

your ref Project EN010012
our ref Sizewell C
please ask for Lisa Evans
direct dial 01473 432915
email development.management@ipswich.gov.uk



Michele Gregory
The Planning Inspectorate
National Infrastructure Team
Temple Quay House
2 The Square
Bristol, BS1 6PN

Grafton House
15-17 Russell Road
Ipswich Suffolk
IP1 2DE

www.ipswich.gov.uk

BY EMAIL ONLY to SizewellC@planinginspectorate.gov.uk

8th June 2020

Dear Michele,

ADEQUACY OF CONSULTATION REQUEST - EN010012

APPLICATION BY NNB NUCLEAR GENERATION (SZC) LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR A NEW NUCLEAR POWER STATION DEVELOPMENT AT SIZEWELL IN SUFFOLK (SIZEWELL C)

Thank you for your letter dated 27th May 2020, providing Ipswich Borough Council (IBC) with the opportunity to confirm whether, in progressing the scheme, the applicant has complied with the following duties:

- Duty to consult – Planning Act 2008 (as amended) (PA2008) – Section 42
- Duty to consult the local community – PA2008 – Section 47
- Duty to publicise – PA2008 - Section 48

Duty to consult - Section 42

IBC were provided the opportunity to comment on four Stages of statutory consultation under Section 42 of the Planning Act.

- Stage 1 – consultation ran between 21st Nov to 6th Feb 2013
- Stage 2 - consultation ran between 23rd Nov to 3rd Feb 2016
- Stage 3 - consultation ran between 4th Jan to 29th Mar 2019
- Stage 4 - consultation ran between 18th July to 27th Sept 2019

IBC are content that sufficient consultation has been undertaken in relation to the four Stages of consultation.

However, a number of concerns IBC raised in response to Stages 2, 3 and 4 have not been adequately addressed by the applicant. IBC's concerns are set out at the formal consultation responses provided at Appendices A to C of this letter.

Duty to consult the local community - Section 47

IBC was not consulted on the Statement of Community Involvement (SoCC).

Duty to publicise - Section 48

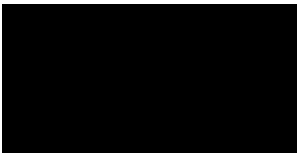
IBC has no comments to make in relation to the applicant's compliance with Section 48 of the Planning Act 2008

Summary

Overall, IBC considers that the applicant has generally complied with its duties under Sections 42, 47 and 48 of the Planning Act 2008.

If you require further information or clarification on any matter in this letter, please contact Lisa Evans, Principal Planning Officer (Special Projects) using the contact details at the top of the letter.

Yours sincerely



Martyn Fulcher MRTPI
Head of Development

Appendices

- A: Stage 2 formal consultation response
- B: Stage 3 formal consultation response
- C: Stage 4 formal consultation response

Consultation Questionnaire

Sizewell C Proposed
Nuclear
Development
Stage 2 Pre-Application Consultation
Autumn/Winter 2016



Welcome

Welcome to EDF Energy's **Stage 2** Consultation on proposals for a new nuclear power station at Sizewell C and associated development. Feedback from our Stage 1 Consultation, which ran from November 2012 to February 2013, along with further technical and environmental work, has helped shape the proposals presented at this Stage 2 Consultation. Some proposals have been narrowed down whilst others still have a number of options - you are being invited to provide your feedback on all aspects of our strategies and proposals.

This questionnaire has been designed to be answered having read the information in our Stage 2 Consultation Summary Document', which is available in hard copy and on disc at:

- consultation exhibitions
- Sizewell C Information Office, 48-50 High Street, Leiston IP16 4EW
- the Council offices of Suffolk County, Suffolk Coastal District, Waveney District and Ipswich Borough
- a number of local libraries

Or you can read the consultation documents - including the Stage 2 Consultation Document and Stage 2 Consultation Summary Document - and answer the questionnaire online: www.sizewellc.co.uk.

This questionnaire encourages feedback on our proposals, including specific options. You are welcome to answer as many or as few of the questions as you like. Alternatively, if you would prefer to provide an overall comment, please just answer Question 1.

Please note you can also provide your feedback by writing to us. You do not need to submit a completed questionnaire as your official response.

To return this questionnaire, or any other written response, please send it to **FREEPOST SZC CONSULTATION** (no stamp or further address required).

All comments for the Stage 2 Consultation need to be received by 3 February 2017.

Respond to the consultation:

Complete a questionnaire:

Online www.sizewellc.co.uk

Or in hard copy and post it to our freepost address (*see below*)

Email your comments to

info@sizewellc.co.uk

Post your written responses to

FREEPOST SZC Consultation

(*no stamp or further address required*)

Call our freephone number **0800 197 6102** during normal office hours.

1. Sizewell C Proposals: Overall

The Government has identified a need for new nuclear power stations to be built as part of its plans for maintaining security of energy supply as Britain moves to a low carbon economy. Sizewell is one of the sites identified by the Government as potentially suitable for a new nuclear power station following a process of public consultation and debate.

EDF Energy is developing proposals to build and operate a new nuclear power station, comprising two UK EPR™ reactor units. The proposals include associated development required to support the construction of Sizewell C, such as an accommodation campus for workers, park and ride facilities, rail and sea infrastructure and road improvements. **What are your overall views on EDF Energy's proposals to build a new nuclear power station, Sizewell C, and associated development?**

Thank you for consulting Ipswich Borough Council on your Stage 2 Pre-application consultation on Sizewell C. It is useful to see that when finished it will be supply electricity for 6 million or approximately 20% of Britain's homes. The potential for supply chain opportunities, training and jobs is welcomed and it is hoped that Ipswich is able to benefit appropriately.

It is also useful to see the emphasis on EDF finding a sea or rail maximized option which is both more sustainable and also aims to take the pressure off the road network.

It is disappointing that Ipswich is not included in the construction worker residential sector tables as we believe that it has much to offer in terms of access to higher skilled staff linked to the new university as well as good residential and tourism accommodation through its public transport links.

We feel that Ipswich's position mean that we could offer a perfect location for a headquarters building that is well connected to London as well as being equidistant between Sizewell and Bradwell thus offering the perfect position for a combined EDF office facility. However, the impact on the local rental sector in Ipswich will have to be carefully managed as the rental sector is already in high demand and prices are the highest in the area when measured against local incomes. Workforce predictions are higher in this Stage of consultation than were anticipated in Stage 1. What assurances are there that these figures are more reliable?

