

Together Against Sizewell C

TOGETHER AGAINST SIZEWELL C (TASC) WRITTEN REPRESENTATION

SIZEWELL C PLANNING APPLICATION INQUIRY (IP no. 20026424)

TRANSPORT IMPLICATION OF SIZEWELL C

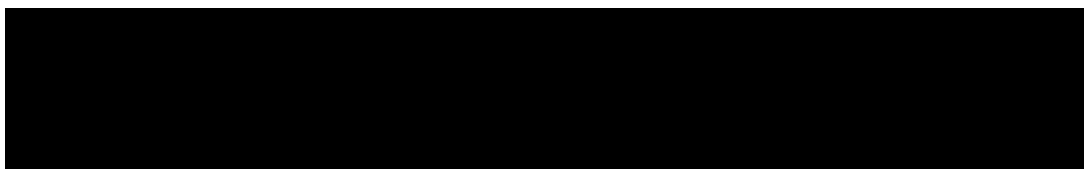
Summary: This report contains contributions from TASC committee members **Nicola Pilkington, Joan Girling, Jackum Brown, Jenny Kirtley, Pete Wilkinson (Chair), Chris Wilson and Jen Wilson** and examines the inadequacy of the proposed EDF transport strategy, the significant impacts anticipated by the need to import 12 million tonnes of aggregates and other material to the Sizewell site from the other side of the country to facilitate the 12+ year-long construction of Sizewell C and the knock-on effects the additional traffic will have on every-day life for those living, working and travelling in the East Suffolk area and beyond.

May 2021

1. Perhaps the single most worrying aspect of the planned development of Sizewell C to the greatest number of residents in East Suffolk and beyond, is the impact that will unavoidably be felt up and down the county as a result of the 12+ years of construction and its associated transport requirements. Over the past five years, a variety of options to allow ease of access to the site and means of reducing the prospect of a level of traffic build up which would become unmanageable have been mooted: none can avoid the fact that to accommodate the transport needs of a workforce of up to 8,500 with only 38% living locally, and with the projected 12.1 million tonnes of material undergoing the tortuously long journey predominantly from the West Country, 250 miles away, will create a traffic situation in East Suffolk on a scale which has not been experienced in its history.
2. The roadworks associated with the proposed construction of Sizewell C alone will cause many hold-ups on the A12 and negatively affect the connectivity of villages, affecting all local businesses residents and tourists alike. **TASC believes that the belated proposal for the greater use of rail transport is unlikely to be operationally practical (see Rail Transport WR TASC, Clive Lovelock).** Seaborne freight is likely to be used sparingly and will obviously have no impact on reducing the many thousands of car journeys by workers who will use any route they chose to reach their destination, be it the SZC site itself the accommodation blocks or the Park and Ride Sites when travelling by van, small goods vehicles or private cars. **TASC have great concerns that, with the roads undergoing upgrade and gridlock as a result of the increased traffic, most will use rat runs on B or C class roads to avoid the trunk road.**
3. The consequences of a future which predicts up to 1,500 HGV movements a day, 700 staff buses, 10,000 car/van journeys per day are that it increases pressure for a

road ‘improvement’ programme which many see as unnecessary and regressive in that it will encourage traffic growth in the long run rather than reduce it. The revised transport strategy announced by EdF (AS-280 EN010012- 002905-SZC _ Bk8: 8.18_Freight_Management_Strategy.pdf,12 January 2021) for the delivery of construction material to the remote Sizewell site is predominantly road-based – the cheapest and most convenient for the developer, although a belated and inadequate attempt to revise this to include more rail and sea-borne traffic has been made. Fears remain that the inevitability of relying on road rather than sea or a rail strategy, which is unlikely to be operationally practical (see Rail Transport WR TASC, Clive Lovelock), will require the upgrading of the main A12 arterial road with 5 additional roundabouts.

