

Little Glemham Parish Council

Response to Stage 3 Pre-Application Consultation for Sizewell 'C' Nuclear Power Station

March 2019



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1 Synopsis

As the principal concern of the village is the impact of the additional traffic generated by the construction and subsequent operation of Sizewell 'C', this document will focus mainly on the transport issues and their positive and negative effects.

The document will also consider the wider economic, social, environmental and educational aspects of the development inasmuch as they are likely to affect the parish.

While Little Glemham Parish Council accepts the need for a nuclear power station and welcomes the wider socio-economic benefits that the construction and subsequent operation of Sizewell 'C' nuclear power station may bring to the area, there is a lack of detail in some of the proposals. Also, we believe that the proposals to mitigate the effect of the increased traffic are inadequate, as listed in para 7.1 of this document.

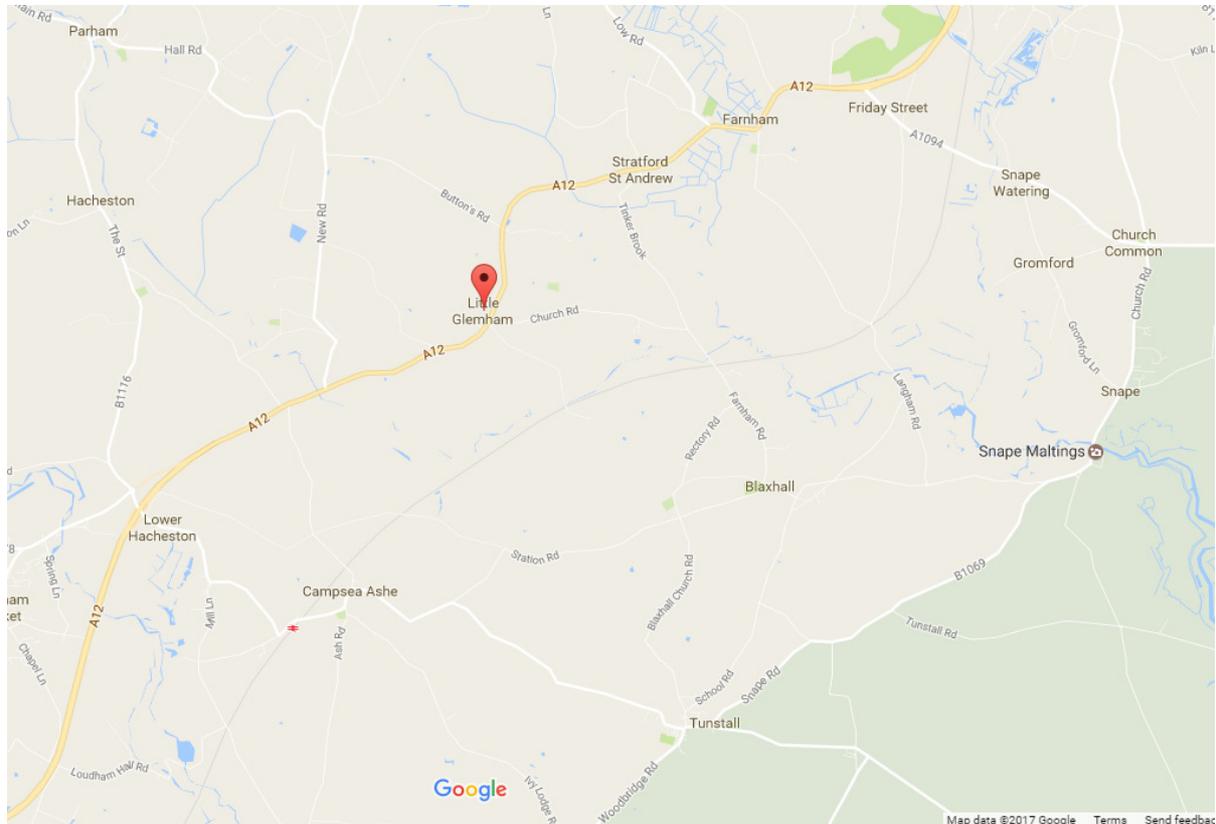
If topics are not mentioned, it may be assumed that the Parish Council has neither a positive nor a negative view on their impact.

1.1 Situation of Little Glemham

Little Glemham is a small village within Suffolk Coastal District Council. It lies between the larger settlements of Wickham Market to the south and Saxmundham to the north. It has a population of approximately 200, and has a public house (The Lion Inn) and a village hall.

