

**SAXMUNDHAM TOWN COUNCIL:  
RESPONSE TO CHANGES TO THE SIZEWELL C  
Development Consent Order (DCO)  
DEVELOPMENT CONSENT ORDER SUBMISSION**



Saxmundham is a small market town with a population of approximately 4,500. It is located on the A12 mid-way between Ipswich and Lowestoft and about seven miles west of Sizewell. The Local Plan envisages Saxmundham growing in size by approximately 50% over the next ten years and this will give significant challenges to the town which currently lacks the infrastructure required to support this increase. The East Suffolk railway line runs close to the centre of the town and many of its older buildings which are situated in the town's conservation area.



## Summary

- The Sizewell C consultations have been ongoing for eight years since the initial consultation began in November 2012. Yet, until this point, EDF have shown little sign of listening to local councils and residents' concerns. At this point, EDF have not demonstrated that they can deliver on the proposed changes.
- Saxmundham Town Council (STC) is pleased that a substantial percentage of construction material will now potentially be moved at sea and urges EDF to maximise this strategy.
- The council is concerned about the impact on our community of additional overnight freight trains passing through our quiet town for the entire period of the construction. It also views the proposed disruption to the passenger timetable as having a negative impact on residents and visitors to the area.
- Although there will be a reduction in HGVs along the A12, there will still be other local traffic for the Sizewell development, additional traffic for other proposed energy developments and the additional housing in Saxmundham which forms part of East Suffolk District Council's Local Plan and which has now been approved by the Planning Inspectorate.
- The council is unclear about the proposed changes to the sea defences and queries whether this will leave the existing Sizewell A & B plants at greater risk of flooding together with other coastal areas.
- STC has continuing concerns about the suitability of a new Nuclear Power Station in the centre of an area of outstanding beauty. These concerns have not yet been addressed either by EDF or by central government. As highlighted by wildlife organisations, the project will potentially cause long-term damage to priceless wildlife sites.
- STC hopes that, if consent is given to go ahead with the project, then funding will be available from the Community Fund to help realise the Neighbourhood Plan which is currently being prepared and which will secure the future of this expanding town.
- The council disagrees with EDF's assertion that Sizewell C construction will provide long-term benefits for the area as it has seen little evidence of this in respect of the existing Sizewell B power station.

The council makes the following detailed responses to the proposed changes:

## **1. The Overall Consultation Process**

Whilst welcoming some of the changes that EDF has made to its proposals, the council is bewildered that it has taken eight years of consultations before the strength of public feeling on these issues has been recognised. At this late stage EDF should only be consulting on proposals it is certain it can deliver, e.g. the train and sea transport proposals are far from guaranteed, and relocation of Sizewell B facilities is subject to agreement with Sizewell A. If these indeed are serious options, why has it taken this length of time to propose them? Indeed, some of the proposals were originally put forward and then withdrawn for reasons known only to EDF.

The Council also considers that it is unacceptable that largely unpaid local councillors and members of the public should have to look through thousands of pages of documentation in order to read relevant information for their situation. It proposes that, in future submissions and other projects, the applicant be held responsible for preparing relevant papers for each town and parish in order to minimise this effort.

## **2. Freight Transport**

### **Rail**

Saxmundham Town Council has long argued for the upgrade of the East Suffolk Line to double working throughout its length. The government has clearly demonstrated during the Coronavirus pandemic that large-scale projects can be carried out swiftly when the will is there. Double line working would eliminate the need for overnight freight movements and greatly enhance the capacity of this track which will no doubt be advantageous for other 'Energy Coast' projects.

The possibility of additional overnight train movements on the existing track is of significant concern. There will be seven overnight movements during the five peak construction years with a possibility of nine if the daytime passenger schedule is adjusted. The impact upon town residents which EDF describes as 'having a major adverse effect' both in terms of noise and potentially damaging vibration, is as yet unquantified. Although EDF have mentioned mitigation actions such as double glazing and sound insulation, these will not work on warm nights when residents will have the choice of sleepless nights through high temperatures or train noise.

