

"Had I the heavens' embroidered cloths  
Enwrought with golden and silver light,  
The Blue and the dim and the dark cloths  
Of night and light and the half light,  
I would spread the cloths under your feet;  
But I being poor, have only my dreams;  
I have spread my dreams under your feet;  
Tread softly because you tread on my dreams"

WB Yeats (1830-1894)

## Introduction

### About Kelsale cum Carlton

Kelsale cum Carlton [KcC] is one of the largest (by area) Parishes in the Suffolk Coastal area and comprises a combined Parish of two village entities (Kelsale and Carlton), three historic Greens (Curlew, North and East) and is bisected by the A12, with the bulk of residents living to the east of it.

The Parish also has the northern tail of the historic A12 route, providing many Saxmundham residents and businesses direct access to and from the A12 at Dorley's Corner, a small community directly alongside the A12.

The KcC Parish comprises nearly 500 households, 32 listed buildings (Graded 1\*, 2\* & 2), a small light industrial estate, a number of places of worship, a listed Village Hall, a Social Club, Public House, several large farms, a number of smaller farms and agricultural businesses dependent on tourism, all located in a substantial agricultural land area surrounding the village centres.

It is home to; the Fromus Nature Reserve (to the west of the A12), three roadside nature reserves (at Tiggins Lane, Fordley Road and Carlton Green - west of the A12), a private nature reserve (Rydall Mount, Tiggins Lane), several flora species of 'national interest', a wide range of domestic and migratory birds, a migratory Red Deer population and a multiplicity of Great Crested Newt colonies. KcC also has two County Wildlife Citations with a third sitting on its boundary.

The Parish has a considerable historic inheritance including; several medieval moated areas, an Ancient Woodland, a richness of archaeological interest and of course the contentious view held by some that, East Green may have been; the site of, adjacent to or on the road toward Sitomagus, all of which have yet to be substantiated.

More recently, in 2018 Kelsale Village became the latest Conservation Area to be designated in the Suffolk Coastal area, in recognition of both its built environment with buildings from 'Nationally Important' architects and its special setting in an open and unspoilt agricultural landscape.

KcC also benefits from a non-designated heritage asset in the form of the historic Carlton Parkland that sits astride the old A12 and adjacent to Clayhills Road at its northern margin.

KcC's neighbouring parishes comprise; Theberton to the east, Middleton and Yoxford to the north, Saxmundham to the south, Rendham to the west, along with other close neighbours; Knodishall, Leiston and Sternfield across predominantly agricultural fields.

In general terms the network of roads and lanes servicing KcC residents and businesses (excepting the A12 and Main Road) are less than 4 metres wide, with many effectively operating as single carriageway lanes. Those where two way 'mixed traffic' is possible (along part or all of their length) are very limited and largely have either complicating factors (i.e. Kelsale Primary School, weak or weight limited bridges, etc.) or facilitative features (i.e. passing spaces).

It should be noted that the network of lanes comprising the greater KcC area are regularly used by; horseriders, runners, walkers, dog walkers, cyclists, game shoots and agricultural vehicle – small and large, they are often hedged to both sides (some sunk), are largely unpaved, have soft verges and deep run-off gulleys and are often subject to field run-off in wet weather.

KcC is centrally placed in an area identified as having 'severe' water issues. As a consequence KcCPC is concerned that the additional water required to construct Sizewell C may irrevocably damage the local aquifers, water abstraction sites and local supply continuity.

### About Kelsale cum Carlton Parish Council's Response

Kelsale cum Carlton Parish Council [KcCPC] has taken the opportunity to review the proposals contained within the four volumes of the Stage 3 Pre-Application Consultation produced by EDF Energy.

Volume 1 – Development Proposals (418 pages)

Volume 2a – Preliminary Environmental Information (374 pages)

Volume 2b – Preliminary Environmental Information (314 pages)

Volume 3 – Preliminary Environmental Information Figures (167 pages)

KcCPC has tried to frame responses to all of the elements of the proposal where they have either a direct impact on the residents of the Parish, or indirect and/or unforeseen consequences of a specific proposal that may impact the Parish detrimentally or beneficially.

Within the limited time available, KcCPC has tried to solicit the views of as many of residents as possible through a Public Meeting, a door-to-door delivered quantitative and qualitative questionnaire alongside face-to-face dialogue.

Where KcCPC (and/or the Parishes' residents) are not adequately equipped with; expertise, knowledge, tools, adequate time or an understanding of a specific topic, KcCPC defer to the expressed views of fellow Parish Councils, Town Councils, expert bodies and/or impacted residents and businesses.

Where a paragraph is 'noted', KcCPC have reviewed the content and concluded it does not require comment.

Readers should note that - KcCPC reserve the right to alter its position in regard to the views expressed in this response, if as a consequence of; ongoing work, the emergence of material elsewhere or other matters of significance howsoever arising, inform KcCPC's position at the time of writing, more fully.

In order to ease navigation of a complex response to EDF Energy's documents, numbering remains the same, with PEI paragraphs prefixed by 'PEI'.

Text in black is that of EDF or in a limited number of cases, a third party, whilst Kelsale cum Carlton Parish Council's [KcCPC] responses are made in blue.

Kelsale cum Carlton Parish Council has undertaken this response and all of its consultation with residents on the basis that government policy has given approval for EDF Energy to consult on the construction of Sizewell C with a view to EDF Energy making an application for a Development Consent Order. Consequently, comments largely relate to the 'how' delivery will be made and not the underpinning rationale for Sizewell C or Nuclear Power.

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**1. Introduction** (Volume 1, Pages 2 to 11)

**1.1 Introduction**

**1.1.1** KcCPC note the Joint Venture between EDF Energy and China General Nuclear Power Corporation through NNB Generation Company (SZC) Limited (Reg. No. 09284825), incorporated in London on 28<sup>th</sup> October 2014.

KcCPC also note that further shareholder investment is being sought to finance and construct Sizewell C, with unnamed UK Pension Funds currently in discussions.

It is noted that NNB Generation Company (SZC) Limited is referred to as **EDF Energy** throughout the consultation documentation.

**1.1.2** Noted

**1.1.3** KcCPC note the intent not to undertake any further consultation prior to deciding whether to take forward proposals in the form of an application for a Development Consent Order.

KcCPC regret that this appears to be the intention of EDF Energy, as it believes that some of the proposals coming forward in this Stage 3 Consultation, are radically different to those in the preceding Stages (1 and 2) and are in some instances either in part or fully; unsubstantiated, incomplete, ill defined, unproven or unsound.

Consequently, KcCPC believes it likely that some proposals directly impacting Parish residents may only be seen in substantive form at the point an application for a Development Consent Order is made to the Planning Inspectorate, leaving Representations to the Planning Inspectorate as the only forum for raising concerns.

**1.1.4** KcCPC note the restatement of the EDF Energy vision (from Stage 2).

However, in light of proposals coming forward in Stage 3 (and noting the respect shown for the marine environment), KcCPC wonder under what definition of "sustainability" the development, operation and decommissioning of Sizewell C is being undertaken under.

Can it possibly be:

*"A process of change in which the exploitation of resources, the direction of investments, the orientation of technological development and institutional change are all in harmony and enhance both current and future potential to meet human needs and aspirations"*

**The World Commission on Environment and Development**

**1.1.5** KcCPC notes the contents of this paragraph and in particular:

*"...we have continued to collect environmental information to identify any significant environmental effects that may arise in connection with the project. In doing so, we have started to consider how these effects may be addressed...and changes to our transport and socio-economic strategies."*

KcCPC expect any application for a Development Consent Order to reflect this paragraph, but also a broader consideration of environmental effects, with "significant" also being applied to those within the local social context, and not just Public Right of Ways as it seems to be.

**1.1.6** The contents of this paragraph are noted.

KcCPC also note that consideration of the origin and transport of construction materials is absent, prior to marshalling at the Freight Management Facility. This omission, in the context of residents journeying beyond the immediacy of the East Suffolk coastal area, seems to imply that - wider disruption on the A12 South of Ipswich and the A14 West of Ipswich is not being planned for within the project.

## **1.2 Key updates and changes since the stage 2 consultation**

### **a) Main development site**

1.2.1 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

### **b) Transport strategy for movement of construction materials**

1.2.2 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.3 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

### **c) Changes to park and ride facilities**

1.2.4 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

### **d) Community and economic issues**

1.2.5 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.6 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

1.2.7 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

### **e) Additional assessment of impact of construction workforce**

1.2.8 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

### **f) Movement of people**

1.2.9 The contents of this paragraph are noted by KcCPC and will be addressed within the respective section(s) of the Consultation documentation.

## **1.3 Policy context update**

1.3.1 The contents of this paragraph are noted.

1.3.2 The contents of this paragraph are noted.

1.3.3 The contents of this paragraph are noted.

1.3.4 The contents of this paragraph are noted

1.3.5 The contents of this paragraph are noted

1.3.6 The contents of this paragraph are noted

1.3.7 The contents of this paragraph are noted

#### 1.4 Structure of this document

- 1.4.1 The contents of this paragraph are noted.
- 1.4.2 The contents of this paragraph are noted.
- 1.4.3 The contents of this paragraph are noted.
- 1.4.4 The contents of this paragraph and Table 1.1 are noted.

#### 1.5 Approach to consultation

- 1.5.1 The contents of this paragraph are noted.

KcCPC also note that “...we have committed to undertaking a minimum of three formal stages of pre-application consultation prior to submitting our application for development consent...” and in regard to comments made previously at 1.1.3, look forward to EDF Energy **reflecting on the improvement to public interest** served by an additional consultation, prior to making application for a Development Consent Order.

- 1.5.2 The contents of this paragraph are noted.
- 1.5.3 The contents of this paragraph are noted.
- 1.5.4 The contents of this paragraph are noted.
- 1.5.5 The contents of this paragraph are noted.
- 1.5.6 The contents of this paragraph are noted.
- 1.5.7 The contents of this paragraph are noted.

#### 1.6 Approach to acquisition of land

- 1.6.1 The contents of this paragraph are noted.

KcCPC note that:

“...However, in the event that negotiations with some land owners are unsuccessful, EDF Energy would propose to acquire land via compulsory purchase, and will seek the necessary powers in the application for development consent.”

KcCPC look forward to EDF Energy publishing transparent, control processes that ensure the integrity, equitability and consideration that will be extended to landowners in all instances of the exercise of these privileged powers.

#### 1.7 Responding to this consultation

##### a) Finding out more

- 1.7.1 KcCPC represents a broad range of residents, many of whom have; mobility issues, restricted access to the very limited public transport options, no access and/or understanding of the internet, restricted visitors or a support network.

As a consequence, KcCPC sought access to printed Consultation materials, to enable some of these villagers' access to the consultation documents at Kelsale Village Hall, thereby reducing the number of Parish residents precluded from participating in the consultation.

KcCPC would like EDF Energy and the Planning Inspectorate to note that this request was initially refused and it was only through the persistence of the Parish Councillor with the Sizewell C portfolio responsibility, that EDF Energy did eventually capitulate, making two sets of documentation available.

KcCPC believes their experience is a salutary lesson to anybody undertaking public consultations, particularly in localities where access to transport, technology and personal support networks are limited.

1.7.2 The contents of this paragraph are noted.

1.7.3 KcCPC is gravely disappointed that despite proposals coming forward in the Stage 3 Consultation, directly impacting a significant group of Kelsale cum Carlton residents and indirectly many more – EDF energy failed to schedule a “public exhibition” in Kelsale cum Carlton, unlike many other directly impacted Parishes.

Moreover, rather than naming Kelsale cum Carlton as a directly impacted Parish, the EDF Stage 3 documentation largely refers to the impacted area as “...South of Yoxford...”.

Given the preceding comments (1.7.1 above), KcCPC would like to point out to both EDF Energy and the Planning Inspectorate that KcCPC believes these instances are indicative of broader issues relating to; a lack of local knowledge and are also symptomatic of the undue haste with which some of these proposals have been brought forward.

1.7.4 The contents of this paragraph are noted.

See the preceding comments (1.7.1 and 1.7.3 above)

**b) Responding to this consultation**

1.7.5 The contents of this paragraph are noted.

See the preceding comments (1.7.1, 1.7.3 & 1.7.4 above)

## **2. Project Overview** (Volume 1, Pages 12 to 36)

### **2.1 Introduction**

**2.1.1** KcCPC note the content of the paragraph (including Figure 2.1) and defer to third parties with the requisite knowledge and expertise to critique the technical assertions made within.

**2.1.2** KcCPC note the content of the paragraph

**2.1.3** KcCPC note the content of the paragraph

**2.1.4** KcCPC note the content of the paragraph

KcCPC is disappointed that the marine-led strategy has been assessed as being weak, but at the same time is heartened that in referencing "...its impact on the marine environment and related potential to impact the project's construction programme and operational date.", EDF Energy appear willing to consider the primary drivers of the project in the round, especially when assessing the viability of a specific option.

In this case, emphasising the qualitative (environmental impact) and temporal aspects, rather than focusing (or placing undue weight) on the fiscal driver.

**2.1.5** KcCPC note the two transport strategies being consulted on in Stage 3

**2.1.6** KcCPC note the assertions made in the paragraph and will address each as they arise

**2.1.7** KcCPC is disappointed that after a significant period of explorative work EDF Energy "...do not yet know with certainty that the rail-led strategy is deliverable, particularly within the timescale necessary to serve the project."

Moreover, KcCPC is surprised at the modest ambition of the outline rail-led strategy.

KcCPC note that EDF Energy "...are working with Network Rail to confirm the deliverability of the various improvements to rail infrastructure that would be necessary.", but are very disappointed at an implied "once and done" consultation approach, on such a critical option is outlined in the sentence "We wish at this stage also to receive feedback from this consultation on the implications of a rail-led strategy so that we can make a fully informed decision on which strategy to take forward into the application for development consent."

**2.1.8** Whilst KcCPC notes and welcome EDF Energy testing the potential impact of an increased workforce on the main development site, KcCPC is shocked that EDF Energy felt it necessary to test a rise in excess of 40% above the "central estimate".

That said, recently reported step increases in workforce numbers at Hinkley Point C would seem to point to a systemic understating of base case estimates.

All of the impacts including those identified at 2.1.8, will be addressed as they arise.

**2.1.9** KcCPC note the content of the paragraph and Figure 2.2

### **2.2 Main Development Site**

**2.2.1** KcCPC note the content of the paragraph and Figures 2.3, 2.4 & 2.5

**2.2.2** KcCPC note the content of the paragraph

**2.2.3** KcCPC note the content of the paragraph



### 2.3 Green Rail Route

- 1.7.6 KcCPC note the content of the paragraph and Figures 2.6 & 2.7
- 2.3.2 KcCPC note the content of the paragraph
- 2.3.3 KcCPC seek clarification on the role of rail transport post removal of the Green Rail Route and Land Reinstatement, specifically relating to the removal of hazardous waste (Sizewell A if required, B and C), serving outages (Sizewell B and C), etc.
- 2.3.4 KcCPC note the intention to remove the Green Rail Route and reinstate the farmland, etc. after construction completion.
- 2.3.6 KcCPC note the content of the paragraph

### 2.4 Other rail improvements and changes to level crossings

- 2.4.1 KcCPC note the content of the paragraph

#### a) Sizewell Halt or new rail siding

- 2.4.2 KcCPC note the intention of EDF Energy to commence delivery of construction materials to the main development site prior to completion of the Green Rail Route or the Sizewell Link (dependent on the chosen strategy).
- KcCPC is concerned about the duration, intensity and pattern of construction material deliveries (and return journeys) to the main development site ahead of completion of the strategic infrastructure elements of either strategy. KcCPC seeks further details from EDF Energy.
- KcCPC is further concerned about the absence of substantive underpinning controls and processes during what is likely to be a 'make do and mend' arrangement. KcCPC seeks further details from EDF Energy.
- 2.4.3 KcCPC note the intention of EDF Energy to deliver freight from Sizewell Halt to the main development site by HGV vehicles along Lovers Lane.
- KcCPC is concerned at the potential volume and intensity of transfers along Lovers Lane, the loss of local amenity and the impact on those living at Sizewell Beach and thereabouts. KcCPC seeks further details from EDF Energy.
- 2.4.4 KcCPC note the intention of EDF Energy to deliver freight arriving at a new rail siding, adjacent to the existing branch line, to the main development site by HGV vehicles along Lovers Lane.
- KcCPC is concerned at the potential volume and intensity of transfers along Lovers Lane, the loss of local amenity and the impact on those living at Sizewell Beach and thereabouts. KcCPC seeks further details from EDF Energy.
- 2.4.5 KcCPC note the requirement for the Green Rail Route, as neither Sizewell Halt or a new siding would be capable of peak period operating under a rail-led strategy.
- KcCPC is concerned at the seemingly low level of ambition being attributed to a Rail-led strategy (i.e. Figure 2.2 "Up to 5 trains per day"). Whilst there may be very good reasons, these constraints are not immediately visible and it is unclear whether a full range of options have been tested rigorously enough (i.e. night trains, etc.). KcCPC seeks further details from EDF Energy.
- 2.4.6 KcCPC seek clarification on the role of rail transport post removal of the Overhead Conveyor or removal of the new siding (whichever is selected) specifically relating to the removal of hazardous waste (Sizewell A if required, B and C), serving outages (Sizewell B and C), etc. under normal operation, outages and maintenance.

**b) Upgrades to the East Suffolk line and changes to level crossings**

2.4.7 KcCPC note the content of the paragraph.

2.4.8 KcCPC note the content of the paragraph.  
KcCPC is concerned at the seemingly low level of rail ambition being described under a Road-led strategy (ie. Figure 2.2 "Up to 2 trains per day"). Whilst there may be very good reasons, these constraints are not immediately visible and it is unclear whether a full range of options have been tested rigorously enough (i.e. night trains, etc.). KcCPC seeks further details from EDF Energy.

2.4.9 KcCPC note the content of the paragraph.

**c) Saxmundham-Leiston branch line and changes to level crossings**

2.4.10 KcCPC note the content of the paragraph.

**2.5 Sizewell link road**

2.5.1 KcCPC note the content of the paragraph and Figure 2.10

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.5.2 KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

2.5.3 KcCPC is concerned that EDF Energy envision the Sizewell Link remaining after the completion of the power station, as a "...lasting legacy..." of the project.

Perhaps EDF Energy should consult with the local Parish Councils and communities (as well as the statutory authorities) prior to determining whether retention is the preferred outcome.

Not to do so, might mean that what ostensibly is intended as a gesture of largesse, might be otherwise construed as a manifestation of; the projected and ongoing operational and decommissioning needs of EDF Energy, a requirement agreed between EDF Energy and the responsible local authority(ies), cost avoidance of reinstatement, or a combination of all of the foregoing and other considerations.

2.5.4 KcCPC note the content of the paragraph

## 2.6 Theberton bypass

### 2.6.1 KcCPC note the content of the paragraph and Figure 2.11

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

### 2.6.2 KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

### 2.6.3 KcCPC is concerned that EDF Energy envision the Sizewell Link remaining after the completion of the power station, as a "...lasting legacy..." of the project.

Perhaps EDF Energy should consult with the local Parish Councils and communities (as well as the statutory authorities) prior to determining whether retention is the preferred outcome.

Not to do so, might mean that what ostensibly is intended as a gesture of largesse, might be otherwise construed as a manifestation of; the projected and ongoing operational and decommissioning needs of EDF Energy, a requirement agreed between EDF Energy and the responsible local authority(ies), cost avoidance of reinstatement, or a combination of all of the foregoing and other considerations.

### 2.6.4 KcCPC note the content of the paragraph

## 2.7 Two Village bypass

### 2.7.1 KcCPC note the content of the paragraph and Figure 2.12

KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact of traffic linked with;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

**2.7.2** KcCPC is gravely concerned about the impacts of a road-led strategy as a whole, particularly the cumulative impact on air quality, landscape, flora, fauna and agriculture of;

- the Sizewell C construction programme
- a number of SSE wind farm associated schemes
- two potential European link cable schemes (Belgium & Holland)
- construction traffic associated with over 10,000 additional homes
- increased commuting traffic movements south on the A12, resulting from the new housing
- increased traffic resulting from East Suffolk's 'year-round tourist' destination strategy

KcCPC will develop these and other themes further throughout the response, as appropriate.

**2.7.3** KcCPC note the content of the paragraph

**2.7.4** As various bypass options have been; campaigned for, consulted on and been the subject of extensive community discussion, KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

However, KcCPC note the loss of landscape, habitats and potentially severely detrimental impacts on some residential properties, flora and fauna.

Additionally, KcCPC note that the proposal injects two further deceleration/acceleration nodes into the planned route for 85% of road freight (under a road-led strategy), potentially reducing air quality further.

**2.7.5** KcCPC note the content of the paragraph

## **2.8 Park and ride facilities**

**2.8.1** KcCPC note the content of the paragraph and Figure 2.12

**2.8.2** KcCPC is concerned to note the increase in the number of vehicle parking spaces required at each Park & Ride location and wonder whether this reflects the increased likelihood of peak workforce numbers escalating, as is the case at Hinkley Point C.

KcCPC restate their previous assertion that EDF Energy should take a far more responsible approach to mitigating excessive vehicular movements toward the Suffolk Coastal area and the consequential impacts on communities throughout Suffolk, South Norfolk, East Cambridgeshire and North Essex.

In particular, EDF Energy should consider all traffic reduction measures, including:

- rigorously promoting and rewarding car sharing, aimed at achieving a construction phase average of 3 adults per vehicle 'at the gate'. Ideas include free Park & Ride parking for 3+ (or 75% occupation whichever is the greater), charging for all other vehicles.
- Reduction of Main Site Car Parking, with no access for vehicles with less than 3 adults (or 75% occupation).
- fitting employee and contractor vehicles with 'GPS transponder' technology to enable proactive route monitoring and policing, thereby reducing 'rat run' impacts and maverick behaviours (i.e. fly parking).

**2.8.3** KcCPC welcome the early publication of EDF Energy's 'Park and Ride Restoration Plan' and understanding the extent of groundworks to be undertaken to ensure that both sites meet all necessary remediation standards (after their extended use as parking) to return the land to full agricultural use (i.e. spills, seepage, pollution and construction materials recovery, etc.).

**a) Northern park and ride site**

2.8.4 KcCPC note the content of the paragraph and Figure 2.13

KcCPC note that the proposal injects a further deceleration/acceleration node into the planned route for 15% of road freight (under a road-led strategy), potentially reducing localised air quality further.

2.8.5 KcCPC note the content of the paragraph

**b) Southern park and ride site**

2.8.4 KcCPC note the content of the paragraph and Figure 2.14

As various Southern Park and Ride options have been; consulted on and the subject of extensive community discussions, KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the revised EDF Energy approach.

**2.9 Freight Management Facility**

2.9.1 KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

2.9.2 KcCPC welcome the early publication of EDF Energy's 'Freight Management Facility Restoration Plan' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as an HGV parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

2.9.3 KcCPC note the content of the paragraph

**a) Option 1: A12/A14 Seven Hills site**

2.9.4 KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

Consequently, KcCPC is interested to understand the degree to which waiting times at all J58 entrances are forecast to increase as a consequence of EDF Energy construction HGV's approaching and departing the Freight Management Facility.

Access to the Freight Management Facility is assumed to be by:

- exiting the A14 from the west
- entering the circulating flow
- circulating the roundabout to the A1156 exit at the South
- entering Felixstowe Road to the left
- entering the Freight Management Facility to the left

Departure to the Sizewell C site is assumed to be by:

- exiting the Freight Management Facility turning right across the traffic flow
- entering the A1156 turning right across the traffic flow
- entering the roundabout traffic flow
- circulating the roundabout to the A12 exit at the North

KcCPC also note that access and egress via the Felixstowe Road and A1156 requires HGV traffic to pass and repass the entrance to the Seven Hills Crematorium.

As a consequence, KcCPC would seek reassurance from EDF Energy that (inbound and outbound) HGV drivers will be instructed to show due respect to the departed (and those attending) by easing access and egress for vehicles to/from the Seven Hills Crematorium.

KcCPC anticipate that; HGV deceleration into the roundabout, HGV queueing time, HGV circulation round the roundabout and HGV acceleration away up the A12 may have a significant and detrimental impact on air quality in and around the J58 area.

Any contradictory evidence from EDF Energy modelling of the impact would be welcomed and should be placed in the public domain, along with the modelling assumptions.

#### **b) Option 2: Innocence Farm site**

##### **2.9.5**

KcCPC note the content of the paragraph and Figure 2.15

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, KcCPC note the proposals would seem to dramatically increase HGV traffic on the A14 where it is known to be over or near to capacity (Junctions 53 to 58) in both peaks (Source SCDC Local Plan evidence base).

Moreover, the junction (A14 J58) is acknowledged as having high Volume to Capacity in both peaks (Northward and Westward) as well as having reached near capacity in circulating flow (Source SCDC Local Plan evidence base).

Consequently, KcCPC is interested to understand the degree to which waiting times at impacted J58 entrances are forecast to increase as a consequence of EDF Energy construction HGV's departing the Freight Management Centre and proceeding west to access the A12 at J58.

Access to the Freight Management Facility is assumed to be by:

- exiting the A14 from the west
- entering Croft Lane/Innocence Lane
- entering the Freight Management Facility to the right crossing the traffic flow

Departure to the Sizewell C site is assumed to be by:

- exiting the Freight Management Facility turning left
- entering the A14 Eastbound
- proceeding approximately 1.6 miles to the Kirton Road roundabout
- entering the roundabout traffic flow
- circulating the roundabout to the A14 westbound exit
- proceeding on the A14 westbound to J58
- sliproad to J58 roundabout
- entering the roundabout traffic flow
- circulating the roundabout to the A12 exit at the North

KcCPC anticipate that collectively the HGV decelerate/accelerate behaviours and waiting times arising from these inbound and outbound patterns may have a significant and detrimental impact on air quality in and around the J58 area and East through to the Kirton roundabout.

Any contradictory evidence from EDF Energy modelling of the impact would be welcomed and should be placed in the public domain, along with the modelling assumptions.

## **2.10 Yoxford roundabout**

**2.10.1** KcCPC note the content of the paragraph and Figure 2.16

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy proposal.

However, as an adjacent Parish, KcCPC remind EDF Energy and the Planning Inspectorate of the comments made at 2.5.1 and 2.5.2 (above), that will be developed along with other themes, further throughout the response, as appropriate.

**2.10.2** KcCPC note the content of the paragraph

## **2.11 Highway improvements, cycling and rights of way**

**2.11.1** KcCPC is surprised at the superficiality of the identified works planned "...to mitigate the impact of Sizewell C traffic." irrespective of which strategy is advanced to the Planning Inspectorate.

KcCPC will develop and broaden its views throughout this response but are concerned that observed behaviours on the A12 and the surrounding road network, combined with behaviours evident in and round Hinkley Point C give rise to a wide range of easily predictable as well as less predictable consequences of the EDF Energy proposals.

**2.11.2** KcCPC note the content of the paragraph

**2.11.3** KcCPC note the content of the paragraph

**3. Planning Context (Volume 1, Pages 37 to 43)**

**3.1 Introduction**

3.1.1 KcCPC note the content of the paragraph

**3.2 Planning Regime**

3.2.1 KcCPC note the content of the paragraph

3.2.2 KcCPC note the content of the paragraph

**3.3 Need for new nuclear development and Sizewell C**

3.3.1 KcCPC note the content of the paragraph

3.3.2 KcCPC note the content of the paragraph

KcCPC specifically note the reference to NPS EN-1, developments in technology since publication and the continuing growth in low impact, low carbon, generating capabilities in UK, Europe and Worldwide.

3.3.3 KcCPC note the content of the paragraph

KcCPC specifically note the reference to a statement made in 2017 by Rt Hon Greg Clark MP and Secretary of State for Business, Energy and Industrial Strategy, as an exemplar of "Members of Parliament have confirmed the Government's ongoing commitment to new nuclear."

KcCPC is also cognisant of recent changes in the; geopolitical climate, the fortunes of economies worldwide, the uncertainties created by Britain's vote to exit the European Union, the changing financial fortunes of major World and European generators since publication of NPS EN-1 and more recently.

3.3.4 KcCPC note the content of the paragraph

KcCPC specifically note the reference to NPS EN-6, the recent events in Anglesey, Gloucestershire & Cumbria, along with the alleged cause(s).

3.3.5 KcCPC note the content of the paragraph

Additionally, KcCPC note the recent comment of Duncan Hawthorne (Chief Executive of Hitachi's Horizon) when referring to Anglesey, he said "the best site for nuclear development in the UK".

3.3.6 KcCPC note the content of the paragraph

KcCPC note the reference to "The annex also identifies that the development of Sizewell C would not be expected to take place without some significant impacts. However, the assessment recognises the potential acceptability of those impacts in view of the national need for nuclear power generation and the scarcity of alternative sites."

In respect to the last sentence, KcCPC also note recent events in Anglesey, Gloucestershire & Cumbria.

3.3.7 KcCPC note the content of the paragraph

3.3.8 KcCPC note the content of the paragraph

KcCPC note references to Annex C and are cognisant of its content, published in 2011.

3.3.9 KcCPC note the content of the paragraph



**3.3.10** KcCPC note the content of the paragraph

KcCPC also note that within Annex C "This assessment has outlined that there are a number of areas which will require further consideration by the applicant, the IPC and/or the regulators should an application for development consent come forward..."

and that "The strategic level assessment undertaken by the Government did not include detailed traffic assessments as this will depend on a number of factors which aren't yet known such as the timing and phasing of development. Section 5.13 of EN-1 contains policy on consideration of traffic and transport impacts which would be undertaken should an application for development consent come forward."

**3.3.11** KcCPC note the content of the paragraph

**3.3.12** KcCPC note the content of the paragraph

**3.3.13** KcCPC note the content of the paragraph

**3.4 Planning Regime**

**3.4.1** KcCPC note the content of the paragraph

KcCPC note with interest the assertion that "Sizewell B was granted planning permission in 1987, following a public inquiry, with the support of the Suffolk County Council and a recognition that an application for Sizewell C would follow."

**3.4.2** KcCPC note the content of the paragraph

KcCPC note a somewhat liberal, albeit factually correct interpretation of the word 'current' within "The site's identification in current national policy reconfirms the historic recognition of Sizewell as a suitable location for nuclear power generation."

**3.5 National Policy Statements**

**3.5.1** KcCPC note the content of the paragraph

**3.5.2** KcCPC note the content of the paragraph

**3.5.3** KcCPC note the content of the paragraph

**3.5.4** KcCPC note the content of the paragraph

**3.5.5** KcCPC note the content of the paragraph

KcCPC draw notice to NPS EN-1 whereby "The decision maker should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or lead to air quality breaches of any national air quality limits. In all cases, the decision maker must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed."

and "The decision maker should not grant development consent unless it is satisfied that the proposals will meet the following aims:

- avoid significant adverse impacts on health and quality of life from noise;

and

- mitigate and minimise other adverse impacts on health and quality of life from noise;

and

– where possible, contribute to improvements to health and quality of life through the effective management and control of noise.

Moreover, “A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the decision maker should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Detrimental impacts on the surrounding transport infrastructure should be managed and mitigated during all stages of the development. Demand management measures must be considered, including other modes of transport such as water-borne or rail transport. Controls must be put in place for Heavy Goods Vehicle (HGV) movements, ensuring arrangements are in place for any abnormal disruption.”

“Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the decision maker should consider requirements to mitigate adverse impacts on transport networks arising from the development...”

3.5.6 KcCPC note the content of the paragraph

3.5.7 KcCPC note the content of the paragraph

### 3.6 Other planning policy considerations

3.6.1 KcCPC note the content of the paragraph

3.6.2 KcCPC note the content of the paragraph

#### a) National Planning Policy Framework

3.6.3 KcCPC note the content of the paragraph

3.6.4 KcCPC note the content of the paragraph

3.6.5 KcCPC note the content of the paragraph

KcCPC is puzzled by the inclusion of a paragraph that asserts that “The project would deliver substantial benefits that the NPPF identifies as being important to the achievement of sustainable development.” when in a prior paragraph EDF Energy point out that “Neither the NPPF nor local planning policy is specifically identified as a matter to be taken into account...”

#### b) Local Planning Policy

3.6.6 KcCPC note the content of the paragraph

3.6.7 KcCPC note the content of the paragraph

3.6.8 KcCPC note the content of the paragraph

3.6.9 KcCPC note the content of the paragraph

3.6.10 KcCPC note the content of the paragraph

### 3.7 Implications of planning policy

3.7.1 KcCPC note the content of the paragraph

3.7.2 KcCPC note the content of the paragraph

3.7.3 KcCPC note the content of the paragraph

KcCPC note with interest that EDF Energy assert that "...Balancing the environmental sensitivities and local effects with the need for the development of a NSIP calls for a thoughtful approach to the design and implementation of the project, informed by a full understanding of the environmental qualities of the area."

