

EDF Stage 2 Pre-application Consultation

Yoxford Parish Council Response

2nd February 2017

Introduction

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. 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.

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, visitors and passing trade. Some of that trade is for tourists. One of the pubs and the café have closed and reopened with new owners twice in the last three years. They can both be successful businesses but are clearly challenging to run. Neither can tolerate adverse impacts to tourism by the SZC construction. Some people in the village work in tourism related roles in the Coast and Heaths AONB and others at Southwold, Aldeburgh, Snape and other tourist destinations.

Yoxford Parish Council conducted a residents' survey last year to identify issues that need to be addressed within the village. The speed and volume of traffic on the A1120, B1122 and A12 was clearly the issue that caused most concern amongst people in the village, a problem that will be significantly aggravated by the SZC proposals.

1. Overall

1.1 Yoxford Parish Council recognise the challenge involved in planning for a construction the size of Sizewell C in an area like the Suffolk coast. The proposed site is in an area of outstanding natural beauty, next door to the world famous Minsmere nature reserve and the Coast and Heaths AONB. It also has many sites of special scientific interest. The Suffolk coast is very susceptible to erosion and flooding so there is a high risk the development will cause further coastal erosion in ways that are hard to predict. There are no large population centres near the site to provide facilities for the several thousand strong workforce. There is insufficient housing capacity locally to accommodate the incoming workforce and the demographics of the local population are totally different to the SZC workers creating social cohesion challenges. The transport infrastructure in road, rail and sea is not suitable for the numbers of movements of people and materials required. It will be difficult to mitigate against the impact of the SZC construction on the local tourism industry that provides jobs to so many local people. We recognise the benefit the construction will bring in jobs directly and through the supply chain but it will be difficult to avoid repeating the boom and bust that happened with Sizewell B. It will also be difficult to avoid disrupting the supply of tradespeople to the rest of the local market resulting in scarcity and price inflation for everyone else.

1.2 The Stage 2 consultation has been a long time coming and Yoxford Parish Council welcomed its arrival so we could see the proposals for how these challenges would be addressed. Having read the

consultation document, we are extremely disappointed that the proposals go nowhere near addressing the challenges. Our main concerns are:

1. The proposed construction and the required construction site are too big for the proposed site as it is in an AONB that generates significant tourism and therefore jobs. EDF do not have to build a twin reactor power station at Sizewell. We ask that they consider alternatives.
2. The B1122 is not suitable for the amount and size of construction traffic required for the proposed construction (approximately the size for Sizewell A & B combined). We ask that EDF consider other options like the D2 relief road that was proposed for Sizewell B.
3. Eastbridge is not a suitable site for the accommodation campus as it has no amenities, it extends the construction site even further creating more damage to an AONB and it adds further traffic to the B1122. We ask that the campus is spread over several sites that are located near to population centres with amenities and away from the B1122 if that is to be the main route to site for construction vehicles.
4. We do not believe the impacts on wildlife, coastal erosion processes and water flows have been fully understood.
5. We believe that the proposed borrow pits and 35m high stockpile will cause an eyesore in an AONB with a detrimental effect on use of the area for tourism and by local people.
6. We feel that an opportunity is being missed to build affordable accommodation to be used initially by Sizewell C construction workers and eventually by local people if the accommodation is built in places where it will be needed long term. We ask that EDF facilitate this opportunity by working with house builders and the local councils.
7. The traffic forecasts are not convincing as the gravity model has not been shared (it informs the traffic model) and the traffic model has also not been shared. Instead we have a mix of average and peak hour traffic forecasts that do not coincide with the peak tourist and harvest traffic levels. We ask that EDF publish the gravity model and arrange several presentations of the traffic model that allow members of the public to see how the traffic forecast volumes have been derived.
8. We note that agreements are not yet in place to underpin the forecast movement of materials by sea and rail and it appears that the traffic modelling assumes the best case (i.e. least) for the amount of material transported by road. We ask that the traffic modelling also models the worst case scenario of material transported by road.
9. We are concerned that traffic modelling seems to have focussed on the B1122 and A12 junction. We are concerned that the junctions with the B1122 and A12 and A1120 and A12 in Yoxford need to be considered in combination. We ask that they are fully modelled and the modelling is shared.
10. If the A12/B1122 continues to be the route into Sizewell we are concerned that there is no provision for a crossing across the A12 at Yoxford and that there is no provision for upgrading various junctions along the A12 to enable traffic to turn right onto the A12 more safely. We also believe that a traffic control might be needed at the A1120 / A12 junction to allow traffic to move between the two roads. We ask that these are considered.
11. We are concerned that the pollution impacts from the increased traffic along the A12, B1122 and A1120 have not been assessed yet.
12. We are concerned that the proposals do not quantify the increased need for health, social care, policing, education (adult & children) and sport and leisure facilities caused by the construction workforce and families.

