

# **SIZEWELL C STAGE 2 PRE-APPLICATION CONSULTATION**

## **Representations from Leiston-cum-Sizewell Town Council**

### **SUMMARY**

The impacts on local residents and the impacts from the additional traffic are the primary concerns of Leiston-cum-Sizewell Town Council. Almost 90% of the construction will take place in this parish.

The current Stage 2 consultation has better detail than Stage 1 in many areas but still lacks accurate mapping and environmental detail. It does allow a better judgement to be made of the probable impacts however.

Whilst welcoming many of the socio-economic benefits that a major infrastructure will bring the main issues detailed below concentrate on the disruption and inconvenience the town will experience throughout the lengthy construction phase and also raises topics where mitigation could be included in your future plans.

Councillors and residents wish to stress their huge disappointment that this consultation has again taken place over the Christmas period which has put undue pressure on them to respond adequately during a traditional holiday and restful break. This must not happen for any further stage of community consultation.

### **1.0 INTRODUCTION**

1.1 These representations are made on behalf of Leiston-cum-Sizewell Town Council.

1.2 They represent the views of the elected members of Leiston-cum-Sizewell Town Council. This response was formally endorsed by the Town Council at its meeting on 24<sup>th</sup> January 2017.

1.3 This response is structured as follows:

- Section 2 - Addresses the overall principle of Sizewell C.
- Section 3 - Provides some local context to the area and sets out the principal concerns of Leiston-cum-Sizewell Town Council.
- Section 4 - Highlights the key negative impacts to beach access, natural and heritage assets.
- Section 5 - Identifies key socio-economic impacts of Sizewell C to the Leiston-cum-Sizewell.
- Section 6 - Presents mitigation measures to help alleviate negative impacts and secure positive impacts highlighted/identified in Section 4 and 5.
- Section 7 - Identifies transport impacts and required mitigation measures.
- Section 8 - Provides a response to the different options presented in the Stage 2 consultation material.
- Section 9 - Lists additional evidence required to support the Sizewell C proposals.

Appendix A – for purpose of clarity this provides a list of and rationale for all requested improvements to community infrastructure and amenity.

Appendix B - simple overview of response against the EDF Stage 2 Consultation Questionnaire.

## 2.0 NATIONAL ENERGY STATEMENT

- 2.1 It is the understanding of Leiston-cum-SizeWell 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 is potentially suitable for a nuclear power station.
- 2.3 What still hasn't been addressed 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, **albeit they currently seem to be being 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 Inspectorate who will pass on their recommendation to the Secretary of State to make the final decision on the site's suitability.
- 2.5 This does not mean therefore that Sizewell C will automatically be granted a Development Consent order.
- 2.6 There is also the fundamental concern of locating so much of the country's power supply in one area. Loss of transmission could lead to grid instability.
- 2.7 With this in mind, Leiston-cum-SizeWell Town Council have serious ecological and practical concerns for siting two more reactors in an AONB (and SSSI) and would insist that the issues set out in these representations are fully addressed and mitigated for should the Secretary of State subsequently consider this site to be suitable. It is assumed that the ONR will be providing a clear statement on whether they are content that the site is large enough to support two reactors and the ancillary equipment along with waste storage. The illustrative maps in this Stage 2 consultation do not appear to leave much leeway for any additional buildings that may become necessary and members are seriously concerned that any more land take that may become necessary, and that has not been planned for at this stage, will have a huge detrimental effect on the surrounding designated areas. They would therefore like assurance from ONR and EDF that this has been considered.

## 3.0 LOCATION OF LEISTON AND SIZEWELL

- 3.1 Leiston is a small market town that is adjoined by the hamlet of Sizewell, with a collective population of around 6,000. It is located on the coast between Lowestoft and Felixstowe. Leiston is served by a variety of shops, public houses, cafes, and restaurants. It also has its own recognised football club in the Ryman Premier Football League, a leisure centre, a Film Theatre and is home to the world renowned Long Shop Museum. It also adjoins the internationally famous RSBP Minsmere bird reserve.
- 3.2 The proximity to the coast and its position in the centre of the AONB means that residents and visitors to Leiston and Sizewell enjoy excellent access to the amenities offered by having the coastline on their doorstep and country walks all around the

parish. This includes good access to the beach for recreation including walking, dog walking, and swimming.

3.3 Leiston has recently completed its Neighbourhood Plan which, after 4 years' consultation and hard work, is going to referendum in February 2017. It encompasses many of the hopes and visions the town has for the next 15 years but deliberately does not incorporate any issues related to a potential Sizewell C. The document should be used by EDF however to assess the efficacy of supporting the town and entering into partnership with the town to work on the bigger projects with them as its major employer and neighbour for many years to come.

3.4 The impacts on their current amenities, and the impacts from the additional traffic, that are associated with the proposed development of Sizewell C, are a major concern for the residents of Leiston and Sizewell.

3.5 These impacts are of particular concern for Leiston and Sizewell during the construction period – especially the first two years.

3.6 It should be noted that there may be other large construction projects occurring in the parish that could overlap the first stages. These must be factored in will include dismantling parts of SZA and the relocating of facilities on SZB.

#### **4.0 LOSS OF ACCESS TO BEACH AND IMPACT ON NATURAL AND HERITAGE SITES.**

4.1 Leiston-cum-Sizewell Town Council is particularly concerned about the potential loss of public rights of way and any restriction of access, including access to the beach from the Kenton Hills and Goose Hills Walks and along the beach itself (part of the England Coast Path – a new National Trail).

4.2 Access to the public beach is a fundamental right of residents and visitors alike, this is going to be severely restricted with the proposal for Sizewell C.

4.3 Although EDF Energy are suggesting that public access will still be permitted along the length of beach in front of the proposed Sizewell C site during the construction period, it will be a loss of the current amenity and views enjoyed at present which must be carefully considered and mitigated for.

