

1. Summary of Main Points

- 1.1. National policy has designated Sizewell as a potential site for new nuclear build. However, that designation does not mean any design would be suitable. We believe that the design proposed by EDF is too large and most of the problems with the proposals stem from that design.
 - 1.1.1. It causes too much damage to the coast and heaths AONB.
 - 1.1.2. It requires a road and rail infrastructure that isn't available and a marine strategy for materials that is apparently impossible.
 - 1.1.3. It will cause traffic congestion, noise, vibration and so on to the detriment of the local population.
 - 1.1.4. It causes the need for further pylons and overhead cabling on site further damaging the AONB.
 - 1.1.5. The workforce it requires is too large and cannot be accommodated in the local housing available.
 - 1.1.6. The traffic congestion, damage to the AONB and Minsmere and loss of amenity damages the tourism industry which creates many local jobs.
 - 1.1.7. It will provide something of a boost to the local economy but because the local economy does not have much slack it will actually cause a localised boom followed by a crash.
- 1.2. The obvious solution to all the previous points is to design a power station that is smaller and therefore more suited to the location, transport infrastructure, accommodation and local economy. We believe EDF is trying to get their only design to work at a site that isn't suitable for it.
- 1.3. We welcome the proposal of a relief road for the road led strategy but believe it is needed for either road or rail strategies and is being proposed in the wrong place.
- 1.4. We believe EDF should revisit their reasons for abandoning the marine led strategy and failing that must implement the rail led strategy. A totally road led strategy for a development of this size is unacceptable.
- 1.5. We believe the accommodation campus should not be sited next to an AONB and, instead, should be split and located nearer existing urban centres.
- 1.6. We are concerned at the lack of transparency around the gravity model and are sceptical about the accuracy of the traffic forecasts. We have particular concerns about the forecasts for the A1120 and for the modelling of the A1120 / A12 and B1120 / A12 junctions.
- 1.7. We support the proposed roundabout for the B1120 and A12 junctions subject to detailed modelling and more detail on the design.
- 1.8. There needs to be mitigation or compensation for Yoxford residents who live along the B1122.
- 1.9. We believe that there is still so much detail missing from EDF's proposals that a further consultation stage is needed before submission to the planning inspector.

2. Introduction

- 2.1. Yoxford is a village of roughly 700 people and 400 houses. It has twice the national average number of people over 65 years old and half the national average number of children under 18 years old. Many people move here for the peace and quiet and for its proximity to the Coast and Heaths AONB, Minsmere and other local attractions. The amenities in the village are quite good for its size but are inevitably limited: two pubs, one corner shop, a primary school, a restaurant, antique shops, a café, a garage, a church and a village hall with an outreach post office.
- 2.2. There are several B&Bs in the village that provide serviced tourist accommodation. A significant proportion of their trade is for visitors to the Minsmere nature reserve. Satis House Hotel and restaurant is also within the village and next to the proposed site for the B1122/A12 roundabout. The village also has a number of holiday cottages of various sizes all of which rely on visitors to the Minsmere nature reserve and Coast and Heaths AONB for some of their trade. The café, restaurant, shop, antiques shops and pubs provide facilities for local residents, tourists and passing trade.

