



Martlesham Parish Council

Parish Room
Felixstowe Road
Martlesham
Woodbridge
Suffolk IP12 4PB

Clerk: Mrs Susan Robertson
Telephone: 01473 612632
Email: clerk@martleshamcouncil.org.uk
Website: <http://martlesham.onesuffolk.net>

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FREEPOST SZC Consultation

Our ref: 19-084-Sizewell C Stage 3

Dear Sir/Madam

Sizewell C - Stage 3 Consultation

Thank you for the opportunity to comment on the Stage Three proposals. Please find Martlesham Parish Council's comments below adopting the format of your questionnaire:

Background:

"Martlesham and the surrounding parishes have experienced economic and housing growth which places particular pressures on highways and local infrastructure. With its rapidly expanding retail park, commercial sector, Martlesham suffers from issues associated with high volumes of traffic at peak periods."

Martlesham Heath has been identified as a Major Centre in the District Council Draft Local Plan. Martlesham is designated as a large village. Aside from the impact of Sizewell C traffic, the Parish population will double over the next 15-20 years. 2000 houses will be built on the A12 at Brightwell Lakes with a new high-tech business park at Adastral Park on the A12. Traffic is set to reach unprecedented levels with this and the Ipswich Northern Bypass, Ipswich Garden Suburb and development of the A14 corridor.

1. Sizewell C proposals: overall

We feel there is insufficient information to support a new nuclear power station. Therefore, we do not support the proposals for many reasons, including but not limited to:

- Insufficient evidence to consider a cost-v-benefit analysis.
- Insufficient information to assess whether alternative emerging technologies will displace the need for Sizewell C in the timeframe for Sizewell to come on stream.
- There is no reference to the nearby East Anglia One or East Anglia Two windfarm proposals—do they complement the Sizewell Stage Three proposals, or compete with them?
- With progress in cost effective renewable energy storage, and more effective grid balance, we question the economic viability of Sizewell C.
- The proposals are not set out for consultation in the context of the overall energy picture for East Suffolk. Within the local East of England Energy Zone there are opportunities and proposals for the area to produce more renewable energy through low carbon technology, biomass and anaerobic digesters, wind farms, wave power and solar power which are more environmentally friendly than nuclear power.

- The decommissioning proposals for the plant are untried and untested.
- The long-term hazards in handling, transporting and storing nuclear waste are unknown and the plans do not offer adequate health and environmental safety assurance.
- The plans for handling routine medical care for a temporary workforce, emergencies and evacuation are inadequately reported.
- The special qualities of the Suffolk Coasts and Heath Area of Outstanding Natural Beauty (AONB) are being ignored. It is home to a unique mix of habitat and protected wildlife sites.
- The flora, fauna and wildlife, in particular Sizewell Marshes and Minsmere Reserve, will be detrimentally and significantly affected - as recognised by the consultation documents.
- The transport of nuclear waste cannot be secured against terrorism activity and accident, which poses a major threat as it travels through Martlesham.
- The archaeological significance of the surrounding areas affected by the infrastructure planned is underplayed, whilst elsewhere, the national significance of the local Anglo-Saxon history in this part of East Suffolk, is just emerging and yet unprotected.
- Work on understanding the potential effects of a nuclear plant on marine ecology and fisheries is still being considered whereas mitigation measures are only promised "where appropriate". What is appropriate has not been established.

Recommendation:

- The Consultation should repeat the Project objectives – essential for those joining the consultation at a later stage. There is a presumption the objectives are known. We believe the objective is that the plant will produce power for six million homes for 60 years, but it is unclear for whom the energy will be available, and at what cost (economically and environmentally). This is a heavy burden for East Suffolk communities.
- EDF should accept responsibility to coordinate its plans with the East Suffolk energy sector, the Ipswich Garden Suburb and the Northern Ipswich by pass road project.
- EDF should offer some form of measurement and assessment of the benefits in having two new nuclear reactors as against not having them.
- EDF should offer more information on the project costs as a reference point against which to assess the quoted economic benefits to the local East Suffolk economy.
- EDF could offer headline responses received so far from the statutory agencies - The Suffolk Energy Coast Delivery Board, National Power, Public Health England, Natural England, Suffolk NHS, Suffolk County Council and Suffolk Coastal District Council.