4.4 During the construction of Sizewell B a high chain-link fence with barbed wire on the top was used along the length of the restricted beach area. For Sizewell B this demarcated public footpath measured approximately 4m wide.

4.5 The fencing arrangement used during the construction of Sizewell B was poorly planned, and ultimately considered unsuccessful by local residents. The plans for Sizewell C look as though they have addressed this issue and, after the initial phase (when the access appears to be along the foreshore), there should at least be unimpeded views to the east for walkers using the recreational corridor. The landscaping and construction of this corridor must be sympathetic, aesthetic and a clear priority. The effect of a jetty, once that decision is made, will also need to be carefully managed, especially during construction as well as for the life of the facility.

4.6 During the initial phase a sturdy walkway must be laid on the shingle for less steady residents to walk along as walking on shingle is not easy.

- 4.7 *Leiston-cum-Sizewell Town Council would wish to discuss any proposed designs for beach restrictions with EDF Energy before they are presented at the next stage.*
- 4.8 It is noted that the existing track along the beach front is being used by the Civil Nuclear Constabulary. There is concern that EDF Energy will seek to use this existing track to access the rear of the site proposed for Sizewell C. Leiston-cum-Sizewell Town Council are keen to ensure that this existing track is not used by any vehicles to access the beach, other than security vehicles. This must be formally agreed in writing by EDF Energy as part of the any future development of the site and **included in areas of common ground.**
- 4.9 Leiston-cum-Sizewell Town Council also remains concerned about the impacts on the surrounding environment, including the Ramsar site of European importance, and the SSSI site of regional importance. The impact on other local heritage assets, such as Leiston Abbey, also still needs to be fully considered. The Town Council would support any representations made by our neighbours in the RSPB and those made by Natural England and the Environment Agency in this regard. EDF has a huge responsibility to protect our landscape if they are to be granted permission on this site.
- 4.10 The laydown area being proposed by EDF Energy is of a significant size, which will have an impact on its surrounding area too. The Leiston-cum-Sizewell Town Council have also identified several areas that must not be used as a laydown area. These include the area that overlooks Minsmere and the Minsmere Chapel ruins, the area of Lovers Lane that overlooks Leiston Abbey, and at Sizewell Gap that is locally identified as 'Pill Box Field'.

## **5.0 SOCIO-ECONOMIC IMPACTS**

- 5.1 Leiston-cum-Sizewell Town Council has identified the following socio economic impacts as a result of the Sizewell C proposals:
- Increased pressure on emergency services.
  - Potential negative impacts to some local employers but positive impacts overall in terms of local employment opportunities.
  - Potential positive impacts to local education, skills and vocational training opportunities.
  - Potential negative impact to the local economy following the peak of construction.
  - Increased visitor numbers to the town centre during the day and evening.
  - Distortions to the local housing market.
- 5.2 Where negative impacts are identified these should be mitigated for but equally important is that the positive impacts to the local economy are both secured and maximised.

### **Emergency Services**

- 5.3 Further development at Sizewell will require appropriate consideration with the emergency services. Additional risks associated with the construction and operation should be identified ahead of the project to enable adequate planning, resourcing, training, site familiarisation and equipment provisions for the emergency services. Any extra resources must be specifically bought in and must remain earmarked for the development. There should be absolutely no dilution whatsoever of current

resources before, during, and after construction. In the case of the police this should include extra personnel and vehicles permanently attached to the Leiston Safer Neighborhood Team, and a small response team based at Leiston Police Station. Evidential CCTV (not monitored) around the town (including residential areas in King Georges Avenue and Valley Road for when the caravan park is operational behind Crown Farm to protect workers and residents alike.) With the big increase in risk from extra traffic, heavy industry, hazardous materials and increased personnel in the parish a strategy must be looked at to protect the on-call firefighters in Leiston in particular. An increase in call outs will test the good will of the firefighters' employers so this needs to be addressed separately. EDF are also requested to look at how they would support the improvement of response times of our Ambulance Service to IP16 for their own peace of mind as well as to re-assure residents they wouldn't get even worse service due to increased traffic.

### **Local Job Market**

- 5.4 Previous experience with Sizewell has proved that the new jobs associated with the Sizewell C proposal will have an impact on the local job market. It is expected that EDF Energy will seek to employ a significant proportion of local people. Fair and equal opportunities need to be applied to recruitment for the Leiston-cum-Sizewell communities. Although it is noted that Sizewell C will have a potential effect on some local employers, Leiston-cum-Sizewell Town Council expects the local area to benefit from the employment opportunities that will be provided. It is expected and hoped that a Major Projects Agreement will be made with a Union to regularize the workforce.

### **Education, Skills and Vocational Training Opportunities**

- 5.5 Leiston-cum-Sizewell Town Council also wants to see EDF Energy continue to make positive contributions towards education in the area through their liaison with our local academies. EDF Energy would be turning Sizewell into a highly specialized and technical area for several decades to come, therefore it would be only appropriate that they should look to pass some of these skills and knowledge into the local area. They should also realise that ancillary skills and vocational training are just as important to support the estate and EDF are requested to look at establishing a training and skills centre in Leiston, either on their own, or with other energy companies including the NDA. **This would complement the project and remain as an important legacy in this area once the station is established. This could be achieved in Partnership with the Leiston First Board.**

### **Managing the Impact Post Peak Construction**

- 5.6 It is hoped and expected that a strategy is discussed and implemented in good time to manage the slump in employment after various phases of the construction programme. Leiston suffered from this during the previous builds and ways must be found to manage it.

### **Increased Number of Visitors to the Town Centre During the Day and Evenings**

- 5.7 It must be remembered that the non-home-based-workers will also have the freedom to travel when they are not at work. They will likely use their own vehicles or walk into surrounding areas for personal or leisure use. Previous developments at Sizewell have resulted in serious 'anti-social' behaviour in the town, which must not be allowed to happen again. A shuttle bus service into Leiston would benefit the

workers and help manage the car parking situation. The implementation of the proposed contractual drug and alcohol policy should also alleviate some of the worst problems and would allow workers to enjoy the town and also help businesses in the process. It is hoped that changing attitudes and better management will make the construction less challenging for the night time economy than was the case previously.

