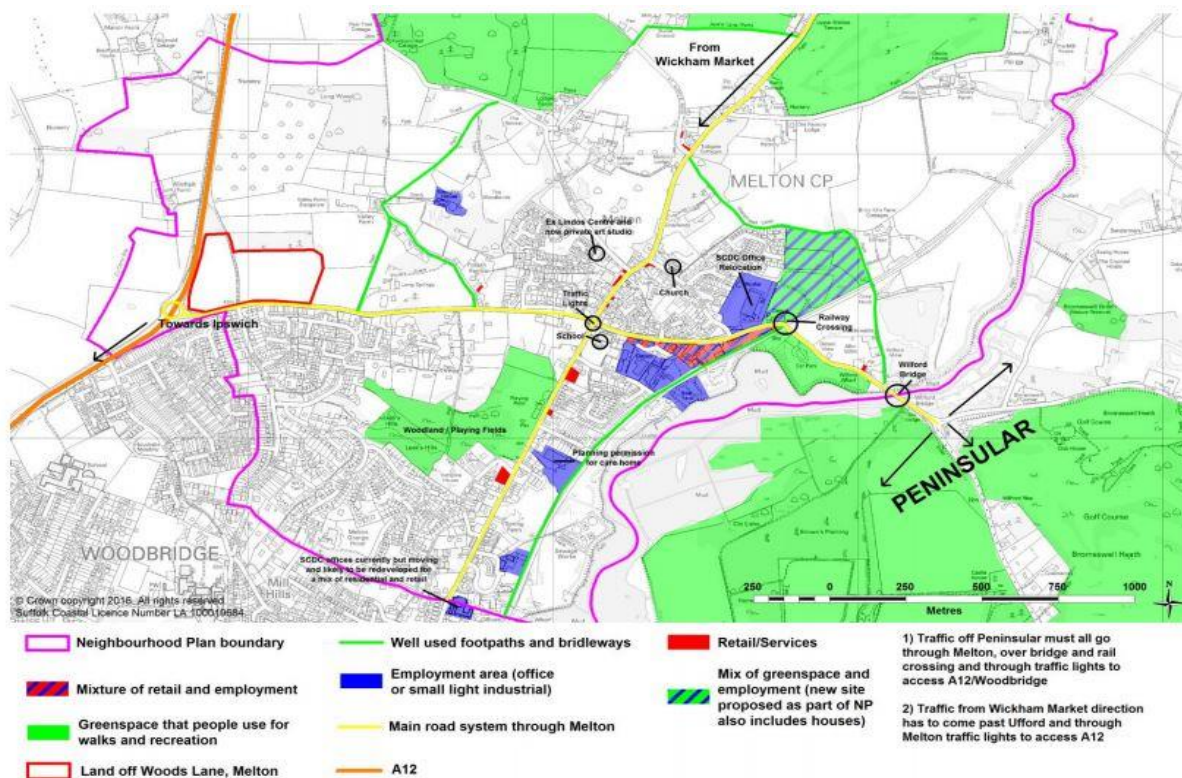


MELTON PARISH COUNCIL'S RESPONSE TO THE SIZEWELL C STAGE 3 PRE-APPLICATION CONSULTATION

Final March 2019

Melton Parish Council

1. Melton is a large village lying on the River Deben. It's strategic role as the lowest crossing of the River Deben brings with it traffic problems. The Local Plan describes Melton as the 'gateway to the AONB'. The only way to the A12 for many neighbouring parishes and almost all traffic from the Deben Peninsula (including Bawdsey, Sutton, Rendlesham and the Bentwaters Park employment area) is to go through Melton via the A1152. Melton also straddles the main north-south road (A12) and rail routes to Sizewell.
2. The A1152 goes past the Primary School, the railway station and an extensive employment/service area. It has two roundabouts at either end as well as a bridge, crossroads with traffic lights and a level crossing, all of which serve to create congestion and raise air pollution. The volume of heavy goods vehicles from villages on the Deben Peninsula, that travel through Melton and along the A1152, has increased dramatically in the last few years.
3. Melton has a healthy employment base, with several employment areas accommodating over 150 businesses. Melton's population has seen significant growth in recent years. There are over 1,800 dwellings in Melton parish and an estimated population of between 4,000 and 4,275. The latest estimates calculate a population growth of 10% in just 4 years. A significant number of new homes are being currently being built or are planned along Woods Lane.