3.7.4 KcCPC note the content of the paragraph

3.7.5 KcCPC note the content of the paragraph

**4. Socio-Economics** (Volume 1, Pages 44 to 84)

**4.1 Introduction**

4.1.1 KcCPC note the content of the paragraph

4.1.2 KcCPC note the content of the paragraph

4.1.3 KcCPC note the content of the paragraph

4.1.4 KcCPC note the content of the paragraph

4.1.5 KcCPC note the content of the paragraph

4.1.6 KcCPC note the content of the paragraph

4.1.7 KcCPC note the content of the paragraph

4.1.8 KcCPC note the content of the paragraph

4.1.9 KcCPC note the content of the paragraph

**a) Setting the policy context for Sizewell C**

4.1.10 KcCPC note the content of the paragraph

4.1.11 KcCPC note the content of the paragraph

4.1.12 KcCPC note the content of the paragraph

KcCPC note the requirement for the socio-economic effects of the project to be assessed, and note that the "effects on tourism", "social cohesion" and "cumulative effects" are included.

**b) Defining the socio-economic parameters and assumptions**

4.1.13 KcCPC note the content of the paragraph

4.1.14 KcCPC note the content of the paragraph

KcCPC specifically note that the "workforce profile", "workforce characteristics" and "Workforce accommodation assumptions and spatial distribution" are used in assessing the socio-economic impact of the project.

KcCPC is concerned that the breadth of the socio-economic assessment, particularly in respect to "Workforce characteristics" appears to be largely based on numeric modelling (i.e. demographic, economic and housing choice/preference), with seemingly little weight given to behavioural, attitudinal and cultural characteristics of a large, mobile workforce.

KcCPC believes that the potential socio-economic impacts of a large mobile workforce on; "community cohesion" and "tourism" goes far deeper than a numeric modelling approach.

KcCPC would have expected an experienced utiliser of large mobile workforces, like EDF Energy, to appreciate this and have developed a more sophisticated modelling environment.

4.1.15 KcCPC note the content of the paragraph

4.1.16 KcCPC note the content of the paragraph

4.1.17 KcCPC note the content of the paragraph

4.1.18 KcCPC note the content of the paragraph

4.1.19 KcCPC note the content of the paragraph and Figure 4.1

See comments at 4.1.14 above

4.1.20 KcCPC note the content of the paragraph

## **4.2 Socio-economic project assumptions**

### **a) Overarching principles**

4.2.1 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to “avoid, mitigate or manage significant adverse...social impacts that would directly arise from the construction...”

See comments at 4.1.14 above

4.2.2 KcCPC note the content of the paragraph

KcCPC note the intent to “...to impose and enforce a Code of Conduct on the Sizewell C workforce...”.

With a significant portion of the workforce anticipated to ‘self-commute’ to either the; Northern Park and Ride, Southern Park and Ride or direct to the Main Construction Site, can EDF Energy outline the requirements that will be placed on these members of the workforce as they travel to and from Sizewell C and how these will be enforced?

KcCPC is aware that issues such as ‘fly parking’, ‘rat running’, poor driving behaviours, indiscriminately discarded waste, etc. have the potential to impact large swathes of Suffolk, Essex, Norfolk and Cambridgeshire, impacting not only residents but also visitors and tourists.

### **b) Workforce profile and local recruitment**

4.2.3 KcCPC note the content of the paragraph

4.2.4 KcCPC note the content of the paragraph

4.2.5 KcCPC note the content of the paragraph

4.2.6 KcCPC note the content of the paragraph and Figures 4.2 & 4.3

KcCPC note and regret that the intent seems to be the maintenance of a high proportion of non-home-based workers for the bulk of the Construction Phase.

KcCPC anticipates this EDF Energy workforce strategy will further exacerbate A12 traffic issues arising from the high dependency on HGV movements (irrespective of the transport strategy selected).

KcCPC note that the revised EDF Energy targets for Car Sharing still lack ambition and fall far short of those achievable where; environmental, neighbour relations, ‘considerate contractor’ and ethical policies are embraced.

KcCPC also foresee that as a direct result of this strategy; tourism will be detrimentally impacted, conditions in the minor road networks will deteriorate quickly and dramatically, noise, air quality and resident amenity will all be impacted and the environmental impact will be far broader than the immediate area surrounding the Main Development Site.

4.2.7 KcCPC note the content of the paragraph and Table 4.1

4.2.8 KcCPC note the content of the paragraph

KcCPC note and welcome the creation of 500 jobs that seemingly will be serviced by home-based workers.

However, it regrets the implication that these are regarded as low skill, and by inference low paid opportunities, thereby "...limiting the extent to which they would need to draw on skills from outside the area."

4.2.9 KcCPC note the content of the paragraph

KcCPC note and welcome the creation of 500 jobs that seemingly will be serviced by home-based workers.

However, it regrets the implication that **security, catering, administration, etc.** are regarded as low skill, and by inference low paid, thereby "...limiting the extent to which they would need to draw on skills from outside the area."

4.2.10 KcCPC note the content of the paragraph

KcCPC is concerned that amid the confidence about recruiting people with relevant skills, no reference is made to a significant housebuilding programme in Suffolk, and particularly East Suffolk. As most of this programme occurs within the same timeframe as the EDF Energy development, the potential impacts on either/or both to attract the requisite skills in sufficient enough numbers from a reasonable radius, at a reasonable cost seem quite significant.

Likewise, KcCPC is concerned at the potential denuding of locally scarce resources in trades for small building works and building maintenance (i.e. carpenters, plumbers, electricians, etc.), resulting in a shortage of valuable services to all Suffolk residents and particularly a potentially disproportionate impact on the elderly and vulnerable.

4.2.11 KcCPC note the content of the paragraph

Please refer to the general comments at 4.2.10 (above)

4.2.12 KcCPC note the content of the paragraph

KcCPC note that East Suffolk and surrounding District Council areas do have significant 'retired' populations, some of whom have considerable experience in project/programme management, Health & Safety, Environmental and professional disciplines.

KcCPC suggests that EGF Energy look specifically at this opportunity and examining options for 'assignment' type employment to leverage local skills further.

4.2.13 KcCPC note the content of the paragraph

4.2.14 KcCPC note the content of the paragraph and Figure 4.3

KcCPC note the assertion that "...the approximate 2,000 plus 500 'home-based' workers represent the peak of construction. For this short period the demand for highly specialised M&E roles is also at its peak.". In this connection, KcCPC wonder what EDF Energy believes constitutes a "short period", as from the figures it is not clear?

4.2.15 KcCPC note the content of the paragraph and Table 4.2

4.2.16 KcCPC note the content of the paragraph

KcCPC note that this paragraph makes no mention of the traffic or environmental impacts "...if the NHB workforce were to be larger...".

4.2.17 KcCPC note the content of the paragraph

KcCPC is very concerned to note that "...we have considered throughout this chapter what the effects might be of a peak workforce of 7,900 in order to ensure that our strategies and assessments are robust and to consider whether any additional mitigation would be necessary."

KcCPC note and welcome EDF Energy testing the potential impact of an increased workforce on the main development site. However, KcCPC is shocked that EDF Energy felt it necessary to test a rise in excess of 40% above the "central estimate".

That said, recently reported step increases in workforce numbers at Hinkley Point C would seem to point to a systemic understating of base case estimates!

4.2.18 KcCPC note the content of the paragraph

**c) UK construction workforce characteristics**

4.2.19 KcCPC note the content of the paragraph

4.2.20 KcCPC note the content of the paragraph

KcCPC is concerned that the breadth of the socio-economic assessment, particularly in respect to "Workforce characteristics" appears to be largely based on numeric modelling (i.e. demographic, economic and housing choice/preference), with seemingly little weight given to behavioural, attitudinal and cultural characteristics of a large, mobile workforce.

KcCPC believes that the potential socio-economic impacts of a large mobile workforce on; "community cohesion" and "tourism" goes far deeper than a numeric modelling approach.

KcCPC would have expected an experienced utiliser of large mobile workforces, like EDF Energy, to appreciate this and have developed a more sophisticated modelling environment.

4.2.21 KcCPC note the content of the paragraph

Please refer to comments at 4.2.20 (above)

KcCPC note that "Building a profile of the construction workforce...enables us to work with the community and local authorities who provide public services to prepare for any potential service demand from specific groups, and ensure that barriers to integration of workers and the community are limited."

KcCPC note the inference that it is for (solely) the communities, local authorities and public service providers "...to prepare...ensure that barriers...are limited".

KcCPC wonder what integration steps are planned by EDF Energy with the workforce (i.e. directly employed, contacted, sub-contracted, casual etc.) prior to their arrival at the workplace, thereby providing some symmetry in commitment and delivery.

For example, if as seems likely and proper the workforce is diverse, will EDF Energy be funding a translation service enabling; the workforce to effectively access services and the services to effectively communicate with members of the workforce.

4.2.22 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.23 KcCPC note the content of the paragraph

4.2.24 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.25 KcCPC note the content of the paragraph

Please refer to comments at 4.2.21 (above)

4.2.26 KcCPC note the content of the paragraph

4.2.27 KcCPC note the content of the paragraph

**d) Workforce accommodation choices**

4.2.28 KcCPC note the content of the paragraph

4.2.29 KcCPC note the content of the paragraph

4.2.30 KcCPC note the content of the paragraph

KcCPC believes that the immediate Parishes and adjoining neighbours to the proposed campus and caravan arrangements should be best placed to make informed comment.

However, as a close-by Parish, KcCPC would look to EDF Energy to take determined action to ensure that residents of the campus and caravan site do not engage in 'fly parking', 'rat running', poor driving behaviours, indiscriminately discarding waste, etc. when travelling to and from their accommodation.

4.2.31 KcCPC note the content of the paragraph

4.2.32 KcCPC note the content of the paragraph

KcCPC understand that currently Houses of Multiple Occupation [HMO's] are relatively rare in the immediate area. As a consequence, and in order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter across all types of residential properties.

4.2.33 KcCPC note the content of the paragraph

In order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter/tenant across all types of residential properties.

4.2.34 KcCPC note the content of the paragraph

4.2.35 KcCPC note the content of the paragraph

4.2.36 KcCPC note the content of the paragraph

In order to safeguard members of the workforce, KcCPC looks to EDF Energy to make the workforce aware of their rights (and responsibilities) as a private renter/tenant across all types of residential properties including all classes of 'latent accommodation'.

**e) Workforce distribution (via a "Gravity Model")**

4.2.37 KcCPC note the content of the paragraph



4.2.38 KcCPC note the content of the paragraph

4.2.39 KcCPC note the content of the paragraph

4.2.40 KcCPC note the content of the paragraph

4.2.41 KcCPC note the content of the paragraph

KcCPC note that “The Gravity Model results have been used to inform the traffic modelling detailed in Chapter 6 of this volume and the wider transport strategy in Chapter 5 of this volume, as well as the assessment of socio-economic effects.” but is disappointed that an easily digestible graphic representation has not accompanied the consultation.

In this respect, KcCPC note that throughout the consultation documentation EDF Energy seemingly resist putting data into a digestible format. Even where data is easily visualised, the omission of a graduated measure (i.e. at ‘time line’ x axis on Figures 4.2 and 4.3) makes interpretation less than clear and in the worst case potentially ambiguous.

So, whilst the use of a ‘90-minute commute’ model is potentially a good base assertion, it is difficult to visualise what this means in reality. For example, where are the likely commute centres, what routes provide the ‘90 minute’ criteria, what are the real routing options, what are the predicted traffic flows, what is the current observed behaviours, where does each commute ‘land’ in the high traffic routes, etc.

KcCPC look to EDF Energy to put much more of the HBW modelling into the public domain, in a digestible form, prior to an application being made for a Development Consent order.

4.2.42 KcCPC note the content of the paragraph

Please refer to comments at 4.2.41 (above)

4.2.43 KcCPC note the content of the paragraph

Please refer to comments at 4.2.41 (above)

4.2.44 KcCPC note the content of the paragraph

KcCPC note the assertion “The scale of the construction workforce, and the number of NHB workers who would be likely to seek accommodation in the local area, needs to be seen in the context of the wider residential population. The NHB workforce would be a relatively small number in the context of the existing population of Suffolk (0.8% of approximately 432,500 working age residents) and of the nearest districts of Suffolk Coastal and Waveney (around 2.7%).

However, the residential development laid out in the Suffolk Coastal District Council’s Draft Local Plan recognises that residential accommodation in the area is already beyond the reach of many residents, their families and dependents. As a consequence, greater emphasis is being placed on affordable housing developments.

Consequently, the localised influx of another potentially inflationary impact on housing, over and above second home ownership, tourist accommodation and private rental is potentially damaging to the aspirations of local residents and the SCDC Local Plans’ intent.

4.2.45 KcCPC note the content of the paragraph

Please refer to comments at 4.2.44 (above)

### 4.3 Construction Workforce Accommodation Strategy

#### a) Introduction

4.3.1 KcCPC note the content of the paragraph

4.3.2 KcCPC note the content of the paragraph

4.3.3 KcCPC note the content of the paragraph

4.3.4 KcCPC note the content of the paragraph

#### b) Stage 2 consultation

4.3.5 KcCPC note the content of the paragraph and Table 4.3

Please refer to comments at 4.2.44 (above)

#### c) The private rented sector - Potential effects on the PRS and housing need and vulnerability

4.3.6 KcCPC note the content of the paragraph

KcCPC note with grave concern that "...NHB workers are expected to seek property in the PRS within 60-minutes of the main development site at the peak of construction." as the impact on rental properties in the immediate area (i.e. Kelsale cum Carlton, Saxmundham, etc.) would invariably move more opportunities out of the reach of local people.

Please also refer to comments at 4.2.44 (above)

4.3.7 KcCPC note the content of the paragraph

KcCPC note with grave concern that "information from contractors at Hinkley Point C, the majority of construction workers tend to share accommodation where possible (an average rate of 1.9 workers per home)" as the impact on rental properties in the immediate area (i.e. Kelsale cum Carlton, Saxmundham, etc.) would invariably move more opportunities out of the reach of local people, particularly the young. This may exacerbate the loss of young people to more urban areas.

Please refer to comments at 4.2.44 (above)

4.3.8 KcCPC confirm their agreement with the conclusion of the paragraph

Specifically, "Workers' accommodation preferences are therefore expected to overlap particularly with local residents within the lower quartile of market rents, within smaller (1-2 bed) properties..."

Please refer to comments at 4.2.44, 4.3.6 & 4.3.7 (above)

4.3.9 KcCPC note the content of the paragraph

4.3.10 KcCPC note with grave concern the inference that additional PRS rent inflationary pressures may arise as a consequence of EDG Energy workforce's preferences, sitting as they do, squarely in the same space as local peoples needs, and that Homeless Presentations may rise as a function of this.

4.3.11 KcCPC note the content of the paragraph

KcCPC note that EDF Energy is "...is keen to ensure that demand for PRS accommodation from workers causes as few significant adverse effects on housing need and vulnerability as possible and has been working with SCDC and WDC to identify and scope potential effects and to identify measures to avoid, minimise and mitigate them."

4.3.12 KcCPC note the content of the paragraph

KcCPC note with grave concern that, in the context of the preceding paragraphs and KcCPC's responses to them "...Discussions have focused on Leiston in particular, as the settlement closest to the site and therefore likely to attract the largest number of construction workers looking for accommodation at peak."

KcCPC is concerned that whilst Leiston will potentially be the initial area impacted, the ripples will move at great speed and therefore discussions should be broadened to develop a holistic approach to the Suffolk Coastal area, rather than the implied piecemeal approach. This comment is made in full recognition of the irrational nature of residential markets.

4.3.13 KcCPC note the content of the paragraph

KcCPC note and support the assertion that "Leiston is expected to be where vulnerability is greatest (based on housing register and socio-economic data...particularly for young people (and care-leavers) who may be out of work and without access to housing benefit and who the council will seek to place in private rented accommodation." but believes there are other similar (numerically smaller) issues throughout the urban centres and rural areas throughout the Suffolk Coastal area.

4.3.14 KcCPC note the content of the paragraph

KcCPC note the comment that "...workers likely to seek private rented accommodation in the area (around 360), and in Leiston in particular (around 100). Due to inclusion of an additional 600 bed spaces at the LEEIE caravan site, this number has reduced slightly at this Stage 3 consultation." and is concerned that this reduction would be quickly lost if the workforce numbers rose in line with the stress testing that has been undertaken, or Sizewell C mirrors the recent experience of Hinkley Point C. As a consequence, KcCPC remains unconvinced that any improvement would be sustained.

**Potential effects on tourist accommodation**

4.3.15 KcCPC note the content of the paragraph

KcCPC note with concern the assertion that "the effect of workers coming into the PRS on housing pressure will be mitigated through measures to improve and enhance housing supply". KcCPC is not familiar with this interpretation of the case for the housing supply increase outlined in the SCDC Final Draft Local Plan and would like EDF Energy to make public any evidence they have that demonstrate this is an adopted policy of the local authority.

4.3.16 KcCPC note the content of the paragraph

KcCPC note "EDF Energy is aware that in the summer peak a significant number of tourists visit the Suffolk Coast. The use of tourist accommodation by workers may have adverse economic impacts if tourists are displaced from accommodation. For off-peak times of the year, the use of tourist accommodation by construction workers could have beneficial economic effects, maintaining local spend and employment in these areas.". and is very concerned that EDF appear unfamiliar with the avowed intent (portrayed in the Final Draft Local Plan) of SCDC to develop 'year-round tourism' between 2019 and 2036. Moreover, this strategic plank is portrayed as a major contributor to enduring jobs growth, local prosperity and improvements in the well-being of Suffolk Coastal residents.

KcCPC would like EDF Energy to make public any evidence they have that demonstrate this is an agreed position with the local authority(ies). In the event that evidence is not forthcoming, KcCPC would like EDF Energy to place in the public domain the detailed analysis demonstrating that, compared to the projected growth of tourism in Coastal Suffolk (through to 2036) – "the use of tourist accommodation by construction workers could have beneficial economic effects, maintaining local spend and employment in these areas."

4.3.17 KcCPC note the content of the paragraph

4.3.18 KcCPC note the content of the paragraph

4.3.19 KcCPC note the content of the paragraph

4.3.20 KcCPC note the content of the paragraph

KcCPC note with concern that "Since Stage 2...central case figures have reduced as a result of our Stage 3 proposal to add temporary caravan accommodation in addition to the proposed accommodation campus, and by re-assessing assumptions about worker's likelihood to choose PRS accommodation over tourist sector accommodation (set out in Figure 4.4). This figure may reduce further if workers use latent accommodation."

KcCPC construe this tortuous explanation to signpost a greater worker interest in PRS accommodation than previously forecast, principally as a result of tourist accommodation being more expensive. As a result, KcCPC believes pressure on PRS rents to rise will invariably follow, moving more property out of the grasp of local people who have immediate and growing needs – as identified in the SCDC Final Draft Local Plan.

#### **Latent accommodation**

4.3.21 KcCPC note the content of the paragraph

KcCPC note that "Latent accommodation includes unrated tourist accommodation, rooms for let in private homes, and accommodation new to the market each year. This type of accommodation would offer an opportunity to mitigate negative effects on tourist and PRS capacity, as well as allowing local residents to benefit economically, for example, by renting out spare rooms." and conclude that EDF Energy's remedy to a potential 'housing crisis' of its own making, is to persuade residents and workers to coalesce in the 'bringing forward of' and 'the accepting of' a basket of largely unregulated accommodation solutions.

KcCPC understands that this arrangement may suit many local residents and hopefully (in equal numbers) is also an attractive proposition to members of the workforce.

However, KcCPC also recognises that these forms of arrangements do carry significant potential risks if not undertaken with clear knowledge of the obligations and responsibilities (i.e. legal, insurance, planning, environmental health, consideration for neighbours, etc.).

Consequently, KcCPC would like to understand what support services EDF Energy intend to provide to ensure both potential providers of accommodation and members of the workforce do not inadvertently find themselves in difficult territory.

4.3.22 KcCPC note the content of the paragraph

4.3.23 KcCPC note the content of the paragraph

KcCPC note that "...in Leiston there are approximately 300 under-occupied homes (i.e. with more bedrooms than residents) with 400 spare rooms across all sectors, so this is potentially a rich source of accommodation that would avoid uptake of accommodation in other sectors while making more efficient use of existing stock."

However, KcCPC would suggest that these figures are treated with a high degree of caution as often the 'un-occupied' bedroom is used for other productive purposes (i.e. homeworking, absent children, non-work oriented study, workroom, hobbies, etc.).

It is understood that there is some evidence that a significant number of households previously categorised 'empty nesters' (at or after the 2011 Census) have since reverted to 'refuges' for young adults unable to secure permanent accommodation (i.e. employed graduates, ex-services children, etc.).

#### **d) Accommodation Strategy**

4.3.24 KcCPC note the content of the paragraph

4.3.25 KcCPC note the content of the paragraph

**Accommodation management system**

4.3.26 KcCPC note the content of the paragraph

Please refer to comments at 4.3.21 (above)

KcCPC would like to understand what support services EDF Energy intend to provide to ensure both potential providers of accommodation and members of the workforce do not inadvertently find themselves in difficult territory.

**Temporary worker accommodation (TWA) – campus**

4.3.27 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.28 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.29 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

**Temporary worker accommodation (TWA) – caravans**

4.3.30 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.31 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

4.3.32 KcCPC note the content of the paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

**Identification of additional capacity in the tourist sector**

4.3.33 KcCPC note the content of the paragraph

KcCPC seeks reassurance from EDF Energy and SCDC that any expansion of pre-existing or new sites (outside of those with Consultation 3) will be through the normal Planning Application and Licencing processes and not through the application for a Development Consent Order.

**A housing fund**

4.3.34 to 40 KcCPC note the content of the paragraphs (4.3.34 to 4.3.40) and Table 4.4

KcCPC note the content and intent of Paragraphs (4.3.34 to 4.3.40) and the details in Table 4.4.

KcCPC's position is that it broadly agrees with the purpose of the fund, the scope of it and the strategic intent.

However, KcCPC is not expert in, aware of, or competent to comment on much of the content. Consequently, it agrees that Local Authority expertise should be the pre-eminent source of opinion regarding this initiative.

That said KcCPC is eager to understand (amongst many other facets); the mechanism's to be employed, the conduct and management of the processes and procedures, the accountability for end-to-end integrity, the number of Local Authorities involved and the full measurement set to be published (in the public domain), thereby ensuring transparency and continuity across individual Local Authority boundaries.

KcCPC would also like absolute clarity on what constitutes the so called '60-minute area', as it seems ill defined within Consultation 3 and is subject to interpretation.

It is assumed that until this is fully detailed it is likely to involve; East Suffolk (currently SCDC & Waveney District Councils), Babergh and Mid Suffolk, Ipswich Borough, Forest Heath, St Edmundsbury, some of the South Norfolk District Councils, potentially some of the North Essex District Councils, etc.

Finally, KcCPC wish to understand the audit arrangements (operational as well as financial) that will be put in place to ensure; impact, efficacy and value for money.

#### **Managing impacts in the 7,900-workforce assessment case**

**4.3.41** KcCPC note with grave concern the content of the paragraph

KcCPC specifically notes "...since Stage 2 we have also considered the potential implications if the NHB workforce were to be larger. This enables us to ensure that our strategies are comprehensive and robust, so that should the workforce increase over the 'central case', the project has the flexibility to respond to any effects and to mitigate them."

KcCPC is anxious that "...we have also considered the potential implications if the NHB workforce were to be larger." has in fact become a Trojan Horse aimed at seeking and obtaining consent for a worryingly flexible approach to construction workforce utilisation, up to and over 40% greater than that previously coined as EDF Energy's 'central case'.

This is seen by KcCPC as nothing other than a cynical ploy to overcome some of the consequences of project planning deficiencies recently evidenced at Hinkley Point C.

**4.3.42** KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

**4.3.43** KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

**4.3.44** KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

**4.3.45** KcCPC note with grave concern the content of the paragraph

Please refer to comments at 4.3.41 (above)

**4.3.46** KcCPC note with grave concern the content of the paragraph and Figure 4.4

Please refer to comments at 4.3.41 (above)

### 4.3 Social/community strategy

#### a) Introduction

##### 4.4.1 KcCPC note the content of the paragraph

KcCPC note that whilst there is a richness of structured research in the use (and abuse) of demographic profiling particularly in marketing, there seems far less 'first world' structured research on the changes in the demographic profile of a community bought about by protracted exposure to a radically different one.

However, there does appear to be a body of thought (developed out of the recent experiences of tribes in the Amazon Basin and sub-Saharan Africa) that, the exposure of a community with a shared demographic profile can be altered or fractured by exposure to a radically different one.

Consequently, with a protracted construction phase and a large omnipresent workforce, it is not possible to discount lasting impacts on communities, as well as well those in the short term.

##### 4.4.2 KcCPC note the content of the paragraph

KcCPC understands that the potential impacts of a large workforce, present over a sustained period, may drive attitudinal, behavioural and cultural change in the local populations, and that in turn this may require modification or the re-engineering of service availability and delivery.

##### 4.4.3 KcCPC note the content of the paragraph

KcCPC understands that the potential impacts of a large workforce, present over a sustained period, may lead to real and perceived changes in community cohesion and integration, not all of which will be positive.

#### b) Stage 2 consultation

##### 4.4.4 KcCPC note the content of the paragraph and Table 4.5

##### 4.4.5 KcCPC note the content of the paragraph

KcCPC welcomes the stated intent of undertaking detailed audits of "...existing and future school places, sport and leisure facilities, healthcare, social services and children's services." however it is not clear what area will be covered by the audit. Clarification from EDF Energy on the agreed coverage would be welcomed prior to the audit being commenced and thence prior to an application for a development consent order.

##### 4.4.6 KcCPC note the content of the paragraph

KcCPC welcomes the engagement with SCC and other stakeholders in respect to the potential effects of the construction workforce on the provision of healthcare, social care for adults and young people, the use of local facilities. However, as a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "...settlement close to the site..." for the purpose of having full consideration in these discussions.

##### 4.4.7 KcCPC note the content of the paragraph

KcCPC welcomes the intended audit activity and as a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "...settlement close to the site..." for the purpose of having full consideration in the audit.

##### 4.4.8 KcCPC note the content of the paragraph

##### 4.4.9 KcCPC note the content of the paragraph



KcCPC welcomes the intended collaboration between EDF Energy and other service providers to develop ways of mitigating any effects on existing capacity. As a small village, reliant on towns and large villages (primarily Leiston & Saxmundham) for many of these services, Kelsale cum Carlton wish to be regarded as a "...settlement close to the site..." for the purpose of having full consideration in the collaborative work.

4.4.10 KcCPC note the content of the paragraph

KcCPC note the use of "...adequately avoided..." the prefacing of avoidance with 'adequately' implying...that it is expected to be less than optimal?

#### **Schools and childcare**

4.4.11 KcCPC note the content of the paragraph

KcCPC wish to make EDF Energy aware that as host to a respected and performing school - Kelsale CEVC Primary School, it is currently operating close to capacity, a fact that SCC and SCDC are well aware of.

Nevertheless, potential funding for an additional classroom has recently been removed and a development of 43 dwellings in the immediate area has been approved, many of which are family homes.

KcCPC is profoundly concerned that with potential relief only coming with the development of a new provision at the planned Saxmundham Garden development, without action this issue will become critical in the next year, maybe two.

KcCPC is also aware of a locality shortage of capacity in 'Early Years' provision, another area where the Saxmundham Garden development is planned to offer some relief.

4.4.12 KcCPC note the content of the paragraph

4.4.13 KcCPC note the content of the paragraph

4.4.14 KcCPC note the content of the paragraph

See comments at 4.4.11 (above)

4.4.15 KcCPC note the content of the paragraph

See comments at 4.4.11 (above)

#### **Social services (adult and children's services and safeguarding)**

4.4.16 KcCPC note the content of the paragraph

4.4.17 KcCPC note the content of the paragraph

See comments at 4.4.1, 4.4.2 & 4.4.3 (above)

KcCPC whilst recognising the proposed workforce testing environment, are concerned that the Sizewell C development could potentially become a focus for the attentions of so called 'County Lines' operators.

KcCPC would hope that a Suffolk Constabulary led initiative, are leading work with the local authorities and EDF Energy to develop appropriate strategies for the mitigation of the potential issue, not only in the immediate area but throughout the surrounding towns and villages.

4.4.18 KcCPC note the content of the paragraph

4.4.19 KcCPC note the content of the paragraph



#### **Healthcare facilities**

4.4.20 KcCPC note the content of the paragraph

4.4.21 KcCPC note the content of the paragraph

4.4.22 KcCPC note the content of the paragraph

4.4.23 KcCPC note the content of the paragraph

4.4.24 KcCPC note the content of the paragraph

KcCPC is very interested to understand what steps are planned to mitigate the impacts of all the traffic movements directly and indirectly related to the development of Sizewell C.

However, KcCPC believes that it is not only an issue for Ambulance, but also Police, Fire & Rescue and Coastguard Services in responding to emergency calls.

Of particular concern are the; local road network, single carriageway sections of the A12 and rural locations throughout the Suffolk Coastal area.

In respect to the Ambulance Service KcCPC believes it is fundamental that any designed mitigations, also permit unfettered access south and/or north and/or West to take patients to the appropriately equipped hospital, after initial treatment by the ambulance crew.

#### **Emergency services and emergency preparedness**

4.4.25 KcCPC note the content of the paragraph

See comments at 4.4.24 (above)

4.4.26 KcCPC note the content of the paragraph

4.4.27 KcCPC note the content of the paragraph

4.4.28 KcCPC note the content of the paragraph

4.4.29 KcCPC note the content of the paragraph

Whilst KcCPC understands the underpinning rationale that drives "...approach for monitoring and mitigation of effects based on the level of NHB workforce (excluding those paying council tax) and number of incidents;" it is difficult to see how management of a two-tier arrangement could possibly be robust and have sufficient enough integrity without carrying an enormous overhead (for both EDF Energy and the service providers).

EDF Energy must place in the public domain a full cost/benefit analysis of any proposed process prior to its agreement and inception. Alternatively, a workforce 'per capita' model could be adopted, without the implied complexity and overhead!

4.4.30 KcCPC note the content of the paragraph

KcCPC notes that Sizewell B is a live environment and therefore is keen to understand whether the Sizewell B emergency arrangements are readily 'scalable' (as implied in this paragraph) to encompass the entire construction process of Sizewell C through to receipt of the first nuclear fuel on site?

Presumably this has been independently and verified?

If not, KcCPC respectfully suggest that this should be a pre-requirement prior to any application to the Planning Inspectorate.

### **Sports and recreation**

4.4.31 to 44 KcCPC note the content of these paragraphs

KcCPC note that these paragraphs deal with the more 'structured environment' sport and recreation facilities, but do not mention other sport and recreational pursuits where high numbers of participants may impact the local environment and residents in the Suffolk Coastal area (e.g. road cycling, road running, off-road running, orienteering, walking, horse riding, BMX, etc.).

However, taking into account the outline workforce profile, it is also possible that other more intrusive pastimes could radically impact the environment and the amenity enjoyed by existing residents (e.g. drone flying & racing, other model aircraft flying and racing, recreational motor cycling, off-roading, so called 'green laning', jet-skiing, power boating, quad biking, motocross etc.).

Can EDF Energy confirm that consideration has been given to these issues and the concomitant impacts. If so can EDF Energy also put in the public domain what avoidance measures and/or mitigations have been developed?

If not KcCPC believes that full consideration of sports and recreational impacts must be given prior to an application being made for a Development Order.

### **Community cohesion/integration**

4.4.45 KcCPC note the content of this paragraph

4.4.46 KcCPC note the content of this paragraph

See comments at 4.4.1, 4.4.2, 4.4.3 & 4.4.17 (above)

4.4.47 KcCPC note the content of this paragraph

4.4.48 KcCPC note the content of this paragraph and Table 4.6

### **Health and wellbeing**

4.4.49 KcCPC note the content of this paragraph

4.4.50 KcCPC note the content of this paragraph

4.4.51 KcCPC note the content of this paragraph

4.4.52 KcCPC note the content of this paragraph and Table 4.7

4.4.53 KcCPC note the content of this paragraph

KcCPC note that for pragmatic purposes "...the HIA will be completed towards the end of the pre-application period (post Stage 3)." but want reassurance that the final HIA will be agreed with the key stakeholders prior to the submission of an application being made?

4.4.54 KcCPC note the content of this paragraph

4.4.55 KcCPC note the content of this paragraph

### **Local, in-combination effects – Community Impact Reports**

4.4.56 KcCPC note the content of this paragraph

4.4.57 KcCPC note the content of this paragraph

4.4.58 KcCPC note the content of this paragraph

KcCPC is concerned that whilst this paragraph contains "...This will include but not be limited to Leiston, Theberton and Eastbridge.", it is not satisfactory to omit Parishes where there is a potential and/or specific impact (i.e. Kelsale cum Carlton - the link road proposal, 85% of HGV traffic passing through the Parish and the arising noise, pollution, dust and air quality issues within yards of Parish residents).

Therefore, KcCPC insist that a Community Impact Report should be made for each community adjacent to the A12 from the FMF in the South to to the Sizewell C site (where requested by the Parish Council) and from the North & West where appropriate (and where requested by the Parish Council).

4.4.59 KcCPC note the content of this paragraph

KcCPC note and welcome the proposal that a Community Fund be established as part of the Section 106 agreement, "to ensure communities could access compensation for general or combined disruption as effects arise."

However, KcCPC believes that considerably more focus should be placed on the avoidance of the effects (immediate and 'whole life') of construction and operation of the Sizewell C site than is evident at present and would not like to think that a Community Fund becomes an alternative to good, diligent research and planning.