13. We welcome the benefits the SZC project will bring in jobs and contracts for local firms in the supply chain but we are concerned these are not really quantified in any estimates. We ask that, at a minimum, estimates are provided for the number of jobs there are likely to be for people from Suffolk, the rest of East Anglia, the rest of the UK and for workers from overseas. We also ask for an estimate of the overall value of contracts to be placed with businesses in Suffolk, businesses in the rest of East Anglia, businesses in the rest of the UK and businesses overseas.
14. We note that the proposals contain no commitment to providing jobs for local currently unemployed and low skilled workers. We are concerned that it is likely to be easier for EDF to bring in skilled workers from outside the local area rather than train local unemployed people. To avoid this temptation, we ask that EDF commit to the minimum number of unemployed workers they will employ on SZC.
15. We are concerned that there has been no quantification of the impact on tourism in the region from the SZC construction. We ask that this is done urgently and shared before stage 3 consultation.
16. We appreciate that the proposals describe an approach to minimising anti-social behaviour by SZC construction workers. However, this is a very significant concern for local people. We believe that EDF need to make a commitment to a quantified and low level of anti-social behaviour incidents and describe the process by which they will hold their workers to account for anti-social behaviour and describe how EDF expect to be held to account for achieving a low level of anti-social behaviour. We ask for firm commitments here and nothing less.

1.3 Some of our concerns relate to information that is missing from the proposals. In fact there is so much information missing from these proposals that we do not think it is appropriate for the missing information to only be provided in the final consultation phase before EDF submit their application. So we ask that EDF carry out an additional consultation phase. We believe that the final consultation, stage 3, should be about revisions to proposals already shared rather than the first presentation of significant parts of the proposals. We note that there have been four years between stage 1 and stage 2 so there has been plenty of time for stage 2 to be much more complete and that the stage 2 consultation for Hinkley Point C was much more detailed.

2. Main Development Site: Environment

2.1 The proposed site is within an area of outstanding natural beauty and several SSSI. Assets that generate tourism and associated jobs. We could not find any dimensions for the final buildings only artists' impressions of the resulting landscape from several locations. It appears that Sizewell C will dwarf Sizewell A & B and be much more visible from the surrounding countryside. The construction site will also be very large and have a devastating impact on the local landscape. The two borrow pits and the stockpile in particular.

2.2 If the proposed development was in a site that was not so visually appealing and did not generate so much tourism and associated jobs then it may have some merits. But it is fundamentally too big for this area of the Suffolk coast. We ask that EDF reconsider the size of development they are trying to make in this location.

2.3 The impact of the development site is made worse by the inclusion of the accommodation campus. It could be distributed around local population centres on land that is less sensitive reducing the size of the construction site. This would have the added benefits of reducing the

increase in traffic on the B1122 from 2400 extra people, locating the workers near to existing amenities on smaller campuses and reducing the social cohesion problems.

2.4 We are concerned about the potential environmental impacts to the Sizewell Marshes and Minsmere levels and are not confident that the assessments that have been shared so far fully understand the issues.

2.5 We are concerned about the impact to the coast from the construction of the jetty and then the impact the jetty and the water in/outlets may have on coastal erosion.

3. Main Development Site: New Access Road

3.1 We believe the B1122 is unsuitable as the main route to Sizewell C. It is a rural B road that has many houses right on the edge of the road and was not designed for construction traffic. It is in an area where tourism dominates and the rural roads are used by walkers, cyclists and people travelling to local amenities. It is not appropriate for this road to be used for an estimated 10 to 12 years for 900 HGV movements per day, buses travelling to park and ride sites, LGVs and workers travelling to and from site and the accommodation campus. As the assumed use of sea and rail to transport some materials is not underpinned by firm agreements it is highly likely the traffic levels will be higher than suggested in the consultation document making the B1122 even less suitable.

