

# Leiston-cum-Sizewell Town Council



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30 January 2013

Our Reference: 036 280113  
Your Reference: Consultation Document Nov 2012

Sizewell Nuclear New Build  
FREEPOST LON20574  
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Dear Mr Mayson,

## **SIZEWELL C STAGE 1 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.

The current Stage 1 consultation lacks fundamental detail.

EDF Energy has not provided sufficient evidence and information at this Stage 1 consultation in order to make informed choices on the options that are being presented. It is difficult to see how EDF Energy will be able to move forward from the current Stage 1 consultation to Stage 2 without this information being provided. At the same time, it is also considered that EDF Energy is setting unrealistic timescales for consultation for a development of this nature and importance.

It is therefore requested that the additional information, particularly the transport related information and the socio-economic impacts on local residents, be provided by EDF Energy. The Stage 1 consultation must then be repeated, in order to allow proper and fair consultation to take place.

If this information is not presented then it is put forward that this Stage 1 consultation exercise is fundamentally flawed and that EDF Energy have not undertaken their required responsibilities. It is considered this does not represent 'adequate consultation' as is set out as a requirement in their own Statement of Community Involvement. Given

the importance of the proposed development, and the significant investment involved, Leiston-cum-Sizewell Town Council would also argue that 'adequate consultation' is simply not good enough.

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 on behalf of Leiston-cum-Sizewell Town Council.

1.2 They represent the views of the elected members of Leiston-cum-Sizewell Town Council.

## **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 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 However, it should not be assumed that Sizewell C will automatically be granted planning permission.

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 Town Council cannot support the proposal for a nuclear power station at Sizewell C until the issues set out in these representations are fully addressed.

### **3.0 LOCATION OF LEISTON AND SIZEWELL**

- 3.1 Leiston is a small town that is adjoined by the hamlet of Sizewell, with a collective population of 5,400. 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 Football League, and leisure centre.
- 3.2 Although not a recognised seaside town, the proximity to the coast means that residents and visitors to Leiston and Sizewell enjoy excellent access to the amenities offered by having the coastline on their doorstep. This includes access to the beach for recreation including walking, dog walking, and swimming.
- 3.3 The impacts on their current amenities, and the impacts from the additional traffic, that are associated with the proposed development of Sizewell C, are the major concerns for the residents of Leiston and Sizewell.
- 3.4 These impacts are of particular concern for Leiston and Sizewell during the construction period.

### **4.0 LOSS OF AMENITY FACILITIES**

- 4.1 Leiston and Sizewell are all too familiar with the development of nuclear power stations. The town and hamlet have already seen the developments of Sizewell A followed by Sizewell B grow up around them.
- 4.2 If the development is to be granted permission by the Secretary of State, then Leiston-cum-Sizewell Town Council wants to ensure that the lessons of the past are learned from and not repeated.
- 4.3 Leiston-cum-Sizewell Town Council is particularly concerned about the impact on the beach, which includes the loss and restriction of access and public rights of way, including access to the beach from the Kenton Hills and Goose Hills Walks.
- 4.4 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.
- 4.5 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 is the size and manner of this restriction that is of concern.
- 4.6 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.
- 4.7 The fencing arrangement used during the construction of Sizewell B was poorly planned, and ultimately considered unsuccessful by local residents. Restrictions on the beach meant that walkers were corralled into walking significant distances in tight and restricted spaces, hemmed in on either side by high security fencing, and surrounded on either side by plant and machinery associated with Sizewell B. This created a less than pleasant walking environment, with spoilt and interrupted

views, that was also considered unsafe by many. This is in comparison to the pleasant and open nature that should be enjoyed along the beach front.

