

Title: Sizewell C Proposed Nuclear Development

Stage 4 Pre-Application Consultation

Response from Campsea Ashe Parish Council

(16 September 2019)

Campsea Ashe Parish Council has formed this response (based on the Consultation Documents) through councillors attendance at various events during the consultation period, meetings with other local parish councils, responses received by residents and during public participation within several parish council meetings. The response was adopted by The Council on September 16 2019.

Introduction

I.01 Campsea Ashe is a village in East Suffolk, south-west of the proposed development at Sizewell but within a mile of the proposed park and ride at Hacheston. It is predominantly rural with the village separated by the railway and bridge. The bridge is located on the B1078 which crosses the A12 at Lower Hacheston passes through the village, with three sharp bends, towards Tunstall and then joins the B1084 to Orford. This and other unclassified roads in the village have become busier in recent years due to traffic, from both residential and business development to the east, especially the Bentwaters Industrial Estate, accessing the A12.

I.02 There is approximately 150 houses (some listed) in the village and a population of about 430. The East Suffolk railway line runs through the village and the trains that travel to Ipswich in the south and Lowestoft in the north stop at the station, which is called 'Wickham Market'.

Approximately 70 homes are located within 300 yards of the railway line.

I.03 The area is considered an Environmentally Sensitive Area with many archaeological finds supporting this claim.

SUMMARY

- O.01 Campsea Ashe Parish Council (CAPC) continues to agree with the JLAG view regarding the lack of detail in EDF's Stage 3&4 Sizewell C Consultation and that it still is difficult at present to see how the project's benefits outweigh its disadvantages.
- O.02 The project is recognised as being of national importance and Campsea Ashe Parish Council strongly believes, there is insufficient recognition of the social, structural & environmental impacts on East Suffolk, when set against the benefits to the country as a whole.
- O.03 We are concerned regarding the lack of co-ordination between the various parties (Government/Network Rail & EDF/ Scottish Power & enterprises) involved in infrastructure projects within the region. This is potentially an opportunity to develop future proof low carbon infrastructure for the East Anglian coastal area. The cumulative impact of other projects proposed for the area, including Scottish Power Renewables' plans for a large substation in Friston, will further intensify the environmental concerns. It is essential that the East Suffolk area is fully compensated for its loss of amenity during the construction phase of Sizewell C.
- O.04 CAPC is disappointed with the lack of response regarding our previous submission at stage 3. The main concern of Campsea Ashe Parish Council remains the impact of increased road traffic, particularly HGVs & LGV's through the village during the construction phase. The possible impact on Campsea Ashe and surrounding parishes is still not covered in the consultation, as outlined in our previous document, as well as the potential use of the Bentwaters Base complex and its potential impact on the area.
- O.05 Campsea Ashe Parish Council favours a rail-led option for movement of materials and are disappointed that the marine-led option has been abandoned. It is essential that the rail-led option remains, in order to reduce the volume of HGV traffic to mitigate the adverse environmental impact. We are especially concerned about the impact on residents of night movements by rail as proposed in the rail/road option, as a majority of residents live close to the railway line. National Policy Statements argue rail transport has a crucial role to play in delivering significant reductions in pollution and congestion and we would argue for an enlargement of capacity (2 lines/more sidings) of the East Anglia line between Ipswich and Lowestoft, which would have multiple future benefits.
- O.06 Campsea Ashe Parish Council supports a southern park and ride but still believes there has been insufficient investigation into a location further south. The re-worked option at Hacheston will still have a major negative road traffic impact not only on Wickham Market but all neighbouring parishes with regards to volume/capacity and pollution. Light pollution from the installation as well as (the lack of adequate) screening options remain a concern. We feel that the proposed P&R changes are not satisfactory. Infrastructure for walking and cycling to the park and ride are still lacking.

Main Proposals

1. Sizewell C proposals

- 1.01 Campsea Ashe Parish Council (CAPC) does recognise that the proposals address issues relate to a nationally important, strategic project on the basis of the need for a low carbon power generation. However, CAPC is not convinced that nuclear power and its inherent issues of high carbon construction and high carbon decommissioning is the correct path for the future.
- 1.02 The Parish Council also understand the principle of the need for new low carbon power generation and choice of Sizewell as a suitable site has been agreed by parliament and is set out in the NPS. However, CAPC is concerned regarding the validity of the NPS in todays environment.
- 1.03 The Parish Council is still concerned with the lack of detail contained in the consultation document regarding the impact on Campsea Ashe, which is continuing to make it difficult to comment constructively on matters directly affecting the parish.

