

SIZEWELL C

STAGE 1 CONSULTATION

Representations on behalf of Little Glemham Parish Council

SUMMARY

The A12 is a major transport route in the region, providing vital linkages between Ipswich, Lowestoft and Great Yarmouth. Any additional traffic onto the A12 will therefore have an impact on the operation of this important infrastructure, which will have much wider subsequent economic affects, as well as more local impacts.

Sizewell C will increase the volume of traffic onto the A12. The impacts of this increase must therefore be properly modelled and considered, before any appropriate mitigation measures can be assessed. To assess mitigation before any impacts have been measured is erroneous.

An appropriate 'evidence base' has been provided to accompany the Stage 1 consultation.

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.

Due to this lack of evidence and information it is difficult to see how EDF Energy will be able to move forward from the current Stage 1 consultation to Stage 2.

It is therefore requested that the additional information requested within these representations is provided and that the Stage 1 consultation is then repeated, in order to allow proper and fair consultation to take place.

This includes additional transport information and figures, noise and air quality reports, and a modelled assessment of the options and alternatives relating to a full "Four Villages Bypass".

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 set out as a requirement of the own Statement of Community Involvement.

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 Little Glemham Parish Council.
- 1.2 Although Little Glemham remains part of the 'Four Villages Bypass Group', these representations are put forward to this stage of the Sizewell C consultation solely on behalf of Little Glemham Parish Council and the local residents which they serve.

2.0 NATIONAL ENERGY STATEMENT

- 2.1 It is the understanding of Little Glemham 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 be granted planning permission.
- 2.6 With this in mind, Little Glemham cannot support the proposal for a nuclear power station at Sizewell C until the surrounding transport issues are properly addressed, as set out in these representations.

3.0 LOCATION OF LITTLE GLEMHAM

- 3.1 Little Glemham is a small village within Suffolk Coastal District Council. It has a population of approximately 200, and has a public house (The Lion Inn) and a village hall.
- 3.2 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, and the importance of this road has grown over time becoming the main route linking some of the region's most influential towns.
- 3.3 The village of Little Glemham now straddles both sides of the A12.

- 3.4 Any additional traffic impacts on the A12 south of Sizewell will therefore equally have an impact on the village of Little Glemham.
- 3.5 Traffic related issues are therefore the main concern for Little Glemham with the Sizewell C proposal.

4.0 TRAFFIC

- 4.1 EDF Energy acknowledges that there is going to be additional traffic on the A12 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.
- 4.2 EDF Energy also acknowledges that the single carriageway sections of the A12, including the “Four Villages” of Farnham, Marlesford, Stratford St. Andrew, and Little Glemham, are more “sensitive stretches of the A12”.
- 4.3 Therefore, it is agreed that some of this additional traffic on the A12 will pass through Little Glemham.
- 4.4 Consequently, it is fair to say that Sizewell C is going to have some impact on the village. It is the extent of this impact that needs to be understood.

Workers

- 4.5 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.
- 4.6 Some of these home-based workers will use the A12 and will pass Little Glemham on a daily basis, at least twice a day. Some of the non-home-based workers may also pass Little Glemham at various points during the week, either to travel to or from the park and ride, or to the EDF Energy provided accommodation units.
- 4.7 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 in the area for personal or leisure use.
- 4.8 EDF Energy needs to set out how or if they intend to monitor or control their workforce using their cars. Some workers may drive to or close to work instead of using the ‘park and ride’ system. More information is required on the proposed parking permit system, as set in para 5.4.8 of the Transport Strategy.

Buses

- 4.9 Although the idea of the park-and-ride is a positive one, all of the southern options will mean that there will be additional bus traffic passing through Little Glemham to ferry workers to and from the site.

- 4.10 This will present a large increase in bus traffic through the village throughout the day, and is likely to be more constant due to the varied shift patterns and the numbers of worker involved. 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.
- 4.11 It is a fact that buses frequently hold up traffic and cause congestion. This is likely to increase around the “Four Villages” as the speed of the dual carriageway drops to a single carriageway. This congestion will only be compounded with more adverse weather conditions.
- 4.12 Buses are therefore likely to be a significant contributor to traffic impacts on Little Glemham, and will cause continued difficulty in linking both sides of the village due to associated speed and congestion.