As with many villages, Little Glemham has grown up along the main road through the village. Over the years this main road has become the A12. The A12 is an important strategic route. In addition to serving the tourist areas on the coast from Aldeburgh to Southwold, it also serves the industrial and port areas of Lowestoft and Great Yarmouth and is the only route from the south to the Sizewell site.

The village of Little Glemham now straddles both sides of the A12.



Any additional traffic impacts on the A12 south of Sizewell will therefore equally have an impact on the village of Little Glemham.

1.2 Impacts

Because the village is bisected by the A12, it is frequently necessary to cross the road to access services, such as the public house, village hall and bus services. This is already difficult due to traffic levels and the increase in traffic will exacerbate the problem. It is particularly difficult for children, push chairs and the elderly. The proposed Two Village Bypass will do nothing to mitigate this problem. Also, further measures to improve the single carriageway section are needed. The Parish Council is also concerned about the pressure on local services, such as health and education, the emergency services and on the road network in and around the nearest local centre of Wickham Market.

2 Main Development Site – Managing Construction Materials

Little Glemham supports the principal of keeping construction materials on site as this will reduce the need for vehicle movements off-site. Delivery of bulk materials to site is best accomplished by rail for the same reason.

In the event that it is necessary to remove unwanted material from site, the preferred method would be by sea as it would be removed to a coastal site but it is noted that this option has been removed from the Stage 3 proposals. Alternatively freight trains that would otherwise return empty could be used. Road transport should be a last resort. It is unclear whether the use of road transport for this purpose has been taken into consideration in the comparison of the rail and road led strategies.

The Parish Council has no opinion on the suitability or otherwise of the borrow pit options.

3 Accommodation – Overall Strategy

The influx of a large number of workers to the site is bound to have a negative impact overall, particularly for those communities that adjoin the campus. However, the on-site campus is considered to have a mitigating effect on traffic through the village.

There will be some negative effects caused by non-home based workers travelling home, the shift pattern is designed to facilitate this, also workers will wish to travel outside the local area using their own vehicles for leisure purposes. This can be mitigated by providing good social and entertainment facilities on-campus.

The accommodation strategy could have the following adverse socio-economic impacts:

- I. Additional pressure on medical facilities;
- II. Private rents could be pushed upwards by market pressures, particularly at the lower end of the market;
- III. Scarcity in the areas closest, particularly at the lower end of the market.
- IV. Tourist accommodation could be occupied by workers who are likely to spend less money in the local economy than tourists.
- V. House prices could be pushed upwards due to longer term workers buying houses and moving their families to the area and also by increases in buy-to-let.
- VI. Houses being multiply-occupied by several single people requiring parking for several vehicles.

We consider that the following measures would mitigate the impact:

- I. Provide comprehensive medical facilities on site and/or provide extra funding for existing local facilities;
- II. Provide incentives for workers wishing to live with their families to commute rather than buy or rent property, either by travel allowances, or allowing a proportion of travel in work time;
- III. Only using tourist accommodation out of season.
- IV. Widely advertise for spare rooms in private houses;
- V. Bring empty property back into use. This could have a positive legacy effect.

4 Transport – Overall Strategy

4.1 Approach on Sea and Rail

The strategy of using sea and rail for the movement of freight is considered positive as it will remove traffic from the road network, in particular abnormal indivisible loads can be delivered by sea rather than causing congestion on an already congested road network. However the option of a jetty for sea-borne freight has been removed from stage three, leaving only a beach landing facility for abnormal indivisible loads and increasing pressure on road and rail.

The East Suffolk Line runs along the eastern boundary of the Parish and is sufficiently far from the main settlement for the noise and vibration to be acceptable during the day. The rail loading gauge would probably prevent the railway being used for anything other than transport of bulk materials such as cement and aggregate.

4.2 Park & Ride Facilities

This is considered to be positive in terms of reduction of car traffic on the A12 and on the approaches to the site, however these benefits will be offset by increased bus traffic. Park & Ride Schemes tend not to be popular, so it is essential that its use is made compulsory and rigorously policed. It is recognised, however, that the sites will have a significant adverse visual impact on the surrounding area.

4.3 Postal Consolidation Facility

This is considered to be positive. With the advent of private courier firms, there is the possibility of a vehicle making a journey to the site simply to deliver one package. A worthwhile reduction in road traffic can be achieved by saving them up until a full van load has been collected. It should also be used for private correspondence for the residents of the accommodation campus.