3.2 As we do not believe that the B1122 is at all suitable as the route to Sizewell C the consultation question about how to extend the last part of the route into the site is a little academic. However, should the use of the B1122 be absolutely unavoidable the option that might have the least possible environmental impact on the SSSI should be selected. Having considered the analysis at table 7.3 in the main consultation document it would appear that the best option would be the 3 span bridges, i.e. option 3. However in the main document we see no supporting data to inform any of these options. We oppose EDF Energy's preference for option 1(7.4.78).

4. Main Development Site: Managing Construction Materials

4.1 We feel that the size of the proposed borrow pits and a 35 metre high stockpile at Eastbridge will be a massive eyesore. The noise, dust and light pollution for people at Eastbridge will be very bad. For Yoxford the impact is direct for our people as users of the amenities at Minsmere and more generally in an AONB. It is also bad for tourist related businesses in Yoxford. The construction could have a significant effect on tourist visits to Minsmere which will directly impact B&Bs which have a lot of trade from visitors to Minsmere. We ask that EDF consider alternative approaches to the stockpile and borrow pits that do not have such a negative impact on an AONB.

4.2 So we do not agree with any of the options being proposed by EDF.

5. Accommodation: Overall Strategy

5.1 We do not agree that a single accommodation campus at Eastbridge is the best solution for housing non-home based workers and do not agree that this approach would reduce the impacts on surrounding communities. We do not think the rationale provided in sections 5.10.16 to 5.10.23 explains why a single site at Eastbridge is the best solution.

5.2 Siting the campus at Eastbridge does not minimise the transport impacts; it actually maximises them. All the out of work journeys made by the campus based workers would be along the B1122 which is already seeing massive increases in traffic due to EDF's desire to use it for all the other

construction traffic. We would rather the campus was distributed over several sites closer to local population centres with some of the amenities the workers will need. If the campus was further away, we understand the workers would have to be bused to and from site with about 150 additional bus movements per day at peak but that would be a much smaller transport impact for the B1122 than all the out of work journeys. By distributing the campuses and siting them away from the busiest road for construction traffic this problem would be avoided.

5.3 Section 5.10.17 in the consultation document states: “The size [of a single site campus] would generate a critical mass that would in turn allow the provision of a range of amenities to workers. This should make the campus environment more attractive and encourage workers to stay on site, leading to fewer potential problems, in terms of worker behaviour and community disruption. We recognise the logic in this statement but as the consultation document does not describe the amenities that would be provided at a single site that could not be provided at distributed sites it isn’t possible to say whether it is true in practice.

5.4 Whilst we accept the amenities on the campus will reduce the desire for journeys off-campus, we know that the workers will get bored with the same options and surroundings and will want to find other places to relax and other things to do. That is human nature and it wouldn’t be reasonable to suppress it. So it is important that the campus(es) are sited in places where other amenities exist. By siting the campus at Eastbridge it means the biggest social cohesion problems are focussed on the villages of Eastbridge, Theberton, Westleton, Middleton, Darsham and Yoxford. Places where amenities generally mean a village pub and places which have a demographic that is completely at odds with the demographic of the campus based workforce. It would take less than 1% of the campus based workforce to decide to go to the same village pub to totally change its character and alienate the local population. There would also be significant social cohesion problems in Leiston. Its demographic is not as misaligned with the workforce as the villages but it doesn’t have the amenities to handle 2,400 additional people.

5.5 We recognise the need for campus accommodation but think this would be better achieved by having smaller campuses over several sites and locating those campuses near to towns that have more amenities and can handle a subset of the non-home based workforce. We also think that amenities ought to be built in a way that creates a legacy for the local population. For example, 5-a-side football pitches built in the local towns provide a legacy and an opportunity for social cohesion because they can be shared by the workforce and local population during the construction. Building facilities at Eastbridge does not create a legacy if they even remain at all.