KcCPC is very aware that "urgency" in projects and programmes can lead to a disproportionate emphasis on the temporal dimension, often accompanied by the easing of performance limits in the fiscal and qualitative dimensions.

The maxim of "fail to prepare, prepare to fail" may be old, but it still has currency in modern programmes, as evidenced in recent civil engineering programmes that have incurred enormous overspends.

**Community fund**

4.4.60 KcCPC note the content of this paragraph

See comments at 4.4.59 (above)

4.4.61 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

4.4.62 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

4.4.63 KcCPC note the content of this paragraph

See comments at 4.4.58 & 4.4.59 (above)

**Community Safety Management Plan and Worker Code of Conduct**

4.4.64 KcCPC note the content of this paragraph

4.4.65 KcCPC note the content of this paragraph

KcCPC expect the Code of Conduct to be extended to include the primary road routes (A12 & A14) and the surrounding road networks, safeguarding; other road users, pedestrians, cyclists, horse riders, dog walkers and joggers by explicit provisions covering both the workforce and contracted drivers etc.

These provisions should reference (as a minimum); obligations under the law, common courtesy, defensive driving, the correct disposal of waste (including human waste), what to do in the event of a breakdown

(motorcycle, car, LGV, HGV and bus), what to do in the event of emergency services vehicles, 'fly parking', 'rat running' etc.

KcCPC expect a draft Code of Conduct to be published for broad community and statutory body consultation, prior to any application being made for a Development Consent Order.

4.4.66 KcCPC note the content of this paragraph

See notes at 4.4.65 (above) for the required expansion of the behaviours and locations included in the Code of Conduct.

4.4.67 KcCPC note the content of this paragraph

#### **4.5 Economic Strategy**

4.5.1 KcCPC note the content of the paragraph

4.5.2 KcCPC note the content of the paragraph

##### **a) Stage 2 consultation**

4.5.3 KcCPC note the content of the paragraph and Table 4.8

4.5.4 KcCPC note the content of the paragraph

##### **b) Employment in energy and construction**

###### **Scale and characteristics of energy and construction employment**

4.5.5 - 4.5.12 KcCPC note the content of these paragraphs and Figure 4.5

###### **Sizewell C's influence on employment in construction and operation**

4.5.13 - 4.5.14 KcCPC note the content of these paragraphs

###### **The UK's industrial strategy**

4.5.15 - 4.5.16 KcCPC note the content of these paragraphs

###### **Construction skills in the UK and the East of England – existing context for construction and energy sector skills**

4.5.17 - 4.5.19 KcCPC note the content of these paragraphs

###### **Potential in the labour market and the economic cycle**

4.5.20 - 4.5.26 KcCPC note the content of these paragraphs

###### **The potential for workforce displacement**

4.5.27 - 4.5.43 KcCPC note the content of these paragraphs

##### **c) Employment, skills and education strategy**

4.5.44 - 4.5.60 KcCPC note the content of these paragraphs

**A plan for education**

4.5.61 – 4.5.69 KcCPC note the content of these paragraphs

**d) Business and the construction supply chain**

**Project value, investment and local benefits**

4.5.70 - 4.5.78 KcCPC note the content of these paragraphs

**Supply chain engagement strategy**

4.5.79 - 4.5.84 KcCPC note the content of these paragraphs

**Skills and the supply chain**

4.5.85 - 4.5.87 KcCPC note the content of these paragraphs

**e) The tourist economy**

**Scale and characteristics of the tourist economy**

4.5.88 - 4.5.93 KcCPC note the content of these paragraphs and Figure 4.6

**Establishing potential effects on tourism and avoiding them**

4.5.94 KcCPC note the contents of this paragraph

4.5.95 KcCPC note the contents of this paragraph

4.5.96 KcCPC note the contents of this paragraph

4.5.97 KcCPC note the contents of this paragraph

KcCPC note the commencement of Market Research in 2018 and also note there is no methodology described (i.e. impact informed vs control group), no 'early bird' results and no timetable for the production of results.

4.5.98 KcCPC note the contents of this paragraph

KcCPC also note the intention to undertake further research including a quantitative tourism survey, in "...early 2019...", again no details or timetable.

4.5.99 KcCPC note the contents of this paragraph

KcCPC note that the focus of the direct engagement activity appears to be businesses with a compelling 'reason to visit' and/or USP.

However, KcCPC is concerned that many of the jobs and core employment opportunities that lie in Suffolk tourism activity, are in businesses that are not necessarily bestowed with a singular and compelling proposition (i.e. food, drink, retail, services, etc.).

Consequently, there has to be a question mark on whether they are powerful enough to draw tourists from (for example) London and the South East who will look at the North & East Norfolk option, accessed via the M11/A11 corridor versus access to the likes of Aldeburgh, Southwold etc. via an A12 corridor heavy with HGV traffic from the A14/A12 J58.

**4.5.100** KcCPC note the contents of this paragraph

KcCPC note EDF Energy recognise that “Environmental impacts, including disturbance due to traffic, noise, light, visual and air quality effects have the potential to indirectly affect tourism.” KcCPC note that light pollution in the form of a ‘glow dome’ from the EDF Energy site at Hinkley Point C is visible from more than 4 miles away (line of sight) and 8 miles (the most direct road route).

KcCPC also note “These are required by law to be assessed and significant effects avoided or mitigated to a level that is not considered significant.” and “It is noted that the combination of environmental effects may affect amenity in some locations, and this will be assessed through a non-additive cumulative assessment at the local level.”

KcCPC believes that any assessment should be based on an ‘additive cumulative assessment’ insofar as to do otherwise would permit EDF Energy to limit its mitigation of impacts as though it was the only impact felt by the environment/business/individual concerned.

In contrast, the environment/business/individual concerned has no choice, they have to suffer cumulative impacts irrespective!

Thus, KcCPC believes it is incumbent of any civil engineering project to:

**A]** Avoid impacts wherever and howsoever they materialise

Then

**B]** Mitigate impacts where avoidance is unfeasible and/or residual impacts exist

And then

**C]** Compensate where residual impacts persist

**4.5.101** KcCPC note the contents of this paragraph

KcCPC notes the proposed approach, but remains concerned that the focus is still on singular events and/or businesses with a compelling ‘reason to visit’ and/or USP.

KcCPC remains worried that businesses oriented toward ‘passing trade’ and ‘footfall’ will be largely bypassed in this approach and looks to EDF Energy to bring forward more inclusive proposals, prior to any application for a development consent order.

**Visitor centre**

**4.5.102 - 106** KcCPC note the contents of this paragraph

KcCPC believes that the Parish Councils and local communities directly impacted by this proposal are best placed to make detailed comment on the EDF Energy approach.

**4.6 Economic Strategy**

**4.6.1** KcCPC note the content of the paragraph and Table 4.9

KcCPC note that at Table 4.9, traffic is bundled into a wide range of issues having variable potential impacts:

“Potential adverse effects on tourism due to construction disturbance/traffic/potential beneficial effects of workers using tourist accommodation off-peak.”

However, traffic itself has a variety of direct and indirect impacts.

As a consequence, KcCPC want to see traffic (in all of its forms) recognised as a key potential inhibitor of tourist activity in the Suffolk Coastal area.

One only has to think of the impact that traffic has had in creating the almost 'legendary' reputation of the A303, which is hotly contested in 'top trumps' terms by the A3, A30 and the A23!

KcCPC note the "Mitigation/enhancement measures embedded in project" are defined as "Range of measures to improve design, reduce noise, visual and traffic impacts as set out in other chapters." and the "Tourism Fund".

KcCPC believes that the direct and indirect impacts of traffic are being systematically underplayed throughout the consultation with little regard being paid to the compound impact of;

- the SCDC Local Plan housebuilding commitment
- the SCDC Local Plan 'Year-round' tourist ambition
- the Scottish Power Wind Farm Projects (x 4)
- the expansion of the Port of Felixstowe
- the Port of Felixstowe RORO initiative

Moreover, despite the scale of materials required there is little (or no) reference within the consultation in respect to the origin of the HGV movements arriving at the FMF, prior to being sent north up the A12. Should these impact the A12 and/or A14 South and West of Ipswich, the impacts on tourism may be even greater.

#### **4.7 Next Steps**

**4.7.1** KcCPC note the content of the paragraph

**4.7.2** KcCPC note the content of the paragraph

**5. Transport Strategy** (Volume 1, Pages 85 to 107)

**5.1 Introduction**

5.1.1 KcCPC note the content of the paragraph

5.1.2 KcCPC note the content of the paragraph

5.1.3 KcCPC note the content of the paragraph

5.1.4 KcCPC note the content of the paragraph

KcCPC note the following:

"EDF Energy has not identified either the rail-led or road-led strategy as preferred at this stage..."

"...we anticipate that the rail-led strategy is likely to involve greater delivery risk..."

"The rail-led strategy in particular involves significantly greater physical work..."

"...we do not yet know whether the necessary rail improvements required in the rail-led strategy are fully feasible or could be delivered on time."

"...in addition to considering the Stage 3 consultation responses, EDF Energy will need to further assess these risks and any potential implications on programme..."

"...as part of its decision on which strategy to pursue in the application for development consent."

5.1.5 KcCPC note the content of the paragraph

5.1.6 KcCPC note the content of the paragraph

KcCPC note the following:

"marine led strategy...EDF Energy has concluded that this is not feasible due to the impacts on marine ecology..."

"...would not meet the "urgent" need for new nuclear power identified by Government in the National Policy Statement (NPS)..."

"a Beach Landing Facility (BLF) is proposed for both strategies."

"...throughout the construction phase under both strategies and during the operational phase..."

5.1.7 KcCPC note the content of the paragraph

5.1.8 KcCPC note the content of the paragraph

**5.2 Overview of feedback from the Stage 2 consultation**

5.2.1 KcCPC note the content of the paragraph

KcCPC note the following:

"support for the high level transport strategy including the use of park and ride..."

"...and the use of rail and sea to transport freight."



**a] Freight**

5.2.2 KcCPC note the contents of this paragraph

5.2.3 KcCPC note the contents of this paragraph

5.2.4 KcCPC note the contents of this paragraph

5.2.5 KcCPC note the contents of this paragraph

5.2.6 KcCPC note the contents of this paragraph

5.2.7 KcCPC note the contents of this paragraph

5.2.8 KcCPC note the contents of this paragraph

5.2.9 KcCPC note the contents of this paragraph

5.2.10 KcCPC note the contents of this paragraph

5.2.11 KcCPC note the contents of this paragraph

**b] Other consultation responses**

5.2.12 KcCPC note the contents of this paragraph

KcCPC note with regret the following:

"We will publish a transport assessment with our application for development consent that will comprehensively set out the modelling work undertaken."

5.2.13 KcCPC note the contents of this paragraph

KcCPC note with regret the following:

"...enables us to identify the timing of necessary highway improvements. Some schemes would be needed to mitigate the early years impacts, while others would not be needed until peak construction."

5.2.14 KcCPC note the contents of this paragraph

5.2.15 KcCPC note the contents of this paragraph

5.2.16 KcCPC note the contents of this paragraph

KcCPC is appalled that EDF Energy propose to drive a "...wholly new route..." through its Parish at this late stage in the consultation and without the courtesy of identifying it as impacting Kelsale cum Carlton residents or advising the Parish Council of their intent.

KcCPC regard this action to be ill advised, poorly thought through and symptomatic of expedient thinking that has delivered an ill-conceived and unsound road proposal.

KcCPC will develop this theme throughout their response.

5.2.17 KcCPC note the contents of this paragraph

KcCPC note the following:

"...also sets out why EDF Energy is not proposing the four-village bypass in either the rail-led or road-led strategies but is working with SCC to support their aspiration for such a scheme, which is now known as the Suffolk Energy Gateway."

5.2.18 KcCPC note the contents of this paragraph

5.2.19 KcCPC note the contents of this paragraph

5.2.20 KcCPC note the contents of this paragraph

5.2.21 KcCPC note the contents of this paragraph

5.2.22 KcCPC note the contents of this paragraph

5.2.23 KcCPC note the contents of this paragraph

5.2.24 KcCPC note the contents of this paragraph

5.2.25 KcCPC note the contents of this paragraph

5.2.26 KcCPC note the contents of this paragraph

**c] Revised proposals for Stage 3**

5.2.27 KcCPC note the contents of this paragraph

5.2.28 KcCPC note the contents of this paragraph

5.2.29 KcCPC note the contents of this paragraph and Table 5.1

KcCPC is gravely concerned at the amount of fundamental change made in the Transport Strategy since the Stage 2. Rather than a contiguous development through the Consultation phases, EDF Energy's Transport Strategy appears to comprise an ever changing, disconnected assortment of reactive positions, most of which appear; poorly conceived, badly thought through and contrary to the principles of impact avoidance, particularly on key attributes of the Coastal Suffolk area (e.g. the environment, resident amenity and needs, tourism, air quality, etc.).

Specifically, KcCPC note:

- Sizewell Link Road through all phases (construction, operation and into decommissioning) and a 'lasting legacy'
- Freight Management Facility proposals adjacent or close to the A14 J58 that already has a high Volume/Capacity at both peaks with the A12 and circulating flows at near capacity.
- HGV movements over extended hours
- 67% increase in 'typical' daily HGV movements, up to 375 arrivals (750 movements) from 225/450
- 67% increase in 'peak' daily HGV movements, up to 750 arrivals (1,500 movements) from 450/900
- Loss of a high-volume Marine delivery facility on environmental grounds, but retention of a potentially damaging Beach Landing Facility, through all phases (construction, operation and into decommissioning).

5.2.30 KcCPC note the contents of this paragraph

KcCPC note the proposal that assorted highway works (dependent on the selected strategy) would "...start at the beginning of the early years..."

5.2.31 KcCPC note the contents of this paragraph

KcCPC note with considerable concern that starts for both Park and Ride facilities are being delayed by EDF Energy "...to reduce the early years construction impacts...because the early years workforce could be accommodated at the on-site car park.", a facility already criticised as being inordinately large. KcCPC believes that this proposal necessitates unnecessary vehicular movements (and the impacts resulting) were the Park and Ride capabilities on stream early.

KcCPC also note the 'catch all' inclusion of "...other highway improvements could also be started later to reduce construction traffic impacts in the early years...", potentially giving EDF Energy significant flexibility in undertaking disruptive highway improvements, presumably without further consultation or consideration of the direct and indirect impacts on residents, business, tourism and the environment.

### **5.3 Transport strategy for the construction workforce**

#### **a) Overall strategy**

**5.3.1** KcCPC note the content of the paragraph

KcCPC note with considerable concern that "we have considered what the effects of the project might be if the workforce figures were higher. To do this from a transport perspective, we have adopted a higher workforce figure in our transport modelling work. The modelling is based, therefore, on a larger workforce of 7,900 construction workers and 600 associated development operational workers." and although KcCPC agree that stress testing the base assumption is good practice, it is greatly concerned that recent events at Hinkley Point C may mean this is a provision being made by EDF Energy to deal with systemic 'workforce requirement' forecasting issues.

**5.3.2** KcCPC note the contents of this paragraph

**5.3.3** KcCPC note the contents of this paragraph

KcCPC note that EDF Energy make no mention of comments made at Stage 2 regarding the inordinately large car parking provision at the main site and concerns about EDF Energy's commitment to limiting all avoidable traffic movements.

**5.3.4** KcCPC note the contents of this paragraph

**5.3.5** KcCPC note the contents of this paragraph

KcCPC note and welcome the proposed measures to avoid further main site car parking and even more workers travelling direct to the main construction site. However, it regrets that these steps are not developed enough to reduce the Stage 2 main site parking proposal, considered too large by many people.

#### **b) Location of the construction workforce**

**5.3.6** KcCPC note the content of the paragraph

#### **c) Park and ride proposals**

**5.3.7** KcCPC note the content of the paragraph

**5.3.8** KcCPC note the content of the paragraph

KcCPC note the forecast avoidance of construction worker traffic flows (...through the villages of Blythburgh and Westleton... Snape and Tunstall...) achievable by the provision of the Park and Ride. However, KcCPC remain unconvinced that these reductions can be achieved whilst the very large car parking provision at the main site remains.

**5.3.9** KcCPC note the content of the paragraph

5.3.10 KcCPC note the content of the paragraph

5.3.11 KcCPC note the content of the paragraph

5.3.12 KcCPC note the content of the paragraph

KcCPC note "...many construction workers would simply switch to using the Darsham park and ride. This is because there would be a shorter total journey time to the main development site..." and wonder whether this assertion is evidenced or, is based on EDF Energy's understanding of the behaviours of their potential workforce demographic (perhaps by observation at Hinkley Point C?). Assuming it is the latter, is this indicative of a more general pattern of workforce; attitudes, behaviours and culture? Moreover, would this behaviour continue if the workforce were allocated specific Park and Ride routes?

5.3.13 KcCPC note the content of the paragraph

KcCPC note the inferred depth of detail and understanding in this paragraph, particularly in respect to the workforce behaviours were a Woodbridge or Martlesham location for the Southern Park and Ride decided.

Once again KcCPC wonder whether this assertion is evidenced or, is based on EDF Energy's understanding of the behaviours of their potential workforce demographic (perhaps by observation at Hinkley Point C?).

5.3.14 KcCPC note the content of the paragraph

#### **Frequency and routing of park and ride buses**

5.3.15 KcCPC note the content of the paragraph

KcCPC note that;

"...frequent services would operate during staff changeover and shift start/end periods and buses would depart **every ten minutes** to serve the expected **5,600 workforce**"

"...to give a robust assessment, we have modelled a bus departing each park and ride approximately every **six minutes**... sufficient capacity for the **assessment of the 7,900**"

and also, an **undefined**;

"...reduced skeleton service outside the modelled hours (0600-0900 and 1500-1900)."

KcCPC is very disappointed that the Stage 3 Consultation is peppered with ill defined or unquantified assertions that have a direct bearing on the impacts on residents, business, tourism and the environment.

5.3.16 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy (in the event that the Sizewell Link Road is built) to continue the use of the B1122 as a feeder route for (amongst other traffic) buses from the Darsham Park & Ride - "...travel on the A12 and use the new A12/B1122 roundabout...the buses would join the Sizewell link road via a new link west of Middleton Moor..." and wonder what the planned arrangement for minimum flow disruption will be employed?

KcCPC assume that EDF Energy can evidence Darsham Park & Ride buses can comfortably and safely integrated into the stream with Southern Park & Ride buses (already in stream) at **6 minute** intervals, HGV flow rates at up to one **every 32 seconds**, interspersed with irregular car, motorcycle and LGV flows?

KcCPC also note the intention of EDF Energy (in the event that the Sizewell Link is not built) to use the B1122 as the primary routing for all Park and Ride buses up to joining the Theberton bypass.

KcCPC note the Stage 3 Consultation remains silent on the return routing of Park and Ride buses to Darsham and Wickham Market and wonders why this fundamental element is missing?

5.3.17 KcCPC note the content of the paragraph

See comments at 5.3.16 (above)

#### **Implementation of the park and ride strategy**

5.3.18 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed measures to avoid abuse of main site car parking and even more workers travelling direct to the main construction site. However, it regrets that these steps are not developed enough to reduce the Stage 2 main site parking proposal, still considered (and at the time) too large by many.

5.3.19 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed controls for all but the unnecessarily large main site parking facility.

5.3.20 KcCPC note the content of the paragraph

KcCPC note and welcome the proposed measures, but suggest that there are other things that should be explored to bolster compliance;

- Transponder technology to facilitate access and real time tracking ('home to work to home')
- Funding and licencing patrolling vehicle lifter(s) to remove offending vehicles to a pound and enable a rapid, deployable response to reports.

5.3.21 KcCPC note the content of the paragraph

KcCPC is disappointed that the park and ride strategy is not yet fully developed and deployed (by way of a live pilot) at Hinkley Point C.

#### **d) Direct bus services**

5.3.22 KcCPC note the content of the paragraph

KcCPC note that direct bus services are yet to be finalised, but that currently "the modelling work has been based on a half-hourly service from Ipswich and Lowestoft during staff changeover periods. A minibus service to and from Ipswich would also be provided outside of staff changeover periods for approved visitors to the construction site and for visitors to, and residents of, the accommodation campus.

The Leiston bus service would on average run every ten minutes during shift changeover and start/end times. However, the frequency would vary depending on the predicted demand during that period. Minibuses from Saxmundham train station would run hourly to coincide with scheduled train arrival and departure times."

KcCPC assume that to encourage higher usage, all of the foregoing bus services are on a 'free to use' basis?

5.3.23 KcCPC note the content of the paragraph

KcCPC note that direct bus services from Ipswich and Lowestoft will be using the A12 and following the routes to the main construction site described and used by the respective Park & Ride buses. It also notes that "...The local Leiston service would follow the B1069 to the main development site, serving the High Street in Leiston..."

5.3.24 KcCPC note the content of the paragraph

KcCPC notes "...modelling has continued to be based on 200 workers travelling to and from the construction site by direct bus from Lowestoft and Ipswich...and that, in practice, it may well be possible to move more workers in this way"

**e) Total number of daily bus movements**

5.3.25 KcCPC note the content of the paragraph

KcCPC notes "...EDF Energy has estimated that up to 650 daily bus movements (325 return journeys) could occur at peak construction. These figures combine both park and ride and direct bus movements...comprise larger buses providing park and ride services and the Leiston service... smaller mini-bus sized vehicles would be suitable for the services from Ipswich, Lowestoft and Saxmundham station"

**f) Use of rail services by workers**

5.3.26 KcCPC note the content of the paragraph

KcCPC note the strength of support at Stage 2 for a more ambitious rail scheme including the use of it for transporting construction workers to and from site. Support included "...Suffolk Preservation Society, Railfuture East Anglia and the Orwell Astronomical Society."

5.3.27 KcCPC note the content of the paragraph

KcCPC note "...a single large freight train can avoid in the order of 50 HGVs or 100 HGV movements on the local road network..." and the assertion that "...a limited proportion of the construction workforce is likely to live sufficiently close to a rail station..." and that "attractiveness of using rail for workers is likely to be further limited...frequency...slow journey time...compared to travel by car or bus... park and ride and direct bus services can be more easily timed and flexibly adapted".

5.3.28 KcCPC note the content of the paragraph

With regret KcCPC note that EDF Energy "will not be exploring further the use of rail to transport construction workers".

5.3.29 KcCPC note the content of the paragraph

**g) On-site parking during construction**

5.3.30 KcCPC note the content of the paragraph

KcCPC is concerned that a potential 2,000 avoidable vehicle movements (per day) continue to be championed by EDF Energy by way of a dogged determination to retain an inordinately high car parking capability at the main construction site.

KcCPC note that EDF Energy do not evidence any exploration of alternatives.

KcCPC can only conclude that this dogmatic approach is to protect retention of 1,000 car parking through construction into operation and presumably through decommissioning. In short, a long commitment to on-site parking.

5.3.31 KcCPC note the content of the paragraph

KcCPC note that EDF Energy have not only restated their commitment to 1,000 on site parking spaces, they have also advanced thinly veiled threats that an even larger capacity on-site car parking facility could be justified based on the:

a) "...impact of a larger 7,900 construction workforce..."

- b) "...potential overlapping of car park demand based on the shift patterns"
- c) an esoteric assertion that "...additional vehicles arising from the 'weekend effect' (where NHB workers arrive in single-occupancy vehicles)"

KcCPC remain of the view that avoidance of unnecessary vehicle movements should be a significant plank of EDF Energy's overall strategy for the construction, operation and decommissioning of Sizewell C and a fundamental consideration in developing proposals and policies.

**5.3.32** KcCPC note the content of the paragraph

KcCPC is very concerned that EDF Energy are planning key infrastructure (i.e. Park & Ride facilities) will not be in place for the 'early years', but that on-site car parking at the Sizewell C site will be viable.

KcCPC believes that this further substantiates their view that EDF Energy are determined to achieve and maintain a minimum of 1,000 car parking spaces on-site from (or very near to) the get-go and are contriving circumstances and priorities to enable that to happen.

As a consequence, and in the interest of residents, business, tourism and the environment, KcCPC will be seeking assistance from the Planning Inspectorate when considering any application for a development order for Sizewell C, that impact avoidance measures (i.e. Park and Ride facilities) are in place, robustly managed and fully operational, prior to main site activity and other 'early years' provisions.

**h) Walking, cycling and travel planning**

**5.3.33** KcCPC note the content of the paragraph

KcCPC note with regret that EDF Energy will only consider "...the scope to encourage workers living in the local area to cycle directly to the main development site." after completion of the Stage 3 consultation.

Moreover, KcCPC note EDF Energy's work will only "...assess the existing network of local cycle routes and identify how to enhance existing facilities, working within existing highway land..."

**5.3.34** KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy to develop a CWTP and within that to encourage "...walking or cycling to the construction site and park and ride facilities where practicable, as well as the scope for encouraging higher levels of car-sharing..."

In respect to car-sharing, KcCPC still hold the view that a more challenging regime (3+) should be adopted, achieving car sharing ratios similar to other significant UK businesses (i.e. British Gas, MBNA, M&S Financial Services, etc.).

**5.3.35** KcCPC note the content of the paragraph

**i) Summary**

**5.3.36** KcCPC note the content of the paragraph

KcCPC note the incomplete content of this paragraph and assume that 5.3.36 and 5.3.37 should be considered as one contiguous paragraph.

**5.3.37** KcCPC note the content of the paragraphs 5.3.36 and 5.3.37 and have read them as a single entity.

KcCPC note that EDF Energy emphasise "...EDF Energy's transport strategy for the movement of the construction workforce would be to reduce significantly the scale of additional car traffic that would otherwise be generated on the local road network at peak construction." and whilst KcCPC acknowledge some steps have

been taken to reduce the number of car movements, in its considered view, were EDF Energy to be far more rigorous on traffic movement avoidance across Suffolk, an even greater reduction could be achieved.

5.3.38 KcCPC note the content of the paragraph in referring the reader to Chapter 6

#### **5.4 Transport strategy for moving materials and freight**

##### **a) Introduction**

5.4.1 KcCPC note the content of the paragraph

##### **b) Marine-led strategy no longer proposed**

5.4.2 KcCPC note the content of the paragraph replaying EDF Energy's position at Stage 2

"In the event that the rail and/or marine solutions, which remain EDF Energy's preferred strategy, prove to be impractical or not cost-effective EDF Energy may explore road-based scenarios for freight movement with appropriate mitigation of the resulting greater highway impacts that would arise."

5.4.3 KcCPC note the content of the paragraph

5.4.4 KcCPC note the content of the paragraph

5.4.5 KcCPC note the content of the paragraph

5.4.6 KcCPC note the content of the paragraph

5.4.7 KcCPC note the content of the paragraph

Although not mentioned in the preceding paragraphs, KcCPC assume that expert responders to the Stage 2 consultation have endorsed the conclusions of EDF Energy.

KcCPC look to EDF Energy to confirm their position, the position of expert responders and those of any statutory organisations, prior to the submission of any application for a development order.

5.4.8 KcCPC note the content of the paragraph

Although not mentioned in the preceding paragraph, KcCPC assume that expert opinions have been sought in respect to the proposal to install and operate a Beach Landing Facility.

KcCPC look to EDF to confirm their position, the position of expert opinion and those of any statutory organisations, in respect to the BLF, prior to the submission of any application for a development order.

##### **c) Material quantities to be moved**

5.4.9 KcCPC note the content of the paragraph

##### **Material quantities estimated**

5.4.10 KcCPC note the content of the paragraph

##### **Material quantities for the construction of two UK EPR™ units and ancillary buildings and structures**

5.4.11 KcCPC note the content of the paragraph

5.4.12 KcCPC note the content of the paragraph

KcCPC note that materials for the:



construction of the power station and supporting buildings total approximately 5.2 million tonnes comprising approximately 4 million tonnes for the main civil works, larger volume than at Stage 2

KcCPC note that due to spare capacity in the freight management model for utilisation of trains, no increase in the number of HGV's in the traffic modelling number for the rail-led strategy has been required.

The implication is that more HGV numbers will be required in the road-led strategy as a consequence of the growth in materials (referred to above). However, this is not confirmed in the paragraph.

5.4.13 KcCPC note the content of the paragraph

**Material quantities for Sizewell C specific elements of the construction programme**

5.4.14 KcCPC note there is no content at this paragraph

5.4.15 KcCPC note the content of the paragraph

KcCPC note the main construction items specific to Sizewell C are:

- site set up and infrastructure, including the access road, temporary and permanent crossings of the Site of Special Scientific Interest (SSSI) corridor, utilities and fencing;
- the accommodation campus;
- site offices and welfare;
- the green rail route into the main development site;
- the BLF for delivery of AILs during construction and operation;
- the cut-off wall required to support the earthworks/ excavation phase; and
- sea defences for the main development site.

5.4.16 KcCPC note the content of the paragraph

KcCPC note that estimates for these items largely "...remain provisional..." consequently, although not commented on by EDF Energy, KcCPC assume that transport forecasts are incomplete and therefore by implication the traffic model is not robust at the Stage 3 consultation

5.4.17 KcCPC note the content of the paragraph

KcCPC note that despite no robust estimates, "...using experience at Hinkley Point C..." EDF Energy currently estimate these elements would add "...a further 2.9 million tonnes to the total materials quantities required, comprising largely materials for concrete production and other building construction materials."

KcCPC question whether the level of preparedness of EDF Energy's thinking (that has a direct impact on traffic, and the connected impacts) at Stage 3 is sufficient for any application for a Development Order to be made without a further consultation round?

**Material quantities movements during the earthworks phase**

5.4.18 KcCPC note the content of the paragraph

KcCPC note that the current estimate of "...around 7.7 million tonnes of excavated material..." will need to be further refined as it is "...linked to decisions on building foundation depths and the precise location of the cut-off wall."

KcCPC is surprised that at the Stage 3 consultation, decisions on the foundation depth and location of the cut-off wall are still not firm enough to derive a firm estimate. As a consequence, KcCPC question whether the level of preparedness of EDF Energy's thinking (that has a direct impact on residents in the immediate area) at Stage 3 is sufficient for any application for a Development Order to be made without a further consultation round?

5.4.19 KcCPC note the content of the paragraph

5.4.20 KcCPC note the content of the paragraph

KcCPC note the "The quantity of fill material which could require importation is now estimated at around 2.2 million tonnes to balance the earthworks for the overall site." an increase on the position at the Stage 2 consultation.

KcCPC note that EDF Energy do not provide a transport impact (i.e. x,xxx additional HGV movements) arising from this increase. KcCPC note this is a shortcoming for other changes advised in the Stage 3 consultation. Is this a strategy to increase the opacity of the impacts of another series of changes, made between consultations?

In combination with the above, and in light of the recent experience at Hinkley Point C (in terms of workforce and traffic increases), KcCPC believes a further consultation should be undertaken prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

#### **Total material quantities**

5.4.21 KcCPC note the content of the paragraph and Table 5.2

KcCPC note the following since Stage 2:

24% increase (1.1 million tonnes) in Civils estimates  
25% increase (0.3 million tonnes) in M&E Phase estimates  
16% increase (0.4 million tonnes) in Sizewell C 'specifics' estimates  
9% increase (0.2 million tonnes) in imported fill material

**Overall an increase of 2 million tonnes** (no attributable traffic impact in Table 5.2)

KcCPC calculate the traffic impact of this 2,000,000 tonne increase in estimates since the Stage 2 consultation (at say 29 tonne loads per HGV) as potentially another 69,000 deliveries or 138,000 HGV movements.

5.4.22 KcCPC note the content of the paragraph

KcCPC note "EDF Energy will continue to refine its estimates of the volumes and types of materials requiring transportation." and "...EDF Energy estimates that around 10 million tonnes of material would require transportation to the main development site over the construction phase."

However, taking EDF Energy's own figures from Table 5.2 KcCPC calculate the figure to be closer to **11 million tonnes** comprising:

5.6 million tonnes in Civils & M&E  
2.9 million tonnes in Sizewell C 'specifics'  
2.2 million tonnes in imported fill material

**Overall 10.7 million tonnes**

KcCPC calculate the traffic impact of this 700,000 tonne variance in estimates (at say 29 tonne loads per HGV) would potentially be 24,000 deliveries or 48,000 HGV movements.

In combination with the above, and in light of the recent experience at Hinkley Point C (in terms of workforce and traffic increases), KcCPC believes a further consultation should be undertaken prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

**Material quantities arising from off-site associated developments**

5.4.23 KcCPC note the content of the paragraph

KcCPC note that "In addition...the park and ride sites, rail and highways improvements...are currently estimated to be in the region of 300,000 to 400,000 tonnes" KcCPC calculate the traffic impact of just this 33% variance (at say 29 tonne loads per HGV) would potentially be 3,500 deliveries or 7,000 HGV movements.

As a consequence, KcCPC believes that "...more precise quantity will be included as part of the application for development consent." is an unconscionable position and instead must necessitate a further consultation prior to any application for a Development Order being made.

That consultation should contain tabulated final estimates, with appropriately calculated +/- projected variances, along with a full statement of the anticipated impacts, prior to and post any contingent mitigations.

