

Middleton-cum-Fordley Parish Council

Response to EDF Sizewell C Stage 4

Pre-Application Consultation

27th September 2019



The village of Middleton-cum-Fordley lies between the B1122, which crosses Middleton Moor on its way from Yoxford to Leiston, and the B1125, which connects Blythburgh with the B1122. Each of these roads is expected to be subject to profound additional traffic during the construction of the proposed new twin nuclear power station at Sizewell (SZC). As such, its residents will be heavily affected, many of whom live within a few metres of the edge of these roads, while others will be subject to delays and frustration trying to join these roads when exiting the village.

Middleton PC has thus robustly responded to each of the previous three Stages, lamenting the dire lack of information provided on a range of extremely important issues, effectively preventing meaningful conclusions from being reached. In addition to our conviction that the two aforementioned roads do not have the capability of absorbing the envisaged traffic levels, their use will cause intolerable delays, disruption, greater risk of accidents and health issues from pollution upon the residents living on those routes. We also have considerable concern regarding other matters:

1. The destruction of natural habitat and effects on wildlife at Minsmere and areas designated AONB and SSSI;
2. The disfiguring of the area's beauty and tranquillity;
3. The effects upon the local tourist economy;
4. The disruption caused to, and by, the inevitable clash of agricultural vehicles with construction traffic;
5. The additional pressure likely to be imposed on health services, schools, policing and social services;
6. The inadequate explanations concerning plans for monitoring water table levels and sea defences.

It was expected, therefore, that Stage 4 would address at least some of these issues. In fact it does nothing to allay the concerns we have set out above and in our previous responses. It merely tinkers with the Stage 3 proposals.

We reiterate that the lack of information provided by EDF has made a nonsense of every stage of the consultation process. Their timings have been ill-judged, aligned with periods when respondents are on holiday or heavily engaged in other matters, while the questions they have asked have been misleading, irrelevant or slanted to provide EDF with an easy option.

Challenged about the absence of data, Jim Crawford, in a recent BBC Look East TV interview, stated that information gleaned from their various studies was being shared, and that they were not being disingenuous. They most decidedly are – the comments coming from the surrounding parishes, Suffolk County Council, East Suffolk Council, RSPB, Minsmere Levels Stakeholders Group, local Action Groups and the Environment Authority, as well as the rebuff by his staff of his own promise to make a report on the access road options available, all say otherwise.

We are not convinced that the benefits of proceeding with SZC will outweigh the disbenefits, a view shared with all of the above bodies. We therefore still draw the same conclusion as that expressed in our Stage 3 response, viz:

1. We do not accept that there is a need for a new nuclear power station in the Suffolk AONB.
2. The negative impacts of the proposed development of SZC are so severe that adequate mitigation is not possible.
3. There is doubt that a twin reactor station can be successfully accommodated within the allocated 32-hectare site.

Stage 4 offers nothing in the way of new information on the vital topics mentioned above, but merely proposes a dubious 'integrated' transport strategy (one extra train), the choice of 4 unsightly pylons or 5 slightly less so (our first choice would be to bury the cables, as originally envisaged), and the amazing concept of tearing up any new access road, if one is built to serve the site, after construction is complete.

That this suggestion is made, which would only add to the expenses of the project, cause even more disruption to local life and frankly be impossible to avoid leaving very visible traces afterwards, beggars belief.

Middleton's Stage 3 Response therefore remains relevant and unaffected by anything that has arisen from this latest consultation, and serves to augment the specific comments that follow. It is appended to this Response for ease of reference.

Transport Strategies

While the maximum use of rail is to be welcomed, we are concerned at some of the ramifications that could arise, as outlined by EDF within Stages 3 and 4.

The intimated closure or revision of several foot or road level crossings would create considerable hardship for some residents. But are these alterations really necessary? Network Rail would dearly like to act on this, as level crossings are a recurring national safety issue, but with only 5 trains per day as the maximum, travelling at 20mph, there are surely ways of ensuring safety by other effective means.

The new link road would not be built under a rail-led plan, imposing traffic levels on the B1122 even higher than those envisaged at Stage 1, which were seen even then as beyond the road's capability and a totally unacceptable imposition on residents along the route. It is therefore fundamental that a new access road is built, regardless of whichever transport strategy is adopted.

On the subject of a new access road, the route should be the original D2 (or the similar W) and not the 'Link Road' first raised in Stage 3 and perpetuated in Stage 4.