It is also noted that much of the strategic workstream work is on-going eg on a more detailed travel plan, and helipad plans which are currently unavailable. This makes it difficult to comment other than at a high strategic level. There is not enough consideration of green options to minimize impact.

2. Main Development Site: Environment

Section 3, Sizewell C Power Station

A range of potential impacts on the environment may arise as a result of the construction and operation of the power station including landscape and visual impact, historic environment, noise, lighting, air quality, footpaths and bridleways, flood risk assessment, ecology and coastal processes. Information on environmental assessments and mitigation proposals as known at this stage are identified in the Consultation Summary Document and Stage 2 Consultation Document. **What are your views on the potential environmental impacts and proposed mitigation at the main development site?**

Because Ipswich Borough is not adjacent to the site, the landscape and visual impact, impact on historic assets and ecology, noise, lighting and footpaths and bridleways is more for others to comment on.

It is not clear how EDF plan to use clean energy in terms of Sizewell associated transport flows. For example, what are the green credentials of the pick-up vehicles from rail stations and the buses serving the Park and Ride sites? How is EDF trying to reduce CO2 emissions given the volume of construction traffic anticipated and construction worker flows? The model assumes no walking, cycling or motorbike travel by workers to either the main construction site or the park and ride sites. But elsewhere it is said that you wish to encourage it. It is also not clear what impact moving the helipad site to the south will have for Ipswich. What flight paths will be used? Are any regular night flights planned and how often will flights be taking place?

Support the fact no additional overhead line circuits 'should be required' for Sizewell C in the vicinity of the site. But have no information on the overhead line connection which will be confirmed by further studies. However, support that these will be undergrounded to minimize the impact on the landscape.

3. Main Development Site: New Access Road

Section 3, Sizewell C Power Station

We are proposing to build a new, permanent access road to link Sizewell C to the B1122. This would be the main route to bring workers and materials onto the site during construction and the main access for Sizewell C once the station is operational.

The new access road would need to cross the Sizewell Marshes Site of Special Scientific Interest (SSSI) and we are considering four options.

Option 1: Causeway over culvert

A temporary, lower level causeway that would be built up to form the permanent higher level causeway.

Do you think this option is: appropriate inappropriate don't know

Option 2: Single span bridges

A short-term bridge that would operate until a temporary, single span bridge is built during construction. A permanent single span bridge would operate alongside the temporary bridge during construction and be retained during operation of the power station.

Do you think this option is: appropriate inappropriate don't know

Option 3: Three span bridges

As option 2, but with a three span rather than single span bridge, which would require slightly less land.

Do you think this option is: appropriate inappropriate don't know

Option 4: Causeway over culvert with adjacent short-term bridge

A short-term bridge, removed part way through construction, would be replaced by a permanent causeway for the remainder of construction and throughout operation.

Do you think this option is: appropriate inappropriate don't know

Please explain your views.

This is something for local people and Suffolk Coastal District Council to decide.

4. Main Development Site: Managing Construction Materials

Section 3, Sizewell C Power Station

To reduce the need to transport large quantities of materials out of the site during construction, we are proposing to take construction material for use in building the power station from one or more 'borrow pits'. This land would be backfilled with excavated peat and clay. The excavated and backfill material would need to be stockpiled at different points in the construction phase.

15 hectares of land would be required. Three potential field combinations are proposed for the borrow pits:

Option 1: Field east of Eastbridge Road (field 1) and west of Eastbridge Road (field 2)

Do you think this option is: appropriate inappropriate don't know

Option 2: Field west of Eastbridge Road (field 2) and north of Ash Wood (field 3)

Do you think this option is: appropriate inappropriate don't know

Option 3: Field north of Ash Wood (field 3) and west of Ash Wood (field 4)

Do you think this option is: appropriate inappropriate don't know

Field locations are shown in Fig 3.10: Indicative construction masterplan on page 15 of the Stage 2 Consultation Summary Document.

Please explain your views.

This is something for local people and Suffolk Coastal District Council to decide.
However, the Council would like to see as little as possible of construction materials leave the site in order to minimize the negative impacts of Sizewell C.

5. Accommodation: Overall Strategy

Section 4, People and Economy and Section 5, Accommodation and Transport

During the peak construction phase we anticipate about 36% of the construction workforce would live at home (home-based), with the rest requiring temporary accommodation in the area (non-home-based).

To accommodate some of the non-home-based workforce, we are proposing a 2,400 bed campus at the main development site and temporary caravan park on land to the east of the Eastlands Industrial Estate. We anticipate the remaining workers would live in private rented or tourist accommodation, or would buy a home locally.

To help avoid potential adverse effects on the local letting market and tourism sector, we are proposing to set up an accommodation office to help match workers with suitable accommodation.

What are your views on our overall accommodation strategy for home-based and non-home-based workers?

The Council do not consider that construction workers will want to spend most of their time in the campus as suggested in the sentence '*It also assumes that campus based staff will not do as many trips because of the facilities level at the Campus.*' As the campus facilities appear to be limited and it is expected that a large number of staff will use facilities off site, the economic impact of the construction workers needs to be better understood.

There is also a lack of information around the level of construction workers who will be housed in the temporary caravan site and what level of facilities will be offered on this site.

The Council would wish Ipswich to be included in the accommodation construction worker residential sector tables as currently it does not appear. This has potential to provide a positive impact on the local economy, although it will need to be carefully managed to ensure that it doesn't put undue pressure on already limited rental accommodation availability in Ipswich. The Ipswich rental sector is already the most expensive in the area in comparison to local wages. (2012 Strategic Market Housing Assessment).

The campus is larger in scale than a military base but it is appreciated that it is designed to limit the impact on the rural area and potential adverse effects on local letting and the tourism sector. It may be that more smaller campuses would limit their impact.

As much use should be made of a 'live at home' workforce as can be accommodated to limit the impact of bringing construction workers into the area. This will help reduce the impact of the proposal.

6. Accommodation: Campus Layout

Section 5, Accommodation and Transport

We are considering two main layout options for the accommodation campus, which is sited within the main development site. Option 2 has sub-options (i and ii) relating to the location of the sports facilities as follows:

Option 1: East and west of Eastbridge Road

Three storey accommodation buildings to the west and four storey accommodation buildings to the east of Eastbridge Road, diversion of Eastbridge Road and sports facilities to the west of Eastbridge Road.

Do you think this option is: appropriate inappropriate don't know

Option 2(P East of Eastbridge Road - with sports facilities to the west of Eastbridge Road

Three, four and five storey accommodation buildings to the east of Eastbridge Road. Eastbridge Road would remain in use with a new link into the main development site roundabout, with sports facilities in a similar location to those proposed for Option 1.

