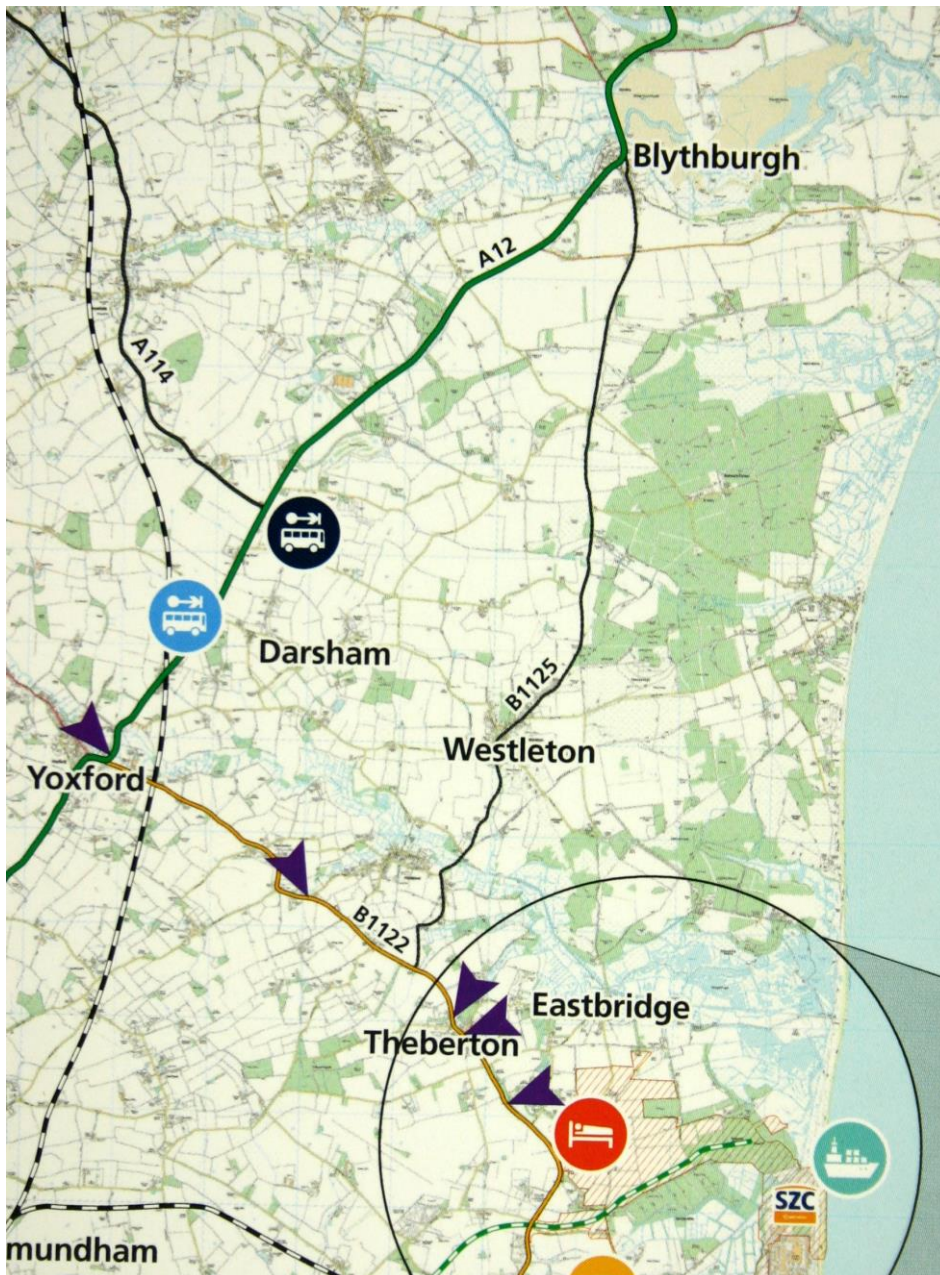


# SIZEWELL C Proposed Nuclear Development

Stage 2 Pre-Application Consultation

## Response from the Parish Council for Blythburgh with Bulcamp and Hinton



January 2017

## A. SUMMARY

Blythburgh Parish Council is concerned that the Sizewell C project will have negative impacts on the village.

The demographics of the village, its heritage and character, its location within an Area of Outstanding Natural Beauty, and the importance of tourism, have yet to be considered adequately by EDFE.

These representations describe the specific traffic impacts on Blythburgh, notably safety and linkages within the village. The Parish Council makes proposals to mitigate these impacts.

Blythburgh parish council supports the maximization of the use of sea and rail transport but is not convinced that the current proposals demonstrate that this objective will be achieved.

Blythburgh parish council does not believe that the proposed use of the B1122 for access to the construction site is feasible. The building of a new link road is supported.

The proposals for a workers' campus on site fail to recognize the negative impacts on local communities and fail to provide legacy housing.

Insufficient time has been allowed for consultation. The consultation process is not transparent, the information provided is inadequate, and the difficulty of preparing constructive responses is thereby increased.

## B. MITIGATION PROPOSALS

See Appendix A.

## C. DISCUSSION

### 1. SIZEWELL C PROPOSALS: OVERALL

#### 1.1 INTRODUCTION

1.1.1 These representations are made on behalf of Blythburgh parish council. They are presented as responses to the questions in the Stage 2 Pre-Application Consultation questionnaire.