4. The map below highlights the position of Melton Parish Council within EDF's map showing the regional spread of the SZC project.



Process

5. In reaching its responses to the consultation document, MPC has studied EDF's documentation, held a public meeting for local residents and visited some of the locations involved. MPC has also studied Suffolk Coastal District Council's (SCDC) Draft Local Plan setting out proposals for Housing and Infrastructure for the period to 2036.
6. MPC has noted a report, published by Sizewell C Joint Local Authority Group (CJLAG), which explains why Suffolk County Council (SCC) and SCDC are disappointed at EDF Energy's lack of detailed proposals and calls upon the energy firm to work collaboratively to demonstrate the value of the proposed development for Suffolk. This report is important in that it represents an authoritative and independent source of advice on EDF's proposals. MPC takes assurance from the fact that its main findings correlate with the CJLAG report.
7. MPC's response follows the format suggested by EDF's Consultation Questionnaire and focuses on matters most relevant to the people of Melton. As a result, there are a number of areas upon which MPC makes no comment. Headline responses in each area are shown in bold.
8. In the Stage 2 response, MPC supported the benefits that Sizewell C would bring to the local economy, but outlined specific concerns associated with the impact on the environment, local businesses and tourism and the expected disruption within the village caused by an increase of both road and rail traffic. MPC's stage 3 response remains consistent with the views expressed at Stage 2 but expands further on the impact on Melton of new topics that have emerged at Stage 3.

SZC Proposals Overall

9. Melton Parish Council (MPC) recognises Sizewell C's (SZC) potential to deliver benefits, both nationally and locally. That said, even at this third stage of consultation there is still no absolute clarity that the benefits of SZC outweigh the disadvantages. Only when that clarity is available could MPC give its full support.
10. MPC recognises that the UK requires power generation and National Government has decided to include nuclear power in the mix of supply mechanisms. MPC notes also that Suffolk appears to have been nominated as the "Energy Coast" with massive infrastructure projects in Solar and Wind Power generation being put in place alongside the Sizewell C proposals. In return for Suffolk's contribution to meeting the UK's energy needs, MPC would expect careful oversight and co-ordination between these initiatives and greater efforts by bodies such as EDF, Scottish Power and Local and National Government in working together closely to mitigate the likely impacts on the transport system, landscape and the tourist industry.

11. The challenge for EDF is to demonstrate that it will have mechanisms in place to co-ordinate its activities with other strategic infrastructure projects expected over the next fifteen years. As an example: MPC can see no joined-up planning on the construction of 2,300 homes at Brightwell Lakes off the A12 near Martlesham and the possible construction of a Northern relief road to Ipswich, which if built would in all likelihood join the existing A12 near the Woods Lane (Melton) roundabout. To that, could be added the linkage to the proposed A12 Suffolk Energy Gateway scheme.
12. In many areas, EDF's consultation proposals do not provide sufficient evidence of joined-up working between itself and other agencies to deliver:
- strategic road and rail projects
 - employment and economic benefits claimed in the consultation document
 - mitigations to the various dis-benefits of SZC
- MPC's view is similar to the findings of the CJLAG report.
13. It should be added that the majority of Melton people who expressed a view to MPC do not believe that the presumed economic benefits and the mitigations proposed outweigh the very apparent disruption to transport, tourism, local life and amenity. Many expressed their views with heartfelt conviction and were well-informed on the subject. There were environmental and technical concerns that EPR Nuclear reactors have not yet been successfully implemented elsewhere in the world (schemes in France and Finland are behind schedule and above budget). Also, the construction phase would have a heavy carbon cost in the production of concrete and movement of materials and by the time clean energy is being produced in 15 years the Global Warming balance may have tipped irrevocably. To this, could be added the view of some that government should re-appraise the original business case for SZC given the subsequent increased and increasing costs of nuclear energy and the reducing costs of alternative technologies.