3. Attitude to Nuclear Power and Sizewell as a Potential Site

- 3.1. Within the village there is some opposition to any new nuclear power in the UK and there is greater opposition to any new nuclear power station at Sizewell. In producing a response that attempts to represent the whole village Yoxford Parish Council must acknowledge those views even if they are more matters of national policy rather than the EDF proposal.
- 3.2. The opposition to nuclear power is based on
 - 3.2.1. Concern about the environmental impacts of the construction of new nuclear power stations (local site, pollution from transport, concrete and other materials etc.).
 - 3.2.2. Concern about the potentially devastating environmental impacts of storage of nuclear waste materials if something goes wrong.
 - 3.2.3. Concern about the ongoing and very long-term cost of the storage of nuclear waste materials being passed onto future generations.
 - 3.2.4. Concern about the potentially devastating human impact from an accident or natural disaster.
 - 3.2.5. Concern about the cost of nuclear power generation.
 - 3.2.6. A belief that the combination of renewables, storage and carbon capture are moving to a position where new nuclear may not be necessary. We know that these things do not yet rule out a role for nuclear power as a possible lower polluting base load than coal and to a lesser extent gas. However, ten years ago it was inconceivable that wind power would be as cheap and producing as much energy as it is today so people are rightly sceptical about predictions that say renewables, storage and carbon capture cannot negate the need for new nuclear within the timeframe of Sizewell C construction.
- 3.3. The opposition to Sizewell as a site for new nuclear is based on:
 - 3.3.1. Concern about the impact on the AONB, SSSI, Minsmere and the landscape/seascape in that area.
 - 3.3.2. Concern about the impact on tourism and tourism related jobs
 - 3.3.3. Concern that the area does not have the road and rail infrastructure to support the construction.
 - 3.3.4. A belief that Sizewell would not be considered a suitable site if Sizewell A & B had not already been built combined with a belief that Sizewell A & B would not have been approved if modern day tests for environmental and amenity impact had been

applied at the time they gained consent. In other words, because Sizewell A & B have ruined the landscape is not a justification for making it even worse with Sizewell C.

- 3.4. The Parish Council know that these two views are not the unanimous opinion of the village and that no one attends village meetings to vehemently express their apathy but the views are widespread within the village and ought to be aired.

4. Main Development Site

- 4.1. At stage 2 the Parish Council raised concerns about the size of the development and its impact on the landscape and significant negative impact on the AONB. None of these concerns have been addressed.
- 4.2. Instead stage 3 introduces pylons and overhead cabling at the reactor site that have made the impact even worse. The pylons and cabling cause more damage to the landscape and the AONB, increase the visual impact and extend the range at which the visual impact is felt. The cabling was going to be underground in previous stages but we understand from presentations from EDF that the space available at the site means the cabling can no longer be underground. So, yet another reason why the site is not suitable for the proposed development.
- 4.3. The Parish Council continues to be concerned about the negative impact of borrow pits, spoil heaps and cranes during the development. This will have a negative impact on tourism for an extended period of time and will do long lasting damage to that industry.
- 4.4. Our view remains the same. We believe that the twin reactor design being proposed by EDF is too big and not appropriate for such a sensitive site. A different, much smaller, power station needs to be considered.

5. Transport

- 5.1. The Parish Council welcome that in stage 3 EDF recognise the lack of suitability of the B1122 and the need for a relief road from the A12 to the site.
- 5.2. While a rail-led strategy would reduce the number of HGVs on the roads their number would remain significant and we believe a relief road remains needed in either the rail or road-led strategy. The traffic impact has never just been about HGVs. It is the combination of HGVs, LGVs, buses and supply chain and worker journeys by car. The rail-led strategy only addresses part of the HGV impact.
- 5.3. The Parish Council have always been aware that there are environmental drawbacks to new road building and our support for a relief road was a trade-off between those impacts and the impact on local people of trying to use existing roads. It is therefore important that the new road has the maximum long-term benefit. We believe that EDFs preferred option (option Z) does not provide any long-term benefit. We note that the County Council are unsure whether they would adopt such a road at the end of the construction. We are also disappointed in the way EDF dismissed the longstanding D2 option with little justification in our view. We ask that EDF reconsider the choice of route for the relief road and seriously consider D2 or option W both of which would provide an on-going useable route to Sizewell and Leiston and would be a shorter route to site for construction traffic. We agree that options X and Y are not suitable.
- 5.4. In either the road or rail led strategy EDF propose to continue using the B1122 for HGVs arriving from the north and park and ride buses. This route would also be used by some worker journeys to and from campus and some LGV and supply chain journeys. This still creates a significant impact on Yoxford residents who live along the B1122 that has no mitigation. We note that EDF propose building a by-pass around Theberton to mitigate the

impact of traffic there. As no equivalent solution is offered for Yoxford we believe the residents affected ought to be offered compensation if the development proceeds. As it does not directly affect us, Yoxford Parish Council do not have a view on the suitability of the proposed Theberton by-pass and believe Theberton and Eastbridge Parish Council are better placed to provide an assessment.