**d) Use of Sizewell Halt or new rail siding in early years**

5.4.24 KcCPC note the content of the paragraph

5.4.25 KcCPC note the content of the paragraph

5.4.26 KcCPC note the content of the paragraph

**e) Heavy Goods Vehicles in the early years**

5.4.27 KcCPC note the content of the paragraph

KcCPC note with concern that along with the unreadiness of key infrastructure for 'early years' EDF Energy forecast 300 HGV deliveries a day (600 movements), plus another 140 localised HGV movements along Lovers Lane, during the early years.

The details are not particularly clear, but KcCPC assume that the majority of the 300 HGV deliveries will emanate from the south and return in a southerly direction along the A12.

Assuming that this proposal advances, KcCPC want EDF Energy to use the opportunity to fully understand the 'real' impact of A12 use on a 'year-round' basis with a comprehensive and continuing impact analysis undertaken (noise, dust, air quality, etc.) through on-line monitors, at specific points in Kelsale cum Carlton:

**1] A12 immediate proximity** (Carlton Green, Curlew Green, Dorley's Corner, North Green West & Carlton Road East)

**2] A12 short distance propagation** (Kelsale Primary School, Kelsale Village Hall & Centre, Kelsale Church & Ronald Road Industrial Estate)

**3] A12 mid distance propagation** (East Green South, Tiggins Lane, North Green East & Clay Hills East)

All results to be available to KcCPC (and residents) in real time, on a free to view basis via the internet, made available to all residents by virtue of EDF Energy provided public access terminals in Kelsale School and Kelsale Village Hall & Centre.

The monitoring of results to form the basis of an ongoing dialogue between KcCPC and EDF Energy through construction, operation and potentially the decommissioning of Sizewell C.

The initial focus of the dialogue in the “early years” will be to agree impact mitigation measures to minimise the impact of EDF Energy traffic on the A12 and maintain and/or improve the environment for impacted Kelsale cum Carlton residents, businesses and ecology.

5.4.28 KcCPC note the content of the paragraph

KcCPC note with justifiable alarm the proposed level of HGV delivery traffic movements (under either a rail-led or road-led strategy) emanating from the South and travelling northward along the A12 from the J58 of the A14, and the reverse route for HGV's returning empty.

It also notes that the consultation omits any details of the routes being taken by HGV traffic bringing materials to a Freight Management Centre and the route for returning to their originating location. Therefore, KcCPC is not able to form a complete view of the wider traffic issues that Kelsale cum Carlton residents and businesses may encounter in; Suffolk, Essex, Cambridgeshire and elsewhere during the construction, operating and decommissioning periods.

Is EDF Energy's silence on these key considerations deliberate, or are they still awaiting an impact analysis?

Have discussions with SCC, ECC, NCC etc. taken place about the more widespread traffic impacts, particularly those in respect to HGV movements (delivery and returning journey's)?

KcCPC regard the absence of any information in regard to the HGV traffic discussed in the preceding comments as a fundamental flaw in the proposal being advanced by EDF Energy and would regard any application for a Development Order as premature.

Moreover, when and if this information is forthcoming, KcCPC believes that an additional consultation will be essential to comprehend the full impact of the Sizewell C development, operations and decommission.

5.4.29 KcCPC note the content of the paragraph

KcCPC note “EDF Energy's traffic modelling...the typical day is the focus...as this is most representative of the scale of impacts that could occur...” but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the ‘median’ (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.30 KcCPC note the content of the paragraph

KcCPC note “EDF Energy anticipates that in the rail-led strategy, ...peak construction period there would be:

- an average of 225 HGV deliveries per day; and
- up to 450 HGV deliveries on the busiest day....”

but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the ‘median’ (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.31 KcCPC note the content of the paragraph

KcCPC note “EDF Energy anticipates that in the road-led strategy, peak construction period there would be:

- an average of 375 HGV deliveries per day; and
- up to 750 HGV deliveries on the busiest day....”

but believes that residents, business and tourists are likely to experience all graduations of the traffic modelling output, and probably some not modelled.

As a consequence, KcCPC believes that the 'median' (commonly used measure of the properties of a data set in statistics and probability) should be used to reflect a more realistic daily experience.

5.4.32

KcCPC note the content of the paragraph

KcCPC note the laxity with which EDF Energy appear to reference their traffic forecasts –

“...average HGV movements would be lower than the peak...”

“...figures are averages for a typical day...”

“...on any given day the number of HGV movements could be higher or lower...”

“On infrequent occasions...”

“...and on the busiest days...”

“...HGV movements could be up to twice the average...”

KcCPC note that HGV movements are a critical facet of the Sizewell C construction activity, and have a potentially devastating impact on the everyday life of: residents, businesses, the environment, air quality, tourism, economic growth, the transit road network and many other attributes beyond the SCDC boundary.

KcCPC regard the apparent absence of rigour in bringing forward easily understood, robust forecasts in respect to HGV traffic (discussed in the preceding comments) and thence potential impacts, as a fundamental flaw in the proposal being advanced by EDF Energy and would regard any application for a Development Order as premature.

Moreover, when and if this information is forthcoming (in full), KcCPC believes that an additional consultation will be essential to comprehend the full impact of the Sizewell C development and beyond into operations and through into decommissioning.

5.4.33

KcCPC note the content of the paragraph

KcCPC note the exactitude with which EDF Energy are able to provide robust forecasts of some HGV movements (i.e. Lovers Lane LEEIE to secondary site access) at the micro level;

- “...70 HGVs per day...in the rail-led strategy...”
- “...and 140 HGVs per day in the road-led strategy...”

proving that EDF Energy does possess the capability to make robust forecasts without condition or caveat.

KcCPC wonder why EDF Energy appear to have adopted such a cavalier approach at the macro level?

Is it perhaps that, the total HGV movements to construct Sizewell C could lie between 500,000 and 750,000 and by inference, the diesel mileage of HGV lorries on Suffolk Coastal roads could be enough to go to the moon and back over 30 times?

5.4.34

KcCPC note the content of the paragraph

5.4.35

KcCPC note the content of the paragraph

KcCPC is concerned that from a Freight Management Facility [FMF] on the A14 East of J58 or a FMF off of the Old Felixstowe road one of the earliest obstacles on the journey to the Sizewell C main site is navigating the roundabout at A14 J58.

This junction, in an appraisal conducted for the SDCD Final Draft Local Plan identifies

- the A14 J57 to J58 as having a high Volume/Capacity in both peaks [8:00-9:00 & 17:00-18:00]
- the A14 J59 to J58 as having a high Volume/Capacity in morning peak
- the A14 J58 having a high Volume/Capacity in both peaks at the junctions for traffic on the A14 eastbound using the left turn filter lane to the A12
- the A14 J58 has a high Volume/Capacity in both peaks at the A12 approach to the signalised roundabout.

Both the A12 approach and circulating roundabout flow are near capacity

Moreover, the A14 is over or near capacity around Ipswich (from Junction 53 to 58) in both peaks, so if laden HGV's approaching the FMF are routing by the A14 or the Northbound A12, they exacerbate the identified Volume/Capacity issues.

**g) Impact of Light Goods Vehicle (LGVs)**

5.4.37 KcCPC note the content of the paragraph

KcCPC again note the laxity with which EDF Energy appear to reference their LGV forecasts –

"it is anticipated that the construction phase would generate a significant number of lighter goods vehicles movements, i.e. vans and small delivery vehicles that weigh less than 3.5 tonnes. These light goods vehicle movements would be used for a wide range of purposes, including the delivery of post, packages, food, consumables, specialist tools and equipment and other small items. Vehicles in this category would also include contractor's fleet vehicles and visitors to the site."

5.4.38 KcCPC note the content of the paragraph

KcCPC note and welcome the adoption of a consolidation facility at the southern Park and Ride, as if properly managed it should

- eliminate a substantial number of LGV movements
- reduce 'rat running'
- reduce 'fly parking'
- reduce 'off A12' self-routing through country lanes
- make a small contribution to reducing traffic impacts

However, KcCPC note that many courier companies serving the north of Coastal Suffolk are Norfolk and Cambridgeshire originated (including Amazon).

KcCPC recommend that EDF Energy seek agreement with all of the UK's major courier and self-delivery companies that they, pre-consolidate deliveries to the Sizewell C main site, campus and camp sites, further reducing unnecessary delivery movements.

It may also be sensible to replicate Sizewell C consolidation capabilities at the northern Park & Ride.

5.4.39 KcCPC note the content of the paragraph

KcCPC note (assume) that despite the consolidation referred to at 5.4.38 (above), EDF Energy estimate a further(?) 700 LGV movements per day "...on the local road network at peak construction and this has been included in the modelling. This is in the order of three times the daily average number of LGV movements recorded during the peak period of Sizewell B construction. This increase on the Sizewell B figure reflects that Sizewell C has two UK EPRTM units, and also includes an additional allowance for the busiest days.

The figure is therefore a robust estimate for traffic modelling and transport assessment purposes. On many days and periods of the construction phase, LGV movements are likely to be substantially lower. Given the wide variety of project purposes to which these vehicle movements relate, these movements have been taken to occur throughout the working day and from a wide variety of locations using various routes."

KcCPC note the use of the term "...the local road network..." implying that EDF Energy are not going to enforce the use of the primary routes (A12) to Sizewell C by LGV traffic.

KcCPC seek urgent clarification on this point and wish to make it clear that it opposes the use of the local road network by 'self-routing' LGV traffic just as vigorously as it does HGV and workforce traffic.

KcCPC regard any unwillingness by EDF Energy to address the potential 'self-routing' issues of all Sizewell C traffic classes as an abrogation of its moral duty of care to; the environment, residents, businesses, tourists etc. who will have to 'manage' in spite of the known and quantified impacts of the primary routing (i.e. A12, B1122, bypasses).

However, to also have to 'manage' daily lives with uncontrolled non-HGV self-routing on "...the local road network..." has the potential to inflict untold long-term damage on the environment, residents, businesses, tourism etc.

KcCPC look to EDF Energy to come forward with rigorous controls to safeguard the greater Suffolk Coastal area against the damaging impacts foreseen above.

## **5.5 Justification for the differences in the proposals for the rail-led and road-led strategies**

**5.5.1** KcCPC note the content of the paragraph and Table 5.1

KcCPC note the assertions made by EDF Energy under this paragraph, particularly those points made in the two bulleted inclusions.

However, as with many assertions made throughout the Stage 3 consultation, the lack of detail or supporting evidence, even in a graphic representation, weakens the faith KcCPC places in the underpinning narrative.

KcCPC understands that EDF Energy may be unwilling to place detailed information in the public domain, particularly as the Hinkley Point C development seems to bring forward new instances of poor forecasting on a regular basis.

Nevertheless, KcCPC believes that development of assertions made by EDF Energy within the Stage 3 consultation, albeit on an indicative basis (and not substituting good solid data where available), would enhance understanding of some of the issues and allow a more constructive response than is currently the case.

**5.5.2** KcCPC note the content of the paragraph

KcCPC note that there are marked differences between the rail-led and road-led strategies.

In respect to the Freight Management Facility, KcCPC is confused as to why the FMF is only applicable to the road-led strategy where:

- HGV traffic volumes range from 375 average at peak

but is not applicable to the rail-led strategy where:

- HGV traffic volumes go as high as 450 on busiest days

Surely marshalling freight carries benefits above a threshold, irrespective of the absolute numbers?

**5.5.3** KcCPC note the content of the paragraph

**a) Theberton bypass and Sizewell link road**

**5.5.4** KcCPC note the content of the paragraph

KcCPC note that EDF Energy has assessed the road traffic noise impacts on the B1122 under both the rail-led and road-led strategies (daily traffic volumes of 9,150 and 10,300 vehicles at peak construction - includes Sizewell C and general traffic.) It also notes the noise analysis showed impacts from traffic volumes in Theberton would, at times, be significant.

KcCPC note that whilst these results are clearly very concerning, EDF Energy does not indicate whether the results arise:

- solely as a function of traffic volumes
- as a result of the villages topology, and/or in combination with the traffic volume
- for another unique circumstance in Theberton
- as a result of the proximity of a proportion of premises to the road (and if so, what are the thresholds applied)

KcCPC also note that as well as noise "...other impacts in Theberton..." were mentioned as forming the basis of EDF Energy's decision to bypass Theberton.

KcCPC again point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach.

**5.5.5** KcCPC note the content of the paragraph

In respect to Middleton Moor, KcCPC again note that, "In Middleton Moor the noise impacts under the road-led strategy would also be significant at times."

KcCPC note that whilst these results are clearly very concerning, again EDF Energy does not indicate whether the results arise:

- solely as a function of traffic volumes
- as a result of the villages topology, and/or in combination with the traffic volume
- for another unique circumstance in Middleton Moor
- as a result of the proximity of a proportion of premises to the road (and if so, what are the thresholds applied)

The outcome however is that EDF Energy have determined that Middleton Moor (and Theberton in place of the standalone bypass) will be bypassed by a Sizewell link road, should the road-led strategy be adopted.

KcCPC again point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach.

**5.5.6** KcCPC note the content of the paragraph

**b) Freight management facility**

**5.5.7** KcCPC note the content of the paragraph

In respect to the Freight Management Facility, KcCPC is confused as to why the FMF is only applicable to the road-led strategy where:

- HGV traffic volumes range from 375 average at peak

but is not applicable to the rail-led strategy where:

- HGV traffic volumes go as high as 450 on busiest days



Surely marshalling freight carries benefits above a threshold, irrespective of the absolute numbers?

KcCPC note the assertion by EDF Energy that "The lower number of HGVs required for the rail-led strategy could effectively be managed using the Electronic web based DMS." again KcCPC point toward assertions that remain unsubstantiated in the consultation, but have generated a significant change in EDF Energy's approach. Surely providing the threshold/design limits for DMS would not have taken too much effort and in the opinion of KcCPC would have further bolstered the standing of the assertion.

#### **c) Timing of Heavy Goods Vehicle movements**

5.5.8

KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that provision of the Sizewell link road under the road-led strategy would result in a reduction in noise and vibration impacts benefitting residents alongside the A12 in Yoxford and on the B1122 in Middleton Moor and Theberton.

It also regrets that EDF Energy regard this as an opportunity to explore the extension of hours of operation of HGVs under the road-led strategy.

KcCPC also note that EDF Energy foresee the need for further noise assessment work would need to be undertaken in advance of the application for development consent at these locations, and at key points on the A12 such as Saxmundham, Marlesford and Little Glemham, in order to determine if extended hours of operation for HGV movements would be feasible.

KcCPC is appalled that within the Stage 3 documentation no consideration is given to residents of Kelsale cum Carlton at Mile Hill and North Green, who are directly impacted by the '11<sup>th</sup> hour' Sizewell Link Road proposal at Stage 3.

Moreover, KcCPC is aggrieved that they (Mile Hill residents) along with other Kelsale cum Carlton residents (adjacent to the A12) at; Curlew Green and Dorley's Corner, Carlton Road & Carlton Green have not been mentioned in terms of noise assessment or the impact of extended hours of operation.

It is clear that EDF Energy have taken a myopic approach to the Stage 3 Consultation and arrived at ill conceived, badly planned 'knee jerk' resolutions to complex issues that strike right at the heart of the soundness of their material delivery proposals for Sizewell C.

#### **d) Improvements to the East Suffolk line**

5.5.9

KcCPC note the content of the paragraph

KcCPC is very supportive of a rail-led strategy, but believes there is tremendous potential for a more ambitious approach than the Stage 3 proposals, based on heavier investment in enduring infrastructure, utilisation of night time movements, increased rail-head infrastructure at Leiston and broader discussions with both the rail operator (Greater Anglia) and Railtrack.

For example, have EDF Energy examined options with Greater Anglia including;

- Providing a southbound return shuttle train service between Lowestoft and Darsham
- Providing direct southbound travel via 'express' bus services between Darsham and stations to Ipswich
- Providing direct northbound travel 'express' bus services between Ipswich and all stations including Saxmundham to Darsham to pick up the northbound trains

A pedestrian link to Darsham Park and Ride could avoid congestion at Darsham station with turnaround buses.

Direct services from and to Darsham would avoid the problems associated with multi-drop 'rail replacement services'.

The size of buses providing services could be flexed to reflect destination demand, combined with service capacity at different times of the day (i.e. minibus, compact coach, coach and double decked buses).

KcCPC recognise that there would be an impact on average journey times, but believes correctly run these impacts could be minimised, whilst maintaining a valuable service up and down the Suffolk Coastal route. In essence, this type of strategy could release the Ipswich to Saxmundham track for further investment and use as a short to medium rail based 'materials artery' directly to the Sizewell main site and Sizewell Halt.

In suggesting this sort of approach, KcCPC understand they are open to criticism.

However, KcCPC believes that this type of thinking and open-mindedness is the only way to avoid the inevitable road crisis that will occur should; a Sizewell C road-led strategy, or even the currently proposed rail-led strategy be pursued.

KcCPC is mindful that a 'perfect storm' is building along the A14/A12 routes comprising:

- Sizewell C construction
- Increased signalisation of the A12
- Increasing Capacity/Volume A14 congestion
- SCDC's Local Plan 10,000 house building programme including Brightwell Lakes and Felixstowe and Saxmundham Garden Village initiatives
- Scottish Power Renewables Schemes (x4)
- SCDC's ambition for 'year round' tourism
- Increased commutes from SCDC Local Plan delivered housing to Martlesham, Ipswich & Felixstowe
- Traditional activity driven Felixstowe Port development
- The new RORO Felixstowe Port Developments

It is unconscionable to pursue individual strands of this outlook, without stepping back and examining the collective short and medium-term threats that they pose to; the environment, businesses, residents, visitors, and the health of individuals.

In the long term, KcCPC can visualise lasting damage being sustained to; infrastructure, flora, fauna and public health that may take tens of years, if ever, to fully recover from.

Consequently, however unpopular, KcCPC feel it is incumbent on them to suggest what may currently be viewed as unthinkable.

5.5.10 KcCPC note the content of the paragraph

See comments at 5.5.9 (above)

## 5.6 Management, monitoring and control of Heavy Goods Vehicles

### a) Routes, timings and caps on Heavy Goods Vehicle movements

5.6.1 KcCPC note the content of the paragraph

KcCPC note that EDF Energy "expects the project to be subject to planning requirements that would control the average number of HGV movements allowed over a period of time."

KcCPC also note that EDF Energy expect "These requirements could limit the overall number of movements, to not exceed the average numbers during peak construction that have been used in the transport and environmental assessments."

KcCPC is concerned that were the HGV maxima applied in any planning requirement as high as the "average numbers during peak construction that have been used in the transport and environmental assessments"

there will be daily impacts to Kelsale cum Carlton residents close to the A12, that might potentially damage their health and mental well-being.

Assuming that the planning requirement is at or nearing the “average numbers during peak construction that have been used in the transport and environmental assessments”, KcCPC insist EDF Energy gain a full understanding of the ‘real’ impact of A12 use on a “average numbers during peak construction” basis with a comprehensive and continuing impact analysis undertaken (noise, dust, air quality, etc.) through on-line monitors, at specific points in Kelsale cum Carlton:

**1] A12 immediate proximity** (Carlton Green, Curlew Green, Dorley's Corner, North Green West & Carlton Road East)

**2] A12 short distance propagation** (Kelsale Primary School, Kelsale Village Hall & Centre, Kelsale Church & Ronald Road Industrial Estate)

**3] A12 mid distance propagation** (East Green South, Tiggins Lane, North Green East & Clay Hills East)

All results to be available to KcCPC (and residents) in real time, on a free to view basis via the internet, made available to all residents by virtue of EDF Energy provided public access terminals in Kelsale School and Kelsale Village Hall & Centre.

The monitoring of results to form the basis of an ongoing dialogue between KcCPC and EDF Energy through construction, operation and potentially the decommissioning of Sizewell C.

The initial focus of the dialogue will be to agree impact mitigation measures to minimise the impact of EDF Energy traffic on the A12 and maintain and/or improve the environment for impacted Kelsale cum Carlton residents, businesses and ecology.

**5.6.2** KcCPC note the content of the paragraph

KcCPC note that “The routes which HGVs can use, and the times at which deliveries can be made are also capable of being controlled via planning requirements and obligations. The appropriate use of such commitments is something which EDF Energy will be considering further prior to submission of the application for development consent.” and will be seeking to ensure that the Planning Inspectorate use the full extent of their powers in this regard to safeguard the welfare and well-being of the environment, businesses, residents, visitors, and the mental and physical health of all individuals impacted, including other motorists on the Suffolk road network, EDF Energy employees and contractors.

**b) Monitoring of Heavy Goods Vehicle deliveries**

**5.6.3** KcCPC note the content of the paragraph

KcCPC note that “EDF Energy is proposing to adopt a range of measures to manage and control HGV movements to and from the main development site. This includes the implementation of an electronic web-based DMS. All contractors receiving and delivering goods and materials by HGV would be required to operate and participate in the DMS. Through this system, agreed deliveries to the site would be booked in advance and allocated to agreed delivery slots within the day.” KcCPC is unfamiliar with the capability of ‘DMS’ but notes that in the event a Rail-led strategy were proposed no FMF would be constructed and HGV deliveries would be direct to the Sizewell Main Site.

KcCPC also note that nowhere in the Stage 3 consultation is there any mention made of mitigating potential off route parking/lay-up by HGV drivers arriving ‘in area’ ahead of the delivery slot. How does EDF Energy intend to eliminate such practices?

KcCPC note that EDF Energy expect; “The system would provide a means of recording HGV deliveries to the site, ensuring that such deliveries are operating within any agreed controls and limits. It would also help to facilitate rapid electronic communication with suppliers in the event of any accidents, incidents or other project events that could lead to HGV deliveries being delayed or rescheduled.”

In the event of a significant HGV route closure and in the absence of the FMF, how does EDF Energy propose to handle HGV traffic already on or approaching the A14/A12 Ipswich area?

At peak times, the number of HGV vehicles impacted could be significant, and not readily accommodated on some of the A12 stretches and/or even able to be turned around with ease.

In the context of the above comments, KcCPC also note the final sentence, that "...as well as reducing the requirement for external holding of HGVs on the local road network..." and is concerned by the inference.

5.6.4 KcCPC note the content of the paragraph

KcCPC is unclear exactly what EDF Energy's intent is in respect to a DMS as it says:

"This includes the implementation of an electronic web-based DMS."

and

"EDF Energy has developed a DMS that is now operational for the Hinkley Point C..."

and

"this and other similar projects would inform the design and development of the DMS for Sizewell C"

and

"A similar system is, for example, operating for the management of container HGV movements to and from Felixstowe Port. It has proved effective..."

KcCPC understand that none of the above are mutually exclusive and that understanding what options are deployable is valuable.

However, at Stage 3 consultation KcCPC would expect EDF Energy to explain more readily their ambitions for the DMS they are looking to employ/deploy.

5.6.5 KcCPC note the content of the paragraph

KcCPC note and welcome the intention of EDF Energy to "...manage HGV deliveries to site using ANPR and/or Radio frequency identification (RFID) technology...to monitor and control the movement of HGVs on agreed routes" but are concerned at the implication of "...the movement of HGVs on agreed **routes**"

5.6.6 KcCPC note the content of the paragraph

KcCPC note the further information in regard to ANPR based systems and also that EDF Energy have an ANPR system operational at Hinkley Point C.

It is also noted that "Learning and experience from the operation of the Hinkley Point C system would continue to be incorporated into the procedures adopted for Sizewell C." unfortunately, EDF Energy make no comment on their experiences and the effectiveness of the Hinkley Point C implementation.

5.6.7 KcCPC note the content of the paragraph

KcCPC note the further information in regard to RFID based systems and their use in combination with communication between EDF Energy and suppliers.

KcCPC is interested whether EDF Energy have considered a RFID implementation in respect to LGV and workforce traffic movement monitoring and the safeguarding of the local road network against 'rat running', 'fly parking' and other potentially damaging driver behaviours?

5.6.8 KcCPC note the content of the paragraph

KcCPC note that "EDF Energy is committed to achieving a high level of compliance with agreed project controls in this area and to promptly addressing any breaches in compliance were they to occur." and consequently anticipates EDF Energy looking at potential LGV and workforce traffic implementations sympathetically.

KcCPC also note that "Further details of EDF Energy's proposed approach to the management of HGV movements to and from the site will be set out in a Construction Traffic Management Plan (CTMP). The development of the CTMP will be progressed in consultation with SCC." and therefore KcCPC anticipate that SCC will also reflect on the opportunities afforded by RFID in dealing with potentially damaging LVD and workforce driver behaviours and the subsequent impact on the broader Suffolk roads network and the attendant communities and residents.

#### c) Incident management

##### 5.6.9

KcCPC note the content of the paragraph

KcCPC note that, despite the A14/A12 being consistently (in the major part) proposed throughout the Sizewell C consultations as EDF Energy's routing for Sizewell C traffic, at this late stage "EDF Energy **anticipates** putting in place several approaches to address an incident or accident preventing normal timely access to the main development site via the agreed HGV routes.". KcCPC anticipated that, because of the sub-optimal nature of the A12 as a primary routing for the anticipated volume of HGV, LGV, Bus and car traffic associated with Sizewell C construction, EDG Energy would have already accumulated enough information to enable the full development of comprehensive and implementable Incident Management Policies and Procedures.

To not have done this going into Stage 3 of the consultation, seems to KcCPC, a grossly unsatisfactory position that must be remedied (and consulted on) prior to any application being made for a Development Consent Order.

To permit an application to be made without these vital safeguards having being scrutinised, is tantamount to dismissing the importance of residents, businesses, tourists and visitors being able to go about their daily lives without fear of encountering impediment at every turn.

In noting "This would include the development and implementation of communication procedures with the police, SCC and Highways England to give early identification or warning of any incidents/accidents or events which could prevent normal smooth access to the site via the approved routes. Depending on the nature and location of the incident, a range of alternative approaches may be adopted, including:

- following identification of an incident of concern, rapid communication would be made with suppliers to delay, reschedule or hold en-route planned HGV deliveries to the site;
- following identification of an incident of concern, HGV deliveries would be held at the FMF or the southern park and ride site;
- for deliveries already en-route, agreed diversionary routes would be used where the normal agreed route to site is unavailable, e.g. due to an accident;
- the southern park and ride facility at Wickham Market includes a Traffic Incident Management Area (TIMA) for holding HGVs in the event of an incident on the local highway network or the main development site (refer to Chapter 14 of this volume). The TIMA is required for both the rail-led and road-led strategies;
- the temporary holding at, or controlled release of, HGVs from the Sizewell C site, where these HGVs have already delivered goods and are ready to make their return journey; and
- the use of part of the LEEIE, which includes space for a holding area for HGVs, in the limited circumstances where direct access to the site may be temporarily unavailable."

KcCPC is forced to conclude that EDF Energy have applied little thought to the 'real-life' circumstances that readily occur as a result of the inordinate intensification of traffic on a route that will still comprise:

moderate lengths of single and dual carriageway, numerous embedded HGV deceleration/acceleration points, increased junction signalisation, several sections of single carriageway with descents/ascents, several 'cross flow turning' road junctions, etc.

Instead, the focus appears more closely aligned with what the first paragraph regards as "...putting in place ...approaches to address an incident or accident preventing normal timely access to the main development site via the agreed HGV routes."

KcCPC also note within the text, phrases that cause grave concern and need more explanation, specifically:

"...incidents/accidents or events..." – KcCPC would like to understand exactly what EDF Energy mean and what distinguishes; an incident from an accident, from an event

"...an incident of concern..." – KcCPC would like to understand what one of these is, as opposed to, presumably 'an incident of no concern'

"...agreed diversionary routes..." – as this is a Stage 3 consultation, KcCPC is particularly concerned that there appears to be no consideration of what these might be.

As there do not seem to be any proposals coming forward in Stage 3 regarding potential "...agreed diversionary routes...", KcCPC is gravely concerned that EDF Energy may be deliberately with-holding any proposals they have developed, lest they are as inflammatory as the 'left field' proposal of a Sizewell Link Road coming forward at this late stage.

5.6.10 KcCPC note the content of the paragraph

KcCPC consider that "EDF Energy will further develop strategies for incident management in consultation with SCC, Highways England, the police and other emergency services. Key elements of the proposals and approaches would be set out in a Traffic Incident Management Plan (TIMP) for the construction phase." is totally unsatisfactory for the foregoing reasons (see 5.6.9 above) and urge the Planning Inspectorate to bear this in mind when and if they consider an application for a Development Consent Order.

## 5.7 Summary of Sizewell C traffic impacts and mitigation

5.7.1 KcCPC note the content of the paragraph

KcCPC note the comments of EDF Energy in respect to congestion on the A14/A12 route and conclude that they understate the issues. For example, omitting mention of the A14/J58 with the A12, Martlesham Heath, etc.

KcCPC also note that EDF Energy position themselves as a non-contributor to pre-existing issues (identifying them as the responsibility of SCC as the local highway authority) and thereby presumably, absolving themselves of any responsibility for exacerbating congestion, even with the forecast inordinate increases in HGV, LGV, Bus and workforce car movements.

KcCPC does not know whether these assertions are correct either in terms of; remit, legality or ownership, but find the attitude disingenuous and perplexing.

Whether the Planning Inspectorate are able to redress a seemingly inequitable position through their planning remit remains to be seen, but for a considerable portion of Coastal Suffolk's population the ramifications of Sizewell C being approved on the basis of the current consultation condemns them to 10 years or more of potential purgatory.

5.7.2 KcCPC note the content of the paragraph

KcCPC note the comments of EDF Energy in respect to the B1122 operating "...well within its...traffic carrying and environmental capacity..." and thereby find it even more astounding that EDF Energy have chosen to force a new Sizewell Link road through farming land and wildlife habitat, rather than making step improvements in the B1122.

5.7.3 KcCPC will deal with the 'Reference Case' and 'With Sizewell C' comparisons in their response to Chapter 6.

**a) Peak construction**

**5.7.4** KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that "...Theberton bypass under the rail-led strategy or Sizewell link road under the road-led strategy, serve to not only remove through-traffic from the B1122..." which is stated in 5.7.2 (above) to be "...well within its...traffic carrying and environmental capacity...".

It further notes the EDF Energy assertion that the Sizewell Link will also "draw traffic away from other local routes through Leiston, Saxmundham and Tunstall." KcCPC remain unconvinced in respect to the assertion made about Tunstall traffic being drawn by the proposed Sizewell Link and welcome the opportunity to have sight of unequivocal evidence.

It is also noted that EDF Energy understand that a "...road-led strategy would result in more traffic overall than the rail-led strategy," but assert that "...traffic would be lower in Yoxford (on both the A12 through the village and on the B1122) and Westleton."

It seems perverse that EDF Energy are proposing a strategy that sees such a significant increase in overall traffic using the A12, and then in the same paragraph seeks to justify this damaging increase, by raising the spectre of lower traffic in Yoxford and Westleton.

**5.7.5** KcCPC note the content of the paragraph

KcCPC note the assertion that "Some routes would experience substantial increases in HGV and bus flows during Sizewell C construction, though in many cases the existing flow is very low and the total daily flow with Sizewell C traffic would not cause capacity issues." and in the absence of any of the "Some routes" being specifically identified by EDF Energy, are unable to make any comment.

KcCPC believes that unsubstantiated assertions like this one, made by EDF Energy at Stage 3 of a consultation are unhelpful and do not act in the public interest.

KcCPC also note that "EDF Energy recognises however that the effects of increased HGV and bus movements on the environment are important factors to be considered and these are discussed in the relevant PEI chapters in Volume 2."

**5.7.6** KcCPC note the content of the paragraph

KcCPC note the assertion by EDF Energy that "would remove all Sizewell C-related traffic from these villages, along with a significant amount of existing traffic." and believes categorical claims to be, fanciful at best, misleading empty promises at worst.

Moreover, claims regarding "would remove...existing traffic" are overly optimistic as unlike EDF Energy traffic, other traffic is something over which EDF Energy are unable to exert any control.

However, it does raise the issue as to how EDF Energy propose to deal with a traffic incident that closes the proposed bypass? Presumably given the assertion (above), no EDF Energy traffic would reroute through Farnham and Stratford St Andrew?

**5.7.7** KcCPC note the content of the paragraph

Specifically, KcCPC note "...there are no other locations where the addition of Sizewell C peak construction traffic necessitates mitigation...".

However, KcCPC notes that in EDF Energy's modelling of traffic flows, no consideration has been given to increases in traffic volumes occasioned by seasonal tourism. KcCPC recognises that the DoT's Transport Appraisal Guidance (TAG) indicates weekend and holiday periods should be avoided when undertaking an analysis.



However, recognising that Suffolk and the East Suffolk coast particularly, are significant tourist destinations, is it not in the interest of the public, SCC, East Suffolk Council and EDF Energy to fully understand the seasonal variations, allowing for realistic Sizewell C construction planning and appropriate mitigations to be put in place?

5.7.8 KcCPC notes that EDF Energy recognise the addition of Sizewell C construction traffic will see "...**Many locations** assessed would likely experience...re-routing of non-Sizewell C traffic...".

5.7.9 KcCPC notes that EDF Energy believes that "In most of these locations, the re-routed traffic volume is small...". however, as neither the "many locations" or their respective quantifications are included in the consultation, KcCPC remain unconvinced by the assertion, and call for EDF Energy to bring forward compelling evidence in support of their assertion.

