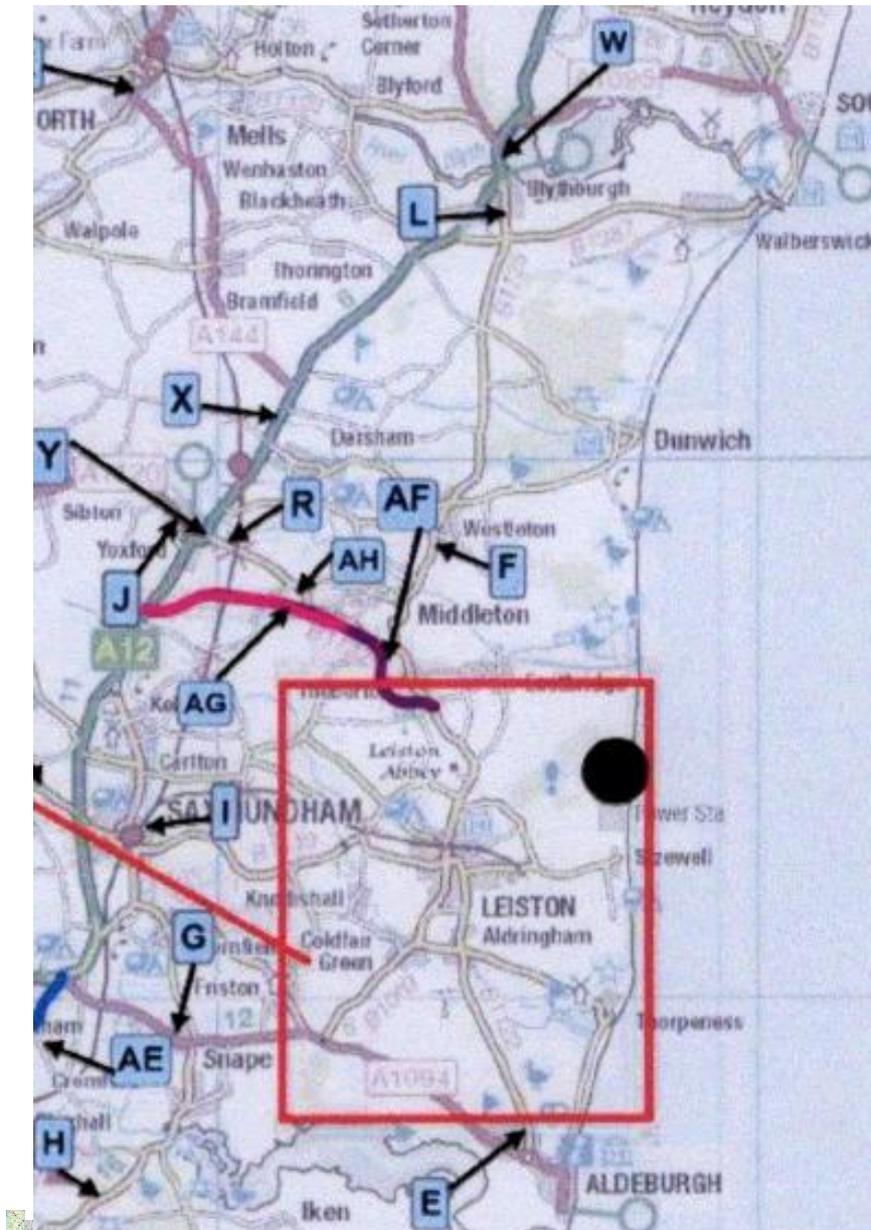


SIZEWELL C Proposed Nuclear Development

Stage 4 Pre-Application Consultation

Response from the Parish Council for
Blythburgh with Bulcamp and Hinton



SEPTEMBER 2019

Sizewell C Proposed Nuclear Development: Stage 4 Pre-Application Consultation

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1. BACKGROUND: CHARACTER AND LOCATION OF BLYTHBURGH

1.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a parish in northeast Suffolk, nine miles north of the Sizewell C site. Blythburgh's small village has grown up straddling a trunk road, now the A12, created in 1785. The parish has approximately 300 residents (see cover page map for the location of Blythburgh in relation to Sizewell).

1.2 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. AONBs have the highest level of protection in relation to landscape and scenic beauty (National Policy Statement for Energy (EN-1), section 5.9.9).

1.3 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, protected by a conservation area.

1.4 Blythburgh should be considered as, and protected as a heritage asset, in terms of NPS (EN-1), sections 5.8.2-4.

1.5 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.

1.6 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.

1.7 Blythburgh village is divided physically and mentally by the A12 trunk road and the B1125. The roads pass through the centre of the conservation area. 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.

1.8 Equally, the demographics of Blythburgh are important to understand. The parish 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 (Appendix 1 refers) and compensatory action and expenditure.

1.9 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. EXECUTIVE SUMMARY

Blythburgh Parish Council would like to state that:

- the Sizewell C Stage 4 Consultation is an addendum to, rather than a replacement for, the Stage 3 Consultation and as such would wish ALL their Stage 3 comments to remain valid;
- comments for Stage 4 address only the new option of “an integrated freight management strategy”;
- there is continued support for a suitable rail-led strategy augmented by certain road infrastructure improvements;
- the integrated strategy seems to merely to address concerns about the deliverability of the rail-led strategy and puts forward a worst of all worlds scenario;
- 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;
- the limited use of a “by sea” strategy is a lost opportunity;
- little mention has been made of the Abnormal Large Loads and no mitigation (except a means to cut across the roundabouts at the entrance to the Darsham Park & Ride and at Yoxford) has been proposed regarding these movements;
- the baseline traffic figures given for Blythburgh location L remain a serious underestimate;
- it has little confidence in this assertion that “the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded”;
- issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed in Stage 4 consultation and we wish to reiterate our concerns in this regard and the need for mitigation;
- no consideration has been given to safety of the junction of the A145 and A12 despite this being a known accident prone junction; and
- it supports the retention of the proposed link road after construction to allow fast moving traffic to access the site whilst allowing the almost parallel road to serve more “local” traffic, tourists and cyclists.

Appendix 1 outlines the Parish Council's suggestions for Mitigation against the worst impacts of increases in traffic flows.

Appendix 2 provides a summary of parishioner comments raised in the Open Forum of the Blythburgh Parish Council Meeting held on 12 September 2019.

Appendices 3, 4 and 5 contain the Parish Council's responses to Stages 1, 2 and 3 respectively.

3. DETAILED COMMENTS

- 3.1 These representations are made on behalf of Blythburgh Parish Council. They were drafted by the council's Planning Advisory Group and agreed after discussion at a parish council meeting on 12 September 2019.
- 3.2 Blythburgh Parish Council consider that the Sizewell C Stage 4 Consultation is an addendum to, rather than a replacement for, the Stage 3 Consultation and as such would wish **ALL** their Stage 3 comments, including those on the Rail-led and Road-led strategies to remain valid (Reference: Stage 4 Consultation Document, Section 1.1.7 page 17). Appendices 3, 4 and 5 contain the Parish Council's responses to Stages 1, 2 and 3 respectively.
- 3.3 Blythburgh Parish Council has, therefore, focused their comments for Stage 4 to address only the new option of "an integrated freight management strategy"; their continued support for a suitable rail-led strategy augmented by certain road infrastructure improvements is re-iterated. However, for the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that their MITIGATION requests (Appendix 1 refers) apply to ALL eventualities regarding freight strategy for the construction of Sizewell C be it (i) rail led augmented by certain road infrastructure improvements, (ii) a road-led strategy or (iii) an integrated strategy .
- 3.4 It was with dismay, but not surprise, that Blythburgh Parish Council note EDF's comment (Reference; Stage 4 Consultation Document, Section 3.1 page 61) "we have become concerned that the rail-led strategy may not be deliverable within the necessary timescale to limit the impacts of construction traffic and accordingly at this Stage 4 consultation, we are seeking views on a further alternative freight management strategy option: an integrated strategy." Given that project timescales are driven solely by EDF, Blythburgh Parish Council fail to see and cannot accept that "the rail-led strategy may not be deliverable within the necessary timescale" is justification for abandoning the rail-led strategy detailed in Stage 3 and supported by many Stage 3 respondents.