- 1.1.2 They were agreed after discussion at a parish council meeting held on 24 January 2017.
- 1.1.3 The council is concerned that the negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1 Consultation (Appendix B), do not appear to have been addressed. The Stage 2 documents contain no references to mitigation action or expenditure of benefit to Blythburgh.
- 1.1.4 There is no information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will indeed be mitigated.

## **1.2 CHARACTER AND LOCATION OF BLYTHBURGH**

- 1.2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a small village in northeast Suffolk, nine miles north of the Sizewell C site. The village has grown up straddling a trunk road, now the A12, created in 1785. The village has approximately 300 residents.
- 1.2.2 Blythburgh is set in a landscape designated as an Area of Outstanding Natural Beauty (AONB), with tidal river, marsh, heath, small woods, pasture and arable fields.
- 1.2.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village.
- 1.2.4 Blythburgh is a very popular tourist destination. Visitors keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the year. The visitors include church lovers; artists; birdwatchers; music lovers; and others who come seeking relaxation in a rural environment.
- 1.2.5 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.
- 1.2.6 Blythburgh is divided physically and mentally by the A12 trunk road and the B1125. Existing problems will be exacerbated by the Sizewell development: traffic density and speed; dangerous bottlenecks and junctions; the lack of safe crossing points for pedestrians; discontinuous footpaths; and the impact of rat-running vehicles on the B1125.
- 1.2.7 Equally, the demographics of Blythburgh are important to understand. The village has an ageing population. Although this is not uncommon in

Suffolk or other parts of the country, its significance in relation to the proposed development of Sizewell C is that many residents of Blythburgh will live through the negative impacts of the construction period, but are unlikely to enjoy any of the potential benefits. Blythburgh parish council therefore urges that this is taken into account in relation to mitigation and compensatory action and expenditure.

- 1.2.8 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh Parish Council is therefore keen to ensure that any development of Sizewell C takes this into account.

## 2. MAIN DEVELOPMENT SITE: ENVIRONMENT

Blythburgh parish council recognizes that the Sizewell project will inevitably have an environmental impact and cause disruption. The council is concerned that the use of green-field sites has not been minimized. Every effort must be made to return any area, used during construction and not required for operation, to its original condition, with the enhancement of environmental quality where this is possible.

## 3. MAIN DEVELOPMENT SITE: NEW ACCESS ROAD

Blythburgh parish council would support a solution that minimized the use of land and, by bridging rather than physically separating parts of SSSI, avoids the fragmentation of natural habitats. The views of specialist agencies such as Natural England must be taken into account.

## 4. MAIN DEVELOPMENT SITE: MANAGING CONSTRUCTION MATERIALS

Blythburgh parish council would, in principle, support a “near location” for borrow pits during construction to keep HGV traffic off the proposed B1122 access route, although the council is concerned about the scale of the proposals. However, the creation of a new access route (See 12.7) to facilitate the movement of material to the south, would obviate the need for borrow pits. Transport by sea would be even more acceptable. On environmental damage, we would lend our support to the views of Natural England (as experts in this field) regarding the preferred option.

Once the plant is operating we would urge that the impact of the creation of borrow pits during the construction phase be mitigated and the land restored as soon as possible to its former state (or better).

## 5. ACCOMMODATION: OVERALL STRATEGY

- 5.1 Blythburgh parish council supports the principle of housing workers at a campus to reduce traffic flows on the local road networks during the peaks associated with shift changes and day worker patterns. Its location (or the location of multiple campuses) should take account of the ready availability of recreational opportunities outside work.

The accommodation facility would provide job opportunities for local communities during the construction phase and the possibility to move to jobs on site during the operational phase.

- 5.2 The council has concerns about utilising a green field site for the campus and the concomitant impact on local residents and tourism.

The campus should be built at a location or locations, and to a standard to provide legacy housing for local communities or, for example, student accommodation.

Any sports facility or facilities should be located to leave a legacy facility and the sharing between campus employees and local residents should be considered.

- 5.3 The parish council has concerns regarding the recreational and homeward journeys of workers housed in the proposed campus. Such movements are not controlled and have the potential to swamp local communities and increase traffic flows on the B1125. (See also 7 on control of traffic).

- 5.4 The exacerbation of traffic problems in Blythburgh should be mitigated by deterring through (rat-running) vehicles from using the B1125 (Dunwich Road and Angel Lane) in the village. Speed cameras should be located on the B1125 at the southern entrance to Blythburgh. The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby's Walks) should be improved as an alternative route for displaced traffic. The village roads should be engineered to make them unattractive for through traffic. (See also section 10).

- 5.5 The creation of local job opportunities at the campus, and the provision of legacy housing would represent mitigation.

## 6. ACCOMMODATION: CAMPUS LAYOUT

Blythburgh parish council considers that the location of the proposed campus and the failure to provide legacy accommodation do not satisfy the criteria set out in section 5 above.

## 7. TRANSPORT: OVERALL STRATEGY

Blythburgh parish council supports action to reduce the volume of freight carried by road; every effort should be made to maximize the use of sea and rail. The council believes that while the proposals for campus accommodation (see sections 5-6) and the park and ride facilities (section 10) will have positive advantages for EDFE, and will reduce the number of vehicles on the roads between the A12 and the Sizewell site, there will be negative consequences for existing businesses, tourism and local communities. There is insufficient evidence in the Stage 2 documentation of action to mitigate negative impacts. See Section 10. Blythburgh parish council is concerned that only HGVs will be controlled; LGVs and private cars will be controlled only indirectly through parking permission at the site and the provision of Park and Rides. Blythburgh parish council urges that all site traffic should use only designated routes and control measures to guarantee this should be established.