4.4 Accommodation Campus

From the point of view of traffic reduction, the co-location of the campus with the construction site has a positive benefit since nearly half the workforce would not have the need to travel to work on the local road network. However, the addition of a large population, probably mainly consisting of young single men, to a rural area could give rise to social problems and cause anxiety among the permanent residents.

We suggest the following mitigation measures:

- I. A mandatory code of conduct, backed by disciplinary action;
- II. Good social and entertainment facilities on campus, to be shared with workers in private accommodation;
- III. Funding for extra police presence in the local area.

These measures are necessary in our view in order to reduce the incentive to leave the campus and to ensure acceptable standards of behaviour outside the campus.

5 Transport

5.1 Transport –Sea

It is no longer proposed to use jetty-based sea transport for freight. This will result in an increase in freight that has to be delivered either by road or by rail, resulting either in a large increase in road traffic or extensive upgrades to the rail line. The latter would leave the project dependent on the ability of a third party, Network Rail, to deliver the work in a timely fashion. Little Glemham welcomes the proposal to use sea transport for large indivisible loads. Most of the road network leading to the site is single carriageway, often narrow and winding, and moving these loads by road will inevitably lead to long delays, not only for the local population but also for other construction traffic. We have no preference for any particular landing area, other than the proviso that it must be capable of handling the largest loads.

5.2 Road-led vs. Rail-led

Two alternative strategies are proposed. Road-led would involve carrying the extra freight that would have otherwise been delivered by sea to a jetty, by road, resulting in an average of 750 HGV movements per day

and 1500 at the peak. (Table 6.1). There would also be two freight trains per day. This would not require any changes to the East Suffolk line, but the Saxmundham to Leiston branch would need to be upgraded.

In the case of the rail-led strategy, there would be 450 movements (900 peak) plus five freight trains per day. This would entail extensive changes to the East Suffolk line including the closure or upgrading of 64 level crossings (this figure includes the Saxmundham to Leiston Branch) and the construction of a passing loop between Campsea Ash and Melton, plus a track upgrade to the Saxmundham – Leiston branch and changes to the track layout at the Saxmundham junction.

5.3 Freight

The movement of materials by rail is considered positive as it remove a substantial amount of heavy goods vehicle traffic from the roads, most if not all approaching from the south. Of the two options proposed, the Parish Council strongly favours the rail-led strategy over the road-led as this would require 300 fewer HGV movements per day at peak. The five freight trains per day envisaged would not add significant impact to that of the existing rail traffic and the proposal not to run freight trains through the night is welcomed. There are no level crossings within the parish but the closure of Blaxhall 2 would sever footpath Little Glemham 10, which continues over the crossing as Blaxhall 37. Which of the two diversions (paras 9.3.48 & 9.3.49) would depend on the outcome of an enquiry.

5.4 Passengers

There is an hourly service in each direction between Ipswich and Lowestoft. The East Suffolk Line is unlikely to have a high take-up for transporting workers because:

- I. The service starts after the start of the first shift and ends before the end of the last shift;
- II. The journey times are long in relation to the distance travelled;
- III. The service is already full at peak times;
- IV. Car parking at the intermediate stations is very limited.

This view is supported in para 14.4.8 of Volume 1.

If it is decided that there is a demand, then the rail operating company could be approached to run extra trains at the start and end of the day and longer trains at peak times during the day. Because much of the route is single track it would probably not be feasible to increase the frequency beyond the current hourly service and it would be more beneficial to the environment to run freight trains if there is extra capacity.

6 Transport - Park & Ride

Little Glemham welcomes the principle of Park and Ride as a means of reducing road traffic. Our main interest is in the southern site, situated about 1.5 miles south of the village in the neighbouring parishes of Marlesford and Hacheston. This site is well placed to capture traffic arriving from the west via the B1078. Examination of the shift patterns suggests that operation would commence at about 5 am and continue until after midnight with a major peak in mid-afternoon due to shift changeover and other peaks during the morning and evening rush hours due to single shift workers and office-based workers.

We consider the positive impacts to be:

- I. Up to 2500 car movements will be taken off the road each day;
- II. Postal consolidation will reduce LGV movements;
- III. There is a potential for local employment.

