

**RESPONSE TO SIZEWELL C (SZC) CONSULTATION ON PROPOSED CHANGES TO THE  
DEVELOPMENT CONSENT ORDER (DCO) - December 2020**

v9

**EXECUTIVE SUMMARY**

- A. The consultation period is inadequately short and does not allow for effective engagement with residents on matters that affect them.
- B. Melton is affected greatly by the transport strategy for SZC because key road (A12 and A1152) and rail (East Suffolk line) routes to Sizewell all pass through the parish.
- C. MPC has always supported a modal transport strategy for the movement of bulk construction materials that gave priority to sea over rail and rail over road. We support, in principle, EDF's proposals to reduce HGV movements, subject to the implementation of significant mitigation measures.
- D. MPC does not agree the proposal for multiple overnight freight train movements through Melton for a period of 11 years. EDF has guaranteed no freight trains through Leiston between 23:00 and 07:00 and should do the same for Melton and Woodbridge. We repeat our previously stated request that the East Coast line's capacity be increased, particularly between Melton and Saxmundham. This would improve the line's resilience and allow EDF's freight trains to run in daytime.
- E. EDF must mitigate the effects on households of rail noise (including barrier audible warnings overnight) and vibration. MPC's concern is that residents' real-life experiences of train noise and vibration are far more profound and intrusive than EDF's interpretation of its technical measurements. This is a complex subject and MPC takes assurance from the fact that EDF is working in consultation with ESC and SCC on a Rail Noise Mitigation Strategy and a Noise Mitigation Scheme.
- F. Even if SZC's plan to reduce HGV movements is realised in full, the project's significant extra HGV movements would exacerbate the already unacceptable traffic congestion in and around Melton.
- G. Multiple major developments in this part of Suffolk have had a cumulative impact on the strategic highways network and created an investment need that has not been met by the incremental approach of the statutory planning process. The Sizewell C project is an opportunity to redress some of that balance.
- H. MPC believes that the SZC project should mitigate (in whole or in part) some of the deficiencies of the A12 and A1152, rather than simply making them worse.
- I. A key priority is to keep the A12's traffic free-flowing. This reduces pollution and avoids congestion on the A12's many feeder roads. MPC contends that the A12 must be dualled continuously from Woodbridge to the Friday Street junction with the A1094.
- J. MPC would welcome any mitigation measures to the A1152 in Melton that improve road safety and reduce pollution. Required improvements include: straightening the dog-

legged level crossing at Melton Station; achieving optimal utilisation of the traffic lights at Melton crossroads; any measures that would substantially reduce the number of vehicles, especially HGVs, that transit Melton village.

- K. MPC is surprised and disappointed that EDF has not used this opportunity to address our previously stated concerns about the DCO with regard to: fresh water usage; the installation of new pylons for SZC in an AONB; the widely held view that the community dis-benefits of SZC outweigh the benefits.

### **THE 30-DAY CONSULTATION PERIOD**

1. EDF's latest consultation proposals introduce a large modal shift in the movement of heavy construction materials, from road transport to rail & sea transport. The extent of the increased and overnight train movements through Melton would have a significant impact on our residents. In normal times, MPC would arrange a public consultation meeting to brief residents on the proposals and receive feedback. Such events also encourage residents to make individual responses. MPC contends that the 30-day consultation period is too short to allow adequate public debate in those parishes or towns, like Melton, which bear a greater adverse impact from these new proposals.

### **MELTON BACKGROUND INFORMATION**

2. All of MP's previous responses to EDF at the pre-application stage, together with the council's "Relevant Representation" statement, can be viewed here - [Sizewell C | Melton Parish Council \(melton-suffolk-pc.gov.uk\)](https://www.melton-suffolk-pc.gov.uk)
3. Melton is a large parish, adjacent to Woodbridge and located at the first crossing point over the tidal stretch of the River Deben, at the Wilford Bridge. Melton has a healthy jobs 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. We estimate that population has grown by about 10% in the last 4 years. Many new homes have been built recently, or are planned, along Woods Lane and other stretches of the A1152.
4. A map in **Appendix A** shows Melton's geographical position relative to key transport links, the Deben Peninsula and the various locations for the SZC project. **Appendix B** contains a detailed map of the whole of Melton Parish and is based on its 2016 Neighbourhood Plan, updated to show recent new-builds and planning applications.
5. The Local Plan describes Melton as the 'gateway to the AONB' – an accurate statement, though the less poetic reality is that the Wilford Bridge funnels heavy and growing traffic from all parts of the Deben Peninsula to the A12, and return. The Deben Peninsula is broadly defined as being the large area of land bounded in the south by the River Deben and in the north by the River Alde and includes Bawdsey, Hollesley, Orford, Rendlesham and the Bentwaters Business Park. **In brief, not only does Melton straddle the main north-south routes to Sizewell for road (A12 and A1152), it also does so for rail (East Suffolk line).**