2. Main Development Site: Overall

We do not support the main site proposal for the following reasons:

- Sizewell C is the only nuclear site in an AONB in the country and will dissect the AONB threatening the Special Protection Area (SPA) and cause the loss of part of the Site of Special Scientific Interest (SSSI).
- The construction will detrimentally impact on the Suffolk Heritage Coast, cause the permanent loss of some parts of the Suffolk Coasts and Heaths Path, and impact heavily on local inbound tourism.
- The short- term affects and long-term effects of the water-cooling intake are unknown.
- Aldhurst Farm would not replace Fen Meadow and the wet woodland for otters, a Biodiversity Action Plan (BAP) priority habitat.
- The new access road and SSSI crossing would be a wildlife barrier and increase the flood risk.
- The stock piles and borrow pits are due to be huge. Dust could be a health hazard. They would be visually unacceptable so close to the Minsmere Nature Reserve and Leiston Abbey.
- The significant impact on the landscape and the seascape is inappropriate and unacceptable.
- We do not accept the main site is safe from the climate change effects of severe weather and coastal erosion.

- The overhead pylons are to be re-cabled. Underground cabling appears to be rejected by EDF for reasons related to the size of the cables, the heat generated and that EDF would have to utilise more land and build additional underground ducts. No information is given on the alternatives (for example, the East Anglia One underground approach). Sizewell C presents an opportunity to move the existing pylons underground which should not be rejected lightly.
- The Sizewell Marshes SSSI should be kept clear of manmade roads and other infrastructure.
- In the consultation leaflet spent fuel levels are considered. Whatever the level, spent fuel would be less in quantity but more toxic.
- Intermediate level waste is to be kept on site until a national geological disposal facility becomes available. Under the precautionary principle this waste should not be produced until the permanent solution has been constructed.
- The beach landing facility would be in place for the construction period and the operational life of the station, in excess of 60 years.
- Mitigation is in place where appropriate for the 29 viewpoints identified on the main site yet the viewpoints for ancillary sites and tranquillity studies etc. for the main site are not yet complete.

We do support

- The proposed causeway over the culvert at the SSSI crossing to the beach.
- The proposals to reduce the width of the access road once the construction phase concludes.
- The natural landscape margin proposals including additional woodland blocks and hedgerows.
- The condition that the Helipad is for emergency use only. The time taken to access the nearest Accident and Emergency Hospital by road (Ipswich) requires it.
- The landscaping and natural habitat specifications for all phases and the restoration works post construction.

Recommendation:

- The landscaping and natural habitat specifications and restoration works should be the subject of Development Consent Orders and policed for implementation.
- EDF provides written evidence at all stages, that the Duty of Regard under s85 Countryside and Rights of Way Act 2000 has been satisfied.

3. People and the Economy

We do not support the view that significant local, economic and employment opportunities will result from the project over the construction phase of 9-12 years. Our reasons include:

- It is said there will be approximately 5,600 workforce members on site during construction with a legacy of 900 jobs. The long- term employment opportunities, we believe, will largely be specialist engineering roles specific to the nuclear industry and sourced from abroad, not sourced from local expertise.
- The attractiveness of the area will be greatly reduced thereby adversely impacting on the local tourism and leisure sector. The Suffolk Coastal Final Draft Local Plan (Local Plan) recognises the AONB as vitally important to the local tourism industry contributing 12% to the total local employment.ⁱⁱ
- The Local Plan identifies the Suffolk Coastal region as home to a variety of small to medium businesses in the manufacturing, industrial, tourism and creative industriesⁱⁱⁱ. These small to medium enterprises (SMEs) may be unable to compete with large scale corporate companies.
- The lack of information on the corporate and investment structures in place for Sizewell C leads us to question how any insolvency and corporate restructuring exposes the local economy to risk and potentially renders insecure any long-term waste management plan.

- The influx of workers may exacerbate the demand for local housing and artificially distort local housing values and rental income. This will in turn impact on the East Suffolk Business Plan, East Suffolk Tourism Strategy and East Suffolk Economic Growth Plan 2018 all of which strive to build up the 'Hospitality and Leisure' sector of the local economy, increase the total tourism value to the local economy and increase visitor numbers to the area.

We do support

- EDF's emphasis on training
- EDF's aspirations to recruit locally

Recommendation:

- A strategy to "lock in" recruitment from the local area including Martlesham and Martlesham Heath.
- EDF to offer low cost training opportunities affordable and attractive to local SMEs

4. Accommodation: Overall Strategy

Our views on onsite accommodation are mixed: we recognise the campus will offer local employment opportunities but will compete with local businesses for rental income.

We do support the concept of building an onsite campus to reduce workforce journeys (as stated in the consultation papers) but not the contention the onsite campus will strike a balance of onsite and offsite accommodation (as set out in the question 4 information) as the figures do not add up.

The Local Plan identifies 4000 rooms providing 7500 bed spaces for tourism accommodation^{iv}. The Sizewell consultation, as we understand it, models at its peak, 2,366 home based workers. Of the 3,600 non home based workers, 78% (2,800) will be accommodated on site leaving a capacity of only 800 bed spaces to be found in local accommodation.