5.7.10 KcCPC notes that despite the assertion that "...there are no other locations where the addition of Sizewell C peak construction traffic necessitates mitigation..." at 5.5.7 (above), EDF Energy conclude that "Some locations would experience a higher level of rerouting, particularly the single-carriageway stretch of the A12 at Woodbridge...".

Against this back-drop, KcCPC find it difficult to understand when EDF Energy consider the level of predictable re-routing high enough to warrant mitigation, let alone the unforeseen consequences that will invariably arise during such a protracted period of disruption.

KcCPC call upon EDF Energy to be transparent and provide full disclosure on the impact of construction traffic along; the A14 corridor from the westerly Suffolk county border, the A12 corridor from Colchester in the South through to the A14 J58, the A12 from A14 J58 north to Sizewell C, from Lowestoft south to Sizewell C and the local road network surrounding the A12 – to the coastal boundary in the East and the East Suffolk boundary to the West and North.

#### **b) Early years**

5.7.11 KcCPC note that "During the early years of Sizewell C construction, re-routing would also likely occur in some locations where congestion is already present in the Reference Case, for example on the A12 at Woodbridge."

KcCPC believes that in order to maintain a degree of control over the only significant north/south route through East Suffolk (and thereby the surrounding road network), it is pragmatic and necessary to insist that the EDF Energy construction traffic route(s) and associated infrastructure are in place prior to the initiation of any construction work at the Sizewell C Main Site.

5.7.12 KcCPC further note that EDF Energy intend that "Prior to completion of the mitigation proposals the construction traffic associated with the project would use existing routes through Farnham and Stratford St Andrew, Theberton and Yoxford. Although the construction workforce would be much smaller than at peak construction, meaning fewer worker trips and HGV deliveries to the main development site, there would be HGV deliveries to the associated development construction sites (park and rides, bypasses and junction improvements) and these trips would have significant impacts before the schemes are completed." As a result, KcCPC believes it may be necessary to further restrict EDF Energy and apply restrictions, such that all necessary works are delivered serially (or in parallel where sensible) northward on the A12, opening up the final 'construction' route step-by-step to all traffic. Similarly, the same restrictions should apply for construction work north and coming south to the Sizewell C main site.

5.7.13 KcCPC note the content of the paragraph

Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.14 KcCPC note the content of the paragraph

Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.15 KcCPC note the content of the paragraph



Please refer to comments at 5.7.11 and 5.7.12 (above)

5.7.16 KcCPC note the content of the paragraph

**5.8 A road-led or a rail-led strategy?**

5.8.1 KcCPC note the content of the paragraph

KcCPC note with grave concern the commentary provided by EDF Energy in this paragraph.

KcCPC note the attribution of “urgent” to Sizewell C, arising from the 2011 NPS EN-1.

KcCPC note that in 1.3.4 “...the need for new nuclear power remains significant...” and that “important that there is a strong pipeline of new nuclear power projects”.

However, as with any project or programme, KcCPC is very aware that the three prime levers available to influence the outcome are temporal, fiscal and qualitative.

Consequently, KcCPC views the last paragraph; “If the necessary improvements cannot be delivered in time, EDF Energy could not adopt the rail-led strategy. Equally, if the timescale for the necessary rail improvements cannot be committed to with certainty, adopting the rail-led strategy would risk the potential that necessary transport mitigation would not be in place in time to serve the project and we would be obliged to revert to delivery by road without having invested in the necessary infrastructure to support that strategy (in particular the Sizewell link road or the FMF).” as injecting a huge temporal imbalance into the programme. An imbalance that realistically can only be off-set by increasing the fiscal case or risking huge qualitative risk.

Judging by EDF Energy’s concluding words, it seems that the choice they wish to exercise is a decline in the qualitative position; at the cost to East Suffolk resident’s health and well-being, the ecology of East Suffolk, visitors and businesses in the area and potentially the projects deliverables.

KcCPC believes this to be the wrong approach, and were such a circumstance to arise it would be insistent that the Planning Inspectorate look very carefully at the broad implications and if necessary, make reference to the Government prior to making formal any recommendation.

5.8.2 KcCPC note the content of the paragraph

KcCPC note that “The rail-led strategy offers advantages for the bulk delivery of construction materials and we are continuing to pursue it closely with Network Rail. It would come at a cost, however, and we currently estimate that the rail-led strategy could involve an extra £80m of cost compared with the cost of providing the infrastructure for the road-led strategy.”

However, KcCPC believes EDF Energy are being disingenuous in suggesting that a rail-led strategy carries a ‘price tag’ of “an extra £80m of cost compared with the cost of providing the infrastructure for the road-led strategy.”

KcCPC has formed this view on the basis that the proposed road-led strategy is a stripped to the chassis de minimis solution that carries a huge degree of risk, most of which is going to be borne by East Suffolk residents, businesses, visitors and ecology.

Notwithstanding the above, KcCPC is clear that the option that reduces the impact of Sizewell C construction on; East Suffolk residents, businesses, visitors and ecology is a considerably more ambitious rail-led strategy, utilising in combination; the Green Rail Route, extending the Sizewell C main site railhead capacity and extending the capacity of the Sizewell Halt terminus.

KcCPC recognise that to achieve such a step change may necessitate previously unexplored options such as: more daylight deliveries, night trains, a dual track branch line, an agreement with Greater Anglian to run a

Lowestoft-Darsham shuttle, with express bus services provided to all stations south of Darsham, thereby releasing capacity on the Ipswich-Saxmundham line, etc.

KcCPC believes that; in the absence of a viable sea route, inadequate investment in A12 improvements and/or a direct Sizewell site road route, a much more ambitious rail-led option is essential, despite it still having impacts on many people throughout the Suffolk Coastal area.

5.8.3 KcCPC note the content of the paragraph and Figure 5.1

5.8.4 KcCPC note the content of the paragraph and Tables 5.3 & 6.2

KcCPC wish it to be noted that Table 5.3 is unclear and potentially open to mis-interpretation.

5.8.5 KcCPC note the content of the paragraph and Table 5.4

In the opinion of KcCPC, Table 5.4 is a vast simplification of the impacts that will be felt along the line of the A12 from A14 J58 in the south and Lowestoft in the north (including congestion propagation into the surrounding road networks).

Moreover, it omits to identify any wider road network issues on the A14 west of Ipswich and the A12 south of Ipswich arising from inbound HGV deliveries.

5.8.6 KcCPC note the content of the paragraph

KcCPC is concerned that the terminology used in this paragraph is incorrect, particularly:

“As explained earlier in this chapter, average HGV movements would be 225 per day under the rail-led strategy and 375 under the road-led strategy, with the differences greater again in the busiest days”

KcCPC believes it should read (as per table 6.1):

As explained earlier in this chapter, average HGV Deliveries would be 225 per day (450 movements) under the rail-led strategy and **375 Deliveries** (750 movements) under the road-led strategy, with the differences greater again in the busiest days

## 5.9 Next steps to inform the Transport Assessment

5.9.1 KcCPC note the content of the paragraph

5.9.2 KcCPC note the content of the paragraph

5.9.3 KcCPC note the content of the paragraph

KcCPC note the inference that all numbers provided by EDF Energy thus far will be subject to further change, prior to submission to the Planning Inspectorate.

In that connection KcCPC is intrigued how the selection of a rail-led or road-led option will significantly change the car volumes as per “...freight mode split for the rail-led and road-led strategies in order to inform the resultant car, LGV and HGV traffic volumes...”.

Perhaps EDF Energy could advise all consultees of the correlation?

5.9.4 KcCPC note the content of the paragraph

KcCPC at this stage would have expected “The programme of mitigation implementation ...refined to further reduce, mitigate and then manage the impacts of construction traffic on the highway network during the early years of the project’s construction.”

In contrast to a rather modest ambition to "...mitigation implementation will be considered and refined to manage the impacts of construction traffic on the highway..." which implies little more will be achieved!

5.9.5 KcCPC note the content of the paragraph

5.9.6 KcCPC note the content of the paragraph

**6. Traffic Modelling (Volume 1, Pages 108 to 157)**

**6.1 Introduction**

**a) Overview of traffic modelling**

6.1.1 KcCPC note the content of the paragraph

KcCPC is concerned that Traffic Modelling is seemingly not being undertaken for:

- 1] Sizewell C - Operational Phase impacts
- 2] Sizewell C – Outage & Maintenance impacts
- 3] The combined Sizewell B & C Outage & Maintenance impacts with 3 reactors live on site

6.1.2 KcCPC note the content of the paragraph and Figure 6.1

6.1.3 KcCPC note the content of the paragraph

KcCPC is concerned that the EDF Energy VISUM traffic model 'reference case' is being treated as a 'black box' with no specific referencing of what is included and what is excluded, and the underpinning rationale.

This is particularly concerning as there is a significant programme of work in the pipeline in East Suffolk, much of which currently active. Moreover, the aspirations of Waveney and SCDC (combining to form East Suffolk) for the construction period also have an impact, as identified in the respective Local Plans.

This issue typifies a thread of opacity that runs throughout the Stage 3 consultation and is highly regrettable at such an important point in the process.

6.1.4 KcCPC note the content of the paragraph

**b) Derivation of traffic flows**

6.1.5 KcCPC note the content of the paragraph

6.1.6 KcCPC note the content of the paragraph

KcCPC whilst able to deal with the conceptual treatment of HGV & Park and Ride traffic (i.e. FMF to Sizewell C, returning to A14 J58) are less clear how the treatment of LGV and workforce cars are treated. (i.e. destination known...but origin assumptions?). The latter is of course critical to communities adjacent to the A12 as they often interface a wider areas traffic as a gateway to the A12.

Why have EDF Energy chosen to keep this critical information from impacted communities?

6.1.7 KcCPC note the content of the paragraph Figure 6.6

KcCPC is concerned that seemingly there is no direct monitoring of the A12 traffic flow between Point U at Farnham and Point Y at Yoxford, despite the current daily average declining from 18,900 (Point U) to 14,700 (Point Y).

As a consequence, KcCPC cannot comprehend how EDF Energy can give a robust portrayal of daily traffic flows on the upper A12 between these two points, let alone along its length.

6.1.8 KcCPC note the content of the paragraph

Please refer to comments at 6.1.7 (above)

**c) Chapter structure**

6.1.9 KcCPC note the content of the paragraph

**6.2 Without Sizewell C' traffic modelling**

6.2.1 KcCPC note the content of the paragraph

6.2.2 KcCPC note the content of the paragraph and Figure 1

**a) Base traffic model**

6.2.3 KcCPC note the content of the paragraph and Figure 1

**b) Reference case traffic model**

6.2.4 KcCPC note the content of the paragraph

Please refer to comments at 6.1.3 (above)

6.2.5 KcCPC note the content of the paragraph

Please refer to comments at 6.1.3 (above)

6.2.6 KcCPC note the content of the paragraph

KcCPC is interested to note that:

"...modelling conducted thus far does not suggest future traffic growth up to the time of Sizewell C peak construction would lead to a significant change in traffic conditions across the local road network, or to material detrimental effects in the form of significant increases in journey times or deterioration in junction performance."

KcCPC is concerned that the preceding paragraphs make no reference to the methodology for determining journey times and junction performance, focussing instead on flows. Why are these important facets not made clear?

Moreover, evidence in SCDC's Local Plan Evidence seems to contradict these assertions, particularly in respect to the approaches to the the A14 J58 junction with the A12, and the flow congestion on the roundabout. Why is this?

6.2.7 KcCPC is concerned that EDF Energy are seemingly prepared to; commentate on pre-existing or forecast (i.e. modelled) unsustainable congestion in specific areas (i.e. Woodbridge), recognise that the additive impact of Sizewell C will do nothing but exacerbate the problem and then presumably wash their hands of any responsibility for the future?

KcCPC recognise that the responsible Highway Authority has a significant role to play going forward. However, this ostensibly 'maverick' approach to future compounding impacts on residents, businesses, tourists and other parties, does not seem like that of 'considerate neighbour' seeking to establish sound relationships for the long term.

6.2.8 KcCPC is again concerned that EDF Energy once again resort to being a commentator in respect to the SCC outline business case "for major improvements along sections of the A12, known as the Suffolk Energy Gateway scheme (SEGway) (Ref. 6.1). The strategic case sets out that SCC recognises congestion as an issue on single carriageway sections of the A12 close to Woodbridge and that it considers this could be resolved through largely online improvements." but should perhaps be more concerned with what the compound impacts of the business case falling would be, on not only residents, businesses, tourists and other parties, but

also on EDF Energy's ability to deliver to a plan. Perhaps EDF Energy's 'Sizewell C Risk Log' could attest to their contingent plans?

6.2.9 KcCPC note the content of the paragraph

Please refer to preceding comments (above)

**c) Modelled time periods**

6.2.10 KcCPC note the content of the paragraph

6.2.11 KcCPC note the content of the paragraph

6.2.12 KcCPC note the content of the paragraph

KcCPC is perplexed by the phrasing of this paragraph, particularly reference to "as well as periods when there are expected to be higher volumes of Sizewell C development-related traffic". As the project owner, project planner, traffic modeller and author of the Stage 1 to 3 Consultation, KcCPC had anticipated EDF Energy would know when higher volumes of Sizewell C development-related traffic would occur? Is this not the case?

6.2.13 KcCPC note the content of the paragraph

6.2.14 KcCPC note the content of the paragraph

6.2.15 KcCPC note the content of the paragraph and Figure 6.2

KcCPC note the inclusion of the bar chart at Figure 6.2. However, without any metric or scale, the illustration is totally meaningless. It is alarming that with a wealth of data available, the modelling is reduced to a chart of such ineptness.

6.2.16 KcCPC note the content of the paragraph

KcCPC note the total lack of respect shown to the potential audience in the construction of this paragraph

"Both highway network traffic flows, and those associated with Sizewell C construction, are lower at weekends than on weekdays during the "neutral months" of April – June and September – October that are used in traffic modelling. Therefore, effects and mitigation are assessed from the weekday modelling results. The variation of traffic flows during the Summer is described later in this chapter."

KcCPC regard the content of the paragraph as being contrived to provide as little clarity as possible.

6.2.17 KcCPC note the content of the paragraph

KcCPC note the assertion that "The combination of the use of these modelling time periods and data, along with traffic growth assumptions for the reference case model, means that the traffic model is reflecting the existing traffic volume on the network and the future traffic conditions which could apply by the time of Sizewell C construction." However, it believes that this is misleading, as any model can only aim to simulate the current (which can be tested for accuracy by observation) and potential conditions.

To reflect (i.e. replicate) future traffic conditions, is something that can only be tested after the event.

Does EDF Energy have evidence that the model created for Hinkley Point C has; from inception of construction, through to the present day been wholly accurate? If it has not been accurate, what degree of variance has been experienced?

**d) Sizewell B outage**

6.2.18 KcCPC note the content of the paragraph

KcCPC presume "So that the future year assessments are robust, trips generated by these periodic Sizewell B outages have been incorporated in all future year (reference case and with development) modelling scenarios." Refers only to the Sizewell C construction period, as presumably 'In Operation Years' will have to deal with 3 rolling Outage cycles (i.e. Sizewell B, C (A reactor) and C (B Reactor)?)

6.2.19 KcCPC note the content of the paragraph

6.2.20 KcCPC note the content of the paragraph

**e) Network seasonality**

6.2.21 KcCPC note the content of the paragraph

6.2.22 KcCPC note the content of the paragraph

KcCPC is concerned that two different assertions are made in respect to the pre-Stage 2 analysis undertaken, neither of which contain any quantification, instead using terms such as "...daily traffic flows in August are broadly similar to those in May).

KcCPC note that the first assertion omits the A12 (presumably amongst others), whilst the second assertion omits the A14 (again, presumably amongst others). KcCPC suggest that this leaves both assertions open to accusations of being misleading and/or potential misinterpretation.

Throughout the Stage 3 Consultation documents, EDG Energy continue to make assertions unaccompanied by suitable evidential data, instead referring out to different paragraphs, chapters, sections or omitting any substantiating evidence at all.

6.2.23 KcCPC note the content of the paragraph and Figures 6.3 and 6.4

KcCPC is disturbed at the level of unnecessary obfuscation employed by EDF Energy in paragraphs 6.2.23 and 6.2.24, rendering both paragraphs virtually unfathomable to anybody but a VISM analyst.

As for Figures 6.3 and 6.4, it is somewhat tenuous to assert that comparisons between two months constitute trends (*Trend definition - A pattern of gradual change in a condition, output, or process, or an average or general tendency of a series of data points to move in a certain direction over time, represented by a line or curve on a graph.*).

6.2.24 KcCPC note the content of the paragraph and Figure 6.2

See comments at 6.2.23 (above)

In respect to Figure 6.2, the reader is left in no doubt that "Analysis has shown that this is the busiest weekday during May, as Figure 6.2 shows." but once again EDF Energy have failed to put any quantitative evidence on the figure, adjacent to it, or even refer out to a source data set.

See comment at 6.2.2 (above) regarding the omission of substantiating evidence and quantifications.

KcCPC wish to understand what "around 85% of the workforce would be present on any given Friday and around 50% on a Saturday" specifically in respect to the 50% on Saturday, does this mean 50% at work, or 50% at work or on campus or 50% on campus...or another qualification?

6.2.25 KcCPC note the content of the paragraph

KcCPC note "DfT Transport Analysis Guidance (TAG) advice (Ref. 6.2) that the assessment of highway traffic effects should be based on neutral periods, i.e. weekdays during neutral months, avoiding weekends and holiday periods". However, KcCPC believes that unlike some more urban areas during weekends and holiday periods, the Suffolk Coastal area (as a day trip and holidaying destination) does see significant increases in day tripper and tourist traffic, which should reasonably be taken into consideration in the EDF Energy traffic

modelling activity. Not to do so may lead to inordinate delays to all traffic types (including EDF Energy construction traffic) during good weather and traditional holiday periods.

KcCPC note the assertion made by EDF Energy that "Furthermore, the application for development consent relating to Hinkley Point C presented similar findings in terms of network seasonality, in that specific roads were shown to have slightly higher flows at certain times of the day during Summer months, but the development was not assessed with these increased existing flows." but does not believe that this constitutes a prevailing precedent. KcCPC remains confident that an applicant to the Planning Inspectorate, might reasonably be expected to have explored the impacts of seasonal variance in an area where both day and extended stay tourism comprises such a significant part of the locality's economy.

6.2.26 KcCPC note the content of the paragraph

KcCPC note "the Sizewell C-related traffic flows reported at this Stage 3 consultation incorporate a larger construction workforce in combination with the peak number of HGV deliveries which in reality would be unlikely to coincide with the peak workforce."

KcCPC note 'early years' events at Hinkley Point C and in the absence of substantiating evidence are unconvinced by the reassurances made here.

6.2.27 KcCPC note the content of the paragraph

KcCPC maintain that current seasonal traffic associated with day trip and longer stay tourism is due to expand annually through to 2036, as year-round tourism initiatives outlined in the SCDC Final Draft Local Plan take effect.

6.2.28 KcCPC note the content of the paragraph

KcCPC note "a wide geographic area, including all potentially affected parts of the road network;" is included in the Stage 3 Consultation.

However, the extent of the revised modelling does not appear to be clearly identified in the Stage 3 Consultation documents, excepting a large geographic area described at **Figure 6.1**.

If **Figure 6.1** does indeed describe the extent of the revised modelling, it seems unlikely that the extent of the modelling would extend beyond (in the main) those routes identified as 'A Roads', presumably intensifying to cover 'B Roads' approaching the A12 coastal area.

KcCPC note "the busiest periods of the day and the busiest days of the week for Sizewell C traffic generation;" is included in the Stage 3 Consultation, but does omit consideration of weekends and holiday periods.

KcCPC draw attention to the comments made at 6.2.25 (above) regarding seasonal variations.

KcCPC note "modelling which incorporates both general future traffic growth across the network and the specific traffic associated with major developments expected to come forward by the time of Sizewell C early years and peak construction phases." is included in the Stage 3 Consultation, but does omit consideration of weekends and holiday periods.

KcCPC again note that, the specific inclusions and those excluded (under traffic associated with major developments) are not detailed by EDF Energy, making the checking of the integrity of the modelling foundation difficult to ascertain.

6.2.29 KcCPC note the content of the paragraph

6.2.30 KcCPC note the content of the paragraph

### 6.3 Traffic modelling of the Sizewell C peak construction phase

6.3.1 KcCPC note the content of the paragraph



KcCPC note the baseline Sizewell workforce of 5,600 and a further 500 at associated works, has been adjusted to maxima of 7,900 and 600 respectively for the purpose of modelling transport.

6.3.2 KcCPC note the content of the paragraph

6.3.3 KcCPC note the content of the paragraph

**a) HGV Delivery profile**

6.3.4 KcCPC note the content of the paragraph and Figure 6.5

KcCPC again note that the Figure 6.5 is open to misinterpretation and does not have numbers of HGV's, using instead "Percentage of HGV deliveries".

6.3.5 KcCPC note the content of the paragraph

KcCPC again note the vagueness relating to the road-led HGV movement profile making any accurate analysis difficult, if not impossible "This profile is defined for the rail-led strategy. In the road-led strategy, with more daily HGV deliveries, there is potential for the hours of delivery to be extended beyond 20:00, though this would not alter the daily traffic flows reported in this chapter".

KcCPC note "...there is potential for the hours of delivery to be extended beyond 20:00, though this would not alter the daily traffic flows reported in this chapter..." and are concerned that this may be misleading, insofar as if the daily movements remain constant, but the hours of operation change - then the delivery pattern may vary, potentially modifying the impact on roads, residents, businesses, tourists, nocturnally active mammals and birds.

**b) Car sharing**

6.3.6 KcCPC note the content of the paragraph

KcCPC once again restate the view that EDF Energy's commitment to reducing workforce car traffic impact is derisory. EDF Energy should be embracing a positive commitment to a 'greener working' car sharing policy targeted at achieving an overall average between 2.5 and 3.

A 1.1 average for workers attending the main site from a Home Base represents no car sharing policy. KcCPC regard 0.1 being achievable solely through worker pragmatism and self-interest.

The following links are provided to assist EDF Energy in finding a better car sharing arrangement.

<https://www.nidirect.gov.uk/articles/car-sharing>

<http://www.slough.gov.uk/parking-travel-and-roads/car-sharing-and-pooling.aspx>

<https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/service.page?id=hYs6xxESzRo>

<http://www.greensuffolk.org/travel/journey-planning/car-sharing/>

6.3.7 KcCPC note the content of the paragraph

KcCPC once again restate the view that EDF Energy's commitment to reducing workforce car traffic impact is derisory. EDF Energy should be embracing a positive commitment to a 'greener working' car sharing policy targeted at achieving an overall average between 2.5 and 3.

An average of 2 per car represents very little challenge to EDF Energy, particularly as they have so many levers available to them (i.e. individual contracts, the likelihood of co-located workers, secure car parking, etc.), indeed EDF Energy themselves note that Sizewell B exceeded 2 without compunction.

KcCPC would like to see EDF Energy taking a 'win, win' stance on car journey reduction, reducing parking at the main site and simultaneously rewarding co-worker groups undertaking to carry 3+ people by them qualifying for main site parking.

The necessary checks could be undertaken by gate security and those not wishing to comply would still have the park and ride service available, perhaps operating the lower thresholds suggested by EDF Energy at Stage 3 Consultation.

The following links are provided to assist EDF Energy in finding a better car sharing arrangement.

<https://www.nidirect.gov.uk/articles/car-sharing>

<http://www.slough.gov.uk/parking-travel-and-roads/car-sharing-and-pooling.aspx>

<https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/service.page?id=hYs6xxESzRo>

<http://www.greensuffolk.org/travel/journey-planning/car-sharing/>

6.3.8 KcCPC note the content of the paragraph

Please refer to comments made 6.3.6 and 6.3.7 (above)

**c) Non-work related travel by NHB workers**

6.3.9 KcCPC note the content of the paragraph

6.3.10 KcCPC note that "...non-work related leisure trips..." applicable to NHB workers are included in all the traffic analysis "...based on national travel statistics relating to leisure related trips" and wonder whether EDF Energy's extensive Hinkley Point C experience confirms the modelling assumptions?

In either circumstance what are the anticipated impacts?

**d) Weekend travel by NHB workers**

6.3.11 KcCPC note the content of the paragraph

KcCPC note that "NHB workers, who would live in the local area temporarily during the construction phase, are anticipated to travel from and to their permanent homes at the beginning and end of the working week..." and wonder whether EDF Energy's extensive Hinkley Point C experience confirms the modelling assumptions?

In either circumstance what are the anticipated impacts and temporal limits, outbound and inbound?

6.3.12 KcCPC note the content of the paragraph

KcCPC note the complexity of modelling given the different work shift patterns.

Nevertheless, KcCPC would like to understand the nature and periodicity of individual work patterns and what the anticipated impacts are of each with regard to the 'weekend effect'?

6.3.13 KcCPC note the content of the paragraph

**e) Visitors**

6.3.14 KcCPC note the content of the paragraph

6.3.15 KcCPC note the content of the paragraph

Are the assumptions (presumably only in part) evidenced at Hinkley C?

**f) Assessment basis**

6.3.16 KcCPC note the content of the paragraph

KcCPC is interested to understand:

- 1] How robust 'early years' modelled forecasts for Hinkley Point C have proven?
- 2] What percentage variance is there between forecast and actual (favourable or detrimental)?
- 3] What changes have been made to methodology and modelling techniques as a result?
- 4] What is the current likely forecast variance for EDF Energy's Sizewell C modelling?
- 5] What tracking of modelling forecasts are in place at Hinkley Point C?
- 6] What tracking of modelling forecasts are to be in place at Sizewell C?
- 7] What contingency is planned to mitigate adverse variances to forecasts (Hinkley Point C and Sizewell C)?
- 8] What are the thresholds for triggering mitigations to adverse variances to forecasts?

KcCPC note "the number of HGV deliveries per day is based on the assumption that only around 80% of the proposed number of trains may be achieved, in both rail-led and road-led strategies. If the full five trains per day (rail-led) or two trains per day (road-led) were achieved, the number of HGVs required per day would likely be lower." and would like to understand the projected range of the HGV delivery reductions arising under both the rail-led and road-led options.

6.3.17 KcCPC note the content of the paragraph

Please see comments at 6.3.16 (above) in connection with the scale of the potential HGV delivery reductions arising under both the rail-led and road-led options.

6.3.18 KcCPC note the content of the paragraph and Section 6.4

KcCPC will make comment on Section 6.4 when appropriate

**6.4 Peak construction traffic effects across the modelled area**

6.4.1 KcCPC note the content of the paragraph

KcCPC note that in the VISUM Traffic Model "...existing and development related traffic within the model can re-route to choose the best available routes..." and are interested to understand the degree to which the model reflects typical driver behavioural patterns and whether re-routing is enacted autonomously in reaction to simulated traffic flows? Or whether an algorithmic parameter model determines re-routing patterns and/or triggers threshold-based re-routing.

In any circumstance, KcCPC would like to know the reviewed performance of the Hinkley Point C modelling when compared to observed behaviours?

6.4.2 KcCPC note the content of the paragraph and references out to Table 6.2 & Figure 6.6

KcCPC note that "...modelling conducted to date also suggests that an amount of non-Sizewell C traffic would potentially re-route..." but that EDF Energy do not substantiate the assertion with the projected amount of self-re-routing applicable to the A12 element of the model and/or the surrounding road networks.

KcCPC would like to understand the 'delta(s)' modelled by EDF Energy and any applicable probability of them occurring, and under what circumstances.

**Table 6.2** KcCPC notes Table 6.2 and its contents.

KcCPC is concerned that as provided, Table 6.2 does not provide sufficient enough data to enable a full understanding of the existing traffic flow, the journey maps within it, any assumptions made about (or observed compositions of) flow mix and hence the behaviour of individual and collective flow elements. Consequently, KcCPC is unable to agree or disagree the assertions being made by EDF Energy regarding the forecast impact of Sizewell C construction traffic.

Amongst other concerns, KcCPC is unclear what assumptions have been made regarding component traffic elements, whether queueing algorithms have been applied and whether the degree of change to a flow pattern is materially impacted when HGV elements are injected into the flow in the densities forecast at peak construction times.

KcCPC is also concerned that, there appears to be no traffic flow data between Location U (A12 Farnham) and Location Y (A12 Yoxford), despite this A12 segment being proposed as the site for entry to the proposed Sizewell Link Road.

KcCPC wonder whether this omission is symptomatic of the undue haste obvious elsewhere in the proposal of a new route for a Sizewell Link Road, and the paucity of sound data associated with its proposal.

**6.4.3** KcCPC note the content of the paragraph

**6.4.4** KcCPC note the content of the paragraph and Table 6.1

**6.4.5** KcCPC note the content of the paragraph

Despite the claim that “As identified in Table 6.2 the majority of locations would likely experience some re-routing of non-Sizewell C traffic, when the Sizewell C traffic is added.” It is by no means clear to KcCPC that this is the case or that any of the subsequent assertions are sufficiently evidenced.

Once again KcCPC is forced to conclude that Table 6.2 is unnecessarily opaque (to the layman) and therefore not sufficiently clear to discharge the responsibilities of EDF Energy under this consultation.

Moreover, because of some of the previously identified short comings in the Stage 3 consultation documents (i.e. in respect to figures, evidence and clarity, etc.), KcCPC is forced to conclude this is by design and not by accident.

**6.4.6** KcCPC note the content of the paragraph

KcCPC remain unconvinced by traffic modelling claiming to be accurate to one decimal place i.e. “...Tunstall (location H) the re-routing of non-Sizewell C traffic is slightly greater at 3.4%” whilst the narrative remains so loose “...is due to some existing traffic previously travelling through Snape and Tunstall on this road to the A12 at Wickham Market now joining the A12 further north as a direct result of the two-village bypass provision.”

The former element of the assertion here seems at odds with logic, insofar as traffic routing via Snape and (then) Tunstall is southbound “...to the A12 at Wickham Market...”, thereby increasing the traffic flow at Tunstall.

Whilst the latter portion asserts that traffic elements are “joining the A12 further north”, implying the affected traffic flow is northbound.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.2 delivers clearly what is stated in this paragraph.

**6.4.7** KcCPC note the content of the paragraph

KcCPC note that whilst “3.4%” and “150 vehicles” are absolutes used at 6.4.6 (above), the immediately adjacent paragraph states “...it is only possible to identify that the traffic increases would lie somewhere within the quoted range.” KcCPC wonder which is the correct position of the EDF Energy’s traffic modelling activity? KcCPC also note that, “In practice, only part of the traffic might re-route, or none at all.” leading it to conclude that EDF Energy’s traffic modelling is certainly not ‘science’ and therefore any suggestions of levels of re-routing should be treated as pure speculation. In reality, re-routing is determined by individuals in vehicles, sometimes in an instant!

Further KcCPC note in respect to the A12 at Woodbridge “...already congested in the reference case, without the addition of Sizewell C traffic, which results in a more substantial level of potential re-routing away from this route with the project-related traffic included, at 1,900 vehicles per day or about 4.7% of the existing flow.” and question exactly what is portrayed by “...at 1,900 vehicles per day or about 4.7% of the existing flow.”?

Mathematically, 4.7% of the existing traffic flow at Location AA (37,800) is 1,776.6, whilst 1,900 vehicles is 5% of 37,800.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

**6.4.8** KcCPC note the content of the paragraph and Table 6.2

KcCPC is once again forced to question whether Table 2 has clearly and unequivocally reported “...under the road-led strategy the majority of locations are predicted to experience some potential re-routing of non-Sizewell C traffic and the volumes re-routed would be greater in more places than under the rail-led strategy. In most of these locations, the re-routing would not be noticeable as they are less than 5% of daily flows.”?

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

**6.4.9** KcCPC note the content of the paragraph and Table 6.2

KcCPC note that assertions that are made regarding the level of re-routing at locations A (Lovers Lane), C (Saxmundham Road, Leiston), I (Saxmundham), R (B1122 Yoxford), Y (A12 Yoxford) and AA (A12 Woodbridge).

In light of the narrative used by EDF Energy in the foregoing paragraphs (of 6.4) and the observations made (by KcCPC) for the same paragraphs, KcCPC is forced to conclude that it has no confidence in these numbers that supposedly “...demonstrate a more substantial level of re-routing under the road-led strategy (greater than 5% of daily flows)” when there is no evidence presented as to the origins and/calculations underpinning them.

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

**6.4.10** KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

6.4.11 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

6.4.12 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

6.4.13 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

6.4.14 KcCPC note the content of the paragraph and Table 6.2

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believe Table 6.2 delivers clearly what is stated in this paragraph.

However, through the widespread experience of Councillors and Kelsale cum Carlton resident, KcCPC is aware of the Woodbridge issues raised in this paragraph.

Consequently, whilst KcCPC agree that SCC must play some part in making improvement measures, it does not agree that EDF Energy can place all of that burden solely on SCC.

As a project Sizewell C is directly responsible for adding a considerable volume of traffic (with a significant heavy, slow-moving element) to the A12, over a considerable number of years. Consequently, KcCPC believes it must be beholden on EDF Energy to play a fuller part in alleviating the problems of its creation, including congestion exacerbation.

6.4.15 KcCPC note the content of the paragraph and Table 6.2

The truisms of EDF Energy in respect to the Two Village and Theberton bypasses whilst undeniable, barely constitute a valuable legacy capable of offsetting the huge unresolved issues by their use of the only significant north/south route available in the eastern coastal Suffolk area.