### **Distortions to the Local Housing Market**

- 5.8 Accommodation in the town is a big concern too. The demand for accommodation, some temporary and some more permanent, especially from better off workers, would distort the housing market in Leiston which, currently, is the only affordable area in East Suffolk. This would have a disproportionate effect on our young residents trying to get onto the housing ladder or rent at an affordable cost related to the low wages in the area. Members ask that EDF investigate a scheme to provide financial support to young local families affected by this to avoid them being priced out of the local housing market.

## **6.0 COMMUNITY BENEFITS**

- 6.1 This section concentrates on the mitigation measures required to alleviate the negative impacts, and to secure the positive impacts, identified under section 4 and 5 of this response.
- 6.2 The proposed cycleways and improved footpaths from Sizewell round to Eastbridge are welcomed. It is requested that a permissive path be installed under the 3-span causeway access bridge (Option 3) to allow residents to walk between the Kenton Hills walks and the beach as soon as possible during the construction phase. This would be a positive boon for residents and allow access to the Minsmere beach walks avoiding the need to negotiate the beach works and associated disruption. As the SSSI is being protected from the laydown a permissive path just outside the protected boundary from the laydown site would be very feasible, easily established and much appreciated. It would also allow a circular walk using the new bridleway for those who would enjoy that. This one addition would have a big community benefit. A small additional cycleway/footway from the junction of Valley Road with Lovers Lane down to the pelican crossing from Sandy Lane would also help residents and your workers cycling from the caravan park.
- 6.3 To help alleviate the impact of increased usage of the town's daytime and evening facilities, and to increase the amenity available for your workforce, the following mitigation measures are sought:
- Up-grading of the library.
  - Improvements to the swimming pool (see accommodation).
  - Sponsorship of, or partnership in the running of, the new community centre being considered on the redundant middle school site.
  - A small community donation to the Town Council to enable the town's public conveniences to be upgraded to 24/7 use for the night time economy (they currently close at 6pm as they are Victorian and vulnerable).
  - A small community donation to the Town Council to improve street furniture and play equipment. It would be good to present the town as best as possible for all visitors.

- 6.4 The most significant project which EDF would benefit from involvement with though would be the regeneration and construction of a new town centre as proposed in the Town's Neighbourhood Plan. This goes to referendum just after the Stage 2 consultation and will hopefully become a made plan by mid-February. EDF would be very welcome to work with the Leiston First Partnership (SCDC, LTC and LCDP) to help achieve a viable, sustainable and attractive development which would benefit all Sizewell workers now and in the future once Sizewell C construction is complete. EDF is Leiston's major employer and neighbour and it would be beneficial for everyone if they became a partner in the Town's future.
- 6.5 *Leiston-cum-Sizewell Town Council would therefore welcome the opportunity to discuss with EDF Energy the possibilities for improvements to the community. This must take the form of a joined up approach with the Town Council, residents, and other organisations, probably through the Leiston First Partnership.*
- 6.6 Further information on the community benefits and improvements being put forward by Leiston-cum-Sizewell Town Council are set out in Appendix A. This sets out the Town Council's assessment of immediate and long-term requirements, and should be used as the basis for any further discussions with EDF Energy on this particular issue. *EDF is encouraged to enter into meaningful discussions with the Town Council at the earliest appropriate phase of this project and before the public examination sessions with PINS.*

## 7.0 TRANSPORT

- 7.1 Leiston-cum-Sizewell Town Council is in favour of EDF Energy's proposed transport hierarchy: sea – rail – road. They welcome the increased detail in the proposals and respond accordingly.
- 7.2 Leiston-cum-Sizewell Town Council support the maximum by rail option but only if this is via the Green Route. A small temporary (and backup) railhead east of Eastlands Industrial Estate is only acceptable during the early construction phase and whilst the Green Route is being built although it is noted EDF wish to use the existing railhead for this phase. **For the Railhead and Eastlands options train movements should not be permitted between 2100 and 0700 hours due to the proximity of the line (and railheads) to residential areas.** It is therefore preferred that the Green Route is the chosen option. This would obviously then avoid double handling of freight and keep disruption to traffic in Leiston (two level crossings closed 20 times a day) down significantly. If Eastlands is considered it should only be as backup to sea freight strategy and this would be difficult to timetable with Network Rail and invariably be at night. Carr Avenue would suffer disproportionately. **Whichever route is ultimately decided upon an assessment of queuing time and impact on residents, workers at Sizewell B and Sizewell A and visitors, caused by the site access and train access at all the level crossings is essential. The time for each train to traverse each crossing must be included. This also affects emergency services.**
- 7.3 With the Green Route being the only acceptable route mitigation would have to be made for the first two years for freight coming through Leiston until it was in use. It would be totally unacceptable to have manned crossings anywhere on the route so automatic barriers would have to be installed, before day one, at King George Avenue and Station Road. When the Green Route is constructed, again, there needs to be automatic barriers on Buckleswood Road and Abbey Road. **It is not acceptable to block Buckleswood Road or any other road or to divert other**

**public rights of way for purposes of this construction.** (A bridge must be as costly as an automated crossing surely). The Green Route should be used to take traffic off Lovers Lane and must be the preferred route for all the construction companies to avoid loading and unloading twice. (\*Buckleswood Road closure would also have an unacceptable impact on local businesses).

