

4th March 2020

The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol BS1 6PN



Dear Sir

Re: Sizewell C new nuclear power station

I am writing on behalf of Yoxford Parish Council.

During the pre-application process for the above, we have become increasingly concerned about the lack of coherent detail provided by EDF Energy, the developer. This has made it extremely difficult for us to judge whether the conclusions they come to regarding impacts and possible mitigations are correct or otherwise, as insufficient evidence has been supplied during four public consultations. We have asked for more detailed information on a number of occasions and pointed out our concerns in our responses to the four consultations, but little has been forthcoming.

Bearing in mind the extreme sensitivity of the proposed site at Sizewell, its proximity to RSPB Minsmere with its European and International designated habitats, and the fact that at least 9 ha of Sizewell Marshes Site of Special Scientific Interest would be lost, and the importance of the area on tourism and local industry plus the lack of adequate roads it is crucial that we have the information necessary to make informed responses to the consultations. Sadly, this has not been the case.

It is our understanding that National Infrastructure Projects should be 'front-loaded' during pre-application, so that problems can be identified and appropriate avoidance/mitigation/compensation strategies can be identified and agreed at an early stage and the Examination can therefore be held within the prescribed time frame. Indeed, this is clearly stated in the advice from the Department of Communities and Local Government: 'Planning Act 2008: Guidance on the Pre-application Process':

The front-loaded emphasis of consultation in the major infrastructure planning regime is designed to ensure a more transparent and efficient examination process. (6.)

This document also refers to section 50 (3) of the Planning Act 2008, which makes clear that applicants 'must have regard to any guidance under this section' (i.e. pre-application procedure).

Baseline information material and surveys are referred to in the Preliminary Environmental Information documents, but these have not been made available during the consultations despite several requests and we are told that these will only be made available at publication and acceptance of the Development Consent Order (DCO). We cannot therefore say that the pre-application procedure has been transparent – quite the contrary. During the four stages of consultation, EDF

NNB have insisted that: 'We only have to provide preliminary environmental information.' This shows that EDF NNB has not properly understood that in order to make informed responses to their consultations, we need to be given sufficient detail. Responses from statutory consultees including Suffolk County Council, East Suffolk Council and Environment Agency amongst others have all made similar representations throughout the four-stage consultation period.

Under paragraph 19 of the above guidance document, in reference to the pre-application consultation process, it states:

A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues.

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 in-

formation 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:

The assumptions about where workers will be travelling from and when and in what numbers.

The assumptions about HGV and non-HGV journeys made by the supply chain in supporting the construction.

A comparison between the assumptions used in traffic modelling for Hinkley Point C and the actual results now construction is underway.

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. Actual vehicle occupancy rates at HPC and a justification why the same rates ought not be used in Sizewell C traffic modelling.

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.

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.

The rationale for the 15% - 85% north / south split for the origins of HGVs

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.

EDF NNB's lack of transparency and willingness to provide adequate detail to us as consultees, has prevented us from making an informed response to the consultations. As a result, we believe that this application has not reached an appropriate stage for examination of the DCO.

As indicated above, we are not alone with this view. Most of the consultation responses that we have seen have emphasised the lack of necessary detail and the difficulty therefore of making properly informed assessments of the proposals. Without sight of crucial surveys, well in advance of DCO submission, we cannot say that EDF has engaged with us effectively. Yet the official guidance states under paragraph 15:

Effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State.

Our conclusion, therefore, is that EDF NNB's consultations have been inadequate. We note that under point 19 of the official guidance, it is stated:

Without adequate consultation, the subsequent application will not be accepted when it is submitted.

We feel that it is important that we raise these concerns now so that you are aware of them.

Yours faithfully,