## 8. TRANSPORT: RAIL

- 8.1 Blythburgh parish council notes the plan to include up to five freight trains a day (10 movements) either running onto the Sizewell C site via the Green route of a new rail connection or to a freight yard close by the current Leiston freight terminal for transfer by road onto the site.

The parish council welcomes the claimed removal by each train of the equivalent to 50 HGV loads, thereby removing 250 HGV trips per day or 500 movements. Even so this still leaves a large number (450 to 500) of HGV movements on the roads each day.

- 8.2 Blythburgh parish council supports the improvement of the Saxmundham - Leiston branch line with automatic level crossings and necessary upgrades to the track. The Woodbridge to Saxmundham section of the East Suffolk line, currently single track, should be improved by reinstating the double track over the entire section. This would be an important legacy development, permitting increased freight and passenger traffic during the construction and operational phases of Sizewell C. (See also 10.4).
- 8.3 In addition to the freight trains, the use of one of the various types of 'Rolling Highway' systems should be considered, comprising of a series of

very low flat wagons. Lorries drive up a ramp and then along the length of the train to the furthest empty wagon. At the destination the locomotive is removed, a ramp swung into place and the trucks driven off.

If such a train could take 25 HGVs, running five trains a day of this type would remove 250 HGV movements from the roads. Such a scheme would require a depot in the Ipswich area.

These systems are in use in France, Italy, Austria and Switzerland among other countries .

## 9. TRANSPORT: SEA

Blythburgh parish council supports the maximization of the use of sea transport. The council is not qualified to comment on the merits of the jetty proposals but is concerned that full account has not been taken of the fragility of the coastline and its probable retreat, the probability of more frequent tidal surges, and the expected rise in sea level.

## 10. TRANSPORT: PARK AND RIDE

- 10.1. Blythburgh parish council acknowledges that the creation of Park and Ride facilities will decrease the number of vehicles travelling to the construction site, the area needed for vehicle parking there, and facilitate the use of designated routes.
- 10.2. However, no Park and Ride on the A12 south of Blythburgh will be of any advantage to the village. The full flow of traffic from the north to Darsham Park and Ride will pass through the village, adding to the HGV, bus, LGV and other private car traffic generated by the project. It should be noted that Blythburgh church and the village hall are on one side of the A12, and the White Hart and the village shop on the other. Schoolchildren must cross the A12 to catch school buses. (See 10.10). The provision of a pedestrian controlled crossing is required in mitigation.
- 10.3. The project documentation includes a tacit acceptance that Sizewell C traffic will use the B1125 route through the village. Existing problems with traffic flows through Blythburgh on the A12 and B1125 will be exacerbated and the recognized dangers at A12 junctions in the parish between the A145 (to Beccles) and Hazel Lane (to Wenhaston) will increase.
- 10.4. The proposed Park and Ride at Darsham is 4½ miles south-west of Blythburgh. It offers the prospect of a legacy facility of value to users of Darsham station. However, the likely interruption to A12 traffic caused

by the design and operation of the Park and Ride will have a ripple effect to the disadvantage of Blythburgh. Vehicles entering and leaving the Park and Ride must cross streams of through traffic. It seems essential that the entrance must be controlled by traffic lights. A result will be that even short interruptions to a heavy traffic flow will cause significant tailbacks.

- 10.5 The experience of the Latitude Festival at Henham Park is relevant. Traffic flow data show that vehicle numbers were less important than the speed with which the vehicles left the A12 for the festival site. A failure to get traffic off the A12 onto the festival site quickly caused many miles of tailbacks until 2016 when a traffic management plan dealt successfully with that and other issues.
- 10.6 A12 delays will have a cost for regular users. Access to Darsham station will be affected with consequences for rail travellers. Regular southbound travellers from north of Blythburgh will be tempted to avoid delays by seeking alternative routes along minor roads, including the B1125 through Blythburgh village.
- 10.7 The speed of traffic is as important as the numbers of vehicles. Blythburgh parish council believes that, for example, the village will be exposed to danger from late-evening north-bound traffic at shift change. There is a history of vehicles leaving the road at the White Hart bend, resulting in fatalities, at such times when the traffic flow is light. Protection of the properties on the east side of the A12, from the White Hart to the Blyth river bridge, is required in mitigation. (See 10.10 and [www.eadt.co.uk](http://www.eadt.co.uk) 'Blythburgh, crash' reports).
- 10.8 Tailbacks of northbound traffic on the A12, south of the Park and Ride, will have the potential to delay traffic in Yoxford, blocking the B1122 junction, affecting the viability of that route for access to the Sizewell site.
- 10.9 It must also be noted that the Darsham level crossing on the A12 will close up to twice every hour between 0700 and 2300 hours. Park and Ride traffic in both directions will be affected.
- 10.10 Given that the Park and Ride facility offers no benefits to Blythburgh, and will add to problems already exacerbated by the Sizewell project traffic flow through the village, Blythburgh parish council urges that the following mitigation action is taken:
  1. A safe light-controlled crossing on the A12 within the village is provided for pedestrians, with school children of particular concern. It is noted that a pedestrian crossing is proposed for Theberton.
  2. Permanent speed cameras are installed on the A12 north and south of the village. Blythburgh must become known as a place where speeding will always be penalized.



