

Issue Specific Hearing 2 (ISH 2) and Issue Specific Hearing 3 (ISH 3) Traffic and Transport

These submissions are made by Josie Bassinette on behalf of the Walberswick Parish Council.

Number: 20025708

The following is a summary of oral submissions and other issues of concern being provided in writing. I hope that it will be acceptable to the Planning Inspectorate to have combined Part 1 and Part 2, held over the course of two days, given that for the local community that I represent, the agenda items on Traffic and Transport tend to be interlinked. For ease of reference, headings are aligned with relevant agenda items.

1. **Early Years (Monitoring and Control Mechanisms and Transport Assessments)**: Of the many serious concerns about the development proposal, the greatest one for the community I represent is the applicant's strategy to provide no mitigation in what it terms "early years". This is a disastrous approach both in terms of being able to deliver the project in a timely manner, and because it amplifies the negative impacts and hardship on every segment of the local community. Since the earliest days of the consultation, EDF has been challenged by consultees to put in place the mitigation measures in its traffic and transport strategy (as flawed as they may be) prior to beginning its work at the main site. EDF has consistently refused and we heard most cynically at the ISH that EDF believes that "urgency" means that it can simply ignore normal good practice in this regard. It must be recognised as unacceptable to allow any development to go forward without the associated developments being fully in place. This is the only dependable way to guarantee that the associated development is completed and to avoid against "early years" simply spilling over into 'middle years'. Given the applicant's track record in underestimating the time and cost of building nuclear plants, there should be no possibility of the DCO going forward without a commitment in the Deed of Obligation to put all mitigation in place prior to commencement of work at the main site.
2. Concerns about early years is also related to the failure of EDF to adequately model early years traffic. For villages and towns north of the site, including Walberswick, we are extremely concerned to learn of the intention of EDF to use Lowestoft as the starting point for AILs and, in particular, that these AIL movements will be concentrated in the early years when EDF intends no mitigation to be in place. AILs coming down the A12 from Lowestoft could have a catastrophic effect on the speed of traffic and in congestion that would spill into surrounding roads. Much of the A12 route from the north is single carriage way. There is also heavy use of the A12 and B1125 by slow-moving tractors and other large farm equipment particularly in the area from A1095 in the north to B1122 in the south. It is wholly unacceptable not to mitigate the 'early year' impact of the combination of AIL (for which EDF has no accurate number in the 'early years') and other Sizewell HGVs, lighter vans and workers, along with farm equipment and other current users of the road network. In my oral statement, I also aligned myself with the comments made by Mr. Collins on this subject.

3. Finally, on early years, the applicant claims that it will “hold back” HGVs if they become too many for the B1122 (or A12). But as the Freight Management Facility will not have been built, where would these HGVs be held? The applicant has provided no answer for these early years risks.
4. **Freight Management Strategy**: We remain unconvinced that the freight management strategy relating to both the main site and that for the associated development sites is deliverable as set out by EDF. We believe that these strategies for rail and sea, meant to remove wholly unacceptable numbers of HGVs from the road network, cannot be delivered as suggested by the DCO and subsequent amendments made by the applicant. We heard nothing from the applicant during the ISH that offered reassurance that their highly optimistic scenarios for freight movement by rail and sea can be met. On the contrary, we heard that the caps used will be insufficient to limit impact on the B1122 and that the applicant’s modelling on the A12 impact bears little resemblance to the reality of the Suffolk roads. Indeed, we heard from nearly every interested party including Network Rail, the police, the emergency services, the highway agency and Suffolk County Council, along with those from the area who know these transport links the best, that the strategies and modelling is inaccurate and inappropriate and that proposals offered by EDF are insufficient and need to be redone and then reassessed.
5. **Freight Management Strategy (Movement by Sea)**: We would like to associate ourselves with other IPs that pointed out the weakness of the BLF being offered as a realistic alternative to road or rail transport. We heard the applicant during the ISH state that the BLF would be largely inappropriate for bringing in aggregate since there was insufficient space at the site for storage. We also heard that it would be largely inappropriate for AILs and that its use would also be weather dependent. The applicant also argued that it would not be bound by commitments to use sea for freight and that it would be free during construction to determine whether it would use rail, road or sea. This statement negates the usefulness of any BLF and we see the late proposal by the applicant for a partial sea strategy as a cynical attempt to deflect criticism of its road led strategy. It underlines the unworthiness of the caps, monitoring and mitigation measures proposed for road as the intention stated by EDF is to retain the ability to use the road network to the maximum. The development should not be permitted under such conditions.
6. **Transport Strategy relating to Associated Development Sites**: We remain concerned about EDF’s proposals which specifically exclude from its assessments, caps and monitoring the HGV, bulk material movements and other vehicles and worker numbers from the associated developments. This fact would seem to invalidate the applicant’s transport assessments and modelling. Even one of these associated developments will create congestion on the A12 and rat-running on the B1125/B1122 and the network of small roads connected to them. In excluding these impacts in its caps and modelling, the applicant is conspicuously seeking to under-represent the impact its development will have on the roads. With such a flawed

approach, it then becomes impossible to offer meaningful mitigation given that the true numbers of vehicles are clearly under-represented.