The Parish Council is concerned about the following negative impacts:

- I. Congestion on the northbound off-slip from the A12 to the B1078. There are already occasions when traffic queues from on the A12 and the extra traffic can only exacerbate this.
- II. Congestion on the existing B1078/B1116 roundabout. This is part of the main route to the centres of Wickham Market and Framlingham where shops and schools are situated. The shift patterns suggest that there will extra traffic during existing busy periods.
- III. Congestion in the Wickham Market area due to traffic approaching from the B1078.
- IV. Safety issues due to poor visibility for traffic joining the B1078 from the southbound off-slip.

- V. Safety issues due to traffic joining the A12 via the southbound on-slip being hidden from southbound A12 traffic on the approach to the junction.
- VI. Noise, vibration and air pollution from the buses.

The Parish Council suggests the following mitigation measures:

- I. Either lengthen the northbound off-slip to give more capacity for queuing traffic or re-align it so that it connects directly with the roundabout;
- II. Remove vegetation from the areas around the B1078 bridge to give better visibility for joining traffic;
- III. Remove vegetation and lower the banking from the western edge of the southbound on-slip in order to enable A12 traffic an earlier view of joining traffic;
- IV. Use modern buses that comply with the latest environmental standards.

7 Transport – Road Improvements A12 & Surrounding Area

The northbound A12 has a bottleneck at Farnham Bend. This is a tight bend with housing on either side and with insufficient room for two heavy goods vehicles to pass. It is a cause of congestion which, in busy periods such as the holiday season, can cause queuing traffic to tail back into Little Glemham and substantially increase journey times. The Parish Council has assumed that all traffic predicted at Farnham will also pass through Little Glemham. While we accept that it is not for planning application to solve existing problems, applicants must be expected to contribute appropriately if they add to existing problems.

7.1 Two Village By-pass (Section 12)

The positive aspects are:

- I. It would reduce the likelihood of queueing traffic and thus the likelihood of noise, vibration and air pollution although this will still be increased ;
- II. It would not impact on access to and use of the Riverside Centre;

The Parish Council is concerned about the following negative impacts:

- I. Loss of trade for the petrol filling station and convenience shop at Stratford St. Andrew. This is a vital local amenity;
- II. Reduction of property values along the A12;
- III. Increased traffic through the village, which this option would do nothing to mitigate;
- IV. There are two busy junctions in the Parish, at Buttons Road (opposite Glemham Hall) and Church Road in the village centre. The former provides the preferred access to Parham Industrial Estate and the compost recycling centre for goods vehicles and the latter carries HGV and agricultural traffic from various vegetable processing facilities and a turf nursery as well as serving the residential properties in Church Road. Both junctions are narrow and HGVs require the full width of the A12 in order to turn out. The picture on the next page shows a vehicle turning into Buttons Road from the south.



Also delays and tailbacks often occur when vehicles wish to turn right into these turnings and are unable to do so because of a stream of traffic coming in the opposite direction. The extra traffic generated by Sizewell 'C' can only exacerbate this problem, leading to increased journey times for local traffic and Sizewell 'C' traffic itself;

- V. Because of the narrowness of the road and lack of parking places, delays frequently occur due to deliveries, buses stopping etc. The weekly bin collection always causes delays. These delays will be exacerbated by the increased traffic;
- VI. There will be increased noise, vibration and air pollution. Little Glemham lies in a hollow and the noise etc. generated by vehicles as they accelerate up the gradient either side can be considerable, particularly if they are forced to slow down or halt at the Church Road junction. We note that no assessment has been carried out;
- VII. The proposed shift patterns suggest that the length of the working day will be considerably extended, running from around 5 am to after midnight, with concentrations of bus traffic at the start and end. The noise that is generated early in the morning and late at night is less acceptable than if it were during the daytime;
- VIII. Although the shift patterns are timed to finish outside peak hours, the requirements of single-shift workers and office workers will extend increased traffic into peak hours, causing congestion not only within the village but also on the routes into Framlingham and Wickham Market in the vicinity of the Park and Ride;
- IX. The consultation document appears to underestimate the effect of heavy goods vehicle traffic which, at the peak, doubles the existing level adding an extra 960 HGVs and buses per day for the rail-led strategy and 1470 for the road led. In the worst case, ie the road led strategy at peak and we take this to be spread over a working day of 17 hours (07.00 to midnight) then this equates to one every 41 seconds. In the case of the rail led, there will be less traffic but it will be spread over a shorter working day and with more in the morning, so the benefits of the rail-led strategy at times when people most likely to be using the road are perhaps not as great as they may at first appear. Because of the narrow and winding nature of the A12, opportunities for overtaking are very limited and HGVs tend to attract a "tail" of vehicles. This bunching of traffic makes it very difficult to exit properties and side roads on to the A12. Also, bearing in mind that Little Glemham is bisected by the A12, there is a need for pedestrians to cross in in order to access buses and other facilities. The doubling of HGV traffic will make this situation much worse;
- X. An increase in traffic is bound to lead to more accidents. In the event of an incident there are no diversion routes that are suitable for heavy goods vehicles or large volumes of car and light commercial traffic, which would not be the case if a four village by-pass were to be built.. While it is recognised that lorry holding areas are available, many deliveries are likely to be of a "just in time" nature and prolonged delays may inconvenience site work.