3. Barriers are installed on the east side of the A12 between the White Hart and the river bridge, to protect properties from speeding vehicles that leave the road.
4. Through (rat-running) traffic should be deterred from using the B1125 (Dunwich Road and Angel Lane) in the village. Speed cameras should be located on the B1125 at the southern entrance to the village. The B1387 from its junction with the B1125 (at the water tower) to the A12 (Toby's Walks) should be improved as an alternative route for displaced traffic. The village roads should be engineered to make them unattractive for through traffic.

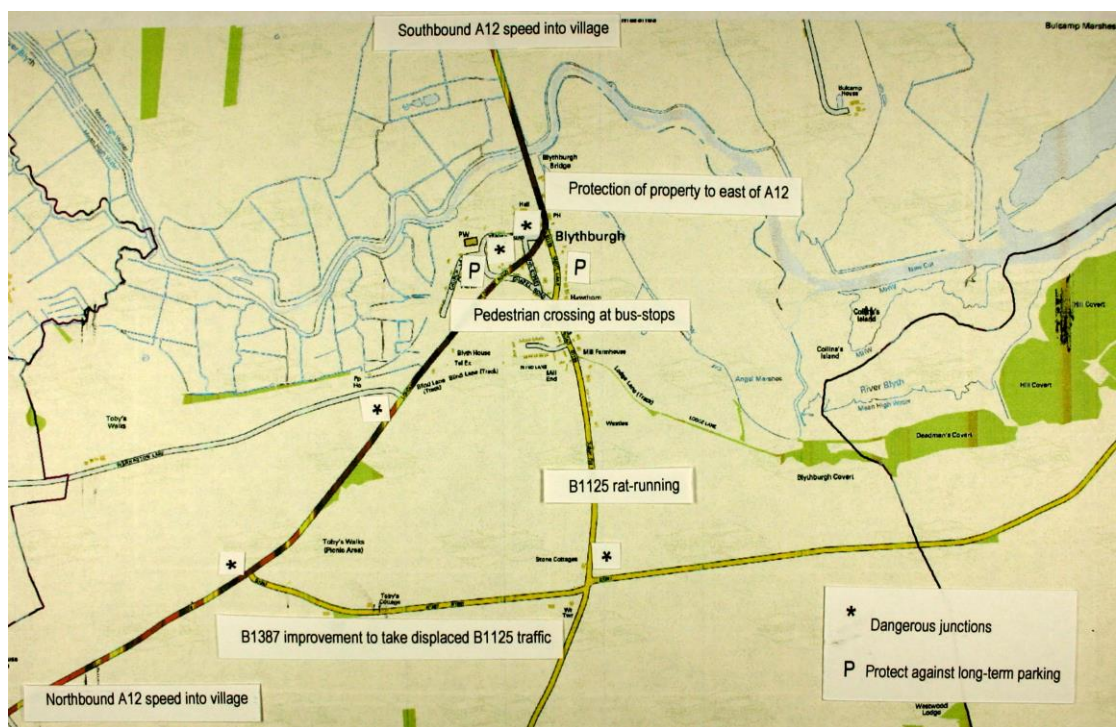


Figure. Blythburgh traffic issues and proposed mitigation

## 11. TRANSPORT: ROAD IMPROVEMENTS – A12

- 11.1. Blythburgh parish council supports the principle of improving the A12, not only to facilitate the movement of vehicles to the Sizewell site, but also to minimize the disruption of existing A12 traffic.
- 11.2. The council supports the proposal for a two-village bypass around Farnham and Stratford St Andrew, as beneficial to existing users of the A12 and the villages concerned.

11.3 Blythburgh parish council is not convinced of the merits of a four-village bypass, in the context of the Sizewell project. It would deliver traffic more quickly to the potential bottleneck at Yoxford (see Section 12) and the large investment involved could be better spent in mitigation action elsewhere.

## 12. TRANSPORT ROAD IMPROVEMENTS – YOXFORD/B1122

12.1. Blythburgh parish council is not convinced that the proposal to use the B1122 as the route to the Sizewell site, even with improvements, is feasible.

12.2. The road would carry the combined flow of traffic from north and south, a combination of HGVs, buses, LGVs and cars. The probability of an accident, with the heavy two-way flow, would be high.

12.3. No alternative routes have been identified. Blythburgh parish council fears that in the event of an incident, traffic from the north will be routed on the B1125 through the village. Blythburgh parish council is concerned that possible alternative routes, such as the B1125, could not without improvement safely carry heavy Sizewell traffic.

12.4. The B1122 proposal will load the villages of Yoxford and Theberton with the full flow of traffic with its concomitant noise, pollution and accident potential.

12.5. A roundabout or light-controlled junction at Yoxford will interrupt A12 traffic, just as the Darsham Park and Ride will. Tailbacks through Yoxford to the south will greatly increase the difficulty of access to the A12 from the A1120, a key tourist route. A possible negative interaction between the Park and Ride and the junction at Yoxford has already been identified (Section 10). It is difficult to see how the A1120 junction could be improved without unacceptable consequences for the fabric of Yoxford.

12.6. The B1122 proposal, by imposing a heavy load on a key access route, and with the probability of incidents that block the road, will increase the difficulty of responding to any emergency at Sizewell.

12.7. Blythburgh parish council supports the building of a new access road from the A12 to Sizewell, south of Yoxford (for example the D2 route considered in the development of Sizewell B). This would relieve Yoxford of much of the proposed traffic load, and avoid the creation of a bottleneck. A12 traffic would flow more freely. The risk of interruption to the flow of men and materials to the Sizewell site would be reduced. A valuable legacy would be created, of continued value during Sizewell C operation. Responses to an emergency at Sizewell would be facilitated.