- 7.4 The traffic flows from the models indicate the biggest impact on Leiston will be on Waterloo Avenue (Saxmundham Road). This is a difficult road to navigate and has been subject to a TRO to get it as free flowing as it currently is whilst still maintaining essential on street parking. It is a very uneven and pockmarked surface and is very noisy for residents on that road. A smooth noise treated surface would be required to ease this loss of amenity. A similar treatment should be given to the road through Knodishall right down Haylings Road to Kings Road.
- 7.5 *A clear picture of what is expected to happen in King George Avenue appears to be missing. The detail and proposed mitigation is required before the next stage of consultation. This is especially pertinent during the initial two years.*
- 7.6 If the Eastland's laydown area is pursued as the preferred option then EDF must remove the boundary of the site with the eastern end of Valley Road (locally named Kemps Hill) and widen this road down to the sewage treatment plant to allow large vehicles to access the treatment plant from Lovers Lane and to allow residents to safely use this road as a two-way carriageway. A cycleway would also have to be constructed behind the hedgerow on the Aldhurst Mitigation Site to allow residents to enjoy the current amenity they have to join up with the (new) bridleway and cycleway from Sandy Lane. This is the minimum mitigation for this option. If this option is not taken, then improvements to Valley Road down to the rail bridge would still be needed but the cycleway/footpath could be incorporated on the land take for the project to allow workers to access the town safely.
- 7.7 There needs to be a loop from Saxmundham to Wickham Market to ensure the East Suffolk Line (now finally on an hourly service) is not disrupted in any way by freight (like the Felixstowe line). **This would be unacceptable to all commuters and travellers who rely on this line.** Could freight to the site come predominantly from the north as there is possibly more space in the time table for that to happen and sidings are still in place at Lowestoft. A thorough assessment of the impact of long, slow moving, diesel goods trains on the wider East Suffolk and Liverpool Street line is essential to ensure that no conflict evolves with the Felixstowe container traffic and that no passenger service is affected. Locally this should include the impact of noise, vibration, air quality and disruption to other train and road users, and an impact study of using the line during anti-social hours and the disturbance to householders.
- 7.8 **Abbey Lane**, whichever rail route is proposed, will continue to be a massive rat run. It is unsuitable for the level of traffic it currently receives **and ways of improving it or managing it must be investigated in time for Stage 3.**
- 7.9 The Household Waste Site on Lovers Lane is a great community asset and an essential one for this whole area. **As a priority**, before the traffic flows increase along Lovers Lane improvements must be made to the site to make it safer to use for everyone's sake. This should be a perimeter road put in on EDF land so vehicles enter the site some distance after leaving Lovers Lane – this would give plenty of space to queue off road when the bins are being serviced (HGV entrance still from

Lovers Lane). If the current situation prevails there will be severe congestion and real road safety issues at this point (as is already the case). The County Council would need to relicense the site and they could possibly increase the capacity of the site at the same time.

- 7.10 The maximum by sea route sounds the best option but we suspect it may not be as practical as rail – we await EDF’s study results. There is huge concern about the effect on the delicate coastal process that either jetty will produce however and detailed work with the EA and MMO is ongoing we understand. There is concern about the permanence of the Beach Landing Facility and its potential to become an unwanted groyne.

### **Workers**

- 7.11 During peak construction, EDF Energy estimate that the workforce will be around 5,500 workers. EDF Energy estimate that approximately 36% of those will be home-based workers, and 64% {3,600} will be non-home-based workers. On completion of the build there will be continued peaks and troughs with three reactors undergoing rolling outages.
- 7.12 Leiston-cum-Sizewell Town Council is particularly concerned about the potential ‘informal’ car parking that may take place in and around Leiston and Sizewell. There is a genuine fear that some workers may opt to drive closer to work instead of using the ‘park and ride’ system. EDF Energy needs to set out how or if they intend to monitor or control their workforce using their cars, and what they intend to do about ‘informal parking’.

### **Buses**

- 7.13 The idea of park-and-ride is a positive one, which should in theory remove some potential private vehicle traffic from the roads surrounding Leiston and Sizewell.
- 7.14 There will however be a lot of bus movements per day, which is likely to create a constant flow of buses to accommodate the varied shift patterns. EDF Energy believes that spreading the workforce shift patterns throughout the day will avoid network peaks albeit there will be a constant stream of buses on the B1122 amongst the HGVs.
- 7.15 It is a fact that buses frequently hold up traffic and cause congestion. This is likely to increase congestion on the surrounding road networks, which will have an impact on residents, businesses, and visitors to Leiston and Sizewell, and how they get about their daily business. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 must be installed.

### **Heavy Goods Vehicles (HGVs)**

- 7.16 EDF Energy has estimated that at the peak of construction there could be up to 450 additional Heavy Good Vehicle (HGVs) movements per day (and 700 LGV) along the B1122. The Light Goods Vehicles not operating under the postal consolidation facility protocols however (350) may well choose the A1094 which will impact Leiston enormously. All HGV’s must have contractual requirements to exit the site via the B1122 to the A12 as well as arrivals.

- 7.17 As with the issue of buses, HGVs will cause congestion to the surrounding road networks which will have a knock-on effect to the residents and businesses of Leiston and Sizewell. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 and in Yoxford must be installed.
- 7.18 Leiston-cum-Sizewell Town Council is also interested to understand the methods EDF Energy plan to use to control the timing of HGVs both into and out of the Sizewell site.

### **Noise, Vibration, Dust and Air Quality**

- 7.19 Potential environmental impact is considerable and widespread everywhere you look. Coastal process, noise, air pollution/quality, flood risk, groundwater extraction, traffic and of course, disruption and loss of amenity for all the local residents (to name a few).
- 7.20 The issue of noise, air quality (including dust) and vibration in relation to local communities is of significant importance. Any assessment of the options is unable to be fully undertaken without this information at this early consultation stage. The EIA will be very comprehensive, large and difficult to understand in all likelihood and the fear is that the Non-technical summary will be too simple. **EDF are requested to produce something in the middle which details how they will be mitigating and monitoring all the expected threats to the environment.** This should include air quality monitors at junctions and rail crossings which send an alarm at certain levels, (for instance), automatically triggering pre-determined actions designed to ameliorate the threat. A base line must be established at all the expected trouble spots before construction begins and the limits agreed. Dust from the Borrow Pit operations is also of concern.