Do you think this option is: appropriate inappropriate don't know

Option 2(ii): East of Eastbridge Road - with sports facilities located remotely

As per Option 2(i), except that the sports facilities would be located elsewhere in the local area (on a site to be identified).

Do you think this option is: appropriate inappropriate don't know

Please explain your views. Please provide any thoughts on your preferred location for the sports facilities if we pursue Option 2(ii).

This is something for local people and Suffolk Coastal District Council to decide. However, Ipswich Borough Council members are concerned about the size of the proposed campus and would also like to ensure that any leisure facilities are located in a location which best serves local residents in the longer term.

7. Transport: Overall Strategy

To reduce the volume of freight that would be delivered by road, both sea and rail transport would play a major role in the movement of materials on and off the main development site.

We are also proposing park and ride facilities, a postal consolidation facility and an accommodation campus to further reduce traffic impacts on local roads ([see questions 6 and 10](#)). We are no longer proposing a lorry management facility as we now consider this can be effectively managed through other means. What are your views on our overall transport strategy?

The Council would prefer to see investment in the East Suffolk railway line for example, additional services with limited stops rather than large park and ride sites which is a more sustainable option or a combination of the two with smaller park and ride facilities. This would encourage greater use of the East Suffolk line by construction workers. This investment would also better serve residents in the longer term. It is considered that greater emphasis therefore should be placed on the potential for additional services to be provided between Ipswich and Saxmundham. In addition, more should be done to encourage better use of the East Suffolk railway line through re-introducing the two way track between Woodbridge and Saxmundham. This will speed up travel times and lead to more construction workers using the line to get to work.

It is not clear if EDF has factored in the Government changes regarding rail infrastructure that are planned ie the new shared responsibility between rail operators and Network Rail and the implications of the newly awarded rail franchise.

The proposed lorry management services and the enforcement of the parking permit system is not fully developed yet but we would ask that these are robust. The 'campus' approach has not been trialed in Suffolk before and needs very careful consideration in its approach, assumptions and development.

At peak construction they estimate up to 350-400 daily bus services (175 to 200 return journeys) – combining park and ride and direct bus movements. The traffic model assumes that 200 workers could travel to and from the construction site by direct bus from Lowestoft and Ipswich although it is admitted that this is likely to be a conservative estimate. This needs to be robustly addressed to avoid detriment and congestion issues. The commitment to provide a connecting bus service both at Saxmundham and Darsham for workers wishing to use rail for at least part of their commuting journey is supported. Both these towns are a similar distance from the construction site as well as being a similar distance from the opposite ends of the East Suffolk line (22 miles from Ipswich and Lowestoft respectively). We anticipate that flows of commuters to the site will be heaviest from the Southern end as Ipswich is roughly twice the size of Lowestoft as well as being a convenient interchange with frequent services to/from London, Chelmsford and Colchester. However, greater emphasis therefore should be placed on the potential for additional train services to be provided between Ipswich and Saxmundham.

The railway network in particular the East Coast Suffolk line does not benefit from legacy as much as it could in these proposals. The Council considers that it is important to restore the which currently slows down travel time as currently trains have to wait by the signal as there is only capacity for one train to travel on the line at this pinch point.

The impact of the additional traffic may have been underestimated as the more detailed May and August studies missed out the festival season in July. For example, excluding day visitors, the Latitude Festival at Henham just off the A12 had 10,000 campers over 4 days. The area also has other large festivals such as the Folk Festival East and the Aldeburgh Festival.

8. Transport: Rail

Section 5, Accommodation and Transport

Rail would play an important role in delivering freight to site during the construction phase. During the early stage of construction we are proposing to use an existing rail terminal south of King George's Avenue in Leiston ('Sizewell Halt') to support some rail deliveries.

There are two options we are considering to further increase our ability to use rail during the construction of Sizewell C:

Option 1: Temporary rail extension

Extending the existing Saxmundham-Leiston branch into the construction site to bring freight directly into the construction areas, removing the need for additional HGV trips on Lover's Lane.

Do you think this option is: appropriate inappropriate don't know

Option 2: A new, temporary rail terminal

Building a new, larger rail terminal and freight laydown east of Eastlands Industrial Estate with material being taken by road from the terminal to the main development site.

Do you think this option is: appropriate inappropriate don't know

Please explain your views.

A detailed response to the options to improve rail facilities for freight delivery is a matter for Suffolk Coastal District Council and local people.

However, it is supported that EDF plan to move bulk materials and containerised goods by sea or rail on and off the main development site where practicable or cost effective. A single freight train could remove about 50 HGV's from the road network and therefore has potential to reduce the level of congestion on the wider road network. However, it is not clear where the freight will be coming from and how this will impact on the Borough's road and rail network, specifically on the already congested section of the A14 around the Orwell Bridge. This could also potentially include radio-active material in the later de-commissioning of the site.

At this stage, the consultation is considering whether a rail or sea maximized approach is to be taken. It is therefore not clear how freight will impact on the rail services passing through Ipswich both for passengers and existing rail freight services passing through Ipswich to the Port of Felixtowe.

It is clear that large volumes of bulk and other materials plan to be delivered to the development site. (4.5 million tonnes of materials for the main construction of the power station and 3 million tonnes for the civil works.) Material quantities are only provisional but estimates at this stage consider that an additional 2.5 million tonnes would be required. This adds an additional level of uncertainty. In addition there will also be a high level of excavated material (estimated to be 6.5 million tonnes). It is not clear how much will be stored on-site in borrow pits and how much of the excavated material will be exported off-site.

9. Transport: Sea

Section 5, Accommodation and Transport

As part of our transport strategy to reduce the number of HGV movements on the local road network associated with the development of Sizewell C, we are looking at three options for transporting material directly to the site by sea during construction.

Both jetty options (Option 1 and 2) would be removed at the end of the construction period. The beach landing facility (Option 3) would remain for occasional use during the operation of the power station; this proposed use during operation would exist even if it is not chosen for use during construction. [If you wish to comment on the use of the beach landing facility during operation, please respond in question 1.](#)

Option 1: Wide jetty (temporary)

This would handle abnormally large and other cargo deliveries and bulk materials such as aggregates and soil/clay excavated from the site.

Do you think this option is: appropriate inappropriate don't know

Option 2: Narrow jetty (temporary)

This would handle abnormally large and other cargo deliveries but not bulk materials.

Do you think this option is: appropriate inappropriate don't know

Option 3: Beach landing facility (for use during construction phase)

The beach landing facility would be suitable for handling abnormally large and other cargo deliveries but could not be used to move bulk materials. Should this option not be taken forward we are still proposing a beach landing facility for occasional use during the operation of the power station.