Freight by road

- 4.13 EDF Energy has estimated that at the peak of construction there could be up to 600 additional Heavy Good Vehicle (HGVs) movements per day. It expects that the majority of this (85%) will be coming from the south using the A12.
- 4.14 HGVs are categorised as vehicles over 3.5 tonnes, but EDF Energy has not specified what size and type of HGV vehicle they will be using. It is assumed they will be using a variety of HGV types.
- 4.15 Light Goods Vehicles (LGVs) are defined as vehicles up to 3.5 tonnes, and includes vans and 4x4s. EDF Energy expects there could be up to 510 additional LGV movements per day during the construction peak.

Noise and Vibration

- 4.16 The noise and vibration is also of particular concern to the residents of Little Glemham. It is noted that EDF Energy state “it is not currently anticipated that there will be major impacts in terms of noise and air quality on the four villages or other stretches of the A12 arising from the Sizewell C traffic, although this conclusion will be subject to further work”.
- 4.17 The issue of noise and vibration in relation to local communities is of significant importance. Any assessment on the options is unable to be fully assessed without this information at this consultation stage. It is also interesting to note that although no assessments have been carried out, EDF Energy still do not anticipate any problems. Little Glemham do not share or take any comfort in EDF Energy’s anticipations.
- 4.18 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

- 4.19 EDF Energy's Transport Strategy estimates that the total traffic impact on the A12 associated with the construction and operation of Sizewell C would be in the region of a 5–15% additional traffic increase.
- 4.20 EDF Energy suggest this "*represents only a relatively modest addition to daily flows*" on the A12.
- 4.21 Little Glemham consider that the additional traffic associated with Sizewell C will be a significant amount.
- 4.22 A figure or a percentage could be seen to a small or minimal amount, but this must be considered against the existing local circumstances which in this case are associated with the village of Little Glemham.
- 4.23 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 significant impact on the village of Little Glemham.
- 4.24 The additional HGVs and buses are of particular concern to Little Glemham. The associated congestion and potential problems in adverse weather conditions will only serve to increase the difficulty in crossing the road, and add to the severance of the village.
- 4.25 Noise and vibration must be fully and properly explored before any decisions on any of the options can be taken.
- 4.26 An increase in traffic is likely to increase the number of accidents in the area and on the A12. This is likely to result in more diversions, which will mean further impacts on the surrounding villages and lesser road networks as a result of no bypass.
- 4.27 There is insufficient transport information provided in relation to the use of road, rail, and particularly sea, to enable a proper assessment of the proposed options to take place. More detailed information on the robustness of transport mode options is therefore required before EDF Energy should be allowed to progress further.

5.0 FOUR VILLAGE BYPASS

- 5.1 A bypass of the 'Four Villages' along the A12 (Farnham, Marlesford, Stratford St. Andrew, and Little Glemham) has been discussed for many years. This is acknowledged by EDF Energy.
- 5.2 In 1995 the issue of a "Four Village Bypass" was properly and fully explored. At the time it was supported by the affected villages, Suffolk Coastal District Council (SCDC) and Suffolk County Council (SCC). A full dual carriageway scheme was then supported by a Planning Inspector at a Public Inquiry. Unfortunately, due to funding it was not able to be brought forward at that time.

- 5.3 The “Four Village Bypass” was again considered and supported by Suffolk County Council in 2006. The evidence prepared to support the Cabinet Report (Ref: CO6/92 19th December 2006) indicated there was a clear transport and economic case for a full bypass, which was fully supported by a consultation undertaken at the time. Further development at Sizewell was also considered to be an important factor at this time.
- 5.4 An “A12 Four Villages Study – Environmental Constraints and Opportunities Report” was also prepared by The Landscape Partnership as part of the “Four Villages Bypass” evidence. It stated that although there were no international features that would be affected by the proposed bypass, there would be other landscape, environmental and heritage impacts that would need to be addressed. It did not conclude that the bypass would be unacceptable, as EDF Energy have misinterpreted in their Transport Strategy (para. 7.3.7). It is a fact that any new road is going to have some environmental and visual impacts, including the proposed Farnham Bypass, but it is how these are addressed that is important.
- 5.5 Ultimately, it was agreed by SCC Cabinet in 2006 that a full “Four Villages Bypass” represented the best possible solution under the circumstances. SCC continues to hold this view, that it remains the best long term solution to this increasing traffic issue in this area.
- 5.6 Since 2006 there have been significant changes to local, regional, and national planning policy. Suffolk Coastal District Council has prepared their Core Strategy, which was recently discussed at an Examination in Public. The East of England Plan was revoked in January 2013. In March 2012 the Government replaced the previous PPSs and PPGs with the National Planning Policy Framework (NPPF), where the emphasis is on sustainable development. These significant policy changes mean that something like Sizewell C must continue to consider all of the appropriate aspects associated with their development, including environmental impacts, transports impacts, local impacts, as well as economic impacts. This is of course set against policy requirements for nuclear power stations.
- 5.7 It is considered that emergence of the Sizewell C application now represents an appropriate time to fully re-explore the bypass opportunities and implications.
- 5.8 EDF Energy state that it would not be for them to promote a bypass which could not be justified by or related to the impacts of Sizewell C. What they have not acknowledged is that Sizewell C would be a significant contributing factor in the need for a bypass by adding significant additional traffic to an existing problem.
- 5.9 It is noted that planning applications are not expected to resolve existing problems. However, they must be expected to contribute accordingly if they are adding to existing problems. This is set out in paragraphs 203-206 of the NPPF ‘Planning ‘conditions and obligations’, which refers to the tests of being necessary; directly related; and fairly and reasonably related to the proposed development. It is the view of Little Glemham that the development at Sizewell C will impact on the A12 and represents the tipping point towards a bypass.
- 5.10 Little Glemham therefore strongly disagree with EDF Energy that the Sizewell C traffic will not be of a scale to cause major changes to traffic conditions or justify a major intervention in the form of a bypass. Little Glemham believe there will be