EDF have stated that around 600 dwellings will be impacted to some extent by the overnight movements. STC requests a list of those houses within the parish. It also questions whether they include the new properties situated near Street Farm Road, particularly in Beech Road, Holly Way and Oak Close since they are not shown on the maps that were provided. Given that the railway cuts right through the middle of the Saxmundham Conservation Area, the council would like to know if vibration effects have been considered on other buildings within this area. We also need to know what changes to the passenger timetable have been considered in order that we may judge the consequences to residents and visitors to the town and challenge them if necessary.

## **Sea**

Saxmundham Town Council welcomes the re-introduction of the marine transport option and urges EDF to maximise the potential for this mode of transport while minimising the environmental impacts of the proposed beach landing facility and jetty. However, it notes that these plans are uncertain as no plan or impact assessment is given for either beach landing facility, or how the materials will be moved to the stockpiles which are at the other end of the site, close to the borrow pits.

## **Road and Associated Vehicle Movements.**

The council notes that EDF are proposing a reduction of up to 30% in HGV road movements with a suggested maximum daily number of 700. However, any difficulties with trains or shipments would no doubt put HGVs back on the roads and EDF has still not clarified where the aggregate would come from. These new proposals would not have any impact on reducing traffic during the first two years, before new roads and Park & Rides would be completed. During these “early years” 600 trucks per day, plus those for other Energy Projects, and all other Sizewell C traffic would use the current A12 and B1122. Additionally, any difficulties with trains or shipments would no doubt put HGVs back on the roads and EDF has still not clarified where the aggregate would come from. Taken in conjunction with ‘local’ tradespeople, Park and Ride buses and other miscellaneous journeys, Sizewell C would still generate up to 12,000 extra vehicle journeys/day, massively increasing traffic on the A12, surrounding roads and making rat runs more likely. The A12 & A14 are already problematic; the Orwell Bridge, EDF’s Freight management facility and new roundabouts will all increase the risk of delays. The prospect of Felixstowe docks becoming a ‘Freeport’ will undoubtedly add to this congestion.

### **3. Sea Defences**

Whilst acknowledging that EDF have rightly adjusted the scope of their sea defences to take greater account of climate changes, the council is unsure of the impact on the existing Sizewell A and B defences and on erosion to the north and south of the Sizewell site. It would welcome clarity on what is being proposed for the protection of the remainder of the nuclear site.

### **4. Environmental Issues**

The council welcomes EDF's decision to change the SSSI crossing design to a single span bridge although it questions whether the widening of the culvert is sufficient to preserve the character of the area. It is what has been asked for all along on the grounds of being the least damaging option. It also notes that the Pillbox field may not need to be used for car parking which is another environmental gain. On the downside, it does not consider the provision of fen meadow habitat at Pakenham is adequate mitigation for the loss of habitat in East Suffolk. Like the other two compensatory habitats at Benhall and Halesworth, this site is miles away and cannot replace rare fen habitat loss in the Sizewell Marshes SSSI. It is also concerned that more trees will be lost from the site as a consequence of changes to the Order Limits. Overall, the council does not feel that EDF has adequately addressed the many concerns of the environmental organisations regarding habitat loss and wildlife disturbance.

### **5. EDF Promotional Activity**

The council notes that EDF has been active in promoting the economic benefits of Sizewell C to the area. This statement is open to challenge as Sizewell B has been in operation since 1995 and, at a recent meeting in the town, Saxmundham was described as "the poorest part of her constituency" by the local MP. EDF clearly needs to demonstrate the long-term benefits to Saxmundham and the surrounding area rather than relying on its PR team. A distinction needs to be drawn between the short-term 'caffeine-fuelled' economy that will be created during the construction works and the continuing benefits that will result as a consequence of the operation. These clearly need to be offset against the losses to the local economy in the hospitality sector and other related areas.

**Saxmundham Town Council 14<sup>th</sup> of December 2020**