- 3.5 Blythburgh Parish Council re-iterates their support for a Rail-led strategy augmented by some road improvements to facilitate the necessary increase in road traffic whilst maximising the use of rail to keep freight movements on the road infrastructure to a minimum. The apparently hastily conceived “integrated strategy” described in Stage 4 seems to merely to address concerns about the deliverability of the rail-led strategy as previously described and puts forward a worst of all worlds scenario where the devil is in the detail. *For example: Stage 4 Consultation Document, Table 3.2 page 65 shows that under the rail-led strategy the proposed HGV operation would be from 7am to 11pm with 225 HGVs at peak (450 movements). The “new” integrated strategy allows for HGV operation potentially over “extended hours” with a typical day peak of 325 HGV (650 movements). For the road-led strategy the equivalent figures allows for HGV operation again potentially over “extended hours” with a typical day peak of 375 HGV (750 movements).* The potential benefit of moving to the integrated strategy (as described) over the rail-led strategy when compared to the road-led strategy is neither obvious nor persuasive. Blythburgh Parish Council would reiterate their view that 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 order to gain real benefits we would urge that in addition to freight trains one of the rolling highway train systems should be considered.
- 3.6 The limited use of a “by sea” strategy is explained by EDF but Blythburgh Parish Council considers this a lost opportunity. The use of a jetty during the construction of Sizewell B reduced the necessity for many large loads being transported to the construction site by both road and rail. Whilst appreciating the previously described impact on the marine and coastal environment Blythburgh Parish Council would urge, even at this late stage, further exploration of this option and consideration of the benefits when measured against the not inconsiderable disruption to local populations and infrastructure links highlighted to date by the other proposed options.
- 3.7 Furthermore, Blythburgh Parish Council notes that under all strategies Abnormal Large Loads will be off-loaded through the port of Lowestoft. These loads will make their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford – Stage 4 Consultation Document, Section 2, figures 2.24 and 2.29 refer. Little mention has been made of these loads and no mitigation (except a means to cut across the roundabouts at the entrance to the Darsham Park & Ride and at Yoxford) has been proposed regarding these movements. We particularly draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to “pinch points” on the B1125 and the A12) and local air quality has already been raised but not addressed.

- 3.8 The baseline traffic figures given for Blythburgh location L remain at 1650 for the movement of traffic in both directions (Stage 4 Consultation Document, Table 4.2 page 88 refers). This baseline figure remains the same as at previous consultations despite Blythburgh Parish Council meeting with EDF traffic expert on 29/3/2019 to discuss and hand over traffic data for this location measured on a regular basis over a number of years with a calibrated VAS monitor. The data handed over showed conclusively that the 1650 figure presented in Table 4.2 is a serious underestimate. Figures measured with the same VAS monitor actually confirm EDF's baseline data for the A12 locations at Blythburgh. No explanation has been forthcoming for the discrepancy at Location L regarding the baseline data for which actual measurements exist. Comparison with data in table 4.2 for the Westleton Location F reinforces our conclusion that the baseline measurement at Location L is in error. Section 4.10.3 page 86 identifies Blythburgh Location L as one of the locations where "the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded". We have little confidence in this assertion when the baseline figure at Location L is a serious underestimate and figures provided in a face to face meeting to discuss and demonstrate this have seemingly been ignored. The subsequent statement at Section 4.10.6 that "EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation" would seem to be a tick box statement rather than a genuine wish to engage given our experience to date. It is to be hoped that this will change or that it will be mandated and monitored by the Inspector. Our suggestions for mitigation against the worst impacts of increases in traffic flows in already sensitive "pinch points" are detailed in the attached "Mitigation Table".
- 3.9 Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed in Stage 4 consultation. We wish to reiterate our concerns in this regard and the need for mitigation of both (i) rat running and (ii) fly parking. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.
- 3.10 No consideration has been given to safety of the junction of the A145 and A12 despite this being a known accident prone junction. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction. Blythburgh Parish Council would ask that consideration be given to mitigation of these enhanced risks and ensuing traffic congestion.
- 3.11 Sizewell Link Road (reference Stage 4 Consultation, Section 2.6.22 page 38). EDF are seeking views at Stage 4 as to whether this link road, if built, should be retained after construction is completed. Blythburgh Parish Council supports the retention of such infrastructure to allow fast moving traffic to access the site whilst

allowing the almost parallel road to serve more “local” traffic, tourists and cyclists. Both roads should be maintained.

3.12 As part of this consultation, EDF requested comments regarding the consultation process and we offer the following observations

- 3.12.1 Timing of this consultation over the main summer holiday period presented some challenges in coordinating responses.
- 3.12.2 The negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1, 2 and 3 Consultations (Appendix 3, 4 and 5 respectively), do not appear to have been addressed. The Stage 4 documents contain no references to mitigation action or expenditure of specific benefit to Blythburgh.
- 3.12.3 There is still insufficient information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will be mitigated at all let alone prior to the commencement of the project
- 3.12.4 It was disappointing that the Stage 4 documentation provided no answers to questions the Parish Council had raised at Stage 3 so these still remain unaddressed.
- 3.12.5 There is a lack of clarity as to how EDF will handle responses to Stage 3 and 4 and deal with the inter-relationship between these comments.
- 3.12.6 On the plus side, the staff at the Sizewell information centre in Leiston and those staffing the “Have your Say” sessions were very helpful in providing written material and answering questions that were within their remit.
- 3.12.7 Planning Aid England have, again, been extremely helpful with aiding our understanding of the process and structuring of responses.

Appendix 1: Outlines the Parish Council’s suggestions for additional mitigation against the worst impacts of increases in traffic flows.

Appendix 2: Provides a summary of parishioner comments from the Parish Council Meeting Open Forum held on 12 September 2019.

Appendices 3, 4 and 5 contain the Parish Council’s responses to Stages 1, 2 and 3 respectively.

Appendix 1

Blythburgh Parish Council's suggestions for additional mitigation against the worst impacts of increases in traffic flows

Important note: For the avoidance of doubt, Blythburgh Parish Council wishes to reiterate that these MITIGATION requests apply to all eventualities regarding freight strategy for the construction of Sizewell C be it (i) rail led augmented by certain road infrastructure improvements, (ii) road-led strategy or (iii) an integrated strategy .

Section in Sizewell C Stage 4 Consultation Document	Section in Blythburgh Parish Council Response to Stage 4 Consultation Document	Issue Raised by Blythburgh Parish Council	MITIGATION Requested / Suggested by Blythburgh Parish Council
Section 2, figures 2.24 and 2.29 refer.	Response 3.7	Abnormal Large Loads making their way to the Sizewell site along the A12 from the North, before turning off the A12 at Yoxford. We draw attention to (i) bridge and road surface quality at the entrance to Blythburgh village from the North, (ii) the sharp bend on the A12 at Blythburgh (junction with the B1125) where issues with traffic flow (tailbacks due to “pinch points” on the B1125 and the A12) and local air quality has already been raised but not addressed.	EDF to work with Highways to confirm Blythburgh Bridge loading requirements and impact of these large loads on road subsidence on A12 at entrance (30mph) to Blythburgh village from the north. Baseline air quality survey at junction of A12 with B1125 and regular on-going checks during construction. If problem identified the appropriate amelioration measures should be taken.
Section 4, Table 4.2 page 88 refers	Response 3.8	Baseline traffic figures given for Blythburgh location L are an underestimate.	We would like to understand why the figures we supplied 29/3/19 have seemingly been ignored.

