

# MELTON PARISH COUNCIL

# Response to the Sizewell C Stage 2 Consultation by Melton Parish Council

#### **Question 1 - Sizewell C Proposals: Overall**

Melton Parish Council supports the benefits that Sizewell C will bring to the local economy, but we have specific concerns, as outlined in the rest of this submission. Please note that we are restricting our comments to those areas which we consider to have a direct effect on Melton, or which relate to areas in which Melton Parish Council has responsibilities to the residents of our village. We are not commenting in this response on matters that we consider to be the domain of other parties, nor on matters that rest either on expertise in a particular field or on personal opinion.

#### **Question 2 - Main Development Site: Environment**

Melton Parish Council is not commenting specifically on environmental impacts at the main development site.

However, we are concerned about the potential for increased air pollution at specific points in Melton and Woodbridge, due to traffic-related issues exacerbated by access measures proposed for the Sizewell C construction (further details are in our responses to Questions 8 and 11).

We are also concerned about the effect on coastal deposits that might arise from the potential release of debris into the sea (intentional or otherwise), and from the building of a jetty and the resultant shipping behaviour. In particular, we would like a better understanding of the likely effects at the mouth of the Deben Estuary, as this may have consequences for the River Deben and hence for Melton. Melton is situated close to the most inland navigable point on the River Deben, and some businesses within the village depend on the river for their livelihood. Any impact on access of boats to the Deben, or on silt deposits in the Deben, would have an impact on Melton.

# **Question 3 - Main Development Site: New Access Road**

No submission

# **Question 4 - Main Development Site: Managing Construction Materials**

Melton Parish Council has no preferred option. We will be satisfied with any solution that protects and maintains the integrity of Suffolk's heritage sites, tourism, agriculture, ecology and environment, and that minimises the visual impact of site features, provided that the land is made good and returned to its original condition at the end of construction. Maintaining these elements in the long term is important to Melton's position as an access point for Suffolk Coastal's Heritage Coast and for tourist destinations and nature sites in the region.

# **Question 5 - Accommodation: Overall Strategy**

Melton is in the commuter zone for Sizewell, lying east of the A12, so is potentially a location where workers will wish to live if they are accommodated off-site. Currently, 75% of properties in Melton are owner-occupied, and 12% are private rental. There is concern that Sizewell workers may put pressure on the already-stretched local rental market, pricing it beyond the reach of local people, and that this may also affect the local housing purchase market if potential landlords see buy-to-let opportunities. However, Melton Parish Council accepts that this effect cannot be predicted accurately, and our main concerns about housing pressure relate instead to the knock-on effect on our roads (which we will cover later in this submission).

We would like to see the Sizewell site/campus accommodation reused, where possible, after it is no longer needed by site workers. Units could be donated to the community for reuse, or relocated and adapted for social need such as emergency housing that would benefit all of Suffolk Coastal. We also wish to see the sports and recreational facilities passed onto the community in the Leiston area for legacy use, since this would enhance recreational facilities for a wider geographical area.

#### **Question 6 - Accommodation: Campus Layout**

Melton Parish Council is not commenting on the specific options offered. However, we would like to see the accommodation designed and laid out in such a way that it has the potential for legacy use (for example, as affordable housing), which would suggest that smaller non-campus developments would be preferable.

# **Question 7 - Transport: Overall Strategy**

On balance, Melton Parish Council supports a preference for sea over rail, and for rail over road, since we consider our road infrastructure and traffic capacity to be inadequate to handle any increased burden. In principle, we support the use of Park and Ride facilities to minimise road movements, and we also welcome the proposal for a parcel consolidation facility and for route controls to be imposed on HGVs. However, we have specific concerns in all areas, as identified in our responses to subsequent questions.

#### **Question 8 - Transport: Rail**

Although Melton Parish Council welcomes transport measures that take pressure off the roads, and we therefore (in principle) support the use of rail, Melton will be directly affected by any increase in rail traffic, and some aspects of the proposals require mitigation.