## **OVERVIEW - HOW MELTON IS AFFECTED BY SZC's PROPOSED CHANGES TO THE DCO**

6. In and around Melton Parish, we are experiencing heavy and growing road traffic. The major energy project at SZC, together with the Friston project, would hugely exacerbate the traffic volumes that cut through the middle of Melton village, causing delay to the movement of goods, services and people and creating intolerable conditions for residents. The movement of bulk construction material by train would also pass through Melton, with residents being impacted by train noise and vibration.
7. EDF's latest proposals are to run an extra night train (making a total of 4) and operate trains on Saturdays. EDF is also exploring the potential for a 5<sup>th</sup> train, assumed to run at night. In addition, EDF plans to build an additional, temporary, Beach Landing Facility (BLF) to import more material by sea. If SZC's proposals come to fruition, night-train movements would increase, affecting local residents adversely; and the increase in HGV and other vehicle movements would represent a slightly lower quantum jump than under the DCO proposals. In short, the transport impact of SZC on Melton is huge and all adverse, unless significant mitigation measures are put in place

## **FREIGHT MANAGEMENT STRATEGY**

8. Throughout the SZC planning process, MPC has supported a modal transport strategy for the movement of bulk construction materials that gave priority to sea over rail and rail over road.
9. EDF's latest proposals move significantly in this direction and could reduce the amount carried by road from 60% to 40%.
10. The consultation proposals offer a mix of train and BLF options, giving different outcomes for the reduction in HGV movements. Put simply, if more material is moved by sea or train, less is moved by road. The table below (based on Table 3.4 in EDF's Consultation Document) shows the difference in HGV numbers (2-way movements) between the DCO proposals and the option that uses 4 trains and the larger BLF.

	<u>HGVs Typical Day</u>	<u>HGVs Busiest Day</u>
DCO baseline	325 (650)	500 (1,000)
Four Trains + BLF Options 3 and 4	250 (500)	350 (700)

11. MPC intends to remain consistent with its previously preferred transport strategy for SZC. MPC would support proposals that maximise the reduction of HGV movements on local roads, as summarised below:
  - To run an extra daily train (making 4 extra daily)
  - To run trains on Saturday
  - To run a 5<sup>th</sup> train daily, if it proves to be a feasible
  - The additional, temporary, BLF (Option 4)

but only if EDF implements appropriate mitigation measures, as described in the next section - in particular, measures that avoid the running of overnight freight trains through Melton and Woodbridge and, instead, run them in daytime.

## **RAIL – MITIGATION MEASURES**

### **Line Capacity & Resilience Mitigation**

12. The capacity and resilience of the East Suffolk line must be improved. EDF's plan to run trains during the hours of sleep (at peak, up to 5 extra trains per night i.e. up to 9 two-way train movements) through Melton and Woodbridge, from 2023 to 2034, is totally unreasonable. The East Suffolk line's capacity must be increased so that the proposed extra trains can run in day-time.
13. A capacity increase on the East Suffolk line is also essential to guarantee resilience. If there is to be a major increase in train movements on the East Suffolk line, EDF needs a robust contingency plan for dealing with a major breakdown, accident or other incident. MPC doubts that the current, limited, capacity of the East Suffolk line would permit EDF to provide assurance that, in the event of a freight-train incident, no disruption would ensue to day-time rail schedules, nor to those who depend on train travel for their livelihood.
14. At the Stage 3 SZC consultation, EDF proposed to build a passing loop between Melton and Wickham Market. At the time, MPC suggested that for little extra cost, "double-tracking" could be put in place between Melton and Saxmundham. MPC (supported by Woodbridge Town Council) urges EDF to revisit this double-tracking proposal. The East Suffolk line would then have the capacity and resilience to permit safe operation of the proposed extra trains in day-time, eliminating the threat of overnight train disturbance for Melton and Woodbridge residents and providing a significant and, much needed, beneficial infrastructure legacy.