7. **Traffic Assessments (Seasonal Traffic Effects):** We believe that EDF's modelling and approach does not adequately take into account seasonal traffic effects. As shared at the ISH, traffic flow into Walberswick via the B1387 off of the B1125 (ie the only way to enter Walberswick), increases substantially in warmer months. Using data collected by the Walberswick Safe Space initiative in 2018, an average of 400-500 cars enter the village daily in November. In the summer season, this number increases to some 1400 cars (ie a 300% increase). This translates into 2800 vehicle movements, from Walberswick alone, crossing or joining the B1125 and then entering the A12 either to the north or south. Similar increases are the norm in all the coastal communities and therefore the impact on the A12, B1125, B1122 and other connecting roads needs to be assessed using May-September numbers. EDF has not taken proper account of this as far as we can see. EDF's assumptions and modelling on the A12 corridor is simply not believable. No one who lives here or uses the A12 would say that EDF's figures on impact – suggesting voyage delay impacts of under a minute -- are anything but risible. Moreover, EDF's modelling seems to keep ignoring what happens in the early years when no mitigation is in place. We wonder if EDF has modelled when tractors and other farming vehicles are on the A12 which is a common occurrence and which often coincide with peak visitor traffic flows.
8. **Transport Assessments (Northern Park and Ride)** EDF has not appropriately modelled the traffic effect of the Northern Park and Ride. First, they have not modelled the impact of the HGVs and workers coming to build the site in its overall transport strategy as already noted in paragraph 6 above. Second, the applicant claims that the Park and Ride will have no impact on the rail crossing immediately south in terms of tailbacks when trains are crossing, nor on the difficulty of people trying to access the rail station from the A12 north and south, nor of getting out of the car parks at the Darsham Station into the heavy traffic flow of worker cars and buses leaving the Park and Ride, nor of the increased HGV traffic coming from the north, heading to the B1122 at Yoxford. We have seen no means set up for rail passengers to safely cross the A12 from the Darsham Station car park to the Station platform despite the flow of 1500 worker cars, hundreds of buses and other vehicles now driving past the Darsham station every day. It is already dangerous and difficult for pedestrians to cross the A12 from the Darsham Station to the car park on the other side. This will be impossible to do with any degree of safety without appropriate mitigation if the project goes forward. We noted that Network Rail expressed similar reservations on safety of the train crossing at Darsham. EDF also does not acknowledge the difficulty that the local population will have in reaching the rail station past the park and ride and the large number of HGVs, buses and passenger cars that will be added to that part of the A12. We support the proposal by Hevingham Hall's representative that workers must be directed to an appropriate car park and not be left to drive to the Northern Park and Ride if this is not closest to their home. We also support the question raised on the need to demonstrate the

Northern Park and Ride needed to be as large as proposed and that EDF needed to clearly demonstrate the actual need of the park and ride of this size and location.

9. **Consideration of local transport impacts:** We thank the Inspection Panel for highlighting the issue of the B1125. The B1125 is a direct route, parallel and to the east of A12, coming from the north into the B1122. Today, workers at Sizewell use it to avoid the A12 despite the B1125 being a cycling route and car route for local use including emergency vehicles. There are many choke points, tight and blind turns on the B1125 as it makes its way to the B1122. We believe that the B1125 will be the route of choice of Sizewell C workers, certainly in the early years. Workers living at the proposed campus at Eastbridge will also use this route when coming to/from the north. It will also be the main rat run for all non-Sizewell C traffic who will need to avoid the congestion and stoppages on the A12 which will be caused by the Sizewell C and all its associated development. Movements of AIL and HGVs from Lowestoft going south on the A12 to the B1122 will most certainly push other traffic onto the B1125. EDF has not assessed this impact and has, until now, ignored any mitigation measures. The intersection of the B1387 and the B1125 is already a site of accidents given the speed of cars on the B1125 and the blindspots when crossing the roadway. Speeding is endemic. We note the data provided by the Westleton Parish Council in this regard. Moreover, the traffic numbers to these communities, including Walberswick, double in the summer months as set out in paragraph 7 above. The B1125 is also a major cycling route today and the only route to access from the north the green lanes and cycling routes south to Aldeburgh. We welcome the statement made by the Applicant at the ISH that they are now prepared to work with Walberswick and Westleton Parish Councils to include the B1125 in its mitigation plans. These should include mitigation for cycle safety, speed and controlling of traffic numbers including worker numbers and early years. We expect these to be discussed with and agreed with the Parish Councils at the earliest opportunity and included in the Deed of Obligation if the development is to go forward.
10. **Monitoring and Control Mechanisms for Traffic and Transport** We would like to associate ourselves with statements made by many interested parties that spoke at the ISH including Suffolk County Council, Suffolk Constabulary, emergency services, the Highway Agency, TASC, Stop Sizewell C and others who expressed grave concerns about Governance shortfalls. Like others, our concern is two-fold. First, EDF's caps and what they are monitoring is inadequate. This is because of caps that have been designed so as not to be reached, exclusion of ancillary development in caps and monitoring, and inappropriate baselines. The result will be an absence of meaningful controls. This is compounded by inappropriate governance structures. In the TRG, for example, EDF holds enough seats to prevent a quorum thereby blocking the TRG from meeting. Moreover, the governance mechanisms are largely advisory or are designed to operate on 'consensus' and therefore have no power of binding constraints nor ability to compel the developer to do anything which it does not want to do. This must be addressed if the development is allowed to go forward. The arrangements are also inappropriate to deal with issues as they arise given that they require lengthy delays to processes and decisions, making timely and just resolution less likely. In addition to our concerns about the role of EDF, we

remain concerned about the dominant role of East Suffolk Council (ESC) in governance structures whilst simultaneously being a recipient of many of the mitigation funds promised by EDF. This creates a conflict of interest and we do not believe that ESC is sufficiently independent of EDF, being the only local body that has publicly backed Sizewell C and which will benefit as the recipient of mitigation funds. As we saw with the felling of Coronation Wood, ESC has shown itself willing to act against the interests of its constituents in support of EDF and the development. Therefore, we would like to see mitigation funds and responsibilities dispersed to address this conflict of interest, perhaps through Suffolk County Council with a consortium of local Council representatives, including ESC and Parish Councils and other key stakeholders.