Melton has a railway station and a level crossing, co-located on the A1152 on a difficult bend. The A1152 is the sole road crossing on the River Deben, and the main access route to the Deben Peninsula, Snape, Rendlesham, Orford, and so on (and to the "local road" non-A12 route to Sizewell). Traffic is already heavy at peak times of day, and safety is an ongoing concern.

- If the volume of rail traffic is to increase, there needs to be a review of the safety of level crossings along its route (our particular concern being the level crossing in Melton, and the unmanned crossings that need to be negotiated in order to reach individual dwellings). This review needs to take into account the increased road traffic volume that will result from both Sizewell commuting and planned future housing development in Melton. Future housing developments have not been taken into account in traffic estimates to date, and a number of large new developments have been tabled recently.
- A balance needs to be struck between using night trains and day trains to transport materials to Sizewell. There are significant drawbacks to Melton residents with both approaches:
  - Night trains will disrupt residents through increased noise levels. Some of the noise is generated by the train's engine, and from the train's progress along the tracks, and from the horn that must be sounded as the train approaches the station. But the main noise concern is from the automated alarm that sounds at the level crossing. The alarm is disruptive to residents nearby, and its sound travels widely (capable of being heard across much of the village), and we would wish to

minimise its use at night, and to ensure that at night-time the noise level is set to the lowest level possible (adjusted automatically, for example in line with the streetlight switch-off). In particular, we wish to propose that no trains run between midnight and 5 a.m.

- Daytime trains (identified in the Consultation Document as being the preferred approach) will cause the level crossing to be closed for potentially significant periods, causing resultant tailbacks and increased air pollution along the length of the A1152. This contributes to the traffic concerns which are covered later in this submission. Accordingly, we would strongly object to the passing of trains at times of peak road-traffic flow. Improving the level crossing and road shape at Melton Railway Station would mitigate this.
- We ask EDF to take measures to minimise the noise impact on the village of Melton, perhaps introducing tree-screening and other sound-screening to cut down on noise transmission, and ensuring that trains implement measures to reduce and control the noise that they produce.
- In general, since we are broadly supportive of rail as a transport mechanism that reduces road traffic, we would welcome an increased passenger service as an alternative for commuters travelling to Sizewell, although we understand from the Consultation Document that there is little scope for adding to the existing passenger timetable.
- We would prefer rail improvements to be a permanent legacy rather than a temporary measure. We therefore support the introduction of a passing loop (preferably in the form of double-tracking) at Campsea Ashe, with the long-term aim of adding an additional platform at Wickham Market station.

# **Question 9 - Transport: Sea**

Melton Parish Council supports using sea transport to relieve pressure on both road and rail. However, we wish to minimise the impact on the amenity of Sizewell beach, and we wish the beach to remain open for as long as possible, to maintain its attractiveness as a tourist location (thus maintaining Melton's relevance as a destination or stopping-place for visitors to the region).

We ask to see further details of how the proposed beach landing facility and jetty are to be policed, since smuggling and people-trafficking are a stated priority of our local police force. In part, we would like to ensure that such illegal activities are strictly prevented at the site, but we also want to avoid diverting our sparse police resources towards such activities when our local priority is for providing neighbourhood policing in Melton and the surrounding areas.

We do not wish to present a preference for any specific option related to the sea delivery of materials, but we ask EDF and their consultants to consider any likely effect of the chosen option (and its resultant effect on shipping patterns) on the shifting shape of the Bar at the mouth of the River Deben.

#### **Question 10 - Transport: Park and Ride**

Melton Parish Council is pleased to see Wickham Market as the preferred option for the Southern Park and Ride facility, and we support that option (subject to the findings of the planned archaeological survey). However, Woodbridge/Melton is still shown as a reserve site. If Wickham Market were to prove unsuitable after all, necessitating a change of plan, please note that we would strongly object to pursuit of the Woodbridge/Melton reserve option in its place, particularly in view of recent planning decisions to allocate additional housing development at that roundabout. Recent and in-progress planning approvals will greatly change the traffic profile at that junction and on adjoining roads; previous traffic studies have not taken the new planned developments into account. Another major objection would arise from the lack of pedestrian access to that site from Melton village, precluding its use by workers living in Melton unless they use a car to cover the short distance to the facility.

