### The Accent Report

#### Background

The Councils continue to support the development of nuclear power stations in principle and support the Sizewell C proposal on the basis that EDF Energy should provide a lasting legacy for the economy and the local communities, act as an environmental exemplar, and make appropriate provision for transport and the funding of wider community benefits. There are however significant obstacles that need to be overcome, none more challenging than the management of construction traffic.

We have been working jointly and effectively to address issues along EDF Energy's proposed construction traffic route, paying equal attention to the A12 and the B1122.

In our most <u>recent newsletter</u> we explained the progress that has been made with Government and others in respect of Suffolk's Energy Gateway (SEGway), a scheme that would not only support the construction of Sizewell C but provide wider opportunities for economic growth in East Suffolk. This double motivation means that SCC, rather than EDF Energy, is taking forward the SEGway scheme which in supporting future growth, very much aligns with current government policy.

There is less growth potential towards the coastline in the vicinity of Sizewell, which is characterised by its natural beauty and smaller scale settlements. As such providing increased road capacity to support wider economic growth in that area is not currently being contemplated. Consequently, delivering any improvements for access to Sizewell are driven by the need to mitigate the impacts of Sizewell C construction traffic, which makes this the responsibility of EDF Energy.

In 2015, SCC commissioned AECOM to look at the feasibility of alternative routes to the Sizewell site, including direct access from the A12 (then known as the "D2" route, but better described as the Sizewell Access Road) and local bypasses of Middleton Moor and Theberton. We provided this report to EDF Energy, asking them to fully examine these opportunities.

We remain concerned about the sustained impacts that would arise from routeing construction traffic from the south through Yoxford and along the B1122 over an extended period and current lack of satisfactory mitigation proposals from EDF Energy. Equally there will be ongoing impacts associated with Sizewell C's 60 year operational lifespan, in particular outage events, adding to those traffic flows already experienced from Sizewell B and the decommissioning of Sizewell A.

Consequently in late 2015, SCC commissioned Accent, a leading market research agency, to undertake a piece of research to allow us to understand better the extent, scale and type of concerns that local residents have about EDF Energy's current proposals for Sizewell C. Importantly, we wanted to engage directly with a large number of people in the local area through a phased approach in a piece of work to complement the earlier AECOM work; i.e. to look at the impact of doing nothing for comparison purposes.

The final report is published today and we wish to express our thanks to all those who gave up their time to participate in the study.

Alongside the main report is a summary report and also a copy of the presentation given by Accent to the Joint Local Authorities Group and Parish Councils. This represents the full set of information and evidence collected by Accent.

As is documented in the Literature Review undertaken as part of the study, formal approaches to transport appraisal in the UK do not usually integrate input from affected communities. Nor do they fully reflect or give appropriate weight to the complete range of traffic-related impacts anticipated to arise from the development of major projects, when big developments take place.

As such we wished to provide a medium through which those views could be conveyed to EDF Energy through a structured and rigorous approach using accepted academic methods. We will use this information to push EDF Energy for proportionate mitigation measures taking account not only of the trends emerging from the data, but equally recognising the concerns of those which may be less widespread, but are nevertheless important.

# SCC and SCDC response to the Accent Report

# Engagement

- The majority of the local community are very satisfied living here, but their outlook in respect of the impacts of the construction traffic is one of great dissatisfaction. EDF Energy should make efforts to reassure and inform the community of its intentions in this regard as a matter of urgency. These concerns are manifesting themselves already and causing real impacts on people's wellbeing.
- 2. There are a number of people in the locality who experienced the construction of Sizewell B and therefore have knowledge and evidence of its impacts and how they were addressed (or not) that can be used to help reduce the impacts of Sizewell C and EDF Energy should actively seek to engage with those individuals.
- 3. There remains scope to increase engagement with parishioners. A significant number of the community has not engaged in the consultation process to date. EDF should consider what more it can do to engage with the wider community along the route of the B1122 to capture the full range of views of people on the project.
- 4. The findings of this research are consistent with the broader literature on impacts associated with (construction) traffic. As such they should not be a surprise and need to be properly considered by EDF Energy in developing its proposals.