<p>Section 4.10.3 page 86</p>		<p>Section 4.10.3 page 86 identifies Blythburgh Location L as one of the locations where “the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded”.</p>	<p>Additional traffic on this road exacerbates an existing problem and mitigation is required: number plate recognition and other traffic calming measures to discourage use of this road are requested.</p>
<p>Section 4.10.6 states that “EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation”</p>	<p>Response 3.8</p>	<p>Blythburgh Parish Council has identified 2 main “pinch points” within the village which impact the flow of traffic on the A12. These will be exacerbated by SZC traffic</p> <ul style="list-style-type: none"> - Narrow entrance to the B1125 from the A12 causing tail backs on the A12 for traffic from the north and also traffic joining the A12 from the B1125 – the bus stop on the South bound side of the A12 (towards Ipswich) within the village blocks the carriageway and creates traffic tailbacks on the A12 towards the junction with the B1125 	<p>Number plate recognition on the B1125 to discourage rat running and enforce utilisation of the Darsham park & ride.</p> <p>School children using the school bus must cross A12 and the provision of a pedestrian crossing or refuge is required.</p> <p>Create a pull-off for the bus so that traffic on the south bound A12 is not disrupted? Moving the bus stop may be required?</p>
<p>Section 4.10.6 states that “EDF energy will continue to engage with parish councils</p>	<p>Response 3.9</p>	<p>Issues of rat running and fly parking within Blythburgh village and along the B1125 have not been addressed. We reiterate our concerns and the need for</p>	<p>Speed cameras with number plate recognition located on the B1125 in Blythburgh</p> <p>B1387 from its junction with the B1125 to the A12</p>

<p>with regards to potential additional mitigation in these areas following this Stage 4 consultation”</p>		<p>mitigation of both (i) rat running and (ii) fly parking. We raise this issue again in light of the negative feedback regarding these issues being highlighted during the on-going construction work at Hinkley Point C.</p>	<p>should be improved as an alternative route for displaced traffic</p> <p>Village roads should be engineered to make them unattractive to through traffic</p>
<p>Section 4.10.6 states that “EDF energy will continue to engage with parish councils with regards to potential additional mitigation in these areas following this Stage 4 consultation”</p>	<p>Response 3.10</p>	<p>Safety of the junction of the A145 and A12. Additional traffic flows identified and associated with the Sizewell C proposal (both construction and operation) will exacerbate existing and known issues with this junction.</p>	<p>Consideration should be given to mitigating these enhanced risks and the ensuing traffic congestion. At the very least, a roundabout should be considered for this junction.</p>

Appendix 2

Summary of parishioner comments from the Parish Council Meeting Open Forum held on 12 September 2019.

Blythburgh Parish Council hosted an Open Forum Meeting to give Parishioners an opportunity to raise their concerns, or otherwise, regarding the Stage 4 Consultation so their comments could be represented to EDF. 19 parishioners attended.

The meeting opened with a brief background and “next steps” to set the scene. Parishioners were invited to put forward their concerns, or otherwise, relating to the Stage 4 pre-application consultation document. Parishioners were also encouraged to submit their own individual response to the Consultation.

Key areas of comment are given below and, where appropriate, have been included in the main body of our response:

How does an individual respond to EDF?

A copy of the summary consultation document had been put through parishioners doors containing all EDF contact details. The closing date of 27th September 2019 was reiterated and Parishioners encouraged to submit their own responses.

Freight Management Strategy

Many Parishioners thought that it was wrong for EDF to have discounted a “by sea” option. They would like to see this reconsidered.

Given the expertise France has with trains and freight movement why does EDF not seem to favour a rail led strategy?

Rail-led strategy detailed at Stage 3 should be actively pursued.

Traffic within the Local Area of Blythburgh

Regardless of the final freight management strategy adopted the general mood of the meeting was that traffic would increase significantly and mitigation of the worst effects of this should be considered minimum. Specifically parishioners raise the following points:

- *B1125 needs to be improved as the traffic will increase.*
- *The level of noise increases with the speed of traffic and therefore a method to reduce speed is required.*
- *The increased volume of traffic will increase pollution levels. How will this be managed?*

- *Concerns that Sizewell C subcontractors and delivery vehicles using the B1125 (Angel Lane / Dunwich Road) would not be identified by the use of number plate recognition. How will the route to site for this traffic be controlled?*
- *Road Surface: Are the roads (B1125 and A12) able to sustain the increased level of traffic and proposed heavy loads? These roads are already deteriorating with current traffic levels.*
- *Fly Parking: Already of concern this is reported to be a greater issue than expected at Hinkley. Would number plate recognition help with this problem?*
- *Pedestrian paths: The amount of pedestrian footway along Angel Lane and Dunwich Road (the B1125 close to its junction with the A12) is dangerously low restricting the ability of pedestrians to move from one side of the village to the other safely. This will be exacerbated with the increased traffic along this road. Number plate recognition and speed controls would help but so would an additional footpath.*
- *Make B1125 Angel lane / Dunwich Road one way: The Chairman pointed out that this is beyond the scope of EDFs remit as it is an existing problem. Requests to EDF relate to mitigate for impacts created during construction phase.*

“How do we know EDF will react to issues raised?”

There was disappointment expressed that issues that had been raised in previous Consultation responses appeared to have gone unacknowledged. Does this mean that those comments / issues had been lost and would not be addressed? The Council reported that we have to rely on the inspectors carrying out their role diligently, which we have every reason to believe that they do.

Appendix 3

Parish Council's responses to Stage 1

SIZEWELL C

STAGE 1 CONSULTATION

Representations from Blythburgh with Bulcamp & Hinton 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.

EDF Energy 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 EDF Energy 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 EDF Energy 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 31st 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 year. 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 EDF Energy 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 EDF Energy 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 EDF Energy 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 EDF Energy 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 EDF Energy in their Stage 1 consultation process.
- 4.11 EDF Energy 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 EDF Energy.
- 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 EDF Energy 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 EDF Energy have accounted for or fully understood.
- 5.3 It is therefore suggested that EDF Energy 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 EDF Energy, 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 EDF Energy in order to provide a full understanding of the impacts proposed on Blythburgh and other affected villages.

8.0 EDF ENERGY 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 EDF Energy 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 EDF Energy 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 EDF Energy 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 EDF Energy through future consultation stages.

Appendix 4

Parish Council's responses to Stage 2

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 – *given as Appendix 3 in Stage 4 Consultation Response*), 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 '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.