To cut down on traffic through the villages (including Melton) and on rural roads, and to enable access to any Park and Ride facility for those who don't drive, please consider providing a local shuttle bus to take workers to the Park and Ride facility, or consider offering an EDF-sponsored public bus service with scheduled stops (at suitable times) at the Park and Ride.

# **Question 11 - Transport: Road Improvements - A12**

Of the specific options proposed for the A12 in the questionnaire, Melton Parish Council would support any reasonable solution that improves traffic flow with minimal disruption to residents, as we consider that this would be beneficial to the people of Melton who use the road and to people using the A12 to reach Melton. We would therefore support any of the by-pass options (the "no change" and "Farnham bend road widening" options being deemed unsuitable, as not achieving this goal). Our preference would be to support neighbouring parishes in their desire for a four-village by-pass on the A12 (as described at <a href="http://www.a12bypass.co.uk">http://www.a12bypass.co.uk</a>), although this option is not currently included in the consultation.

Aside from the traffic issues in villages to the north of Melton, we have concerns about traffic movement on other sections of the A12 locally, requiring mitigation through road improvements.

Any existing traffic projections for the Woods Lane roundabout on the A12 at Melton are out of date, since existing modelling pre-dates recently approved housing development plans that will have a major impact on traffic flow at that point (as will other relevant housing development proposals in Melton, currently in the planning permission process). We ask that a new traffic data collection and modelling study be undertaken at this specific location, taking account of traffic projections arising from housing developments that have already been approved and those that are in the process of seeking planning approval, even though they are not yet built. This is a key junction for through-traffic on the A12 to Sizewell, for the A1152, and for Melton itself, and it seems odd that the Woods Lane roundabout has not previously been selected as a data point.

The traffic flow data in the Consultation Document makes no specific mention of the Melton stretch of the A12, the nearest data collection point being "A12 Woodbridge (location AA)", but as the A12 is the nominated route for Sizewell C traffic, it seems reasonable to apply the same figures to the A12 at Melton. In Table 6.5, current modelling for location AA suggests an average increase of 45% in HGV and bus flows, with a 72% increase on "Busiest Day" projection. There are several areas of concern in light of this projected increase, for which Melton Parish Council seeks mitigation.

Firstly, the stretch of the A12 at location AA (between the Seckford roundabout at the end of the Martlesham by-pass, and the Wyevale roundabout at the Grundisburgh turn-off) is subject to considerable congestion at various times, both through predictable daily traffic and through less-predictable seasonal traffic such as holiday visitors. There is a pinch-point at which the two-lane dual carriageway drops to single-lane, and this causes tailbacks. When drivers approach that stretch of road and see the tailbacks, they frequently divert at the Seckford roundabout and instead take a rat-run through Woodbridge and Melton, causing traffic congestion in the town and village, and adding to the already excessive pollution figures at points along the route. Since the projected increase in HGV and bus traffic at location AA will unavoidably add to this congestion, Melton Parish Council is anxious to reduce the traffic using the rat-run as a through route. To mitigate this, we ask that the stretch of the A12 between these two roundabouts is converted to two lanes in both directions, so that the pinch-point is removed and traffic flow facilitated.

Secondly, there is a similar lane reduction on the A12 between the Woods Lane roundabout (Melton) and Wickham Market, when the road drops to single-lane. Under existing traffic conditions, this part of the A12 is difficult to cross, or to join in a direction opposite to that of the traffic flow on that side of the road. With the projected increase in HGV/bus traffic, and with the nearby location of the planned Southern Park and Ride facility, we ask that consideration be given to facilitating local traffic when the Sizewell C traffic further increases the main flow. To prevent the same problem developing here as at the Seckford pinch-point, we also ask that consideration be given to making the road into a dual carriageway.