### **Overall Traffic Assessment**

- 7.21 It is considered that the steady stream of additional traffic throughout the days, weeks, months, and years during the construction of Sizewell C and beyond is going to have a noticeable and significant impact on Leiston and Sizewell and on residents who commute from the town.
- 7.22 Leiston-cum-Sizewell Town Council would prefer that no Sizewell C traffic passes through Knodishall or Leiston and are very concerned at the impact on the town centre during the first phase when access to the site will be through Sizewell B and Sizewell A. They understand the freedom local workers will have to choose their routing though so **EDF are requested to fund a study on all aspects of traffic movement around and through Leiston with a view to getting recommendations on control measures, signage and enforcement to ensure the correct routes are used and that the town centre does not suffer unduly.** *Leiston-cum-Sizewell Town Council also request that they be involved in these discussions from the outset as local knowledge (and current issues) are well known.* If this is done alongside the Town Council, this would give confidence that every available mitigation had been considered and assessed for feasibility. Even without this, designated routes must be discussed and agreed with EDF Energy, which must include an explanation of methods to be used for enforcing this. This may not be easy as we do understand, as mentioned, that local employees have the right to use

the highways as much as other residents. Protocols and inducements should be worked out though.

- 7.23 In summary, the additional HGVs and buses on the B1122, the potential for 'informal car parking' in the town, the control of traffic through Leiston overall and the town centre and the unknown late night running of freight trains, are of particular concern to Leiston-cum-Sizewell Town Council.

## 8.0 EDF ENERGY OPTIONS

- 8.1 Leiston-cum-Sizewell Town Council has the following comments to make on the different options presented in the consultation material that have an impact on both Leiston and Sizewell.

### Accommodation

- 8.2 Leiston-cum-Sizewell Town Council welcomes the option to incorporate a practical and well run accommodation complex within walking distance of the construction site. This will reduce car travel and bus journeys. Of the options presented it would be preferred if 2(ii) could be adopted as it is the smallest land take and allows for a legacy of sport and leisure to be sited in Leiston. No building should be more than 4 stories in this option however. The new road, cycleway and bridleway arrangements look manageable and safe and provide good connectivity for Leiston residents who take recreation across the Sandlings beyond Eastbridge. If option 1 is chosen, then it would seem preferable to include the new road to Eastbridge in the roundabout construction whilst leaving the bridleway crossing to the north on the Theberton Road.
- 8.3 It was hoped that smaller complexes around the area might have been considered as housing legacy. It is understood though, that despite the will this was not feasible for various reasons. Perhaps investigation could be undertaken to see what aspects of the options currently presented could be retained as a permanent legacy in the future. Premier Inn for Outages perhaps?
- 8.4 As Sizewell A is Government owned under the Nuclear Decommissioning Authority, EDF is encouraged to engage with the regulatory authorities to investigate using as much of the A site as possible – for example, the siting of accommodation on the A site should be considered as should the early clearance of the site.
- 8.5 There will be impacts on Leiston's infrastructure as a result of the proposed accommodation campus, which needs to be carefully considered. The off-duty workforce will have access to private vehicles and will undoubtedly visit Leiston for a variety of different reasons. Currently, Leiston will have difficulty in physically absorbing the demands of Sizewell's off-duty workforce, particularly parking. Therefore, the impacts on Leiston must be fully assessed and understood, **a shuttle bus would be useful in alleviating the parking issue.**
- 8.6 Any accommodation campus, wherever it is eventually located, must be built to a high standard of quality and design, as these will be a feature on the Suffolk landscape for a number of years. It is also requested that the accommodation units be dismantled as they become surplus to requirements throughout the project.

## **Park and Ride**

- 8.7 Leiston-cum-Sizewell Town Council are disappointed that brownfield sites weren't chosen for the park and rides but can see the practicality of the sites chosen. The Darsham option has the additional advantage of allowing workers to arrive by rail. The effect of bus travel to and from the site has been assessed and it is hoped that the system will be attractive to workers and well supported. The prospect of severe congestion at the Darsham site must be addressed and mitigated for otherwise the A12 at that point will become intolerable.
- 8.8 The Leiston-cum-Sizewell Town Council are adamant there should be no additional traffic through Leiston if at all possible. Ways of trying to reduce the predicted journeys through the town must be investigated and the Town Council would wish to meet EDF to examine local traffic management more forensically (see 7.22) – this would cover the other aspects of Lovers Lane, Abbey Lane and the C228.
- 8.9 A 'vehicle number plate recognition' system must be part of any solution and would be a way to monitor additional traffic in the town over the predicted levels EDF Energy currently suggests. This would then enable corrective policies to be put in place to counter the problem through the Community Construction Consultative Committee (name to be confirmed).

## **Lorry Parks**

- 8.10 In stage 1 the Town Council considered that the Orwell Lorry Park (Options 1 and 2) represent the best and most sensible options for lorry management. This was due to their location, their proximity to the A14, and the limited environmental impacts that would be associated with any development at this site. The removal of a lorry management facility and reliance on the park and rides seems shortsighted. A clear timeslot for each HGV will have to be managed and, if hauliers are left to try and match this themselves then the B1122 will become littered with loitering lorries. As soon as this happens then EDF must be prepared to act and act swiftly.

## **Transport Improvements**

- 8.11 Leiston-cum-Sizewell Town Council has been considering the options for highway improvements that are currently being put forward by EDF Energy at this Stage 2 consultation.
- 8.12 It is noted that any potential transport improvements must properly consider the emergency services, so that any potential impacts are understood. The Town Council would therefore welcome sight of responses from these organisations.
- 8.13 The B1122 is a vital transport route into the Sizewell site, and it is considered that it will need some considerable improvements to be able to continue to serve the nuclear power station well into the future. The Leiston-cum-Sizewell Town Council notes the minor improvements being suggested for improving the B1122 and consider them to be inadequate to mitigate or compensate for the huge load this route will take. Much more work has to be done on this as it is still considered that the air quality, noise and vibration issues will be outside acceptable limits in some areas and changes will need to be made.