Concern was raised in our Stage 3 Response regarding the methodology being used by EDF for traffic modelling. From the scant information revealed during discussions with EDF Transport personnel at their recent presentations, we believe that their modelling has provided for regularly spaced traffic, allowing them to declare that the roads have sufficient capacity. Local knowledge and observation of even present day volumes shows this not to be the case. The traffic tends to bunch up into strings of vehicles, sometimes quite long. With the additional numbers projected during construction, this will lead to huge tailbacks and long delays at Martlesham, and potential gridlock at Yoxford.

That their traffic modelling is suspect is borne out by experiences to date at Hinkley. The entire area around Bridgewater has been subject to frequent day-long traffic jams, causing delays sometimes of more than an hour duration. A spokesperson for EDF stated that this had been due to road repairs and water supply fractures, beyond their control. That may be so, but with the huge increase in traffic, much of it heavy, to which these roads are being subjected, failures are to be expected and should have been built into EDF's modelling. This was clearly not done.

Other Concerns

It is now open to serious question as to whether or not the Sizewell site is a suitable location or an adequate size for a twin station. From the Government's NPS paper EN-6, Sizewell was merely listed as a 'potential' site, though its location on a fast-eroding coast and among such fragile surroundings, along with its many detrimental impacts on local life, now call this into doubt.

From that same paper, it is stated that a single nuclear station site will generally require 30 hectares. As a guide, the Hinkley twin station will occupy 45 hectares on completion. Yet SZC is expected to be wedged into just 32 hectares. It makes no sense just reading it, and a recent event illustrates it cannot be done in practice. The locally cherished Coronation Wood, and part of a nearby public amenity area called Pill Box Field, are due to be destroyed ahead of EDF even submitting the application for development consent, let alone approval being given, to make more room available. There is the strongest suspicion that there may be more examples of underhand land-grabbing like this.

Appendix

Response to EDF Sizewell C Stage 3 Pre-Application Consultation

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1. Introduction

This paper sets out the views of Middleton cum Fordley Parish Council and, as far as we are aware are shared by the vast majority of our residents. Nevertheless, we are aware of a few people within the village who support EDF's proposals.

2. Middleton cum Fordley Parish

Middleton cum Fordley (known locally simply as Middleton) lies three miles north west of the site of Sizewell C (SZC) and has the B1122 running through it en route from Yoxford to Leiston. The B1125 runs from Blythburgh through the east of the village to join the B1122 to the south.

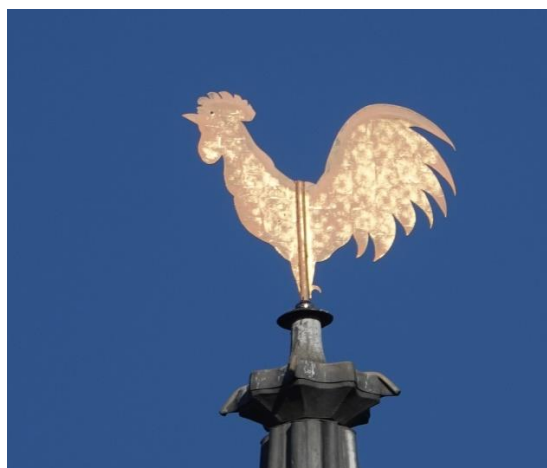
Middleton lies in the highly acclaimed Suffolk Heritage Coastal area. The parish comprises three distinct areas, the main village straddling the 5-metre contour near the Minsmere river and marshes; Middleton Moor on higher ground to the north-west and Fordley, further west again.



The village is over a thousand years old. The soil varies from sands, river valley silts, through to heavy clay. It is surprisingly hilly with extensive views. There is a wide range of historical buildings with good examples of thatch, flint and timber frames.

The Moor comprises seven and a half acres of common land. Records go back 700 years. Heavily grazed in the past, it is now subject to regular mowing and conservation measures including wild flower planting and a new hedge at the eastern corner. The Moor has several wildlife-rich ponds, one of which was used for full-immersion baptisms in Victorian times.

Our population numbers around 350 people. The 2011 census showed exactly 50% were over 60 and 136 out of 291 residents over 16 were in employment. So, while many of our residents are working, necessitating travel to and from their places of work, many are retired, though still active – the village won the Suffolk Most Active Small Village award in 2015. Apart from boules, cricket, croquet and other sports, many relish country and coastal walks, enjoying the diverse habitats and wide range of abundant flora and fauna that the area offers.



The village has a pub (the Bell), a primary school, a church (Holy Trinity) a recreation ground, a farmshop and a Village Hall. For many it is the epitome of the idyllic English Village.

3. Overview

The Parish Council is opposed to the proposed construction of Sizewell C. We have reached this conclusion on three principal bases.