4. Many workers will drive either to a Park & Ride or go directly to the site by private car and with the smaller roads undergoing upgrades, including further roundabouts, and suffering gridlock as a result of the increased traffic, most will use rat runs to avoid the trunk road.
5. The use of rat runs will increase disturbance of residents and risk increasing the number of accidents, causing a knock-on cost impact to the NHS and other emergency services, stretching their already depleted resources further. TASC are concerned that the Applicant has not proposed any measures to prevent their workers and contractors using the rat runs.
6. The shift patterns of the workforce will mean disturbance for residents, day and night. Two campuses will be built, and two park and ride facilities for 1,350 cars at each location and the widespread clearance of land for laydown areas will further disrupt and diminish the environment.
7. Table 2.1 of the revised transport strategy document referenced above, predicts an expected total requirement of 12.1 million tonnes of material which will need to be transported to the Sizewell site, an increase of 20% on the previous prediction.
8. Crushed rock (1.7 million tonnes) is expected to be sourced from Whately, near Frome in Somerset, a distance of some 235 miles. This is scheduled to be transported by rail ‘from the quarry to the SZC batching plant...’. TASC does not believe this is possible without a reduction in passenger train services on the Ipswich/Lowestoft branch line.
9. 680,000 tonnes of ‘manufactured sand’ are expected to be sourced from Batt Combe in Somerset, 240 miles away from Sizewell. Transportation is either by road to Avonmouth for transshipment to rail or to marine vessels for ‘transport either to a marine transshipment point or directly to SZC via the BLF.’
10. 30,000 tonnes of natural sand will come from the Masters Quarry in Dorset, also some 240 miles distant from Sizewell. Transport is expected to be exclusively by road.
11. 700,000 tonnes of marine sand will be sourced from the Bristol Channel, a similar distance from the Sizewell site. Transport options are listed as the same as those for the Batt Coombe sand from Avonmouth.



12. Sources for other materials required are listed as Port Talbot, Clitheroe, St. Égrève (South of France), Scotland, Shap in the Lake District, Norway and Leicestershire.
13. Such a huge volume and weight of material required to be delivered to such a remote and inaccessible site as Sizewell from so many distant locations begs the following questions which we ask the inspector to consider in arriving at a decision on the application for the construction of Sizewell C:
14. *Is transport strategy as outlined in the referenced document remotely feasible?* TASC believes that it is not feasible insofar as the carbon debt alone associated with the transportation of aggregates to the site make the claim that SZC is essential to drive down climate change impacts null and void.
15. *For the first two years of the project, materials will be using the existing county roads and rail line which will bring significantly increased volumes of traffic onto County Roads, the rail line and rail head.* The figures show that roads will be used at peak times during the summer months, just the time of year which is the most valuable to the tourist trade. The reduction in tourist traffic due to the extended construction time for SZC and the increased congestion on its roads is likely to prove fatal to many small B and B, holiday lets and Air B and B and other tourism businesses.
16. *What is the effect of these millions of road, rail and marine miles on the projected carbon debt generated by the construction phase of the project which is currently identified as 6.2 million tonnes?* EdF have repeatedly used the false claim that nuclear electricity is 'zero carbon'. It is unclear from their documentation if this figure includes the carbon debt generated by the millions of miles of road travel involved in delivering the material to Sizewell from the opposite side of the country as well as the carbon debt from sea and rail freight. TASC note that in APP- Bk6 ES Vol 2 Chapter 26 Ref Table 26.6 that "materials transportation assumed none from further away than London/South East" and that Beach Landing Facility deliveries have been scoped out of the Carbon Footprint assessment. TASC seek assurance that neither of these statements still apply to the updated carbon footprint calculations.
17. *How will the increase of traffic pollution be measured?* Assessing air pollution impacts is notoriously difficult, especially for particulates. It is essential that the cost of constructing SZC in terms of air pollution and the consequent health impact which results from it is identified and factored into the overall cost of the development in order to better judge the cost/'benefit' assessment.
18. *Will such a complicated and multi-faceted transport strategy generate an inevitable slippage in construction time?* TASC fears that the increase in HGV traffic from Somerset and the West is likely to disrupt traffic flow using the M3 and the M25 to reach the A12. It has to be borne in mind that the Hinkley site is only seven miles away from the M5. In Suffolk, we have one 'A' road – much of which is single track - from the M25. Vehicles coming from Somerset will use this route in preference to the M11 and the A14 as it is shorter distance: M11 is 76.6 miles away from Sizewell so is only useful for traffic coming from the north.
19. *What assessment has been made in the event that the Orwell Bridge is closed due to high winds or for maintenance?* TASC believe that such occurrences would cause gridlock within and around Ipswich.

