



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>

25 September 2019

FREEPOST SZC Consultation

Our ref: 19-268-Sizewell C Stage 4

Dear Sir/Madam

Sizewell C - Stage 4 Consultation

Thank you for the opportunity to comment on the Stage 4 proposals.

Martlesham Parish Council responded to the Stage 3 consultation and those comments still stand. We continue to ascertain that there is insufficient information to support a new nuclear power station.

1. Background:

Martlesham and the surrounding area continues to experience unprecedented traffic growth and housing growth all of which is outlined in the East Suffolk Local Plan currently under examination with the Planning Inspector.

It remains the case that enormous pressure continues on Martlesham A12 traffic including:

- The Ipswich Northern Route – one of the three route options exits on to the A12 at Martlesham. The road will facilitate increased local traffic, accommodate Ipswich traffic and displaced A14 traffic from any closures of the A14 (Orwell Bridge). Believed to be the currently preferred route by Suffolk County Council, the Ipswich Northern route will necessitate a major reconfiguration of the current Martlesham Park and Ride roundabout on A12 at an already significant intersection of local routes crossing the A12.
- The Brightwell Lakes development – 2000 new homes and associated vehicular movement will require a new road junction on the A12, interrupting the current traffic flow from the A14 along the A12 towards Sizewell.
- Recent Suffolk County Council proposals to slow down the traffic flow along the A12 with variable speed restrictions have been sent back for review; a holistic approach needs to be taken bearing in mind the impact on all road users and local residents.
- The proposed 300 new houses at the Police Constabulary site on the A12 at Martlesham.
- The proposed 120 new homes at the Woodbridge Town Football Club site on the A12 at the Woodbridge roundabout (within the Martlesham Parish boundary) further slowing down traffic flow.
- Current Martlesham Retail Park traffic and BT traffic is often grid locked in peak times failing to feed effectively on to the A12.

2. Climate Change

2.1 Carbon Emissions

Government, at National, County Council and Town & Parish Council level, has declared a climate emergency since the Stage 3 consultations. The Stage 4 modifications appear not to take account of this.

In the Stage 3 consultation EDF emphasised nuclear power as a low carbon source of electric power. This overlooks nuclear power as a high carbon user considering construction, freight and passenger transport, mining and controlling waste output. Low carbon strategies must be incorporated in the planning process, employed in practice, and EDF held accountable for failure to adhere to those policies.

It is incumbent upon Martlesham Parish Council to seek carbon emission reduction strategies throughout the lifetime of the Sizewell development, to draw attention to the high carbon emissions attributable to the project, and to require EDF to pursue low carbon strategies.

2.2 Environmental and emergency planning

We do not support a road led strategy as per the Stage 4 modifications or otherwise.

The Stage 3 consultation sought feedback on EDF opting for either a road led option or rail led option. The Stage 4 consultation does not provide a clear solution, now retaining both options. Uncertainty at this late stage on such a vital aspect of environmental planning is a major concern.

“Building Sizewell C would involve the daily movement of large numbers of construction workers and significant amounts of materials and equipment. Our proposals include mitigation measures to limit potential effects on local communities and the environment. Stage 4 continues with a road-led or rail-led approach to moving freight, along with a new, additional, integrated strategy (see Chapter 3, Stage 4 Consultation Document)”

It appears to us the road led strategy is favoured rather than lower carbon use marine and rail strategies. The Stage 3 consultation feedback asked for an explanation as to why the marine led strategy, or integrated rail and marine led strategy, has been dropped. No explanation is given in the Stage 4 consultation.

We note and support the proposals for further consultation on emergency planning.

2.3 Sector wide energy plan

It appears the Stage 4 consultation ignores the Stage 3 feedback request for a sector wide energy plan – the Sizewell C project is seemingly planned in isolation from other major infrastructure proposals affecting this region.

We hold EDF accountable to the assurances it gives in the Stage 4 consultation regarding project sustainability and the decommissioning of the site.