- 4.8 It is considered that any restrictions being proposed would have an impact on people's ability to enjoy the beach as it has and should be used. Ultimately, it would result in less people using the beach for recreational purposes.
- 4.9 It must be remembered that some of the local economy benefit from public access to the beach, such as local cafes, restaurants, and shops attracting passing trade. If residents or visitors decide they are unable to access the beach for their preferred recreational uses as they have previously enjoyed, then they may choose to visit elsewhere. Therefore, Sizewell C and particularly any restrictive access to the beach will be having a direct impact on local businesses of Leiston and Sizewell.
- 4.10 Any restrictive access measures being proposed could themselves increase possible safety concerns, caused by the limited width of access for a long stretch of the beach. If less people decide to use the beach for recreational purposes because of the restrictions outlined, this will only increase the safety issue with less 'natural surveillance'.
- 4.11 Leiston-cum-Sizewell Town Council believes that EDF Energy must carefully consider any proposed arrangement for restrictions of the beach, particularly the size of access being proposed. 4m is considered to be far too restrictive, and should be at least 6m wide as a minimum, in order to allow a sense of openness, and allow for passing 'traffic'. This would go some way to improving and softening the appearance of any restrictions, both on access and views. It would also appear to provide a much safer option. Leiston-cum-Sizewell Town Council would welcome the opportunity to discuss any proposed designs for beach restrictions with EDF Energy.
- 4.12 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.
- 4.13 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 needs to be fully considered.
- 4.14 The laydown area being proposed by EDF Energy is of a significant size, which will have an impact on its surrounding area. The Leiston-cum-Sizewell Town Council have also identified several areas that must not be used as a laydown area, as is currently being proposed by EDF Energy. 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 FACTORS**

- 5.1 Any further development of Sizewell will have a knock-on-effect on Leiston. This may bring some benefits, through employment and business, but it will also have many detrimental effects to residents, public amenities, local amenities and some local businesses.
- 5.2 EDF Energy must provide an overall strategy for dealing with the socio-economic effects associated with the proposed Sizewell C development. This does not appear to have been considered by EDF Energy.
- 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 Neighbourhood Team, and a small response team based at Leiston Police Station. Evidential CCTV around the town (including residential areas if KGA accommodation approved) should be installed (not monitored) to protect workers and residents alike. A small custodial centre may also be needed closer than Martlesham.
- 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 must be provided.
- 5.5 Leiston-cum-Sizewell Town Council also wants to see EDF Energy make positive contributions towards education in the area. This could be through improvements to math's and sciences in primary and high schools, offering training and apprenticeships, and improving the access and knowledge to the profession of engineering. 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. This is seen as mutually beneficial, and the Town Council wishes to discuss this further with EDF Energy.

5.6 There is also concern about how EDF Energy proposes to gradually run-down their employees after the peak of construction, as this will equally have an impact on Leiston.

## **6.0 COMMUNITY BENEFITS**

6.1 Leiston and Sizewell are going to be significantly affected by any development at Sizewell. These include direct and indirect impacts on local amenities and local businesses.

6.2 Should the proposal for Sizewell C be approved in the future, Leiston-cum-Sizewell would expect to see a series of specific community benefits explored and implemented to alleviate the impacts and disruption on the amenities currently enjoyed by the residents and visitors of Leiston and Sizewell.

6.3 There needs to be improved footpaths and cycleways to improve the linkages between Leiston, Sizewell, and the surrounding area.

6.4 From a wider perspective there should be improvements to the household waste recycling centre, up-grading of the library, improvements to the swimming pool and community centre, the town's public conveniences, and the town centre in general. All such facilities will be subject to an increased level of usage by Sizewell related employment.

6.5 Leiston-cum-Sizewell Town Council would therefore expect the opportunity to discuss with EDF Energy the possibilities for improvements to their community. This must take the form of a joined up approach with the Town Council, residents, and other organisations, in order to achieve the best collective solutions for the area. For example, this stage would include discussions with the police who are keen to support additional CCTV in the town. The police may also require further up-grades to their existing facilities. The Leiston-cum-Sizewell Town Appraisal 2011 should form an integral part of these discussions.

6.6 Further information on the community benefits and improvements being put forward by Leiston-cum-Sizewell Town Council is set out in Appendix 1. 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.

## **7.0 TRANSPORT**

7.1 Leiston-cum-Sizewell Town Council is in favour of EDF Energy's proposed transport hierarchy: sea – rail – road. However, the lack of information on each of these transport mediums means this aspect of the consultation is flawed.

7.2 It is difficult to determine, with any degree of certainty, the impacts from each of the proposed transport options being proposed when there is clear lack of detail provided at this stage.

7.3 It is suggested that sea and then rail will be main forms of transporting freight to and from the Sizewell C site, but no details are provided. Yet, there is some limited information provided on road movements, which appears to be enough for EDF Energy to state there will be ‘only a modest addition to daily traffic flows’ (para 7.3.4 of the Transport Strategy). It is suggested that there is insufficient information on all transport matters for EDF Energy to be making these assumptions at this stage.