- 12.8. Blythburgh parish council is aware that responses to some of its concerns about highway matters will be the responsibility of EDFE and for others the Highways Authority. The parish council urges close cooperation between the relevant agencies to ensure that the optimum solution, reflecting the communities' interests as well as those of EDFE, is adopted.

### 13. PEOPLE AND ECONOMY

- 13.1. Blythburgh parish council welcomes the prospect of attracting more people to live in the village during the construction and operational phases, especially young families who would balance the community's age profile, and engage in local activities,
- 13.2. The council is concerned that the tourist trade will be damaged, through the loss of accommodation, disturbance at attractive locations, and deterring visitors by congestion and delays on the A12 and tourist routes. In Blythburgh the White Hart, the village shop and local B&Bs depend upon tourists. The church attracts thousands of visitors every year and they make a significant contribution to the cost of maintaining the fabric.
- 13.3. Mitigation through grant aid to enhance tourist facilities and their promotion is proposed.
- 13.4. Blythburgh village hall hosts many organisations and functions, from the village and beyond. The church houses prestigious events such as the Aldeburgh Festival. Noise, disturbance and unauthorized parking in the village must not be allowed to reduce the attraction of Blythburgh for such activities.
- 13.5. Blythburgh parish council is concerned about the prospect of the village being used for day-long parking by car-sharing pools. The council expects that sharing with a driver authorized to park at Sizewell will be attractive. The church car park is especially vulnerable, and Chapel Road and Angel Lane are locations where long-term parking already happens. Mitigation is urged through the imposition of parking restrictions on village roads (minimizing the effect on residents) and financial support for the church authorities if experience shows that a barrier is needed at their car park.
- 13.6. Blythburgh parish council welcomes any increased educational and job opportunities arising from the Sizewell project, and the benefits that arise from the supply of goods and services. SZC should partner with local schools and colleges to highlight opportunities.
- 13.7. The council is concerned that the Sizewell project's terms of employment will attract local tradesmen so that residents will find it difficult to obtain plumbers, electricians and other services. Mitigation should include the

provision of training opportunities for local young people to fill skills gaps and deal with the consequences of skills' migration.

- 13.8. The possibility of employment at Sizewell for young people and others who may not have their own transport would be enhanced if buses from Lowestoft and Ipswich picked up passengers at points along the route to Sizewell. The establishment of mini-bus shuttle services to the Park and Ride facilities, from such places as Halesworth through local villages, should also be considered. Consideration should be given to the provision of mopeds for local workers where other means of travel to the site or Park and Rides are not viable.
- 13.9. Sizewell needs to be self-sufficient for its workers' health care, to avoid placing an additional load on stretched local resources. Sizewell's recruitment policy should avoid damaging local facilities by poaching staff. Mitigation by providing financial support to local health services should be considered.

## 14. CONSULTATION PROCESS

- 14.1. Blythburgh parish council is concerned that its response to Stage 1 Consultation does not appear to have had any effect on proposals concerning Blythburgh.
- 14.2. Blythburgh parish council is concerned at the lack of transparency in the consultation process. The responses to Stage 1 Consultation are not publically available (unless respondents themselves have chosen to share them). The Stage 2 proposals cannot be related to Stage 1 responses. The existence of confidentiality agreements between EDFE and some organisations further inhibits public debate.
- 14.3. Blythburgh parish council considers that the timing of the Stage 2 Pre-Application Consultation over the Christmas and New Year period was unnecessary and unfortunate and created difficulties for organisations preparing a response.
- 14.4. The local exhibitions were a valuable opportunity to gain information and ask questions.
- 14.5. The provision of help from consultants from Planning Aid England was valuable to some extent; about the process of consultation if not the content of responses. However, the consultants admitted that they had been engaged at a very late stage and they clearly lacked local knowledge. Therefore the support was not as valuable as it could have been.

## APPENDIX A

### MITIGATION PROPOSALS

<b>SECTION IN BLYTHBURGH PARISH COUNCIL RESPONSE TO CONSULTATION</b>	<b>ISSUE RAISED BY BLYTHBURGH PARISH COUNCIL</b>	<b>MITIGATION REQUESTED BY BLYTHBURGH PARISH COUNCIL</b>
Summary	Proposals to use B1122 for access to construction site not feasible	Building of a new link road is supported by Bythburgh Parish Council
4. Main Construction Site. Managing Construction Materials	Borrow Pits used during construction phase	Return to former state or better at end of construction phase / start of full operation
5. Accommodation. Overall Strategy	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Speed camera located at southern end of B1125 at the southern entrance to Blythburgh
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	B1387 from its junction with the B1125 to the A12 should be improved as an alternative route for displaced traffic
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Village roads should be engineered to make them unattractive to through traffic
		Creation of local job opportunities at the Campus would provide some mitigation for disruption.
		Provision of legacy housing
7. Transport. Overall Strategy	Insufficient evidence of action to mitigate the negative impacts of the park & ride at Darsham	Better Access and Egress to the Darsham park & ride. Includes traffic light controls and legacy parking for the period of full operation and for Darsham train station users.