### **Melton Level Crossing Mitigation**

15. Melton is particularly disadvantaged by having a level crossing of one of the worst designs imaginable. The A1152 takes a dog-leg turn at its meeting point with the railway. This forces HGVs and large Agricultural Vehicles to cross to the opposite side of the road in order to navigate the bend, halting traffic flow and increasing congestion on an already congested road (see image below). The resultant standing traffic causes increased pollution. The Melton level crossing needs to be updated and straightened out – this requirement is also mentioned in the later section on suggested mitigation measures for roads. *Note:* At the time of writing, the surfaced area next to the level crossing is full of shipping containers, stacked 3-high, and its access to the A1152 is on the bend in the road, adding to local traffic problems.



### **Noise & Vibration Mitigation**

16. There is an urgent need to mitigate the noise and vibration from:

- the proposed 4 to 5 overnight-trains passing through Melton
- any improvement work to the railway line.

### ***With regard to overnight trains passing through Melton -***

17. Throughout the SZC pre-application consultation process, MPC has been consistent in recommending that EDF should upgrade the East Suffolk line significantly. If done, this would enable EDF to run its freight trains in day-time rather than overnight.

18. Unfortunately, EDF's current proposal is to not upgrade the East Suffolk line to this standard. Instead, EDF's proposal is to run overnight freight trains through Melton and Woodbridge, possibly for 6 days per week, for 11 years (from 2023 to 2034). Each train would be about ¼ kilometre long, typically made up a Class 66 locomotive and 20 wagons carrying 1,250 tonnes of construction material. Through the peak years, 2024 to 2028, EDF would run between 7 and 9 train movements every night, Monday to Saturday, for 5 years. The overnight trains would travel through Melton and Woodbridge at 10mph; then be held at the Leiston branch line until morning, when they would be delivered to site.

19. EDF has already acknowledged the disruption that overnight train movements would cause to Leiston's residents and has guaranteed that trains will not run through the town from 11pm to 7am. Indeed, EDF is to invest in building a temporary "green route" rail line to take trains directly from Saxmundham to the SZC site, bypassing Leiston. The combined population of Melton and Woodbridge is twice that of Leiston's. It is our contention that the case for avoiding overnight freight train operations through Melton and Woodbridge is as strong as that for Leiston. Our residents deserve the same protection. EDF should guarantee no freight trains through Melton and Woodbridge between 23:00 and 07:00, as it has done for Leiston. The efficient and fair solution would be for EDF to invest in a permanent upgrade to the East Suffolk line (especially the single-track stretch between

Melton and Saxmundham) to enable the extra freight trains to travel in daytime. **This proposal is also supported by Woodbridge Town Council.**

20. The unreasonably short consultation period will deny many residents the opportunity to become aware of and comment on EDF's plans for overnight train operations through Melton and Woodbridge. Many will only become aware of the issues when this document is published shortly before being approved by MPC on 16/12/2020 – by which time the deadline for responses would have nearly passed. The likely low number of consultation responses from residents in Melton and Woodbridge should not be interpreted by EDF as indifference or acquiescence to its rail strategy. There are some residents living near to the railway line who are aware of the plans for overnight trains. A small number have made their views very clear to MPC and the unambiguous message is that they do not want overnight trains through Melton and Woodbridge – see **Appendix C**. If Melton residents have to endure extra trains, they want them to run in daytime.
21. Noise and vibration disruption take several forms. Firstly, there is the alarm noise from barrier crossings. For any amount of overnight train operation, EDF must find a solution to the alarm noise from closed barriers at the A1152, Dock Lane and other level crossings in Melton, together with similar level crossings in Woodbridge, all in residential areas.
22. EDF's technical assessment of barrier alarm noise at level crossings was based on crossings on the Saxmundham to Leiston Branch Line. EDF's view is that, at night, properties that were not directly adjacent to the crossing alarms were unlikely to be significantly affected by them. Our view is that most of the crossings assessed by EDF are in virtually open countryside and quite untypical of the level crossings in Melton and Woodbridge. Those assessments may, therefore, be of questionable relevance. EDF assessed at least one level crossing in Leiston and this was probably more typical of the crossings in Melton and Woodbridge. There is, therefore, a striking inconsistency of policy in that EDF has promised no overnight train operations in Leiston but proposing to operate up to 9 overnight trains through Melton and Woodbridge. We also question whether EDF's view of barrier alarm noise would match the real-world experience of a large cluster residents living near the line.
23. **Melton residents tell us that** the barrier alarm warnings are loud and particularly penetrating at night. To quote an e-mailed comment on 2/12/2020 from a Melton resident (who also happens to be a parish councillor) living 400 metres from the A1152 barrier crossing: *"The noise does carry from Melton Station all the way to our cottage most days, so you can see the distance the sound can carry and the potential for disturbed sleep. It's like a car alarm going off and sounds like a police car! Nee nah nee nah! Very unpleasant but necessary for safety reasons."* This highlights the key point - residents will accept barrier alarms in day-time hours. Residents will not accept barrier crossing alarms of up to nine times per night, disrupting their sleep for long periods as the trains pass slowly through Melton and Woodbridge, for years on end. This would be totally unacceptable. It requires EDF and Network Rail to either eliminate the problem (preferably, by running trains only in daytime) or apply substantial mitigation.
24. Secondly, on the general issue of noise and vibration, MPC takes assurance from the fact that EDF is working in consultation with ESC and SCC on a Rail Noise Mitigation Strategy and a Noise Mitigation Scheme to further develop the mitigation proposals for the project. MPC's view on the noise mitigation strategy and scheme is that:

- it must protect all households that are affected adversely by rail noise & vibration
  - there should be clear and fair eligibility criteria to identify those households that qualify for sound insulation
  - the terms of the scheme should be communicated directly to all households in Melton that are adjacent to the railway line.
25. Anecdotal evidence from Melton residents living within hearing distance of the railway line indicates that their real-life experience of train noise and vibration is far more profound and intrusive than EDF's interpretation of the technical measurements recorded for its Environmental Statement and more recent studies. MPC, therefore, wants EDF's measurements of rail noise and vibration to be subject to independent scrutiny by SCC's and ESC's technical experts.
26. MPC is aware that EDF's Noise Mitigation Scheme is expected to include use of long-welded track, the ideal locations of welded rail joints, the use of under-ballast mats, or equivalent, speed restrictions on train movements in built up and sensitive areas, and preferences for particular locomotive types. MPC's view is that any overnight train should use the quietest modern locomotives available, certainly none noisier than a Class 66 locomotive (fitted with sound attenuation equipment) should be used. Again, MPC expects the Noise Mitigation Scheme work programme to be developed in consultation with ESC and SCC.

***With regard to any rail improvement work –***

27. MPC would want assurance that:
- if rail improvement work has to be done at night, Network Rail should avoid undue disturbance to the population by banning work between midnight and 6am in residential areas.
  - during any upgrade work, impacts on passenger services, vital for Melton people commuting to Ipswich and beyond, are minimised.

## **ROAD – MITIGATION MEASURES**

### **SZC Will Exacerbate Existing Traffic Problems Unless There Are Mitigation Measures**

28. Paragraphs 29 to 39 provide detail relating to MPC's concerns with regards the impact of the SZC proposal on the A12 and A1152 and how these impacts should be further mitigated. This detail is consistent with information provided to EDF at previous stages.
29. Even if SZC's plan to reduce HGV movements is realised in full, the project's significant extra HGV movements (in any of the scenarios presented in the proposed changes to the DCO application) would exacerbate the already unacceptable traffic congestion in and around Melton.



30. The SZC and Friston energy projects will each generate a quantum leap in traffic on the A12 and A1152. To this, should be added the extra HGV traffic from the possible increased use of Bentwaters Business Park for off-site support offices, stores etc.
31. MPC is extremely worried that a further increase in traffic congestion through the middle of Melton village would make life intolerable for its primary school children and residents. It would also be bad for business and hinder the efficient transport of goods, services and people.
32. There is widespread local concern that the SZC and Friston energy projects will also lead to an explosion of rat-running, when drivers choose to avoid using the A12 or the Southern P&R site. Vehicles seeking alternative north-south routes will use rat-runs through Martlesham, Woodbridge and Melton that converge in the middle of Melton village and follow the A1152 over the Wilford Bridge and on to Rendlesham, Bentwaters, Tunstall, Snape, Leiston, Sizewell & Friston.

