

EDF Stage 4 Pre-application Consultation

Yoxford Parish Council Response

19th September 2019

1. Missing Information

- 1.1. In previous responses Yoxford Parish Council and others have asked for more details to be provided on a variety of topics so we can see that issues have been identified and appropriate mitigations have been put in place. Where, in our opinion, issues have not been identified or appropriate mitigations have not been defined, the consultation stages provide us with an opportunity to provide feedback to EDF. Not providing sufficient information on some subjects prevents us from being able to feedback and undermines the consultation process.
- 1.2. We would like to see more information on the following areas:
 - 1.2.1. The impact of the construction on the local tourism industry.
 - 1.2.2. Detail on the socio-economic strategy.
 - 1.2.3. Environmental impact assessments
 - 1.2.4. The characteristics of the gravity model and how these assumptions are used to derive the traffic volumes forecasts used elsewhere in the consultation documents. At stage 3 we listed information that we feel ought to be provided in a meaningful consultation. We are disappointed that at stage 4 there has been no attempt to provide any of the information we asked for. We list it here again in the hope that you might respond this time:
 - 1.2.4.1. The assumptions about where workers will be travelling from and when and in what numbers.
 - 1.2.4.2. The assumptions about HGV and non-HGV journeys made by the supply chain in supporting the construction.
 - 1.2.4.3. A comparison between the assumptions used in traffic modelling for Hinkley Point C and the actual results now construction is underway.
 - 1.2.4.4. 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.
 - 1.2.4.5. Actual vehicle occupancy rates at HPC and a justification why the same rates ought not be used in Sizewell C traffic modelling.
 - 1.2.4.6. 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.
 - 1.2.4.7. 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.
 - 1.2.4.8. The rationale for the 15% - 85% north / south split for the origins of HGVs
 - 1.2.4.9. 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.

- 1.3. Due to the lack of information in several important areas we do not believe that there has been suitable consultation on the plans for construction of Sizewell C. So, yet again, we feel we have no choice but to ask for another consultation stage that includes this missing information before a development consent order is submitted.

2. Overall Comments

- 2.1. National policy has designated Sizewell as a potential site for new nuclear build. However, that designation does not mean any design and construction approach would be suitable. We believe that the design proposed by EDF is too large for the site and for a single construction phase.
 - 2.1.1. It causes too much damage to the coast and heaths AONB.
 - 2.1.2. It requires significant enhancement to the road and rail infrastructure and, so far, EDF appear unwilling to make the enhancements required.
 - 2.1.3. It should have a marine led approach to transportation of materials to and from site but EDF do not believe a marine strategy is possible. We believe this option has been dismissed far too readily.
 - 2.1.4. It will cause traffic congestion, noise, vibration and so on to the detriment of the local population.
 - 2.1.5. It causes the need for further pylons and overhead cabling on site further damaging the AONB.
 - 2.1.6. The workforce it requires is too large and cannot be accommodated in the local housing available.
 - 2.1.7. The traffic congestion, damage to the AONB and Minsmere and lose of amenity damages the tourism industry which creates many local jobs.
- 2.2. 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 favoured design to work at a site that isn't suitable for it.

3. Specifics in Stage 4

- 3.1. In its stage 4 consultation, EDF has asked for opinions on two options "for how to make the pylons blend into the countryside". It is extremely difficult not to be flippant when faced with such a request. In either option the pylons will be an unacceptable eyesore in an AONB. The option that should be offered is the original intention to put the cables in underground tunnels.
- 3.2. The transport issues that will impact Yoxford come from the combination of movements of HGVs, buses, LGVs, workers travelling to and from campus, workers travelling to and from the park and ride sites, non-work-related journeys made by workers and, in some cases, their families and non-Sizewell C journeys displaced onto other roads by the congestion caused by Sizewell C traffic. It is not just about HGV movements. So, we believe that a Sizewell Link Road is required regardless of whether the transport strategy is rail led, road led, the new hybrid rail/road strategy or even a marine led strategy.
- 3.3. It is not acceptable to have a significant proportion of the HGV traffic on the roads. In our view to still be trying to do so is an admission that the size of the development is not compatible with the existing transport infrastructure plus the enhancements EDF is able or willing to make.

- 3.4. EDF should be focussed on making either the rail or marine strategy work. However, for Yoxford, a rail or marine led strategy that does not have a link road would be worse than either the current road led or hybrid strategy as it would mean all other traffic using the A12 / B1122 with no mitigation other than a roundabout at the A12 / B1122 junction.
- 3.5. We have looked further at the proposed roundabout at the A12 / B1122 junction. We welcome the proposal to enhance the junction and support a roundabout as the way to achieve the increased capacity. However, we believe that the roundabout could be smaller and still create sufficient capacity at that junction. The current proposal takes more land than is absolutely necessary and we ask that a smaller option is considered.
- 3.6. At stage 4 EDF have asked what should happen to the link road when the construction has finished with the potential for it to be taken up and the land restored. At stage 3 we, and many others, commented that whilst the proposed link road was a welcome development, it was in the wrong place. We strongly support the link road but recognise that road building has a negative environmental impact, so it would be much better if the link road has some legacy benefit. The D2 route or option W from the stage 3 consultation provides both the relief and the legacy benefit so we ask that EDF adopt this solution for the link road and do away with any need to rip up a relatively newly built road.
- 3.7. Regardless of location, the relief road does not mitigate the negative impact on the B1122 of park and ride traffic, HGVs coming from the north, some LGV traffic and workers travelling to and from the campus. There needs to be more mitigation for Yoxford residents who live along the B1122.

Councillor Paul Ashton on behalf of Yoxford Parish Council