

Little Glemham Parish Council

Response to Stage 2 Pre-Application Consultation for Sizewell 'C' Nuclear Power Station

February 2017



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1. Introduction

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.

Traffic related issues are therefore the main concern for Little Glemham with the Sizewell C proposal.

1.2 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, environmental and educational aspects of the development.

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

2 Sizewell 'C' Proposals Overall

While Little Glemham Parish Council 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 9.4 of this document.

3 Main Development Site – Managing Construction Materials

Little Glemham supports the principal of keeping construction materials on site as described in para 7.5(k) of the consultation document 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. Alternatively freight trains that would otherwise return empty could be used. Road transport should be a last resort and it is noted that the use of road transport for this purpose has not been taken into consideration in traffic assessments.

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

4 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.

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.

5 Transport – Overall Strategy

5.1 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.

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.

5.2 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.

5.3 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.

5.4 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 would 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.

6 Transport – Rail

6.1 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. The five freight trains per day envisaged would not add significant impact to that of the existing rail traffic although it is unclear what the hours of operation would be. The assumption is that the infrastructure would be upgraded to allow the trains to run during the existing operation hours of the line rather than extend hours into the late night or early morning. If heavy freight trains were to run through the night, the noise and vibration would be unacceptable.

6.2 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.

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.

7 Transport – Sea

Little Glemham welcomes the proposal to use sea transport where possible, particularly 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.

8 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 parish of Marlesford. 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 1800 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 be extra traffic during existing busy periods.
- III. Safety issues due to poor visibility for traffic joining the B1078 from the southbound off-slip.
- IV. 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.
- V. 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.

9 Transport – Road Improvements A12

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.

EDF has proposed four mitigation options in Section 11 of the Consultation Document.

9.1 Option 1 Do Nothing (Para 11.5)

Little Glemham Parish Council considers this option to be unacceptable for the following reasons:

- I. There are already problems with congestion at this point and the increase in traffic can only exacerbate this problem, particularly as a substantial proportion of the increase is HGVs and buses (para 11.4.16 and table 11.1 in the consultation document refer);
- II. There is much anecdotal evidence of minor (non-injury) collisions and vehicles striking buildings. While such incidents do not figure in accident statistics, because there is no suitable diversionary route, they have the potential to cause considerable delay and disruption;
- III. Noise, vibration and air quality issues.

9.2 Option 2 Widen Farnham Bend (Para 11.6)

Little Glemham Parish Council considers this option to be unacceptable for the following reasons:

- I. It involves the demolition of a Grade II listed building;
- II. It would remain a sharp bend and would slow traffic with a potential for congestion, minor collisions and air noise and vibration issues.

9.3 Options 3A and 3B One Village By-pass (Para 11.7)

Little Glemham Parish Council considers both these options to be unacceptable for the following reasons:

- I. They pass across amenity land and the Riverside Centre at Stratford St. Andrew. Although not in the parish, these amenities are often used by its residents.
- II. Stratford St. Andrew is not by-passed, giving more potential for congestion;
- III. The junctions with the existing road are likely to cause congestion.

9.4 Option 4 Two Village By-pass (Para 11.8)

Of the four options, Little Glemham Parish Council considers this to be the only one that is acceptable. The positive aspects are:

- I. It provides the best chance of free flowing traffic and thus the least likelihood of noise, vibration and air pollution;
- II. It would not impact on access to and use of the Riverside Centre;
- III. The presence of a roundabout at Parkgate Farm would facilitate access on to the A12 for HGVs and agricultural traffic from villages to the east, eg Blaxhall, rather than via the Church Road junction in the centre of Little Glemham.

Should this option be implemented, 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. 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 (Table 5.5) 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 (Ref. Table 6.7) adding an extra 950 HGVs and buses per day. If we take this to be spread over a working day of two eight hour shifts then this equates to one every 59 seconds. 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.

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. Make Church Road "Access Only" for HGVs in order to direct them via the Parkgate Farm roundabout;
- III. Re-model the Buttons Road and Church Road junctions to allow easier egress by long vehicles;
- IV. Provide financial assistance for the occupiers of properties, abutting the A12, 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.

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.

10 People and the Economy

10.1 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.

10.2 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. There is insufficient information in the consultation document to enable further comment.

We suggestion the following mitigation measure;

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

10.3 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 5.12.5 & 5.12.6) and to bring empty homes back into use.

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.

10.4 Education and Training

We welcome EDF's skills, education and employment strategy as described in Section 5.6 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.

11 Consultation Process

Little Glemham Parish Council is disappointed by the short timescales allowed for the Stage 2 process and the fact that, like Stage 1, it spans the Christmas period.

We are also disappointed by the fact that, in spite of the fact that four years have elapsed between the Stage 1 and 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.

Examples include:

- Traffic management;
- Accommodation;
- Employee conduct.

This makes it difficult to submit an informed response to some of the points raised.

12 Conclusion

The chief concern of Little Glemham Parish Council relates to the impact of construction traffic on the village. We find the proposals on this and other aspects of the consultation inadequate and look forward to their resolution in Stage 3, when it is hoped that more time will be allowed to formulate a response.