#### *Freight by Sea*

7.4 EDF Energy state that a significant proportion of the delivery of freight will be by sea. The use of the sea is supported.

7.5 However, there is almost no information provided with this consultation in relation to how the sea is to be utilised. There is insufficient information to allow an accurate assessment of delivery of freight by sea, rail and road to be undertaken.

7.6 Leiston-cum-Sizewell Town Council is also concerned at the jetty that is being proposed. The size, scale, design and construction need to be understood before a full assessment of its impacts on the existing visual amenity can be made.

7.7 It is noted in section 8 of the Transport Strategy that the “Jetty Proposals” will form part of the Development Consent Order Application. It is considered this will be too late in the process, and if EDF Energy is to undertake ‘adequate pre-application consultation’ it is suggested this level of detail should have been supplied in advance of the application.

#### *Freight by Rail*

7.8 EDF Energy states that rail will play an important role in the delivery of freight during the construction of Sizewell C. The use of this existing form of transport is also supported.

7.9 In this instance, only very limited information has been provided by EDF Energy. If properly considered and designed it is felt that direct links into the Sizewell site via rail would not only assist with the transport of freight during construction, but it could also assist beyond construction as well. Rail could also be used to assist with the transport of workers to and from the site, and it is strongly urged this is explored further.

7.10 In relation to EDF Energy’s proposed route options for extending the Saxmundham-Leiston Branch Line (set out in Figure 6.3 of the Transport Strategy), the Blue Route is the preferred option of Leiston-cum-Sizewell Town Council. However, environmental issues must still be overcome.

7.11 Although this will have some visual impact on the surrounding countryside, the Blue Route is considered a better overall option as it goes directly into the Sizewell site, and will have less impact on the existing residential properties of Leiston, especially if there are some night freight movements.

- 7.12 The Green and Red Routes would both have steep gradients to overcome, and both come much closer to residents of Leiston.
- 7.13 It is positive that EDF Energy have acknowledged the issues of passing residential properties in Leiston (para 6.7.19 of the Transport Strategy). However, Leiston-cum-Sizewell Town Council is concerned at the reference to “*some freight train movements may need to occur at night*”. The amount and frequency of ‘night movements’ does 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. It was also considered important that all crossings must be fully automated, and the track doubled between Saxmundham and Wickham Market instead of the proposed loop at Wickham Market. This would allow greater flexibility.

#### *Freight by Road*

- 7.14 EDF Energy openly acknowledges that there is going to be additional traffic on the surrounding roads as a result of Sizewell C. This will consist of HGVs, buses, vans, and private cars that will be associated with construction materials and employees with the proposal during the construction period and beyond.
- 7.15 Although the proposed routes do not pass through the centre of Leiston it is fair to say that the proposed development Sizewell C will have significant traffic impact on Leiston, which must be understood.

#### *i) Workers*

- 7.16 During peak construction, EDF Energy estimate that the workforce would be around 5,600 workers. EDF Energy estimate that approximate 34% of these will be home-based workers, and 66% will be non-home-based workers.
- 7.17 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’.
- 7.18 It must also 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 would alleviate some of these problems.

#### *ii) Buses*

- 7.19 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. It would be useful if EDF Energy could give evidence of a successful ‘park and ride’ scheme they have been involved in.

- 7.20 It has been estimated that there will be over 200 bus movements per day, which is likely to create a constant flow of buses throughout the day to accommodate the varied shift patterns. As stated in paragraph 7.6.3 of the Transport Strategy, EDF Energy believes that spreading the workforce shift patterns throughout the day will avoid network peaks.
- 7.21 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.

iii) *Heavy Goods Vehicles (HGVs)*

- 7.22 EDF Energy has estimated that at the peak of construction there could be up to 600 additional Heavy Good Vehicle (HGVs) movements per day.
- 7.23 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.
- 7.24 Leiston-cum-Sizewell Town Council is also interested to understand the methods EDF Energy plan to use to control the HGVs both into and out of the Sizewell site.

*Noise and Vibration*

- 7.25 The issue of noise 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.
- 7.26 An appropriate noise and air quality assessment is therefore required to be prepared and consulted on before any decision can be taken on any of the options being proposed in the Stage 1 consultation. It would be erroneous to provide this information after decisions have already been taken.