1. We do not accept that there is a need for a new nuclear power station in the Suffolk AONB.
2. The negative impacts of the proposed development of SZC are so severe that adequate mitigation is not possible.
3. There is growing doubt that a twin reactor station can be successfully accommodated within the allocated 32-hectare site. For comparison, the supposed 'sister' twin reactor site at Hinkley Point will occupy 45 hectares. From NPS EN-6, a single station is generally expected to require 30 hectares, roughly the size of Sizewell B. We note that a part of B's infrastructure will have to be relocated to the adjacent Coronation Wood, to its severe detriment, to make way for C. We are concerned that, as the scheme develops, even more land will be taken from the surrounding AONB and SSSI.

We acknowledge that EDF has stated that the principle of the need for new nuclear power stations and the choice of Sizewell as a potentially suitable site are outside the scope of this consultation. However, we consider that our response would not be complete without some reference to these issues, not least because if it is accepted that large scale nuclear power stations are less essential (which we believe it will be when national energy policy is reviewed at some point in the future) then the case for acceptance of unmitigated negative impacts becomes less persuasive.

Moreover, whilst, as EDF says, the site is potentially suitable, this does not mean it is unequivocally suitable and not open to challenge.

Should the scheme go ahead we have grave reservations about the construction process, its impact on the local community and environment and the mitigation measures currently proposed. While EDF makes out it is doing as much as it can to mitigate the impact of the scheme many of our residents consider that it is not. In fact, it has put forward the absolute minimum it thinks it can get away with. If there are any benefits to this scheme, they are national or regional. All the disbenefits fall on the local community.

Specifically, we have concerns about the following issues:

	Paragraph no.	EN1*	EN6*
The impact of the main site development on the wildlife and amenity value of Minsmere nature reserve and the Sizewell Marshes SSSI	5.2, 5.3	5.3	3.9, 3.12
The impact on the landscape of the AONB	5.4	5.9	3.10
Inadequate assurances on mitigation of light pollution	5.5	5.6	3.10

Local employment opportunities over-stated	5.1	5.12	
Impact on tourism	5.2	5.12	
Community impacts – security and crime	5.3	5.12	3.12
Rejection of marine -led strategy	6.2	5.5	3.8
Inadequacy of rail-led strategy	6.3	5.13	3.15
Objection to proposed relief road route	6.4	5.13	3.15
Request for more transparency in traffic modelling	6.5	5.13	
Criticisms of the consultation process	7		

**EN1 and EN6 are policies used by the National Planning Inspectorate to assess projects such as SZC*

4. The need for Sizewell C

4.1 The changing energy market

We are not anti-nuclear, but we object to the construction of any further pressurised water reactors (PWRs). Since government policy came into force in 2013, energy technology has moved on. Government policy should have changed – but it has not, as government has been so distracted by Brexit. The price of renewable energy has come down from £155 per MWH to £55 per MWH - 60% of that proposed for SZC. Grid-level storage has become a reality. And smaller nuclear plants look much more attractive than the 30-year-old technology to be employed at Sizewell.

EDF makes much of nuclear energy being carbon free, but fails to tell us how much embedded carbon is involved in the construction of the two power stations and what the carbon payback period is. We need this information – SZC might not be anywhere near as sustainable as EDF would have us believe.

4.2 Why Sizewell?

If government decides that it does need PWRs – they should be somewhere else. Coming to the problem afresh, no-one in their right mind would consider such a location in an AONB, abutting the fragile ecosystem of Minsmere, one of the UK's premier nature reserves, on a stretch of coast particularly prone to severe erosion. The reactors are only being put at Sizewell because government thinks we are inured to large-scale nuclear development. We are not. We have done our bit already with two nuclear power stations and a nuclear waste dump (cynically labelled a dry fuel store).

5. The main development site

5.1 Overview

The construction site development will include the development site itself, a huge fabrication area, massive quarries, car parks for at least 2,500 cars, rail and road freight yards, accommodation for 2,400 workers and 35m high spoil heaps. Yet EDF expects us to believe that this massive development of 1.6 square miles, employing 5,600 plus workers right up against the southern boundary of the reserve will do no harm to the AONB, its ecology and its landscape. We remain to be convinced, to say the least.

5.2 Minsmere

More than 5,000 species have been recorded at Minsmere making it one of the most important nature reserves in Europe. Most of the reserve is low lying marsh served by a complex hydrological system. Water levels, contamination levels and salinity need to be carefully monitored and controlled. Many of the birds are averse to human contact and easily frightened off¹.



