, and potential security risks given the geo-political context of EDF's investment partners.

We do acknowledge though the basis on which Government supports the project as an alternative to high-carbon fossil fuel reliance. We accept also in principle that if national decision-makers are wedded to the delivery of new nuclear capacity as part of the UK's future energy strategy, then it may be better that new nuclear power stations are constructed at sites already used for this purpose as this approach is more compatible with principles of sustainable development, provided that appropriate measures are taken to mitigate any adverse impacts on the local environment, ecology and communities.

Sizewell C will have massive implications for our community, for the local economy, for local services, and will have long term impacts for the ecology, demography and economic geography of the whole area. Construction over a 10-year period will be hugely disruptive to community life and have adverse environmental, amenity and traffic impacts. It will impact on coastal processes and groundwater, local agriculture as well as a wide range of birds, animals and plants, threatening at least two Sites of Special Scientific Interest including the nationally treasured Minsmere Reserve and several aspects of local heritage. Key industries in East Suffolk like tourism and hospitality will be especially impacted, along with the area's perceived attributes and assets of tranquillity, unspoilt coast and beaches, marsh landscapes and heritage sites, which give a distinct identity and attractiveness for visitors and newcomers. Saxmundham is a "gateway" to the Suffolk heritage coast, and a growing Town with pressures and strains on infrastructure and services which will accelerate significantly should Sizewell C move into construction stage.

That is not to say that we are unaware of the benefits, opportunities and legacy outcomes that EDF's proposals for Sizewell C could bring to our area and communities, including opportunities for local jobs and for local businesses engaging with the supply chain and attracting new skills. But with awareness of these opportunities there needs to be awareness of risks, and the risks associated with nuclear energy projects are considerable. There have been 23 accidents involving reactor core meltdowns among the world's 443 nuclear power plants; serious and fatal incidents like Chernobyl or Fukushima are an ever-present possibility.

Our duty as a Town Council is to ensure that the range of risk-related concerns within the community are expressed robustly, whilst also putting the case for appropriate mitigation measures to deal with the many challenges that this community faces as a consequence of these proposals, and to seek the best outcomes in terms of local opportunities and sustainable growth.

### **Question 2: What are your views on our proposals for the main development site?**

A construction project of this magnitude and duration will inevitably involve significant disturbance and displacement. All activity and construction though should be as compliant as possible with the overarching principles of sustainable development i.e. meeting the needs of the present without compromising the ability of future generations to meet their own needs. Where the development is temporary (construction site facilities) every effort should be made for the land to be restored to its previous use at the end of the construction phase of the project.

This development would be taking place in an ecologically important and sensitive landscape, the main development site occupying 305 hectares. Development of this scale in such a sensitive location will have major impacts upon biodiversity. The threat to our precious wildlife sites is of deep concern to the whole community, both for people in Saxmundham and in all our neighbouring parishes. On the Sizewell estate there are no less than 28 Biodiversity Action Plan species, all dependent on the mosaic of very special habitats, most with European regulated designations. The plans include building directly on the north-east triangle of the Sizewell Marshes Site of Special Scientific Interest (SSSI) with a complex water management system, as well as impacting on surrounding wildlife and heritage assets.

There are also potentially wider environmental impacts which are difficult for us to take a view on as even at this stage. EDF have failed to prepare or publish an environmental impact assessment (EIA). Potential impacts that have been identified by independent experts though include greater potential exposure to coastal erosion, inland flooding, and changes to the coastal process. The Suffolk coast has always been exposed to considerable erosion by the North Sea, as evidenced by the destruction of Dunwich and major floods more recently including 1938, 1953, 2006, 2007 and 2013, when storm surges flooded Dingle marshes – and Minsmere. If sea levels continue to rise over the longer term, the entire power station site could become an island. In this case, north-east winds will blow the sea directly onto the site, unprotected by any beach shingle. The consultation claims that there will be minimal to no impact on the Minsmere coastal frontage and maintains that changes in this very dynamic coastline will be down to natural processes rather than the proposed development. No evidence is provided to back these claims.

The proposed causeway over the SSSI was the cheapest option proposed at the Stage 2 Consultation and this option would have the most negative environmental impact on the flora, and in particular the fauna, of the area. There is also real concern that the build will impact ground water levels with consequences extending far beyond the site.



Finally, the environmental impacts also need to be looked at within the context of the wider economic effects, which we will explore further in our answer to the next question. Although not a seaside town, Saxmundham is the "gateway" town for Suffolk's heritage coast, due in particular to its busy rail station. Its proximity to the coast means that residents and visitors enjoy excellent access to the amenities offered by having the coastline so close. This includes access to the beach for recreation including walking, dog walking, and swimming. So, the impact on current amenities, combined with the impacts from the additional traffic associated with the proposed development of Sizewell C, are among the major concerns for residents.

In consideration of these issues it would be preferable if EDF looked at options for scaling back the size and scale of the development area such as a structure that might be designed to accommodate one rather than two new reactors. We note that Sizewell A which is being decommissioned is not included in these plans – one solution to reducing the land take could be to use some of Sizewell A's land and facilities (including potentially for worker accommodation). The proposed measures in respect of environmental concerns raised at stages 1 and 2 remain unspecific and are described as "appropriate mitigation measures". It is disappointing that seven years on from initial consultations, so little detail is shared.

**Question 3. Do you have any proposals on our people and economy proposals, including our approach to education, training, local supply chain opportunities, tourism and managing social impacts of Sizewell C?**

We continue to have significant concerns in respect of the assumptions made in EDF's "people and economy" proposals, including the approach to education, training and the local supply chain opportunities.

Our primary concern for Saxmundham and its environs is how to accommodate additional demand for amenities and retail services within existing supply chains, what new ones will be needed, and whether there is sufficient capacity and capital (both social and economic) to provide for future needs. Significant expectations may fall on Saxmundham. The local villages close to the Sizewell C site and proposed accommodation have very little if anything by way of shops, whilst Saxmundham has two supermarkets and better shopping facilities than Leiston, so inevitably there are concerns that Saxmundham will become overcrowded with workers visiting the larger chains/supermarkets. At the very least we are talking about potentially double the numbers of people using Saxmundham's facilities than do so currently. Saxmundham's civic amenities, local services and social spaces are quite limited for its population size, for example we have no leisure centre, a very limited library service, a GP surgery that will need extra capacity (local primary care already struggles to cope with community needs and is facing a GP recruitment challenge), significantly reduced local visible police presence (the police station closed and PCSO cover was withdrawn), and pressures on available parking.

Saxmundham's population has nearly doubled since 2010 with the building of 572 additional dwellings, and the District Council's Local Plan envisages at least another 800 dwellings (most forming a new "South Saxmundham Garden Neighbourhood") to be developed in Saxmundham, but with little by way of commensurate services or infrastructure. We expect that with the additional impact from Sizewell C (when combined with the population growth from new housing development), the pressures on local amenities will be considerable, and the Town will face some critical challenges. The Town Council though believes that this could also be a great opportunity for the Town, for regeneration, the development of new skills and training hubs (Saxmundham currently has no HE or FE provision), and a potential demand booster for local business, and the Town Centre and high street economy.

Saxmundham is well placed to be an attractive and developing hub, with its easy access to the A12 and rail, its market town history and identity, and as a gateway to the heritage coast.

However, we have to view these opportunities in the context of proposals from EDF that are neither bold nor imaginative, and to look at some of the stark realities. Firstly (ref pages 16-17), the vast majority of the 5,000 plus work force during the construction phase of Sizewell C will come from elsewhere in the UK, or from abroad, and be contracted in for period of the project's life-cycle. Permanent employment opportunities for locals may only become available once the building phase is complete and may be limited. There is also a real challenge about how young people locally and the existing workforce can be equipped to take advantage of the opportunities and changes that the development will bring. The consultation document remains as vague and non-committal as its predecessor documents on aspirations to create a skills "system" or "model." There are no meaningful concrete proposals on offer for any new locally embedded institutions for structured accredited training, FE provision, apprentice learning etc.