Thirdly, Melton Parish Council recognises that any impediment on the A12 drives the traffic onto Melton's roads, and that this will undoubtedly be exacerbated through a 40% to 72% increase in HGV/bus traffic. There will be a further increase in through-traffic due to drivers accessing the Southern Park and Ride site, and due to drivers deliberately avoiding use of the either the Park and Ride facility or the nominated A12 route. We welcome the measures that EDF are proposing for restricting HGV access to nominated routes, on condition that they can be (and are) enforced, but

there appear to be no similar measures suggested for private vehicles accessing Sizewell or its Park and Ride sites.

Melton offers two undesirable shortcut routes to through traffic, both of which are likely to suffer increased Sizewell-related traffic. The village lies on a non-A12 rat-run from the A12 south of Woodbridge to Wickham Market (via Melton Hill and The Street in Melton, then Ufford), and also on a perpendicular non-A12 rat-run to Sizewell itself from the west (via the A1152 then Snape). These two routes intersect at Melton cross-roads, where air pollution levels are worryingly close to the upper limit, and where Melton Primary School is located. We have particular concerns about any increase to traffic on the A1152 between the A12 and the small roundabout beyond the level crossing in Melton. Woods Lane offers only a narrow footpath for pedestrians, on only one side of the road, and existing traffic projections do not take account of the extensive new housing development that has been approved there. Sizewell C's rail transport plans, with increased numbers of long trains and resultant closures of the road, will lead to further hold-ups at the level crossing (with resultant increase in traffic congestion and pollution) and further worries about safety on that stretch of road. In particular, the bend in the road at the railway station causes problems, as lorries need to use both sides of the road in order to get round it, and there is an unwarranted speed limit of 60 m.p.h. on the approach to Bromeswell; both factors have major safety implications in light of any increased traffic volume. Melton Parish Council supports the use of rail rather than road for freight transport, but the negative impact on traffic flow and public amenity in Melton needs to be mitigated through road improvement at the level crossing.

We ask EDF to introduce signage and other measures to ensure that all Sizewell-related traffic (not just HGV) is dissuaded from taking short-cut routes through Melton.

Finally, in considering any improvements to the A12, Melton Parish Council wishes to stress the ongoing need to take into account any potential building of a northern bypass around Ipswich, since the initial suggested routes include two that affect Melton's traffic flow (terminating at Melton and Woodbridge, respectively).

# Question 12 - Transport: Road Improvements - Yoxford/B1122

We and many residents in Melton support local parishes in their campaign to mitigate traffic problems by building a "D2" relief road to by-pass the B1122 (http://teags.org/transport/).

#### **Question 13 - People and Economy**

Melton Parish Council wants to see our local economy thrive. To that end, we are anxious to ensure that the traffic build-up and congestion arising from Sizewell C's rail and transport policy do not harm our small businesses by making it unattractive or difficult to stop off in Melton or to visit business premises.

While not a recognised tourist destination in its own right, Melton is a gateway to the tourism, heritage and nature attractions of Sutton Hoo, the Deben Peninsula, the Heritage Coast, Suffolk Coastal's heathlands, the Sandlings Walk, Orford, Snape, and beyond to Aldeburgh, Thorpeness and Sizewell Beach. We want to maintain the integrity and attractiveness of this area for visitors, both in principle and because of the economic impact in Melton (for example, through holiday property rentals or the local hospitality trade). Tourism in the area must not be undermined by the Sizewell C construction, nor by its effects on the local housing market and economy. Aside from access issues already covered in our responses on traffic and roads, this means that we do not want visitor destinations to be degraded in any way. We trust that sites such as Leiston Abbey and Minsmere will be handled sensitively, and that other parties are responding to your Questionnaire accordingly.

In light of that, we also wish to make a plea regarding the visual impact of Sizewell C itself. Sizewell B is an emblem of the Suffolk Coastal area, and proof that a modern power station can be visually attractive and not just a blot on the landscape. We understand that the Arts Council were involved in the aesthetic design of Sizewell B, and request that similar consideration be given to the aesthetic appeal of the Sizewell C construction. Big ugly blocks of concrete do not look good on postcards or

on promotional websites, whereas Sizewell B looks striking and is relatively sensitive to its surroundings of sea, beach and sky.