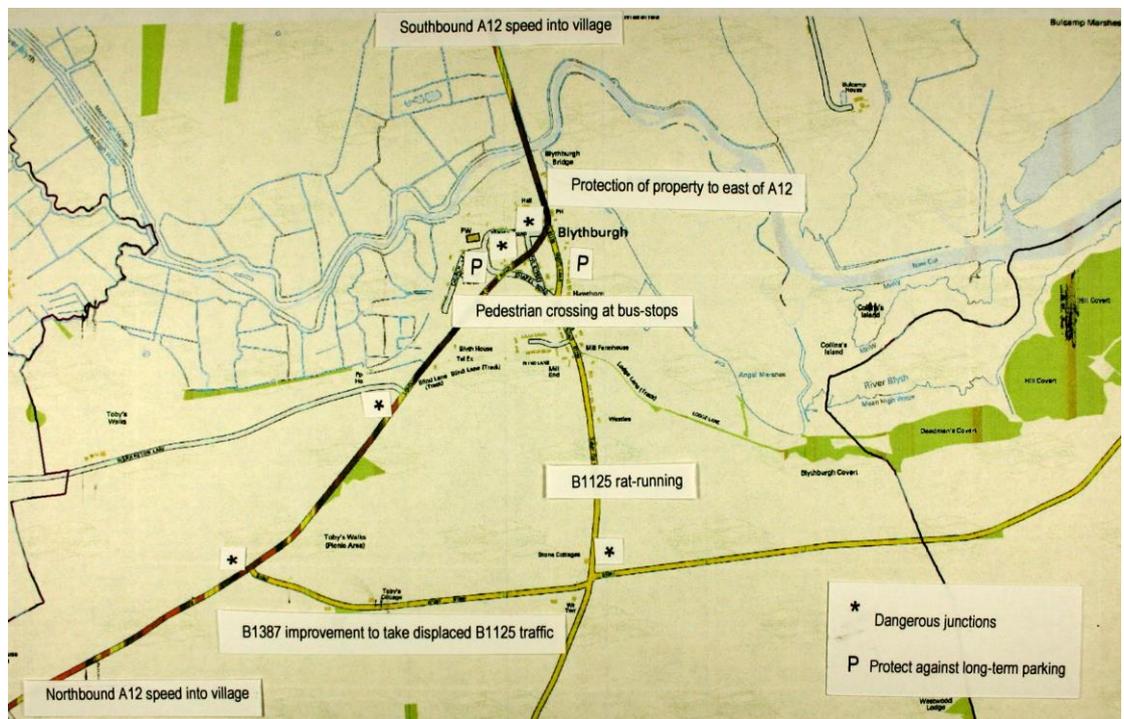


Figure. Blythburgh traffic issues and proposed mitigation

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

SECTION IN BLYTHBURGH PARISH COUNCIL RESPONSE TO CONSULTATION	ISSUE RAISED BY BLYTHBURGH PARISH COUNCIL	MITIGATION REQUESTED BY BLYTHBURGH PARISH COUNCIL
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"> 1. Safe, light controlled pedestrian crossing on the A12 within the village. 2. Permanent speed cameras installed on the A12 north and south of the village. 3. Barriers installed on East side of A12 between White Hart and River Bridge. 4. Through traffic deterred from using B1125 by speed cameras located at the southern edge of the village. 5. B1387 should be improved as an alternate route.

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 - *given as Appendix 3 in Stage 4 Consultation response*

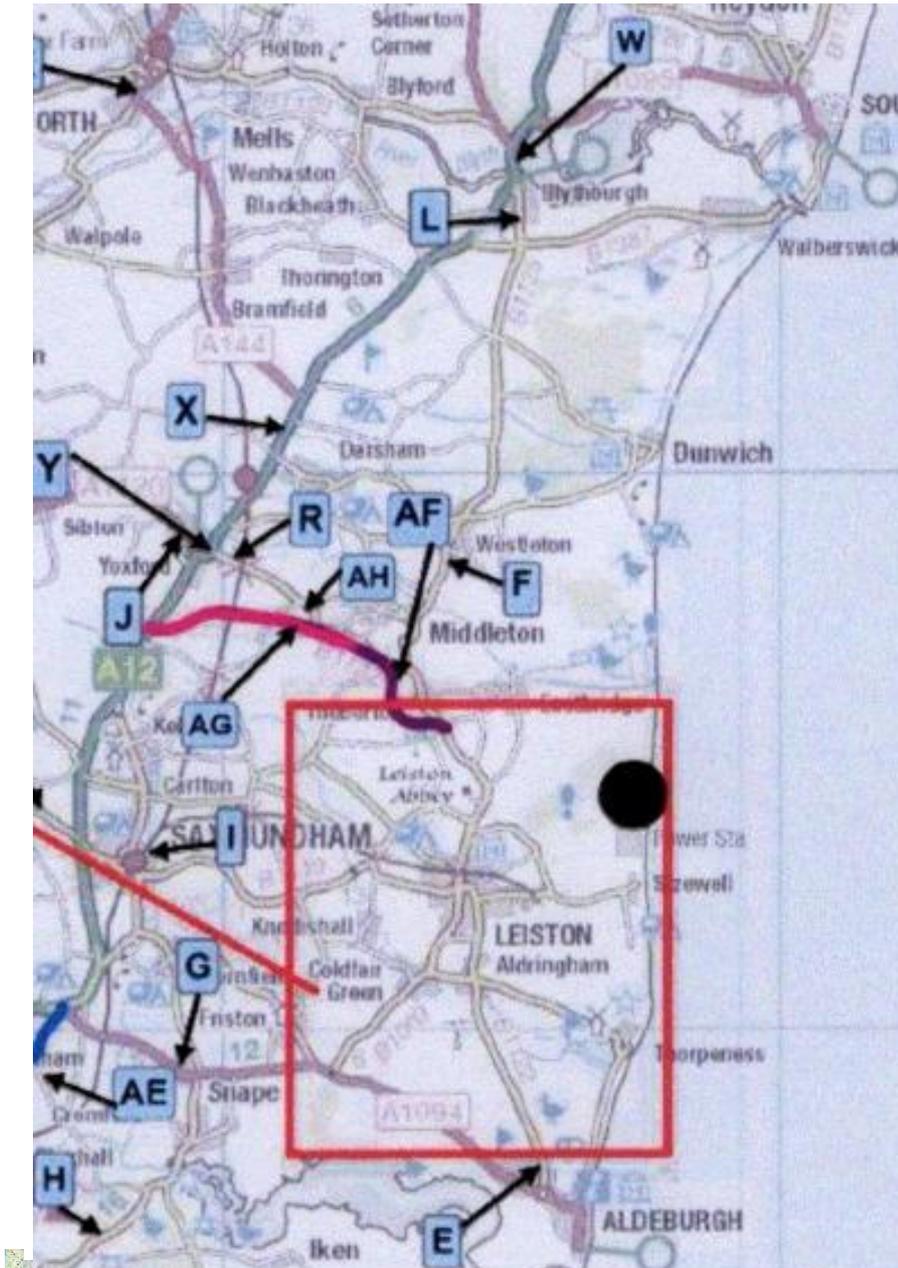
Appendix 5

Parish Council's responses to Stage 3

SIZEWELL C Proposed Nuclear Development

Stage 3 Pre-Application Consultation

Response from the Parish Council for Blythburgh with Bulcamp and Hinton



MARCH 2019

1. SUMMARY

- 1.1 Blythburgh parish council is concerned that the Sizewell C project will have negative impacts on the village, and that there are no specific mitigation proposals.
- 1.2 The Stage 3 consultation document shows that some attention has been paid to matters raised by communities in the Stage 2 process, but there has been no response to concerns raised about the direct impacts on Blythburgh. There is no evidence of the criteria used to measure the negative impacts on communities' amenity.
- 1.3 The demographics of Blythburgh, 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.
- 1.4 Traffic through Blythburgh village, divided by the A12 and B1125, will increase but Blythburgh parish council cannot reconcile its own traffic figures with those presented by EDFE.
- 1.5 These representations describe the specific impacts on Blythburgh, notably safety and linkages within the village. The parish council makes proposals to mitigate these impacts.
- 1.6 Blythburgh parish council supports the maximization of the use of sea and rail transport but the current proposals demonstrate that this objective will not be achieved.
- 1.7 The council is concerned about coastal erosion to the north of the site and possible impacts on the Blyth estuary.
- 1.8 Blythburgh parish council does not believe that the use of the B1122 for access to the construction site is feasible. The building of a new link road south of Yoxford is supported, with a connection to it for traffic from the north. The link roads should also be part of the rail-led strategy if adopted.
- 1.9 Certain improvements to the rail system as part of the rail-led strategy should be adopted as part of the road-led strategy.
- 1.10 The proposals for a workers' campus still fail to recognize the negative impacts on local communities, fail to provide legacy housing, and will have considerable negative environmental impacts.
- 1.11 The council urges that mitigation improvements to the road and rail infrastructure should be completed before the SZC project generates significant increases in traffic. Such timing for the improvements should be a condition for the approval of the project. The council is concerned that 'many of these [mitigation] measures would not be in place during

the early years of the construction phase [Stage 3 doc. ref. 6.6.29].’ See Appendix B for Blythburgh parish council’s mitigation proposals.