Main Development Site: Overall

- 14. EDF describes the landscape, seascape and visual environmental impacts of SZC and its four massive pylons at a height of 65 metres as "significant" and the visual impacts of the main structure as "permanent". This would be, literally, a monumental negative visual legacy within the Suffolk Coast & Heaths AONB for about 100 years. EDF should take action to replace the pylons with a less intrusive alternative.**



15. The four giant pylons were not in EDF's Consultation document. MPC found out about them after the consultation was launched. It is unacceptable to erect four massive pylons in the Suffolk Coast & Heaths AONB. This was avoided with Sizewell B. Given advances in technology, EDF should take action to develop a less intrusive alternative.
16. There are several other environmental impacts of SZC. All are subject to mitigation. Some mitigation plans are more advanced than others. A number of very important mitigations are still to be finalised, being subject to ongoing research and assessment - most notably, Ecology, Sea Defence and Coastal Processes. EDF must provide assurance that all the mitigations to environmental impacts will be developed and implemented to a quality that would satisfy scrutiny by an independent regulatory body.

People and Economy

- 17. MPC is concerned that the Suffolk community's ambition for SZC to drive local upskilling and to increase the proportion of high-end jobs filled by local people will fall short of expectations.**
18. MPC welcomes the launch of EDF's Apprentice scheme. Apprentices will, it is said, study at Universities in the South West of England and gain work experience at Hinkley Point. MPC believes that EDF should make access to the scheme easier for the young people of Suffolk by arranging for the study and work experience programme to be based locally.
19. MPC also welcomes EDF's work with others on developing an Employment & Skills Strategy. The strategy must be backed-up by all relevant parties signing up to an action plan and firm commitment to invest resources.
20. EDF expects that only 290 (15%) of the 1,910 professional and management (i.e. high-end) jobs in the construction phase will be sourced locally. EDF should develop plans to raise that proportion.

21. MPC welcomes the plans for 900 permanent (mainly high-end) jobs in the operational phase but is concerned that the proportion to be filled by local people may mirror the picture at the construction phase.
- 22. EDF's document describes worthy policies for: upskilling and workforce; the supply chain; accommodation, tourism; housing and communities. But to deliver fully the benefits/mitigations that are claimed for each of its policies, EDF must engage more with local authorities and other relevant bodies. EDF should also enter into binding multi-agency agreements, underpinned by action plans and adequate resources to deliver jointly agreed outcomes.**
- 23. EDF's indicative contributions to three new Funds to mitigate SZC-related negative impacts in Tourism, Communities and Housing appear to be inadequate.**
24. EDF proposes the creation of a Tourism Fund, a Communities Fund and a Housing Fund to ease the negative impacts of SZC in each of those areas. The contribution amounts may be based on EDF's experience at Hinckley Point. There is great concern that EDF may make relatively small financial contributions up-front, at which point the risks and excess costs pass to local councils and tax payers. MPC's view is that EDF's levels of contribution should either be based on an independent assessment of need, or determined during negotiations of multi-agency agreements.
25. The Proposed Housing Fund, using Hinckley Point figures (£8.5m) as a measure, appears completely insufficient to mitigate the adverse impacts on the local housing market. The sufficiency of the proposed Communities Fund, using Hinckley Point figures (£20m) as a measure, to offset the increased demand for public services from the workforce in the construction phase, is difficult to judge. For example, EDF makes no specific mention of a contribution to cover additional policing costs during the construction phase.
26. Tourism is worth £2billion a year to Suffolk. EDF's Tourism Fund (applying the indicative contribution levels above) would appear inadequate to mitigate SZC's likely impact on tourism over the 9-12 years of construction and beyond. For example, just a 1% dip in tourism would cost Suffolk £20m per year, with consequential job losses.
27. A suggestion that emerged from MPC's consultation event was for EDF to consider using the site itself as a tourist attraction, by offering guided tours during the construction phase.
28. MPC welcomes the extra business that SZC will put into the local supply chain. For the claimed benefits to be realized, the supply chain will need to be supported

and developed by way of better joint working between EDF and the relevant agencies (as described in bold above).

Accommodation

29. MPC broadly accepts the proposals for the main accommodation site, though it would like to see clear evidence of EDF's willingness to meet additional community costs in policing etc. and it regrets that there is no legacy to Leiston from the accommodation site construction.