- XI. The position of the roundabout at the southern end of the Two Village Bypass is unsatisfactory. It is shown in Fig.12.1 to be situated just north of the junction with the U2315, a road that is used by heavy goods traffic from farms and businesses in the Blaxhall area, as well as access to the Blaxhall motor cycle circuit. Traffic turning in and out of this junction is likely to delay traffic entering and exiting the bypass.

We consider that the following additional mitigation measures are necessary:

- I. Provide signage at either end of the by-pass directing traffic to the petrol filling station and shop;
- II. Move the roundabout south so that it connects directly with the U2315. This will have the additional advantage of incentivising drivers to use this route rather than the awkward Church Road junction.
- III. Re-model the Buttons Road and Church Road junctions to allow easier egress by long vehicles or make Church Road "Access Only" for HGVs between the U2315 junction and the A12;
- IV. Provide financial assistance for the occupiers of properties, abutting the A12 in Little Glemham and Marlesford, that are adversely affected by the increased traffic;
- V. Consult with the emergency services to formulate a contingency plan that can quickly be put into effect to divert traffic in the event of an incident, but even if this is done, closure of the A12 would cause severe congestion in the surrounding villages, such as Snape, Great Glemham and Campsea Ashe.

However, Little Glemham Parish Council believes that the only way that the above negative impacts can be fully mitigated is by the construction of a four village by-pass.

7.2 Wickham Market Area

Wickham Market is the nearest local centre to Little Glemham, with shops, a primary school, a medical centre and a dentist. There is therefore a need for residents to visit Wickham Market on a regular basis. The B1078 passes through part of the village, joining the High Street at Border Cot Lane, and is a busy route between the A14 and the northbound A12. It is likely to be popular with Park and Ride users as the alternative is twelve miles longer and passes over the Orwell Bridge, as well as meeting peak hour congestion in the Martlesham and Woodbridge areas. The project team have suggested two alternative schemes to mitigate the increase in traffic and consequent delays and congestion resulting from Sizewell traffic. It is essential that whatever scheme is implemented, delays and congestion must be minimised in order to prevent vehicles resorting to "rat runs" over unsuitable narrow local roads.

7.2.1 Parking Ban

Currently parking is allowed down one side of the High Street between Border Cot Lane and the River Deben Bridge, meaning that two way traffic is often not possible. The proposal is to provide car parking facilities away from the High Street and to ban parking there allowing traffic to flow more freely. This is completely unacceptable. Not only would it be deeply unpopular with local residents, the road is narrow with narrow footpaths and the faster moving traffic would lead to more noise and vibration and an increased risk of accidents.

7.2.2 Diversion

It is proposed that traffic be diverted away from the village altogether passing down Valley Road, over Glevering Bridge and joining Easton Road. Traffic would then proceed along Easton Road and join the B1116 at the existing junction, which would be widened. Of the two options, this is the more attractive, however the road is very narrow in places, has sharp bends and passes over the single track listed Glevering Bridge as well as over a flood plain and close to an equitation centre. EDF claim that this is acceptable because their traffic management scheme would prohibit HGVs from using the B1078, however this only applies to Tier 1 contractors, sub-contractors may use large vehicles and if the route exists, it may also be used by uncontrolled non-Sizewell traffic. The proposal could be greatly improved if a short link road could be built to by-pass the problematic parts of the route and could remain as a useful legacy. The Council supports the views of Wickham Market Parish Council in this matter.

7.3 B1078

The B1078 is a heavily used route linking the A14 to the A12. The Council welcomes the proposed improvements to the A140/B1078 junction, but is surprised that nothing has been proposed for the village

of Coddendam, which has a sharp blind corner as well as parked cars down one side of the road, resulting in alternate single line traffic.