- 8.14 It is important to remember however that the current EDF options do not represent all of the options that have been previously explored and put forward, either as part of earlier proposals for Sizewell or as other options for highways improvements in the area.
- 8.15 Sizewell has significant history, and various options have been discussed at different stages of development. The proposals for Sizewell C are going to have a significant impact on transport and traffic in the surrounding area, therefore **all** options need to be fully considered on the same and equal footing, in order that informed decisions can be taken.
- 8.16 All earlier options must therefore still be explored on completion of this Stage 2 consultation, even if it is to explain why they are not possible or practical to be considered.
- 8.17 Leiston-cum-Sizewell Town Council previously supported a route that offered improvements to the B1119, which was being discussed in 1988 as part of the “Sizewell Power Station Highways Improvement Proposals” consultation. This was known as Route D2, linking the Sizewell site to the A12 in the north. A link along similar lines remains an option as it would relieve traffic issues through the town. The Town Council would like this to be considered as part of the options for highways improvements or else a full explanation from EDF Energy as to why this option is no longer applicable for consideration. Exploration of a link route would also alleviate some of the problems and with the B1122. The improvements to the Yoxford junction would still need to go ahead though.
- 8.18 The entrance to the site on the B1122 should be redesigned and a T-junction incorporated rather than a roundabout. There should also be significant landscaping incorporated into this design to protect Leiston Abbey (and tourists traversing the parish) from seeing the accommodation and laydown immediately east of the junction.
- 8.19 At Farnham the two-village bypass initially looked to be a good option (at this distance) only as it provided a safer junction with Friday Street than the other options proposed. This part of the consultation should depend entirely on the views of the residents affected though and the Farnham resident’s views must be given primacy in the final decision. The two-village option, requested by the County Council I believe, may well be a stalking horse for the four-village bypass and therefore may be part of a wider agreement. If the residents prefer any of the other options Leiston would support their decision but strongly request that a roundabout at Friday Street still be built on road safety grounds (accident blackspot already).

## **9.0 EVIDENCE**

- 9.1 These representations have largely concentrated on localised amenity impacts and traffic impacts that will be associated with the proposed development of Sizewell C.
- 9.2 It is unclear and difficult to understand just how much impact the soil removal and borrow pits will make on the visual impact of the site. The mechanics of this will be examined by the Environment Agency but the heights and transportation aspects need more details. This aspect of the project has increased the land take of the AONB considerably and it remains to see whether the benefit of this outweighs the impacts (ie traffic impact of soil going elsewhere). It is expected that the County Council will comment more fully on this as well as the Environment Agency. For the

purposes of this consultation, with minimal understanding of the environmental consequences, Options 3 and 4 for the pits would be the only acceptable ones and would maintain the western side of Eastbridge Road clear of development. The Town Council looks forward to more discussion on this aspect in the near future though.

- 9.3 The Environmental Agency must be very clear that the proposals will not in any way affect the natural flow of the Leiston River or the operation of the Minsmere Sluice (including interfering with the coastal process via the emerging jetty proposals). There should also be an undertaking from EDF to pledge resources into ensuring that the outflow from the Leiston Water Treatment Plant will always be maintained to its current level so that no back up or flood problems occur in the future.
- 9.4 The overall land-take is also fundamentally questioned, as is EDF Energy's assumption that the temporary uses will only last for 10 years. With the current experience of Sizewell B, Leiston-cum-Sizewell Town Council would suggest that some temporary uses will last closer to 30 years. Further information on the temporary uses is therefore also requested with a clear timetable for decommissioning. It is also difficult to envisage where the new line is to the east of the site without accurate mapping. There is a green line from 1959 (Layfield Enquiry) which must not be breached. It does look as though the whole project is beginning to encroach unacceptably beyond this onto the beach. In line with the frontage of Sizewell B has to be the requirement.
- 9.5 **There are serious issues concerning Leiston-cum-Sizewell Town Council regarding potable water.** It is unclear from the information provided what the actual intake of water associated with Sizewell C is going to be for construction and operational purposes, and how much will be needed for the reactors. Leiston-cum-Sizewell Town Council has been informed that, with the intake of Sizewell B, the potable water situation in the area is currently only just in balance. Detailed drawings of how EDF Energy also plans to deal with the Leiston River also need to be clearly set out for consideration. Issues of drainage and run-off highlighted by the Minsmere Levels Stakeholder Group (of which the Town Council is a prominent member) must also be set out. These water issues must be discussed further with EDF Energy, Essex and Suffolk Water, and the Environment Agency. *A meeting with Essex and Suffolk Water to which the Town Council are invited would be a high priority request as the Environmental Agency are currently leaving this issue to EDF and the water company to sort out.* The Town Council would like to have their fears put at rest at an early stage.

## 10.0 CONSULTATION PROCESS

- 10.1 This additional stage of consultation was necessary and welcome. It added some detail and allowed more insight into the proposed activities. **Before moving onto Stage 3 however the Town Council would welcome additional talks with EDF to discuss the responses from this stage and to also be included in any discussions as they set out their preferred direction of travel to address them.** Any workshops or discussions with SCDC and SCC should, as a courtesy at this stage, now include an invitation for Leiston to have a representative present.