Do you think this option is: appropriate inappropriate don't know

Please explain your views.

Option 1 provides the greatest potential for sea movements and reduces the impact of freight traffic and HGV's on the wider rail and highway network.

10. Transport: Park and Ride

Section 5, Accommodation and Transport

We are proposing two park and ride facilities at key locations on the A12 to enable workers to travel by bus rather than private car to the Sizewell C site, one to capture traffic coming from the north, and one to capture traffic coming from the south.

Please note that two sites - rather than options - are proposed. We welcome your feedback on either or both of the sites.

Southern park and ride - Wickham Market

Our preferred site for the southern park and ride is north of Wickham Market in the parish of Hacheston.

Do you think this site is: appropriate inappropriate don't know

Northern park and ride - Darsham

Our preferred site for the northern park and ride is at Darsham, close to the railway station

Do you think this site is: appropriate inappropriate don't know

Please explain your views.

See response to question 7

11. Transport: Road Improvements – A12

Section 5, Accommodation and Transport

Sizewell C construction traffic may result in the need to provide mitigation at Farnham to improve traffic flow and safety through the narrow bend.

We are considering four main options - option 3 has two versions (A and B) relating to where the bypass connects to the A12:

Option 1: No change

The potential use of minor mitigation measures for nearby properties only. The relatively limited increase in traffic along the A12 due to Sizewell C may not justify significant mitigations at Farnham.

Do you think this option is: appropriate inappropriate don't know

Option 2: Farnham bend road widening

Widening of the road at Farnham bend, including the demolition of the Grade II listed Post Office Stores building that is sited on the bend.

Do you think this option is: appropriate inappropriate don't know

Option 3fi Farnham bypass (a one-village bypass) - Sweffling Road junction

A single village bypass around Farnham, joining the A12 at Sweffling Road at a signalised junction.

Do you think this option is: appropriate inappropriate don't know

Option 3B: Farnham bypass (a one-village bypass) - south-west T-junction

A single village bypass around Farnham, joining the A12 at the south-western end at a T-junction.

Do you think this option is: appropriate inappropriate don't know

Option 4: Farnham and Stratford St Andrew bypass (a two village bypass)

Suffolk County Council's proposal for a bypass around the villages of Farnham and Stratford St Andrew.

Do you think this option is: appropriate inappropriate don't know

Please explain your views.

The Borough Council supports any measure which will improve traffic flows on the A12 which is a key transport link to Ipswich.

12. Transport: Road Improvements - Yoxford / B1122

Section 5, Accommodation and Transport

The B1122 would experience a significant increase in traffic as a result of Sizewell C. We have identified a number of potential mitigation measure along the stretch including Yoxford and Theberton to improve road safety such as junction improvements, a speed limit reduction, pedestrian enhancements and improvements to the road alignment.

In relation to the junction of the B1122/A12 at Yoxford we have identified some specific options:

Option 1: Roundabout

Do you think this option is: appropriate inappropriate don't know

Option 2: Signalised junction

Do you think this option is: appropriate inappropriate don't know

Please provide comments on all our proposed B1122 road improvements, including explanation of your views on the options provided.

This is a matter for local people; however the Council supports measures that improve pedestrian and vehicular safety.

We have also identified a number of other potential mitigation measures:

Speed limit reductions on the B1122 — 40mph, reducing to 30mph on the approach to the main development site entrance.

- Improvement to the B1122 to the west of the junction with Mill Street, near Middleton Moor to improve forward visibility for traffic on the B1122 and help traffic exiting Mill Street.

Two proposals for pedestrian enhancement in Theberton:

- a pedestrian crossing and footpath near Pump Cottages; and
- a pedestrian path and crossing enhancement in the vicinity of the Church of St Peter, Theberton.

Improvement to the alignment of the B1122 between Theberton and the main development site entrance to improve forward visibility.

13. People and Economy

Section 4, People and Economy

We are keen to ensure that local communities and businesses are able to make the most of the opportunities arising from Sizewell C, while potential adverse impacts on the area are limited.

Do you have any comments on our people and economy proposals, including our approach to education, training and local supply chain opportunities?

The Council is keen that local Ipswich businesses benefit from training and support to maximize supply chain opportunities.

It is imperative that the marketplace website is used effectively and that local businesses are given every opportunity to bid for contracts or offered the opportunity to work as a co-operative to give the advantage of economies of scale that wouldn't be otherwise available to them.

The Council is also keen to see appropriate links made with the University of Suffolk as part of the current and longer term legacy plans.

The Council supports the work that is ongoing with SCC and NALP in relation to the Construction and Energy Sector Skills Plans and would expect EDF to work within these frameworks to source and train local staff wherever possible.

14. Consultation Process

Section 1, The Consultation

EDF Energy has committed to undertaking three stages of pre-application consultation to inform its proposals for new nuclear build at Sizewell C and associated development to enable its construction.

For the Stage 2 Consultation, we have produced two main documents; a consultation document containing technical information and a summary document. We have also provided other supporting material including Computer Generated Images (CGIs) and a model. We are holding a number of public meetings and exhibitions, and also hosting a consultation website.

Please let us know if you have any comments or suggestions about the consultation process.

The CGI's are a little misleading as they do not include the fencing or sea defences in long views.

Staff manning the public exhibitions are helpful and open.

However, it is disappointing that so much of the technical information required to formulate informed views has been hindered by strategic work streams that are still on-going. The danger of this approach is that views expressed may not be as reliable as when additional information is available. It is important that this point is made in your consultation statement accompanying the planning application to the Planning Inspectorate.

Feedback

Name Sally Minns

Are you responding on behalf of an organisation?

yes

☒ no

If so, which? Ipswich Borough Council

Job title: Senior Planning Officer

Ipswich Borough
Council,
Grafton House,
15-17 Russell Road,
Ipswich
IP1 2DE

Email: sally.minns@ipswich.gov.uk

Disclaimer: Your personal details (if you provide any) will be held securely by EDF Energy and its consultants in accordance with the Data Protection Act 1998, and will be used solely in connection with the consultation process and subsequent planning applications. Your response may be published as part of our consultation programme (including any personal details if included in the response). We will not otherwise publish personal details or publicly attribute a response to an identified individual. Except as noted below, your personal details will not be passed to any third parties. Your response could be made available (with your personal details) in due course to the relevant planning or local authority or government body so they take it into account. Although not directly within our control, we will request that your personal details are not made publicly available by them and in any event they will be required to comply with the Data Protection Act 1998 when using your personal data.

