

Issue Specific Hearing 14 (ISH 14)

These submissions are made by Cllr 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 where the points could not be made during the hearing itself. Headings are aligned with relevant agenda items.

Agenda Item 2: The extremely late and material change in the water strategy represented in Change 19 made informed input of the implications of this item very difficult for IPs. We are of the view that the information provided by Northumbrian Water before and at the hearing indicates that there is no assurance of a potable water supply for consumption and industrial use at the Sizewell C site during construction or operation. As will be put forward again in ISH15, the risks of lack of water are overwhelming and the impact that this would have on the residual water resources left for the communities if the nuclear reactors were built, cannot be mitigated. Therefore, the DCO related to water strategy is inappropriate.

Agenda Item 3a-d: As a community that will suffer the impact of the construction of the project for over a decade, we support and reinforce the view of SCC that there can be no limit on the enforceability of the Deed of Obligation on any transferee or grantee. This is particularly critical because of the proposal by EDF that they will not put in place any mitigation measures in the “early years”. Such an approach is already contrary to good development practice. Without iron-clad enforceability, it would be all too easy for the measures – as insufficient as they are – to be reduced, delayed or cancelled.

In addition, because Network Rail and National Grid are unwilling to accept enforceability of the DoO on themselves, the requirements on EDF or its transferee or grantee need to be even more stringent. If, for example, Network Rail cannot deliver on EDF’s proposed rail strategy, as flawed as it is, then the pressure on the road network will be enormous and well beyond what EDF has presented in its DCO. At the same time, it would seem highly unlikely that the SoS, once having approved the start of the project, would be able to stop it because of the failure of the transport strategy. This would then ensure a delayed delivery of the nuclear station as well as incredible and long-lasting misery on the surrounding communities. This further indicates the need for maximum levels of enforceability.

Additional Commitments made by the applicant with regard to transport mitigation not yet reflected in the DCO and DoO at the time of ISH14: At ISH 2 and 3, under discussion of local transport impacts and monitoring and control mechanisms, the applicant made a commitment to meet with local communities along the B1125 corridor, including Westleton, Blythburgh and Walberswick, in a belated acknowledgment that there would be impact caused by worker traffic and light good vehicles going to the main site and that mitigation would now need to be considered. Because of constraints on EDF’s time, the meeting with Walberswick Parish Council representatives did not take place until 20 September 2021 meaning it was too late for us to raise this specifically with the Planning Inspectorate in relation to ISH 14 and to ensure that the proposed mitigation was incorporated in the DoO.

Therefore, we are including here the items that we view as necessary to be included in the final DCO transport strategy and the DoO in relation to the B1125:

Background: The B1125 is currently used by workers going to Sizewell A/B as it is the most direct route from the north. All traffic in and out of Walberswick must use the B1387/B1125 junction. This junction is already recognised as dangerous, particularly during peak rush hours on the B1125 and during the approximate 3-fold increase in traffic that occurs during the months of May-September when visitor numbers along the coast balloon. If the Sizewell development goes ahead, 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 to go to points north. It will also be the main rat run for all non-Sizewell C traffic who will seek to avoid the congestion and stoppages on the A12 which will be caused by Sizewell C and all its associated development including the Park and Ride at Darsham. 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 in its mitigation planning. In our 20 September meeting with EDF, we explained why both speeding and heavy use from Sizewell C will make the B1125/B1387 crossing and turning particularly dangerous and difficult and mitigation was essential.

After crossing the B1125, the B1387 ends just beyond at a T-junction with the A12. This small stretch of B1387 is prone to serious flooding throughout the winter. Use by adjoining farms means mud and heavy farm equipment regularly block the road. Farm equipment entering and exiting the A12 can block both the B1387 and the A12. With Sizewell C, this route will become more heavily used and is insufficient in its current condition. At the T-junction with the A12, when traffic is light, the turning – even to the right – is manageable. During busy times now, this turning causes tailbacks on both the B1387 and the A12. With the increase in the Sizewell C traffic coming from the north, including (i) from Lowestoft Port, (ii) water tankers if Change 19 is accepted and (iii) thousands of workers going both north and south during the early years and then from the Darsham Park and Ride, this turning will be especially dangerous and difficult.

To address these problems, the following mitigating actions, as discussed with EDF, are required:

1. EDF should commit with SCC to the straightening of the offset at the B1387/B1125 junction. This is necessary prior to the start of “early years”.
2. EDF should commit to the monitoring of traffic on the B1125 as part of their responsibilities along with the B1122 and A12 so that issues of excessive use, danger and speed can be addressed. We believe that it is EDF’s responsibility to undertake this monitoring and reporting and that it should not be the responsibility of local communities to monitor Sizewell related traffic and to be dependent on approaching the Traffic Advisory Group for redress which would be uncertain at best.
3. We have asked EDF to be explicit in its contract with its workers and deliverers of light goods that they are expected to use the main A12 route and not the B1125. This is essential at the start the “early years” prior to the building of Northern Park and Ride.

4. The B1125 is a major cycling route today and the only route of access from the north to the green lanes and cycling routes south to Aldeburgh. EDF needs to develop a proposal to protect the safety of cyclists from speed and intimidation of heavy use by Sizewell C workers and light good vehicles as well as rat running to escape Sizewell C initiated traffic congestion on the parallel A12.
5. At the B1387/A12 junction, improvements are necessary to allow cars to exit the B1387 which, at a minimum, would entail the creation of separate turning lanes to the south (left) and north (right). Additional measures, on the A12, such as a right turn lane, may be required to improve safety and avoid tail backs from cars on the A12 trying to turn right into the B1387. If this section of the B1387 becomes more heavily used, road improvements to control flooding will be necessary.
6. We welcome the proposals EDF has discussed with Westleton to reduce speeding including gateways, pedestrian crossings and the like. These are welcome, but no means sufficient to address the problems caused by the proposed development.

Agenda Item 8: As with the Agenda items discussed above, we strongly oppose the use of “reasonable endeavours” by the applicant as was set out by SCC at ISH 14. We urge the Planning Inspectorate to reject the proposal by the applicant that they retain “reasonable endeavours” and add to this long-stop dates for the delivery. In our view, this proposal by EDF makes the situation even worse as it would provide the developer the opportunity to be even more delayed in delivering the mitigation measures necessary to end the extraordinarily negative impact on the local communities of the “early years. Normally, long-stop dates are provided to allow one party to break out of its contract if certain deliverables are not met. In practice, it is rare for the addition of a long-stop date to advance the delivery date! In this case, a long-stop date simply means that EDF can delay any/all mitigation until a date BEYOND the already unacceptably delayed delivery of mitigation given that SCC would have no remedy before then. If the long-stop date allowed SCC to cancel the entire project, it may be appropriate. But to use it as a date by which SCC could begin to take action against the developer is a risible suggestion. EDF must be held strictly to account for all actions in the DoO and that these be delivered on time and as promised.

If EDF wishes to retain “reasonable endeavours”, then all mitigation must be built prior to the start of construction.

We agree with other IPs that provided written input or oral submissions at ISH 14 that the proposed working groups do not provide sufficient protection against the failure of ‘reasonable endeavours’. These issues, raised at ISH 2/3 on monitoring and control mechanisms, remain unsatisfactory.