

Yoxford Parish Council

EDF Energy Sizewell C – Stage 5 Public Consultation Response

Freight Transport

The people of East Suffolk do not want lots of HGVs on the local roads because the resulting congestion and increased journey times will damage other businesses (especially tourism), will impact on the quality of life for local people and will have a negative impact on the environment and air quality. It is therefore pleasing that there are proposals for increasing the use of rail and sea for freight deliveries and reducing the number of HGVs by road. However, it is disappointing that this message has only properly been taken on board after DCO submission and not during the eight years and four consultation stages that preceded it. It is disappointing that the rail and sea proposals are only for potential changes that appear to be far from certain and, even if these are fully delivered, there will still be a large number of lorries on the roads that will cause the damage previously mentioned.

We find it difficult to understand why the proposals cannot be much firmer at this stage. At consultation stages 1 and 2 there were proposals for both rail and sea led strategies. Stage 3 included a rail led strategy and stage 4 had a hybrid road and rail strategy for freight transport. Many 100s of pages of proposals have been written about different freight strategies, but it appears that work did not extend to working out how many freight trains can run along the East Suffolk line each night for different scenarios of improvement works, or what sort of beach landing facility could be used to deliver aggregates to site and that work still has to be done now. It is hard not to conclude that sea and rail led strategies were never serious options that have not been investigated fully. It appears that they are only being investigated now because key stakeholders continue to oppose the heavily road dependent freight strategy submitted to the DCO.

Rail Proposals

Looking at the rail proposals we note that there is only the "potential" to increase to four trains per day or "even five" for a "limited peak period", "5 or 6 days a week". We would like to know how much potential, is it four or five trains or actually neither and we are back to two and then three when the green rail route is complete, is it 5 or 6 days per week, how long is a limited peak period, is this period limited by some aspect of rail capacity or limited by the project's peak demand for the materials to be delivered by rail. Most importantly, when it is clearer what you can actually rather than potentially do, what is the actual forecast impact on the number of HGVs on the roads and when will the work be complete? We need something more certain to comment on. We are also concerned about the noise at night for people living near to the railway. We cannot tell whether the proposed noise mitigations will prevent significant disruption to the lives of those affected.

Beach Landing Facility

The beach landing facility proposals are similarly uncertain making it difficult to comment other than to say that we support the maximisation of freight delivery by sea as it has the least impact on local businesses and communities. A minor point as the intention appears positive, but could you clarify how often you expect the coast path to be closed. The wording "could be kept open...as far as it is reasonably practicable and safe to do so" used in the proposals (2.2.18) could mean hardly ever open, hardly ever closed or everything in between.

Overall View on Freight Transport

Our overall view on the freight proposals is that delivery by sea should be prioritised over rail and then rail over road because we believe the impacts on local businesses and communities would be minimised by that approach. Even if the options that maximise sea and rail delivery are chosen and fully delivered, the proposals do not reduce delivery by road enough. There will still be far too many HGVs on the unsuitable roads causing congestion, damaging local businesses and local communities. The proposals say "Even with unlimited rail and sea capacity, however, the volume of material moved by HGV is unlikely to be less than 40% of the total as this proportion of materials is best suited to road transportation". That volume of HGV traffic will cause harm that needs to be mitigated. The harm can be mitigated by further road enhancements which EDF have thus far been unwilling to make, and / or it can be mitigated by increasing the proportion of materials delivered by rail and sea. Materials that are "best suited" to road transportation do not have to be delivered by road. Some of those materials can be delivered by sea or rail. It may cost EDF more to do that in order to reduce the cost and impact on local businesses and communities but that is often the way with mitigation and is not the basis to rule it out.

Main Platform

The proposals include the reduction in height of one of the pylons but the retention of the others and no proposals for replacing the pylons with over or under ground interconnection. We ask again that an alternative design of interconnection is considered that cause less visual harm. We understand that Suffolk County Council have commissioned research that identifies alternatives.

Yoxford Roundabout

The proposals for the Yoxford roundabout look reasonable. However, we would like some reassurance that the roundabout will be safe for cyclists and pedestrians. The existing junction is on a sharp bend which tends to calm the traffic to speeds well below 30 mph. The new roundabout will allow traffic to approach much faster. We are particularly concerned about traffic approaching from the north downhill at speeds above the current 40 mph speed limit. It appears traffic will have good line of sight to opposite traffic turning right and could therefore enter the roundabout at significant speed if they saw the junction was clear. This would represent a risk to cyclists turning right into the B1122 and potentially to pedestrians. This risk should be mitigated.

Overall View

Yoxford Parish Council do not want to continually oppose Sizewell C. We would like EDF to make their proposals, be clear on the harms they cause and identify reasonable mitigations that address those harms. We are fed up with proposals that represent the absolute minimum EDF think they can get away with that leave a lot of harm for local businesses and communities to pick up. The only reason we have the current proposals is because it became obvious that the DCO submission was less than EDF could get away with. Even assuming the best case split between sea / rail and road we believe these new proposals do not go far enough and the number of HGVs will still create unacceptable harm for local communities and businesses. Although Sizewell is a designated site for new nuclear builds the local transport infrastructure and the constrained and sensitive nature of the site do not lend themselves to a development of the size being proposed by EDF. Much more needs to be done to mitigate the impacts of what is being proposed.

As we get nearer to a decision on whether to proceed with Sizewell C we would like to raise again our concern about how the development is managed once underway. We are very concerned that issues that arise during construction will increase the impacts on local businesses and communities. It is easy to envisage scenarios where early road improvements are delayed, it becomes difficult to run the forecast number of trains, the beach landing capacity is lower than hoped for and so on. These scenarios are likely to lead to a situation where the project will be delayed and / or cost more unless dispensation is given to increase the number of HGVs on the roads with the consequential increase in impact on local businesses and communities. We would like to see some firm commitments to HGV volumes above which dispensation will not be sought. In particular, what would the maximum permissible HGV volumes be on the B1122 in the early years and in the rest of the project, what is the maximum duration of "early years" and what would be the maximum permissible HGV volumes be on the A12 and link road throughout the whole project. If dispensation is sought to increase HGV volumes for how many days per year would this be sought and would there be a commitment not to seek any such dispensations during peak holiday season. It is important that these commitments are made in advance of work beginning as we fear that once the project is underway the pressure to keep to the plan will always lead to dispensations that adversely impact the local community.

Councillor Paul Ashton on behalf of Yoxford Parish Council