By completing this questionnaire you confirm you have read and accept this Privacy notice.

If you need help to understand this information in another language please call [0800 197 6102](tel:08001976102).

Portuguese

Se precisar de ajuda para ler estas informagOes em outra lingua, por favor telefone para o numero abaixo [0800 197 6102](tel:08001976102).

Polish

Jeieli potrzebujesz pomocy w zrozumieniu tych informacji w swoim jezyku zaadzwori na podany poniiej numer [0800 197 6102](tel:08001976102).

Bengali

Z"40

Zkr`C T4r`C7 b1"l

CP1^1 771 [0800 197 6102](tel:08001976102).

Lithuanian

Jeigu jums reikia sios informacijos kita kalba, paskambinkite [0800 197 6102](tel:08001976102).

Romanian

Daca aveti nevoie de ajutor pentru a intelege aceasta informatie intr-o alts limbs, va rugam sa telefonati la numarul [0800 197 6102](tel:08001976102).

If you would like this information in another format, including audio or large print, please call [0800 197 6102](tel:08001976102).

edfenergy.com

EDF Energy Ltd 40 Grosvenor Place London SW1X 7EN

Registered in England and Wales. Company registration number 2366852

© Copyright EDF Energy All rights reserved 2016



Ipswich Borough Council's Response to Sizewell C Third Round Consultation

Introduction:

This is the consultation response to the Third Round undertaken by EDF Energy. Ipswich Borough Council have reviewed the questions posed within the questionnaire and have responded to those elements which affect Ipswich. Those matters that have not been commented upon within this document are deferred to others who are more appropriately placed to respond.

This response should be read alongside IBCs Stage 2 consultation response (Jan 2017) as a number of those matters raised within said response remain applicable.

Summary of Ipswich Borough Council's response to the Third Round of Consultation:

1. Of the two strategies proposed IBC would strongly encourage the use of a Rail-led transport strategy, as a more sustainable way of getting construction materials to site.
2. The DCO application must have proper regards to the proposed development of 3,500 dwellings at Ipswich Garden Suburb, with particular reference being made to potential added noise and disturbance to existing and future occupants, the need for level crossing improvements at Westerfield Station, and the retention of the public right of way and installation of a foot/cycle bridge, rather than a permanent diversion.

3. The Ipswich housing market needs to be part of the Accommodation Strategy that is being considered by EDF and should form part of the DCO submission, both in terms of the impact on the Ipswich rental market, and the likely need for workers who may be living in Ipswich.
4. The information contained within the Consultation contains limited detail to fully justify why the marine-led strategy is no longer being pursued as an option.
5. Impact upon Ipswich's air quality needs full consideration as part of the DCO process including in the EIA, and necessary mitigation such as low emission bus transfers for staff from Ipswich/Westerfield Railway Stations.
6. The ES should have proper regard to the proposed development of 3,500 dwellings at Ipswich Garden Suburb, including traffic implications.
7. Further information is required on the diversion strategy for HGVs and LGVs should the Orwell Bridge be closed at any time and for any reason.
8. Impacts upon Ipswich's road network and air quality needs to be assessed in the ES for all vehicular movements (HGVs, LGVs, Buses, Cars).

Question 1. Sizewell C Proposals: Overall

IBC having reviewed the information contained within the Third Round consultation and, as set out in the Stage 2 consultation response, continue to see the opportunities that the development of Sizewell C could potentially provide to Ipswich with the potential for supply chain opportunities, training and jobs.

However, IBC is disappointed that this consultation has still not identified or recognised what Ipswich has to offer the project with access to higher skilled staff linked to the new university as well as good residential and tourism accommodation through its public transport links. Furthermore, Ipswich has still not formed part of the accommodation strategy.

Whilst there are potential benefits from the project, there is also the potential for significant adverse impacts that need to be fully assessed as the project develops and should be contained within the DCO and assessed within the accompanying Environmental Statement.

These adverse impacts include the impact on the local private sector rental market within Ipswich, which will have to be carefully managed as the rental sector is already in high demand and prices are the highest in the area when measured against local incomes. At this time the level of workforce is unknown and should this be higher than forecast, pressure could be placed upon Ipswich's private sector rental market and affect existing and future residents should landlord's choose to offer their accommodation to the Sizewell C workforce at a higher rent.

The development of the road and rail led strategies raise wider concerns on the impact upon the local road network and air quality within Ipswich and the ES must fully assess these impacts.

Also, both strategies have failed to have full regard to the implications of the development upon IBC's Strategic Housing allocation of 3,500 dwellings on the Ipswich Garden Suburb (IGS) and IBC have more specific concerns on the proposed closure and diversion of the Westerfield Level Crossing where the IGS has a proposed pedestrian and cycle bridge to replace this at-grade crossing. Furthermore, the construction of the IGS will be alongside the construction of Sizewell C and it is unlikely that there will be a northern relief road available for use. This has not been considered as part of the PEI.

Question 3. People and Economy:

IBC continue to reiterate the comments made to the Stage 2 Consultation response. IBC is keen that local Ipswich businesses benefit from training and support to maximise supply chain opportunities. It is imperative that the marketplace website is used effectively and that local businesses are given every opportunity to bid for contracts or offered the opportunity to work as a co-operative to give the advantage of economies of scale that would not otherwise be available to them.

IBC is also keen to see appropriate links made with the University of Suffolk as part of the current and longer-term legacy plans. The Council supports the work that is ongoing with SCC and NALEP in relation to the Construction and Energy Sector Skills Plans and would expect EDF to work within these frameworks to source and train local staff wherever possible.

Question 4. Accommodation: Overall Strategy:

IBC are disappointed that Ipswich has again not formed part of the accommodation strategy. At this time the workforce has only been estimated and it is unclear what the strategy is should this forecast be underestimated.

The Ipswich housing market needs to form part of the accommodation strategy and should form part of the DCO submission. This submission must also consider the potential impacts the demand of accommodation in Ipswich would have upon its rental market as well as the likely need for workers who may already be living in Ipswich.

As set out in response to Question 1 above, Ipswich already has the highest rents against local wages in the area. If extra demand is placed upon the private sector rental market as a result of this development private landlords could choose to offer their accommodation at a higher rent to the workforce of Sizewell, thus having an adverse impact upon both existing and future residents of Ipswich.

Question 6. Transport: Movement of Materials:

The information contained within this third round consultation documentation contains limited detail to fully justify why the marine-led strategy is no longer being pursued as an option. This option needs to be fully explored before it should be discounted.