“Additional information and next steps

- *UK EPRTM technology. The UK EPRTM marks significant progress towards sustainability. It has been designed to use less uranium and produce almost a third less long-lived radioactive waste compared with water reactors in operation today. The spent fuel and intermediate level radioactive waste would be kept on-site until a national geological disposal facility becomes available. Low-level waste would be treated on-site to limit its volume and, after appropriate conditioning and packaging, it would be removed for disposal. The UK EPRTM meets the most stringent safety standards, having gone through the UK’s rigorous, four-year ONR Generic Design Assessment (GDA) process. For more information on GDA see: www.onr.org.uk/new-reactors.*
- *At the end of its electricity generation lifetime, Sizewell C would be decommissioned in a process likely to take about 20 years and requiring consent from the Office for Nuclear Regulation (ONR) before it can take place. However, the interim spent fuel store would continue to operate until a national geological disposal facility is available and the spent fuel is ready for disposal. “*

2.4 Recommendation:

- Greater regard should be given to the Government declaring a climate emergency and an explanation whether this impacts on the Sizewell C project
- Before proceeding further, review the other options more than focusing on road-led strategies
- Advise what is happening in relation to the planning of the national disposal facility
- Consult as part of a sector wide regional energy strategy
- Widely advertise the further emergency planning proposals and invite Parish and Town Councils to actively engage in those plans

3. Transport:

3.1 Movement of Materials

If the project is to proceed, we support the rail led strategy over the road led strategy, however, we favour a sea -led strategy.

A rail led strategy would affect fewer residents and decrease the anticipated 1500 daily additional traffic movements for Martlesham. Increased rail usage daytime would decrease the need for overnight rail movements.

We note that mitigation is offered in the Stage 4 proposals to local communities, but little and inadequate detail is provided as to how mitigation and compensation packages will be delivered. Martlesham will be affected by the Sizewell Project as much as the more closely located communities.

We do support:

- A cross - party approach to comprehensively plan for traffic movement within and around Martlesham, considering all strategic developments set to affect Martlesham
- A wider traffic strategy to facilitate low carbon emission policies
- Greater use of public transport provision in the short and long term
- Extending the passenger services to Sizewell for workers and visitors to travel to site by rail
- Increasing the local legacy of rail provision across the region

We do not support:

- The removal of the sea led strategy from the consultation

Recommendation:

- Greater effort should be put into a rail and marine led integrated strategy
- Greater effort should be put into planning for road traffic strategies for the A12 traffic as a whole, not in isolation to the Sizewell C project
- Consult with Martlesham Parish Council in relation to traffic issues along the A12 at Martlesham
- Consult with Martlesham Parish Council on the detail of any mitigation to be offered to local communities
- Plan for infrastructure maintenance on all roads impacted by the Sizewell Project
- Employ an electric vehicle strategy
- Upgrade road surfaces with quietening materials in anticipation of Sizewell construction

3.2 Laybys

Stage 4 disregards the Stage 3 feedback provided by Martlesham Parish Council concerning vehicles parking in laybys in Martlesham and particularly the lay by opposite the BT Tower; it has been used as an overnight stay for many lorry drivers which cause issues for local residents. This should have been closed but no action has been taken. The Stage 4 modifications will impact even more on this layby being used.

Recommendation

- Consult with Martlesham Parish Council in relation to use of laybys along the A12 at Martlesham

3.3 Level Crossings

We would be satisfied with the closure of the section of Footpath 9 where it goes over the railway line if the path at this point is diverted as a riverside route under the railway bridge.

3.4 Road led strategy

Any modifications to the Local Plan (following examination on proposed developments at the Police Headquarters at Martlesham, Innocence Farm in Felixstowe and Orwell Green on the A12/A14 intersection) should be factored into the final planning.

Martlesham Parish Council encourages sustainable transport. The Parish actively encourages policies to reduce the effects of non-sustainable forms of transport. We would support a rail led strategy which delivers sustainable transport even if it takes longer to deliver.

The Parish has an extensive cycle path network to endorse sustainable road use by cyclists, pedestrians, mobility scooter users, and encourages walking as a form of transport. Martlesham Common, the green corridors and footpaths across the open spaces used to connect the residential, retail and commercial areas of Martlesham should not be put at risk as a result of roads becoming so heavily congested with heavy goods vehicles that pedestrians and cyclists do not want to cross the roads or use the footpaths.

Recommendation

- Traffic lights control the A12/A14 interchange roundabout
- If it goes ahead, the Sizewell construction should take place before or after the Ipswich Northern Route, not at the same time – both long term projects with considerable impact on Martlesham
- Consult with Martlesham Parish Council in relation to traffic impact on pedestrians and cyclists, and the local green environment

3.5 Rail led strategy

We support any new rail infrastructure as a lasting legacy to the region. An upgrade to 5 freight trains in 24 hours is broadly welcome but does not go far enough. However, disturbance to residents at night should be avoided as far as possible.

We attach, as an appendix, a report by our representatives at Joint Local Authority Group (JLAG) events.

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

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