Secondly, whilst we can see the potential for opportunities for local business, we have also learnt that increased population in and traffic through the Town alone does not necessarily assist the local business community to develop a vibrant and thriving local retail offer that includes including shops, catering, tourism, leisure or cultural outlets. Other factors have been at play such as high business rates, a declining sense of place-based community, technological and lifestyle changes, online competition, and bulk purchasing at the two large supermarkets at the expense of independent traders. These factors can erode the Town's social and cultural capital which is an essential pre-requisite for a thriving Town Centre economy.

Thirdly, when it comes to local public services (and similarly services provided through the local Voluntary and Community sector) the main challenge is that cuts from Government and principal local authorities have been relentless, impacting on library provision, NHS, social care, youth services, law, education and much else besides. Just one example recently, the County Council has decided to withdraw 50% of its funding to the local Citizens Advice service. Another example is policing, as local PCSO cover has been withdrawn. There will be significant risks from unpoliced or under-policed situations involving the local Sizewell C workforce.

The Town Council, working with our Neighbourhood Plan Steering Group have been working to address these issues. We have built our strategy around a survey of Saxmundham residents and community engagement about their needs and aspirations for their town, families and community. Key issues raised from the needs survey and engagement exercise include: -

- A need for better leisure/community centre facilities and better use of public space (e.g. recreational space, parks, gardens etc) within the confines of the town.
- A pressing need for better facilities the town's young people, including cultural facilities (cinema, arts, dance etc) and programmes for sport and leisure.
- The need for a "family friendly" pub in town following local closure(s).
- Repair and restoration of the derelict Station building for community and public use should be a priority – it is our gateway.
- The need for the Market Hall to provide a wider range of facilities for all sections of the community.
- To improve the services of the Health Centre.
- The need for improved parking provision, traffic management, and safety on the streets.
- Increasing 'footfall' in the high street to support local shops and traders.

We have been able to make some progress on these, including opening a Youth Booth and Skatepark, converting the old police station into a new office/information point/community hub, and planning a redesign of the Market Hall. However, our resources and powers are limited. We are open to working with EDF as a strategic partner for the mutual benefit of the project, the Town, and the project's legacy. Indeed, we would suggest that 'legacy' and integrating cohesively into the community and local landscape, will be important benchmarks for the project's success and reputation, including the commercial return for EDF and its investors.

#### **Questions 4 & 5 – Accommodation:**

**What are your views on our overall accommodation strategy? Please tell us your views on our temporary accommodation proposals?**

Consistent with our responses to previous consultations, Saxmundham Town Council do not support the proposed approach. The issue of how and where to site workers' accommodation was difficult and problematic when discussed at the Consultation stages 1 and 2, with all stakeholders including all the local authorities, parishes and our MP unanimously opposed to the whole idea of locating a large 'super campus' of temporary accommodation adjacent to Eastbridge in a sensitive area. Once again EDF have simply repackaged and re-presented the same model with a few modifications.

It is likely that some of the campus residents will want to use the facilities of Leiston and Saxmundham, and this will put further pressure on services and facilities which are already stretched. Of particular concern would be the issues for policing, and the strain on health services and schooling if workers bring families (see above Q3). Furthermore, while we welcome the incorporation of a dedicated caravan site to reduce the need for workers to use local tourist caravan rental provision, an additional 600 workers living close to Leiston will only compound the anticipated problems for local facilities, resources and community.

In our view there should be a new village/town with proper community facilities which can then provide quality legacy housing thereafter, and/or the accommodation strategy needs to a "dispersed" one accommodating many more workers across the whole of East Suffolk including smaller sites and in town settings from Ipswich to Lowestoft. Temporary structures add no value to the community, and are unlikely to provide satisfactory accommodation, with consequent impacts for neighbouring villages and towns. EDF has again missed the opportunity to work with the local authorities (i.e. in respect of the local plan) in identifying housing development sites which could make a contribution to solving the UK's housing shortage, including social housing provision.

If the project is to proceed, EDF Energy should therefore rethink its accommodation strategy. A more appropriate approach might be to use a much smaller accommodation campus, whilst cooperating with East Suffolk District Council, the County Council and national Government to ensure there is sufficient housing for Sizewell workers whilst creating a positive housing legacy for the region that would help reverse the historic underinvestment in local housing infrastructure and services. This legacy approach should address the lack of affordable housing in local towns and villages and complement District Council's recent decisions on development (the Local Plan) utilising the Government's £5 billion Housing Infrastructure Fund. An even distribution of workers in communities across the area would avoid the impact of the increased population being borne by one town or community and contribute to the proportionate and structured growth of East Suffolk communities.

#### **Questions 6-14 Transport: Rail, Road Strategies**

Rail v Road led strategy: Question 6 - 7

We consider it to be somewhat misleading (and confusing) to present rail and road as either/or options, and to then frame the next set of questions in that context. Given the volume of construction materials (and people), and the inadequacy of East Suffolk's existing transport infrastructure, it is clear that there needs to be a multi-modal approach to getting materials to the construction site, including by rail, road and by sea. We know for example that it is impossible, based on a road only strategy, to expect our existing already congested roads to be able to carry 900 HGVs a day plus the additional Park and Ride buses, reaching a total up to extra 1,500 vehicle movements or a 70% plus increase on current levels. The potential peak volume for heavy vehicles alone is greater than that carried by the M6 Toll, or the M20 at its junction with the M25. Yet the condition of the A12 and surrounding roads is inadequate in terms of capacity and safety even for today's traffic. For the past thirty years, no significant improvements have been made. Similarly, we know that the existing East Suffolk Line, some of it single tracked, is inadequate for carrying additional freight capacity without seriously disrupting passenger services and is scarcely capable of sustaining present traffic levels comprising an hourly stopping passenger service each way. It is also unclear why the Jetty proposals have been scaled back given that it may only be possible to bring in some of the larger deliveries by sea (whether you call the delivery point a 'Jetty' or 'Beach Landing Facility').

### *Marine Strategy*

The decision against building a jetty will involve increased use of road and rail. Sections 5.4.3 and 5.4.4 state that EDF's consideration of the marine-led strategy was reviewed in the light of experience from construction of Hinkley Point, and sensitivity of the marine environment at Sizewell. EDF have instead opted for a Beach Landing Facility (BLF) for Sizewell C construction as it is stated this would have a more limited impact on shipping and navigation activities than the jetty option and would not require decommissioning (so may remain in position for use during operational maintenance of Sizewell C).

Although the BLF would be used for large indivisible loads e.g. turbine housing, it should be noted that the quantity of materials to be transported to the site is considerable: 5.2 million tonnes including sand, aggregates, cement and steel-work. It is possible, in view of experience of on-going construction of Hinkley Point, that a further 2.9 million tonnes could be added to this quantity. This begs the question of whether either rail-led or road-led options are adequate in themselves, both require major infrastructure improvements and could lead to delays that would have an impact on delivery of the project; preferencing rail options is highly dependent on Network Rail being able to provide improvements. Although the EDF provides some environmental reasons for the change in options, it appears more likely to be mainly for economic reasons.

### *Rail Strategy and improvements*

Investment in additional rail capacity is essential. The East Suffolk Line has limited capacity for additional freight, having survived previous restructurings (i.e. Beeching era) of the rail network by drastically reducing its costs. Among the cost-cutting measures was the reduction from double track to single over most of its length between Woodbridge and Lowestoft. Until the installation of the Beccles Loop a few years ago the track was only doubled between Saxmundham and Darsham, so trains were restricted to two-hourly intervals in each direction, and even with the current loop an hourly service is the maximum frequency. Without further improvements it will not be possible to increase the number of trains between the hours of 7.00 am and 11.00 pm.

The proposals to reactivate the East Suffolk line from Saxmundham to Leiston and Sizewell are very welcome, however we would argue that this must provide a legacy of improvement

for passenger transport. We wish to argue strongly that the connection must be made permanent for passenger use after the construction and that the legacy benefits of improving the connectivity between the two towns will be both economic and social. As regards the stopping point at Leiston (Sizewell Halt or new siding), we do not have a strong view.