	Only HGV Vehicles will be controlled. Light goods vehicles will only be controlled indirectly by parking permissions	All site traffic should use only designated routes and control measures to guarantee this should be established for both construction and the period of full operation
		Maintain number recognition systems for the period of full operation of Sizewell C, NOT just during construction phase.
8. Transport Rail	Removing 250 HGVs per day from road network is supported but more is needed.	The Woodbridge to Saxmundham line should be dual tracked to remove further HGVs from local road network and provide legacy rail link to operational site
		In addition to freight trains one of the rolling highway train systems should be considered
10. Transport. Park & Ride	Park & Ride Darsham will have NO impact on the additional traffic flow through Blythburgh	School children using the school bus must cross A12 and the provision of a pedestrian crossing is required.
	The Park & Ride will create interruptions to traffic flows on A12 and create ripple effect which will impact Blythburgh Village. Experience of Latitude Festival at Henham Park is relevant. Traffic flow data showed that vehicle numbers were less important than the speed with which traffic left the A12 to the Festival site. A failure to get traffic off the A12 onto the Festival site quickly caused many miles of tailback	<ol style="list-style-type: none"> <li>1. Safe, light controlled pedestrian crossing on the A12 within the village.</li> <li>2. Permanent speed cameras installed on the A12 north and south of the village.</li> <li>3. Barriers installed on East side of A12 between White Hart and River Bridge.</li> <li>4. Through traffic deterred from using B1125 by speed cameras located at the southern edge of the village.</li> <li>5. B1387 should be improved as an alternate route.</li> </ol>
11. Road Improvements. A12	Blythburgh Parish Council does not support the 4 villages by-pass	Monies could be better spent on other mitigation measures.

12. Transport. Road Improvements Yoxford B1122	No route specified for when B1122 blocked for an Emergency situation - road blocked by crash	Need to have an alternate route specified which is not the B1125 through Blythburgh which is not capable of carrying the heavy traffic.
	No route specified, if B1122 blocked, for an Emergency on the nuclear site.	Build new access road from A12 to Sizewell site e.g. D2 route raised as part of the Sizewell B consideration
13. People and Economy	Parish Council concerned that tourist trade damaged through loss of accommodation or traffic impact on tourist routes.	Grant Aid to enhance and promote tourist facilities
	Parish Council concerned the use of village parking facilities for day long parking for car share pools to the Sizewell site during both construction and operation will impact many organisations and functions e.g. Aldeburgh Festival.	Parking restrictions on village roads and, if necessary, mitigation against use of free car parking areas.
	Tradesmen unavailable to local community through Sizewell C Terms of employment	Training opportunities for local young people to fill skills gap and loss of tradesmen.
	Positively support the employment of people from the local areas	1. Buses to pick up along the route to Sizewell. 2. Mini-bus shuttle service to park & ride. 3. Consideration of provision of mopeds under special circumstances
	Sizewell should be self-sufficient for its health care	Recruitment policy to avoid damaging local facilities by "poaching" without concomitant support for the local services.
14. Consultation Process	Timing of the Stage 2 pre-application consultation over the Christmas and New Year period was unnecessary	This should be taken in to account in considering if the Consultation process was robust.

## APPENDIX B

### **SIZEWELL C**

#### **STAGE 1 CONSULTATION**

##### **Representations from Blythburgh Parish Council**

###### **SUMMARY**

The main concerns of Blythburgh Parish Council with the Sizewell C proposal are the direct impacts on the village.

These representations concentrate on the specific traffic impacts on Blythburgh, notably safety and linkages within the village. The Parish Council has sought to offer suggested transport improvements to mitigate these impacts.

The unique demographics of the village, its heritage and character, and the importance of tourism, must also be considered by EDF Energy.

EDFE should ensure additional information is provided before moving to the Stage 2 'Preferred Options' consultation stage. Supplementary stages of consultation are requested, and Blythburgh Parish Council wishes to remain engaged with EDFE throughout this process.

These duly made representations will therefore be put forward as a matter of public record for a future independent Planning Inspector to determine whether EDFE has undertaken the correct process and procedure.

###### **1.0 INTRODUCTION**

- 1.1 These representations are made on behalf of Blythburgh Parish Council.
- 1.2 They were formed in discussions with the Parish Council and local residents, which resulted in a specific meeting held on 31<sup>st</sup> January 2013.

###### **2.0 CHARACTER AND LOCATION OF BLYTHBURGH**



- 2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a small village in northeast Suffolk. The village has grown up straddling either side of the main road, currently the A12, since 1785. The population of the village is now at approximately 300 residents.
- 2.2 The village is set in a landscape of outstanding natural beauty with tidal river, marsh, heath, small woods, pasture and arable fields.
- 2.3 Blythburgh is a very historic part of Suffolk with nearly 1,400 years of recorded history. The village has a magnificent medieval church, which commands the valley of the river Blyth and acts as a beacon for travellers on the A12 trunk road that links London and Yarmouth. It also has other areas of special historical importance within the village.
- 2.4 Blythburgh is also a very popular tourist destination. Visitors that are keen to enjoy the cultural and recreational possibilities of the area increase the population of the village at various times of the years. The visitors include church lovers; artists; birdwatchers; music lovers; and others who come seeking relaxation in a rural environment.
- 2.5 Equally, the demographics of Blythburgh are important to understand, as the village has an ageing population. Although this is not uncommon in Suffolk or other parts of the country as a whole, what it means in relation to proposed development of Sizewell C is that the residents of Blythburgh are likely to see and live through the impacts of the construction period, but are unlikely to actually see any of the proposed benefits. Blythburgh Parish Council therefore request this is taken into account during future discussions with EDFE in relation to potential improvements for the area.
- 2.6 With its special history, its specific demographics, and its important link to tourism, it is vital that character of the area needs to be carefully considered and protected. Blythburgh Parish Council is therefore keen to ensure that any development of Sizewell C takes this into account.