## 11.0 CONCLUSIONS

- 11.1 Leiston-cum-Sizewell Town Council cannot support the proposals for a further nuclear power station at Sizewell until the impact on amenities, environment and traffic are resolved satisfactorily in relation to Leiston and Sizewell.
- 11.2 The proposals will impact on people's ability to fully utilise existing public amenities. EDF Energy must fully set out how these are to be addressed, which must involve direct engagement with the Town Council, local residents, and local businesses.
- 11.3 Impacts on the beach, public rights of way, and areas of local, regional and international importance from a heritage and environmental perspective, must all continue to be fully and appropriately considered. The current suggestions are the minimum and must continue to be part of the proposals.
- 11.4 Issues associated with previous developments at Sizewell, including the loss and restrictions on public rights of way, and anti-social issues associated with such large scale development, must all be correctly addressed. The issues identified with previous stages of development of Sizewell should not be allowed to be repeated.
- 11.5 EDF Energy must provide an overall strategy for dealing with the socio-economic effects associated with the proposed Sizewell C development.
- 11.6 The transport options need further engagement to ensure as many possibilities as possible have been thought about and mitigated for as well as possible. The lead in, first two years, construction phase and commissioning (along with outages) mean that infrastructure put in now will have to serve a growing population in this area for up to 15 years. **Getting it right first time and to a high standard** will be of clear benefit to everyone.
- 11.7 Above all, any development at Sizewell C must seek to maintain a very high standard of design. The benchmark has been set with Sizewell B, and Sizewell C must seek to go beyond this in design terms as this is going to be a significant focal point on the landscape in this area for generations to come. The visual impact and intrusion into this important and heavily protected area must be carefully managed. The artist impressions at Stage 2 may not reflect the actual reality of what is proposed. This is based on the look of other EDF reactor complexes in France and is a concern as there is no confidence that this will be any different to those at the moment. The finished project will be unsightly (based on experience from other recent EPR projects) and this project, in essence, should just not be allowed to proceed at this site without substantial improvement to the fundamental design and material finishes. The reactors are also clearly not in line with SZB and the landscape impact of this cannot be mitigated.
- 11.8 Overall, it is considered that, with the appropriate mitigation set out here, the options supported above are best for Leiston-cum-Sizewell and should continue to be refined and negotiated with this Council to allow a fruitful and beneficial partnership to go forward for the years ahead.

## APPENDIX A

### Leiston-cum-Sizewell Town Council – Immediate and Long-Term Community Requirements.

It is believed that this project is of such a scale and is of such national significance that the normal criteria for Section 106 considerations is not sufficient to compensate the Parish of Leiston-cum-Sizewell for hosting and accommodating the vast majority of the disruption and inconvenience that will accompany the build. The long-term legacy of an access road across the AONB, a large prominent industrial complex on the heritage coast, also in the AONB, plus the plans to store spent fuel in the Parish for an indefinite period are also factors that need mitigation through various immediate compensatory measures and a long-term community fund.

The Town Council appreciate that the legal framework for such matters will be through the Principal Councils **but would request that strong support be shown by EDF to Leiston-cum-Sizewell’s aspiration for a certain percentage of any long-term community fund to be protected and earmarked for post code IP16** in which the whole of the works will sit. The Town Council is willing to administer any local fund should that be considered a better alternative and would be comfortable with a legal agreement to do so.

The required mitigation measures and community benefits that would help alleviate the impact of Sizewell C and meet resident’s needs are summarised below for further discussion with EDF and the Principal Councils.

Required Mitigation Measure/Community Benefit	Why it is required?
<p>Become a partner in the Leiston First Partnership with Leiston-cum-Sizewell Town Council, Suffolk Coastal District Council and the Leiston and District Community Partnership.</p> <p>See paragraph 6.4</p>	<p>To become an active partner in the regeneration and construction of a new Town Centre as proposed in the Town’s Neighbourhood Plan. EDF would be very welcome to work with the Leiston First Partnership (SCDC, LTC and LCDP) to help achieve a viable, sustainable and attractive development which would benefit all Sizewell workers now and in the future once Sizewell C construction is complete. EDF is Leiston’s major employer and neighbour and it would be beneficial for everyone if they became a partner in the Town’s future.</p>
<p>Replacement of the Dinsdale Road Toilets with a modern facility that could remain open 24/7 (currently closed at 6pm).</p> <p>See paragraph 6.6</p>	<p>To help meet the needs of an increased resident, worker and visitor population. This is the tourist and transport hub of the town and centre of the night time economy. It would be essential for EDF workers as well as residents.</p>
<p>Refurbish the changing rooms and other facilities at the Leisure Centre and provide new sports facilities in the town.</p> <p>See paragraph 6.3</p>	<p>Provided by British Energy with the B station, the changing rooms are in need of a major revamp. The accommodation option of installing improved facilities in Leiston would allow substantial improvements to be made to this centre for off duty campus residents to take advantage of too if completed in good time. Other enhancements to the sports facilities on this site, or elsewhere in the town, would benefit the Academies and local residents as a lasting legacy. The pool is an</p>

Required Mitigation Measure/Community Benefit	Why it is required?
	important and cherished legacy from the B station and EDF are encouraged to enhance this further. A project to install a 50m Olympic pool, along with Sport England and other partners may be of interest to EDF. LTC will address this separately.
Enhance existing cycle path along C228 and enhance visitor amenity at Sizewell Gap.  See paragraph 7.22	The cycle path proposals for Stage 2 are welcome and essential along the B1122 and Lovers Lane. The current cycle path to Sizewell would benefit from a refurbishment as would the Beach Cafe and facilities at Sizewell Gap to enhance the visitor experience. This would be essential for the first phase when all traffic will be going through Sizewell A and Sizewell B.
Improvements to Valley Road (East) aka Kemps Hill.  See paragraph 7.6	When the caravan Park and laydown/temporary railhead north of Crown Lodge are constructed this section of Valley Road should be widened and upgraded to allow HGV access from Lovers Lane to the sewage treatment plant. This road needs to be either two way or have a dedicated cycleway/footway put in alongside the existing narrow track. This would be a very useful legacy project that would benefit the town enormously and allow EDF workers to walk safely into town.
Highway low noise resurfacing from Highbury Cottages to White Horse Corner and through Knodishall all the way to Kings Road in Leiston.  See paragraph 7.4	Mitigation for the huge increase in private and white van traffic expected through these two entry routes, especially during the first two years. The noise from the poor surfacing at the moment is annoying and further increase in traffic would make it very uncomfortable, especially at night.
Strengthen the beach track that the Nuclear Constabulary use from Sizewell Gap to Sizewell C site.  Current issue.	This will protect the dunes etc. from further erosion and is work that currently needs done. The police will be more vigilant during construction one presumes and use it more so a small investment now would be very useful. (Notwithstanding a written agreement that this will not be used for Sizewell C work of any sort.)
Engage with the Leiston Works Railway.  Ongoing community engagement	Engagement with the industrial heritage of the parish by becoming involved with the Leiston Works Railway Project and looking at ways to possibly leave an impressive legacy from the rail works proposed for the construction. This would be an ongoing item and something to investigate.
Sponsor conference and breakout areas in Leiston Film Theatre.  Suggested mutual benefit	The Leiston Film Theatre is an impressive 250 seat auditorium which is set up for presentations, performances and lectures. EDF would benefit from the luxuriously appointed venue for corporate events but the lack of a breakout area currently precludes some type of events.