significant traffic impacts as a result of Sizewell C, and that under these circumstances it is not inappropriate to explore the “Four Villages Bypass” in full and proper consideration and consultation.

- 5.11 It is understood that Suffolk County Council agree with this approach that Sizewell C will have some additional impact on the surrounding road networks. Suffolk County Council has now commissioned their earlier reports from 2006 to be updated to take account of the transport information that has only recently been provided by EDF Energy. This is another example of EDF failing to provide the correct information up-front in the first instance, and another reason why progress cannot be made until proper assessments have been undertaken.
- 5.12 It is interesting to note that in paragraph 7.3.9 EDF Energy dismiss the “Four Villages Bypass” and state they will be seeking to “*reduce the impact of Sizewell C related traffic on the A12 and other towns and communities which will be impacted by the project*”. If this is to be understood, then EDF Energy therefore believes there is no impact on Little Glemham, with Farnham being the only village singled out for specific transport improvement. This is simply not true.
- 5.13 Overall, Little Glemham would suggest that a full “Four Villages Bypass” plus 1x park and ride would represent the best and most suitable solution.
- 5.14 A full “Four Villages Bypass”, including environmental impacts, should therefore be explored as part of the Stage 1 options consultations, as well as the Farnham Bypass that is being proposed by EDF Energy.
- 5.15 To dismiss the “Four Villages Bypass” on past environmental grounds without a proper and up-to-date assessment, in the face of the overwhelming support for this necessary improvement, represents a contrived approach by EDF Energy. At the very least it must be considered as an option as part of the Stage 1 consultation.
- 5.16 However, if, as a result of proper consultation on the possibility of a “Four Villages Bypass” option, it was decided that a bypass was not required, then Little Glemham would still expect a series of transport measures to be implemented to alleviate the traffic impacts on the village.
- 5.17 At Little Glemham there needs to be improved footways and cycle-ways. There are currently severe difficulties with linking the village to the nearest town, which is Wickham Market, either on foot or cycle which requires constant crossing of the A12.
- 5.18 From a wider perspective, improvements to the A1094 junction with the A12 would be required. This is currently considered to be a very hazardous junction, due to the nature and speed of the slip road. Proper traffic assessment of how to potentially improve this junction should be considered.

6.0 EDF ENERGY OPTIONS

- 6.1 Little Glemham have the following comments to make on the different options presented in the consultation material that have an impact on the village. These are limited to the Farnham Bend and the southern 'park and ride' options, although some of the options do not represent the best locations or the shortest routes.

Farnham Bend

- 6.2 It is agreed that there needs to be appropriate improvements around the Farnham Bend.
- 6.3 Little Glemham do not support the proposed Farnham Bypass that is being put forward in the in the consultation material. It is located within a flood plain and cuts across a significant piece of local amenity land. It appears unclear if the landscape and environmental implications of this option have been fully considered.
- 6.4 The road widening option relies on the acquisition and demolition of existing buildings, and it is unclear how viable this option actually is.
- 6.5 The traffic control option would only exacerbate the congestion, as EDF Energy rightly point out.
- 6.6 As previously stated, the "Four Villages Bypass" is considered to be the best solution to minimise traffic impacts on this section of the A12, including the Farnham Bend. It should be properly explored for appropriate comparison with the other options.