### Assessment methodology

- 5. The 'traditional' approaches to transport assessment do not sufficiently capture the full range of traffic-related impacts that are likely to arise and their likely consequences, for example the isolation of communities and individuals and EDF Energy should respond to these deficiencies through its own assessments.
- 6. It should be recognised that the B1122 is a relatively lightly trafficked road, being a 'B' road, and it is the significant *change* in traffic volume and composition that gives rise to the extent of concerns; a focus on absolute numbers or reference to levels more suitable for urban environments will not sufficiently represent the deterioration in environmental conditions.
- It is widely believed that the volumes of traffic associated with the construction of Sizewell B were significantly underestimated. EDF Energy should ensure that its transport projections for Sizewell C (currently far higher than those experienced for Sizewell B) are robust, realistic and the effects of such movements are properly assessed.

### Mitigation

- 8. While there is support for Sizewell C, construction traffic is the number one concern for the local community as a whole and EDF Energy needs to devote significant attention to providing a satisfactory solution to delivering its materials to site in such a way that minimises the volume of traffic on the road network.
- 9. There remains significant scepticism locally that the impacts of routeing traffic along the B1122 can be adequately addressed, and thus a strong appetite for a new Sizewell Access Road. EDF Energy should explain its position in relation to this and other feasible relief roads (as described in the AECOM report) and provide a compelling justification to support that position.

- 10. EDF Energy should recognise the cumulative impacts that may manifest themselves on particular communities. For example Theberton is proposed to be significantly affected by construction-related traffic *and* EDF Energy's preferred campus proposals and associated onsite parking and EDF will need to provide mitigation/compensation commensurate with the scale of the effects.
- 11. Different impacts affect different sectors of the community in different ways and mitigation measures should recognise the different types of people that will be affected, be it the elderly, the vulnerable or children.
- 12. EDF should ensure that mitigation measures do not create their own problems, by, for example, urbanising rural environments through hard engineering or introducing light pollution.
- 13. EDF Energy needs to look at the extent of its impacts down to the level of the individual properties in some cases, for example in relation to; the safety of access to those properties accessed directly off the B1122, the impacts of noise and vibration and the impacts on specific heritage assets, such as listed buildings.
- 14. EDF needs to set out a rigorous process of monitoring and enforcement to show that the impacts will not exceed those assessed and that those mitigation measures can be effectively enforced.
- 15. People have significant concerns about the impacts of the construction traffic on their own and their family's health and wellbeing which may be attributable to, for example, personal safety, air quality, stress, reduced walking and cycling, increasing community isolation and severance and a diminution in community spirit. EDF Energy needs to consider carefully how such effects can be resolved by ensuring that measures to mitigate personal and community wellbeing are provided.
- 16. Traffic noise is a major issue for communities, the number one concern associated with the construction traffic. EDF Energy needs to identify a suite of measures to deal with this issue and pay particular attention to how the timing of vehicle movements can reduce the nuisance to local people by avoiding sensitive times of the day (especially at night) and week (especially at weekends). Communities would like to see a reprieve from traffic at these times.
- 17. The measures proposed to reduce the impacts of construction traffic presented at Stage 1 of the consultation do not reflect the priorities of the local community. Specifically there is a strong desire in the community to reduce the level of onsite parking and increase provision at park and ride sites. EDF Energy needs to review its onsite parking proposals, both in respect of the main site car park and that proposed in association with the proposed campus car park.
- 18. Communities wish to see routeing restrictions placed on light as well as heavy good vehicles. The community told us that their view is that EDF Energy needs to review its approach to the control of light goods vehicles and other traffic to reduce the effects of rat-running.
- 19. Speeding is a major concern of local communities, particularly associated with its implied risk to public safety. EDF Energy needs to provide an enforceable means of efficiently controlling speeds of construction-related traffic and as part of a suite of measures to preserve the safety of individuals.

Suffolk County Council and Suffolk Coastal District Council consider that the Accent report provides an insight in to the deep seated and justifiable concerns of local communities and want to see EDF Energy to take these findings on board in revising its proposals in advance of a Stage 2 consultation on the project.