### **Cumulative Impact of Major Developments**

33. The traffic impact of the two major Energy Projects brings into focus the concerns of MPC and others that multiple major developments in this part of Suffolk have had a cumulative impact on the strategic highways network and created an investment need that has not been met by the incremental approach of the statutory planning process. This planning application is an opportunity to redress some of that balance.

### **Contingency Planning**

34. The A12 is already vulnerable in the event of major breakdowns, accidents, Orwell Bridge closure, adverse weather, the Latitude Festival or other incidents. EDF must develop a robust contingency plan for dealing with such impediments to the flow of its HGV traffic. MPC wants assurance from EDF that HGV traffic would not be routed through Melton to Sizewell at times of congestion on the A12.

### **Suggested Road Mitigations**

35. MPC believes that the SZC project should mitigate (in whole or in part) some of the deficiencies of the A12 and A1152, rather than simply making them worse.

### ***The A12***

36. A key priority is to keep the A12's traffic free-flowing. This reduces pollution and avoids congestion on the A12's many feeder roads. MPC contends that the A12 must be dualled continuously from Woodbridge to the Friday Street junction with the A1094. MPC therefore supports:
- dualling the single-carriage stretch of the A12 between the Seckford Hall turn-off and the Grundisburgh Road roundabout;
  - dualling the single carriage stretch of the A12 between the Woods Lane roundabout and the Ufford Road turn-off;





- Most importantly, MPC wishes to work with any relevant authority, to identify options that could substantially reduce the number of vehicles, especially HGVs, that transit Melton village.

## **SOUTHERN PARK AND RIDE**

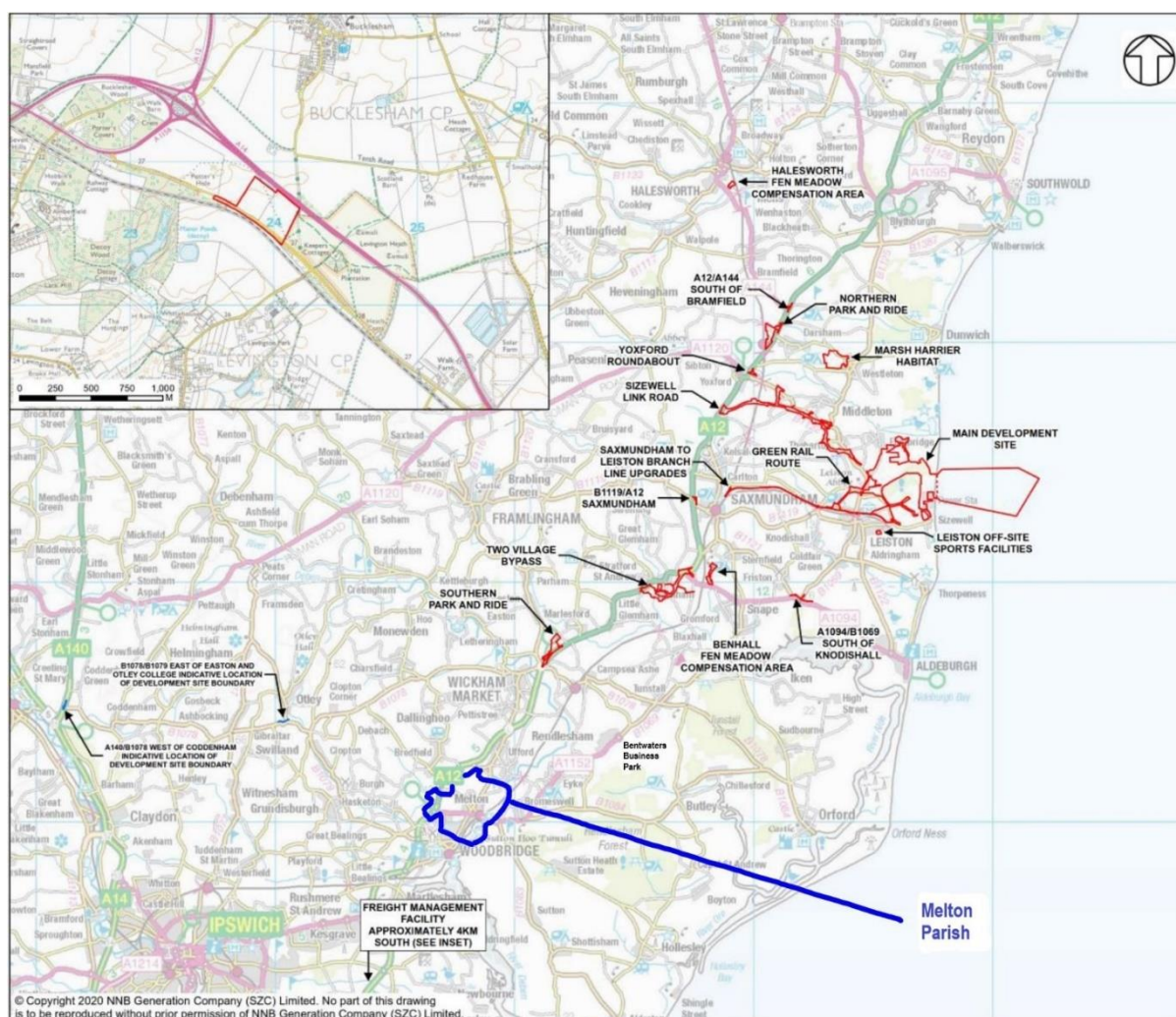
40. MPC notes the proposed changes to the DCO and re-affirms its previously stated view that the Stage 2 consultation option for the Park n' Ride to be located adjacent to the Woods Lane (A1152) roundabout with the A12 must remain off the table.