On the upgrades to the line itself, simply installing a passing loop – as is proposed - would be wholly inadequate to avoid the inevitable delays and hold-ups. The line should have double-track capacity to run uninterrupted carriages between Ipswich and Lowestoft at all hours (and from Ipswich to Saxmundham as priority) and be able to divert off onto the Saxmundham-Leiston branch line (or the 'Green Route' as referred to in the consultation) with ease. The logistics of this are questions for rail engineers rather than ourselves, but we would again restate our strong preference for a permanent rather than a temporary rail connection solution. The fundamental point is to ensure that an improved rail passenger transport service is able to co-exist with an effective freight transport system for Sizewell C, and only double-tracking can secure this.

Finally, on the issue of upgrading the East Suffolk line, we recognise Network Rail clearly need to be engaged, which does rather emphasise our earlier point that this consultation process is simply not 'joined-up' in any sense. The business case for this is strong, however, as Network Rail will stand to receive considerable income from the increased traffic which should justify improvements to the line, including doubling the entire line and enabling through services between London and Lowestoft.

Another major concern is the timing of freight traffic rail movements. The railway lines through the town go through residential areas which at places are very close indeed to the line. The residents will face major noise nuisance if night-time freight trains are programmed. Whilst it would be possible to allow additional trains to run during the night-time hours, with the frequent changes of speed limit required by the presence of level crossings, heavy trains will make an excessive amount of noise in otherwise quiet towns and villages. Should a train have to wait for a clear path along a single-track section, the noise level would be totally unacceptable. Priority should be given to preventing the need for freight movements in or around Saxmundham at unsocial hours. Improving the capacity of the rail-line between Woodbridge and Saxmundham would therefore appear to be the only acceptable option.

#### Rail crossings: Questions 8-10

Along with upgrading the East Suffolk line, other major upgrade works on crossings, bridges and stations will also be necessary and some of these, including Buckleswood Road, Abbey Road, and a new track crossover at Saxmundham are identified in the consultation. As regards a new crossing point at Saxmundham, we would favour a footbridge crossing to the south of the town as this would fit the proposals in the Local Plan for new housing development and access to the town for pedestrians. We also strongly make the point that the unsafe situation of Saxmundham station and its current dilapidated state should also be addressed as a matter of priority, and we are in discussions with Abellio Greater Anglia and Network Rail on this issue.

#### Road Improvements: Questions 11-14

As above, we do not think options should be presented either/or in respect of road and rail, and the proposed road improvements, whilst better than what was previously proposed, continue in our view to be inadequate. It is also essential that greater consideration be given by EDF to East Suffolk District Council's current Local Development Plan concerning the envisaged Saxmundham Garden Neighbourhood. It is proposed that 800 new dwellings will be built close to the A12 in Saxmundham/Benhall and that there will also be an employment

area to be developed on the opposite side of the A12 close to Saxmundham. It is therefore reasonable to envisage a considerable increase in traffic movements from this area onto the A12 impacting on traffic flows through Saxmundham.

It is inevitable as a result of Sizewell C construction that some vehicles will use local roads including diverting through Saxmundham. This is a major issue for Saxmundham as the narrow road through the Town Centre is already congested at peak times. There is significant potential for vehicles trying to avoid the B1122 route by leaving the A12 via the B1119 (or for that matter the B1121) and 'rat-running' through Saxmundham. With significant congestion coming into the Town, the roads will simply not be able to cope, especially with any HGVs. Also the B1119 has many meanders situated along its length making it difficult for larger vehicles to manoeuvre.

We welcome proposals to resolve the situation around Yoxford (for which a roundabout alone is inadequate), with either a new bypass at Theberton or a new link road prior to the B1119 junction: Our preference is for the latter (i.e. the link road) option. As this proposed Sizewell link road runs north of Saxmundham, we are not sure how this might impact further down the A12, and consider that there could still be a case to be made for a road option south of Saxmundham. We would not support the 'D2 route' as originally conceived (AECOM report) due to potential development impact, but we are aware that the County Council have looked at alternative options. Whilst not a perfect solution, a southern road option could allow Saxmundham and surrounding villages to avoid the intrusion of considerable commercial van movements to and from the Sizewell C site via the B1119. We welcome proposals for a two-villages bypass which could certainly help relieve the pressures on the A12 around Farnham, but it may not necessarily prevent Saxmundham roads being used as a bypass 'by default' to avoid congestion further up the A12. It has also been disappointing that EDF previously rejected the better 4 villages bypass option called for to avoid congestion building up on the A12.

We remain concerned though about the cumulative impact on the town, both from Sizewell C traffic and also from other developments (e.g. Friston Substation, new housing development in South Saxmundham etc). The Town Council regularly receives complaints about traffic speeds and volumes coming into Town from both directions and the congestion at the town centre crossroads has been a longstanding problem, only partially relieved by new traffic lights that the Town Council worked hard to secure. The source of the congestion is multiple and cumulative resulting from recent housing developments off Church Hill, the opening of a new Tesco, and the location of the bus stops, so existing traffic is hard to manage. Additional traffic involving noise, pollution, vibration, congestion and possible gridlock is of huge concern to the Town Council, given that many buildings in the High Street are listed buildings and could be damaged by this additional traffic. Further mitigation and traffic flow measure that must be considered include improving the A12/B1119, as flagged in question 14, with a roundabout for coming off at Rendham Road. We note that while the B1119 in theory winds around the town. In practice, however, traffic coming off the A12 on to the B1119 takes the shorter route via the Chantry Road/High Street crossroad junction, controlled by traffic lights. It is this junction that risks becoming saturated at peak times, with additional Sizewell-related traffic. There is a need to ensure that effective controls are in place to prevent or minimise Sizewell traffic using the B1119 as shortcut.

New access road to the A12 Saxmundham by-pass, proposed by the former Suffolk coastal District Council (SCDC), now East Suffolk District Council (ESDC)

The Consultation document contains a major flaw as regards proposals for road improvements, in that it ignores the proposals of ESDC in their final draft Local Plan (published in January 2019 just a few days before the EDF Sizewell Stage 3 Consultation) for a new access road on to the A12 to the south of the town. This is a serious failure of

what should be joined-up planning. In brief, ESDC propose a new 800 dwelling South Saxmundham Garden Neighbourhood, whose housing would lie between the railway and A12 to the south of the town. ESDC propose a single access road to the A12 to serve the whole site (though we believe that in policy terms there should be two). Moreover, ESDC propose that the employment land element of the Garden Neighbourhood proposal should be on the west side of the A12, access to which we understand would be immediately opposite the access route into the main housing site. Moreover, the Garden Neighbourhood concept requires that local people should have access to the employment opportunities, and they will need to cross the A12 on foot or by bicycle so far as practicable. ESDC have not indicated what type of access routes should be constructed, but we have as a Town Council proposed that a roundabout, with excellent pedestrian crossing, is essential.

The position is more complex as residents of the proposed Garden Neighbourhood wishing to travel by motor vehicle into Saxmundham, e.g. for the supermarkets or public services, will almost certainly turn right on to (and across) the A12 as far as the B1119/A12 junction, and then turn right again, also across the southbound traffic. This means, in our view, that the plans for both junctions, including the extent of the minor upgrade currently proposed to the existing B1119 junction, must be considered closely and together, to provide a safe and effective solution.

#### Park and Ride

On questions 13 and 14 whilst not directly impacting on Saxmundham, we are supportive of the proposed Darsham and Wickham Market Park and Ride facilities to reduce traffic on the A12. However, we are aware that Wickham Market has similar challenges to Saxmundham in managing through traffic, and the proposals are likely to impact on this. Wickham Market can be a difficult route for traffic at all times, with significant pinch-points and on-street parking almost throughout the High Street. EDF should be working with Wickham Parish Council, looking at appropriate mitigation measures to avoid a negative impact. In respect of the Darsham Park and Ride, we note that the potential for a legacy benefit to the rail station in the form of additional parking has been removed; this legacy should be reinstated.