Of the two strategies that have been proposed within this Third round of consultation IBC would strongly encourage the use of a Rail-led transport strategy, as this is a more sustainable way of getting construction materials to site.

IBC do however have concerns over both of the strategies proposed and these concerns are set out under the relevant questions below.

Question 10. Transport: Level Crossings (Rail-Led):

This Third Consultation has developed the rail-led strategy. IBC strongly encourages the use of this more sustainable mode of transportation but there are concerns with the development of the strategy to date.

Of a wider concern to IBC is the impact this would have upon existing and future residents of Ipswich as a result of the running of the additional freight trains outside of normal hours that could lead to adverse impacts on residential amenities by both noise and vibration given these would be run at unsociable hours.

The strategy is limited in its details on the movement of materials and has not made reference to the Felixstowe Line. Should materials come from abroad and travel via Felixstowe it has not been assessed what impact this would have upon this line, particularly as certain parts are only single track.

Of particular importance, for Ipswich is the impact the rail led strategy has upon IBC's strategic housing site at the Ipswich Garden Suburb. A sustainable urban extension of 3,500 dwellings with supporting infrastructure. This consultation has failed to have proper regard to the development within the preliminary impact assessment.

The Rail Led Strategy proposes:-

- a) Diversion of Public Footpath in Westerfield which crosses at grade over the railway line. Three options for diverted routes of the PRow are proposed all involve the permanent closure of the at grade pedestrian crossing and diverting the existing footpath to Westerfield Road to enable the crossing of the line at Westerfield level crossing (vehicular).
- b) Upgrade of the level crossing at Westerfield Rail Station from Automated half barrier to Manual Control Barrier and CCTV.
- c) At peak construction an additional 5 trains per day are expected on the East Suffolk Line which runs through Westerfield Station.

It is stated that the improvements to the line are intended to be retained following completion.

Ipswich Garden Suburb is a policy allocation for up to 3,500 dwellings in Ipswich. The allocation site is located either side of the East Suffolk railway line which runs through Westerfield. As part of the infrastructure requirements for the housing allocation a cycle and pedestrian bridge has been proposed to replace the at grade public footpath over the railway line. Ipswich Garden Suburb is intended to be highly sustainable and includes a number of services and facilities within the allocation to limit external car journeys. Such provision includes primary schools, a secondary school, a Country Park and retail. As such, there is a heavy emphasis on promoting access by pedestrian /cycle users through the site, which includes providing safe routes over the railway line. In addition, the close proximity of Westerfield Railway station to IGS provides further opportunities for sustainable travel by residents which needs to be promoted. Easy and direct Access to the station by residents is therefore of key importance.

Currently 133 trains per day passing through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion – the total additional movements on this part of the line in the future could be substantial. The EIA's undertaken for the IGS developments have taken in to account the additional freight trains associated with Felixstowe Port only.

The implications of additional trains on this part of line to IGS are as follows:-

- Noise & Vibration - Impact of additional trains on current and future residents of IGS;
- Air Quality - Impact of additional trains and delayed traffic at level crossing on future residents of IGS
- Traffic – The impacts of more frequent and/or longer level crossing closures on traffic delays and congestion on the local highway;
- Pedestrian / Cycle access – due to the diversion of the public footpath, more frequent closures of the level crossing and subsequent decrease in accessibility to Westerfield Station for IGS residents.

The ES accompanying the DCO needs to ensure that these impacts are fully assessed.

More importantly there are a number of concerns which are raised by the proposals with regards to the Ipswich Garden Suburb development which include the following:-

- a) Diversion of the Westerfield public footpath would undermine the IGS proposals to construct a bridge. A bridge would offer safer, more direct and easy access for pedestrians and cyclists, when compared to the proposed diverted routes. The increase in train movements would further justify the need for the pedestrian and cycle bridge.

- b) Delays experienced by potential passengers trying to access Westerfield station as a result of more frequent and longer level crossing closures at Westerfield.
- c) Delays to traffic as a result of more frequent and longer level crossing closures at Westerfield and subsequent, noise, air quality implications for residents as a result.
- d) Concerns with the suitability and quality of access which could be achieved by the proposed diversion routes. All diverted route options lead to Westerfield Road where the pavement area needs to be improved/widened to ensure safe access. There are safety implications for increased pedestrians/cyclists using the level crossing and potential conflict with traffic. All diversion routes include a link through the Network Rail compound south of the railway line. Consideration as to how safe, accessible routes will be achieved via this area of operational land.

The proposed closure of the Westerfield Level Crossing appears to have had no regard to Ipswich's adopted Local Plan.

IBC wish to stress that the DCO application must have proper regards to the proposed development of 3,500 dwellings at IGS, with particular reference being made to potential added noise and disturbance to existing and future occupants, the need for level crossing improvements at Westerfield Station, and the retention of the public right of way and installation of a foot/cycle bridge, rather than a permanent diversion.

Question 11. Transport: Road-Led Strategy, Freight Management Facility:

IBC has concerns over the potential for the road-led strategy to have an adverse impact upon Ipswich's Local road network and the air quality of Ipswich.

The ES accompanying the DCO must fully assess the impact of the development/project upon the air quality within Ipswich as a result of the increased traffic related emissions, which should include workers living in Ipswich commuting to the development and all forms of construction and workforce traffic (cars/LGVs/HGVs/Buses) and should also include any construction vehicles diverting through the town. This ES will need to consider and assess the impact upon the current declared AQMAs and whether the proposed development would create any further need for new AQMAs to be declared.

It is also unclear what would happen to the routing of HGVs if the Orwell Bridge were to be closed (at anytime and for any reason) and the impact this would have upon the road network (including air quality) of Ipswich. It is understood HGV drivers will have to follow an approved HGV route which would not permit a diversion from the A14 even if the Orwell Bridge were to be closed.

It has not been identified where materials will be sourced from and as such the route for the movement of vehicles carrying materials is unknown. The proposed road-led

strategy only provides a Freight Management Facility to the east of the Orwell Bridge but IBC would advise that such a facility should also be provided to the west of the Orwell Bridge should this option be progressed.

To ensure the air quality in Ipswich is not affected IBC do not wish for any approved HGV route for Sizewell C to be diverted through Ipswich.

Furthermore, consideration should also be given to ensuring approved routes for LGVs, which appear to be an unknown amount at this time and uncontrolled and could have a significant adverse impact upon traffic and air quality within Ipswich.