- 5.5. Although we do not like the impact traffic from the north will have on residents living along the B1122 the Parish Council do not want to see changes to strategy that result in the traffic from the north passing through Yoxford on the A12 past the Kings Head public house and onto the new link road. In our view this would be an even worse solution, causing greater disruption, possible air quality issues and further load to the A12/A1120 junction.
- 5.6. The Parish Council are disappointed that the marine-led strategy has been abandoned. We do not have the expertise to assess whether this strategy is really not possible but we note that others that do have the skills believe the marine-led strategy has been abandoned too readily and ought to be reconsidered. We believe that if a marine-led strategy really isn't possible this seriously questions whether the Sizewell site is suitable for the proposed development and perhaps a site that can support a marine strategy ought to be selected instead.
- 5.7. Having abandoned the marine-led strategy EDF have provided a choice between a road and rail led strategy. Notwithstanding our previous comment about the suitability of the site without a marine-led strategy, in our view the absolute minimum that is acceptable is full implementation of the rail led strategy and the link road and other road improvements from the road led strategy. The choice ought to be between properly mitigating the transport impacts and not progressing with the development at all.
- 5.8. At stage 2 we asked that the key features of the gravity model are shared with us. We are disappointed that this hasn't happened. We are even more disappointed that the County and District Councils believe they have not seen sufficient detail of the gravity model. The assumptions in the gravity model drive the traffic modelling. We do not understand this lack of transparency. At the moment we have no confidence in the traffic modelling results and therefore whether the areas requiring mitigation have all been identified or the required level of mitigation understood
- 5.9. We require transparency about the following:
 - 5.9.1. The assumptions about where workers will be travelling from and when and in what numbers.
 - 5.9.2. The assumptions about HGV and non-HGV journeys made by the supply chain in supporting the construction.
 - 5.9.3. A comparison between the assumptions used in traffic modelling for Hinkley Point C and the actual results now construction is underway.
 - 5.9.4. Evidence that shows how the difference between the forecasts and actuals at Hinkley Point C has been taken into account in Sizewell C traffic modelling. This needs to include the estimates provided during Hinkley Point C consultation about how far workers will travel to site and the reality at Hinkley Point C now.
 - 5.9.5. Actual vehicle occupancy rates at HPC and a justification why the same rates ought not be used in Sizewell C traffic modelling.
 - 5.9.6. The assumptions about baseline traffic volumes at the point construction starts with a worst-case scenario in case the start of the work is delayed.
 - 5.9.7. Modelling to take account of the busiest hours of the day at the busiest time of year. We do not believe that the combination of construction traffic, peak tourist traffic

and abnormal agricultural traffic during harvest has been properly understood. Whilst this may only be for the six weeks of school holidays it is the time when most damage to future tourism could happen.