The reality is, the majority of access to Sizewell C is via a 30+ mile route comprising:

- a badly congested roundabout on the only trunk road in the County (J58 A14)
- up the de-trunked A12, the only significant north/south route serving all of the East Suffolk coastal area...
- ...and all of the communities and tourist attractions therein...
- ...comprising significant single carriageway elements...accessed by largely unclassified rural roads and lanes...
- ...onto a 'B' road (B1122) passing through or adjacent to villages and rural communities...
- ...leading directly to a network of largely unclassified rural roads and lanes

Whereas in contrast, the Hinkley Point C journey is one of less than 20 miles, where the core HGV route (circa 18 miles) is:

- from a modern key route, in the form of the M5
- via the A39
- taking in a bypass opened in 2015
- and thence onto the local route into Wick Moor Drove

6.4.16 KcCPC note the content of the paragraph and Table 6.2

KcCPC note the EDF Energy assertion that "There are no locations where the increase in daily traffic volume generated by the project construction causes the road capacity to be exceeded." yet research conducted in connection with the Suffolk Final Draft Local Plan (and available on the Evidence Base) states:

- 1] The A14 main carriageway between J57 & J58 has a high V/C in both peaks  
*Potentially impacted further by inbound HGV traffic going to the FMF or Sizewell C direct*
- 2] the A14 main carriageway from J59 to J58 westbound has a high V/C in the AM peak  
*Potentially impacted further by outbound HGV traffic from the FMF at Innocence Farm*
- 3] A14 J58 has a high V/C in both peaks at the junction for traffic on the A14 eastbound using the left turn filter Lane to the A12  
*Potentially impacted further by inbound HGV traffic going to Sizewell C direct and or accessing an Old Felixstowe Road FMF*
- 4] A14 J58 has a high V/C in both peaks at the A12 approach to the signalised roundabout. Both A12 approach and circulating roundabout flow are near capacity  
*Potentially impacted further by inbound HGV traffic going to an Old Felixstowe Road FMF, HGV traffic exiting an Old Felixstowe Road FMF bound for Sizewell C, empty HGV traffic leaving the Suffolk Coastal area after Sizewell C delivery, Sizewell C bound HGV traffic from an Innocence Farm FMF, Sizewell bound LGV and workforce car traffic*
- 5] A14 J53 to J58 eastbound is over or near capacity in both peaks  
*Potentially impacted further by inbound HGV traffic going to either FMF site or Sizewell C direct, Sizewell bound LGV and workforce car traffic*
- 6] V/C values are relatively high along the A12 from the A14 (J58) to Woodbridge. The worst affected junctions are the A12 roundabouts at Woodbridge.  
*Impacted by all Sizewell traffic entering the Suffolk Coastal area from the A14 J58 and/or A12 junctions south of and up to Woodbridge*
- 7] The A14 main carriageway is shown to be approaching capacity (V/C 85-99%) in both directions between J57 (Nacton) and J59 (Trimley St. Martin).  
*Potentially impacted further by inbound HGV traffic going to an Innocence Farm FMF and subsequently leaving an Innocence Farm FMF and using the J59 roundabout to circulate back westbound to reach Sizewell C via A12.*

The report also notes that "...improvements in capacity through the removal of bottlenecks whilst desirable in one location can have knock on impacts which would be less desirable than the existing congestion. For example, as traffic is more freely able to move into the network, the problem will simply move to another location. Equally, hard engineering and infrastructure solutions are not the only solutions available. Other solutions involve the optimisation of existing infrastructure and an emphasis on sustainable transport, through for example personal travel planning."

EDF Energy do not appear to have addressed any of the issues raised by this report (1 to 7 above), nor are they taking steps to 'bake in' personal travel planning (via challenging car share policies) as mentioned in the last sentence (above).

KcCPC is interested to understand the degree to which EDF Energy have modelled the 'knock on impacts' underlined above, when examining the potential impacts of the proposed programme of road changes accompanying the Sizewell C construction programme. There appears to be little or no comment in the Stage 3 consultation on this point, whether the action is being taken by EDF Energy and/or SCC.

KcCPC also note that, there is a planned intensification of signalisation at roundabouts on the A12 below Woodbridge and wonder what impacts EDF Energy have modelled as a consequence?



6.4.17 KcCPC note the content of the paragraph and Table 6.3

Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes Table 6.3 without absolute quantification of the number of movements, not just %age increases, delivers a clear picture of the impacts that will be felt on the ground.

6.4.18 KcCPC note the content of the paragraph, Table 6.3, Table 6.2 and Figure 6.5

KcCPC note the assertion that “...Sizewell C-related construction traffic is relatively well spread across the day.” but contest the accuracy of it, perhaps not in absolute terms but specifically in respect to HGV movements whereby Figure 5 seems to portray in excess 50% (three hours in excess of 17% per hour) of all HGV delivery movements being made between 7:00am and 10:00am.

Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation. Moreover, KcCPC does not believes that Table 6.3 without absolute quantification of the number of movements, not just %age increases, delivers a clear picture of the impacts that will be felt at the locations used by EDF Energy.

6.4.19 KcCPC note the content of the paragraph, Table 6.4 and Table 6.5

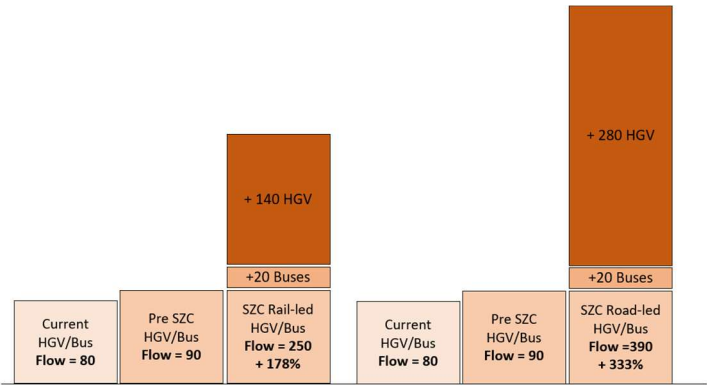
Once again KcCPC is forced to express their gravest concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

For example, rather than this (complete with incorrect calculations):

**Table 6.4 Peak period of Sizewell C construction – changes in HGV and bus flows (typical day) at the locations identified in Figure 6.6**

Location	Current daily HGV and bus flow	Pre-Sizewell C daily HGV and bus flow	Sizewell C buses (rail-led)	Sizewell C rail-led HGV	With Sizewell C rail-led daily HGV and bus flow	% increase	Sizewell C buses (road-led)	Sizewell C road-led HGV	With Sizewell C road-led daily HGV and bus flow	% increase
Lover's Lane, Lelston (location A)	80	90	20	140	250	178%	20	280	400	344%

Why not:



**Note:** The same error shown at Line 1 in Table 6.4 is repeated in Table 6.5 and many numbers appear broadly similar.

6.4.20 KcCPC note the content of the paragraph

6.4.21 KcCPC note the content of the paragraph

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation.



The use of "...the two largest proportionate increases in HGV and bus flow occur..." and a long rambling explanation regarding Lover's Lane seeks to distract attention away from the huge numbers impacting elsewhere.

Similarly, whilst going to extraordinary lengths to demonstrate the impact on the B1122 of HGV and Bus traffic increases and the potential benefits (sic) of the Sizewell Link road, EDF Energy do not even think to mention the impacts on the A12 communities of the growth on the southern approach from the A14 J58 right through to Yoxford.

**6.4.22** KcCPC note the content of the paragraph

KcCPC once again are forced to express their gravest concern at the vague narrative and the opacity of numbers used by EDF Energy in the Stage 3 consultation documentation.

In this case EDF Energy feel it necessary to commit virtually a whole paragraph to defending what might appear to be a "...substantial..." proportionate increase in "...from a low base...", further reassuring readers that it would "...not cause the road capacity to be exceeded."

The content of previous pages, as well the current paragraph does little to reassure the reader of the consistency and integrity of the EDF Energy approach, to the portrayal of the true impacts of increased traffic on the whole Suffolk Coastal area.

**6.4.23** KcCPC note the content of the paragraph and Table 6.2

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. Barely any mention is made of journey times, average A12 flow speed, flow deceleration/acceleration into and out of junctions, roundabouts, signalisation impacts, etc.

KcCPC note that little comment is made of the significant change in flow composition on the A12 after Sizewell C construction commences, and the impacts of that change in each segment of the A12 between A14 J58 and the B1122 at Yoxford.

KcCPC once again are forced to express their concern at the quality of the narrative and the opacity of numbers used (or inferred) by EDF Energy in the Stage 3 consultation documentation.

**6.4.24** KcCPC note the content of the paragraph and Tables; 6.2, 6.5, 6.6 to 6.11

**a) Traffic increases on the B1122**

**6.4.25** KcCPC note the content of the paragraph

**6.4.26** KcCPC note the content of the paragraph

KcCPC note that despite the obvious shortcomings of the A12 route beyond the end of the Wickham Market dual carriageway, EDF Energy have manifestly failed to identify and deal effectively with the issues.

Instead, the Stage 3 consultation sees EDF Energy seemingly agreeing their proposal of the B1122 at Stage 2 was flawed.

However, rather than taking a more considered view, EDF Energy have now elected to bring forward two alternative 'band-aids' to an already proven inappropriate route:

- firstly, a poorly conceived 'Link Road' that brings the larger portion of total traffic movements unnecessarily far north, before turning it back south and into the second...
- ...a single village bypass at Theberton that will neither appease the village or improve the journey to the Sizewell sites at Leiston.

KcCPC note that EDF Energy believes that should it go ahead; Coastal Suffolk residents will embrace the 'Link Road' as a lasting legacy of the Sizewell C construction.

Quite why EDF Energy believes that the loss of up to 120 hectares of good agricultural land will be celebrated by the residents of a predominantly rural area, when in its place they receive the blessing of a 'Link Road' from nowhere to nowhere is totally unfathomable.

6.4.27 KcCPC note the content of the paragraph

KcCPC note that EDF Energy propose to use the B1122 in the event of the link road becoming unavailable, from which it becomes evident the EDF Energy envision using the B1122 as a resilient route for all traffic types, presumably even if the closure of the Link Road is for a prolonged period.

KcCPC wonder how much reassurance this provides the villagers along the route of the B1122.

Once again KcCPC is forced to express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

6.4.28 KcCPC note the content of the paragraph

Once again KcCPC is forced to express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

6.4.29 KcCPC note the content of the paragraph

KcCPC is concerned that the South Bound traffic flow along the B1122 and then at Middleton Moor routing onto the Sizewell Link to join the North Bound traffic flow from the A12, will disrupt the Link Road flow and/or lead to waiting traffic queueing on the eastern portion of the B1122.

Why has EDF Energy not published data demonstrating the ability of the Link Road to absorb and integrate both traffic flows – particularly important as the Middleton Link Road junction is portrayed as a T junction.

KcCPC is also interested to understand how the reverse journey will be accommodated, requiring as it does the crossing of the oncoming A12 traffic flow?

The latter comments (above) also apply to the treatment of the proposed revised B1125 junction with the Link Road.

6.4.30 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself as a 'veil' for "flows increase significantly ...but the road capacity would not be exceeded".

6.4.31 KcCPC note the content of the paragraph

6.4.32 KcCPC note the content of the paragraph

**b) Traffic increases on the A12**

6.4.33 KcCPC note the content of the paragraph and Tables 6.8 and 6.9

Once again KcCPC express their concern at the vague narrative and the opacity (and integrity) of numbers used by EDF Energy in the Stage 3 consultation documentation. Table formats are inconsistent and (purposely?) more complex than absolutely necessary.

Please see comments and alternative method of portrayal at 6.4.19 (above)

KcCPC is especially unclear as to the precise meaning of the comment made by EDF Energy "...and the alternative routes offered by the proposed mitigation, at various locations." and seek direct referencing to the appropriate points on the Tables 6.8 and 6.9.

KcCPC note the repeated discontinuity of data between Location U (Farnham) and Location Y (Yoxford) without any explanation.

6.4.34 KcCPC note the content of the paragraph and Tables 6.8 and 6.9

KcCPC is not sure that the following points "...can be noted from the figures in Table 6.8 and 6.9" without additional data being available, however;

KcCPC note the assertion that "illustrate that existing and predicted future traffic flows on more southerly sections of the A12 are significantly higher than flows on the A12 at more northerly locations..." but wonder what EDF Energy are trying to infer in making it?

Again, KcCPC note the assertion that "the predicted increase in traffic arising from wider economic growth and development unrelated to Sizewell C is broadly similar to the effect related to Sizewell C..." but wonder what EDF Energy are trying to infer in making it?

KcCPC note the assertion that "...There is some evidence that non-Sizewell C traffic would choose other routes to avoid delay in this area, irrespective of whether Sizewell C goes ahead or not." but once again, no evidence is included with the assertion, referenced out, or seemingly within the Stage 3 consultation document pack.

6.4.35 KcCPC note the content of the paragraph

**c) Traffic increases elsewhere**

6.4.36 KcCPC note the content of the paragraph

6.4.37 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "...the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

6.4.38 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "...South of Yoxford..." by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

6.4.39

KcCPC note the content of the paragraph

KcCPC note the EDF Energy comment that "west of the Seven Hills roundabout (location S), a large volume of Sizewell C-related trips is expected including a significant proportion of HGVs. However, the Sizewell C traffic is a very small percentage of the existing traffic levels and is not expected to exceed the capacity of the junction."

Assuming that the junction referred to is A14 J58, KcCPC is concerned that Sizewell C related traffic (delivery & returning empty will indeed take the A12 southbound approach and circulating flows to or beyond capacity.

Taking into account other planned East Suffolk activity (close proximity housing developments, wind power-based initiatives, Felixstowe expansion of traditional container business, the RORO development, 2 x international cable-link initiatives, SCDC 'year round tourism' initiative etc.) and there can be no doubt that capacity of not only the A14 J58, but also the whole A12 will be near or over capacity.

The impacts on Suffolk Coastal area; residents, businesses, tourism and ecology will be very damaging and mental health as well as general well-being may be severely impacted, particularly in communities on or adjacent to the A12.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment.

Whilst KcCPC can understand why EDF Energy might wish to understate the impacts of the Sizewell C construction, it continues to be surprised at the 'arrogance' of the Stage 3 consultation, seemingly placing the importance of the Sizewell C development ahead of even the most basic of considerations for the people of the Suffolk Coastal area.

What is manifestly clear, is that EDF Energy believes that NPS's and the current state of the UK nuclear programme have strengthened their hand in respect to the Sizewell C development and that as a consequence they can be more audacious, bringing forward expedient proposals, rather than considered, well developed ideas.

#### **d) Summary**

6.4.40

KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes the detrimental impacts of Sizewell C construction activity on Coastal Suffolk's transport infrastructure has been "significantly reduced by the embedded mitigation included within the proposals set out in this Stage 3 consultation..." the implication being that, EDF Energy intend to take all the necessary steps to avoid, mitigate and compensate those impacted by the development.

EDF Energy draw particular attention to the actions they have included in their Stage 3 proposals to make good on the intent above:

"...campus reducing journeys to work..." KcCPC note the reluctance to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements

"...direct bus services..." KcCPC hope that EDF Energy have considered an alternatively fuelled bus fleet to reduce diesel pollution in Leiston, Lowestoft, Saxmundham, Ipswich, along the A12 and on the surrounding road network where used. If not, why not?

"...park and ride..." KcCPC hope that EDF Energy have considered an alternatively fuelled bus fleet to reduce diesel pollution in Wickham Market, Darsham, Leiston, along the A12 and B1122 and on the surrounding road network where used. If not, why not?

"...use of rail to deliver freight ..." KcCPC support a rail initiative, but believes a more ambitious programme would not only make further significant reductions in HGV traffic, but also give Coastal Suffolk a legacy with the potential for generating further economic and tourism benefits (i.e. working in partnership with The Longshop).

"...the beach landing facility (BLF) for Abnormal Indivisible Loads ..." KcCPC recognise a BLF may be necessary, but are hopeful that 'low impact' design and technology will minimise and mitigate any lasting ecological impacts.

"...of a two village bypass on the A12 to remove through-traffic from the villages of Farnham and Stratford St Andrew..." KcCPC recognise a pressing need to improve the A12 along much of its length.

In that connection, KcCPC is concerned that the proposal being brought forward at Stage 3 is not a material improvement in the A12, save for a significant uplift in the quality of life of residents adjacent to, or close by the road in Farnham and Stratford St Andrew.

It remains single carriageway and as a result of this proposal, two more roundabouts are being introduced into the A12, with the potential to decelerate/accelerate traffic flow into and out of the roundabout – a particular concern with high HGV content flows.

"...the provision of a Sizewell link road (road-led strategy) or Theberton bypass (rail-led strategy) to reduce the amount of traffic on much of the B1122..." KcCPC recognise a pressing need to improve the A12 along much of its length as well as access to and from; the Sizewell sites (A, B & C) and other associated 'energy' projects.

In that connection, KcCPC is concerned that the proposal being brought forward at Stage 3 is not a material improvement for B1122 communities, nor does it address the underpinning issue of an unnecessarily long northward journey up the A12 for construction traffic and subsequent to completion, 'outage', maintenance and decommissioning activities (Sizewell A, B & C).

The A12 remains single carriageway, as do the proposed roads and as a result of this proposal, another roundabout is introduced into the A12, with the potential to decelerate/accelerate traffic flow into and out of the roundabout – a particular concern with high HGV content flows.

Moreover; a valuable tract of valuable arable farming land is lost, B1122 communities become 'ringed' by roads, as yet unquantified ecological impacts will occur and a heavy flow of predominantly diesel powered traffic will reduce air quality significantly.

#### 6.4.41

KcCPC note the content of the paragraph and Tables 6.2 to 6.5

KcCPC note that EDF Energy acknowledge residual traffic impacts "...represent, in many cases, significant increases in traffic flows over conditions that would be experienced in 2027 if Sizewell C were not under construction."

However, KcCPC cannot agree with the EDF Energy assertion that "...they are unlikely to cause additional congestion or delays..."

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the Road-led option, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 32 seconds, with a corresponding southbound movement every minute.

Even under the Rail-led proposal, at peak working, this seemingly simple task would remain daunting with the traffic flows broadening to one HGV every 54 seconds and 1 minute 26 seconds respectively.

It must be noted that, after a short distance of dual carriageway following the proposed two village bypass, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.

Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

**6.4.42** KcCPC note the content of the paragraph

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

**6.4.43** KcCPC note the content of the paragraph

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

**6.4.44** KcCPC note the content of the paragraph

## **6.5 Traffic modelling of the Sizewell C early years construction phase**

**6.5.1** KcCPC note the content of the paragraph

KcCPC note the complexity of modelling concurrent, multi-variable, geographically dispersed impacts and wonder what assumed and tested degree of confidence has been achieved.

**6.5.2** KcCPC note the content of the paragraph

**6.5.3** KcCPC note the content of the paragraph and Table 6.12

KcCPC note nearly 45% of the 'associated development' workforce is attributable to the proposed 'Sizewell Link' road, whilst the 'Two Village bypass' accounts for less than 15%. (17% and 5.6% of the total 'Early years' workforce respectively).

KcCPC consider this disproportionate for a Sizewell Link proposal that has little, if any public support. KcCPC therefore can only consider it indicative of desire by EDF Energy, to force a Link Road as an expedient measure, rather than a responsible response to the concerns of communities on the B1122.

KcCPC again note the reluctance of EDF Energy to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements.

KcCPC is alarmed at the number of HGV movements (per day) being forecast without any of the mitigations being in place (split 85% from South, 15% from North):

Main site -	300 deliveries	600 movements
Darsham P&R -	21	42
Wickham Market P&R -	21	42
A12 Yoxford -	10	20
Two Villages Bypass -	60	120
Sizewell Link -	175	350
FMF -	30	60
<b>Total</b>	<b>617</b>	<b>1,234</b>

This represents an HGV load on local infrastructure (without any mitigation) of:

82.26% of the forecast for a Road-led option (Busiest Day)

and

137.1% of the forecast for a Rail-led option (Busiest Day)

**Note:** uses figures from the input parameters (Table 6.1 on Page 116)

#### a) HGV delivery profile

#### 6.5.4

KcCPC note the content of the paragraph and Figure 6.5

KcCPC note that the profile of deliveries is assumed to operate as at peak construction described at Figure 6.5 (and in the absence specific volumes/percentages) assumed to be:

	<b>Deliveries</b>	<b>#</b>	<b>Departures</b>	<b>#</b>
07:00-08:00	17.5%	108	2.25%	14
08:00-09:00	17.5%	108	6.25%	38
09:00-10:00	17.5%	108	11.00%	68
10:00-11:00	11.5%	70	14.50%	89
11:00-12:00	7.5%	46	14.75%	91
12:00-13:00	7.5%	46	12.25%	75
13:00-14:00	3.0%	19	9.00%	55
14:00-15:00	3.0%	19	6.00%	37
15:00-16:00	4.0%	25	5.00%	31
16:00-17:00	4.0%	25	4.00%	25
17:00-18:00	4.0%	25	3.75%	23
18:00-19:00	2.0%	12	3.75%	23
19:00-20:00	1.0%	7	3.50%	21
20:00-21:00			2.00%	12
21:00-22:00			1.50%	10
22:00-23:00			0.50%	3



**b) Car sharing**

6.5.5 KcCPC note the content of the paragraph

KcCPC again note the reluctance to implement mandatory (higher average) Car Share Policies to further reduce journeys to work by HB and NHB workforce elements

**c) Non-work related travel by NHB worker**

6.5.6 KcCPC note the content of the paragraph

**d) Weekend travel by NHB workers**

6.5.7 KcCPC note the content of the paragraph

6.5.8 KcCPC note the content of the paragraph

6.5.9 KcCPC note the content of the paragraph

**e) Visitors**

6.5.10 KcCPC note the content of the paragraph and Table 6.12

6.5.11 KcCPC note the content of the paragraph

**f) Assessment basis**

6.5.12 KcCPC note the content of the paragraph and Table 6.12

6.5.13 KcCPC note the content of the paragraph

**6.6 Early years construction traffic effects across the modelled area**

6.6.1 KcCPC note the content of the paragraph

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the 'Early Years' model, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 33 seconds, with a corresponding southbound movement every 53 seconds (9:00 – 10:00).

It must be noted that, after a short distance of dual carriageway up to Saxmundham, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.



Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

**6.6.2** KcCPC note the content of the paragraph

Once again KcCPC is forced to point out that if “In practice, only part of the traffic might re-route, or none at all.”, then EDF Energy should not rely on, or imply that re-routing will ameliorate traffic conditions at any point along a route, unless there is substantial evidence that corroborate the assertion, on a like-for-like basis. KcCPC do not believe any such evidence has been available in the EDF Energy Stage 3 consultation.

Moreover, KcCPC do not believe that any Hinkley Point C experience provides a valid insight into the vastly different road environment along the A14, A12, B1122 route and the surrounding road networks.

Consequently, it remains for EDF Energy to evidentially prove any Hinkley Point C comparator, which KcCPC do not believe has been done at Stage 3, or in the previous consultations.

**6.6.3** KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

**6.6.4** KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

**6.6.5** KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

KcCPC is also concerned that a significant portion of Tunstall lies within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (the boundary of which is defined by the B1069 road as it cuts diagonally across the Parish) and that unfettered re-routing to avoid congestion arising from EDF Energy impacts on the A12 is unconscionable.

KcCPC look forward to reviewing mitigations EDF Energy will bring forward to avoid the impacts their A12 traffic load will visit on the Tunstall area.

**6.6.6** KcCPC note the content of the paragraph

See notes at 6.6.2 (above)

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment.

**6.6.7** KcCPC note the content of the paragraph and Table 6.14

KcCPC note as pointed out by EDF Energy themselves, the use of percentage increases alone does nothing to demonstrate the absolute impact. (i.e. 100% increase on a base of 2 is +2, while a 1% increase on 1,000 is +10).

Consequently, KcCPC find the figures at Table 14 completely meaningless, like many of the tables furnished elsewhere in the Stage 3 consultation.

See notes and illustrative example at **6.4.19** that demonstrates how a consultant can show that it really does want engagement with consultees, rather than just ‘going through the motions’.

6.6.8 KcCPC note the content of the paragraph and Tables 6.13 and 6.14

KcCPC note an observation that is a function of mathematical certainty. That is to say if the term 'Peak Hours' is truly the peak hours of a day, then almost invariably they will be higher than the daily average!

6.6.9 KcCPC note the content of the paragraph and Tables 6.15

KcCPC note the unnecessary complication of Table 6.15, as it had already noted on Table 6.12 that Bus movements were nil for; Park & Ride, Ipswich & Lowestoft direct and that apart from LEEIE to main site, other movements were minimal.

Quite why this was deemed necessary is hard to imagine, other than to confound the reader?

6.6.10 KcCPC note the content of the paragraph

6.6.11 KcCPC note the content of the paragraph

KcCPC note that the B1122 could be subject to up to 600 HGV movements per day, it also notes that this corresponds to the 300 Main Site deliveries referred to previously at Table 6.12.

KcCPC also note that this daily pattern could continue for up to a year.

6.6.12 KcCPC note the content of the paragraph

KcCPC note that Farnham and Marlesford (and presumably all points south on the A12 to Woodbridge) could be subject to up to 970 HGV movements per day prior to completion of the two-village bypass.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment. KcCPC is particularly concerned for the communities on or adjacent to the A12 (i.e. Little Glemham and Marlesford)

6.6.13 KcCPC note the content of the paragraph

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

6.6.14 KcCPC note the content of the paragraph and Tables 6.16 & 6.18

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

**a) Traffic increases on the B1122**

6.6.15 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy to use the B1122 to provide access to the main development site for "...all Sizewell C-related traffic..." until completion of the Theberton bypass and/or a Sizewell Link road (if found to be appropriate). KcCPC also note the previously stated intention of EDF Energy to utilise the B1122 as an alternative route in the event of a closure effecting the Theberton bypass and/or a Sizewell Link road (if found to be appropriate).

6.6.16 KcCPC note the content of the paragraph and Table 6.16

6.6.17 KcCPC note the content of the paragraph

KcCPC note "all-vehicle daily traffic flows on the section of the B1122 between the junction with the A12 east of Yoxford and the Sizewell C construction site are **estimated** to range between around 3,450 and 5,150 vehicle movements per day." and are surprised that EDF Energy have not taken steps to fully understand the traffic flows, given the B1122 is in reality, the only existing access to the development site for all vehicle types.

KcCPC is concerned that "...forecasts..." are seemingly being based on "...estimated..." figures with a broad range (3,450 to 5,150) and are concerned whether this represents a robust mechanism going forward?

6.6.18 KcCPC note the content of the paragraph

KcCPC note "The B1122/Mill Street improvement would be in place by the very early stages of construction." and are interested as to why EDF Energy do not parameterise what the term "...very early stages..." really means? KcCPC assume that EDF Energy do have a current Project Plan, so presumably this would not be difficult?

6.6.19 KcCPC note the content of the paragraph

**b) Traffic increases on the A12**

6.6.20 KcCPC note the content of the paragraph and Table 6.17

KcCPC repeat their concerns regarding the A14 J58 pinch point (and the potential 'ripple effect' along the A14 East and West) and seek assurances from EDF Energy and SCC that the modelling of both entities is aligned and that no detrimental impacts are evident from the modelling.

Unlike EDF Energy, residents in the Suffolk Coastal area have to conduct their lives in the real world, dealing with the aggregate result of factors that EDF Energy have decided to ignore when conducting their traffic analysis.

For example;

Largely living east of the A12, Kelsale cum Carlton residents will potentially have to deal with crossing the A12 southbound flow in order to go north to; local destinations north of the Parish, Lowestoft, Norwich and other more distant destinations accessed via the A12, A47 and A146 (amongst other routes).

Potentially under the 'Early Years' model, this could involve a northbound flow comprising (on average) an EDF Energy HGV every 33 seconds, with a corresponding southbound movement every 53 seconds (9:00 – 10:00).

It must be noted that, after a short distance of dual carriageway up to Saxmundham, traffic is restricted to a single carriageway all the way north, past the A1095 Southwold turning, with little respite offered at a brief dual carriageway at Wangford. Consequently, the first 'safe' overtaking point is the dual carriageway approach at Kessingland.

Therefore, as currently happens during periods of heavy traffic (i.e. Bank Holidays, the Latitude Festival in July, the Henham Park Steam Rally in September, etc.), KcCPC anticipate substantial tailbacks developing northbound.

**6.6.21** KcCPC note the content of the paragraph and Table 6.17

KcCPC understand the EDF Energy find it necessary to restate their case in relation to existing road capacity issues, their view that Sizewell C Construction traffic will not materially exacerbate congestion on the A12, and where it does it is better than or equivalent to non-Sizewell C connected traffic.

It also is not surprised (as EDF Energy seemingly are) that northern A12 traffic flows are lower than those on the southern portion.

KcCPC is once again compelled to note that the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity, overlooks the destructive impacts and everyday consequences befalling Suffolk people trying to carry on their lives in the face of an increasingly hostile environment. KcCPC is particularly concerned for the communities on or adjacent to the A12 (i.e. Little Glemham and Marlesford) along its length.

KcCPC also note the 'early stage' nature of the assessment of environmental impacts across a substantial portion of the PEI.

KcCPC anticipate it will be necessary for EDF Energy to complete a full environmental impact assessment before making any application for a development order, as the immediate and adjacent areas to; the main Sizewell C site, the proposed Sizewell Link road site, the two villages bypass, and other impacted areas do contain important habitats for many species of flora and fauna.

As a result, KcCPC welcome and promote the need a further public consultation prior to EDF Energy making an application to the Planning Inspectorate.

**6.6.22** KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "...continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "...South of Yoxford..." by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

**c) Traffic increases elsewhere**

**6.6.23** KcCPC note the content of the paragraph

**6.6.24** KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "...the relative increase in either bus flows or overall traffic volume is substantial but this is from a low base level, and would not cause the road capacity to be exceeded". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

**6.6.25** KcCPC note the content of the paragraph

KcCPC is also concerned that a significant portion of Tunstall lies within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (the boundary of which is defined by the B1069 road as it cuts diagonally across the Parish) and that unfettered re-routing to avoid congestion arising from EDF Energy impacts on the A12 in unconscionable.

KcCPC look forward to reviewing mitigations EDF Energy will bring forward to avoid the impacts their A12 traffic load will visit on the Tunstall area.

**6.6.26** KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to "continue to engage with parish councils with regards to potential additional mitigation in these areas following on from this Stage 3 consultation."

However, KcCPC can't help but compare and contrast this 'small crumb of comfort', to the silence EDF Energy maintain in respect to Kelsale cum Carlton Parish, its residents (in general) and those specifically already impacted by the Sizewell Link Road proposals.

Renamed as "...South of Yoxford..." by EDF Energy, Kelsale cum Carlton is a Parish bisected by the A12 and whose residents will suffer inordinate problems just carrying on 'daily life' as a result of the projected HGV, Bus, LGV and workforce traffic on the A12.

In addition, residents living adjacent or close to the proposed Sizewell Link road on the A12 will suffer further damage to their lives, businesses, health and well-being, some of whom are already effectively 'blighted' by the revelations in the EDF Energy Stage 3 Consultation.

Moreover, the Kelsale cum Carlton communities at Curlew Green, Dorley's Corner, Carlton Green, North Green and the western end of Carlton Road will be impacted by the dramatic increase in road noise and pollution.

KcCPC is also concerned about a marked decline in air quality in these communities arising from the unconscionable increase in traffic volumes, especially the HGV and Bus traffic which is assumed to be largely powered by diesel.

**6.6.27** KcCPC note the content of the paragraph

KcCPC note that "On the A14, west of the Seven Hills roundabout (location S), a large volume of Sizewell C-related trips is expected including a significant proportion of HGVs delivering to the main development site as well as the associated development construction sites. However, the Sizewell C traffic is a very small percentage of the existing traffic levels and is not expected to exceed the capacity of the junction. EDF Energy will discuss the investigation of effects on the A12/A14 junctions 55 and 58 with Highways England, prior to the application for development consent." and anticipate any application for development consent going forward with an agreed position on A14 J58 between EDF Energy, Highways England and SCC.

**6.6.28** KcCPC note the content of the paragraph

KcCPC note that EDF Energy do not provide any quantification in support of the assertion that "the traffic flows are higher than those reported at Stage 2 for peak construction. The main reason for this is the inclusion of Sizewell B outage trips in all future year scenarios." and is very disappointed that this appears to be a feature of the Stage 3 consultation.

**d) Summary**

6.6.29 KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes "The mitigation proposals set out in Volume 2 would significantly reduce the effects of construction of Sizewell C on the surrounding highway network." With regret, KcCPC also notes that "...many of these measures would not be in place during the early years of the construction phase, currently taken to be 2022, which means that although the construction workforce would be much smaller than at peak construction, the effects could be greater in particular locations...." a sadly unnecessary situation driven principally by haste, rather than efficacy.

6.6.30 KcCPC note the content of the paragraph

KcCPC note that EDF Energy believes "There are significant increases in HGV volumes on the A12 and B1122... before the proposed bypasses that would remove these trips from Theberton, Farnham and Stratford St Andrew" and whilst KcCPC cannot dispute the assertion, it must point out that the proposals do just move the issue (to green fields!) and do nothing to reduce the overarching impacts on the Suffolk Coastal area as a whole.