View north from North Wall



Existing A and B stations



View south from Coastguards Cottages

Many of our local residents visit the RSPB Minsmere reserve on a regular basis and value it for its landscape and wildlife. It is also important as a destination for more than 100,000 visitors² every year from around the UK and abroad, including some who add appreciably to the local economy by staying in holiday accommodation in the area. We are therefore very concerned at the impact of the development on the reserve including visual intrusion, loss of habitat, the impact of noise and artificial light, possible effects on the RSPB's ability to manage water levels and potential erosion of Minsmere's coastline.

For these and other reasons we are strongly opposed to the proposed siting of Sizewell C. If it does go ahead, we join with the RSPB in calling for EDF to state publicly that the reserve will be protected from any potential harm from the development and for it to fully assess the impact Sizewell C could have on Minsmere's habitats and wildlife and publish a clear plan outlining how it will address any potential impacts.

¹ EDF's evidence that mitigation measures will be sufficient enough to ensure harriers are not disturbed is thin to say the least – and relies on a single piece of research based in and around Felixtowe Docks. The ornithologists in our community will attest that harriers are rarely seen over urban areas – let alone areas of heavy industry.)

²Source: RSPB press release 7/1/2019

5.3 Sizewell Marshes SSSI

The main development site and the extensive areas to the north and west required by EDF for construction and access include varied landscapes to which there is extensive public access by way of rights of way and permissive paths including the regionally important Suffolk Coastal and Sandlings long distance paths. The Sizewell marshes SSSI is central to this wider landscape and we object to the taking of 6 ha of land from this precious and beautiful landscape.

This landscape is important for its habitats and wildlife, as acknowledged by EDF, and is valued by our residents for these reasons and for its contribution to well-being. Many of us will be stressed and saddened by the industrial-scale intrusion on this area and worried that the promises of habitat replacement and post-construction restoration will not be kept. Just one example of the risks that would concern us is the potential loss of Marsh Harrier foraging habitat. As EDF states, *'noise levels across the main development site would be greater than 80dB L_{Amax} and this could potentially act as a barrier to the movement of marsh harriers south into Sizewell Marshes SSSI (along with visual disturbance from construction infrastructure) from breeding sites within the Minsmere to Walberswick SPA and Ramsar Site to the north. Suitable foraging habitat within Sizewell Marshes SSSI could therefore be effectively lost as a foraging resource to marsh harriers. In addition, arable land on the western side of the main development site lies within the >70dB L_{Amax} footprint and could also be lost to foraging marsh harriers. This loss of foraging habitat could potentially reduce the breeding success of marsh harriers within the Minsmere to Walberswick SPA and Ramsar Site.'*

We would like further evidence that this (any many other impacts acknowledged by EDF) can be convincingly mitigated.



Part of the Sizewell Marshes SSSI - 2March 2019

In the long run EDF promise that the measures within the Landscape and Ecology Management Plan (LEMP) *'would convert existing intensively farmed arable habitat within the EDF Energy Estate to acid grassland and heath characteristic of the Suffolk Sandlings. This landscape-scale approach would reduce existing fragmentation effects whilst providing additional habitats that would further enhance the populations of protected species present within the EDF Energy Estate. Overall net gains in biodiversity are anticipated as a result of this approach with an overall significant beneficial effect.'*

We share this vision of an enhanced landscape-scale conservation and amenity area, as for example, actively championed by Suffolk Wildlife Trust in its ambitious Carlton Marshes project in the north of the County.

If there was a convincing case that without Sizewell C power station there would be a serious threat to the security of the nation's electricity supply or that any other solutions would be materially more expensive or risky than it might be rational to accept that the development is a necessary price to pay for the eventual 'overall significant beneficial effect'. Given that, as set out above, we believe this not to be the case then we suggest that the proposed LEMP should be compared with what could be achieved in this area without a major infrastructure project taking place. In this alternative scenario it would still be possible for the landscape-scale improvements to be pursued without all the risks involved with species relocation, new habitat creation and post construction restoration.

If the project does go ahead, we would suggest that ownership of relevant parts of the Energy Estate be transferred to reputable conservation organisations such as the Suffolk Wildlife Trust and/or the RSPB together with sufficient funding. These organisations would be better trusted by local people to have the expertise and commitment to eventually deliver the landscape-scale benefits envisaged by the LEMP.

5.4 The landscape of the AONB

Although our principal concern is about the impact of the construction process, we cannot see how the completed structure can be compatible with the AONB designation. The existing power stations are already a blot on what would be a beautiful wild coastal landscape. The new power stations will exacerbate the problem. And if that were not bad enough, EDF now propose four huge new pylons alongside the new power stations, rather than undergrounding the cables as Scottish Power will be doing. Once again, we suspect that EDF's motives are driven solely by its desire to reduce costs.