8 People and the Economy

8.1 Employment

Little Glemham Parish Council welcomes EDF's policy to recruit home-based workers where possible, not only for the economic benefits to the area but also to minimise the pressure on local accommodation.

8.2 Tourism

Little Glemham Parish Council believes that the overall effect on Tourism will be negative due to the proximity with Minsmere and the Area of Outstanding natural beauty. The proposed visitor centre is welcomed but is unlikely to be a tourist attraction in its own right. The consultation does not appear to consider the impact on tourism. There appears to be a presumption that the cost of tourist accommodation will discourage workers from using it, though this has yet to be proven.

We suggest the following mitigation measure;

- I. Provide funding for the promotion of tourism in the coastal area;

8.3 Accommodation

EDF estimates the total number of non-home based workers to be 3600. With a campus capacity of 2400, this leaves 1200 to be accommodated in the open market. We welcome the proposal to set up an accommodation management office to direct workers away from areas of accommodation pressure, but it is difficult to see how effective this will be in practice in an open market. We support the proposal to use "latent" accommodation (paras 4.2.6 and 4.3) and to bring empty homes back into use. Census data has been used to determine the number of "spare rooms" in the area, but the number that occupiers are willing to make available for letting is likely to be small. The proposed provision of a caravan site will help to ease accommodation

The consequence is likely to be price increases in both owner-occupied and privately rented accommodation, which may be viewed as positive by owners and landlords but negatively by prospective purchasers and tenants. There may also be pressure on tourist accommodation.

We suggest the additional mitigation measures:

- I. Only direct workers to tourist accommodation out of season and for short lettings that do not extend into the season;
- II. Encourage single workers privately renting to share accommodation;
- III. Incentivise workers to live at home and commute.

8.4 Pressure on Local Services

8.4.1 Health

While the proposal to provide occupational health services on site is welcomed, many workers will be non-home based and may move their families, including children to the area. Also, the occupational service on site may find it necessary to refer patients to the local NHS. The local GP surgery is already operating at capacity and extra load may be placed on hospitals.

8.4.2 Education

Wickham Market Primary School has some spare capacity, but local secondary schools are either already fully subscribed or are likely to become so in the future due to house building in their catchment areas.

8.4.3 Emergency Services

It is not anticipated that the development will incur any increased demand in the area local to the parish, but that is less likely in and around the construction site. Building sites are, by their nature dangerous places and the influx of population to the Leiston area could place extra demands on the police service. Also the nature of the surrounding roads means that emergency vehicles could take longer to reach

casualties, necessitating use of the Air Ambulance. Should these demands be met from existing resources, there will inevitably be an impact on services and response times elsewhere.

8.4.4 Mitigation Measures

The following are suggested:

- I. Provide funding for extra health and education facilities where a need can be identified. This should include not only GPs surgeries but main hospitals and clinics;
- II. If not already planned, there should be fully trained and equipped firefighters and paramedics on site during all working hours, in line with other large industrial sites;
- III. Fund a police officer or officers for the Leiston area;
- IV. Contribute to the funding of the East Anglian Air Ambulance, which is a voluntary organisation.

8.5 Education and Training

We welcome EDF's skills, education and employment strategy and urge that it is started as soon as possible and continued through the construction phase and beyond in order to provide opportunities for today's schoolchildren at all levels up to the very highest professional levels.

9 Consultation Process

Little Glemham Parish Council is disappointed by the short timescales allowed for the Stage 3 process.

We are also disappointed by the fact that, in spite of the fact that two years have elapsed since the Stage 2 consultations, much of the information provided consists of statements of intent, rather than concrete proposals or evidence that what is proposed has worked elsewhere. The proposals outlined would be much more convincing were they to have been backed by experience gained during the Hinkley project.

Examples include:

- Traffic management;
- Accommodation;
- Employee conduct
- Socio-economic impact.

This makes it difficult to submit an informed response to some of the points raised. Also, it has not been possible to judge the validity of some of the assumptions made, in particular the "Gravity Model".

10 Conclusion

The chief concern of Little Glemham Parish Council relates to the impact of construction and Park and Ride traffic on the village and the surrounding road network. Much of the mitigation proposed appears to be inadequate. There are also concerns about the impact on local services by the influx of a large population and their families and dependents.