6.6.31 KcCPC note the content of the paragraph

KcCPC note the overly complex structure of the paragraph, presumably intended to convince the reader that the modelling assumptions are 'worst case'?

However, the proposal that "...from this Stage 3 consultation, detailed consideration will be given to the programme of mitigation implementation which will be optimised to minimise the effects on the highway network..." does little to reassure this particular reader!

6.6.32 KcCPC note the content of the paragraph and Table 6.15

KcCPC note the EDF Energy assertion that the farther away from the construction site, the less impactful the traffic flow increases emanating on and around the A12!

EDF Energy also observe that apart from the A14, A12 and the B1122, the only other roads to suffer undue increases in traffic are Lovers Lane and the A145 at Beccles!

KcCPC note EDF Energy's assertion that "The increase on the A14 at Ipswich is small when compared to the existing traffic flows." but regard the potential impact as more significant, referring to the work of WSP in August 2018, prepared for SCDC as part of their Draft Local Plan.

**7. Main Development Site** (Volume 1, Pages 158 to 239)

**7.1 Introduction**

KcCPC is aware that qualified public interest groups, along with the Parish Councils adjacent and adjoining the town of Leiston are preparing their own responses to the Sizewell C development (Main Site). As consequence, KcCPC will be limiting their comments in regard to the Main Development Sites, where either qualification and/or proximity are not key requirements.

KcCPC reserve the right to make comment, qualified as "subject to KcCPC's view being agreed by those qualified and/or directly impacted".

KcCPC remaining silent on a point should not be construed as being either supportive or otherwise.

**7.1.1** KcCPC note the content of the paragraph and Figure 7.1

**7.1.2** KcCPC note the content of the paragraph

**7.1.3** KcCPC note the content of the paragraph

**7.1.4** KcCPC note the content of the paragraph

**7.1.5** KcCPC note the content of the paragraph, Figure 7.2 and Table 7.1

**7.1.6** KcCPC note the content of the paragraph

**7.2 Nuclear operation**

**7.2.1** KcCPC note the content of the paragraph and Figure 7.3

**7.2.2** KcCPC note the content of the paragraph

**7.2.3** KcCPC note the content of the paragraph

**7.2.4** KcCPC note the content of the paragraph

**7.2.5** KcCPC note the content of the paragraph

**7.2.6** KcCPC note the content of the paragraph

**7.2.7** KcCPC note the content of the paragraph

**7.2.8** KcCPC note the content of the paragraph and Figure 7.4

**7.2.9** KcCPC note the content of the paragraph

**7.2.10** KcCPC note the content of the paragraph

**7.2.11** KcCPC note the content of the paragraph

**a) Nuclear safety and design**

**7.2.12** KcCPC note the content of the paragraph

Generic Design Assessment

**7.2.13** KcCPC note the content of the paragraph

7.2.14 KcCPC note the content of the paragraph

7.2.15 KcCPC note the content of the paragraph

7.2.16 KcCPC note the content of the paragraph

Nuclear site licence

7.2.17 KcCPC note the content of the paragraph

7.2.18 KcCPC note the content of the paragraph

Fukushima

7.2.19 KcCPC note the content of the paragraph

Spent fuel and radioactive waste management

7.2.20 KcCPC note the content of the paragraph

7.2.21 KcCPC note the content of the paragraph

7.2.22 KcCPC note the content of the paragraph

7.2.23 KcCPC note the content of the paragraph

7.2.24 KcCPC note the content of the paragraph

#### **b) Decommissioning**

7.2.25 KcCPC note the content of the paragraph

7.2.26 KcCPC note the content of the paragraph

### **7.3 Design principles**

7.3.1 KcCPC note the content of the paragraph

KcCPC specifically note that:

"Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."

7.3.2 KcCPC note the content of the paragraph and Table 7.2

KcCPC specifically note:

5a. "Avoid redesign activity with the potential to cause programme delays either during pre-construction..."

6. Cost "To ensure commercial viability the Sizewell C Project needs to achieve real cost savings..."

6a. "...to avoid redesign costs, maximise the efficiency of construction..."

6b. "Monitor the cumulative cost impact of design changes."

7b. "Maintain viability by balancing high quality design within the required programme and budget."



8a. "Best environmental practice...taken into account...ensure high standards of environmental protection."

9g. "Minimise, where reasonably practicable, visual effects at night from lighting and light spill..."

10c. "Design the development, including lighting, access and fencing, to minimise disturbance to protected species, including at night..."

11a. "avoid or minimise likely significant impacts on other non-designated heritage assets including buried archaeology"

14. Access "Permanent access to and within the site must meet all operational requirements."

14a. "Provide a new access road from the north-west as the main operational access to Sizewell C, taking into account the surrounding environment."

Regrettably, KcCPC also note the absence of a focus within the "Design principles and brief" to construction being "efficient in the use of natural resources and energy" (see 7.3.1 above), particularly with regard to the delivery of materials into site.

7.3.3 KcCPC note the content of the paragraph and Table 7.2

#### **7.4 Permanent development**

##### **a) Introduction**

7.4.1 KcCPC note the content of the paragraph

7.4.2 KcCPC note the content of the paragraph

7.4.3 KcCPC note the content of the paragraph, Figure 7.5 and Table 7.3

##### **b) Sizewell C power station during the operational phase**

7.4.4 KcCPC note the content of the paragraph and Figure 7.6

KcCPC note with concern the intended incursion of the Sizewell C development into the SSSI

Nuclear safety buildings, including reactor buildings

7.4.5 KcCPC note the content of the paragraph

7.4.6 KcCPC note the content of the paragraph

7.4.7 KcCPC note the content of the paragraph

7.4.8 KcCPC note the content of the paragraph

7.4.9 KcCPC note the content of the paragraph

Turbine halls

7.4.10 KcCPC note the content of the paragraph

7.4.11 KcCPC note the content of the paragraph

7.4.12 KcCPC note the content of the paragraph

7.4.13 KcCPC note the content of the paragraph

7.4.14 KcCPC note the content of the paragraph

7.4.15 KcCPC note the content of the paragraph

7.4.16 KcCPC note the content of the paragraph, Figure 7.7 and Figure 7.8

Operational Service Centre

7.4.17 KcCPC note the content of the paragraph

7.4.18 KcCPC note the content of the paragraph

7.4.19 KcCPC note the content of the paragraph

7.4.20 KcCPC note the content of the paragraph and Figure 7.9

Interim spent fuel store

7.4.21 KcCPC note the content of the paragraph

7.4.22 KcCPC note the content of the paragraph

Forebays

7.4.23 KcCPC note the content of the paragraph

Changes to the electrical connection to National Grid substation

7.4.24 KcCPC note the content of the paragraph

7.4.25 KcCPC note the content of the paragraph

7.4.26 KcCPC note the content of the paragraph

KcCPC note a series of justifying paragraphs under 7.4.26. In general, they allude to detrimental impacts on the programme (presumably contrary to 5a in 7.3.2 above) and latterly the cost benefit of adopting "...overhead connection...".

KcCPC is not qualified to make comment on the assertions made, but do note that EDF Energy fail to provide any quantifiable evidence in support of their revised position.

7.4.27 KcCPC note the content of the paragraph, and Figures 7.10 to 7.13

7.4.28 KcCPC note the content of the paragraph

KcCPC note that as yet neither EDF Energy or National Grid are able to confirm how many existing pylons may need to be relocated to allow connection to a new substation. KcCPC note that the outcome of further National Grid consideration of the issue may have significant impacts on the visual amenity.

7.4.29 KcCPC note the content of the paragraph

KcCPC note that EDF Energy have "...included additional land within the SSSI..." to accommodate not just the installation of overhead lines, but their over-running of the SSSI on a permanent basis. EDF Energy contend "...there are unlikely to be any long-term impacts at ground level and no additional pylons would be required within the SSSI." KcCPC wonder whether there are existing sites where this assertion has been either confirmed or shown to be incorrect?

KcCPC also note that EDF Energy intend to include details "from National Grid on their approach to construction will be reflected in our application for development consent." and wonder whether this is for the

purpose of obtaining any required consents, rather than National Grid making separate application – it is currently unclear as written.

**c) Sizewell B Relocated Facilities**

7.4.30 KcCPC note the content of the paragraph

7.4.31 KcCPC note the content of the paragraph and Figure 7.14

7.4.32 KcCPC note the content of the paragraph

7.4.33 KcCPC note the content of the paragraph

7.4.34 KcCPC note the content of the paragraph, Figure 7.15 and Figure 7.16

7.4.35 KcCPC note the content of the paragraph

KcCPC note with interest the statement (in a Stage 3 consultation in respect to Sizewell C) by EDF Energy that, EDF Energy Nuclear Generation Ltd (NGL) "...intend to apply for these proposed works through a Town and Country Planning Act 1990 (TCPA) planning application to Suffolk Coastal District Council (SCDC). A scoping opinion was provided by SCDC in 2016 and pre-application engagement with SCDC and other key stakeholders will continue until determination of the planning application."

7.4.36 KcCPC note the content of the paragraph

KcCPC note with interest, the statements of EDF Energy (in a Stage 3 of a consultation in respect to Sizewell C) that "In applying for these proposed works through a planning application to SCDC, the Sizewell B Relocated Facilities Project would facilitate the Government's policy objective of more rapid development of new nuclear power, by ensuring earlier delivery of Sizewell C than if the relocation proposals were included as part of the application for development consent for the Sizewell C Project." and that "There is precedence for bringing forward early and/or preparatory works associated with Nationally Significant Infrastructure Projects (NSIP) under the TCPA, ahead of the grant of a Development Consent Order (DCO). This includes the site preparation works associated with the construction of two new nuclear reactors at Hinkley Point C, which were secured by a full planning permission (Local Planning Authority reference: 3/32/10/037) granted by West Somerset Council."

7.4.37 KcCPC note the content of the paragraph

KcCPC note "...it is important for EDF Energy to be sure that these works will be consented and undertaken. Therefore, the proposals for Relocated Facilities will be included within our application for development consent for the project."

7.4.38 KcCPC note the content of the paragraph

KcCPC note with interest, the statements of EDF Energy (in a Stage 3 of a consultation in respect to Sizewell C) that "The planning application to SCDC will be a mixture of detailed and outline proposals. A more detailed description of the proposed Relocated Facilities, including their design and proposed use..."

7.4.39 KcCPC note the content of the paragraph

KcCPC is surprised, considering the EDF Energy (Sizewell C project) inputs to Paragraphs 7.4.35 to 7.4.38 (above) that "**outage car park** – this is proposed to be located outside the Sizewell B station site security perimeter, at the northern end of Pillbox Field...The car park would be used during Sizewell B outages only..." KcCPC would have thought that in light of **items 6 and 7b at 7.3.2** (above) this potential 'cost saving' would have been realised (a 580 space car park, at what cost?!). Afterall, as is pointed out elsewhere in the Stage 3 consultation, 'outages' are only anticipated every eighteen months for approximately 6 weeks.

KcCPC is sure that other potential 'cost savings' could be realised from the list of Sizewell B facilities portrayed in 7.4.39, but despite the temptation, it is not minded to do the work for EDF Energy, although it hopes EDF Energy will look closely at the opportunities afforded by this paragraph!

KcCPC note that the descriptions in 7.4.39 are described as "Facilities to be applied for in detail". KcCPC does not regard the brief descriptions as, 'detailed' and hopes that SCDC and the Planning Inspectorate seek a significantly improved threshold when applications are formally made.

7.4.40 KcCPC note the content of the paragraph

KcCPC would have thought that in light of **items 6 and 7b at 7.3.2** (above) more potential 'cost savings' could have been realised from items in 7.4.39 and 7.4.40, but do recognise that EDF Energy may not wish to see savings realised from shared facilities irrespective of the cost and duplication within the EDF Energy Estate, where space is understood and portrayed as being at a premium?

**d) Remainder of the EDF Energy estate during the operational phase**

North of the power station at Goose Hill

7.4.41 KcCPC note the content of the paragraph and Figure 7.27

7.4.42 KcCPC note the content of the paragraph

KcCPC note the cynical comment that "A permanent two-lane access road continues to be proposed, with a segregated route for cyclists and pedestrians. The road width would be reduced following construction and designed to establish a corridor similar in character to a country road..." and compares this treatment with that being proposed for EDF's Sizewell Link road that destroys the 'real countryside' and damages country roads and lanes within a large radius!

This double standard, lays waste any remaining thoughts that EDF Energy's development at Sizewell C is, anything other than a: minimised cost, commercially expedient attempt to wring as much out of a beneficial strike price as possible, in order to tempt investors into an increasingly unpopular proposition.

7.4.43 KcCPC note the content of the paragraph and figure 7.17

KcCPC note that "The car park would be designed to accommodate around 1,335 spaces divided between permanent parking spaces for day-to-day operation (approximately 735) and spaces required during outage periods when the training facilities would be in use (approximately 600). and refer to comments at 7.4.39 above.

Seemingly, the drive to "**6. Cost** To ensure commercial viability the Sizewell C Project needs to achieve real cost savings associated with being the 'next of a kind', avoiding significant redesign without compromising overall design quality." does not extend to cars and the over provision of car parking.

7.4.44 KcCPC note the content of the paragraph

Training building

7.4.45 KcCPC note the content of the paragraph

7.4.46 KcCPC note the content of the paragraph

7.4.47 KcCPC note the content of the paragraph

7.4.48 KcCPC note the content of the paragraph

7.4.49 KcCPC note the content of the paragraph

7.4.50 KcCPC note the content of the paragraph

KcCPC note EDF Energy "have explored the possibility of sharing a training building with Sizewell B power station...However, the two power stations operate using different technologies and there is therefore minimal overlap in terms of common training facilities.", but would have thought the simple architectural challenge of a double wing facility with a common services central core not beyond most undergraduate architectural students.

7.4.51 KcCPC note the content of the paragraph

KcCPC note "a much larger training centre, leaving insufficient space for the laydown area. The training centre also needs to be next to the Sizewell C outage car park, as it is used for site inductions during outages." and think that perhaps a shared 'laydown area' and 'outage car park' would be the answer.

Perhaps EDF Energy should approach a few of the leading Schools of Architecture, as they often look for real commercial need when setting student assignments?

7.4.52 KcCPC note the content of the paragraph

See comments at 7.4.50 and 7.4.51 above.

KcCPC now understand that; as well as car parking spaces being exempt from potential 'cost saving measures', Training Centres are also seemingly exempt from rigorous review when seeking cost reductions.

SSSI Crossing

7.4.53 KcCPC note the content of the paragraph

7.4.54 KcCPC note the content of the paragraph

7.4.55 KcCPC note the content of the paragraph

7.4.56 KcCPC note the content of the paragraph and Table 7.4

7.4.57 KcCPC note the content of the paragraph

7.4.58 KcCPC note the content of the paragraph

7.4.59 KcCPC note the content of the paragraph and Figure 7.19

SSSI land and associated habitat

7.4.60 KcCPC note the content of the paragraph

7.4.61 KcCPC note the content of the paragraph

7.4.62 KcCPC note the content of the paragraph

7.4.63 KcCPC note the content of the paragraph

7.4.64 KcCPC note the content of the paragraph

7.4.65 KcCPC note the content of the paragraph

Movement of wildlife along the corridor

7.4.66 KcCPC note the content of the paragraph

Flood-risk

7.4.67 KcCPC note the content of the paragraph

7.4.68 KcCPC note the content of the paragraph

**East of the power station along the coast**

Northern mound

7.4.69 KcCPC note the content of the paragraph

7.4.70 KcCPC note the content of the paragraph

7.4.71 KcCPC note the content of the paragraph

KcCPC note that "We currently consider it unlikely that it will be strong enough and we will confirm this through ground testing prior to the submission of the application for development consent."

7.4.72 KcCPC note the content of the paragraph

7.4.73 KcCPC note the content of the paragraph

7.4.74 KcCPC note the content of the paragraph

7.4.75 KcCPC note the content of the paragraph

7.4.76 KcCPC note the content of the paragraph

7.4.77 KcCPC note the content of the paragraph

Sea defence

7.4.78 KcCPC note the content of the paragraph

7.4.79 KcCPC note the content of the paragraph

7.4.80 KcCPC note the content of the paragraph and Figures 7.21 and 7.22

7.4.81 KcCPC note the content of the paragraph

7.4.82 KcCPC note the content of the paragraph and Figure 7.23

7.4.83 KcCPC note the content of the paragraph

7.4.84 KcCPC note the content of the paragraph

**West of the power station towards Abbey Road (B1122)**

Emergency equipment store at Upper Abbey Farm

7.4.85 KcCPC note the content of the paragraph

7.4.86 KcCPC note the content of the paragraph

7.4.87 KcCPC note the content of the paragraph and Figure 7.24

Backup generator at Upper Abbey Farm

7.4.88 KcCPC note the content of the paragraph

7.4.89 KcCPC note the content of the paragraph

7.4.90 KcCPC note the content of the paragraph

7.4.91 KcCPC note the content of the paragraph

7.4.92 KcCPC note the content of the paragraph

7.4.93 KcCPC note the content of the paragraph

KcCPC note the intention to “retain the CHP plant and put it to continued use during the operational phase of the power station as a backup generator.” and wonder whether opportunities have been explored to exploit the capacity of the CHP plant for social benefit in the Leiston area, whilst simultaneously retaining it in a permanent state of readiness as a backup generator?

7.4.94 KcCPC note the content of the paragraph

7.4.95 KcCPC note the content of the paragraph

Electrical substation south of Upper Abbey Farm

7.4.96 KcCPC note the content of the paragraph

7.4.97 KcCPC note the content of the paragraph

7.4.98 KcCPC note the content of the paragraph

7.4.99 KcCPC note the content of the paragraph and Figure 7.26

**North of Sizewell Gap and south of Sandy Lane**

Helipad

7.4.100 KcCPC note the content of the paragraph

KcCPC note a reference to Figure 7.26, but understand this figure to be the substation at Upper Abbey Farm not a Helipad at Sizewell Gap

**Permanent masterplan**

7.4.101 KcCPC note the content of the paragraph

KcCPC note “The permanent proposals for the wider EDF Energy estate beyond those elements described above have not substantially altered from Stage 2, with a strategy for establishing extensive lowland heathland and new and enhanced woodland cover.” and anticipate this continuing through any subsequent application.

7.4.102 KcCPC note the content of the paragraph

7.4.103 KcCPC note the content of the paragraph

7.4.104 KcCPC note the content of the paragraph

Masterplan overview

7.4.105 KcCPC note the content of the paragraph

7.4.106 KcCPC note the content of the paragraph

Landscape strategy

7.4.107 KcCPC note the content of the paragraph

7.4.108 KcCPC note the content of the paragraph

**e) Parameters for the permanent development**

7.4.109 KcCPC note the content of the paragraph

KcCPC note with a degree of scepticism that "Sizewell C is a large and complex scheme that must conform to strict safety and regulatory requirements, which can change with best practice over time. Therefore, as we have learned at Hinkley Point C, designs that are at an advanced stage will still necessarily continue to evolve after the Government grants any development consent for the project." and once again are disturbed that EDF Energy have not brought forward any evidence from their 'Hinkley Point C' experience to demonstrate the issues leading it to have "designs that are at an advanced stage will still necessarily continue to evolve after the Government grants any development consent for the project."

7.4.110 KcCPC note the content of the paragraph

KcCPC note that EDF Energy intend "Applying for flexibility within parameters (known as the Rochdale Envelope) ..." and contend that without experiential evidence having been presented, this is potentially just another tactic to avoid scrutiny, rather than a pragmatic 'ask' borne on the basis of substantial and current evidence.

7.4.111 KcCPC note the content of the paragraph

See comments at 7.4.110 above

**f) Impact on Sizewell Marshes SSSI**

7.4.112 KcCPC note the content of the paragraph

KcCPC that the potential loss of 6.06ha of the SSSI (at Stage 2) has not been reduced by EDF Energy, yet simultaneously car park spaces abound, Training Centres grow and the thought of shared facilities (i.e. lay down, outage parking, etc.) seem unconscionable.

KcCPC perceive this as just another double standard, laying waste to any remaining thoughts that EDF Energy's development at Sizewell C is, anything other than a: minimised cost, commercially expedient attempt to wring as much out of a beneficial strike price as possible, in order to tempt investors into an increasingly unpopular proposition.

As commented by one Kelsale cum Carlton resident when referring to land in the Suffolk Coastal area, "They don't make it anymore"!

7.4.113 KcCPC note the content of the paragraph

Whilst KcCPC note the creation of habitats at Aldhurst Farm, it would remind EDF Energy that the first priority of a socially responsible development is 'avoidance', the second priority is 'mitigation' and only then should the issue of compensatory action be concerned.



KcCPC consider EDF Energy opining "Habitats within this area include wet woodland, reed beds, ditches and fen meadow. To provide compensation for this loss EDF Energy has developed a habitat creation scheme at Aldhurst Farm, which is upstream and contiguous with the Sizewell Marshes SSSI." as a very thin veil of convenience covering an abrogation of EDF Energy's environmental responsibilities when seeking a development order for Sizewell C.

7.4.114 KcCPC note the content of the paragraph

## 7.5 Construction phase

### a) Introduction

7.5.1 KcCPC note the content of the paragraph

7.5.2 KcCPC note the content of the paragraph and Figure 7.30

### b) Construction masterplan

7.5.3 KcCPC note the content of the paragraph

KcCPC note the requirement for "careful planning"

KcCPC is concerned that with the close proximity of so many ecological assets to the main development site, extra care is taken with the movement, fuelling and storing of machinery and special equipment.

KcCPC assume that all the workforce will be notified of their obligations in respect to the handling of machinery, fuels and other substances with the potential for endangering the environment in the Suffolk Coastal area?

KcCPC assume that that EDF have conducted a full risk and mitigation analysis and that as a consequence bunded storage and re-fuelling areas will be established appropriately, management of fuels (and other volatile liquids) will be stored and handled in accordance with the requisite provisions and that management oversight will be present at all transfer points.

Moreover, KcCPC assume that suitable equipped and trained environmental protection teams will be permanently stationed to take all necessary actions to minimise environmental impacts in the event of seepage, spillage and any other unmanaged release of fuels and other volatile liquids.

KcCPC believes that such important considerations should be integral to any application for a development order, and thereby subject to scrutiny and public inspection, as an integral part of any development order consideration.

7.5.4 KcCPC note the content of the paragraph

KcCPC note the regard EDF Energy have for:

- Locating construction activity liable to cause disturbance away from where people live
- Minimise land take from the Sizewell Marshes SSSI
- Avoiding the sensitive landscapes in the AONB
- Avoiding non-essential use of the foreshore
- Limiting disturbance to deciduous woodland, hedgerows and tree belts
- Minimising multiple movements of people, material, etc.
- Limiting disturbance to habitats (retain and new)
- Considering disturbance to European designated assets
- Maintaining access (i.e. recreation and amenity)
- The settings of key heritage assets

7.5.5 KcCPC note the content of the paragraph and Figures 7.31 and 7.32

**c) Construction phasing**

7.5.6 KcCPC note the content of the paragraph and Figure 7.33

7.5.7 KcCPC note the content of the paragraph

**Phase 1 – Site establishment and preparation for earthworks**

7.5.8 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.9 KcCPC note the content of the paragraph

7.5.10 KcCPC note the content of the paragraph

7.5.11 KcCPC note the content of the paragraph

7.5.12 KcCPC note the content of the paragraph

**Phase 2 – main site earthworks and completion of temporary infrastructure**

7.5.13 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.14 KcCPC note the content of the paragraph

7.5.15 KcCPC note the content of the paragraph

7.5.16 KcCPC note the content of the paragraph

7.5.17 KcCPC note the content of the paragraph

7.5.18 KcCPC note the content of the paragraph

7.5.19 KcCPC note the content of the paragraph

**Phase 3 – Main civils**

7.5.20 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use **from Day 1** to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.21 KcCPC note the content of the paragraph

**Phase 4 – Mechanical and electrical installation**

7.5.22 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use from Day 1 to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.23 KcCPC note the content of the paragraph

Phase 5 – commissioning and land restoration

7.5.24 KcCPC note the content of the paragraph

KcCPC would like to understand, given the sensitivity of the area surrounding the main construction site, what facilities will be in use from Day 1 to enable the workforce (in all locations) to dispose of human waste in a controlled and managed way and how this will be monitored.

7.5.25 KcCPC note the content of the paragraph

7.5.26 KcCPC note the content of the paragraph

**d) Power station platform (main platform)**

7.5.27 KcCPC note the content of the paragraph

7.5.28 KcCPC note the content of the paragraph

KcCPC note with regret that to establish the boundary of the main platform EDF Energy propose to:

- divert the Sizewell Drain within the Sizewell Marshes SSSI
- install a barrier between the retained SSSI area and the site, likely constructed of steel sheet piling
- undertake ground treatment and land raising within those areas removed from the SSSI

KcCPC is disappointed that such radical measures are necessary

7.5.29 KcCPC note the content of the paragraph

7.5.30 KcCPC note the content of the paragraph

KcCPC note that “...completion of the cut-off wall, the contained area would be dewatered...” and note that the method of dewatering is not identified. Is this because of the method being used and the potential threat to any residual wildlife?

7.5.31 KcCPC note the content of the paragraph

SSSI crossing during construction

7.5.32 KcCPC note the content of the paragraph and Figure 7.39

7.5.33 KcCPC note the content of the paragraph

7.5.34 KcCPC note the content of the paragraph

Construction programme

7.5.35 KcCPC note the content of the paragraph

KcCPC note that "...timing of the construction of the SSSI crossing to connect the main platform with the temporary construction area is crucial to the overall construction programme and therefore early delivery is a high priority for the project.", and "...Commencing the main earthworks in the first available summer is very important...", as a consequence it is concerned to ensure that independent verification of the diligence exercised during this delicate phase is ensured. Consequently, KcCPC seek clarity on the steps being taken by EDF Energy to mitigate all risks to the SSSI.

7.5.36 KcCPC note the content of the paragraph

KcCPC note that "...achieved by placing a temporary bridge across the Leiston Drain, supported on abutments for the permanent culvert structure at the east end, while the full construction remains ongoing at the west. By comparison the bridge options would result in approximately a six-month delay to the overall construction programme." and assumes that a full risk assessment has been made by EDF of pursuing this strategy and that all detrimental risks are fully mitigated. KcCPC respectfully request that EDF Energy make public the risk assessment and mitigations programme.

**e) Land east of Eastlands Industrial Estate, including Sizewell Halt**

7.5.37 KcCPC note the content of the paragraph

7.5.38 KcCPC note the content of the paragraph

7.5.39 KcCPC note the content of the paragraph

7.5.40 KcCPC note the content of the paragraph

KcCPC note that "...we have discounted the marine-maximised scenario and we are now consulting on a road-led strategy and a rail-led strategy." and would like to ascertain whether EDF Energy have considered a modern day 'Mulberry Harbour' approach to avoid/mitigate detrimental marine impacts?

7.5.41 KcCPC note the content of the paragraph and Table 7.6

7.5.42 KcCPC note the content of the paragraph

7.5.43 KcCPC note the content of the paragraph

7.5.44 KcCPC note the content of the paragraph

7.5.45 KcCPC note the content of the paragraph Table 7.7 and Table 7.8

7.5.46 KcCPC note the content of the paragraph

**f) East of Bridleway 19 and north of Sizewell Marshes SSSI**

Borrow pits and stockpiles

7.5.47 KcCPC note the content of the paragraph

7.5.48 KcCPC note the content of the paragraph

7.5.49 KcCPC note the content of the paragraph

7.5.50 KcCPC note the content of the paragraph

Stage 2 consultation feedback

7.5.51 KcCPC note the content of the paragraph

7.5.52 KcCPC note the content of the paragraph

7.5.53 KcCPC note the content of the paragraph

7.5.54 KcCPC note the content of the paragraph

7.5.55 KcCPC note the content of the paragraph

Proposed approach

7.5.56 KcCPC note the content of the paragraph

7.5.57 KcCPC note the content of the paragraph

7.5.58 KcCPC note the content of the paragraph

KcCPC is concerned that "...we now consider **on a precautionary basis** that the remaining three borrow pit fields should be included in the application for development consent to ensure that sufficient suitable material is available for the main platform." and respectfully suggest that good project management disciplines, strong logistics capabilities, combined with thorough and rigorous planning, would obviate the need for such a disproportionate contingency.

7.5.59 KcCPC note the content of the paragraph Figure 7.42 and Figure 7.43

Borrow pit and stockpile typical phasing

7.5.60 KcCPC note the content of the paragraph and Figure 7.44

Common user facilities and contractors' compounds

7.5.61 KcCPC note the content of the paragraph

7.5.62 KcCPC note the content of the paragraph

7.5.63 KcCPC note the content of the paragraph

Boundary treatments

7.5.64 KcCPC note the content of the paragraph

7.5.65 KcCPC note the content of the paragraph and Figure 7.45

7.5.66 KcCPC note the content of the paragraph and Figure 7.46

7.5.67 KcCPC note the content of the paragraph and Figure 7.47

**g) North of Sizewell Gap**

New electricity supply cable and substation

7.5.68 KcCPC note the content of the paragraph

7.5.69 KcCPC note the content of the paragraph and Figure 7.48

7.5.70 KcCPC note the content of the paragraph

**h) West of Bridleway 19 and east of Abbey Road**

Site entrance hub

7.5.71 KcCPC note the content of the paragraph

7.5.72 KcCPC note the content of the paragraph and Figure 7.49

7.5.73 KcCPC note the content of the paragraph

7.5.74 KcCPC note the content of the paragraph

7.5.75 KcCPC note the content of the paragraph

7.5.76 KcCPC note the content of the paragraph and Figure 7.49

7.5.77 KcCPC note the content of the paragraph

7.5.78 KcCPC note the content of the paragraph, Figure 7.31 and Figure 7.32

7.5.79 KcCPC note the content of the paragraph

**i) Suffolk coast**

Sea defences and rights of way

7.5.80 KcCPC note the content of the paragraph

7.5.81 KcCPC note the content of the paragraph and Figure 7.40

7.5.82 KcCPC note the content of the paragraph

7.5.83 KcCPC note the content of the paragraph

7.5.84 KcCPC note the content of the paragraph

7.5.85 KcCPC note the content of the paragraph

7.5.86 KcCPC note the content of the paragraph

7.5.87 KcCPC note the content of the paragraph

7.5.88 KcCPC note the content of the paragraph

7.5.89 KcCPC note the content of the paragraph

7.5.90 KcCPC note the content of the paragraph and Figure 7.50

Beach landing facility (BLF)

7.5.91 KcCPC note the content of the paragraph

Stage 2 consultation feedback

7.5.92 KcCPC note the content of the paragraph

7.5.93 KcCPC note the content of the paragraph

7.5.94 KcCPC note the content of the paragraph

Preferred approach

7.5.95 KcCPC note the content of the paragraph

7.5.96 KcCPC note the content of the paragraph

7.5.97 KcCPC note the content of the paragraph

7.5.98 KcCPC note the content of the paragraph

#### **j) Site-wide infrastructure**

7.5.99 KcCPC note the content of the paragraph

#### **Drainage**

Foul water drainage

7.5.100 KcCPC note the content of the paragraph

KcCPC note the intention of EDF Energy during the construction stage to treat all sewage through a dedicated sewage treatment plant located north of the Leiston drain, discharging to the sea via combined drainage outfall.

Given the proximity of sensitive sites and ecologically important assets, KcCPC is concerned that EDF Energy provide a totally sealed sewage handling system, that is under continual monitoring and subject to random checks by the statutory authorities.

7.5.101 KcCPC note the content of the paragraph

Surface water drainage

7.5.102 KcCPC note the content of the paragraph

7.5.103 KcCPC note the content of the paragraph

7.5.104 KcCPC note the content of the paragraph

Combined drainage outfall

7.5.105 KcCPC note the content of the paragraph and Figure 7.52

#### **Lighting**

7.5.106 KcCPC note the content of the paragraph

KcCPC note that the Hinkley Point C lighting 'glow dome' is readily visible 4 miles distant (as the crow flies) 8 miles distant (via the road route).

Consequently, KcCPC is persuaded that EDF Energy must include detailed lighting plans for the main site (at each discrete construction phase) and a lighting plan for the operational phase of the Sizewell C power station, within any application made for a development order at the EDF Energy Sizewell estate.

In addition, where night hour working is planned at other sites (i.e. FMF, road alteration sites and/or construction sites, etc.) KcCPC also judge it necessary that lighting plans are agreed (for both the construction and operational phases), with the statutory authorities and residents and/or businesses directly impacted.

7.5.107 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.108 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.109 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

7.5.110 KcCPC note the content of the paragraph

Refer to comments at 7.5.106

**Main site access road from B1122 to the main platform**

7.5.111 KcCPC note the content of the paragraph

7.5.112 KcCPC note the content of the paragraph

**Haul roads**

7.5.113 KcCPC note the content of the paragraph

7.5.114 KcCPC note the content of the paragraph

KcCPC note "haul roads need to safely accommodate the movement of the largest excavation haulage vehicles known as CAT 777s, typically 6.5m wide. The haul roads need to be approximately 30m wide in total, including safety bunds and drainage ditches."