1.12 The consultation process is not transparent, the information provided is inadequate, and the difficulty of preparing constructive responses is thereby increased. However, the proposal to consult with individual communities is welcomed [Stage 3 doc. refs 5.2.25 and 6.12.2]. Blythburgh parish council proposes the following topics for direct discussion:

- 1.12.1 The reconciliation of Blythburgh and EDFE traffic data.
- 1.12.2 The density and speed of traffic on the A12. A safe light-controlled crossing on the A12 within the village is provided for pedestrians, with school children of particular concern.
- 1.12.3 Permanent number recognition 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.
- 1.12.4 Barriers are installed on the east side of the A12 between the Angel Lane junction and the river bridge, to protect properties from speeding vehicles that leave the road.
- 1.12.5 Through (rat-running) traffic should be deterred from using the B1125 (Dunwich Road and Angel Lane) in the village. Number recognition speed cameras should be located on the B1125 in the village.
- 1.12.6 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. Consideration should be given to linking this road with Wenhaston Lane at a new roundabout. The B1125 in the village should be engineered to make it unattractive for through traffic.
- 1.12.7 The potential for fly-parking in Blythburgh should be recognized and proposals developed to minimize it.

(See below 2.7.2-15 and 2.10.)

Blythburgh parish council’s response to Stage 1 and 2 Consultations is included as Appendix C, in italics -- *given as Appendix 3 and 4 respectively in Stage 4 Consultation response.*

2. DETAILED RESPONSE

2.1 SIZEWELL C PROPOSALS: OVERALL

2.1.1 INTRODUCTION

2.1.1.1 These representations are made on behalf of Blythburgh parish council.

2.1.1.2 They were drafted by the council's Planning Advisory Group, modified in the light of Planning Aid England's comments, and agreed after discussion at a parish council meeting on 25 March 2019.

2.1.1.3 The council is concerned that the negative impacts on Blythburgh, during construction and operation, identified in its response to Stage 1 and 2 Consultations (Appendix C), do not appear to have been addressed. The Stage 3 documents contain no references to mitigation action or expenditure of specific benefit to Blythburgh.

2.1.1.4 There is insufficient information about the phasing of mitigation investment and whether the negative impacts of the early years of the construction phase will indeed be mitigated [Stage 3 doc. 6.6.29].

2.1.2 CHARACTER AND LOCATION OF BLYTHBURGH

2.1.2.1 Blythburgh, with its hamlets of Bulcamp and Hinton, is a parish in northeast Suffolk, nine miles north of the Sizewell C site. Blythburgh's small village has grown up straddling a trunk road, now the A12, created in 1785. The parish has approximately 300 residents. (See map p.1 for the location of Blythburgh in relation to Sizewell.)

2.1.2.2 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. AONBs have the highest level of protection in relation to landscape and scenic beauty (National Policy Statement for Energy (EN-1), section 5.9.9).

2.1.2.3 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, protected by a conservation area.

2.1.2.4 Blythburgh should be considered as, and protected as a heritage asset, in terms of NPS (EN-1), sections 5.8.2-4.

2.1.2.5 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.

2.1.2.6 The attraction of the area to visitors highlights its equal importance to the residents and their desire to protect this amenity.

2.1.2.7 Blythburgh village is divided physically and mentally by the A12 trunk road and the B1125. The roads pass through the centre of the conservation area. 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.

2.1.2.8 Equally, the demographics of Blythburgh are important to understand. The parish 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.

2.1.2.9 Blythburgh also has a number of schoolchildren and their safety in using school buses that stop on the A12 is an important consideration.

2.1.2.10 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.

2.2 MAIN DEVELOPMENT SITE: ENVIRONMENT

2.2.1 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 current land use, with the enhancement of environmental quality where this is possible.

2.2.2 Blythburgh parish council is not convinced that sufficient account has been taken of the negative impacts on the internationally important Minsmere nature reserve, in respect, for example, of contamination from waste and surface water, and noise and light pollution.

2.2.3 The disturbance of coastal processes is also of concern to the council. The loss of shingle from the Walberswick and Minsmere coastline, and impact on the tidal character of the Blyth estuary, with its implications for the flooding of properties in Blythburgh, must be avoided. (See section 2.9 below and Appendix A.)

2.3 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.

2.4 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 access routes, although the council is concerned about the scale of the proposals. However, the creation of a new access route to facilitate the movement of material to the south, would obviate the need for borrow pits. 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).

2.5 ACCOMMODATION: OVERALL STRATEGY

2.5.1 Blythburgh parish council recognizes that housing workers at a campus reduces traffic flows on the local road networks during the peaks associated with shift changes and day worker patterns, and would provide job opportunities for local communities during the construction phase and the possibility to move to jobs on site during the operational phase. This would represent mitigation of some adverse impacts.

2.5.2 However, the council has concerns about utilising a green field site for the campus. The lack of provision of legacy housing where it is needed, is also a matter for concern. 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.

The proposal for a sports facility to leave a legacy facility for local residents is welcomed.

- 2.5.3 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 small local communities and increase traffic flows on the B1125. (See 2.7.6-12 and 2.10.3 below)

2.6 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 2.5 above.

2.7 TRANSPORT: OVERALL STRATEGY

- 2.7.1 Blythburgh parish council supports action to reduce the volume of freight carried by road; the council regrets the elimination of the sea option and the pessimism about the use of the rail-led strategy. The council believes that while the proposals for campus accommodation (see sections 2.5-2.6) and the park and ride facilities (section 2.10) 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.
- 2.7.2 Blythburgh parish council is pleased that EDFE has recognized the concerns of several consultees about speeding traffic and the exacerbation by SZC traffic of existing problems [Stage 3 doc. 5.2.25]. Blythburgh parish council welcomes the proposal for EDFE discussions with individual communities. EDFE should provide appropriate specialists for such discussions. See 1.12.1-7 above for a list of proposals for discussion.
- 2.7.3 The recognition of the impact on some local villages and the provision of bypasses is welcomed. However, there is no evidence in the Stage 3 documentation of action to mitigate the specific negative impacts on Blythburgh already identified in the Stage 2 response (see 2.10 below and Appendix C). 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. Parking permits linked to name but not vehicle number would make it impossible to monitor rat-running or non-contractual use of minor roads.