2. Main development site

- 2.01 Campsea Ashe Parish Council again recognises that comments made about the main development site are best left to those who reside in the immediate area but make the following general point.
- 2.02 However, we still maintain that the main development site intrudes heavily on both the Suffolk Coasts and Heath Area of Outstanding Natural Beauty and the Suffolk Heritage Coast which is likely to have an adverse impact on tourism in the area.

3. Sizewell C pylon options

- 3.01 Campsea Ashe Parish Council recognises that comments made about the pylon options are best left to those who reside in the immediate area.
- 3.02 However, we do feel that pylons have an overall negative impact in an AONB and we are disappointed that options of underground cabling have not been addressed at all.

4. Freight management facility

- 4.01 We are concerned that a reliance on road transport will create major issues on the A12 between the A14 junction and the Woodbridge A12 Woods Lane round-about, which might have further negative traffic implications for Campsea Ashe. Any further congestions in the Woods Lane area will, as previously experienced, create traffic issues on the B1078 as a short cut route linked to the Rendlesham/Bentwaters route. The potential cumulative impact / combination effect of other development proposals in the area have not been taken into consideration.
- 4.02 Campsea Ashe Parish Council recognises that comments made about the actual freight management facility options are best left to those who reside in the immediate area.
- 4.03 We refer to previous detailed comments made in **Reference Appendix point 10**

5. Transport: movement of freight

- 5.01 CAPC is disappointed with the lack of a fully integrated rail strategy for the region. We regard this as a failure of government and associated bodies. We support a rail led strategy due to the insufficient road infrastructure in the region and the potential impact increased road usage would have in rural / coastal Suffolk. We regard an expansion of the East Anglia line as essential to alleviate pressures on insufficient local roads and potentially creating a futureproof low carbon transport artery for the whole of the region.

5.01.1 A large proportion of Campsea Ashe is located alongside or within 300 yards of the railway line and is therefore subjected to vibration and noise/air pollution linked to the increased usage of the railways. We therefore object to an increase of usage of the railway line during night time and regard an expansion of the line as crucial.

Comments made in Stage 3 Consultation **Appendix 6.1-18 remain unchanged**

- 5.02 CAPC wholly rejects a road led strategy, as outlined in our Stage 3 response

Comments made in Stage 3 Consultation **Appendix 6.1-18 remain unchanged**

- 5.03 The integrated approach would be supported by CAPC, if

5.03.01 EDF can demonstrate that the increase of traffic will not have an adverse impact on the roads within the parish or that such impacts are mitigated by restrictions and improvements **and if**

5.03.02 train movements during night time are restricted, as it impacts on large part of our community living alongside or within 300yrds of the railway line. Currently the proposed 5 movements per night (0 at day time) in the combined proposal are not acceptable to the residents along the railway lines.

- 5.04 Please refer here especially to **Appendix 6.02-6.04**

- 5.05 CAPC is very concerned about the potential use of the industrial estate at Bentwaters / Base Park during the construction phase. This has not been featured or been addressed as a potential major traffic issue affecting Campsea Ashe and all the neighbouring PC's, either with the B1078 being used as a route to the P&R in Hacheston/Wickham Market or the B1069 through Tunstall/Snape to Leiston. Again, we are concerned re the cumulative impact of Sizewell and the renewable sub-station proposal Friston will have on the area.
- 5.06 We refer to previous detailed comments made in **Appendix 6 relating to stage 3 consultation**

6. Transport: Sizewell link road and Theberton bypass

- 6.01 Campsea Ashe Parish Council recognises that comments made about the link road and the Theberton bypass are best left to those who reside in the immediate area.

7. Road Improvements

- 7.01 Campsea Ashe PC is highly concerned that it has not received any parish specific responses, feedback or proposals linked to our previously expressed concerns regarding road issues in the parish.

- 7.02 A12 two village bypass

We support in principle a feasible solution to bypass those villages but CAPC recognises that comments made about the issue are best left to those who reside in the immediate area.