Southern 'Park and Ride' Options

- 6.7 Option 1 at Wickham Market is acknowledged as representing the best, and EDF Energy's preferred, option. The access to and from the northbound A12 slip road and the general principle of using this site for a 'park and ride' is supported by Little Glemham.
- 6.8 However, this option would require some further re-modelling of the road layout, as there are existing problems where the southbound slip-road joins the A12 dual carriageway. High speeds from the slip road coupled with poor visibility from the A12 have been identified as existing dangers, which would only be intensified by the proposed 'park and ride'.
- 6.9 Option 2 at Woodbridge is also considered to be suitable option that could be supported by Little Glemham. The site and access of the existing roundabout would appear to make a sensible choice.
- 6.10 Option 3 at Potash Corner does not represent the best and most suitable location for a 'park and ride'. Turning right, either into or out of the site, would represent a serious hazard at different times of the day. Therefore, the dangers and potential congestion do not make this an appropriate option.

- 6.11 Overall, EDF Energy need to provide evidence of 'park and ride' schemes relating to major infrastructure projects to enable of better understanding of what can be expected.

7.0 EVIDENCE

- 7.1 These representations have largely concentrated on transport issues, and the likely traffic impacts that will be associated with Sizewell C.
- 7.2 It has been difficult to understand clearly what transport work has been carried out by EDF Energy to-date. However, it has become apparent that there are some significant omissions within the EDF Energy transport related information which needs to be provided before a full and correct assessment of the options set out in the Stage 1 consultation can be properly commented on.
- 7.3 Additional transport related information must include:
- Programme of construction;
 - Numbers of bus movements associated with the 'park and ride' sites;
 - The hours of vehicle movements;
 - Monitoring of workforce vehicles;
 - Assessment of non-Sizewell related vehicle movements;
 - Noise and air quality assessments;
 - "Four Villages Bypass" assessment for comparison with other options;
 - Evidence of how 'park and ride' schemes perform.
- 7.4 This information must be presented in a timely manner, and not late in the day such as the next stage of consultation (Stage 2).

8.0 AMENITIES

- 8.1 As previously set out, Little Glemham is already bisected by the A12. Any increase in traffic is going to have an impact on village and community life.
- 8.2 Any further intensification of traffic on the A12 through Little Glemham will continue to divide the village and community feel, and will make it increasingly difficult for the integration of the village.
- 8.3 There has always been an issue with speeding through the village, which is illustrated by the frequency of the mobile police speed cameras in the area. It is unfortunate, but this is only going to intensify with an increase in traffic. This in turn will lead to more accidents and road traffic incidents.

9.0 CONCLUSIONS

- 9.1 Little Glemham cannot support the proposals for a further nuclear power station at Sizewell until the traffic situation is resolved around Little Glemham and the "Four Villages".

- 9.2 Traffic and its associated impacts therefore main issue for Little Glemham with the Sizewell C proposal, which must be properly addressed before the scheme can progress further.
- 9.3 The increase in workers cars, 'park and ride' buses, construction HGVs, and other associated Sizewell traffic is going to have a significant impact on the A12 and therefore on Little Glemham.
- 9.4 There will be an increase in traffic congestion, noise, vibration, hazards, accidents, and diversions that will impact on the village of Little Glemham.
- 9.5 It is considered that too much evidence and information, particularly transport information, has not been provided to allow a full and proper assessment of the options presented at the Stage 1 consultation. Section 5.7 in the Transport Strategy openly sets out the further transport work is required.
- 9.6 The A12 is vitally important to the region. Therefore, an increase in traffic onto the A12 must be properly modelled. Any impacts on the A12 must be properly acknowledged and understood before any mitigation measures can be agreed upon.
- 9.7 It is positive to see that EDF Energy will continue to "*improve and refine the traffic modelling*", but it difficult to see how decisions can be taken when all of the information has not been presented.
- 9.8 The proposal of Sizewell C and the associated traffic impacts represent a tipping point in relation to a proposed bypass around the villages of Farnham, Marlesford, Stratford St. Andrew, and Little Glemham. At the very least a "Four Villages Bypass" must therefore be properly assessed and considered alongside the other options being proposed.
- 9.9 It is agreed that the Farnham bend needs to be improved, but the options proposed are not supported. This issue could be alleviated through the proposed "Four Villages Bypass".
- 9.10 The 'park and ride' options at Wickham Market and Woodbridge could be supported, provided there was full traffic assessment undertaken on all aspects of the associated road networks.
- 9.11 The additional traffic impacts set out in these representations will increase the physical barrier between the parts of Little Glemham that straddle the A12.