We do not support:

- The assertion that on-site accommodation for 78% and 22% off-site accommodation strikes a balance between minimising community impact and maximising local opportunity.
- Accommodation within the SSSI.
- Accommodation within the wider AONB setting.
- Accommodation within a SPA setting.
- The contention that providing on-site accommodation and associated sports and canteen facilities, minimises the impact on the local community. Instead it potentially minimises the economic advantages and opportunities to be gained by local business.
- Four storeys.

We do support:

- The concept of building an onsite campus to reduce workforce journeys.
- Maximising the economic opportunities for local business.
- EDF documenting its Duty of Regard under s85 Countryside and Rights of Way Act 2000 in relation to its exercising and performing any accommodation function.
- Controlling and logging worker vehicles through an Agency bureau to counteract inconsiderate parking and speeding through Martlesham and Martlesham Heath.
- A permanent legacy of sports facilities for the local area, however, we believe one football pitch and 2 Multi Use Games Arenas is not enough of a legacy.
- A Housing Fund.
- The new planting proposals for Eastbridge Road.

Recommendation:

- Increase the sports legacy
- Decrease building height to three storeys or less
- Provide information on the proposed Housing Fund
- Perimeter fencing should be nature friendly. i.e. hedges not fencing
- The provision of permanent 'affordable' housing rather than temporary in order to reduce the pressure elsewhere, particularly in Martlesham. The extra housing in Martlesham may well attract extra traffic between Martlesham and Sizewell for the workforce.

5. Accommodation: temporary campus and caravan site

We do not support:

- The caravan strategy as it is self-catering, invites home deliveries (which exacerbates unregulated local traffic) and heightens security risks.
- An accommodation campus of up to 2,400 bed spaces in a Special Protection Area (SPA) because it would cause disturbance, lighting, shift working and pressure on local services as well as loss of tourist accommodation. House price instability is also likely.
- Unlicensed caravan sites.

Recommendation:

- Council Tax is chargeable on caravan accommodation to facilitate the cost of increased use of local services.
- The electronic vehicle recognition extends to home delivery services on site.
- EDF to pay for emergency, waste and medical services for onsite personnel to alleviate the pressure on local public services.
- EDF to contribute to flood defences for the caravan site.

6. Transport: Movement of Materials

If the project is to proceed, we support the rail led strategy over the road led strategy, but favour a sea -led strategy. We say this because A12 Traffic is a major concern for Martlesham:

- a. Brightwell Lakes^v and its 2000 houses will significantly add to the traffic flow along the A12
- b. The Brightwell Lakes plans envisage a new entrance and traffic lights interrupting the A12 traffic flow^{vi}
- c. The Martlesham Retail and Business area has more than doubled in size since 2013 and this is set to continue, with traffic often grid locked in peak times failing to feed effectively on to the A12.
- d. The Local Plan identifies a further 600 homes immediately adjacent and feeding into the A12 Martlesham Heath area. This includes 300 at the Suffolk Police Headquarters roundabout^{vii} , 150 at Humber Doucy Lane^{viii} , and 120 at the Woodbridge Town Football Club/Seckford roundabout site^{ix} excluding the neighbouring parishes of Kesgrave Rushmere and the Orwell Green proposals. The impact of the Ipswich Garden Suburb, a significant urban extension to Ipswich providing up to 3,500 new homes, should also be taken into account.
- e. When the Orwell Bridge is closed due to high winds, the local traffic impact is felt as far along the A14 and A12 as Martlesham Heath.

We do not support:

- The removal of the sea led strategy from the consultation.
- Such a heavily phrased consultation on the rail led strategy when Network Rail has not confirmed the proposals are viable.
- Increased HGV and LGV traffic volumes and associated noise along the A12 - residential areas of Martlesham Heath backing on to the A12 will be detrimentally affected.
- The electronic tracking system being limited to HGV movement only - how will EDF Energy regulate long goods vehicles, cars, vans and small lorry users passing through Martlesham and Martlesham Heath?
- EDF's modelling of traffic movement and traffic impact. We feel that the increase of traffic, particularly HGV and LGV traffic on the A12, will have a detrimental effect on local air quality. EDF Energy has recognised that it must conduct further assessment work on air quality, but little is made of this in the consultation.

Recommendation:

- Support to manage parking in the lay-bys off the A12, to close the lay-by behind Lancaster Drive in Martlesham Heath where residents are disturbed by overnight parking and anti-social behaviour.
- Factor in Brightwell Lakes traffic and other housing impact on the A12 traffic flow modelling.

9/10. Transport: Level Crossings

It is unclear what is being asked at consultation questions 9 & 10.

We do not support closure of the footpath level crossing in Martlesham as this could reduce options/convenience for local walkers.

We support:

- The riverside footpath from Post Office Lane Martlesham to a route under the railway bridge. It is often subject to flooding. Part of this route has been 'claimed' by dog walkers and is well used.
- All footpaths, bridleways and cycle routes to be kept as safe and convenient as they are now both during and post construction.