- 2.7.4 Concerns about the B1125 have already been recognized by Suffolk County Council's Highways Unit, with 'Blythburgh Village Only' signs installed at each end of the village route. However, the signs are generally ignored. *Blythburgh Conservation Area Appraisal* (Suffolk Coastal District Council July 2012) p.17 states 'The road from Blythburgh to Leiston ... could be altered to make it accessible to the village but no longer a through road.'
- 2.7.5 Blythburgh has a commendable record in action to mitigate the impact of high traffic flows on the village. The village has had to raise its own money for Vehicle Activated Signs for use on the A12 and B1125, and for Gateway Signs on the A12. Blythburgh has a Community Speedwatch Group, the first to be formed in Suffolk.
- 2.7.6 The EDFE proposals – for a road-led strategy - would leave Blythburgh with even higher traffic flows and one of the few communities between the M25 and Lowestoft not to be bypassed. Wrentham to the north has a light-controlled pedestrian crossing and to the south, Farnham, for example, has pedestrian refuges, but Blythburgh, where traffic on the A12 (Location W), includes that joining from the A145, A1095, and B1125 has no safe pedestrian crossings. Yet more traffic is proposed without mitigation. Using the capacity of a road as the sole criterion for the acceptance of proposals neglects the amenity of residents.
- 2.7.7 Additional noise, extending beyond the current high-traffic-flow periods, is of concern. NPS (EN-1) 5.11.4-5 requires *a prediction of how the noise environment will change with the proposed development, in the shorter term such as during the construction period and the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should also be considered.*
- 2.7.8 Blythburgh parish council's traffic data for the B1125 cannot be reconciled with the much lower figures at location L presented by EDFE [Stage 3 doc. Table 6.2].¹
- 2.7.9 EDFE show an average base-line daily two-way flow at Location L as 1650 rising to a daily peak of 2500-2550 in the road-led strategy. Blythburgh parish council's monitoring gives 1260-1665 for current northbound traffic ONLY, depending on the time of year. EDFE's flows seem to be only half what they should be. A much higher flow assumed by EDFE on the B1125 in Westleton, at Location F (2400 rising to 3500-3600) also demands explanation.

¹ Blythburgh parish council, in correspondence with EDFE, has received confirmation that traffic flows are the sum of two-way movements. The council will be meeting EDFE to discuss the significant discrepancy between its and EDFE's figures.

- 2.7.10 The project documentation includes a prediction that peak morning flows on the B1125 will increase by 27% at location L. The assumption that the B1125 can carry additional traffic [Stage 3 doc. 6.12.4] takes no account of the 100m Angel Lane bottleneck at the junction with the A12. Vehicles of SUV size and larger cannot pass one another and tailbacks are common. There is no footpath for pedestrians. (See also 2.10 below.)
- 2.7.11 Blythburgh parish council understands that the assumption of increased traffic on the B1125 is partly attributable to outages for Sizewell B (Tom McGarry presentation to parish council, 12.03.19). The council questions why this traffic cannot be instructed to use the improved routes to the site that will be provided for the SZC development.
- 2.7.12 Number recognition speed cameras should be located on the B1125 in 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. This was proposed in a traffic strategy document prepared by the parish council in 2013 and not excluded by the county council's consultants Keir MG, although a cost would be involved. The village roads should be engineered to make them unattractive for through traffic.
- 2.7.13 Fly-parking happens in Blythburgh. The prospect of it becoming a regular feature, on an increased scale, in the church car park and in Angel Lane for example, is of concern. (See 2.13.5 below).
- 2.7.14 Blythburgh parish council urges that all site traffic should use only designated routes and control measures to guarantee this should be established.
- 2.7.14 Blythburgh Parish Council is concerned that EDFE makes no reference to the monitoring of air quality associated with increased traffic flows through Blythburgh, particularly at the A12 / B1125 junction. We would urge that air quality be included in future discussions with Blythburgh parish council.

2.8 TRANSPORT: RAIL

- 2.8.1 Blythburgh parish council supports a rail-led strategy but is concerned at the pessimistic tone adopted in the Stage 3 documents. However, road improvements included in the road-led strategy should also be adopted as part of the rail-led strategy.
- 2.8.2 If EDFE go ahead with the road-led strategy, Blythburgh parish council urges that certain rail improvements included in the rail-led strategy should also be part of the road-led strategy.
- 2.8.3 The improvements should include development of the Saxmundham - Leiston branch line with automatic level crossings and necessary

upgrades to the track (Vol.1, Chapter 9, Stage 3 Consultation). 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. Repairs or replacement of existing track to freight standard and signalling upgrades are needed in some areas. This would be an important legacy development, permitting increased freight and passenger traffic during the construction and operational phases of Sizewell C.

- 2.8.4 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 .

2.9 TRANSPORT: SEA

Blythburgh parish council regrets the loss of sea transport, except for a possible beach facility. The council 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. (See 2.2.2 above.) The merits of the beach-landing facility require further consideration.

See Appendix A for discussion of the coastal infrastructure and impact on Sizewell marshes, in relation to the National Policy Statement on Energy.

2.10 TRANSPORT: PARK AND RIDE

- 2.10.1. The proposed Park and Ride at Darsham is 4½ miles south-west of Blythburgh. Blythburgh parish council acknowledges that its creation 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.

- 2.10.2 However, the full flow from the north on the A12 of HGV, bus, LGV and private car traffic generated by the project will pass through Blythburgh village. It should be noted that Blythburgh church and the village hall are on one side of the A12, and the White Hart and most of Blythburgh's

population on the other. Schoolchildren must cross the A12 to catch school buses. (See also section 2.7 above and 2.10.9.)

- 2.10.3 It is clear that 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 A1095 (to Southwold) and Hazel Lane (to Wenhaston) will increase.
- 2.10.5 The A12/A145 junction is of particular concern. Its layout is confusing and hazardous. Vehicles turning right from the A145, crossing two streams of traffic, have problems and tailbacks are common. Sizewell traffic will exacerbate these problems and the junction should be modified, possibly with a roundabout. This would have the additional benefit of reducing the speed of vehicles entering Blythburgh from the north.
- 2.10.6 The Park and Ride offers the prospect of a legacy facility of value to users of Darsham station but there is no reference to this. The provision of a roundabout to improve access is welcomed and should form part of EDFE's final submission.
- 2.10.7 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.
- 2.10.8 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.
- 2.10.9 The speed of traffic is as important as the numbers of vehicles. Blythburgh parish council's speed-monitoring data show that speeding is a particular problem early and late in the day. The council believes that the village will be exposed to danger from speeding traffic at shift changes. There is a history of vehicles leaving the road at the White Hart bend, resulting in fatalities. Protection of the properties on the east side of the A12, from the Angel Lane junction to the Blyth river bridge, is required in mitigation. (See www.eadt.co.uk 'Blythburgh, crash' reports.)
- 2.10.10 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.
- 2.10.11 Given that the Park and Ride facility offers no direct benefits to Blythburgh, and that Sizewell traffic will exacerbate existing traffic

problems, the parish council urges that these issues and proposed mitigation (see also 2.7 above) form an outline for direct discussions between EDFE and Blythburgh parish council.

See 1.12 above for a list of topics for discussion. Fig.1 below illustrates the traffic issues and proposed mitigation.