5.5 Dark Skies and Light Pollution

Our part of Suffolk enjoys low levels of light pollution. On clear nights we are able to see the Milky Way. Dark skies are important to many who live here. The draft local plan has three policies to protect them, namely:

- Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast;
- Policy SCLP6.4: Tourism Development outside of the AONB; and
- Policy SCLP10.4: Landscape Character.

We are particularly concerned about the effect of light pollution during the development process – especially from the main construction complex. EDF's meagre assurance in 2.4.48 in volume 2A of the stage 3 consultation document that it will take such mitigation measure as practicable to minimise light pollution proposal does nothing to allay our fears. We should like to know what these measures are, what the level of

light pollution will be, what effect it will have on our dark skies, what EDF will do to monitor light levels – and what it will do if maximum expected levels are exceeded.

6. People and economy

6.1 Employment opportunities

EDF asserts that *'with a build programme of approximately ten years and 25,000 employment opportunities on site alone, Sizewell C would provide a valuable prospect for economic growth, sustained employment and enhanced skills provision, both for the UK and the East of England.'*

We acknowledge that successive power station developments at Sizewell have provided good employment and satisfying careers to some of our residents and should the development go ahead we support the proposed provision of education, training and apprenticeship resources.

However, the analysis provided by EDF at this stage gives us no confidence that the scale of the employment benefits likely to accrue to our immediate mainly rural neighbourhood is likely to be significant.

EDF's models suggest that at peak the construction will attract 2,030 home-based workers comprising

Civil Operatives	380
M&E Operatives	990
Operational staff	250
Staff and Management	160
Site services, security and clerical All	<u>250</u>
Total home-based workers	2,030

These are expected to be *'mainly drawn from within a 90-minute travel distance of the site, including locations close to the site and also further afield such as Ipswich, Lowestoft, Felixstowe, Colchester, Great Yarmouth and parts of Norfolk'*.

The Consultation document does not provide an estimate of how many of these workers are likely to be based at locations in our Parish or indeed more generally 'close to the site'. Neither does it say how many of these workers will actually be drawn from the existing population, rather than migrate to the area from other parts of the country.

We therefore request that EDF provide more detail on their estimates for the location of home-based workers by occupation type and distance from the site – and how many of them will have come from outside the area.

In the absence of this information we remain sceptical about the scale of the employment benefits to our local area taking into account:

1. the demographic profile of our village with relatively few people of working age;
2. current low levels of unemployment;
3. the absence of suitable sites for new housing (as confirmed by the housing allocations in the latest version of the Suffolk Coastal Local Plan); and

4. without new incoming residents with relevant skills, the most likely job opportunities to be taken up by local residents are in the 'site services' category (which includes administrative, private security, catering and cleaning).

In relation to this last point, EDF states that *'analysis shows that, with relatively small levels of demand for site services and clerical jobs, low skill requirements, relatively high wages, and large availability of labour supply (both employed and unemployed), there should be few problems in meeting the high proportions of home-based recruitment which have been the norm or this category of employment on other power station construction sites'*.

Given the existing demand for some of these services from the local tourist sector we are not convinced that there is evidence for the 'large availability of labour supply' and therefore concerned that the most likely effects may be that the 'relatively high wages' will simply displace workers from existing employers.

EDF argues on the basis of experience of the tourist industry during the Sizewell B construction period that this displacement effect is unlikely to be significant. We request that EDF present further evidence to support this conclusion given the very different labour market conditions (e.g. lower unemployment rates) that now exist and are expected post-BREXIT in future. Moreover, the construction of Sizewell B started shortly after the closure of the former Garrett Engineering Works in Leiston, the area's largest employer – so there was a substantial local supply of qualified engineers seeking work.

6.2 Impact on tourism

The construction of the development will seriously damage the local tourist industry. The site will: create massive congestion; detract from the attractiveness of the landscape; damage the ecology that drives much of our tourism; take cleaners and caterers from the existing workforce; and suck up virtually all the tourist accommodation in the area.

Again, we might accept that these risks were acceptable if the case for the nation needing Sizewell C were stronger. But it is not and we believe that this raises the threshold for accepting unnecessary risks to our important local tourism industry.

6.3 Community

The construction of SZC will have a severe social impact on local communities. With approximately 5,000 workers concentrated in the area we are concerned that, despite the counter-measures proposed by EDF, there may be problems with rowdiness and drunkenness as happened during the construction of Sizewell B. We know from experience (one of our members was a local social worker) that there was a significant rise in single parent families, increased levels of drug and alcohol dependency, a rise in levels of crime, mental health problems and social exclusion all of which is still apparent today and requires a high level of support which, due to cuts in public spending, is not currently adequate.