Ipswich Borough Council's Response to Sizewell C Fourth Round Consultation

1. Introduction

This is the consultation response to the Fourth Round Consultation for Sizewell C undertaken by EDF Energy. It is understood that the options presented in Stage three are still under consideration and will be considered alongside those proposals put forward under this Stage Four consultation. EDF Energy have set out that the purpose of this Stage Four consultation is to provide an update on some of the proposals that have changed since Stage 3 and to introduce an alternative third option for moving materials on and off-site during the construction period.

As such, IBC's Stage 3 consultation response (March 2019) response is still applicable and is included within this letter for completeness.

2. Summary of Ipswich Borough Council's response to the Third and Fourth Round of Consultation:

- 1. Of the three strategies proposed IBC would strongly encourage the use of a Rail-led transport strategy, as the most sustainable way of getting construction materials to the site. Followed by the integrated strategy and the last strategy that should be followed is the road led strategy.**
- 2. Should the integrated strategy be pursued this should include improvements to the East Suffolk line providing a legacy of rail infrastructure.**
- 3. The DCO application must have proper regards to the proposed development of 3,500 dwellings at Ipswich Garden Suburb, with particular reference being made to potential added noise and disturbance to existing and future occupants, the need for level crossing improvements at Westerfield Station, and the retention of the public right of way and installation of a foot/cycle bridge, rather than a permanent diversion.**

- 4. The Ipswich housing market needs to be part of the Accommodation Strategy that is being considered by EDF and should form part of the DCO submission, both in terms of the impact on the Ipswich rental market, and the likely need for workers who may be living in Ipswich.**
- 5. The information contained within the Consultation contains limited detail to fully justify why the marine-led strategy is no longer being pursued as an option.**
- 6. Impact upon Ipswich's air quality needs full consideration as part of the DCO process including in the EIA, and necessary mitigation such as low emission bus transfers for staff from Ipswich/Westerfield Railway Stations.**
- 7. The ES should have proper regard to the proposed development of 3,500 dwellings at Ipswich Garden Suburb, including traffic implications.**
- 8. Further information is required on the diversion strategy for HGVs and LGVs should the Orwell Bridge be closed at any time and for any reason.**
- 9. Impacts upon Ipswich's road network and air quality needs to be assessed in the ES for all vehicular movements (HGVs, LGVs, Buses, Cars).**

3. Commentary on Fourth Consultation

Ipswich Borough Council is of the opinion that movement of freight should be by the most sustainable mode of transport, i.e. the rail-led strategy should be the approach taken. However, it should be reiterated that the minor changes to the rail-led strategy from those set out within Stage Three have failed to have regard to the impact upon the Ipswich Garden Suburb set out within this Council's Stage Three consultation response.

Should the integrated strategy be progressed, this Council is disappointed that this strategy fails to provide the legacy of improved rail infrastructure on the East Coast line and would seek that any development of this strategy amends the strategy to include long term benefits to this rail line. Adverse impact should be balanced with benefits such as improved rail infrastructure

Applicable to the now three strategies proposed, this Council concerns remain as set out in the Stage 3 consultation response on the limited information, in particular concerns over the impact on the capacity of the Ipswich road network and the potential adverse impact on air quality within Ipswich and impact upon accommodation within Ipswich.

4. Commentary from Third Consultation Response

Question 1. Sizewell C Proposals: Overall

IBC having reviewed the information contained within the Third Round consultation and, as set out in the Stage 2 consultation response, continue to see the opportunities that the development of Sizewell C could potentially provide to Ipswich with the potential for supply chain opportunities, training and jobs.

However, IBC is disappointed that this consultation has still not identified or recognised what Ipswich has to offer the project with access to higher skilled staff linked to the new university as well as good residential and tourism accommodation through its public transport links. Furthermore, Ipswich has still not formed part of the accommodation strategy.

Whilst there are potential benefits from the project, there is also the potential for significant adverse impacts that need to be fully assessed as the project develops and should be contained within the DCO and assessed within the accompanying Environmental Statement.

These adverse impacts include the impact on the local private sector rental market within Ipswich, which will have to be carefully managed as the rental sector is already in high demand and prices are the highest in the area when measured against local incomes. At this time the level of workforce is unknown and should this be higher than forecast, pressure could be placed upon Ipswich's private sector rental market and affect existing and future residents should landlord's choose to offer their accommodation to the Sizewell C workforce at a higher rent.

The development of the road and rail led strategies raise wider concerns on the impact upon the local road network and air quality within Ipswich and the ES must fully assess these impacts.

Also, both strategies have failed to have full regard to the implications of the development upon IBC's Strategic Housing allocation of 3,500 dwellings on the Ipswich Garden Suburb (IGS) and IBC have more specific concerns on the proposed closure and diversion of the Westerfield Level Crossing where the IGS has a proposed pedestrian and cycle bridge to replace this at-grade crossing. Furthermore, the construction of the IGS will be alongside the construction of Sizewell C and it is unlikely that there will be a northern relief road available for use. This has not been considered as part of the PEI.

Question 3. People and Economy:

IBC continue to reiterate the comments made to the Stage 2 Consultation response. IBC is keen that local Ipswich businesses benefit from training and support to maximise supply chain opportunities. It is imperative that the marketplace website is used effectively and that local businesses are given every opportunity to bid for contracts or offered the opportunity to work as a co-operative to give the advantage of economies of scale that would not otherwise be available to them.

IBC is also keen to see appropriate links made with the University of Suffolk as part of the current and longer-term legacy plans. The Council supports the work that is ongoing with SCC and NALEP in relation to the Construction and Energy Sector Skills Plans and would expect EDF to work within these frameworks to source and train local staff wherever possible.

Question 4. Accommodation: Overall Strategy:

IBC are disappointed that Ipswich has again not formed part of the accommodation strategy. At this time the workforce has only been estimated and it is unclear what the strategy is should this forecast be underestimated.

The Ipswich housing market needs to form part of the accommodation strategy and should form part of the DCO submission. This submission must also consider the potential impacts the demand of accommodation in Ipswich would have upon its rental market as well as the likely need for workers who may already be living in Ipswich.

As set out in response to Question 1 above, Ipswich already has the highest rents against local wages in the area. If extra demand is placed upon the private sector rental market as a result of this development private landlords could choose to offer their accommodation at a higher rent to the workforce of Sizewell, thus having an adverse impact upon both existing and future residents of Ipswich.

Question 6. Transport: Movement of Materials:

The information contained within this third round consultation documentation contains limited detail to fully justify why the marine-led strategy is no longer being pursued as an option. This option needs to be fully explored before it should be discounted.