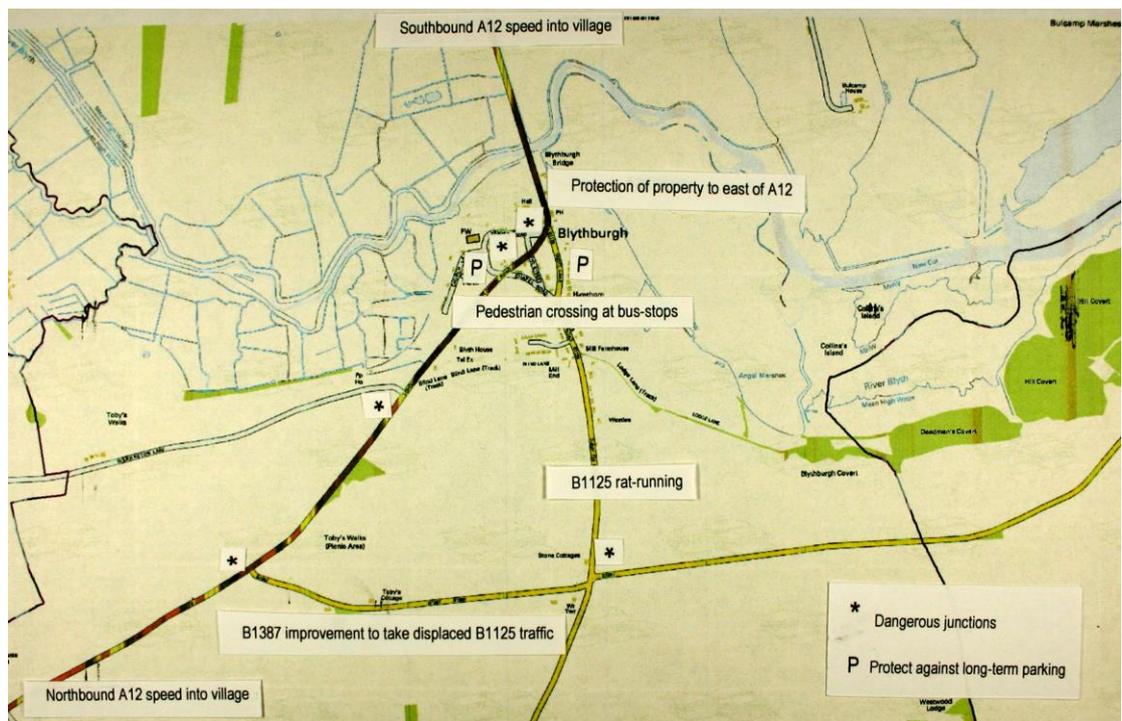


Figure 1. Blythburgh traffic issues and proposed mitigation

2.11 TRANSPORT: ROAD IMPROVEMENTS – A12

2.11.1 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.

2.11.2 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.

2.11.3 Blythburgh parish council were not convinced of the merits of a four-village bypass, in the context of the Sizewell project and support its removal from the Stage 3 proposals. The basis of this view was that a four-village bypass would deliver traffic more quickly to the potential bottleneck at Yoxford (see Section 2.12) and the large investment involved could be better spent in mitigation action elsewhere. However,

if public funding could be secured the four-village bypass could be supported.

2.11.4 Blythburgh parish council also welcomes the proposal to build bypasses for Middleton Moor and Theberton. The parish council does not have the local knowledge necessary to judge the particular routes chosen.

2.12 TRANSPORT ROAD IMPROVEMENTS – YOXFORD/B1122

2.12.1 Blythburgh parish council welcomes the proposal to build a link road from the A12 south of Yoxford. The parish council does not have the local knowledge necessary to judge the particular route chosen.

2.12.2 The connection for A12 traffic from the north to the proposed link road is also welcomed. Blythburgh parish council is concerned that the link road is not also part of the rail-led strategy. It is highly desirable as a means of bypassing Yoxford, to protect the village, the junction with the A1120, and existing users of the A12.

2.12.3 No alternative routes in the event of road blockages or emergencies 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.

2.12.4 A link road from south of Yoxford would provide a valuable legacy, of continued value during Sizewell C operation. Responses to an emergency at Sizewell would be facilitated.

2.12.5. 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.

2.13 PEOPLE AND ECONOMY

2.13.1 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,

2.13.2 Nevertheless, 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 village the White Hart, and B&Bs in the parish depend upon tourists. The church attracts thousands of visitors every year and they make a significant contribution to the cost of maintaining the fabric.

- 2.13.3 Mitigation through grant aid to enhance tourist facilities and their promotion is proposed. NPS (EN-1) 5.12.3 requires that such socio-economic impacts be addressed.
- 2.13.4 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.
- 2.13.5 Blythburgh parish council is concerned about the prospect of the village being used for fly parking by car-sharing pools. The council notes that driver-based authority to park at Sizewell is expected to reduce car-sharing. However, 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, if necessary, of parking restrictions on village roads (but minimizing the effect on residents) and financial support for the church authorities if experience shows that a barrier is needed at their car park. (See also 2.7.13 above.)
- 2.13.6 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. EDFE should partner with local schools and colleges to highlight opportunities. EDFE should seek to partner with local business suppliers where feasible.
- 2.13.7 The council is concerned at the prospect of attracting local workers for the Sizewell project, in an area of low unemployment. The employment of local tradesmen would denude existing businesses of their workforces. Residents would 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.
- 2.13.8 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.

2.13.9 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.

2.14 CONSULTATION PROCESS

2.14.1 Blythburgh parish council is concerned that its response to Stage 1 and 2 Consultation (See Appendix C) does not appear to have had any effect on proposals concerning Blythburgh. The new proposal to consult with individual parish councils, including Blythburgh, is welcomed and should be a necessary part of the process. (See 1.12 and 2.10.11 above.)

2.14.2 Blythburgh parish council is concerned at the lack of transparency in the consultation process. The responses to Stage 1 and 2 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.

2.14.3 The local exhibitions were a valuable opportunity to gain information and ask questions.

2.14.4 The provision of help from consultants from Planning Aid England was valuable; about the process of consultation and the presentation, if not the content, of responses. The consultants admitted that they lacked local knowledge.

APPENDIX A

(See Section 2.9 above.)

Coastal Infrastructure

1. There are concerns at the lack of detail provided in regard to the design of the proposed coastal infrastructure and the lack of evidence regarding potential environmental impacts.
2. We are pleased to note that the importance of the catchment area of Minsmere Old River and its tributaries has been recognised (8.11.2-3). However, the effects of these impacts of the development on coastal processes and on flooding remains the most serious concern about the proposed development. This is an area of low lying poorly protected coastline, which is already prone to serious flooding problems. The long term effects could dangerously endanger areas of international nature conservation importance, such as RSPB Minsmere, whose frontage adjoins the proposed site, as well as other International designated sites, further up the coast at Walberswick and Benacre.
3. It needs to be understood how Sizewell C might place additional pressures on this coastline and it's underlying processes. At this stage there is insufficient detail available to enable any understanding of the implications for the coast and its environs or any reference of potential mitigation options prior to the development.
4. A significantly greater level of detail is required to underpin more robust evidence (including Habitats Regulation Assessment (HRA)) of potential impacts, and a plan of any required mitigation to ensure that adverse effects on the integrity of designated sites are avoided.
5. The following are just a few of the designated sites along this part of the Suffolk coast:

The Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI)
The Minsmere to Walberswick Special Protection Area (SPA)
The Minsmere-Walberswick Heaths and Marshes Special Area of Conservation (SAC)
The Minsmere-Walberswick Heaths and Marshes Ramsar
6. These sites contain a complex mixture of habitats, including mudflats, shingle beach, reedbeds, heathland, fen and wet grazing marsh, with important birds, including breeding wetland and heathland species and wintering raptors, wildfowl and waders. It also supports scarce plants and invertebrates. While breeding and wintering bird populations, include Bittern, Marsh Harrier, Avocet, Stone Curlew, Nightjar, Woodlark and several wildfowl species.