20. TASC believes that, even before the inevitable time and budget over-runs experienced by all nuclear plant construction periods, it is entirely likely that the transport uncertainties and the complications which are inevitable as a result of such a complex strategy could easily add another four or five years to the construction phase.
21. TASC further cannot see a way in which the final step of the delivery strategy, from batching plant or bulk materials consolidation and stock-piling areas, by road or by sea from the Beach Landing Facility or by rail can take place without significant further site-based work to make receipt of this material feasible or, as far as the rail option is concerned, without significant disruption to passenger services.
22. Put simply, TASC do not believe that Sizewell C can be constructed within the time currently predicted and nor can the volume of material be safely delivered to the site with the proposed transport strategy. It is our view that the years of road and rail chaos will cost the county huge losses in tourist revenues over an extended period of time.

Local impacts on community transport networks, school buses, taxi services and other community-based services:

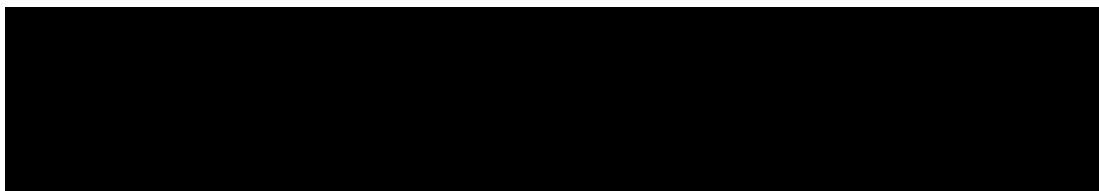
23. The EDF Transport Strategy still needs much more work before it can be considered robust. It is doubtful that Sizewell C can be constructed within the time currently predicted and nor can the volume of material be delivered to the site safely nor in a timely manner by the proposed transport strategy. The years of road and rail chaos will cost the county's tourism and business sectors dearly in lost revenue. TASC does not believe there has been adequate transport planning for the massive increase of the many thousands of vehicular movements on Class B and C roads, particularly in the many small villages and towns.
24. If permission is granted for Sizewell C, it must be contingent on the provision of a stringent management and monitoring plan in respect of all arterial roads which will be affected. Figures should then be presented to the Highways Authority.
25. Community Transport usually refers to provision like the Connecting Communities and the Volunteer Drive Service. These have increased as a result of Councils cutting their budget that supports local bus services. These organisations are at risk of being further cut due to restrictions relating to driver qualifications for minibuses stated in law.
26. The existing Bus routes take children from a wide area, including Felixstowe, to the local schools at Leiston and Saxmundham, picking up pupils from the local villages along and off the A12. Working to the same timetables, there are three other buses running across the area, carrying passengers to several train stations on the East Suffolk line and to Ipswich Hospital. EDF have assured bus companies that there will be no disruption to school buses. TASC finds this highly unlikely due to the amount of traffic anticipated.
27. Many people rely on taxi services from the train stations, often sharing the hefty cost of a journey i.e. Darsham station to Southwold, 10 miles. It will be problematic for

taxi services as drivers will be unable to judge pickup times or guarantee meeting trains, especially at Darsham and Saxmundham. We have been advised by a colleague from Bridgwater in Somerset that it is near impossible to judge timings due to unpredictable traffic and a normal journey time of 20 minutes can now take up to an hour and a half.