EDF may say that with Hinkley Point there has been little adverse impact on the nearest town, Bridgewater. It may be right. However, the Sizewell campus and just one of the caravan parks, holding a total of 3,000 people (mainly men) will be within easy walking distance of Leiston. Bridgewater is over 10 miles from Hinkley - not a sensible proposition for a night on the town. Admittedly Bridgewater does have dedicated worker accommodation, but has fewer people than proposed at Leiston. Moreover, Bridgewater has a population of 41,000 as opposed to Leiston's 5,500 so any adverse impact will be diluted.

Leiston does not have a permanently manned police station. Only two police officers cover an area encompassing Wickham Market, Framlingham, Saxmundham, Leiston, Aldeburgh and all villages in between. EDF says that its workforce will be "policed" but only when on its managed sites. The likely outbreak of anti-social behaviour in and around Leiston will be difficult to control and is likely to have a similarly detrimental impact as before on current and future generations.

Come what may, we would expect EDF to pay for extra police officers and community and health workers as required.

7. Transport

7.1 Changes to the transport strategy now evident in Stage 3:

- The marine-led strategy, hailed in Stage 1 as the primary means for delivery and removal of materials, is now effectively dismissed.
- The rail-led option, defined within the previous Consultation Stages as the second tier, is now stated to be severely limited in its ability to contribute significantly to the supply chain.
- Predicted HGV road traffic movements at peak times have effectively doubled as a result of the foregoing points.
- The prospect of some new road construction is now proposed, with provisos and limitations dependent upon whether or not rail plays much of a part.

7.2 The marine-led strategy: is it really 'dead'?

Many of our residents faced with the threat of massive traffic movements on roads through or near the village had concluded that a marine-led strategy for transporting construction materials to the site should still be pursued.

We note that EDF tender a scarcely credible excuse that, due to the government's urgency for a new nuclear station, it does not have time to fully evaluate the building of a jetty. Perhaps EDF should have done more during the two years between Stages 2 and 3? It states that *'a marine-led strategy would necessitate the construction, operation and decommissioning of a jetty. The construction activities (including piling) would result in severe underwater noise which is likely to extend to a radius of several kilometres (km). This is likely to cause significant adverse effects on marine ecology, fisheries and marine mammals, including porpoise. In order to mitigate the impact, seasonal restrictions on construction and a slower construction method would be necessary, although impacts would remain significant.'*

We accept that adverse impacts on the marine ecology are a good reason not to pursue this option but note that significant adverse effects of the development elsewhere are considered acceptable. Why, for example, are these impacts seen as more problematic than the potential impact on Minsmere?

We request that:

- EDF clarifies the criteria under which it considers some but not all adverse environmental impacts to be acceptable;
- State whether EDF has investigated less impactful alternative construction models for the jetty, for example by employing far fewer supports (as can be seen holding up bridges around the world).

7.3 The rail-led option

Given our residents' primary concern with the threat of increased road traffic levels there is general support, should the project go ahead, for a rail-led strategy, which would reduce by some margin the overall HGV movements. However, exactly by how much is not clear, as figures from EDF does not equate, and despite our querying same, it has failed to adequately explain the discrepancy.

But the rail-led scheme must not involve the use of any part of the B1122, as is currently proposed by EDF. Rail-led figures for road traffic now exceed those estimated by them at Stage 1, which even then were considered unacceptable for the size and structure of the road and those affected by its use.

We are concerned, however, about the relatively modest proposed level at peak of just five trains per day, which still leaves such a significant need for HGV movements.

We therefore request that EDF continues to work with Network Rail to seek an increase in the use of rail.

However, many of our residents are also users of the East Suffolk Line passenger services and we expect EDF (with Network Rail and the train operating company) to provide assurances that the current hourly frequency and train capacities will be at least maintained.

We would also request that EDF provides funding to the rail operator to cover the cost of providing alternative bus and taxi services for passengers on the East Suffolk Line in the event of disruption caused by SZC related operations (e.g. a broken-down freight train).

Whether EDF goes for a rail or road option, a rail spur leaving the current Leiston branch line at "Crossing Farm", running straight to the construction site, is imperative. The prospect of 1000+ ton freight trains crossing the B1122 in the heart of Leiston, whether it be at night or during the day, is not acceptable. And the complexity of unloading those trains from a remote railhead, and transferring the material to the site, is just not worthy of consideration.