- 5.9.8. The rationale for the 15% - 85% north / south split for the origins of HGVs
- 5.9.9. How non-Sizewell C traffic will react to the increased traffic volumes caused by Sizewell C traffic. EDF acknowledge that increased congestion caused by Sizewell C traffic will cause displacement. The displaced traffic may not be related to Sizewell C but its displacement is a direct consequence of Sizewell C so it needs to be modelled and potentially mitigated against.
- 5.10. We are unconvinced by the current traffic modelling and are concerned about the level of traffic along the A1120. For traffic coming from Stowmarket and further west the A1120 provides an alternative route from the A14/A12 to Sizewell, the Darsham park and ride and the A12 north of Yoxford. It is ripe for displacement as a result of increased congestion on the A14/A12. It is also important for tourism with attractions along the route and many of the villages designated as conservation areas. The road becomes significantly busier during the peak tourist season and during harvest. Abnormal harvest vehicles do block the road completely requiring parked cars to be moved to get past. Although designated as an A road, this road is not really appropriate for HGVs. Most villages have places where two lorries could not pass and there are many places outside villages where lorries would have to slow down significantly to pass. Our concerns for this road are:
 - 5.10.1. Without sight of the gravity model and assumptions we cannot be sure and are sceptical about the traffic modelling forecasts. We believe they will be higher. We also believe that modelling of this road must take account of the busiest time of day at the busiest time of year.
 - 5.10.2. We do not think traffic displacement has been modelled properly.
 - 5.10.3. Whilst EDF may have processes in place to avoid their HGVs using this road, other HGVs may be displaced onto this road as a result of congestion on the A14/A12 with detrimental impacts on all villages along the route. Reclassifying the road as a B road may provide some mitigation.
 - 5.10.4. An increase in traffic on this road will significantly increase the risk of accidents. There are limited places for overtaking and many of the potential places are dangerous.
 - 5.10.5. Additional traffic on this route will have a detrimental impact on tourism.
- 5.11. A1120 / A12 junction. Our continuing concerns about the A1120 traffic forecasts mean we also remain concerned about the capacity of the A1120 / A12 junction. We are concerned that tailbacks could build up here at the busiest time of day and time of year.
- 5.12. We are concerned that the road just to the west of Yoxford that passes Yoxford Antiques Centre combined with Willow Marsh Lane may provide a bypass around Yoxford for people getting to the park and ride and also for people heading north on the A12. These are single track roads with limited passing places and are not an appropriate alternative route.
- 5.13. Some Yoxford residents live along the B1122. In either the road or rail led strategies the impact on their quality of life has not been mitigated. The bypass around Theberton, whilst welcome, does nothing for them. We ask that EDF consider suitable ways to mitigate that impact.
- 5.14. Roundabout at B1122 and A12 junction. With either the road or rail led strategy we agree that there is a need to increase the capacity of the B1122 and A12 junction and agree that

the roundabout represents the best solution subject to more detail on the design. However, at stage 2 we raised a concern about the relationship between the A1120 / A12 junction and this new roundabout. We are disappointed that at stage 3 there are no results of more detailed modelling and as stated elsewhere we remain concerned about the traffic modelling on the A1120 in general.

- 5.15. We ask that EDF commit to all the park and ride buses being electrically powered rather than diesel.
- 5.16. A12 / A144 junction. We welcome EDF's intention to improve the capacity of this junction for traffic turning right out of the A144 by creating a central reservation area. However, we are not convinced that this would create sufficient capacity at the junction and would like to see further evidence that tailbacks would not occur on the A144 at busy times.
- 5.17. We are concerned that the road improvements EDF are proposing will not be completed soon enough and that there will be significant disruption during the early stages of the construction when the existing roads and junctions will still be used. We ask that the schedule for this work is revisited and the road improvements / builds are accelerated or initial construction is delayed to reduce those impacts.

6. Accommodation Strategy

- 6.1. Despite previous objections from many sources, the proposed campus is next to an AONB on a site that is tightly constrained and unlikely to be able to expand to handle more workers if the workforce increases beyond the 5400 currently planned towards the 7900 modelled for traffic.
- 6.2. There are other options for the site(s) of the accommodation campus and we ask that EDF does as it has said it will and assess other options and avoid placing greater pressure on the AONB.
- 6.3. We still hold the view that the accommodation campus would be better split and located nearer to urban centres as this would reduce the need for worker car journeys and potentially increase the viability of amenities that could be shared by the current population. It would provide a better chance of the campuses providing some legacy. It would also help with the integration of non-home-based workers into the local population in way that cannot happen with the proposed campus.
- 6.4. We are concerned about the impact on the private rented sector and are unconvinced that there is the capacity to accommodate the workers who will not be in the campus or caravan park. This is especially true if the workforce exceeds 5400. We ask that EDF provide evidence to back up its believe that there is sufficient accommodation in the private rented sector.
- 6.5. We are also concerned that the demand for accommodation may encourage the repurposing of existing tourist accommodation for Sizewell C workers. This will have a negative impact on tourism and the jobs associated with it.
- 6.6. We believe that EDF have not yet proven their assumptions about the capacity the local area has to accommodate the Sizewell workers.