Transport Movement of Materials

30. MPC is disappointed that the previously preferred Sea-Led strategy has been abandoned. If Sea-Led approaches cannot be adopted, MPC's view is that a Rail-Led strategy is more appropriate than Road-Led, as it is important to reduce the burden on Suffolk's limited road network.

31. EDF should give a clearer explanation of how often seaborne landing is intended to be used and for what type of load.

32. EDF should explain why the maritime led strategy having been dismissed, did not consider the use of seaborne landing and/or portage via Lowestoft and Felixstowe, with rail transport from these established ports reducing the transport impacts on Suffolk's undeveloped road system.

33. If a Rail-Led strategy is implemented, there will be significant impacts on Melton given its important railway level crossing cuts across the main flow of traffic to the peninsula. MPC would expect close liaison between EDF, Network Rail, MPC and other local bodies to make all necessary changes to improve the flow of traffic in this area.

34. The passage of additional trains will cause additional delays to road traffic in Melton. Melton Crossroads is already being regularly monitored for its worrying levels of pollution. It is to be noted that the traffic statistics quoted in the latest consultation documents are wrong. For the Melton Station Level crossing, the numbers quoted are understated by a magnitude of 3000%. The Melton Level crossing currently carries approximately 18,000 vehicle movements a day rather than the 550 quoted in EDF's consultation document.

35. MPC suggests that to improve traffic movement and reduce the build-up of pollution in the heart of a residential area (adjacent to Melton Primary School), the Melton Station level crossing should be upgraded and the current dog-leg configuration straightened out to avoid HGVs and farm

vehicles having to straddle both sides of the road, thereby holding up traffic. This would be a significant beneficial legacy.



36. With regard to air pollution, 3 new monitoring sites have been added at the Melton crossroads in order to confirm concentrations at key points in this locality due to increasing traffic from the Peninsula. The latest readings for Melton (2017) show an increase in air pollution; in contrast to some other neighbouring areas where the trend is downwards. There is no doubt that traffic through Melton is heavier now than it was in 2017.

37. If rail improvement work has to be done at night, then Network Rail needs to avoid undue disturbance to the population by banning work between midnight and 6am in residential areas.

38. MPC would also want assurances that during any upgrade work, impacts on passenger services, vital for Melton people commuting to Ipswich and beyond, are minimised.

39. If 40-wagon length goods trains (10 movements a day) are going to pass through Melton on their journey to and from Sizewell, these should be scheduled to avoid times of peak traffic flow over Melton Level crossing. There should be no movements through Melton between Midnight and 6 a.m.

40. EDF proposes to build a passing loop between Melton and Wickham market. MPC suggests that for little extra cost “double tracking” could be put in place on this section, all the way to Saxmundham. This would reduce the risk of delays on the line and provide a significant beneficial legacy.

41. In either Road or Rail-Led strategies, MPC wants assurance from EDF that HGV traffic would not be routed through Melton to Sizewell via Snape at times of congestion on the A12.
42. MPC also wants EDF to work closely with “Suffolk Highways” to improve signage to discourage “rat-running” of traffic from the A12 (congested as it will be with construction traffic) through Melton, for example through The Street, Station Road, Wilford Bridge Road and Saddlemakers Lane.
43. Traffic flow along the A12 past Woodbridge and Melton could be improved significantly by addressing the bottlenecks that occur near the Seckford Golf Club roundabout and near Bredfield when two lanes reduce to one. MPC suggests that EDF consults with local authorities and considers offering a contribution towards improving the road at this point. This would be a significant beneficial legacy.
44. EDF should confirm what its proposals are for accommodating Road Traffic, when the Orwell bridge is closed and when Operation Stack is in effect at Felixstowe port.

Transport: Sizewell Halt

Transport Buckleswood Road

Transport Level Crossings Saxmundham to Sizewell

45. MPC has no comment on these areas

Transport Level Crossings

- 46. MPC’s view is that the Melton/Bromeswell pedestrian crossing should either not be closed or EDF/Network Rail should install a footbridge.**
47. EDF proposes that the Melton/Bromeswell pedestrian crossing be closed and 5 diversion options are on offer. Only Option 2 preserves the ability for pedestrians to cross the railway line at this point and that proposal (a diversion that goes underneath a 4 foot 6 inches high railway bridge, see below) is flawed as the route is very likely to be flooded and hazardous.