28. Medical: all people in the surrounding villages have to drive several miles to reach the Medical Centres. The local doctor's surgeries are either in Leiston, Saxmundham or Halesworth. All these centres involve travelling along the A12, B1122 or the B1121 and A1120. These roads will all be heavily impacted by Sizewell C traffic, again making it difficult to judge timeline for appointments. In 2019, pre-pandemic, during a BT maintenance operation, traffic lights had to be installed along the A12 at Yoxford and the resulting traffic jam stretched back to Darsham Station causing a major holdup.
29. Rat Runs and fly parking have plagued the villages around Bridgwater and Hinkley and there are fears the same will happen in this area, especially on lanes leading to the Park and Rides at Wickham Market and Darsham.

Impacts on residents.

30. The negative impacts of EDF's proposals will fall most heavily on local people, their businesses and daily lives. Over a period of up to 20 years, every journey they make will take so much longer than it should, with no guarantee of reaching their destinations on schedule. This will cause problems across the board as timetables are disrupted by the late attendance of expected arrivals. As has been referred to by many, this will have serious consequences to the blue light services, and should an emergency occur at either Sizewell B or C and residents are told to evacuate, the resulting gridlock will be near total as most of Suffolk attempts to leave the area, with only two largely single lane A roads available, the A12 and A1120 and no motorway within 75 miles. The M11 is 77.6 miles from Sizewell and the M25 is 106.1 miles away, unlike Hinkley Point C which is served by the M5, a mere 7 miles away.
31. TASC would like to remind PINS of the requirements of the Promoting Sustainable Transport chapter of the National Planning Policy Framework (NPPF), where paragraph 102 states that:
"Transport issues should be considered from the earliest stages of plan-making and development proposals, [emphasis added] so that:
 - *the potential impacts of the development on transport networks can be addressed;*
 - *opportunities from existing or proposed transport infrastructure, and changing transport technology usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - *opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."*TASC contend that the Applicant has failed to meet the requirements of paragraph 102 NPPF.



32. TASC would like to draw PINS attention to the Site Assessment for Sizewell in EN6 Volume II where at C.8.102 it states, *“Development at the Sizewell site is assessed by the Appraisal of Sustainability (AoS) as having the potential for some adverse impacts locally from additional traffic generated during construction and wider negative effects on regional road infrastructure.”* TASC believe this acknowledgement of potential adverse impacts should be considered in the light of the AoS being based on a project to build at least one reactor, over a forecast 5-6 year development involving 4,000 workers (50% local) with a main development site of 117 hectares. The current proposal of building 2 reactors over 10-12 years (12-14 years including the relocation of Sizewell B facilities) utilising a peak workforce of 8,500 workers (38% local) on a main development site of 371.7 hectares, will have far greater adverse impacts than originally assessed which, if known at the time of the initial assessment, could have led to Sizewell being rejected as a potentially suitable site.

Impacts on the Heritage Coast and Suffolk Coast and Heaths AONB

33. The Applicant has had 5 consultations over 9 years to arrive at a firm sustainable and acceptable transport strategy for its proposed SZC project and the fact that it has not been able to do this supports TASC’s contention that there is no acceptable transport strategy that can provide a sustainable route to the SZC project. Suffolk County Council, the lead authority on highways, rejected the Applicant’s transport strategy that was presented in the Applicant’s DCO application in May 2020. In response, the Applicant has presented various concepts that involve increased deliveries by road and by sea. As mentioned above, the revised rail proposals do not appear to be at all feasible without having an adverse impact on rail passenger services. The increase in sea-borne deliveries involves a new jetty and an enhanced permanent beach landing facility, both of which will have adverse impacts on the attributes that gave rise to the AONB’s designation as well as the Heritage Coast in the short term and long term and are anticipated as having greater adverse impacts on coastal processes. These adverse impacts have not been assessed by the Applicant against the benefit of having more sea freight deliveries.