7.02.01 We refer to previous detailed comments made in **APPENDIX 11.10**

- 7.03 A12/B1122 Yoxford roundabout

We support in principle a feasible solution but CAPC recognises that comments made about the issue are best left to those who reside in the immediate area

- 7.04 Theberton by-pass

CAPC recognises that comments made about the issue are best left to those who reside in the immediate area.

8. Sizewell Halt or rail siding or spur at LEEIE

- 8.01 CAPC recognises that comments made about the issue are best left to those who reside in the immediate area.

9. Park & Ride

- 9.01 CAPC is still highly concerned regarding the impact this will have on the parish with regards to volume of traffic subsequently using the B1078 through Campsea Ashe and the associated pollution (air/noise/light).
- 9.02 We do not think the proposals for alleviating traffic in / around Wickham Market and the slight changes to the actual facility are feasible with regards to the existing road infra - structure and will have an huge impact on the residents with regards to inconvenience, speeding, noise & air pollution as well as having adverse impact on (partially listed) housing stock along the roads.
- 9.03 CAPC is very concerned about the potential use of the industrial estate at Bentwaters / Base Park during the construction phase. This has not been featured or been addressed as a potential major traffic issue affecting Campsea Ashe and the neighbouring PC's, either with the B1078 being used as a route to the P&R in Hacheston/Wickham Market or the B1069 through Tunstall/Snape to Leiston. Again, we are concerned re the cumulative impact of Sizewell and the renewable sub-station proposal Friston will have on the area.
- 9.04 CAPC recognises that further detailed comments made about the issue are best left to those who reside in the immediate area
- 9.05 We refer to previous detailed comments made in **Appendix points 11.01-10 & 12.01-04**

10. Consultation Process

- 10.1 CAPC is disappointed by the lack of meaningful engagement by EDF to issues raised in previous consultations, especially a lack of environmental impact studies which would allow a more informed response to the issues posed.