7. We also have major concerns relating to the location and potential impacts of the proposed Beach Landing Facility (BLF), as described in paragraphs 7.5.91-98. This indicates that the BLF could form an important part of the coastal defences should the shoreline to the North retreat. If the BLF is not developed, what alternative construction will be required for landing the proposed rock armour?
8. These proposals for better harder protection here will almost certainly affect coastal processes and sediment transportation, causing an acceleration of erosion problems to the North.
9. Paragraph 7.4.79 states that there have been no significant changes to the majority of the design of the permanent Sizewell C sea defence since the Stage 2 consultation. We understand that the primary coastal defence is to be an embankment with a crest height of 10.2m AOD, with a layer of rock armour embedded within it (paragraphs 7.4.78-81). This will entail the removal of County Wildlife Site (CWS) grassland along the length of the frontage. This grassland is of high value for plants and invertebrates and migrant birds.
10. We are concerned that insufficient attention has been given to the potential seriousness of any effect on changes to erosion rates or flow patterns in this area, more research and local advice should be sort before any work is approved.
11. For a brief description of potential impacts we have to refer to the Stage 2 documentation. Paragraph 7.9.60 indicates that the primary concerns would be effects on shape and geomorphology of Sizewell Bay and longshore with paragraph 7.4.69 indicating that the BLF could act as a foreland causing the shoreline to the North to retreat. However, paragraph 7.4.68 states that the BLF will have minimal impacts on sediment processes and monitoring will be in place to ensure impacts are detected and managed. We feel this is untrue and how will this be managed ?
12. The lack of sediment processes are certainly going to impact even more on the bay between Dunwich and Walberswick increasing the risk of flooding around Walberswick harbour area, and further up steam on the Blyth Estuary including Tinkers and St Felix marshes and more importantly a much increased threat to properties in Blythburgh.
13. It is noted in paragraph 7.4.60 (Stage 2) that a landscaping scheme is proposed to reinstate coastal dune grassland following construction. It is also stated that the defence could be raised to a crest height of 14m AOD at a later stage if monitoring suggests further improvements to defences are necessary. It is concerned that planting following construction will probably not produce habitat of similar quality to that lost, also that repeated disturbance (if defences require upgrading) would cause further damage to any recovering vegetation/invertebrate populations. Given the importance of this dune grassland and the specialist species it supports, our view is that

consideration should be given to providing compensatory habitat, which should be established before work commences. The work already carried out to create wetland to the West of Sizewell B is totally inadequate and poorly designed.

14. Paragraph 7.4.12 (Stage 2) notes that the new Sizewell C sea defence embankment would be positioned further to the East than that of Sizewell B. Whilst we acknowledge that this reduces the land take for Sizewell C, the ground disturbance alone will create loss of habitat.

Sizewell Marshes SSSI

15. The Sizewell C proposals include part of Sizewell Marshes SSSI within the development site. Is there no alternative location for this expansion? The Site Assessment for Sizewell C in Vol. II of EN-6 (Annexes to the National Policy Statement for Nuclear Power Generation) states in paragraph C.8.65 that:

'The Government has also noted that there will be further assessment of any proposal for the site at project level and that EN-1 sets out detailed consideration that must be given to issues related to nationally designated sites, should an application for development consent come forward.'

16. This refers to policies set out in EN-1 (Overarching National Policy Statement for Energy). Paragraph 5.3.11 of EN-1 states:

'Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The IPC [now PINS] should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.'

17. This is essentially consistent with the policy set out in the National Planning Policy Framework with regard to SSSIs. The tests set out in paragraph 5.3.11 of EN-1 are intended to ensure that SSSIs are only damaged (i) where there is no alternative location for the development and (ii) where the benefits of development at that site clearly outweigh both the impacts on the features of the SSSI itself and any broader impacts on the national network of SSSIs. Compensation should be considered as a last resort only when it has been proven that no alternatives to the proposal exist.

18. We note that Section 14 is concerned with assessments that are subject to their own regulations and requirements. We request that further detail, supported by evidence, is provided to show that these potential impacts have been considered in relation to all statutory requirements and if necessary, mitigated. Evidence should be provided to enable understanding of the potential construction impacts, the scenarios under which these coastal protection elements would come into play, and the likely effects of this defence on ecological receptors and designated sites.

We expect to see greater detail regarding the potential environmental impacts of this, and are particularly concerned about effects on flood risk (in terms of frequency, severity, extent or duration).

19. We are concerned that the proposed defence line could act as a hard point and intensify erosion elsewhere along the frontage and to areas to the North.

APPENDIX B

MITIGATION PROPOSALS

Blythburgh parish council wishes it to be noted that the majority of its mitigation proposals are little changed from those presented in response to the Stage 2 consultation and are evidence that thus far the direct impacts on the village have not been recognized by EDFE.

SECTION IN BLYTHBURGH PARISH COUNCIL RESPONSE TO CONSULTATION	ISSUE RAISED BY BLYTHBURGH PARISH COUNCIL	MITIGATION REQUESTED BY BLYTHBURGH PARISH COUNCIL
Summary	Use of B1122 for access to construction site not feasible	Building of a new link road, with the by-passing of Yoxford, is supported.
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	Impact on communities and environment	Creation of local job opportunities at the Campus would provide some mitigation for disruption.
		Provision of legacy housing
7. Transport. Overall Strategy	Improvement of access to park and ride welcomed.	Provide legacy parking for the period of full operation and for Darsham train station users.
	Exacerbation of traffic issues in Blythburgh by vehicles using B1125	Speed cameras with number plate recognition located on the B1125 in Blythburgh B1387 from its junction with the B1125 to the A12 should be improved as an alternative route for displaced traffic Village roads should be engineered to make them unattractive to through

		traffic
	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
	Ability to monitor rat-running	Use number plate recognition system
		Maintain number recognition systems for the period of full operation of Sizewell C, NOT just during construction phase.
8. Transport Rail		
	Removing HGVs 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
	Some road improvements are not part of the rail-led strategy.	The road improvements described in the road-led strategy are also required with the rail-led strategy.
		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 on the A12 through Blythburgh	School children using the school bus must cross A12 and the provision of a pedestrian crossing or refuge is required.
	The Park & Ride could 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	<p>Safe, light controlled pedestrian crossing on the A12 within the village.</p> <p>Permanent speed cameras installed on the A12 north and south of the village.</p> <p>Barriers installed on East side of A12 between Angel Lane and the River Bridge.</p> <p>Through traffic deterred from using B1125 by speed cameras in the village.</p> <p>B1387 should be improved as an alternate route.</p>

11. Road Improvements. A12	Blythburgh parish council does not support the 4 villages by-pass.	Monies could be better spent on other mitigation measures, but alternative source of funds would be welcomed.
12. Transport. Road Improvements. Link roads.	No alternative routes specified when roads blocked or an Emergency situation.	Need to have an alternate route specified which is not the B1125 through Blythburgh. The B1125 is not capable of carrying the heavy traffic.
	No route specified, if B1122 blocked, for an Emergency on the nuclear site.	A new access road from A12 to Sizewell site will provide emergency cover and a legacy facility.
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 about fly parking by car share pools to the Sizewell site during both construction and operation will impact on residents, functions and organisations e.g. Aldeburgh Festival.	Parking restrictions on village roads and, if necessary, mitigation against use of free car parking areas.
	Businesses damaged and 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	Buses to pick up along the route to Sizewell. Mini-bus shuttle service to park & ride. 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	Concerns of individual consultees.	Discussions with individual parishes, including Blythburgh, is a necessary part of a robust consultation process and 'promised' in the Stage 3 consultation document.

APPENDIX C

given as Appendix 4 in Stage 4 Consultation response.