#### Engagement: Question 15

Whilst it is welcome that EDF have been running so many roadshows and consultation events at all three consultation stages, as observed above, there are still important pieces of information that are missing, such as a comprehensive IEA. As we have also observed, this consultation is taking place in silo (informed only by EDF's corporate priorities) and does not address the needs and input of other key partners and stakeholders, local and national, that play a role in such a significant national infrastructure project, from transport to housing and environmental safety. We would suggest that all these parties, including BEIS (Dept for Business, Energy and Industrial Strategy), should come to the table and be directly involved in the engagement work. To make the vision for the "Energy Coast" a success in terms of greener fuel and environmentally sensitive infrastructure, a "Joint Infrastructure Taskforce" involving principal local authorities, EDF and other key energy players, transport operators, local authorities and key national government agencies should be formed to manage the project going forwards.

## SAXMUNDHAM TOWN COUNCIL: RESPONSE TO SIZEWELL C STAGE 2 CONSULTATION



Saxmundham is a small market town with a population of approximately 4,000. It is located on the A12 mid-way between Ipswich and Lowestoft and about seven miles west of Sizewell.





## **Saxmundham Town Council – Draft response on Sizewell C, consultation response**

### **Introduction – Saxmundham**

This second consultation is, in practice, the final opportunity for public consultation on EDF's proposals, as the third consultation will effectively form the application to the Planning Inspectorate for planning consent. Following the first consultation, Saxmundham Town Council made various comments individually and collectively; our neighbouring towns also expressed serious concern about the impacts of EDF's proposals on local communities. These comments appear to have been largely ignored. In addition there is still a distressing lack of detail and clarity, particularly on the environmental and infrastructure aspects of the proposal to enable a considered response.

Whilst this remains a cause for real public concern, we have answered the questions that impact Saxmundham as specifically and positively as possible. In doing so we find there is barely a negative issue that is not mirrored in other parishes in the immediate community. Very few tried and tested positives specifically enrich the overall Suffolk Coastal Area and leave a long-term local benefit, even though the project is to the advantage of the nation as a whole. There must be some beneficial material and community legacy offered to address these issues including the provision of adequate infrastructure to meet the continuing requirements of the project and to enhance the local area's economy and prosperity. For a detailed response, refer to our replies to Questions 7, 8 and 9.

**Although detailed in the specific response questions, outlined here are a few key points.**

#### **Rat- running down local roads.**

It is inevitable that some vehicles will use local roads, and we have particular concerns about the narrow Saxmundham Town centre that is already congested at peak times. Adequate preventative measures to address rat-running are not detailed in the document, though the use of automatic number plate recognition (ANPR) was suggested in the Consultation. The main problem with ANPR is that it is retrospective and will apply only to HGVs; besides, the Consultation does not indicate who will monitor the ANPR data.

Since the advent of 'Satnavs', the designated route will be ignored as most devices are programmed to choose either the shortest or quickest route. For traffic coming from the south or west, the designated route is neither.

#### **Related traffic issues**

The consultation document persists in restricting the options for A12 improvements. We urge EDF, together with Suffolk County Council, Suffolk Coastal District Council and the Department of Transport to co-operate to make the most of this opportunity for major long-term and long overdue improvements to the A12. Refer to our response to Questions 3, 11 and 12.

#### **Temporary accommodation proposals for workforce**

Current EDF proposals are for a temporary campus for 2400 workers near Eastbridge. The impact on Saxmundham is not difficult to predict. This small market town already has severe infrastructure problems that are on the 'cusp' of unacceptability. To add this large influx of labour to an already over-stretched Health facility and other public services is untenable. See response to Questions 5 and 6.

While accepting that some temporary accommodation will be required, it would seem much

more sensible, and cost-effective, to build **some** permanent accommodation on the outskirts of Leiston and closer to Sizewell itself. Consideration should also be given to dispersing accommodation over an area within one hour's travelling time.

The accommodation need not be solely temporary. For example, in the Olympic Park at Stratford, athletes' accommodation has been transformed into both open market and affordable housing. This option would fulfil the need for more homes in the next decade and provide a long term housing legacy for the Suffolk Coastal area. Refer to our answers to Questions 5 and 6.

### **Community issues**

The impact on local services, schools and medical facilities does not appear to have been addressed in the consultation. These facilities are already under significant pressure from existing housing developments in Saxmundham and surrounding villages. This aspect requires detailed proposals from EDF in conjunction with the appropriate councils and authorities. A need had already been recognised in Saxmundham for an expanded 'one stop shop' medical facility, but this was deemed unaffordable by earlier NHS administrations. Refer to our answers to Questions 5 and 6.

The likely impact on the daily life of the community in the wider sense, in particular addressing workforce behaviour, has not been fully addressed. This omission needs to be rectified. Assurances on this occasion that there are more controls, checks and sanctions on contractors does not accord with previous experiences. We already have a severe deficiency in local policing. As Saxmundham is the main town in the area, we would expect sufficient access to a police service. Refer to our response to Questions 5 and 6.

### **Construction issues and impact on tourism**

EDF estimate that spoil heaps up to 35m in height (height of the Orwell Bridge) will be created over the first two years of the construction phase. Their visual impact is likely to deter visitors to RSPB Minster, Dunwich Heath (NT) and the surrounding parts of the AONB. These attractions now bring thousands of visitors to the area and support much of our local economy. While any economic disadvantages may be partially offset by business created by Sizewell C, they will impact Saxmundham's local holiday-let, service and supply industries in the longer term. Further studies are required, together with proposals for compensating businesses adversely affected by the development. Refer to Question 2.

### **Environmental issues**

The Sizewell construction site sits in the middle of an AONB and is surrounded by areas of the highest conservation designation. It is therefore absolutely vital that the likely environmental impacts are thoroughly and vigorously investigated. To quote the National Trust: "Proposals for Sizewell C need to be an 'environmental exemplar' supported by a robust Environmental Impact Assessment"

Although EDF say that studies with appropriate agencies are "ongoing" there are no details in the consultation document. It is absolutely essential that these are completed and independently assessed for their adequacy before final consent for the development is given. Refer to our response to Question 2.

There are hypothetical positives for education and employment. However there is no certainty that local people will be encouraged to take advantage of opportunities in the resulting Construction and Nuclear Industries.

Saxmundham Town Council believes there must be some other built-in incentive/advantage to living in Suffolk Coastal in the shadow of Sizewell Nuclear Power Station. There must be some compensation for the disadvantages imposed by the long project construction and

production cycle.

**Question 1: What are your overall views on EDF Energy's proposals to build a new nuclear power station, Sizewell C, and associated development**

1. As a Town Council we feel it would be inappropriate, or rather beyond our immediate remit, to take a clear single position on the overall desirability EDF Energy's proposals for Sizewell C as a National Strategic Infrastructure Project. Our Councillors and residents will have differing views on the broader core policy, energy and environmental issues and questions related to new nuclear power generation capacity and facilities. However, overall we believe that it is fair to say that there are significant concerns as well as frustrations about the quality of public information and engagement from EDF, Government and public authorities responsible for infrastructure, concerns about the transparency and accessibility of decision-making processes, concerns about the overall burden placed on the amenities of small rural parishes, and above all concerns about the lasting impacts for the local area, both environmental and economic.
2. Sizewell C is a massive £14 billion project with ambitions to eventually generate electrical capacity of approximately 3,260 megawatts (MW) to meet up to 7% of the UK's electricity needs (or the equivalent of supplying approximately 5 million homes). The project to date as led by EDF even at this early planning stage appears to have been characterised by concerns of financial instability and its commercial viability, delays, over-runs, safety concerns in the light of regulators decisions about 12 of EDF's existing reactors, alongside internal problems within EDF including allegations of false accounting, anti-competitive practice as well as legal disputes which may all be pre-cursors to further major operational problems and questions of integrity about the nuclear industry. The question overhanging the proposals is whether this project is still appropriate given that it will not generate any new electricity until around the end of the next decade (long after the predicted shortfall in electricity supply), the high guaranteed "strike price" of its proposed output (roughly double the current wholesale price of power) – effectively subsidised by UK bill payers and taxpayers, more accumulation of high levels of dangerous waste with no permanent disposal method yet discovered, and potential security risks given the geo-political context of investment partners.
3. Nevertheless Parliament and Government have been supporting the project as a key alternative to high-carbon fossil fuel reliance, so as we have said above we do not adopt a fixed for or against position on the case behind Sizewell C for new nuclear power generation capacity – an issue over which there is much scepticism both locally and nationally and doubts and concerns that many in our community share and also by many respected energy analysts as well as environmental and climate change specialists. We do however accept in principle that if national decision-makers are wedded to the delivery of new nuclear capacity as part of the UK's future energy strategy, then it is better that new nuclear power stations are constructed at sites already used for this purpose as this approach is more compatible with principles of sustainable development, but only provided that appropriate measures are taken to mitigate any adverse impacts on the local environment, ecology and communities.