## **OTHER PROPOSALS**

41. MPC has no comments to make on the proposals for: SSSI Crossing; Fen Meadow Replacement; Water Resource Storage Area; Surface Water; Other Main Site Changes; Sizewell B Relocated Facilities; Associated Development Changes.
42. MPC is surprised and disappointed that EDF has not used this opportunity to address our (and other's) previously stated concerns about the DCO:
  - ***Fresh water usage*** - SZC will need 2-3m litres of fresh water daily, from an area of low rainfall where the frequency and severity of drought will worsen with climate change. We are concerned this will impact adversely on agricultural and domestic supplies and cause ecological problems in the region.
  - ***The installation of new pylons for SZC in an AONB*** - this invasive approach was avoided in the 1980s for SZB, as it should be in the 21st century for SZC. We suspect this is a cost saving measure, not an unsolvable technical problem - and it should be reversed.
  - ***Our view that the community dis-benefits of SZC outweigh the benefits.*** - this is consistent with MPC's view following our consultation event in March 2019 with Melton residents. The community will incur severe dis-benefits to transport, the environment and pollution, tourism, accommodation and community safety. While the economic benefits to the supply chain and jobs are welcome, in the latter case they fall short of expectations. For new jobs, only a small proportion of the higher graded, senior, posts will go to local people.

## APPENDIX A

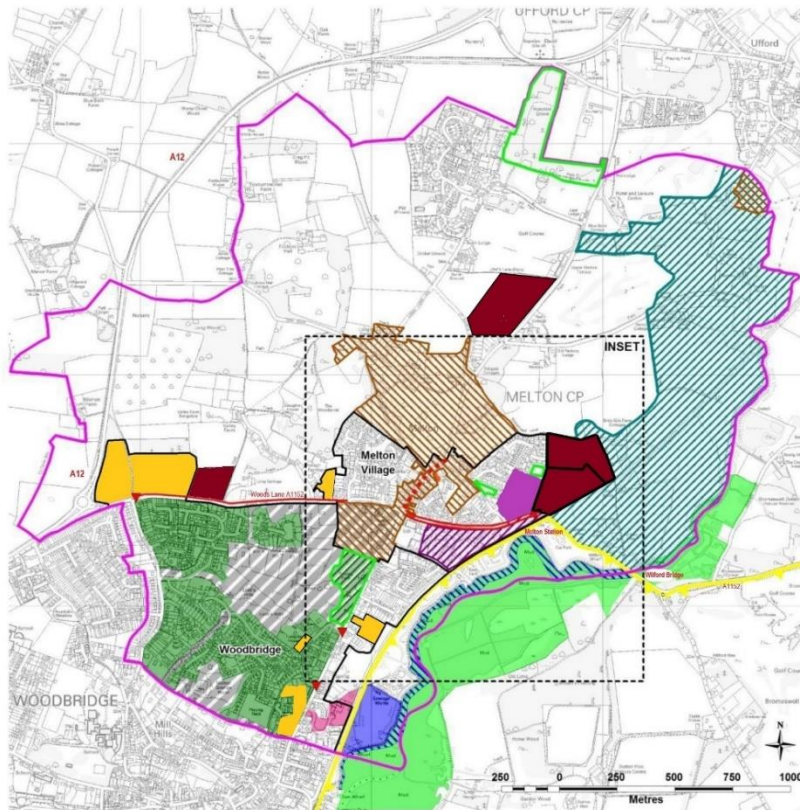
**Map showing the position of Melton Parish relative to key transport links, the Deben Peninsula and the various build-locations of the proposed SZC project** *[Reproduced by kind permission of EDF].*