48. The existing crossing is a much valued and much used local connection between three communities Ufford, Melton and Bromeswell. The usage figures given in EDF's documents are severely understated. There have been no accidents or incidents on this crossing and visibility is clear for 1,000 metres in either direction. Given there will only be an additional 10 trains per day at the peak of the construction period, our view is that the crossing should stay as it is. If it cannot, then either EDF or Network Rail should pay for the construction of a footbridge.

Road-led strategy Freight Management Facility

49. Given the limitations of Suffolk's roads and the fact that even under the rail-led strategy, there will be a significant level of extra road traffic expected, the Freight Management Facility should be provided within both the Road-led and Rail-led strategies.

Transport Park and Ride

50. Given the new housing developments and additional traffic at the Woods lane roundabout, the adjacent area is now even more unsuitable for a Southern Park & Ride site than it was at Stage 2. We are pleased that this option has been removed.

51. MPC believes the mitigations proposed to assist traffic flows into and out of the Wickham Market Park and Ride will be problematic, but detailed comments on this will come from the representatives of Wickham Market. However, MPC believes it would be counter-productive to artificially narrow the A12 to one lane in a Northerly direction near Wickham market to facilitate entry onto the road from the Park and

ride. It was also noted by local residents that this part of the A12 is considered to be an accident black spot. If necessary EDF should fund the cost of an extra access lane and make sure that there is appropriate mitigation to prevent accidents occurring as a result of slow or queuing traffic in the area.

52. MPC notes that since the last consultation the proposed capacity of the Park & Ride areas has been increased by 25% (1,000 to 1,250). This suggests that other traffic estimates might need similar upward revision.

Northern Park and Ride at Darsham

53. MPC has no comments on the proposals for the Northern Park and Ride at Darsham.

Transport: A12 two village by-pass

54. In MPC's view, a four-village dualled by-pass should be built under either the Road-led or Rail-led strategies to alleviate both existing high traffic levels and the SZC-related increase in local traffic. This would represent a significant beneficial legacy.

55. A four-village dualled by-pass should be built under either the Road-led or Rail-led strategies. MPC has noted EDF's proposals for a two-village rather than a four-village by-pass. MPC has also noted EDF's statement that it "supports the principle of a four-village bypass scheme" if delivered in an appropriate timeframe for the Sizewell C development. EDF says it supports Suffolk County Council's Suffolk Energy Gateway scheme and is prepared to provide a financial contribution in lieu of the two-village bypass. Given the widespread principled support for a four-village bypass, this represents another opportunity for EDF, National Government and Local Government to co-operate and better co-ordinate the planning and financing of a major infrastructure project. MPC would like to receive assurance that this will happen.

Transport Road Improvements

56. MPC has no comments.

Consultation Process

57. MPC endorses the Sizewell C Joint Local Authority Group's (CJLAG) calls for EDF Energy to be collaborative and to urgently share more detail and information to satisfy current concerns about the SZC proposals.

58. MPC has appreciated the work of Planning Aid and EDF in providing briefings, support and materials for our local consultations. However, it is disappointing to see a shortage of detail on proposed strategies e.g., the time scales for upgrading the roads and railways in the area.
59. It was also disappointing to find that the statistics quoted for the traffic flow and footfall at railway level crossings were woefully understated. This gave rise to some concern that other information may be wrong within the document and the effect this might have on the figures quoted as the estimated impact on traffic, work force population, effect on local economies i.e. tourism, etc.
60. EDF should consider what other actions it might take in Consultation to reach the young people of Suffolk who will be the most impacted. EDF should re-assure itself and others that it has spoken sufficiently to schools and colleges regarding its proposals for apprenticeships and other career opportunities?
61. EDF should organise enough “out of working hours” events to reach those of the population who work full- time.
62. MPC notes that the CJLAG report calls for EDF Energy to be collaborative and share more detail and information to satisfy current concerns. CJLAG offers to work with EDF Energy to help them develop their proposals and to resolve the necessary mitigation, in advance of their submission of an application to the Planning Inspectorate. MPC strongly endorses this proposal.

MPC, March 2019