4. Whatever the eventual form proposals the proposals for Sizewell C may take they will have massive implications for our community, for the local economy, for local services, and will have long term impacts for the ecology, demography and economic geography of the whole area. Construction which would take place up to 10 year period will be hugely disruptive to community life and have adverse environmental, amenity and traffic impacts; it will impact on coastal processes and groundwater, local agriculture as well as a wide range of birds, animals and plants, threatening at least two Sites of Special Scientific Interest including the nationally treasured Minsmere Reserve and several aspects of local heritage. Tourism and hospitality which are key industries for Suffolk Coastal will be especially impacted, along with the areas perceived attributes and assets of tranquillity, unspoilt coast and beaches, marsh landscapes, heritage sites, which give a distinct identity and attractiveness of the area for both for visitors and newcomers. Saxmundham itself is a “gateway” to the Suffolk heritage coast, it is also a growing Town with inevitable pressures and strains on infrastructure and services which will accelerate massively should Sizewell C move into construction stage.
5. That is not to say that we are unaware of the benefits and opportunities that EDF’s proposals for Sizewell C could bring to our area and communities, including opportunities for local jobs and for local businesses engaging with the supply chain and attracting new skills. But with awareness of these opportunities there needs to be awareness of risks, and the risks associated with nuclear energy projects are very considerable - there have been 23 accidents involving reactor core meltdowns among the world’s 443 nuclear power plants and serious incidents like Chernobyl or Fukushima are always possible. It is our duty to ensure that the range of risk-related concerns within the community are expressed robustly, but also to argue the case for an appropriate package of mitigation measures for the many challenges that this community faces as a consequence of these proposals. Given the economic value, risks and scale of this project the package of mitigation measures offered are somewhat derisory.

<p><b>Question 2: What are your views on the potential environmental impacts and proposed mitigation at the main development site?</b></p>
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6. Saxmundham Town Council accepts that a construction project of this magnitude and duration will in itself require significant development; however this should be as compliant as possible with the overarching principles of sustainable development i.e. meeting the needs of the present without compromising the ability of future generations to meet their own needs. So where the development is temporary (construction site facilities) every effort should be made for the land to be restored to its previous use at the end of the construction phase of the project. This project is also notable for the sheer size of the scheme within an ecologically important landscape; the main development site will occupy 305 hectares - development of this scale in such a sensitive location will have major impacts upon biodiversity
7. The serious threat to our precious wildlife sites is of deep concern to the whole community, both for people in Saxmundham and in all our neighbouring parishes. On the Sizewell estate there are no less than 28 Biodiversity Action Plan species, all dependent on the mosaic of very special habitats, most with European regulated designations. The plans include building directly on the north-east triangle of the Sizewell Marshes Site of Special Scientific Interest (SSSI) with a complex water management system, as well as impacting on surrounding wildlife and heritage assets. There are also potentially wider environmental impacts which are difficult for us to make a determination on as EDF have not prepared or published an

environmental impact assessment (IEA), however potential impacts that have been identified by independent experts include greater potential exposure to coastal erosion, inland flooding, Coastal integrity (including Long-shore drift and coastal surges) is an issue of ongoing concern to local residents, just within the last few weeks a local person lost their life in a cliff collapse at Thorpeness. The Suffolk coast has always been exposed to considerable erosion by the North Sea, as evidenced by the destruction of Dunwich and major floods more recently including 1938, 1953, 2006, 2007 and 2013, when storm surges flooded Dingle marshes – and Minsmere. In the longer term, if sea levels continue to rise, the power station site could become an island. In this case, north-east winds will blow the sea directly onto the site, unprotected by any beach shingle. This consultation claims that there will be minimal to no impact on the Minsmere coastal frontage and maintains that changes in this very dynamic coastline will be down to natural processes rather than the proposed development, but provides no evidence to back this up.

8. Finally the environmental impacts also need to be looked within the context of the wider economic impacts which we will explore further in our answer to question 13. Although not a recognised seaside town Saxmundham is the "gateway" town for Suffolk's heritage coast and the proximity to the coast means that residents and visitors enjoy excellent access to the amenities offered by having the coastline so close; this includes access to the beach for recreation including walking, dog walking, and swimming. So the impacts on their current amenities, combined with the impacts from the additional traffic, that are associated with the proposed development of Sizewell C, are the major concerns for the residents
9. In light of this it would be preferable if EDF looked at options for scaling back the size and scale of the development area such as a structure that might be designed to accommodate one rather than two new reactors. We are also struck that Sizewell A which is being decommissioned is not included in these plans – one solution to reducing the land take could be to use some of Sizewell A's land and facilities (including potentially for worker accommodation).
10. The proposed mitigation measures in respect of the environmental concerns raised at stage 1 are either unspecific, or the consultation document suggests that they are still being worked with details of the information and assessments "to be given at a later stage", so it is difficult for us to "give our views" on the proposed mitigation when so little is proposed.

### **Question 3: Main Development Site: New Access Road**

11. Our response to this question on an access road from the B1122 is contingent on our responses to questions 11 and 12. There is of course a need for a site access road, but in our response to questions 11 and 12 we also question whether the B1122 should be the main route to the site at all especially for HGVs and we strongly argue to an alternative relief road, which would of course affect how an access road is sited. The current proposals effectively involve running over the Sizewell marshes through a bridge or causeway option; whilst we would suggest that the single bridge option would least have adverse environmental impact we would need to see the IEA to assess this.

### **Question 4: Main Development Site: Managing Construction Materials**

12. These proposals involve a further significant 'land take' to create borrow pits of excavated peat and clay to store a high volume construction materials off the immediate site, and thereby reduce the need to transport large quantities of materials in and out of the site during construction. We would be interested to know if there are any alternative approaches to managing construction materials, as all the options for borrow pits might involve difficulties for the land to be restored to its previous use at the end of the construction phase and it is not clear how local farmers might be compensated for the additional loss of land.
13. Of the options offered we do not have a view as to which of the fields around Ash Wood should be used for borrow pits provided the Environmental Impact Assessment is satisfied.