Reference Appendix point 13

APPENDIX

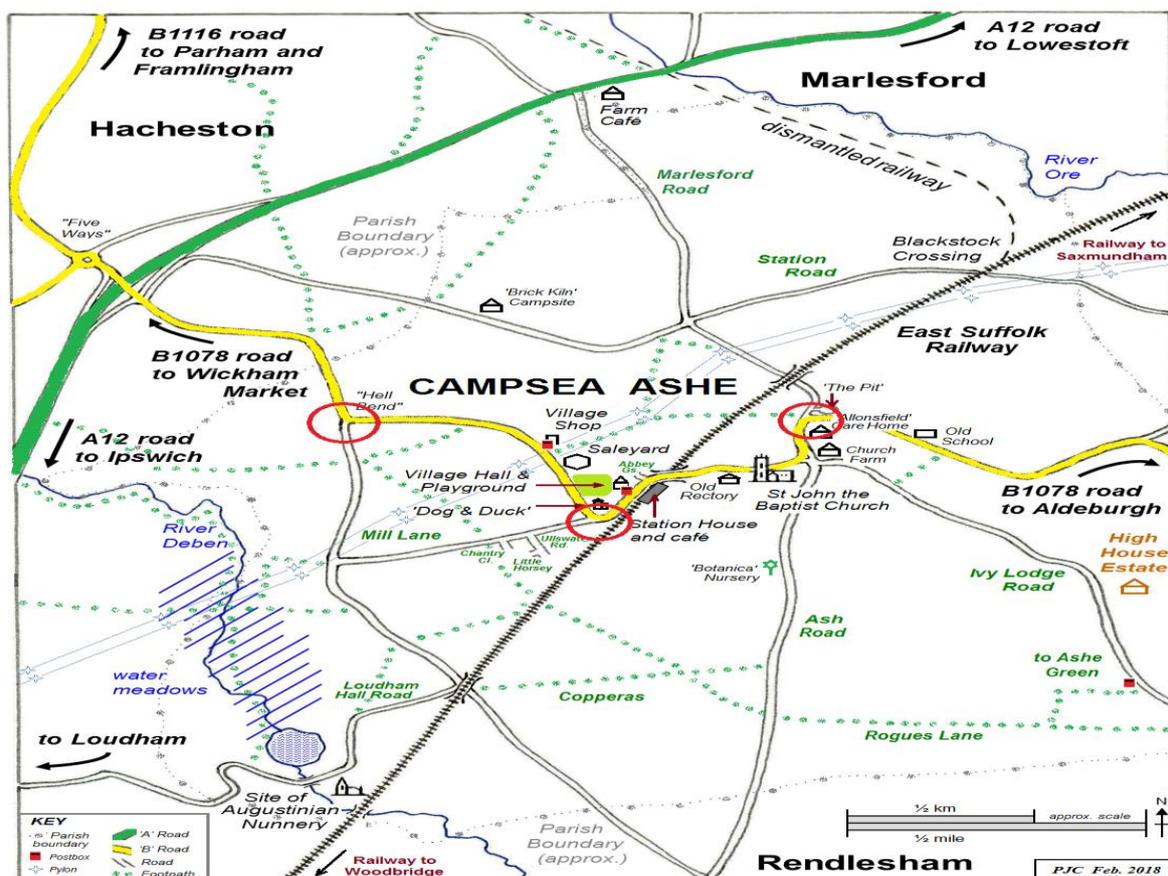


Fig 1 Map illustrating the current traffic hot spots in the Parish

6. Transport: movement of materials

- 6.01 Campsea Ashe Parish Council together with other parish councils and JLAG are disappointed regarding the abandonment of the marine-led option. This was the previously favoured option as would it reduce the impact of increased traffic on an environmentally sensitive area and the surrounding landscape. There is concern that the wording in the consultation document suggests difficulties with the delivery of the rail-led option. Some residents also have concerns about the level of independence provided in the Network Rail Report on the rail-led option.
- 6.02 On balance there is preference for the rail-led option as this has the potential for reducing the number of HGVs passing through the village compared with the road-led strategy. Campsea Ashe has suffered the impact of increased HGV traffic in recent years due to developments at Bentwaters and Base Park in Rendlesham, using the B1078 and other unclassified roads in the village (see 6.07-6.13). However a number of residents live in properties immediately adjacent to the west of the railway track and these would suffer increased noise and vibration as a result of the rail proposals. This would apply to both rail

and road-led strategies although only the latter would involve night movements of rail freight.

- 6.03 Campsea Ashe Parish Council support the proposals that now plan the passing loop for the rail-led strategy to the south of the village; a recognition of the issues raised from the previous location at Wickham Market station in an earlier consultation. The passing loop will provide a legacy of potential increased capacity of the East Suffolk Line in the future. However this benefit would be more positive if the line were double track from Saxmundham to Woodbridge. Reducing the amount of passenger and freight movement by road through an improved rail infrastructure would reduce the impact of air pollution, noise etc. which are exacerbated by road congestion. This would help achieve objectives mentioned in planning documents for housing developments in towns and villages in close proximity to the East Suffolk Line i.e. to reduce the adverse impact on local road infrastructure.
- 6.04 As both rail and road-led strategies increase the amount of rail movements there needs to be mitigation to reduce noise and vibration for properties adjacent to the rail track. Some form of screening or other noise abatement to reduce the impact would be beneficial.
- 6.05 Campsea Ashe Parish Council is primarily concerned with the increased road traffic movements; particularly of HGVs passing through the village as a result of the development at Sizewell both during construction and operation. This applies to both the rail-led and road-led strategies although the latter would have a greater adverse impact.
- 6.06 The Consultation Document does not provide road traffic mapping for Campsea Ashe. However EDF representatives attended a parish council meeting and stated estimations of an increase in road traffic movements on the B1078 through Campsea Ashe from 1650 per day in 2015 to 2550 per day at peak usage in 2027. They also added that only 100 movements per day would be directly linked to Sizewell and this would not include HGVs. This was considered too low a number to be included in the Consultation Documents.
- 6.07 Traffic surveys completed by local residents discovered that between 80% and 90% of HGV traffic through the village had either their start or destination point at Bentwaters or Base Park in Rendlesham.
- 6.08 Campsea Ashe Parish Council accepts that there will be movements of agriculture vehicles for agricultural purposes through the village. However the cumulative impact of residential and industrial developments at Rendlesham, Sizewell C, plus other proposed energy developments (including Scottish Power at Friston) and the potential use of sites on Base and Bentwaters Parks for Sizewell related issues (e.g. storage facilities) will increase traffic and cause a significant adverse impact on people, property, landscape and result in an increase in pollutants.
- 6.09 Campsea Ashe Parish Council also perceive that there will be an increase in traffic including HGV movements on the B1078 and other roads through the village as an indirect effect of the proposals for Sizewell C. Some of the traffic that normally uses the proposed route along the A12 is likely to divert through Campsea Ashe and other villages to access locations such

as Aldeburgh, Orford and business sites to the east of the A12. This will include HGVs accessing agricultural locations that previously used the designated lorry route