5.6 We welcome the proposal of a dedicated accommodation management office but we note that it is only described in general terms and the consultation document contains no firm commitments from EDF about the outcomes the accommodation management office would achieve. The document contains forecasts for various aspects of accommodation use. Will EDF turn them into commitments or at least commit to specific remedial actions if the forecasts aren’t realised?

5.7 Table 5.11 in the consultation document provides data on the supply of tourist bedspaces and forecast peak take up of those bedspaces by SZC construction workers. The data on supply is after “discounts applied”. The consultation document doesn’t make it clear what “discounts applied” means. We assume it means discounting bedspaces that would not be suitable for construction workers but please could this be clarified? In Table 5.11 there is apparently a supply of 335 bedspaces in Yoxford after discounts applied. Assuming Yoxford means the area used in the 2011 census and therefore includes Westleton, Darsham, Middleton and Dunwich this estimate still feels high. Please could the rationale for the estimate be explained?

5.8 Irrespective of the precise estimate we are concerned about planned consumption of tourist bedspaces. If tourist bedspaces are taken up by SZC construction workers then there are fewer tourists in the area which has a negative impact on all the businesses that depend on tourists. We ask that EDF plan to only take genuinely spare capacity in tourist bedspaces and align their demand for tourist bedspaces with the out of season increase in supply. We recognise that this may be difficult but not doing so would represent wilful damage to tourism for EDF's increased convenience.

5.9 We feel that there is an opportunity for collaboration between house builders, EDF and local councils to build and used affordable houses in East Suffolk in locations where they will still be needed after Sizewell C construction. These houses should not all be in Leiston or so near to the site. They should be spread over East Suffolk in places that are commutable during the construction phase but in places where they would still be needed after the construction has finished. We understand this would not remove the need for accommodation campuses or eradicate the use of private rented sector but it is an opportunity to reduce those impacts and create a legacy of the construction phase that is currently being missed. We ask that EDF actively facilitate this opportunity and not just leave it to the market as it is clear that building affordable homes will not happen if left entirely to market forces.

6. Accommodation: Campus Layout

6.1 As we have already stated we do not agree that a single campus at Eastbridge is part of the solution to the accommodation challenge so none of the proposed options is suitable.

7. Transport Overall Strategy

7.1 We understand the broad principles of the strategic approach. The problem is, that with almost all the component elements of the strategy the data needed to demonstrate that these individual components would be effective is missing, misleading, or inadequate. The sources of data have not been shown and in some cases the data itself is seriously questionable, as will be explained in subsequent responses. The overall claim that these proposed measures will mitigate the impact on the local communities and environment, and indeed allow the effective construction of the project, is not proved. The measures do not meet the concerns raised in the 1st consultation as they claim to do.

7.2 The stage 2 consultation document mentions a gravity model that EDF are using to help determine the distribution of home-based workers and non-home-based workers. The consultation document does not disclose any details of the key features of the gravity model (e.g. how many people in each location) or the rationale for its assumptions so we cannot reassure ourselves that the gravity model feels realistic. As the worker traffic movements are derived from the assumptions in the gravity model we also cannot reassure ourselves that the traffic modelling feels realistic either. We would ask that EDF disclose details of the gravity model and the traffic modelling and explain how they have arrived at the traffic volumes they have shared so far.

7.3 The road traffic impacts assume that 40% of the materials needed (by weight) are transported by road but the agreements are not yet in place to take the required portion by rail or sea. We are concerned that agreements won't be reached or that, if they are, once the construction is underway the forecast split between road, rail and sea won't be achieved and more traffic will end up on the road. At that point it will be too late to do anything about it and the local population will have to suffer worse than forecast traffic impacts. So we insist that EDF model the worst case scenario for road traffic as well as what appears to be the best case they are modelling at the moment.

7.4 When discussing traffic volumes the document uses a mix of busy hour and average volumes for different roads and different scenarios. In order to properly capture the road traffic impacts we ask that the busiest hour of the busiest day in the busiest period of the year is modelled for all roads with all data provided. We have no objection to this being done along with average traffic volumes as average traffic volumes contribute to the overall understanding but the busy hour/day/month needs to be covered as well. We are concerned about the traffic when Sizewell C load is added to the peak of tourist traffic and the traffic associated with the harvest. In the case of harvest traffic the speed and size of the vehicles will be much more of an impact than the volume.