<b>Questions 5 and 6: Accommodation - Overall strategy and campus layout</b>
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14. Saxmundham Town Council **do not agree with or support the proposed option(s)**. The issue of how and where to site workers accommodation was one of the most difficult and problematic issues discussed at the stage 1 Consultation stage, with all stakeholders including all the local authorities, parishes and our MP opposed to the whole idea of a single large 'super campus' of temporary accommodation adjacent to Eastbridge; whilst there have been some modifications of the original proposals such a slight repositioning nearer the main site and a small downward adjustment in the number of temporary units envisaged, it appears to us that EDF have simply re-presented and repackaged the same model.
15. It is difficult to comprehend why EDF have shown so little consideration or sensitivity to the negative impact of housing up to around 2,400 workers in a single "temporary town" site; in our view there either needs to be a new village with proper community facilities which can then provide quality legacy housing thereafter, and/or the accommodation strategy needs to a "dispersed" one accommodating many more workers across the whole of Suffolk Coastal including smaller sites and urban settings from Ipswich to Lowestoft. Furthermore at a time when our local authorities are being required to identify new land for housing development to make our contribution to solving the UK's housing shortages, temporary structures will add no value or planning gain in this respect.
16. Above all the proposals as they stand for a soulless campus with minimal amenities fails to take into account the significant impact on the services and amenities of nearest towns and will place a disproportionate burden not only on Saxmundham but also on neighbouring or Towns and villages especially Leiston, as well as Eastbridge and Theberton. The following issues need to be addressed:
  - With such a large itinerant workforce bound by their own a code of conduct it would be impossible for the local constabulary to control, especially in an area where police cuts have been so severe that there is scarcely even any PCSO cover, left let alone any meaningful policing - this has been a particular problem in Saxmundham. The local crime rate in Leiston went up significantly during the construction stage of Sizewell B, and lessons need to be learnt from this.

Health Services:

- There will, of course, be an impact on health services, particularly in Saxmundham. The health care facility is already at full capacity and is continually trying to recruit doctors and health care professionals.

- Saxmundham Health Centre, with the continuing programme of domestic house building, is barely able to meet targets, particularly with preventative routine medicine, such as blood tests, asthma treatments etc. A large, sudden influx of labour will only exacerbate an already difficult situation.
- Access to leisure services: Leisure facilities are already limited in Saxmundham. We would appreciate the provision of sports and leisure facilities remote from the temporary accommodation and within easy reach of Saxmundham and Leiston.
- Education requirements:
  - Saxmundham is the chief town in the area and contains services not available in the surrounding towns and villages such as the railway station and proximity to the A12. The impact of the construction and the completed project is likely to be higher than implied in the Consultation.
  - Saxmundham has a primary school for ages reception to eleven years and a Free school 11 to 16. The primary school is already experiencing difficulty meeting the demand created by recent housing developments in the town and would have difficulty expanding to accommodate the children of Sizewell C permanent employees.
  - It is a positive development that EDF are already liaising with secondary educational facilities and supporting SCC's Raising the Bar Initiative.

#### **Question 7: Transport: Overall Strategy**

17. Saxmundham Town Council believes that there is an over reliance on the use of the B1122 for both freight and the Park and Ride bus facilities during the Sizewell C construction phase. In the following sections of this question we enlarge on where better use of rail and sea transport would help to mitigate the impact on the local environment.

We do not think that the Park and Ride facility will prevent traffic volumes increasing through Saxmundham onto the B1119. Many local contractors will have vans which they will need to bring to site. Suggesting they use the official route is laudable but they are more likely to take the shortest route from the A12 through Saxmundham and along the B1119.

We support the postal consolidation facility given that any residential workers will receive post and also order products on-line for delivery. This will minimise additional freight traffic to the site.

The Accommodation Campus in its recommended position does provide concerns as it is not explained whether all will be expected to arrive/leave by use of the public transport or park and ride facility. It is noted that space for car parking is provided at the site.

#### **Question 8: Transport: Rail**

18. The Sizewell C Stage 2 Pre-Application Consultation document states that there would be five freight trains per day: ten train movements. This represents twelve million tonnes of bulk material for the project.

Two areas of rail operation need to be considered:

- The existing capacity of the East Suffolk Line between Saxmundham and Westerfield Junction some of which is single track;
- The operation of the branch between Saxmundham and Sizewell.

The existing East Suffolk Line (ESL) is only capable of sustaining its present level of traffic comprising an hourly stopping passenger service each way, almost entirely lightweight diesel multiple units. The additional heavy traffic would have to be inserted between these trains unless the freight traffic moved exclusively at night. This would be unacceptable to those living adjacent the line as well as for operational reasons.

Some of the ESL is single line of which sections are jointed track and appear to be in poor condition (as indicated by the low speed limits). The ability of this track to withstand heavy freight trains is questioned, not to mention the noise to adjacent settlements.

Network Rail will receive considerable income from the increased traffic which should justify improvements to the line, even to the extent of doubling the entire line between Saxmundham and Westerfield.

Saxmundham Town Council fully supports the extension of the branch line to the Sizewell site. This will avoid the off-site trans-shipment of materials from rail to road and the consequent increase in road traffic.

Should these improvements be made, it would then be possible to introduce a passenger service from Saxmundham to Leiston and the Sizewell site, either as a 'shuttle service' between the two points or as a diversion of some of the northbound trains from Ipswich. Furthermore, were a chord to be constructed for southbound (up) trains to access the Leiston branch, contractors parking at the proposed Darsham P&R facility and contractors travelling from Lowestoft could also travel to site by train.

Saxmundham Town Council believes these improvements would reduce the traffic on the local roads which, in any case, are not fit for present traffic levels, let alone for the construction of a £14b power station.

#### **Question 9: Transport: Sea**

19. In order to facilitate shipment of large or very large loads, Saxmundham Town Council would support the construction of a wide jetty at the shoreline near the construction site. We recognise that there will be indivisible loads too large to be transported by road or rail. The draft of vessels berthing at the jetty should be kept to a minimum to reduce the need for dredging as the Suffolk Coast suffers from erosion and instability.

It is appreciated that the Suffolk Coastal path will be kept open for the majority of the construction phase and, in the event of closure, an alternative route further inland will be made available. This will be important for both local and tourist populations.

#### **Question 10: Transport: Park and Ride**

The suggested locations for the Park & Ride facilities both impose traffic on the A12 and B1122 (see answer to questions 11 and 12). We hope that consideration will be given to constructing the D2 route.



If the Wickham Market P&R facility were to be re-located closer to Campsea Ashe railway station, contractors could use the train direct to site using the Leiston branch. See response to question 8.

<b>Questions 11 and 12: Roads improvements - A12 and B1122</b>
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20. We have major concerns in respect of traffic volumes both on the A12 and B1122. EDF is relying on the B1122 as the main access route to the site, expecting a narrow, winding, country road to be able to carry 900 HGVs a day, and simultaneously act as the emergency and evacuation route. When traffic volumes from the P&R buses are added you reach a total of 1,090 to 1,540 vehicle movements – it would be over a 70% increase on current levels. Putting this into perspective, this potential peak volume for heavy vehicles is greater than that carried by the M6 Toll, or the M20 at its junction with the M25.
21. A Suffolk County Council survey in July 2016, revealed that traffic on the B1122 was 'the number one' concern for the community, with residents feeling that EDF has not yet provided any satisfactory solutions. There is significant potential for vehicles trying to divert or avoid this route by leaving the A12 via the B1119 (or for that matter the B1121) and 'rat-running' through Saxmundham. There is already significant congestion coming into the Town and the roads will simply not be able to cope with this, especially any HGVs, as the B1119 has many meanders situated along its length making it difficult for larger vehicles to manoeuvre.
22. The proposed mitigating measures developed out of the stage 1 consultation process to alleviate pressures on the A12 and B1122 include a possible bypass at Farnham and roundabout or new traffic lights at the A12- B1122 junction at Yoxford. These do not deal with the Saxmundham traffic problem. Therefore, we consider the options presented to be simply inadequate. A new two-villages bypass would certainly help relieve the pressures on the A12 around Farnham, but would not prevent Saxmundham roads being used as a bypass 'by default' to avoid congestion further up the A12. The Town Council regularly receives complaints about traffic speeds and volumes coming into Town from both directions and the congestion at the town centre crossroads has been a longstanding problem only partially relieved by new traffic lights that the Town Council worked hard to secure. The source of the congestion is multiple and cumulative resulting from recent housing developments off Church Hill, the opening of a new Tesco, and the location of the bus stops. So existing traffic is hard to manage, but the additional traffic involving noise, pollution, vibration, congestion and possible gridlock is of huge concern to the Town Council given that many buildings in the high street are listed buildings and could be damaged by this additional traffic.
23. For the above reasons we consider that **none of the above options are acceptable**. A two villages bypass (EDF having already rejected the better 4 villages by pass called for) combined with a Yoxford roundabout plus implementation of all of the minor suggested improvements offer the least worst of the options proposed in this consultation.