*Overall Traffic Assessment*

- 7.27 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 some impact on Leiston and Sizewell.
- 7.28 Leiston-cum-Sizewell Town Council does not want any Sizewell C traffic to pass through Knodishall and Leiston. Designated routes must be discussed and agreed with EDF Energy, which must include an explanation of methods to be used for enforcing this.
- 7.29 The additional HGVs and buses, the potential for 'informal car parking', and the unknown late night running of freight train, are of particular concern to Leiston-cum-Sizewell Town Council.
- 7.30 EDF Energy has provided limited transport information, notably on the expected impacts with what they are proposing. Noise and vibration must be fully and properly explored before any decisions on any of the options can be taken. If this

information is not provided in a timely fashion then a full assessment of all of the options presented will not be possible.

- 7.31 Any transport options for sea, rail or road, must be accompanied by a full environmental assessment which considers the impacts of any proposal. Until all of the options are set out, including the appropriate assessments of these options, then people cannot provide an informed view to this consultation process, and equally EDF Energy should not be allowed to progress further to a preferred options stage.

## **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.

### *Visitor Centre*

- 8.2 The proposals to include a permanent visitor centre for Sizewell is considered to be positive, and is welcomed.
- 8.3 Leiston-cum-Sizewell Town Council's preference is for the existing visitor centre at Sizewell B to be reused as this would represent the most efficient use of land and resources, and ideally not a further greenfield site. It is noted that the existing centre has not been included as a possible option, and the Town Council would like a full explanation from EDF Energy why this site has not been considered for consultation.
- 8.4 Following a full and proper explanation, if re-using the existing centre is not possible, then the Town Council consider that any visitor centre should be located in close proximity to the Sizewell site, and should ideally be easily accessible to both walkers and cyclists. This would offer the most sustainable option, rather than being reliant on private transport.
- 8.5 The option for Lover's Lane is therefore not considered to be the best or most practical option, due to its location, its remoteness, and its limited walking and cycling options.
- 8.6 Any temporary or permanent visitor centre must be carefully designed to a high quality and standard, which must be sympathetic to its surroundings. The Town Council would expect to be party to any further discussions in relation to the visitor centre, including siting and design.

### *Accommodation*

- 8.7 Leiston-cum-Sizewell Town Council is particularly concerned at the size of the accommodation sites that are being proposed. It is considered that the approach EDF Energy is currently following of having all 3,000 workers on one site is a flawed approach. The Town Council believe this will lead to significant problems and issues, for both the selected campus and on nearby towns and villages, such as Leiston.

- 8.8 The impacts of the proposed accommodation campuses on nearby towns such as Leiston does not appear to have been fully considered by EDF Energy. It must be remembered that Leiston has existing experience of the socio-economic impacts associated with living next to a nuclear power station, and the particular difficulties encountered during the construction period.
- 8.9 There will be impacts on Leiston's infrastructure as a result of any of the proposed accommodation campuses, 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 not be able to physically absorb the demands of Sizewell's off-duty workforce. Therefore, the impacts on Leiston must be fully assessed and understood, with any necessary improvements factored into the consideration of the different options being proposed.
- 8.10 Currently, none of the proposed campus accommodation sites are considered to be suitable, and Options 2 and 3 are completely inappropriate.
- 8.11 All three options are considered to be too large if intention is to house the entire workforce on one site. Option 2, identified as the Sizewell Gap option, is unsuitable because of its environmental impacts on the local important landscape. Option 3 is considered wholly inappropriate due to its proximity and direct impact on Leiston.
- 8.12 Leiston-cum-Sizewell Town Council considers that there is merit in building some permanent accommodation in appropriate locations. Further discussions with EDF Energy would be welcomed on this issue.
- 8.13 The preferred approach of Leiston-cum-Sizewell Town Council is for several smaller campus sites, which are located further away from the Sizewell plant. EDF Energy must therefore look to explore further options in the wider area before being able to move forward with a preferred choice for the accommodation campus(s).
- 8.14 Splitting the accommodation over several smaller campuses will reduce the direct impacts on any one particular nearby town or village. If appropriately located, the campuses could also offer the workforce a wider choice of recreation options, for example if there was a campus accommodation that was easily accessible to Ipswich or Lowestoft.
- 8.15 Proposing campuses further away from the Sizewell plant should also increase the usage of the proposed 'park and ride' facilities. This would increase the amount of buses through certain towns and villages, but this would be preferable to a significantly larger number of cars. Although this may not appear most practical to EDF Energy who may prefer their workforce living almost 'on-site', from an environmental and sustainable aspect this is more acceptable. It would also show a level of understanding and co-operation between developer and local residents, who need to continue to live and work together if they are to move forward.