7.5 In the consultation document EDF describe their ability in non-specific terms to manage HGV movements. Generally we would ask that EDF are more precise about what they will and will not allow HGVs to do using their management capability. More specifically for Yoxford we ask that EDF give a firm commitment to prevent HGVs from using the A1120 as a route to the construction site and describe their process for dealing with breaches of this commitment.

8. Transport: Rail

8.1 We understand and support the logic of trying to use the rail network to take freight and people off the small local roads. However there is a real question as to the capacity of the existing network to carry an increased volume of rail traffic between Ipswich and Saxmundham as so much of the line is only single track. The phrasing in sections 6.4.39-41 is wholly inadequate by way of explanation as a plan cannot be supported, or opposed, merely on the basis of vague “continuing discussions”. At this stage, after 4 years, Network Rail should be able to articulate the maximum capacity that could be made available to EDF whilst at the same time maintaining their current passenger services to an acceptable level. This is a function of the network capacity and not of EDF need. Without this information the contribution of the rail route is not credible. The use of the current passenger service, often of only 1 carriage trains, and at the most 3 carriage trains, would only be viable if the service was considerably improved. Incidentally it would only need 1 freight train to break down on a restricted part of the route for the whole service to collapse.

8.2 Until the issue of proven capacity is resolved the 2 options on offer are academic. However on balance option 2 would seem to be preferable as EDF have already admitted that this land is going to be used anyway, and it might have a less dramatic impact than driving a new rail line through agricultural land.

9. Transport: Sea

9.1 In dealing with sea issues generally, as well as sea transport issues, pages 143 to 145 of the main consultation document appear completely lacking in specialist evidence concerning the impact of the current proposals on this fragile coast line already subject to erosion and flooding. The wording is vague supposition: for example 7.5.36 “no effect on coastal processes is expected.....”. Specialist advice needs to be available for all to see otherwise suggestions are made on mere assertions. Therefore without objective professional evidence all options are inappropriate.

9.2 Reading the documentation it seems that option 3 (BLF) has to be built anyway and will be in use for the 60 year operational span of the power station. Therefore the wording designating three options is disingenuous. As option 3 (BLF) will happen anyway it is a question of what other option to choose in addition to option 3(BLF). Should the project go ahead it makes sense to make best use of option 3 (BLF) for the construction as well as operational phases, although it is noted that this will require the dredging of a deep water channel. This highlights the need to see objective advice on the evidence of coastal impact.

9.3 We understand that the jetty options 1 and 2 are being suggested in order to facilitate the movement of bulk materials as an alternative to their movement by vehicle or rail. Therefore these jetty options should not be considered in isolation but in tandem with the road and rail options. Consequently there needs to be concrete evidence of required capacities and the ability of each element in question to provide that capacity.

10. Transport: Park and Ride

10.1 We are surprised that the northern park and ride site is larger than the southern one (1000 spaces v 900 spaces). We expected more of the commuting workforce to come from the south rather than the north and therefore expected the southern park and ride to be larger. However, as the gravity model has not been shared it is not possible for us to make any assessment or comment.

11. Transport: Road Improvements – A12

11.1 We have serious reservations about EDF's approach to highway improvements. The public does not have access to the traffic model upon which all their arguments are based. Their claims are at significant variance to the extended experience of the general public and local traffic monitoring groups in this area. The A12 is a busy spine road between Ipswich and Lowestoft. The volume of traffic of all types is considerable. Traffic flows are characterised by significant peaks and troughs associated with work traffic, school traffic, tourist and farm traffic and HGVs. In addition to the daily time variations there are very important seasonal variations associated with the farming calendar, and the tourist season. There is no evidence that the traffic model has taken account of these big daily and seasonal variations, but it has simply produced an average figure which bears no relation to reality, but suits EDF's purposes. Serious congestion already occurs along the A12 especially at choke points and where lateral roads feed onto the main road. There is already concern about the ability of emergency services to gain quick access in a crisis, especially when dual carriageway ways reduce to single carriageway. None of this reality is reflected in the main consultation document. Therefore options 1, 2, 3a and 3b, as currently presented in the questionnaire, are all inappropriate.