From experience of driving along the A12 through Yoxford at peak periods, we believe that a roundabout will not work. A12 traffic both northbound and southbound

is virtually continuous having 'bunched' to comply with the rigidly enforced 30mph speed limit. Thus each main road traffic stream will dominate flow through the roundabout so that joining traffic will be held up.

Even though we do not support this option, traffic lights would be a preferable solution.

24. However we urge EDF and partner authorities to reconsider the road transport issues from scratch and to accept the strong case for a) reinstating the four villages by-pass project and b) a separate relief road linking the A12 from a more southerly point directly with the Sizewell Site (for example the so called "D2 option"), with additional measures for coping traffic coming from the north such as short bypasses around the villages of Middleton and Theberton.

<b>Question 13: People and Economy</b>
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25. We have significant concerns in respect of the assumptions made in EDF's "people and economy" proposals, including the approach to education, training and the local supply chain opportunities.
26. Our primary concern is about how to accommodate additional demand for amenities and retail services within existing supply chains, or what new ones will be needed. The local villages close to the site and accommodation have very little if anything by way shops, whilst Saxmundham has two supermarkets and better shopping facilities than Leiston so there are fears that Saxmundham will become over crowded with workers visiting the larger chains/supermarkets. We are talking at the very least about potentially double the number or more of people using Saxmundham's facilities than do so at the moment. Three years ago working with a civic group a survey was undertaken of Saxmundham residents about their needs in the Town and since then the Town Council has been working hard to address these; concerns and needs raised from the survey exercise include that:-
- Saxmundham needs provide a better leisure/community centre offering flexible facilities for indoor and outdoor leisure pursuits, and increase the amount of space available for families to sit out in parks or gardens within the confines of the town.
  - There needs to be a more effective overarching services to ensure that the town's young people and visiting friends are provided with their own properly funded and managed facilities to include space for sports, recreation and the arts - the report based on the survey responses concluded that there was lack of facilities for young people. Youth provision is vital. Open air recreational space and things to do are also essential to grow the next generation of responsible residents with Saxmundham lacking dance, theatre, art and consistent structured sports programmes.
  - The need for a "family friendly" pub in town following the closure of the White Hart.
  - The need to address the problems of Station building which is closed and derelict, providing neither services to rail travellers nor amenities for non-travellers
  - The need for the Market Hall to provide a wider range of facilities for all sections of the community.
  - Many residents felt disappointed by the services of the Health Centre, and feel that it cannot cope with community needs.

- A need for improved parking provision, traffic management, and safety on the streets
27. Saxmundham Town Council has been working hard in partnership with local businesses, the voluntary sector and principal local authorities to address these issues, including funding and opening a Youth Booth and commissioning a Skatepark, securing a new community hub, planning a redesign of the Market Hall to include co-location of the library, starting to address the railway station's dereliction, and also commencing a Neighbourhood Plan process and a new local Partnership. However with our limited resources and powers we are still only able to scratch the surface in terms of providing for or securing long term sustainable solutions to the challenges that Saxmundham faces. Our population has nearly doubled since 2010 with the building of 572 additional dwellings. The additional impact from Sizewell C on local amenities will be considerable.
28. The vast majority of the 5,000+ work force during the construction phase will come from elsewhere in the UK and from abroad. Permanent employment opportunities for locals will only become available once the building phase is complete, and will be limited. There is also a real challenge about how young people locally and the existing workforce can be equipped to take advantage of the opportunities and changes that the development will bring.
29. Finally we have previously mentioned impact on tourism. The tourism industry along Suffolk Heritage Coast alone is worth more than £200 million a year. There could be an impact on high-end catering and accommodation, where income will be lost. An impartial survey of individual visitors is needed. We believe this would highlight the need to protect the particular qualities of peace and quiet, absence of light pollution, absence of heavy traffic, abundance of wildlife and wild open spaces that draw people here.

<b>Question 14: Consultation process</b>
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30. This consultation exercise is quite technical and unwieldy one involving closed questions and options which not offer the chance for respondents to express view or develop arguments which might provide alternative options, or indeed to reject the existing package options. The consultation only does the bare minimum to enable EDF to fulfil its statutory requirement to demonstrate consultation with local communities. To a large extent it presents a "box-ticking exercise" ignoring many of the key issues objections raised four years ago, and EDF could have used this time to engage in a more meaningful public consultation and outreach exercise.
31. Once again we are presented with a short consultation period spanning the Christmas holiday period when Town Councillors and staff are inevitably absent over the holiday period. There is little by way of greater detail and evidence for the proposals than that given at Stage 1. It is easy to become disheartened when ploughing through the 321 pages of the 2nd consultation document that lessons from the first consultation have not been learnt and there is insufficient information provided to be able to give a truly informed response to the consultation questionnaire. EDF **must** at the very least publish its full Environmental Impact Assessment before these consultations go any further.

<b>15: Mitigation/Community Benefit</b>
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Requested Mitigation Measure /Community Measure	Necessary/Desirable or Level of Priority	Negative impact this will reduce or positive impact this will secure
'Four Villages' by-pass plus "D2" route	Priority 1; Essential.	Reduce congestion on A12, B1119, B1122 and other minor roads.
Dispersal of temporary accommodation.	Priority 2; Necessary.	Reduce the concentration of impact on local communities and infrastructure.
Extend and improve rail link from Saxmundham to Sizewell site.	Priority 3; Necessary	Reduce impact on environment and road infrastructure by reducing heavy goods traffic.
Improve rail link between Saxmundham and Westerfield Junction.	Desirable.	Enable higher frequency of trains and prevent disruption of local passenger traffic.
Proposed temporary accommodation to be planned and re-designed as permanent in accordance with local plan.	Desirable	Prevent duplication of effort in demolishing and re-building. Provide much needed housing for local people.
Provide funding to augment local policing.	Priority 3; Essential	To control the large influx of contractors and their vehicles.
Provide full environmental impact assessment	Priority 4; Essential.	Reduce impact on fragile environment.

## **SIZEWELL C**

### **STAGE 1 CONSULTATION**

#### **Representations from Saxmundham Town Council**

##### **SUMMARY**

Saxmundham Town Council is particularly concerned with traffic impacts, and the impacts on the local residents of Saxmundham, that will result from Sizewell C.

It is considered that there is insufficient evidence and information presented at this Stage 1 consultation. Alternative options must also be included by EDF Energy in order to make informed choices on all possible options available.

EDF Energy is imposing a limited consultation period for such an important development.

Further time and information is therefore requested in order to allow fair assessment and decisions to be made.

These duly made representations will therefore be put forward as a matter of public record for a future independent Planning Inspector to determine whether EDF Energy has undertaken the correct process and procedure.

##### **1.0 INTRODUCTION**

- 1.1 These representations are made by Saxmundham Town Council.
- 1.2 This response was agreed by majority decision of the Council at its meeting on 4<sup>th</sup> February 2013.

##### **2.0 NATIONAL ENERGY STATEMENT**

- 2.1 It is the understanding of Saxmundham Town Council that under the Government's National Policy Statement for Nuclear Power Generation (EN-6) 8 sites have been identified that are considered potentially suitable for development as a nuclear power station.
- 2.2 It is accepted that Sizewell C is one of these 8 sites that they think is potentially suitable for a nuclear power station.
- 2.3 What remains unclear from National Policy Statement (EN-6) is how many of these sites are actually needed, the timescales for delivery, and the selection process that will be involved. It is not apparent that all 8 sites are needed, and it is not clear if or how the sites will be assessed against one another, or if they will only be considered as stand-alone applications.

- 2.4 It is therefore understood that Sizewell C must be considered on its own merits by an independent Planning Inspector and then the Secretary of State in due course.
- 2.5 Thus it should not be assumed that Sizewell C will automatically be granted planning permission.