- 6.10 Fig.1 above highlights the issues regarding the geography, present road structure and land use in the village. There are three blind bends (indicated by red circles) as the B1078 passes through the village where HGVs have to use both sides of the road. All three bends have road junctions. Visibility is restricted in places for both entry and exit to/from the B1078 (this is particularly evident at the junction of Mill Lane and Ashe Road). This has led to accidents and damage to verges. The tree-line along the B1078 also causes HGVs to drive in the middle of the road reducing road safety particularly at the bends.
- 6.11 The junction with Ivy Lodge Road by the church has witnessed damage to the church wall and village sign. The junction to Ivy Lodge Road is particularly tight and HGVs pass closely to a listed building (The Smithy) and church wall. HGVs cannot pass along Ivy Lodge Road causing damage to verges.
- 6.12 Marlesford Road contains a number of single track parts to the route and also a bridge which carries the railway over the road at Bucks Head. The Bucks Head bridge has a clear height restriction. The restriction is regularly not seen or ignored by HGVs and there have been near misses and vehicles having to turn round and reverse back down the road.
- 6.13 The B1078 does not form part of the designated lorry route for Suffolk (see Appendix 1). In addition unclassified roads in the village have also been increasingly used as a route to and from the A12 and the B1116 to Framlingham. HGV movements through the village have been increasing in recent years as evidenced by reports of incidents to Suffolk Highways having a direct impact on listed properties, welfare and safety of residents. Both Ivy Lodge Road and Marlesford Road, which are designated inappropriate for HGVs, have witnessed higher volumes of HGVs in spite of improved signage and negotiation with local businesses.
- 6.14 Campsea Ashe Parish Council are also concerned that diversions may be put in place using the B1078 through the village when construction work for improvements to A12 junctions and the Southern Park and Ride begins or road closures occur for other reasons. It is hoped that this can be avoided in all but extreme emergency situations.
- 6.15 Overall it is considered that, although there has been no published traffic mapping for Campsea Ashe in the Consultation Document, there will be a severe adverse negative impact from the increased traffic, particularly of HGVs due either directly or indirectly to the construction of Sizewell C.
- 6.16 The cumulative impact of Sizewell C and other proposed developments in the area are likely to cause increased traffic flows and have a severe adverse impact on the welfare of people in the village. Road safety concerns will impact on children accessing the playing field: young people will experience difficulties in walking to school bus stops; adults will experience delays in work and leisure journeys. Local facilities may experience problems with parking and locals have difficulties in accessing such facilities.
- 6.17 Campsea Ashe Parish Council recommends that EDF work with SCC Highways to impose Traffic Regulation Orders to mitigate the impact identified at the key pinch points identified

above. The Parish Council recommends that 7.5t weight limits are placed on Ivy Lodge Road (a request has already been made but has stalled due to funding issues) and Marlesford Road. The other unclassified roads would benefit from signage showing routes are unsuitable for HGVs. The B1078 through the village would benefit from road improvements

i) to allow HGVs to safely pass other vehicles, and

ii) to improve visibility at junctions, perhaps through reduction of vegetation.

6.18 Campsea Ashe Parish Council would be happy to discuss these issues with EDF as the potential impact of increased road use in Campsea Ashe has not been fully investigated.

10. Transport: Freight management facility

10.01 Campsea Ashe Parish Council agrees with the proposal for a freight management facility to regulate timing of HGVs to the main development site. It would be beneficial for either the rail or road led strategy.

10.02 Both options of sites lie to the east of the Orwell Bridge. Various groups have suggested a better option would be for a site to the west of the Orwell Bridge to mitigate the potential impact of bridge closure which frequently happens due to high winds. If HGVs followed diversions through Ipswich this could have serious impact on traffic flows and road safety.