7.4 The road-led options

Whether or not the rail- or road-led options are adopted, we still need a relief road that will obviate any part of the B1122 from being used. That proposed by EDF running parallel to the B1122 is terrible – and

symptomatic of the lazy, penny-pinching desk-top approach, blithely indifferent to local knowledge or expertise, that runs through the whole proposal.

What is absolutely imperative is, be it the road- or rail-led options, the new road access provisions have to be in place and operative **before** work commences on site. Traffic estimations for 'the early years' are similar to the daily averages envisaged at Stage 1, and are thus unacceptable, as previously stated in 6.3.

Despite the insistence at Stage 2 by our MP, Suffolk County Council and Suffolk Coastal District Council, of proper appraisal of alternative access routes (including the D2, W and others) they are cursorily dismissed in four pages, without proper investigation or explanation – when challenged, 'engineering difficulties' (EDF's words) or other 'disadvantages' envisaged by the company are quoted without detail and without comparison to any similar obstacles presented by the link road options put forward by EDF. These, and their effects, are both considerable and serious:

- the severance of several important minor roads, adversely affecting response times for emergency vehicles and preventing access for residents, particularly those living on the affected lanes, to employment, shops, the doctor, schools etc.;
- the splitting and loss of access to many fields, possibly rendering the future of some farms unviable;
- the crossing and interruption of many water courses and vital ditches, without adequate compensatory balancing ponds;
- the transfer of noise, vibration and pollution from one side of the homes on Middleton Moor and Theberton to the other;
- massively increased emission levels from the HGV and other traffic coming from the south to the site, by virtue of greater distances travelled and frequent dead starts from multiple roundabouts; and
- the interplay with the B1122, B1125 and sundry entries and exits doing nothing to reduce the severely increased likelihood of accidents compared to a more direct access route to site.

As regards this last point, we know from our own experience that the village sees three or four accidents a year on the B1125 alone – most around the bend at Yew Tree Farm and most not reported to the police. The increase in cars and vans will exacerbate the problem. According to an AECOM study 5 years ago, commissioned by SCC, it was intimated that, without a dedicated direct route, around 150 additional serious life-changing or fatal accidents would occur during the construction period. And that was at substantially lower envisaged vehicle levels than is the case now, with no sea and reduced rail assistance.

Suffolk Highways tell us that, even with the two village bypass, a total of four new roundabouts along the A12 means that through journey times will actually increase.

Likewise, the link road will have no lasting benefit – the County may refuse to adopt it and insist that it be removed at the end of the development process. Such short-term solutions hardly constitute a model of sustainability and would leave visible and unsightly scars on the landscape.

See table (Figure 1) for comparison of Theberton By-pass only, the Link Road and 'dismissed' alternatives.

Figure 1 Comparison of Theberton By-pass only, the Link Road and 'dismissed' alternatives

Requirement	B1122 + Theberton By- Pass	Link Road + Theberton By- Pass	D2/W or Option 4*
Route strong enough to endure 10-12 yrs	✗	? part of the B1122 still proposed to be used	✓
Adequate Capacity	✗	? See note above	✓
Least grab of productive land	✗	✗	✓
Least disruption from Junctions, entries and exits	✗	✗	✓
Least disruption at Yoxford from southbound traffic	✓	✓	✗
Least disruption at Yoxford from northbound traffic	✗	✓	✓
Least disruption from B1122 Level Crossing closures	✗	✗	✓
Of most advantage to Sizewell traffic	✗	✗	✓
Most capable of safe sustained speed	✗	✗	✓
Least disturbance to residences	✗	✗	✓
Least disruption of local traffic	✗	✗	✓
Least disruption by local traffic	✗	✗	✓
Route likely to have least accidents	✗	✗	✓
Least effect to the movement of emergency vehicles	✗	? See note at top regarding B1122	✓
Of continuing benefit after construction	✗	✗	✓

*Option 4 is an alternative direct route first proposed by Middleton PC

7.5 Traffic modelling

EDF's traffic modelling is highly questionable and produces inconsistencies that it cannot or will not explain. One example is the seeming loss of at least 300 HGV movements when comparing the rail-led schemes with that for road.

Given that most, if not all, of the modelling has been by remote desk-top studies, it is no wonder that it came as a surprise to EDF that the A1120 in Yoxford is not a two-lane road, but usually subject to single alternate-turns operation, due to parking, which causes backlogs that quickly affect the junction with, and flow on, the A12.

Likewise, we understand the modelling assumes regular traffic flow, whereas in reality a slow-moving vehicle (often agricultural, of which there will always be more than a few) cyclists, or closed level crossing causes convoying and the swift clogging of junctions as a result.