Recommendation for a rail led strategy:

- More information being made available regarding night timetables.
- Distinction between transporting materials to site and passenger transport.
- Extending the rail passenger services to Sizewell for the public to travel to the site by rail.
- Addresses the bigger issues of the A12 traffic at Martlesham and Martlesham Heath.

11. Transport: road led strategy, freight management facility

If a road led strategy is adopted, we support a lorry park to control traffic through Martlesham. Both options would increase traffic flows at the Seven Hills roundabout, but the Innocence Farm option would also involve crossing a fast section of the A14.

Recommendation

- Traffic lights control the A12/A14 interchange roundabout
- The Sizewell C construction takes place before or after the Northern Ipswich Relief Road, not at the same time – both long term projects will have considerable impact on Martlesham.

12. Transport: Southern Park and Ride Wickham Market

We note in relation to the Southern Park and Ride at Wickham Market:

- No mention is made of any archaeological importance to the site and surrounding area.
- The increase in traffic modelling from 1000 car spaces to 1250 spaces.
- There is little or no information on wider use public transport options, car sharing schemes, segway schemes for consultation and feedback.
- There is little or no information how this alleviates the challenges further up the A12 to Martlesham with identified traffic flows.
- The consultation questions do not address the bigger issues of the A12 traffic at Martlesham and Martlesham Heath.

Recommendation:

- Perimeter fencing should be nature friendly. i.e. hedges not fencing.
- The boundaries should have wildlife friendly corridors.
- Workers from Sizewell B should be encouraged to use the park and ride, not limited to the construction workers for Sizewell C.

13. Transport: A12 two village by pass

The consultation questions do not address the bigger issues of the A12 traffic at Martlesham and Martlesham Heath.

Recommendation:

- The traffic impact on Martlesham Parish in conjunction with Brightwell Lakes should be considered.

14. Transport: Road Improvements

- The consultation questions do not address the bigger issues of the A12 traffic at Martlesham and Martlesham Heath.

Recommendation:

- The traffic impact on Martlesham Parish in conjunction with Brightwell Lakes should be considered.

15. The Consultation Process

Our comments are:

- The Stage Three Consultation should repeat the Project objectives – essential for those joining the consultation at a later stage. There is a presumption the objectives are known.
- It should address the issues of the A12 traffic flow at Martlesham and Martlesham Heath.
- EDF should please address the question whether emerging technologies will displace the need for Sizewell C's capacity in the timeframe for Sizewell to come on stream, especially if the money going into Sizewell C could be diverted into accelerating the development and building of alternative sources.
- Reference has been made within the consultation to the output from the power station being consistent with that of offshore wind. What does that mean? What is its significance?
- The consultation should tie up and coordinate how the Sizewell plans fit in with the many and varied projects happening locally in this region of East Suffolk – not in isolation.

- Much more reassurance and clear information about operational safety should be provided.
- Provision of emergency and evacuation plans are required for consultation.
- Habitat Regulation Assessment headlines should be included for feedback and comment.
- Shoreline Management Plan headlines should be included for feedback and comment.
- More information is required on the health risks from nuclear plant. For example, the findings on Leukaemia research by the KiKK report have since been updated. What is the current medical opinion on threats to health arising from nuclear power to those living within a 5km radius of a nuclear power plant, and those outside of the 5km zone such as the Martlesham Parish residents?
- Explain why the marine-led option was rejected.

Thank you for taking these comments into consideration.

Please do not hesitate to contact us should you require clarification on any matter raised in this letter.

Yours faithfully

S.C. Robertson

Susan Robertson
Clerk to Martlesham Parish Council

Cc Martlesham County & District Councillors, MPs Coffey & Poulter, Suffolk Preservation Society

ⁱ Page 77 Suffolk Coastal Final Draft Local Plan January 2019 para 4.66

ⁱⁱ Page 109 Suffolk Coastal Final Draft Local Plan January 2019 para 6.4

ⁱⁱⁱ Page 23 Suffolk Coastal Final Draft Local Plan January 2019 para 3.2

^{iv} Page 118 Suffolk Coastal Final Draft Local Plan January 2019 para 6.34

^v Page 242 Suffolk Coastal Final Draft Local Plan January 2019 SCLP Policy 12.19

^{vi} <https://www.brightwell-lakes.co.uk/downloads/brightwell-lakes-masterplan.pdf>

^{vii} Page 258 Suffolk Coastal Final Draft Local Plan January 2019 SCLP Policy 12.25

^{viii} Page 254 Suffolk Coastal Final Draft Local Plan January 2019 SCLP Policy 12.24

^{ix} Page 292 Suffolk Coastal Final Draft Local Plan January 2019 SCLP Policy 12.33