- 8.16 It is currently difficult to visualise exactly what the campus accommodation will eventually look like and the impacts they will have the landscape and environment, and EDF Energy have not provided that level of detail with this initial consultation. This must follow shortly before any decisions on preferred locations are made.
- 8.17 Any accommodation campus, wherever it/they are 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.

#### *Park and Ride*

- 8.18 Leiston-cum-Sizevell Town Council considers that none of the proposed 'park and ride' sites are currently suitable, as they are all on greenfield sites. Other brownfield sites should be considered first, and it is unclear what assessment EDF Energy had made prior to arriving at the north and south options.
- 8.19 More information on the current 'park and ride' options is required. It is also considered that additional sites, further away from the current north and south options, must also be considered as part of this process, as all of the possibilities have not been fully explored.
- 8.20 The Leiston-cum-Sizevell Town Council are adamant there should be no additional traffic through Leiston.
- 8.21 The Town Council are therefore very interested to understand how EDF Energy plans to manage the traffic to and from the Sizewell site and the park and ride sites. A possible 'vehicle number plate recognition' system may be one possible way to monitor additional traffic on the town that EDF Energy suggest will not be there. The Town Council would like the opportunity to discuss this further with EDF Energy.
- 8.22 Leiston-cum-Sizevell Town Council reserves the right to comment on the preferred 'park and ride' locations in the future, when more detail must be provided.

#### *Lorry Parks*

- 8.23 It is considered that the Orwell Lorry Park (Options 1 and 2) represent the best and most sensible options. This is due to their location, their proximity to the A14, and the limited environmental impacts that would be associated with any development at this site.

#### *Transport Improvements*

- 8.24 Leiston-cum-Sizevell Town Council has been considering the options for highways improvement that are currently being put forward by EDF Energy at this Stage 1 consultation.
- 8.25 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 assurances from EDF Energy that the emergency services are being properly considered.

- 8.26 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 is therefore particularly keen to understand how EDF Energy proposes to manage the necessary upgrading works required for the B1122.
- 8.27 However, it is important to remember 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.
- 8.28 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 needs to be fully considered on the same and equal footing, in order that informed decisions can be taken.
- 8.29 All earlier options must therefore also be explored as part of this Stage 1 consultation, even if it can be explained why they are not possible or practical to be considered.
- 8.30 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. This 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 route D2 may also alleviate some of the problems with the B1122.
- 8.31 Leiston-cum-Sizewell Town Council remains unconvinced about the merits of the improvements to the Farnham Bends that are currently being proposed.
- 8.32 Leiston-cum-Sizewell Town Council would also support the inclusion of the previous “Four Villages Bypass” within EDF Energy’s proposals, as part of further consultation. In order to make a full and proper assessment at this stage, *all* of the possible options need to be set and explored before any decision can be reached. It is considered that EDF Energy have currently only presented a limited selection of the possible options for the road improvements in the area.

## **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 has been highlighted that there are some significant omissions within the EDF Energy information at this Stage 1 Consultation that is needed in order to provide a full and correct assessment of the options presented.

9.3 Additional transport related information must include:

- Details of how 'the sea' will be used with the delivery of freight;
- Details of the jetty proposals;
- Details for new road construction, instead of 'lines on maps';
- Construction management strategy;
- Details drawings for consideration;
- Details of how EDF Energy propose to deal with Leiston River, with part of the proposed development being shown to be built over part of the river as there is serious concern about potential flooding in the area as a result. A full Environmental Assessment will be required for any future application;
- More widely circulated information on coastal processes, as part of the evidence base and not just part of the consultation process;
- Improved rail information;
- What happens in case of an emergency?;
- How the construction is to be managed;
- The hours of vehicle movements;
- Monitoring of workforce vehicles;
- Assessment of non-Sizewell related vehicle movements;
- Impacts on local people, and how these are to be managed;
- Understand the impacts on the emergency services;
- What investigations have been carried out in deposition and erosion;
- Noise and air quality assessments;
- Consideration of impacts on the local communities and their infrastructure;
- The decommissioning of the temporary accommodation, such as the 'park and ride' sites needs to be set out;
- How long is the 'spent fuel' to be stored? A clear strategy needs to be set out;
- Assessment of impacts on tourism.