None of the modelling takes into account road closures due to accident, breakdown or carriageway repairs or even short-term delays caused by oil deliveries, dustcarts, unforeseen arisings etc. For example, in recent times the B1122 was closed for a week because of works by Open Reach, and its level crossing closed for 24 hours after a lightning strike. Furthermore, we are convinced by the widespread cracking visible on the road, that the B1122 is not strong enough to bear the additional traffic: even minor repairs, let alone wholesale reconstruction, would cause chaos. And there is no sensible alternate route available.

Most damning, however, is the total lack of information on all the classes of traffic that will be generated during construction – HGVs, LGVs, park-and-ride buses, 'white vans' and private cars – or which routes they might take, given that EDF admits it can only 'control' HGVs and the buses.

EDF has flatly refused to reveal what modelling methodology it has used. This makes it impossible to test the assertion by Jim Crawford, SZC Project Development Director, and other EDF spokespersons, that the roads proposed for access to the site, which includes the A12, "have sufficient capacity" for the additional traffic. And what does sufficient capacity represent? Reasonable traffic flow, with gaps frequent enough to allow safe entry and exit by other users, or nose-to-tail lines of vehicles with no ability for other traffic to join, safely or otherwise?

No method of modelling can address the question of the effect of noise and vibration caused to buildings on or near the route. While EDF lists as one of the objections to D2/W its proximity to the listed Hurts Hall and Leiston Abbey - some 600 metres minimum, it makes no reference to whole communities (Middleton Moor, Theberton and the Yoxford approaches) that lie entirely within that distance - some as close as 2 metres from the road edge. Many of those buildings, some of which are also listed, have no foundations and are in serious jeopardy. Yet queries raised of EDF at Stages 1 and 2 by the relevant householders on this subject remain unanswered.

It has been positively identified that the maps used by EDF to indicate the requisite land for the Link Road and Theberton By-pass are around 40 years old, allowing for buildings that are no longer there and taking the line of the proposed road through buildings that are there now but not shown on its maps. Are EDF's modelling programmes, and the information that it has been fed, also out of date? Since it will not make its results available, we can only surmise.

It is known that there are three other major projects that will run concurrently with SZC, namely Scottish Power Renewables East Anglia One North and Two and the associated National Grid interconnectors, the projected expansion of Great Gallopers and significant re-arrangements at Sizewell B to accommodate SZC. We are told by EDF that some allowance for the latter (at Sizewell B) has been provided within the figures at Stage 3, but no regard has been paid to the other two schemes. EDF's modelling does not include any provision for them, and is thus meaningless in attempting to measure "capacity".



Houses fronting B1122 at Middleton Moor

8. The Consultation Process

What EDF claims to have been consultation in Stages 1 and 2 has been an absolute joke. Even the County and the District said they had too little information on which to base an opinion. EDF asked the public questions like “Should we have a long thin pier, or a short fat one?” We would suggest that, unless one had a degree in hydrology, this was not a question on which one could give an informed opinion. EDF failed to ask such important questions such as “Should we build a relief road, and if so where?” In fact, it told us that under government planning policy, it could not build a relief road at all!

Moreover, EDF has kept the feedback secret. It says that it has framed its Stage 3 proposals in the light of this feed-back. But given its record to date, we have no faith in what it says at all.

The Stage 3 consultation documents are where we should have been at Stage 1. However, distribution of even the Summary Booklet for Stage 3, containing the questionnaire upon which EDF requested responses, was not made door-to-door, as had been done at the earlier stages. One had to either attend one of its presentations to collect it, or be told by someone to request a copy from its office. This has run the risk of seriously limiting the public’s ability to respond.

Printing on the maps on the documentation is so small as to be virtually illegible to anyone without a magnifying glass. And important information has been buried within the detail. We were surprised to find that four huge pylons had suddenly appeared around the proposed reactors, where the lines were previously earmarked to go underground. And after some delving, we established that the road-led option link road appears to sever all the minor roads south west of the B1122, currently used by locals for access to Saxmundham as well as cycling, running and walking.

Come what may, the community has neither been properly nor fully consulted on EDF’s proposals. More consultation is still needed – and it needs to be transparent.

Given its performance in the three consultation exercises to date, we do not trust what EDF has to say - nor the views of its retained experts. We would draw far more comfort from the opinions of unbiased, independent third-party consultants, rather than advocates in the pay of EDF. The company claims it will take measures across the board to minimise the many and diverse adverse impacts of its development both during construction and after. It does not tell us how levels of impact will be monitored, whether it would be prepared to enter into binding agreements not to exceed given impact levels, nor what it would do if such levels were exceeded. It needs to.

Middleton cum Fordley Parish Council

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