11.2 Option 4 seems to be the most useful suggestion but is also inadequate/inappropriate and would only partially address the problems in this area. Little Glemham for example would continue to be a choke point.

11.3 The main consultation document devoted from pages 242 to 273, (31 pages), to the "Farnham area problem". In contrast hardly any attention is paid to the Yoxford problem. The point being that any easement achieved by remedial bypasses in the Farnham area will simply move the problem further north to Yoxford where there are already frequent problems at peak times.

12. Transport: Road Improvements – Yoxford / B1122

12.1 In Yoxford we are very concerned about the proposed volume of traffic and the amount of HGV and bus traffic on the B1122. Some Yoxford residents live along this road and close to the roadside. Most Yoxford residents use the B1122 by car, bicycle or on foot as part of walks. Even if the road theoretically has sufficient capacity for the number of vehicle journeys, it is not suitable for the proposed traffic mix that is so heavily skewed towards HGVs and buses. This is even truer if the proportion of freight delivered by road increases due to difficulties in using rail and sea. The noise, vibration, pollution and difficulty using the road as pedestrians, cyclists and drivers is a very high price to pay for the people who live along the B1122 in Yoxford and the other villages along the route and people in the local area who need to use the B1122. The same comments also apply to the A12 through Yoxford as it will carry the same construction traffic on a road that is already much

busier than the B1122. We ask that EDF reconsider the choice of the B1122 as the main route to the Sizewell C site and look for better options. The D2 relief road has been an option since before Sizewell B was constructed.

12.2 The stage 2 consultation document describes the roundabout to increase the capacity of the A12/B1122 junction but there is no description of the impact on the A12/A1120 junction. We are concerned about the amount of traffic at the combination of the A1120/A12 and A12/B1122 junctions and the potential for queueing traffic at one of those junctions to extend back to the other junction and create gridlock situations. It is already difficult for southbound traffic on the A12 to turn right onto the A1120 and traffic backs up behind these vehicles beyond the A12/B1122 junction today. This problem is worse during the peaks of tourist traffic as it is a common route for tourists. The proposed increase in traffic on the A12, A1120 and B1122 along with the proposed roundabout has the potential to cause significant tailbacks and delays. Because the gravity model and more detail on the traffic modelling haven't been shared we cannot tell how frequent and long the tailbacks will be. We also don't know how they will increase with organic traffic growth during the construction period or how bad they will be if the road based freight ends up being greater than the 40% forecast currently being used. We ask that the gravity model is shared and that a traffic model of these combined junctions is shared so we can see the potential impacts.

12.3 We believe that increased traffic volumes along the A12, A1120 and B1122 and the increase in queues at the A12/B1122 and A12/A1120 junctions will cause an increase in air pollution to unacceptable levels. We do not think it is reasonable to introduce new air pollution problems and damage the health of people in Yoxford so we ask that EDF model the impacts of their plans on air pollution and describe the mitigations they will take to reduce it to acceptable levels.

12.4 For the reasons described above we do not believe the A12/B1122 is a suitable route into the Sizewell C site and EDF should look at other options.

12.5 We believe the increase to traffic volume for the A1120 is underestimated. Home-based workers will use the A1120 to travel to the northern park and ride from Needham Market, Stowmarket, Bury, Newmarket, Cambridge and further as well as from villages along or fairly close to the A1120. Non-home based workers from the Midlands and the North will also use the A1120 for journeys to and from the accommodation campus. Some LGVs will also use the A1120 to service the accommodation campus and for other aspects of the construction. Disclosure of the gravity model would help ensure the traffic forecasts are realistic.

12.6 If the A12/B1122 continues to be the route into the Sizewell C site we ask for the following to be considered:

12.7 It is difficult today for local traffic to turn right from Yoxford onto the A12 southbound. As the traffic volume on the A12 will increase with the SZC construction this problem will get worse and turning left onto the A12 northbound will also become a problem. We ask that EDF models the impact on vehicles turning right onto the A12 southbound from Yoxford and determines whether some form of traffic control is needed at the A1120/A12 junction.

12.8 Along similar lines it can be difficult for pedestrians to safely cross the A12 near to the A12 / A1120 junction. This will get harder as traffic volumes increase. We ask that EDF consider the need for a pedestrian crossing at or close to the A12/A1120 junction.