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 in reality the temporary uses will last closer to 30 years. Further information in the temporary uses is therefore also requested.

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, 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 River Leiston 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.

- 9.6 EDF Energy must not be able to move forward to a 'preferred option stage' (Stage 2) until this information is presented.
- 9.7 It is considered that this information and evidence may influence opinion towards one option or another, by demonstrating that one option is actually better or worse than the others.
- 9.8 Overall, Leiston-cum-Sizewell feel the information and evidence provided by EDF Energy falls significantly short of what is required for this stage of pre-application consultation. A lot of questions remain unanswered, and decisions on the options presented cannot be taken until this is provided.

## **10.0 CONSULTATION PROCESS**

- 10.1 It considered the current consultation process has been too short and is lacking in significant amounts of detail.
- 10.2 It is accepted this is the start of the consultation process, but EDF Energy must not be permitted to move towards any preferred options, which is being referred to as 'Stage 2' in the consultation process, on the amount of information that has currently been provided.
- 10.3 Need to maintain continuing dialogue with EDF Energy.

## **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 and traffic are resolved 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 be fully and appropriately considered.
- 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 All transport options, particularly road improvement options, must be fully explored. This must include the previous route D2, and the “Four Villages bypass”.
- 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
- 11.8 Overall, it is considered that insufficient evidence and information, particularly transport information, has been provided to allow a full and proper assessment of the options presented at the Stage 1 consultation.

Yours sincerely

J. M. Rayner  
Town Clerk

**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 however is willing to administer any local fund should that be considered a better alternative.

Items that would help alleviate the impact of Sizewell C and meet resident's needs (as shown in last year's Town Appraisal) are listed briefly below for further discussion with EDF and the Principal Councils.

The current Community Centre is a legacy Day Centre for the nearby sheltered accommodation and can only seat 60 people. It cannot even host Sizewell Stakeholder Group Meetings. The Community has asked for another Centre to be built capable of hosting dances, badminton and all the other activities one would expect to happen in a Community Centre. The site of choice would be the Middle School Playing Field which is close to the Town Centre and where the grounds could be easily turned over for outdoor activities as well (all weather, tennis courts etc.) as part of the ongoing schools reorganisation in Suffolk.

Mentioned in the report, Dinsdale Road Toilets need replacing with a modern facility that could remain open 24/7 (currently closed at 6pm). This is the tourist and transport hub of the town and centre of the night time economy.

The changing rooms and certain other facilities at the Leisure Centre, provided by British Energy with the B station, are in need of a major revamp and this would be very useful for off duty campus residents to take advantage of too if completed in good time.

Cycle paths – essential along the B1122 should no alternative be found to using this route. From Lovers Lane through to the Westleton turn off at least and would have to be inside the fields probably. This would allow the good links to be maintained with the Suffolk Cycle Routes.

Enhancement of the cycle path to Sizewell and help with refurbishment of the Beach Cafe and facilities there.

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.

Provide an extension to the Film Theatre to upgrade the changing facilities to allow large shows to be put on. This would benefit residents and workers alike throughout construction. It would also allow good breakout and post conference facilities should EDF wish to use the venue during construction.

The Council Offices and Library are a good community building which sorely need upgrading and a lift installed. Suffolk Coastal District Council own the premises but it is an aspiration for Leiston-cum-Sizewell Town Council to gain the Freehold when circumstances allow. EDF's help in this would be very beneficial.

It is expected that the County Council will cover many Highways issues but there are some works in the Town Centre which would make travel, shopping and recreation much more accessible and pleasing. Various ideas for pedestrianisation and one way systems have been modelled and the increase in economic and social activity in the town might benefit from revisiting these.

Finally, it would be appreciated if EDF could fund the works needed to strengthen the beach path that the Civil Nuclear Police use along the current stations frontage as this will protect the dunes etc. from further erosion.

It has to be mentioned as it is always raised. Would there be any way a scheme could be put in place for EDF to provide free or vastly discounted electricity to residents around the EDF plants for the duration of their generation life?