11. Transport: Park and Ride

11.02 The Parish Council agrees with the principle of park and ride as a means of reducing road traffic. The proposed southern site should be named Hacheston rather than Wickham Market, as that is where it is located. The site is located to capture traffic arriving from the west via the B1078 in addition to traffic arriving from the south. It is also likely to attract traffic arriving from the east and south-east which will pass through Campsea Ashe. This would result in yet more pressure on the B1078 and unclassified roads in the village, identified in Section 6. In addition any pedestrian or cycle access to the park and ride from the east would be severely restricted due to lack of adequate infrastructure.

11.03 It is believed by many residents within local parishes that EDF has failed to demonstrate that the chosen location is the optimum placement for the southern park and ride. Workers heading from the south will have to use the A12 around Woodbridge which is already seriously congested. A park and ride facility south of Woodbridge, such as Martlesham (with spare capacity) would significantly reduce traffic through Woodbridge and would be preferred by Campsea Ashe Parish Council.

11.04 It appears that operation of the park and ride would commence at about 5am and continue until after midnight with peaks during the day including morning and evening rush hours. This is likely to have an adverse impact on the narrow roads around the B1078/B1116 roundabout causing significant delay for non-Sizewell related traffic from all directions.

- 11.05 The proposed site will blight the landscape and cause light pollution, air pollution and noise pollution. EDF presents insufficient detail on lighting and EDF describes air pollution as “not likely to have a significant air quality effect” and that noise pollution is “not significant”.
- 11.06 Campsea Ashe Parish Council agrees that the site should return to agricultural use after completion of Sizewell C. However there is concern that the land owner may wish to retain that site for other use once the project is completed, extending the area of development beyond existing ‘red line’ boundaries.
- 11.06 Beneficial impacts are that up to 2500 car movements will be taken off the road each day and postal consolidation will reduce LGV movements.
- 11.07 Campsea Ashe Parish Council is concerned about congestion on the entry and exit slip roads from the A12 to the B1078. There are already occasions when traffic queues from on the A12 and the extra traffic can only exacerbate this. Exits from the A12 particularly from the north have poor visibility and there is no speed limit on the bridge over the A12.
- 11.08 There is also concern re congestion on the existing B1078/B1116 roundabout, a main route to the centres of Wickham Market and Framlingham. Extra traffic will be generated at peak times. This is a particular concern as the roundabout forms a ‘hub’ for drop-offs and pick-ups for school transport.
- 11.09 The following measures could be used to mitigate the adverse impact. More capacity for queuing traffic on slip roads could be provided, including at the B1078/B1116 roundabout (a redesign would be beneficial). Vegetation could be removed from areas around the B1078 bridge to give better visibility for joining traffic. The 30mph speed limit in Lower Hacheston could be extended west to the B1078/B1116 roundabout.

12. Transport: road improvements

- 12.01 Campsea Ashe Parish Council is of the view that the Wickham Market mitigation options do not address the issues identified in the Stage 2 Consultation.
- 12.02 The temporary removal of on-street parking between Border Cot Lane and the River Deben Bridge is unworkable. At present on-street parking works as an effective speed reduction measure and its removal is likely to reduce safety on the road. Furthermore there is little scope to find alternative parking for residents.
- 12.03 An alternative route is the preferred alternative of Campsea Ashe Parish Council. However the proposed route (other than Easton Road) is not viable. Glevering Bridge is a single-track listed humpback bridge, there are sharp bends along narrow roads and land use in the vicinity of the road would reduce safety to motorists, pedestrians, horse-riders and other road users. This option is only viable if an alternative route can be found. This may prove difficult in an environmentally sensitive area on a flood plain.
- 12.04 The other road improvements suggested are generally supported by Campsea Ashe Parish Council although the relevant parish councils and residents are the most knowledgeable sources of opinion regarding the appropriateness of each mitigation measure. However, it is

requested that when these improvements are finally designed that they will include provision for cyclists.

13.Consultation process

- 13.01 Campsea Ashe Parish Council shares the concerns of many other parishes and organisations that this consultation may be the final round before submission of the Development Consent Order to the Planning Inspectorate. There still seems an insufficient amount of detail in this proposal, with no formal consideration in the documentation of the impact of increased road traffic on Campsea Ashe. We urge EDF to provide more detail and solutions to the issues raised by both this response and those of other affected parties.
- 13.02 However Campsea Ashe Parish Council have welcomed the opportunity to respond to the proposals.

Richard Fernley

Chair, Campsea Ashe Parish Council

16/09/2019