12.9 It is difficult for traffic to turn right out of the B1121/Main Road onto the A12 northbound at Kelsale and similarly turning right out of Carlton Road onto the A12. These problems will get worse

with the increase in traffic proposed by the SZC construction. These junctions need to be enhanced to include a central refuge for one or two cars turning right so they are similar to the B1119/A12 junction.

12.10 The same problem exists at the A144/A12 junction which will see an increase in traffic heading to the park and ride at Darsham. It also needs enhancing to include a central refuge for one or two cars turning right.

13. People and Economy

13.1 The stage 2 consultation document does not quantify the increased need for health, social care, policing, education (adult & children) and sport and leisure facilities caused by the construction workforce and families. The impacts need to be described accurately and the mitigation that will be provided for the increased cost of providing these services to the local population. Yoxford Parish Council are concerned that something that could have a big impact on the local population is being left so late in the process. We assume this will be covered in stage 3 but note that for this area the consultation effectively becomes a one stage process as no meaningful data will be provided until stage 3. EDF should consider ways to consult on this in advance of stage 3.

13.2 The gravity model is crucial to a lot of the impacts of the Sizewell C construction. Whilst the way the model has been constructed is shared its key features are not. The Yoxford Parish Council feel that the key features of the model must be shared for an effective and transparent consultation to take place. In particular for the non-home based workers we would like to know which region they are from with enough accuracy to determine the route they would take into and away from the region when travelling to/from home. We would also like to know how many of the non-home based workers will be from overseas. For the non-home based workers who do not stay on the campus and the home based workers their approximate local location with enough accuracy to see how many workers will be in different local areas and to understand their likely route to the park and ride locations or site.

13.3 There are about 3000 tourist jobs located in the Suffolk Coast and Heaths area of outstanding natural beauty around Sizewell. There are almost ten times as many tourist jobs elsewhere in Suffolk that support people who visit the AONB during their visit to Suffolk. For some of those visitors the AONB is their primary purpose for visiting Suffolk (e.g. to visit Minsmere nature reserve). People in Yoxford have jobs and run businesses that depend on tourism. The Parish Council is very concerned that EDF is only “working to identify the key reason tourists come to the area and the extent to which Sizewell C could have an effect on the attractiveness of the area for tourists”. It is clear that Sizewell C and its construction in particular will have a significant negative effect on tourism in the area and the council is concerned for the jobs of people in the parish and other parishes in the area. Quantifying that impact and identifying mitigation should already have been done. We ask that the quantification is done urgently and mitigation ideas are proposed and feedback invited in advance of stage 3. So the stage 3 proposals become a response to the feedback rather than the presentation of new problems.

13.4 In section 5.5.16 EDF commit to commission a visitor survey to help understand tourism impacts. It is important that this survey is, and is seen to be, impartial. EDF would be the commissioner and has a vested interest in the tourism impacts being stated to be as low as possible whilst the tourism sector has a vested interest in the survey establishing the impacts are as large as possible. We ask that the survey methodology is reviewed by and agreed with key players in the tourism sector and the two local councils (SCC & SCDC) before it is conducted. That way all parties

should be able to accept the results when they arrive and can move quickly onto identifying mitigation steps.

13.5 In section 5.5.15 we note that EDF identify accommodation supply, the image of the area, perception and 'brand', and effects of traffic levels as potential impacts on tourism. We hope that the visitor survey will help quantify some of these issues. We also note that the traffic surveys carried out so far have not occurred during the peaks of tourist traffic. People in Yoxford notice the increased traffic levels in August particularly along the A12, A1120 and at the junction of those two roads. We think that the traffic modelling should cover that August peak period to establish the potential for delays on the local road network. One of the attractions of Suffolk is that it is currently fairly easy to travel by car between the local attractions and sites of tourist accommodation. The traffic impacts of the Sizewell C construction could have a significant detrimental effect on tourism.