### **3.0 TRAFFIC AND TRANSPORT**

- 3.1 Blythburgh Parish Council understands that the overall construction and commissioning period could last about ten years with significant construction activity over a seven-year period.
- 3.2 It is understood that any further development at Sizewell will require additional transport of materials and workforce.
- 3.3 The use of sea and rail for transporting freight are supported. However, Blythburgh Parish Council has concerns regarding additional road traffic impacts on the A12 and B1125 to the north of the site.

- 3.4 Overall, it is considered that there is a serious lack of transport information provided with this stage of the consultation process, notably an absence of traffic figures and detailed analysis.

#### **4.0 ROAD**

- 4.1 Traffic currently travelling from the 'north' towards the Sizewell site must pass through Blythburgh. Therefore, *any* additional traffic generated as a result of any development at Sizewell C will impact to some extent on Blythburgh.

##### *A12 and B1125*

- 4.2 The A12 and the B1125 pass through Blythburgh and there is a genuine concern that Sizewell C will increase the usage on both of these roads by: the workforce (both on and off duty); transportation vehicles; couriers; deliveries; and business associated with Sizewell (either directly or indirectly).
- 4.3 The A12 is acknowledged as a busy main road, and is a single carriageway at Blythburgh. It is expected the usage of this main route will intensify with the development of Sizewell C. The B1125 is already considered to be well established 'rat-run', and there is a fear that there will be further leakage of traffic onto this road that will eventually pass through Blythburgh.
- 4.4 Workers from the north using the A12 to travel to the 'park and ride' will all pass through Blythburgh. It is however accepted that the 'park and ride' should in theory minimise the use by the workforce of minor roads. It is also accepted that the permit scheme EDFE are proposing should further discourage the workforce from travelling to the Sizewell site independently. It would be useful to see the statistics of existing 'park and ride' schemes currently in operation to assess their effectiveness.
- 4.5 However, in reality the Northern 'park and ride' is unlikely to solve all of the associated workforce traffic issues. It is noted that current Sizewell workforce pass through Blythburgh on the B1125, therefore it is a fair assumption that this will only increase with Sizewell C.
- 4.6 There is also the fear that Blythburgh could become an unofficial 'drop-off' point for car-sharing schemes, which has happened in the past. The provision of a possible designated car park for the village has been identified as a suitable suggestion that would alleviate this problem and would also benefit the village at the same time.
- 4.7 Unless EDFE can categorically and legally guarantee that none of the Sizewell workforce (either existing or future workforce) will use the

B1125 to pass through Blythburgh it must therefore be assumed that there will be some form of car traffic increase as a result of Sizewell C.

- 4.8 As EDFE has also mentioned, the off-duty workforce will also have access to private vehicles. Therefore, even if they are not travelling through Blythburgh for work purposes, there is every likelihood there will be some Sizewell related workforce passing through the village on a daily basis. This also represents an increase in traffic.
- 4.9 As well as the possible increase in workforce traffic, there is also concern about the increase in HGVs, lorries, and light vans passing through the village that would also be associated with Sizewell C. These will not be reduced by the 'park and ride' schemes being proposed.

#### *Transport Statistics*

- 4.10 Blythburgh Parish Council is concerned by the current transport statistics that are being used by EDFE in their Stage 1 consultation process.
- 4.11 EDFE are quoted as saying there should be a 5-15% increase in vehicular traffic on the A12, which they consider to be a "*modest addition to daily flows*".
- 4.12 It does not appear there has been any analysis done on the impacts to the B1125.
- 4.13 Blythburgh Parish Council is in the process of preparing their own Traffic Strategy, which includes traffic counts and data analysis for traffic flows in and around the village.
- 4.14 This traffic strategy is an on-going process, but immediate assessment of the Parish Council's data would appear to be at odds with the suggested traffic flows from EDFE .
- 4.15 The traffic strategy has identified specific 'Sizewell peaks' when the current Sizewell workforce pass through the village. The strategy has also identified junction black spots that must require further consideration.
- 4.16 Blythburgh Parish Council would therefore like the opportunity to discuss the transport models used by the developer and to share their traffic data with EDFE and Suffolk County Council at an appropriate point in the near future. The purpose would be to aid transport discussions for the local area.

#### *Speeding and Safety*

- 4.17 Speeding is a very real issue for the village of Blythburgh, with many vehicles passing through the village in excess of the national speed limits for this area.

- 4.18 As a result of the speeding, there are also very serious safety issues in the village. Like many rural villages in the area, Blythburgh does not have an extensive network of pavements. The result is that the speeding plus the lack of existing pavements means it is already difficult to cross from one side of Blythburgh roads to the other safely and confidently. These factors also discourage people from walking and attempting to cross the A12 in particular, which creates a separation of the village. This issue will only be intensified by any increase in traffic.

## **5.0 RAIL**

- 5.1 It is understood and accepted that the railway must be fully utilised, and the best possible option for linking directly into the Sizewell site is supported.
- 5.2 However, there are concerns about where the anticipated trains will actually be coming from if the railway is extended into the site. There are known railway 'issues' in the surrounding area, including tunnels and line problems, which it is unclear if EDFE have accounted for or fully understood.
- 5.3 It is therefore suggested that EDFE must undertake further analysis of the rail routes being proposed, and also the wider rail network in order to understand the true extent of the impacts with providing rail links directly into the Sizewell site.