### **3.0 LOCATION OF SAXMUNDHAM**

- 3.1 Saxmundham is an historic market town at the centre of the Heritage Coastal region in Suffolk, England. As such we would not want to see any development which might spoil the surrounding landscape even if it isn't visible from Saxmundham. It has a population of approximately 4,000. It is well served by a range of health, education, and community services. It has a weekly market, two supermarkets, plus a good selection other retails shops.
- 3.2 The town has good transport links. It is located just off the A12 which provides easy access to Lowestoft, Felixstowe, Norwich and Ipswich. It also has good public transport links with a regular bus service and rail links to Lowestoft, Norwich, Ipswich, and London.
- 3.3 Saxmundham Town Council are primarily concerned with the traffic and socio-economic impacts that are associated with the proposed development of Sizewell C.

### **4.0 TRANSPORT**

- 4.1 Saxmundham Town Council feel there is a distinct lack of detail provided by EDF Energy with this Stage 1 consultation regarding transport information.

#### *Transport Management Strategy*

- 4.2 Saxmundham Town Council are keen to see that EDF adopt a suitable approach to traffic management with the proposed development of Sizewell C. So far EDF Energy has produced limited transport information.
- 4.3 Saxmundham Town Council therefore request that EDF Energy must produce a traffic management strategy to accompany such a large scale proposal, in order to fully assess the various options being proposed.
- 4.4 Wherever possible, any Sizewell related traffic must be kept to the main roads, most especially the A12, where the most suitable routes are properly and carefully signposted. Signage must therefore feature within EDF Energy's traffic management strategy.

#### *Rail*

- 4.5 EDF Energy has currently provided very little information on how the railway will be fully utilised during the construction phases and beyond.

- 4.6 Although Saxmundham Town Council acknowledge and agree with making the most efficient use of the existing railway, more information is still required before any assessments can be completed and any options can be taken forward.
- 4.7 Saxmundham Town Council remain particularly concerned regarding EDF's reference to "*some freight train movements may need to occur at night*". The amount and frequency of 'night movements' do not appear to be documented within EDF Energy's consultation material, and it is felt this should be provided for a complete understanding of all possible options.

## **5.0 SOCIO-ECONOMIC FACTORS**

- 5.1 Further development of Sizewell may have an impact on the town of Saxmundham. There may be some potential benefits, through employment and trade. However, there may be some detrimental effects to town, notably impacts on residents, public amenities, local amenities and some local employers.
- 5.2 Due to its location and facilities, it is anticipated that Sizewell C's temporary and permanent workforce will have some impact on Saxmundham. This will have a knock-on-effect on the town's current housing and employment balance.
- 5.3 Additional people, either permanent or temporary, will also have an impact on the town's amenities, including its leisure and recreational facilities. Impacts on policing and the other emergency services must therefore be properly and fully considered along with the other aspects associated with the Sizewell project.
- 5.4 So far, it does not appear that EDF Energy have fully considered the socio-economic effects associated with the proposed Sizewell C development.

## **6.0 EDF ENERGY PROPOSED OPTIONS**

- 6.1 Saxmundham Town Council has the following comments to make on the different options presented in the Stage 1 consultation material.

### *Park and Ride*

- 6.2 A 'park and ride' site at Darsham Station could, if some facilities are provided for rail commuters, relieve some of the pressure on parking in Saxmundham. However, we would want to see such space made available immediately, without their having to wait until the end of the ten-year construction period. Saxmundham Town Council consider that none of the other 'park and ride' options currently presented are suitable as they are all being proposed on greenfield sites with no local benefit.
- 6.3 More suitable brownfield sites should be considered first.

- 6.4 The southern 'park and ride' options are considered to be very poorly related to the local road networks.
- 6.5 Saxmundham Town Council suggest that there could be a single 'park and ride' site on the A12 associated with a link road from the A12 to the Sizewell site, perhaps using the route that was formerly known as route "D2", if such a road were to be built.

#### *Accommodation*

- 6.6 In relation to the accommodation proposals, Saxmundham Town Council are concerned that EDF Energy are suggesting having all 3,000 workers on one site.
- 6.7 This will result in direct impacts on nearby towns, such as Saxmundham. The impacts of Sizewell's off-duty workforce must be fully assessed by EDF Energy before any options can be considered further.
- 6.8 None of the proposed campus accommodation sites are considered to be suitable as they are all greenfield sites.
- 6.9 Saxmundham Town Council would prefer to see several smaller campus sites, on brownfield sites if possible. This could provide a better living environment for EDF Energy's workforce, as well as reducing the impact on smaller towns or villages. This would work even better if a 'park and ride' facility was located in close proximity to these campuses.

#### *Visitor Centre*

- 6.10 Saxmundham Town Council does not support any of the currently proposed sites for a visitor centre.
- 6.11 The current visitor centre sites are all proposed on greenfield sites, and brownfield sites should be considered first.
- 6.12 Saxmundham Town Council's preference is that any visitor centre would be best located within the power station site or in the town of Leiston, perhaps on the Sizewell Sports & Social Club site.

#### *Transport 'Improvements'*

- 6.13 Saxmundham Town Council has been considering the transport 'improvements' being currently proposed by EDF Energy.
- 6.14 It is felt that the current proposals do not accurately reflect all of the possible options that should be considered at this initial stage of the consultation. All options, including earlier options, must be fully explored before EDF Energy is allowed to move forward to their preferred options.
- 6.15 Saxmundham Town Council would therefore request that EDF Energy further explore and assess the option previously referred to as "Route D2". This option links Sizewell to the A12, and may be Saxmundham Town Council's preferred option. The Town Council would therefore like this to be considered as part of their transport proposals.
- 6.16 Improved road signage must be included as part of any transport proposals.



- 6.17 Saxmundham Town Council are keen to see that if Sizewell C is to be approved then there must be appropriate improvements made to the surrounding road networks in order to avoid any unnecessary traffic through the surrounding towns and villages.
- 6.18 Clear signage is considered vital in order to properly direct any Sizewell related traffic. This approach will keep unwanted additional traffic away from the surrounding towns and villages, and it will also be beneficial to EDF Energy.
- 6.19 It is therefore suggested that there must be clear signage in both directions of the A12, in order to make it explicitly clear which routes are suitable for Sizewell related traffic. Saxmundham Town Council therefore proposes that on certain signs on the A12 specific reference to "Leiston" must be removed.
- 6.20 More options should be explored for parking in Saxmundham particularly with the original Hopkins Homes potential to explore the car parking spaces off Street Farm Road.
- 6.21 Saxmundham Town Council therefore wish to be involved in further discussions with EDF Energy, Suffolk County Council, and the Highways Authority in relation to highways issues in general, and improved signage around Saxmundham in particular.

## **7.0 EVIDENCE**

- 7.1 Saxmundham Town Council consider there is a fundamental lack of information provided by DDF Energy to this Stage 1 Consultation.
- 7.2 Additional transport related information must include:
- Transport Management Strategy, including construction strategy;
  - Improved rail information, including hours of movements;
  - Understand the impacts on the emergency services;
- 7.3 Socio-economic information must include:
- Impacts on local people, and how these are to be managed;
- 7.4 Saxmundham Town Council remain concerned there is currently insufficient information available to enable EDF Energy to move forward to a preferred options stage.

## **8.0 CONCLUSIONS**

- 8.1 Saxmundham Town Council are concerned with traffic impacts and impacts on the local residents.
- 8.2 EDF Energy must provide an overall transport management strategy which considers all of the inter-related transport issues together, and a strategy for dealing with the socio-economic effects associated with the proposed Sizewell C development.
- 8.3 Saxmundham Town Council are opposed to the greenfield sites being proposed by EDF Energy for the accommodation, 'park and ride', and visitor centre. Brownfield

sites must be considered and presented as alternative options in each of these cases.

- 8.4 Overall, Saxmundham Town Council support in principal, but consider that there is not enough information provided at the Stage 1 consultation to make informed choices.