**KEY**

- Neighbourhood Plan boundary
- MEL1 - Physical Limits Boundaries
- MEL 2 - Provision for cyclists and pedestrians:**
  - ▼ Pedestrian / Cycle Crossing Point
  - \*\*\*\*\* Traffic Calming / Dedicated Cycle Access
  - Footpath / Cyclepath Provision
- MEL3 - Area of Outstanding Natural Beauty
- MEL7 - Land opposite McColls Convenience Store, The Street
- MEL9 - Improvement to Community Facilities
- MEL11 - Special Landscape Areas
- MEL12 - Local Green Space
- MEL13 - Protection of Trees and Rural Character
- MEL14 - Retention of Riverside Qualities
- MEL15 - Residential Boats
- MEL16 - Melton Conservation Area
- MEL17 - Areas to be Protected from Development
- MEL19 - General Employment Areas
- MEL20 - Deben Mill
- MEL21 - Land off Wilford Bridge Road
- Deben Estuary Special Protection Area (Natura 2000)
- Housing built recently
- Commercial Premises built recently
- Planning Permission applied for recently



## APPENDIX C

### COMMENTS FROM MELTON RESIDENTS

The common thread running through public responses to-date is that none want any overnight trains running through Melton and Woodbridge.

One Melton resident, a former railway engineer, emailed a parish councillor on 9/12/2020 suggesting that the proposed overnight trains could actually be run in daytime:

*“The Class 66 is an American industrial design from the 90s and first came to the UK in 2000. Freight companies also use class 37 built from 1960 as English Electric Type 3's and Class 47s which date back to 1963. As the Class 37s would work in pairs they are extremely noisy as is currently apparent with the leaf clearance trains at night.*

*Restrictions should therefore apply to which locomotives may be used on the Sizewell freight contract. I would suggest none noisier than a Class 66 should be allowed and the class 66's should be fitted with sound attenuation equipment if practicable.*

*There is a general capacity problem with freight trains to and from Felixstowe already and Sizewell will obviously exacerbate the problem. There is however no reason why freight trains could not be held at Ipswich rather than Leiston to allow daytime working over the East Suffolk line.*

*Does the East Suffolk line passenger density justify an hourly service during the day? A 1½ hourly service would allow freight trains to run without double tracking.*

*Automatic crossing on minor roads such as Dock Lane should default to being in the down position at night, with a phone request to raise the barrier when necessary. This would reduce the number of audible warnings required and thus sleep disturbance.*

*Given EDF's nuclear projects in France and at Hinkley Point are way behind programme and substantially over budget, the 11-year window is over optimistic.”*

Another Melton resident emailed a parish councillor on 9/12/2020 confirming the exceptional traffic growth in traffic in recent years and expressing a preference for EDF's freight trains to be run during the daytime rather than overnight:

*“to be honest this whole thing fills me with deep depression. The area simply isn't equipped for the level of traffic on the roads or rail. Even since we arrived 4 years ago, we have noticed a huge increase on the road. Melton crossroads is rarely empty and usually has a long queue in at least one direction.*

*X has sent you the professional comments, mine can only be from my gut!*

*I am already woken by the line cleaning train in the night, and whilst I actually love our little local train, and miss it when it isn't running, that is because it is only twice an hour. I think I would feel very differently with the increase, though would prefer more in the day if it means less at night.*

*I completely agree that sea is the way to go, but know that from the start they have said thos would not happen. I despair of the extra footfall and traffic in the area during the building, and obviously feel this is completely the wrong place to build it, as I love that beach. We were there the other day, and I will whatsapp you a photo of a house along the cliff from there...their picnic area literally now hanging over the beach*

*Sorry, not very helpful. Just don't want it!!!"*