13.6 The sections on jobs and skills and the supply chain describe potential local and national benefits from the project. We welcome these effects but ask that they be quantified. At the moment the only fact in this section is that at HPC 83% of the site preparation contracts by value went to Somerset based companies. At a minimum we ask that EDF forecast how many of the workers in the construction phase will be from overseas, Suffolk, the rest of East Anglia and the rest of the UK, how many of the workers in the operational phase are from overseas, from Suffolk, from the rest of East Anglia and from the rest of the UK and how much of the contracts by value will be placed overseas, in Suffolk, in the rest of East Anglia and the rest of the UK. We appreciate that these can only be forecasts but they would give a feel for where the benefits from the project are likely to be experienced. As the number of jobs are the only real upside for a project that has so many downsides for the local population it feels a little strange to have to ask for it to be quantified.

13.7 The residents of Yoxford are concerned about the potential for anti-social behaviour from some workers outside working hours. People remember the Sizewell B construction for the excessive drinking and associated noise and violence and even prostitution in Yoxford. We welcome the steps EDF are proposing in their sections on community cohesion and safety but would like to see more detail and we would like the mitigation steps proposed by EDF to be underpinned by a commitment to a measurable and low level of anti-social behaviour incidents and a quantifiable process to deal with them.

13.8 We think there needs to be a stronger and quantified commitment by EDF to train and employ local unemployed, under employed and low skilled people so that there is a genuine jobs legacy for the local population. The proposals contain warming words about the approach EDF would take but there is no commitment to actual outcomes. We know that the whole local unemployed population cannot be transformed into the workforce EDF require but some of them can and there needs to be a commitment to achieve it.

13.9 We ask that EDF provide firmer commitments about how they will help in the ramp down phase of the construction so that there are jobs for local people to go to. This could be encouraging other businesses to locate in the region and to help with the setting up of new businesses.

13.10 We are concerned that the construction phase will cause the displacement of local tradespeople who are already fully employed in the local market. This will create skills shortages and price rises for the local domestic market and for local businesses in the building trades. We would like EDF to quantify the local spare capacity in the various trades they require for SZC and plan to only consume that spare capacity.

14. Consultation Process

14.1 After taking 4 years to progress from stage 1 to stage 2 and so many comments complaining about the stage 1 consultation being run over the Christmas period we are worried by how to interpret the stage 2 consultation being run over the Christmas period again. To be unaware of the antagonism this would cause is sheer incompetence and demonstrates a disregard for all previous feedback. To anticipate the antagonism but go ahead anyway is arrogant and demonstrates a disregard for EDF's impact on the local population. We have to draw our own conclusions about EDF's sincerity in these consultations.

14.2 Analysing the document is an enormously time consuming task, made significantly more difficult, notwithstanding the thousands of words employed, by noticeable lack of detailed quantifiable information. Blandly reassuring words, and anodyne phrases unsubstantiated by data are plentiful. Reliable and objective information seems in short supply throughout the part 2 consultation document. This is in distinct contrast to the Hinckley Point phase 2 consultation, the documentation for which was more transparent, contained appropriate detail and addressed seriously local concerns and proposed effective mitigation for those concerns. Ironically the Hinckley consultation drew upon the experience of building Sizewell B.

14.3 Many thoughtful suggestions expressed during the part 1 investigative process have been ignored. All the key changes since stage 1 consultation appear to benefit EDF and fail to address the concerns of the local communities. Which leads one to query whether any attention is indeed going to be paid to the major concerns that are now being raised, some for the second time, via the part 2 consultation process.

14.4 The summary document and particularly the phrasing of the questionnaire over simplifies the issues involved and has a tendency to lead people in a particular direction and sign up for options that are not workable.

14.5 Having attended a number of the presentations and related public meetings the serious concerns raised have invariably generated bland, condescending responses that fail to address people's concerns, or people have just been stone-walled. The consultation process has not inspired confidence that EDF is genuinely attempting to mitigate the considerable negative impact on local communities, as they are legally required to do under the planning process.

14.6 We have already stated that we are disappointed by the lack of clarity on key issues, the lack of data and the lack of firm commitments from EDF. We do not think the stage 2 proposals are sufficient for the penultimate stage of the pre-application consultation process. So we ask EDF to please either repeat stage 2 with more information or add an extra consultation phase before phase 3.

14.7 Please could you also make the diagrams and charts in the report readable? Many are blurred and impossible to read.

Councillor Paul Ashton – Yoxford Parish Council

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