Many of our local businesses are property-related, and we wish to ensure as much protection for these businesses as possible. In particular, we ask EDF to consider offering landlords some protection against non-payment of rent by employees and contractors (for example, by guaranteeing payments, and by enforcing compensation payments where needed).

Alongside our desire to protect and promote local businesses, Melton Parish Council hopes that the Sizewell C development, from its earliest phases through to operation, will create lasting employment opportunities for the people of Melton, and we want to maximise such opportunities for local residents.

In the long term, this means that we want the young people of Melton to see Sizewell as an attractive future employer, and we want them to be both equipped for employment there (in all spheres of work) and enabled to take advantage of employment opportunities. However, there are physical barriers that make such prospects difficult. Our young people need better public transport services so that they can reach educational facilities (in Ipswich or elsewhere), and we ask EDF to consider sponsoring such services as part of their plans to engage with young people through schools outreach or apprenticeship recruitment.

The Sizewell C project is very long-term, and we would like to see EDF engaging in nurturing future young employees well in advance of any potential employment, and not just cherry-picking those who are already on the job market at a particular point in time. We have a specific concern in Melton regarding the potential long-term engagement of our young people. Although Melton is (on average) a prosperous village, it is a pocket of hidden income deprivation in which the overall index masks a very real problem. In 2016-17, 28% of the children at Melton Primary School triggered pupil premium funding, as reported in the government's "Pupil premium final allocations 2016 to 2017 by school in England"

(https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/541197/2016-17\_Pupil\_premium\_School\_level\_allocations \_-v2.xlsx). The Ofsted inspection in September 2015 found that "the proportion of pupils who are eligible for free school meals has gone up to nearly a third and this is higher than usually found". Yet the University of Suffolk's "Hidden Needs" report to Suffolk Community Foundation in the autumn of 2016 states that "only 33% of children receiving free school meals achieved five good GCSEs, compared with 70% overall" and that "children in poverty in Suffolk do less well [educationally] than children in poverty in schools elsewhere". Melton Primary School is a good school, with an excellent and committed head teacher, but Melton Parish Council wants to make sure that the children of Melton are not held back in future life by their relatively high level of early disadvantage, and we want them to be equipped to make the most of the long-term employment opportunities that Sizewell C can offer. To that end, and bearing in mind the very long timeframe for the Sizewell C project, we ask that EDF form a close relationship with Melton Primary School, perhaps offering educational visits and sponsorship, to encourage the children's aspirations at an early stage. We believe that early intervention, before disadvantaged children become disengaged with the education system, could prevent them from falling behind in their ability to benefit from the opportunities that Sizewell C will present, and could enhance the employability of Melton's young people (and their interest in Sizewell) in the longer term.

The influx of new workers to the Sizewell C site will undoubtedly cause a heavy drain on local resources. We want to see more information on the projected burden that will be placed on school places, medical support and policing, and we are disappointed that this information will not be available in time for meaningful response from the public. Introducing such data as late as the Stage 3 Consultation will leave little scope for substantive input or amendment. Melton Parish Council has particular concerns about the provision and funding of police cover; we want to see EDF fund additional police resources in the areas closest to the site, so that already-restricted police resources are not diverted to those areas from our more distant village.

The Consultation Document suggests that EDF may consider introducing a dedicated communications and community relations hotline, and Melton Parish Council supports this proposal.

#### **Question 14 - Consultation Process**

Melton Parish Council appreciates the detailed documentation that EDF has distributed in accessible formats, as well as the digestible summaries, the open access to local exhibitions, EDF's willingness to send representatives to talk to public meetings and to local groups, and the range of options for submission of comments. We are also grateful for the guidance and advice made available through Planning Aid England.

However, it is a long time since the Stage 1 Consultation finished, and the composition of Melton Parish Council has changed since then, with a high proportion of new councillors who had not been involved in the previous Sizewell C consultation. In light of that, the short duration of the Stage 2 Consultation phase and its timing (over the Christmas and New Year holiday) could certainly have been improved. For the Stage 3 Consultation phase, we request that more notice be given, and that the duration of the consultation be extended to ensure that there is time for respondents to fully consider the proposals.

**Melton Parish Council** 

25 January 2017