

JOHN SUTHERELL: REGISTERED NUMBER 20026479 AND AS COUNCILLOR REPRESENTING YOXFORD PARISH COUNCIL REGISTERED NUMBER 20026527

HARD COPY OF ORAL CONTRIBUTION AND ADDITIONAL COMMENT TO ISSUE SPECIFIC HEARING (ISH) 12 ON WEDNESDAY 15 SEPTEMBER 2021

**Oral Submission.**

I am grateful to the Inspectorate for the opportunity to contribute to the discussion. I am speaking today as the Councillor representing Yoxford Parish Council, as well as a personal Interested Party.

My specific oral contribution was on **Item 2 i: Community Safety – Policing of the Development:** As police liaison officer for Yoxford PC, I support the concerns of Suffolk Constabulary and also the points made by Tim Beach of Snape Parish Council. In particular:

- While reassured to learn that it has been agreed that the Police were now to be full members of the Transport Review Group, I remain concerned, like the Police, with the Governance arrangements. With the numbers of the Applicant and the Public bodies being balanced, there is no way of making decisions except by consensus. The SCC needs to have a casting vote.
- Secondly, I am concerned that the TRG as presently envisaged does not appear capable of proactive traffic management nor any direct communication with the local communities which will be most affected. It is important that a proactive forum exists in which the police can have prompt decisions made to address operational policing matters.
- Thirdly, I note the significant lead time (18 months) to train up traffic police to back-fill the more experienced officers required to make up the AILS escort teams. It is important that this capability is developed *before* the project starts and the capability is required.
- It was not clear to me whether the funding agreed to support the additional police resources required by the project had been dedicated to the police rather than as part of the 'Contingency Fund'

**Additional Comments on other aspects of ISC 12.**

**Agenda Item 2 ii to v.** Although I did not contribute to the rest of Item 2, I followed the discussion with interest. I remain concerned about the insistence of

the applicant on the phrase 'reasonable endeavours' notwithstanding the concerns of both SCC and ESC that this would be adequate to ensure compliance. Given the wider issues of ownership and governance, properly effective measures need to be available to the local authorities to hold the applicant to account for the undertakings it is making in order to secure the DCO. There were frequent references to amounts of funds that would be made available as mitigation for various impacts. The nature of these funds remains unclear to me, as does how and when they are released, and the decision making process allocate resources to need. The issue remains opaque. This is of considerable concern because local communities have had no input into how that mechanism for compensation and mitigation would work, despite repeated requests to ESC. The suspicion, having listened to this and other hearings, is that this essential detail is being kept deliberately vague by the Applicant with the passive consent of ESC.

I was interested to note the claim from Mr Humphries for the Applicant that the Tourism Fund, set for £12m, was more than 5 times that for the equivalent fund at Hinckley Point C. This is the first tangible recognition I have seen that EDF recognises that the site for Sizewell C is different from Hinckley Point C. That does not, of course, translate to an understanding of the wider environment that will be affected, nor remove the controversy over the assessment and whether the impact can, in fact, be mitigated effectively.

### **Agenda Item 3: Potential Adverse Effects on Human Health.**

**Night Time Rail.** Yoxford will not be directly affected by rail noise but, as in other areas, it is concerning to note that so many issues remain outstanding on an issue (the rail led strategy) that is crucial to delivering the planned project and will have, whatever the Applicant suggests, a profound effect on the lives of those who live along the railway line.

**Noise Assessment and Mitigation.** The vagueness of much of the discussion on this issue was noticeable and concerning. In particular the uncertainty over baseline experience, the methods of assessing impacts and the absence of a recognisable enforcement process with 'teeth' is a serious source of concern. Will SCC and ESC have the capability to monitor impact and hold the Applicant to account? The intransigence of the Applicant on this issue is disturbing.

**Air Quality.** There remains local concern about air quality and I was concerned to note that, ESC are 'content' with the situation. In this context I would ask the Inspectorate to consider the article from the Times of Thursday 23 September 21

explaining the impact for the UK of the World Health Organisation's tightening its guidelines (article attached). The issue of air quality in this project needs to be re-examined.

#### **Agenda Item 4 : Effects on Public Rights of Way**

**B1122 in the Early Years.** Although Yoxford is at the western end of the B1122, and has its own issues of split communities which are being addressed with the Applicant assisted by SCC, we support strongly the concerns and position of the parishes of Middleton, Theberton and Kelsale. The lack of effective engagement by the applicant with these communities throughout the 6 year, 5 stage consultation process, and until the last minute in the DCO examination, does not reflect well on the applicant. The fact that the current plans are 'embrionic' and 'not in any detail' at this stage of the investigation is alarming and, as I think is recognised by the Inspectorate, is the consequence of another desperate change of direction by the Applicant to appear to address the consequences of trying to 'shoe horn' this massive project into an area that is too small and structurally unsuitable to accommodate it. In the discussion of the merits of timing, and putting mitigation in place *before* inflicting the damage that the SLR is designed to mitigate, the Applicant once again fell back on the alleged urgency of the project. Consideration might be given to the argument that, with so many 'loose ends' to the applicant's plan, it might be a better option to pause, sort out the problems, and give the project a better chance of succeeding than rushing headlong into further problems, cost and delay, none of which would be in the National interest.

**Agenda Item 5: Cumulative Impacts on Health and Well Being.** While the evidence from Dr Barony for the applicant was interesting and encouraging, it should be considered with caution. His evidence is based on the application of the experience from Hinckley, which is embedded in a very different community with a different physical and social infrastructure.

John Sutherell  
Councillor, Yoxford Parish Council  
24 Sept 21