<b>Required Mitigation Measure/Community Benefit</b>	<b>Why it is required?</b>
<p>New community centre to provide facilities for larger meetings (it cannot currently host Sizewell Stakeholder group meetings), capable of hosting dances, badminton etc.</p> <p>See paragraph 6.3</p>	<p>To help meet the needs of an increased resident, worker and visitor population. The current Community Centre is a legacy Day Centre for the nearby sheltered accommodation and can only seat 60 people. The Town Council have been offered their site of choice which consists of part of the redundant middle school and the possibility of developing facilities on the adjacent school field (Secretary of State permission needed). The site is close to the town centre and the grounds could be easily turned over for outdoor activities (all weather, tennis courts etc.) and a small café and much needed toilets provided for users of the very popular adjacent Victory Park.</p>
<p>Sponsor the acquisition (if not already achieved) of the Council Offices in Main Street to turn into a Community Hub. Upgrade Leiston Library.</p> <p>See paragraph 6.3</p>	<p>Suffolk Coastal District Council own the premises and it is an aspiration for the Leiston First Partnership to gain the Freehold and turn the building into a community hub – this would allow the public toilets and the library improvements that are needed and allow a Tourist Information Centre style venue for all EDF workers and their families too.</p>
<p>Install evidential quality CCTV (unmonitored) in town centre, on King George Avenue and on Valley Road.</p> <p>See paragraph 5.3</p>	<p>This is for the safety of residents and workers alike.</p>
<p>A scheme be set up to provide financial support to young local families affected by the distortion of the local housing market</p> <p>See paragraph 5.8</p>	<p>Young residents will be adversely affected by the distortion to the letting and property market this project will cause. There must be some protection for them included in the mitigation.</p>
<p>A permissive path be provided from Kenton Hills to the beach under the access road as soon as possible.</p> <p>See paragraph 6.2</p>	<p>The access to the Minsmere levels along the beach will be ugly and difficult. The current access to the beach from Goose Hills is a major asset and allows the RAMSAR, SSSI and AONB to be fully enjoyed.</p>
<p>Household Waste Site on Lovers Lane realigned</p> <p>See paragraph 7.9</p>	<p>Road Safety</p>
<p>Substantial walkway to be laid across the shingle during initial beach works.</p>	<p>To allow less steady residents to negotiate the Coast Path.</p>
<p>A shuttle bus into town from the campus and the implementation of a strict drug, alcohol and acceptable behaviour policy.</p> <p>See paragraph 5.7</p>	<p>To alleviate anti-social behaviour and to allow workers to enjoy the night time economy responsibly.</p>
<p>Air quality, noise and vibration monitoring equipment be installed at pinch points and residential areas on B1122</p>	<p>To monitor congestion and health baselines along the transport route.</p>

## **APPENDIX B**

### **Consultation Summary**

EDF sought views on various options in their Consultation Questionnaire. A brief summary of our comments from the main response are included below.

#### 1. Overall Proposals

LTC feels that the site is too constrained and is unsuitable for such an ambitious project situated as it is amongst such a delicate and protected landscape. This, combined with all the associated development, will need an enormous amount of mitigation to ensure that the benefits outweigh the very serious impacts.

#### 2. Main development Site: Environment

There are so many factors to be considered in this that the main letter will have to be studied to ensure all our concerns are considered

#### 3. New Access Road

Option 3 – Three span bridge. See paragraph 6.2 for further detail.

#### 4. Managing construction materials

Option 3 – Field 3 and 4. See paragraph 9.2 for further detail

#### 5. Accommodation: Overall strategy

The chosen site for the campus makes best sense for the workers and reduction of vehicle use. Our points about the lettings and rental markets must be noted however.

#### 6. Accommodation: Campus layout

Option 2(ii) with leisure facilities in Leiston.

#### 7. Transport: Overall strategy

The rail and sea strategy is welcomed but is fraught with difficulties and needs more work (especially on timetabling). Disappointed that the lorry management facility no longer being considered. Park and Ride welcomed but will need careful management around the sites for traffic congestion.

#### 8. Transport: Rail

Option 1 – the “Green Route” only acceptable option.

#### 9. Transport: Sea

The Beach Landing Facility is of concern as it may become a groyne. LTC unqualified to assess whether wide or narrow jetty would be less damaging to the coastal process. The MMO and EA will have primacy on this point.

#### 10. Transport: Park and Ride

Comments included in response.

#### 11. Transport: Road Improvements A12

Farnham bends as preferred by Farnham residents.

#### 12. Transport: Yoxford/B1122

Traffic engineers will assess best option for junction so that egress from the B1122 is served best. Other proposals for B1122 are inadequate to mitigate the increase in traffic and associated air quality degradation, noise and vibration.

#### 13. People and Economy

In main text.

#### 14. Consultation Process

Completely let down by the timing unfortunately.