7. Socio-Economic Strategy

- 7.1. We are concerned about the lack of detail about the socio-economic strategy in what is the last consultation phase of the development proposals
- 7.2. The development will provide jobs for local people who would otherwise be unemployed but as the local area has one of the lowest unemployment rates in the country this benefit

will not be as great as it might be at other locations. This area has had low unemployment levels relative to the rest of the country for some time and there is little reason to believe this will change significantly between now and the start of development.

- 7.3. It is likely that the main benefit could be in an uplift in local skills but this will only happen if it is managed. There is a risk that high skill roles go to non-home-based workers. We do not believe the stage 3 proposals adequately explain the strategy for uplifting local skills.
- 7.4. The Parish Council is concerned that the displacement of home-based workers onto EDF or supplier jobs will create worker shortages in some sectors. As the local economy is currently so tight, we feel it is likely that Sizewell C development will create a local boom followed by a bust as the development ramps down.
- 7.5. The Parish Council is concerned about the negative impacts on tourism. We do not believe that the stage 3 proposals properly identify the impacts or mitigations and ask that these be established as soon as possible. We note with disappointment that we made the same point at stage 2.
- 7.6. It is normal for a large development to compensate for its negative impacts by the economic benefits it brings. The combination of the risk of a boom and bust and the negative impact on tourism makes us believe the economic benefits do not nearly justify the negative impacts.
- 7.7. Social cohesion. We believe the location of the workers' campus will have a significant impact on social cohesion and integration of the non-home-based workers. We believe it should be split and located near to existing urban centres.
- 7.8. Schools, health, education, police and other services. We cannot speak with authority on these matters but note that the District and County Councils are not satisfied with the level of impact assessments, identification of issues and mitigations in this area. The Parish Council believe those concerns seem reasonable and are disappointed that this problem was also identified at stage 2.

8. Consultation Process

- 8.1. We continue to be concerned by the depth and quality of the analysis behind EDF's proposals and the evidence to support the extent of the potential impacts.
- 8.2. At each stage of the consultation we feel EDF are providing the minimum analysis they feel they can get away with and the mitigations for identified problems are either totally unacceptable or, at very best, also the least they can get away with. We understand EDF have commercial considerations and most mitigation has a financial impact, but the approach so far has totally undermined EDFs credibility with local people.
- 8.3. This approach is not uncommon with big developments. The developer gives lots of assurances and promises but, in reality, does the minimum needed to gain approval and get work started. Once work is underway, problems impacting the local community that could have been foreseen start to emerge. Mitigation is resisted with the defence that it will impact the project timescales with the result that mitigations don't happen and the local population suffer.
- 8.4. If Sizewell C goes ahead we do not want to be on the receiving end of this approach. We do not know what the mechanism is, but we want something in place that incentivises EDF to ensure the analysis and planning being done now is of a good quality and the foreseeable problems are identified and dealt with because problems found later will still have to be resolved even if that means delays and increased costs.

- 8.5. We would like to think EDF would want to offer up an approach that gives the reassurance we seek because they want to have a trustworthy and constructive relationship with the local population and don't want their development to have any more negative impact than absolutely necessary. It is depressing that, at the moment, that feels like a pipe dream.
- 8.6. We would be very happy to discuss this further with EDF and look for ways to improve the current situation.
- 8.7. As a result of our views on the consultation so far, we do not believe that these proposals are anywhere near ready for submission to the planning inspector. We ask that EDF enhance the proposals significantly and carry out a further consultation phase.

Councillor Paul Ashton on behalf of Yoxford Parish Council