

MELTON PARISH COUNCIL

Unique Reference: 20025880

The Sizewell C Project Ref: EN010012

This is Melton Parish Council's written feedback on the virtual Preliminary Meeting Part 1 (23rd and 24th March), to be submitted by **Procedural Deadline B, Wednesday 7 April 2021**

Glossary of Acronyms

MPC	Melton Parish Council
ExA	Examining Authority
I/API	Initial Assessment of Principal Issues
PI	Principal Issue
PM	Preliminary Meeting
SZC	Sizewell C
EDF	The Applicant
DCO	Development Consent Order
SOCG	Statement of Common Ground
CoESL	Communities on the East Suffolk Line, Woodbridge to Saxmundham inclusive

Request to be heard orally at Preliminary Meeting Part 2

1. Melton Parish Council (MPC) requests to be heard orally at Preliminary Meeting Part 2 to make the case for a Principal Issue (PI) to assess the impact of EDF's proposed rail freight strategy on Melton and other communities on the East Suffolk Line, Woodbridge to Saxmundham inclusive (CoESL),. MPC will require a log-in for Councillor Bill Banks at email address: cllr.banks@melton-suffolk-pc.gov.uk

The Examination Process

2. MPC supports the proposal by Aldeburgh Town Council, at the Preliminary Meeting (PM) Part 1, that Parish and Town Councils should have the opportunity to prepare a Statement of Common Ground (SOCG).
3. MPC supports the view that the Examining Authority (ExA) should decide on the Applicant's (EDF's) change requests before making final decisions on both the Principal Issues (PIs) for examination and the Examination Timetable. As EDF's change proposal for multiple overnight rail freight movements is highly detrimental to Melton and all other CoESL, MPC

believes that an ExA decision on the changes is an essential prerequisite to it making informed and final decisions on the PIs.

4. MPC believes that a democratic deficit was opened-up on EDF's planning application when its highly significant proposals to change the DCO were rushed through an inadequate consultation period (30 days). This did not allow for effective engagement with residents on matters that affect them adversely. The situation was made worse by EDF's refusal to reconvene the Community Forum, in any form, as a way of communicating/consulting on its proposals with local interest groups.
5. Future factors that could further hinder public and official engagement during the Examination in Public are:
 - a. the forthcoming local elections and the related period of purdah;
 - b. COVID restrictions generally;
 - c. holding ExA virtual meetings within a community that enjoys, at best, a patchy broadband service; the evidence of which was all too clear on both days of the PM Part 1 meeting.
6. MPC accepts that virtual meetings have a role in this process but requests that a way be found for some hearings to take place in person.
7. MPC also requests that the Examination period be extended to avoid clashing with the local elections/purdah.

Comments on Initial Assessment of Principal Issues (IAP)

8. MPC wishes to provide two contextual points in advance of its comments on the IAP:
 - a. MPC's Relevant Representation (and those of some other respondents) would be rendered obsolete by EDF's change proposals, if approved. This is significant because ExA's choice of PIs is informed by the Relevant Representations. MPC's suggestions (below) on the PIs assume that EDF's proposed changes will be approved in whole, or part.
 - b. Melton is affected greatly by the transport strategy for SZC because key roads to Sizewell, the A12 and the A1152 (the latter joins-up a rural road network connecting the whole of the Deben Peninsula, including Bentwaters Business Park, to the A12) plus the railway to Sizewell (East Suffolk line), all transit Melton Parish.

PI - Traffic and Transport

9. MPC considers that this PI should include an assessment of the impact on **rural roads** of SZC and linked developments (such as the Bentwaters Business Park).
10. MPC supports Suffolk County Council's suggestion for a PI to assess the "Deliverability" of EDF's proposed freight strategy, as well as its "Acceptability".
11. MPC asks that any ExA assessment of "Deliverability" should examine the viability of EDF's rail freight strategy within the currently planned line capacity and, if the latter is found to be inadequate, should also identify what line capacity upgrades would be required in order to meet the test of "Acceptability".
12. MPC suggests that the PI to assess the "Acceptability" of EDF's rail freight proposals should have particular regard to the adverse impact on residents of multiple train movements through CoESL during the hours of sleep.
*[NOTE - EDF's proposal is to run overnight freight trains through Melton, Woodbridge and Saxmundham, possibly for 6 days per week, for 11 years (from 2023 to 2033). Each train would be about 1/3 kilometre long, typically made up a Class 66 locomotive and 20 wagons carrying 1,250 tonnes of construction material. **Through the 5 peak years of construction, 2024 to 2028, EDF could be running 8 train movements every night.** .MPC's view is that if EDF's rail freight operations are to go ahead in any form, these trains should run only in daytime on an upgraded East Suffolk line and not between the hours of 23:00 and 07:00.]*

PI - Noise and Vibration

13. MPC suggests that there should be a specific PI to evaluate the impact on CoESL of overnight train noise and vibration associated with EDF's rail freight proposals.
[NOTE - Noise and vibration disruption take several forms and includes barrier alarm noise at level crossings, of which there are several in Melton and Woodbridge. Melton residents living within hearing distance of the railway line have said 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.]

PI – Potable/non-potable water supply

14. MPC supports the proposal to give this greater prominence in the list of PIs.

PI – Financial Viability

15. MPC supports the suggestion that there should be a PI workstream to evaluate the whole-life financial business case for SZC (“whole-life” being the period of time spanning construction, operation and de-commissioning).

The Applicant’s proposed changes to the application

16. MPC has noted EDF’s contention that the proposed changes are not “material” to the extent that they would not change in substance that which was applied for originally.
17. Regardless of the above, MPC’s view is that the proposed changes are, in fact, significant and highly “material” because of their adverse impact on Melton people and other CoESL. MPC suggests, therefore, that EDF’s proposed changes warrant further public scrutiny and that ExA’s decisions on them should be made prior to the start of the 6-month Examination stage.