Of the two strategies that have been proposed within this Third round of consultation IBC would strongly encourage the use of a Rail-led transport strategy, as this is a more sustainable way of getting construction materials to site.

IBC do however have concerns over both of the strategies proposed and these concerns are set out under the relevant questions below.

Question 10. Transport: Level Crossings (Rail-Led):

This Third Consultation has developed the rail-led strategy. IBC strongly encourages the use of this more sustainable mode of transportation but there are concerns with the development of the strategy to date.

Of a wider concern to IBC is the impact this would have upon existing and future residents of Ipswich as a result of the running of the additional freight trains outside of normal hours that could lead to adverse impacts on residential amenities by both noise and vibration given these would be run at unsociable hours.

The strategy is limited in its details on the movement of materials and has not made reference to the Felixstowe Line. Should materials come from abroad and travel via Felixstowe it has not been assessed what impact this would have upon this line, particularly as certain parts are only single track.

Of particular importance, for Ipswich is the impact the rail led strategy has upon IBCs strategic housing site at the Ipswich Garden Suburb. A sustainable urban extension of 3,500 dwellings with supporting infrastructure. This consultation has failed to have proper regard to the development within the preliminary impact assessment.

The Rail Led Strategy proposes:-

- a) Diversion of Public Footpath in Westerfield which crosses at grade over the railway line. Three options for diverted routes of the PRow are proposed all involve the permanent closure of the at grade pedestrian crossing and diverting the existing footpath to Westerfield Road to enable the crossing of the line at Westerfield level crossing (vehicular).
- b) Upgrade of the level crossing at Westerfield Rail Station from Automated half barrier to Manual Control Barrier and CCTV.
- c) At peak construction an additional 5 trains per day are expected on the East Suffolk Line which runs through Westerfield Station.

It is stated that the improvements to the line are intended to be retained following completion.

Ipswich Garden Suburb is a policy allocation for up to 3,500 dwellings in Ipswich. The allocation site is located either side of the East Suffolk railway line which runs through Westerfield. As part of the infrastructure requirements for the housing allocation a cycle and pedestrian bridge has been proposed to replace the at grade public footpath over the railway line. Ipswich Garden Suburb is intended to be highly sustainable and includes a number of services and facilities within the allocation to limit external car journeys. Such provision includes primary schools, a secondary school, a Country Park and retail. As such, there is a heavy emphasis on promoting access by pedestrian /cycle users through the site, which includes providing safe routes over the railway line. In addition, the close proximity of Westerfield Railway station to IGS provides further opportunities for sustainable travel by residents which needs to be promoted. Easy and direct Access to the station by residents is therefore of key importance.

Currently 133 trains per day passing through Westerfield on the East Suffolk Line (as set out in Preliminary Environmental Information (PEI) submitted). Whilst the 5 additional trains related to these proposals is not significant alone but when combined with the additional freight trains expected from the Felixstowe port expansion – the total additional movements on this part of the line in the future could be substantial. The EIA's undertaken for the IGS developments have taken in to account the additional freight trains associated with Felixstowe Port only.

The implications of additional trains on this part of line to IGS are as follows:-

- Noise & Vibration - Impact of additional trains on current and future residents of IGS;
- Air Quality - Impact of additional trains and delayed traffic at level crossing on future residents of IGS
- Traffic – The impacts of more frequent and/or longer level crossing closures on traffic delays and congestion on the local highway;
- Pedestrian / Cycle access – due to the diversion of the public footpath, more frequent closures of the level crossing and subsequent decrease in accessibility to Westerfield Station for IGS residents.

The ES accompanying the DCO needs to ensure that these impacts are fully assessed.

More importantly there are a number of concerns which are raised by the proposals with regards to the Ipswich Garden Suburb development which include the following:-

- a) Diversion of the Westerfield public footpath would undermine the IGS proposals to construct a bridge. A bridge would offer safer, more direct and easy access for pedestrians and cyclists, when compared to the proposed diverted routes. The increase in train movements would further justify the need for the pedestrian and cycle bridge.
- b) Delays experienced by potential passengers trying to access Westerfield station as a result of more frequent and longer level crossing closures at Westerfield.
- c) Delays to traffic as a result of more frequent and longer level crossing closures at Westerfield and subsequent, noise, air quality implications for residents as a result.
- d) Concerns with the suitability and quality of access which could be achieved by the proposed diversion routes. All diverted route options lead to Westerfield Road where the pavement area needs to be improved/widened to ensure safe access. There are safety implications for increased pedestrians/cyclists using the level crossing and potential conflict with traffic. All diversion routes include a link through the Network Rail compound south of the railway line. Consideration as to how safe, accessible routes will be achieved via this area of operational land.

The proposed closure of the Westerfield Level Crossing appears to have had no regard to Ipswich's adopted Local Plan.

IBC wish to stress that the DCO application must have proper regards to the proposed development of 3,500 dwellings at IGS, with particular reference being made to potential added noise and disturbance to existing and future occupants, the need for level crossing improvements at Westerfield Station, and the retention of the public right of way and installation of a foot/cycle bridge, rather than a permanent diversion.

Question 11. Transport: Road-Led Strategy, Freight Management Facility:

IBC has concerns over the potential for the road-led strategy to have an adverse impact upon Ipswich's Local road network and the air quality of Ipswich.

The ES accompanying the DCO must fully assess the impact of the development/project upon the air quality within Ipswich as a result of the increased traffic related emissions, which should include workers living in Ipswich commuting to the development and all forms of construction and workforce traffic (cars/LGVs/HGVs/Buses) and should also include any construction vehicles diverting through the town. This ES will need to consider and assess the impact upon the current declared AQMAs and whether the proposed development would create any further need for new AQMAs to be declared.

It is also unclear what would happen to the routing of HGVs if the Orwell Bridge were to be closed (at anytime and for any reason) and the impact this would have upon the road network (including air quality) of Ipswich. It is understood HGV drivers will have to follow an approved HGV route which would not permit a diversion from the A14 even if the Orwell Bridge were to be closed.

It has not been identified where materials will be sourced from and as such the route for the movement of vehicles carrying materials is unknown. The proposed road-led strategy only provides a Freight Management Facility to the east of the Orwell Bridge but IBC would advise that such a facility should also be provided to the west of the Orwell Bridge should this option be progressed.

To ensure the air quality in Ipswich is not affected IBC do not wish for any approved HGV route for Sizewell C to be diverted through Ipswich.

Furthermore, consideration should also be given to ensuring approved routes for LGVs, which appear to be an unknown amount at this time and uncontrolled and could have a significant adverse impact upon traffic and air quality within Ipswich.