



Submission of Comments on EDF Change Application documents

Introduction

Felixstowe Town Council (FTC) submitted brief comments directly to the EDF non-statutory Consultation in December 2020. However, the timing of that consultation, particularly in relation to FTC's meeting timetable for approval of our comments, meant that there was only a limited time to briefly consider the implications thereof. Conversely, since the date of our submission, there have been a number of opportunities to develop the basic concepts which we mentioned.

We have also had opportunities prior to the Preliminary Meeting and the Open-Floor Hearing to further consider and briefly comment on details of the Changes, particularly as to how they relate to the original DCO, and potential mitigations to the main effects of the SZC development on FTC's areas of interest.

FTC are now preparing our full Written Representation, which will consolidate and expand on the issues raised in our RR, the Changes consultation and subsequent opportunities for research on our matters of concern.

FTC do not therefore intend to comment in further detail in this document but would refer the ExA to our consolidated WR.

However, it may be helpful to repeat here for the record our response to the EDF consultation, with some brief further notes added, as below.

FTC response to EDF Consultation December 2020, with annotations

The Town Council has considered those elements of the Change document which directly or indirectly relate to the 3 areas of concern raised in our previous submission to the DCO consultation.

We retain all of the concerns outlined in our previous submission, which have not been addressed and request that that be retained on record and consideration given to our proposals therein. The Council remains of the view that cumulative impacts relating to Sizewell C and other development will necessitate a significant upgrade of the Seven Hills junction.

However, beyond that, we greatly regret that not only do the changes now proposed not address any of the issues raised by this Council, but indeed directly further exacerbate those in particular the issue of Rail Capacity.

Note: on fuller consideration of the original and revised Transport Assessments, we have come to the view that they are flawed, in that no or insufficient data is given on the likely geographic sources for materials, or their scale and timing, whether bulk or manufactured items. In the absence of that data it is hard to judge the validity or otherwise of the quoted freight flows and hence what mitigations might reasonably be feasible or desirable.

Accordingly we are concerned that the current document presents no further or clear evidence that either the original or revised Freight Strategy demonstrate that rail capacity west or south of Ipswich can be provided without further constraints on capacity available for the large unmet demand for freight capacity from the Port of Felixstowe and its customers in the haulage and logistics industry. That demand was confirmed in very recent conversations with the Port company.

We suggest with increased emphasis that in the wider interests of the UK, regional and local importance of the Port of Felixstowe, the Strategy should not be accepted by the Planning Inspectorate in the absence of that evidence.

Conversely however we welcome the innovative proposals for potential significant increases in deliveries to and from the Sizewell site by sea, in particular the largest of the 4 options proposed for an Additional Beach Landing Facility. This appears to us to offer a much better opportunity for the reduction in HGV traffic desired by all parties.

We would further propose that consideration should also be given to the opportunity for potential enhancement of that concept to accommodate not only bulk material movements, but also container movements, which could make substantial further additional reductions in HGV traffic on the A14, and A12 and the local junctions on that route.

Note: we have now been able to consider much more carefully the concept of containerisation and the potential for marine delivery of containers, which we believe to be certainly highly desirable, and potentially feasible. A detailed paper on this is included in our WR.