## **6.0 TRANSPORT IMPROVEMENTS**

- 6.1 Blythburgh Parish Council has the following suggestions for transport improvements, which would need to be discussed as part of further on-going transport discussions.
- 6.2 Traffic management is seen to be the key to the resolution of most of Blythburgh Parish Council's concerns. It must be remembered that existing traffic, plus holiday and tourism traffic, must be carefully managed with any further Sizewell traffic.

### *Speeding*

- 6.3 Possible solutions to tackle the problem of speeding through the village are required. Specific traffic calming measures should be explored for the B1125, with the specific aim of essentially making this stretch of road more unattractive for speeding and rat-running.

- 6.4 Options for potential traffic calming could include: physically reducing the speed limit through the village; improved road markings; road narrowing (to possibly incorporating additional pavement space); warning lights at the entrances to the village; or additional signage.

#### *Safety*

- 6.5 Any opportunities for improving safety in the village would be very much welcomed by the Parish Council and residents of Blythburgh.
- 6.6 This could include introducing additional pavements, or increasing existing pavements.
- 6.7 Some form of pedestrian crossing should also be considered at a suitable point(s) on the A12 within the village. This could be on a similar principle to that already used in Farnham.
- 6.8 Introducing 'crossing islands' into the middle of the road at either end of the village, would provide people an element of safety and security while crossing the road. This would assist both the elderly and the young in crossing the road, and would also increase the linkage between both sides of the village.

#### *Alternative Options*

- 6.9 Complementary to these proposals is the improvement of the B1387 from the Water Tower crossroads to the Toby's Walks junction with the A12. This would provide a 'Blythburgh southern bypass' for traffic displaced by measures taken to minimise the use of the B1125 through the village.

#### *Overall*

- 6.10 It is acknowledged that any transport improvements would need to be discussed and agreed with Suffolk County Council.
- 6.11 Blythburgh Parish Council would therefore request that further discussions take place between EDFE, Suffolk County Council, and the Parish Council to discuss these issues as part of the on-going dialogue between developer and stakeholders.

## **7.0 NOISE, VIBRATION AND LIGHT POLLUTION**

- 7.1 There are concerns regarding potential noise, vibration, and light pollution associated with the proposed Sizewell C development. Some of these will have a direct impact on Blythburgh, such as a result of any increased traffic, while others will have a much wider impact on the surrounding area.

- 7.2 It is understood that various measures will be undertaken to mitigate these issues, such as bunding and planting at, for example, park and ride sites. However, the lack of information and detail at this stage makes it difficult to assess these impacts.
- 7.3 Appropriate noise, air quality, vibration, and light assessments must be prepared by EDFE in order to provide a full understanding of the impacts proposed on Blythburgh and other affected villages.

## **8.0 EDFE OPTIONS**

- 8.1 Blythburgh Parish Council remains largely indifferent to the options for developments away from the village, such as new road and rail links and the location of an on-site campus. The council nevertheless recognises the indirect benefit of housing a high proportion of the workforce on-site. Their main concerns are however related to the direct impacts to their village, notably through the increase in traffic.
- 8.2 Of the 'park and ride' options being proposed through the consultation, Blythburgh Parish Council are most interested in the Northern options.
- 8.3 Blythburgh Parish Council's preference is for Option 2 at Darsham off the Northern 'park and ride' options presented. The benefit of the site being located adjacent to the existing railway station is seen to offer the best and most suitable option, with the potential for the longer-term improvement of parking arrangements at Darsham station.

## **9.0 IMPACTS ON TOURISM AND LOCAL SERVICES**

- 9.1 Blythburgh Parish Council is also very concerned about the impacts on local services, especially the tourist industry in the area.
- 9.2 Blythburgh is a very historic place, and benefits greatly from tourism in the area at various points throughout the year. This includes walkers, and those who stop off to use the village public house and shop.
- 9.3 It is hoped that any development at Sizewell C will actually benefit the village, by the increase use of its public house, shop and facilities. However, an increase in traffic, and wider impacts of the Sizewell C development could actually be detrimental to the tourist industry in the region. This would have a knock-on effect on villages such as Blythburgh.
- 9.4 Any increase in population into this part of Suffolk as a result of Sizewell C will also have an impact on the services in the surrounding area. This

includes: police; health; schools and education; and other emergency services. It is expected EDFE will consider any responses from these organisations very carefully, as they are best placed to advise on impacts to their services. The Parish Council is also concerned about a possible reduction in availability of tradesmen to the local population, and cost inflation.

## **10.0 CONCLUSIONS**

- 10.1 Blythburgh Parish Council is concerned about the impacts on their village as a result of any development of Sizewell C.
- 10.2 Transport impacts are of serious concern, and must be properly addressed. This must include assessment of speeding and safety issues.
- 10.3 Any future development at Sizewell will have an impact on the surrounding area, local communities, visual appearance, and amenity facilities. These will collectively have an impact on tourism in this area of Suffolk, which will have a knock-on effect on Blythburgh.
- 10.4 The important heritage of Blythburgh, plus its general aging population must also be taken into account.
- 10.5 Blythburgh Parish Council has taken the opportunity to offer some suggestion to mitigate these issues. Together with their additional transport analysis, Blythburgh Parish Council hopes these issues can be discussed with EDFE and Suffolk County Council as part of an on-going dialogue with the affected villages during this consultation process.
- 10.6 Further detailed information and additional stages of consultation are requested before EDFE should progress to the Stage 2 consultation.
- 10.7 It is expected that feedback and experiences from Hinckley Point will be learned from, and should assist EDFE through future consultation stages.