**Service roads**

7.5.115 KcCPC note the content of the paragraph

**k) Parameters during the construction phase**

7.5.116 KcCPC note the content of the paragraph

KcCPC note that EDF Energy intend "Applying for flexibility within parameters (known as the Rochdale Envelope) ..." and contend that without experiential evidence having been presented, this is potentially just another tactic to avoid scrutiny, rather than a pragmatic 'ask' borne on the basis of substantial and current evidence.

7.5.117 KcCPC note the content of the paragraph

**l) Temporary impact on Sizewell Marshes SSSI**

7.5.118 KcCPC note the content of the paragraph



**Works associated with the main platform and SSSI crossing**

7.5.119 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

**National Grid works**

7.5.120 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of National Grid (conducting work in connection with the Sizewell C development) into the SSSI

**Works associated with the temporary construction area**

7.5.121 KcCPC note the content of the paragraph and Figure 7.29

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

7.5.122 KcCPC note the content of the paragraph

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

7.5.123 KcCPC note the content of the paragraph

7.5.124 KcCPC note the content of the paragraph and Figure 7.29

KcCPC note with concern another intended incursion of the Sizewell C development into the SSSI

**7.6 Accommodation Campus**

**a) Introduction**

7.6.1 KcCPC note the content of the paragraph

7.6.2 KcCPC note the content of the paragraph

7.6.3 KcCPC note the content of the paragraph

7.6.4 KcCPC note the content of the paragraph

7.6.5 KcCPC note the content of the paragraph and Figure 7.53

7.6.6 KcCPC note the content of the paragraph and Figure 7.55

**b) Site requirements**

7.6.7 KcCPC note the content of the paragraph

**c) Overview of Stage 2 feedback and response to consultation**

7.6.8 KcCPC note the content of the paragraph

7.6.9 KcCPC note the content of the paragraph

7.6.10 KcCPC note the content of the paragraph

7.6.11 KcCPC note the content of the paragraph

7.6.12 KcCPC note the content of the paragraph and Table 7.9

**d) Site description and proposed development**

7.6.13 KcCPC note the content of the paragraph

7.6.14 KcCPC note the content of the paragraph Figure 7.53 and Figure 7.54

7.6.15 KcCPC note the content of the paragraph

7.6.16 KcCPC note the content of the paragraph

7.6.17 KcCPC note the content of the paragraph

7.6.18 KcCPC note the content of the paragraph and Figure 7.55

7.6.19 KcCPC note the content of the paragraph, Figure 7.56, Figure 7.57 and Figure 7.58

**8. Rail (Volume 1, Pages 240 to 260)**

**8.1 Introduction**

8.1.1 KcCPC note the content of the paragraph

**a) Stage 2 consultation**

8.1.2 KcCPC note the content of the paragraph

8.1.3 KcCPC note the content of the paragraph

8.1.4 KcCPC note the content of the paragraph

**b) Stage 3 consultation**

8.1.5 KcCPC note the content of the paragraph

8.1.6 KcCPC note the content of the paragraph

8.1.7 KcCPC note the content of the paragraph

8.1.8 KcCPC note the content of the paragraph

8.1.9 KcCPC note the content of the paragraph

8.1.10 KcCPC note the content of the paragraph

8.1.11 KcCPC note the content of the paragraph and Table 8.1

**8.2 Summary of rail proposals (rail-led strategy)**

**a) Early years**

8.2.1 KcCPC note the content of the paragraph

8.2.2 KcCPC note the content of the paragraph

**b) Main construction phase**

8.2.3 KcCPC note the content of the paragraph

8.2.4 KcCPC note the content of the paragraph

**c) Other rail improvements**

8.2.5 KcCPC note the content of the paragraph

8.2.6 KcCPC note the content of the paragraph and Figure 8.1

**d) Post-operation**

8.2.7 KcCPC note the content of the paragraph

8.2.8 KcCPC note the content of the paragraph

8.2.9 KcCPC note the content of the paragraph

**8.3 Sizewell Halt or new siding (rail-led strategy)**

**a) Option 1: Sizewell Halt**

- 8.3.1 KcCPC note the content of the paragraph
- 8.3.2 KcCPC note the content of the paragraph
- 8.3.3 KcCPC note the content of the paragraph
- 8.3.4 KcCPC note the content of the paragraph
- 8.3.5 KcCPC note the content of the paragraph
- 8.3.6 KcCPC note the content of the paragraph and Figure 8.2
- 8.3.7 KcCPC note the content of the paragraph and Figure 8.3
- 8.3.8 KcCPC note the content of the paragraph and Figure 8.3
- 8.3.9 KcCPC note the content of the paragraph

**b) Option 2: New rail siding**

- 8.3.10 KcCPC note the content of the paragraph
- 8.3.11 KcCPC note the content of the paragraph
- 8.3.12 KcCPC note the content of the paragraph
- 8.3.13 KcCPC note the content of the paragraph
- 8.3.14 KcCPC note the content of the paragraph
- 8.3.15 KcCPC note the content of the paragraph

**8.4 Green rail route (rail-led strategy)**

**a) Consultation response and rationale for selection**

- 8.4.1 KcCPC note the content of the paragraph
- 8.4.2 KcCPC note the content of the paragraph
- 8.4.3 KcCPC note the content of the paragraph
- 8.4.4 KcCPC note the content of the paragraph

**b) Site description**

- 8.4.5 KcCPC note the content of the paragraph
- 8.4.6 KcCPC note the content of the paragraph and Figure 8.5
- 8.4.7 KcCPC note the content of the paragraph
- 8.4.8 KcCPC note the content of the paragraph

8.4.9 KcCPC note the content of the paragraph

8.4.10 KcCPC note the content of the paragraph

8.4.11 KcCPC note the content of the paragraph

**c) Proposals**

8.4.12 KcCPC note the content of the paragraph, Figure 8.6 and Figure 8.7

8.4.13 KcCPC note the content of the paragraph

Saxmundham Road to Buckleswood Road

8.4.14 KcCPC note the content of the paragraph

8.4.15 KcCPC note the content of the paragraph

8.4.16 KcCPC note the content of the paragraph

8.4.17 KcCPC note the content of the paragraph

8.4.18 KcCPC note the content of the paragraph

8.4.19 KcCPC note the content of the paragraph and Figure 8.6

8.4.20 KcCPC note the content of the paragraph and Figure 8.7

8.4.21 KcCPC note the content of the paragraph

Buckleswood Road to the B1122 (Abbey Road)

8.4.22 KcCPC note the content of the paragraph

8.4.23 KcCPC note the content of the paragraph and Figure 8.8

8.4.24 KcCPC note the content of the paragraph

8.4.25 KcCPC note the content of the paragraph

8.4.26 KcCPC note the content of the paragraph

8.4.27 KcCPC note the content of the paragraph

8.4.28 KcCPC note the content of the paragraph

8.4.29 KcCPC note the content of the paragraph

8.4.30 KcCPC note the content of the paragraph and Figure 8.6

8.4.31 KcCPC note the content of the paragraph

8.4.32 KcCPC note the content of the paragraph

B1122 (Abbey Road) to the main development site

8.4.33 KcCPC note the content of the paragraph

8.4.34 KcCPC note the content of the paragraph

**d) Construction and operational considerations**

8.4.35 KcCPC note the content of the paragraph

8.4.36 KcCPC note the content of the paragraph

KcCPC note the maximum permissible speed is 25mph

8.4.37 KcCPC note the content of the paragraph and Figure 8.6

## **8.5 Upgrades to the East Suffolk line (rail-led strategy)**

8.5.1 KcCPC note the content of the paragraph

8.5.2 KcCPC note the content of the paragraph

8.5.3 KcCPC note the content of the paragraph

KcCPC is very supportive of a rail-led strategy, but believes there is tremendous potential for a more ambitious approach than the Stage 3 proposals, based on heavier investment in enduring infrastructure, utilisation of night time movements, increased rail-head infrastructure at Leiston and broader discussions with both the rail operator (Greater Anglia) and Railtrack.

For example, have EDF Energy examined options with Greater Anglia including;

- Providing a southbound return shuttle train service between Lowestoft and Darsham
- Providing direct southbound travel via 'express' bus services between Darsham and stations to Ipswich
- Providing direct northbound travel 'express' bus services between Ipswich and all stations including Saxmundham to Darsham to pick up the northbound trains

A pedestrian link to Darsham Park and Ride could avoid congestion at Darsham station with turnaround buses.

Direct services from and to Darsham would avoid the problems associated with multi-drop 'rail replacement services'.

The size of buses providing services could be flexed to reflect destination demand, combined with service capacity at different times of the day (i.e. minibus, compact coach, coach and double decked buses).

KcCPC recognise that there would be an impact on average journey times, but believes correctly run these impacts could be minimised, whilst maintaining a valuable service up and down the Suffolk Coastal route.

In essence, this type of strategy could release the Ipswich to Saxmundham track for further investment and use as a short to medium rail based 'materials artery' directly to the Sizewell main site and Sizewell Halt.

In suggesting this sort of approach, KcCPC understand they are open to criticism.

However, KcCPC believes that this type of thinking and open-mindedness is the only way to avoid the inevitable road crisis that will occur should; a Sizewell C road-led strategy, or even the currently proposed rail-led strategy be pursued.

KcCPC is mindful that a 'perfect storm' is building along the A14/A12 routes comprising:

- Sizewell C construction
- Increased signalisation of the A12
- Increasing Capacity/Volume A14 congestion

- SCDC's Local Plan 10,000 house building programme including Brightwell Lakes and Felixstowe and Saxmundham Garden Village initiatives
- Scottish Power Renewables Schemes (x4)
- SCDC's ambition for 'year round' tourism
- Increased commutes from SCDC Local Plan delivered housing to Martlesham, Ipswich & Felixstowe
- Traditional activity driven Felixstowe Port development
- The new RORO Felixstowe Port Developments

It is unconscionable to pursue individual strands of this outlook, without stepping back and examining the collective short and medium-term threats that they pose to; the environment, businesses, residents, visitors, and the health of individuals.

In the long term, KcCPC can visualise lasting damage being sustained to; infrastructure, flora, fauna and public health that may takes tens of years, if ever, to fully recover from.

Consequently, however unpopular, KcCPC feel it is incumbent on them to suggest what may currently viewed as unthinkable.

8.5.4 KcCPC note the content of the paragraph

8.5.5 KcCPC note the content of the paragraph

**a) Passing loop**

8.5.6 KcCPC note the content of the paragraph

8.5.7 KcCPC note the content of the paragraph

8.5.8 KcCPC note the content of the paragraph

8.5.9 KcCPC note the content of the paragraph and Figure 8.9

**b) Saxmundham crossover**

8.5.10 KcCPC note the content of the paragraph and Figure 8.10

8.5.11 KcCPC note the content of the paragraph

8.5.12 KcCPC note the content of the paragraph and Figure 8.10

**c) Signalling**

8.5.13 KcCPC note the content of the paragraph

**d) Level Crossings**

8.5.14 KcCPC note the content of the paragraph

KcCPC note the increase in freight train speed to 40mph

8.5.15 KcCPC note the content of the paragraph

**e) Bridge strengthening**

8.5.16 KcCPC note the content of the paragraph

**8.6 Upgrades to the Saxmundham to Leiston branch line (rail-led strategy)**

8.6.1 KcCPC note the content of the paragraph

**a) Track repairs or replacement**

8.6.2 KcCPC note the content of the paragraph

8.6.3 KcCPC note the content of the paragraph

**b) Level crossings**

8.6.4 KcCPC note the content of the paragraph

8.6.5 KcCPC note the content of the paragraph

**8.7 Rail works required for a road-led strategy**

**a) Option 1: Sizewell Halt (road-led strategy)**

8.7.1 KcCPC note the content of the paragraph

**b) Option 2: New rail siding on land east of the Eastlands Industrial Estate (road-led strategy)**

8.7.2 KcCPC note the content of the paragraph

**c) Upgrades to the East Suffolk line (road-led strategy)**

8.7.3 KcCPC note the content of the paragraph

8.7.4 KcCPC note the content of the paragraph

8.7.5 KcCPC note the content of the paragraph

**d) Upgrades to the Saxmundham to Leiston branch line (road-led strategy)**

8.7.6 KcCPC note the content of the paragraph

8.7.7 KcCPC note the content of the paragraph

**e) Post-operation (road-led strategy)**

8.7.8 KcCPC note the content of the paragraph

8.7.9 KcCPC note the content of the paragraph

**8.8 Consenting strategy**

8.8.1 KcCPC note the content of the paragraph and Table 8.1

8.8.2 KcCPC note the content of the paragraph

8.8.3 KcCPC note the content of the paragraph



## **9 Level Crossings (Volume 1, Pages 261 to 310)**

### **9.1 Introduction**

9.1.1 KcCPC note the content of the paragraph

9.1.2 KcCPC note the content of the paragraph

9.1.3 KcCPC note the content of the paragraph

9.1.4 KcCPC note the content of the paragraph

### **9.2 Types of level crossing**

9.2.1 KcCPC note the content of the paragraph and Table 9.1

### **9.3 Level crossing works required for a rail-led strategy**

9.3.1 KcCPC note the content of the paragraph

9.3.2 KcCPC note the content of the paragraph and Table 9.2

9.3.3 KcCPC note the content of the paragraph

#### **a) East Suffolk line**

9.3.4 KcCPC note the content of the paragraph

9.3.5 KcCPC note the content of the paragraph

#### **b) Proposed closures along the East Suffolk line**

9.3.6 KcCPC note the content of the paragraph

9.3.7 KcCPC note the content of the paragraph

Westerfield Footpath

9.3.8 KcCPC note the content of the paragraph and Figure 9.1

9.3.9 KcCPC note the content of the paragraph

Diversion Option 1

9.3.10 KcCPC note the content of the paragraph and Figure 9.2

Diversion Option 2

9.3.11 KcCPC note the content of the paragraph and Figure 9.3

Diversion Option 3

9.3.12 KcCPC note the content of the paragraph and Figure 9.4

Lacy's Footpath

9.3.13 KcCPC note the content of the paragraph and Figure 9.5

- 9.3.14 KcCPC note the content of the paragraph and Figure 9.6  
Stennetts 1
- 9.3.15 KcCPC note the content of the paragraph and Figure 9.7
- 9.3.16 KcCPC note the content of the paragraph and Figure 9.8  
Stennetts 2
- 9.3.17 KcCPC note the content of the paragraph and Figure 9.9
- 9.3.18 KcCPC note the content of the paragraph  
Diversion Option 1
- 9.3.19 KcCPC note the content of the paragraph and Figure 9.10  
Diversion Option 2
- 9.3.20 KcCPC note the content of the paragraph and Figure 9.11  
Diversion Option 3
- 9.3.21 KcCPC note the content of the paragraph and Figure 9.12  
Gamekeepers
- 9.3.22 KcCPC note the content of the paragraph and Figure 9.13
- 9.3.23 KcCPC note the content of the paragraph and Figure 9.14  
Martlesham
- 9.3.24 KcCPC note the content of the paragraph and Figure 9.15
- 9.3.25 KcCPC note the content of the paragraph  
Diversion Option 1
- 9.3.26 KcCPC note the content of the paragraph and Figure 9.16  
Diversion Option 2
- 9.3.27 KcCPC note the content of the paragraph and Figure 9.17  
Melton Bromswell
- 9.3.28 KcCPC note the content of the paragraph and Figure 9.18
- 9.3.29 KcCPC note the content of the paragraph  
Diversion Option 1
- 9.3.30 KcCPC note the content of the paragraph and Figure 9.19

Diversion Option 2

9.3.31 KcCPC note the content of the paragraph and Figure 9.20

Diversion Option 3

9.3.32 KcCPC note the content of the paragraph and Figure 9.21

Diversion Option 4

9.3.33 KcCPC note the content of the paragraph and Figure 9.22

Diversion Option 5

9.3.34 KcCPC note the content of the paragraph and Figure 9.23

9.3.35 KcCPC note the content of the paragraph

Pettistree

9.3.36 KcCPC note the content of the paragraph and Figure 9.24

9.3.37 KcCPC note the content of the paragraph

Diversion Option 1

9.3.38 KcCPC note the content of the paragraph and Figure 9.25

Diversion Option 2

9.3.39 KcCPC note the content of the paragraph and Figure 9.26

Orchard

9.3.40 KcCPC note the content of the paragraph and Figure 9.27

9.3.41 KcCPC note the content of the paragraph and Figure 9.28

Wickham Market

9.3.42 KcCPC note the content of the paragraph and Figure 9.29

9.3.43 KcCPC note the content of the paragraph

Diversion Option 1

9.3.44 KcCPC note the content of the paragraph and Figure 9.30

Diversion Option 2

9.3.45 KcCPC note the content of the paragraph and Figure 9.31

Blaxhall 2

9.3.46 KcCPC note the content of the paragraph and Figure 9.32

9.3.47 KcCPC note the content of the paragraph

Diversion Option 1

9.3.48 KcCPC note the content of the paragraph and Figure 9.33

Diversion Option 2

9.3.49 KcCPC note the content of the paragraph and Figure 9.34

Saxmundham

9.3.50 KcCPC note the content of the paragraph and Figure 9.35

9.3.51 KcCPC note the content of the paragraph and Figure 9.36

c) Upgrades along the East Suffolk line

9.3.52 KcCPC note the content of the paragraph

9.3.53 KcCPC note the content of the paragraph

9.3.54 KcCPC note the content of the paragraph

Westerfield

9.3.55 KcCPC note the content of the paragraph and Figure 9.37

9.3.56 KcCPC note the content of the paragraph

9.3.57 KcCPC note the content of the paragraph and Figure 9.38

Bealings

9.3.58 KcCPC note the content of the paragraph and Figure 9.39

9.3.59 KcCPC note the content of the paragraph and Figure 9.40

Ferry Quay

9.3.60 KcCPC note the content of the paragraph and Figure 9.41

9.3.61 KcCPC note the content of the paragraph

9.3.62 KcCPC note the content of the paragraph and Figure 9.42

Haywards/Tide Mill Way

9.3.63 KcCPC note the content of the paragraph and Figure 9.43

9.3.64 KcCPC note the content of the paragraph

9.3.65 KcCPC note the content of the paragraph and Figure 9.44

Lime Kiln Quay and Sun Wharf

9.3.66 KcCPC note the content of the paragraph and Figure 9.45 and Figure 9.46

9.3.67 KcCPC note the content of the paragraph

- 9.3.68 KcCPC note the content of the paragraph and Figure 9.47
- Melton Station
- 9.3.69 KcCPC note the content of the paragraph and Figure 9.48
- 9.3.70 KcCPC note the content of the paragraph
- 9.3.71 KcCPC note the content of the paragraph and Figure 9.49
- Ufford
- 9.3.72 KcCPC note the content of the paragraph and Figure 9.50
- 9.3.73 KcCPC note the content of the paragraph
- 9.3.74 KcCPC note the content of the paragraph and Figure 9.51
- Blaxhall 1
- 9.3.75 KcCPC note the content of the paragraph and Figure 9.52
- 9.3.76 KcCPC note the content of the paragraph
- 9.3.77 KcCPC note the content of the paragraph and Figure 9.53
- Beversham
- 9.3.78 KcCPC note the content of the paragraph and Figure 9.54
- 9.3.79 KcCPC note the content of the paragraph
- 9.3.80 KcCPC note the content of the paragraph and Figure 9.55
- d) Miniature stop light upgrades along the East Suffolk line
- 9.3.81 KcCPC note the content of the paragraph
- 9.3.82 KcCPC note the content of the paragraph
- 9.3.83 KcCPC note the content of the paragraph
- Lox Farm
- 9.3.84 KcCPC note the content of the paragraph and Figure 9.56
- Notcutts Nursery
- 9.3.85 KcCPC note the content of the paragraph and Figure 9.57
- Kingston Farm
- 9.3.86 KcCPC note the content of the paragraph and Figure 9.58
- Jetty Avenue
- 9.3.87 KcCPC note the content of the paragraph and Figure 9.59

- 9.3.88 KcCPC note the content of the paragraph and Figure 9.60  
Maltings
- 9.3.89 KcCPC note the content of the paragraph and Figure 9.61
- 9.3.90 KcCPC note the content of the paragraph and Figure 9.62  
Melton Sewage
- 9.3.91 KcCPC note the content of the paragraph and Figure 9.63  
Dock Lane
- 9.3.92 KcCPC note the content of the paragraph and Figure 9.64  
Bloss
- 9.3.93 KcCPC note the content of the paragraph and Figure 9.65
- 9.3.94 KcCPC note the content of the paragraph and Figure 9.66  
Ellingers
- 9.3.95 KcCPC note the content of the paragraph and Figure 9.67  
Uffold
- 9.3.96 KcCPC note the content of the paragraph and Figure 9.68  
Blackstock
- 9.3.97 KcCPC note the content of the paragraph and Figure 9.69  
Red House Farm
- 9.3.98 KcCPC note the content of the paragraph and Figure 9.70  
Snape
- 9.3.99 KcCPC note the content of the paragraph and Figure 9.71  
Farnham
- 9.3.100 KcCPC note the content of the paragraph and Figure 9.72  
Benhall/Grays Lane
- 9.3.101 KcCPC note the content of the paragraph and Figure 9.73
- 9.3.102 KcCPC note the content of the paragraph  
Brick Kiln
- 9.3.103 KcCPC note the content of the paragraph and Figure 9.74
- 9.3.104 KcCPC note the content of the paragraph and Figure 9.75

**e) Upgrades along the Saxmundham to Leiston branch line**

9.3.105 KcCPC note the content of the paragraph

9.3.106 KcCPC note the content of the paragraph and Table 9.3

9.3.107 KcCPC note the content of the paragraph and Figure 9.76

9.3.108 KcCPC note the content of the paragraph

Knodishall

9.3.109 KcCPC note the content of the paragraph and Figure 9.77

West House

9.3.110 KcCPC note the content of the paragraph and Figure 9.78

9.3.111 KcCPC note the content of the paragraph

9.3.112 KcCPC note the content of the paragraph and Figure 9.79

Saxmundham Road

9.3.113 KcCPC note the content of the paragraph and Figure 9.80

9.3.114 KcCPC note the content of the paragraph

9.3.115 KcCPC note the content of the paragraph and Figure 9.81

Leiston

9.3.116 KcCPC note the content of the paragraph and Figure 9.82

9.3.117 KcCPC note the content of the paragraph

9.3.118 KcCPC note the content of the paragraph and Figure 9.83

Sizewell

9.3.119 KcCPC note the content of the paragraph and Figure 9.84

9.3.120 KcCPC note the content of the paragraph

KcCPC note an incorrect reference to "Due to the wide carriageway and adjacent road of Westward Ho, three..."

9.3.121 KcCPC note the content of the paragraph and Figure 9.85

**f) Miniature stop light upgrades along the Saxmundham to Leiston branch line**

9.3.122 KcCPC note the content of the paragraph

9.3.123 KcCPC note the content of the paragraph

9.3.124 KcCPC note the content of the paragraph

Bratts Black House

9.3.125 KcCPC note the content of the paragraph and Figure 9.86

Snowdens

9.3.126 KcCPC note the content of the paragraph and Figure 9.87

Buckles Wood

9.3.127 KcCPC note the content of the paragraph and Figure 9.88

Summerhill

9.3.128 KcCPC note the content of the paragraph and Figure 9.89

#### **9.4 Level crossing works required for a road-led strategy**

##### **a) Upgrades to the East Suffolk line**

9.4.1 KcCPC note the content of the paragraph

9.4.2 KcCPC note the content of the paragraph

9.4.3 KcCPC note the content of the paragraph

##### **b) Upgrades to the Saxmundham to Leiston branch line**

9.4.4 KcCPC note the content of the paragraph

9.4.5 KcCPC note the content of the paragraph and Table 9.4

#### **9.5 Primary Construction Compounds**

9.5.1 KcCPC note the content of the paragraph

9.5.2 KcCPC note the content of the paragraph

##### **a) Westerfield Station primary compound**

9.5.3 KcCPC note the content of the paragraph and Figure 9.90

9.5.4 KcCPC note the content of the paragraph

9.5.5 KcCPC note the content of the paragraph

##### **b) Passing loop primary compound**

9.5.6 KcCPC note the content of the paragraph and Figure 9.91

9.5.7 KcCPC note the content of the paragraph

##### **c) Saxmundham Crossover primary compound**

9.5.8 KcCPC note the content of the paragraph and Figure 9.92

9.5.9 KcCPC note the content of the paragraph



## 10 Sizewell Link Road (Volume 1, Pages 311 to 323)

### 10.1 Introduction

#### 10.1.1 KcCPC note the content of the paragraph

KcCPC is concerned that EDF Energy's proposed Sizewell Link road comes as a very late, ill-conceived addition to a fundamentally unsound road-led proposal, that is not sustainable.

There are five principal themes that lead KcCPC to this conclusion:

- a] Sizewell C is not happening in 'a vacuum' and cumulative impacts cannot be ignored or dismissed
- b] Small 'mitigation schemes' do not address the fundamental deficiencies of the A12
- c] Traffic modelling (where clear and discernible) does not appear to reflect the observed realities of the A12
- d] Suffolk Coastal residents must be able to 'live and flourish', not just 'survive' any Sizewell C construction
- e] The Suffolk Coastal economy is highly dependent on tourism (6.3 million tourist trips in 2017) ...

KcCPC build on these themes throughout their.

#### 10.1.2 KcCPC note the content of the paragraph

KcCPC note that EDF Energy assert that "Under the road-led strategy, we estimate that there would be an average of 375 Heavy Goods Vehicle (HGV) movements per day..." contrary to elsewhere in the Stage 3 Consultation (i.e. Table 6.1 – Line 8) where it is clearly stated:

Typical day – average number of HGVs  
per day at peak construction

Rail-led 450 movements (225 deliveries)

**Road-led 750 movements (375 deliveries)**

KcCPC note throughout the Stage 3 consultation documents, EDF Energy use 'vehicles', 'movements' and 'deliveries', in some places as though they are interchangeable when they clearly are not.

These errors (or misinformation?) have made it very difficult for the reader to take tables and narrative at 'face value' as there is a high degree of checking necessary to ascertain what is being indicated.

KcCPC note that "...councils at Yoxford, Theberton and Middleton-cum-Fordley, together with the Theberton and Eastbridge Action Group on Sizewell, were strongly opposed at Stage 2 to using the B1122 as..." and also note, EDF Energy do not develop the views expressed by these Councils or the alternatives strategies that were brought forward.

KcCPC also note that EDF Energy recognise "that the environmental impacts from, in particular, noise, vibration and severance from the Sizewell C traffic would require mitigation under the road-led strategy." and that "...the B1122 is not close to its traffic carrying capacity."

#### 10.1.3 KcCPC note the content of the paragraph

KcCPC is absolutely clear that the Sizewell Link proposal coming forward from EDF Energy at Stage 3 is totally unacceptable. It is not thought through, puts valuable, good quality agricultural land under tarmac, destroys wildlife habitats, only to complete the encircling of the communities that, EDF Energy claim to be helping.

Moreover, it comes at the end of a tortuous 30-mile journey (Figure 1), from either of proposed Freight Management Facilities, on or adjacent to the A14 east of the A12 junction.

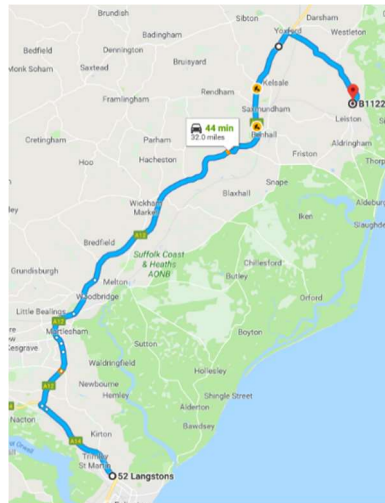


Figure 1

The soundness of any proposal to take such an enormous HGV burden, so far north, for such a protracted period of time has to be called into question when considered alone, but fold in the other considerations and the absurdity becomes self-evident. KcCPC will explore some of the other considerations in due course.

#### 10.1.4 KcCPC note the content of the paragraph

KcCPC is puzzled as to why no rationale has been given for the siting of the proposed westerly roundabout (giving access to EDF Energy's proposed Sizewell Link road), at the highest point of the A12 between Kelsale cum Carlton and Yoxford.

Moreover, it notes that as positioned, it is designed to detrimentally impact the northern boundary of Kelsale cum Carlton Parish, a rural area rich with wildlife habitats, ecological assets, small businesses and good, productive agricultural land.

KcCPC also note that pre-publication of the Stage 3 consultation, EDF Energy did not engage with either the Parish Council or those residents of Kelsale Cum Carlton directly impacted. Indeed, it appears that EDF Energy's agents may have misled some Kelsale cum Carlton residents in obtaining data from them for a 'subsequent mailing', whilst others were not contacted, before or after publication.

#### 10.1.5 KcCPC note the content of the paragraph

KcCPC note the EDF Energy intention to move (on a daily basis):

- 85% of HGV 'deliveries' north on the A12 from a Freight Management Facility adjoining or adjacent to the A14
- presumably route HGV 'returns' via the direction of origin (although not clear in the Stage 3 documents?)
- 80+ Mail Consolidation LGV movements north on the A12 from Wickham Market P&R
- 80+ Mail Consolidation LGV movements south on the A12 to Wickham Market P&R
- 500+ LGV movements with unclear routing
- 250 + bus movements to and from the Southern Park and Ride at Wickham Market
- an unquantified number of workforce cars routing to Wickham Market P&R or Darsham P&R or Sizewell C Main site and/or campus/campsite

Consequently, whilst it is self-evident the proposed EDF Energy Sizewell Link road would "...substantially reduce traffic flow through the village of Yoxford.", it is the contention of KcCPC that the inability of EDF

Energy to tackle more fundamental issues of an A12 based route, means in excess of 15,000 unnecessary miles (mostly diesel fuelled) will be undertaken each day.

**10.1.6** KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion regarding the potential benefit to villages on the B1122, but point out that the proposed route of the EDF Energy Sizewell Link road would effectively mean much of the housing on or close to the B1122 would have vehicles passing to the north (B1122) and to the south (EDG Energy Sizewell Link road).

**10.1.7** KcCPC note the content of the paragraph

KcCPC note the EDF Energy assertion that "...construction of the Sizewell link road under the road-led strategy would substantially reduce traffic volumes passing through Yoxford, Middleton Moor and Theberton, resulting in the reduction in noise, vibration and severance impacts. This would provide a major and permanent legacy benefit..." but point out that from the A12 north of Yoxford a not in considerable volume of traffic would continue flow (and presumably return), comprising a minimum of 15% of total HGV traffic, self-routing LGV traffic, Park and Ride buses and workforce traffic.

**10.1.8** KcCPC note the content of the paragraph

**10.2 Scheme requirements**

**10.2.1** KcCPC note the content of the paragraph

KcCPC understand the rationale behind the claim made by EDF Energy regarding driver behaviour and "...an important factor in encouraging the use of the Sizewell link road is that drivers generally choose routes to their destination which minimise their journey time. Therefore, the most sustainable solution to relieve the B1122 of Sizewell C construction traffic would be for the route of any new link road from the A12 to be as short as is practical.". However, the shortest physical route may not be the quickest, as EDF Energy identify when make comment on the degree of self-routing likely to occur on the southern end of the A12 near Woodbridge.

KcCPC understand this behaviour may be occasioned by the increase in the relatively slow moving Sizewell C HGV traffic, something that could also apply in the case of the EDF Energy Sizewell Link road and the B1122 routes.

**10.2.2** KcCPC note the content of the paragraph

KcCPC take issue with the contention that "The new link road must therefore start at the A12, between Yoxford and south of Saxmundham, and end on the B1122 east of Theberton, close to the main construction site entrance. It needs to provide relief to Yoxford, Middleton Moor and Theberton..." as this is not a binary decision.

As pointed out earlier in this response, the fundamental issues of a Sizewell C construction route utilising the A12 along most of its length, are far more onerous than those implied by the simplistic approach being taken by EDF Energy.

The A12 is not a trunk road, having been previously de-trunked. It is the only direct link along the East coast of Suffolk between Felixstowe and Ipswich in the south and Lowestoft in the north.

Moreover, it is the eastern most 'core' bearer of cross county traffic, with much of the traffic linking to 'west of A12' locations via short link journeys on the A12, and vice versa for traffic to 'east of A12' locations. It is also the primary access point for access to Norwich and via the A47 Lincolnshire and beyond.

However, as is self-evident, it still comprises significant stretches of historic single carriageway with little or no passing opportunities.

The surrounding road network to the A12 (especially north of Woodbridge), despite the contention of EDF Energy, is not well suited to self-routing and because of seasonally driven use by tourist and agricultural traffic, can be subject to 'snap congestion' events, leading to short/medium duration tailbacks and a shortage of safe overtaking. KcCPC also note that, much of the surrounding road network rapidly decays from A road, to B road to single track roads with limited passing, thereby making alternative HGV routing complex and dangerous.

In that connection, whilst KcCPC welcome a Traffic Incident Management Area at Wickham Market, it believes that the anatomy of the A12 is such that this provision is totally inadequate, and will need to be replicated elsewhere along the A12 route as accessibility will become a critical issue and one already observed as being severe in some cases.

KcCPC note and welcome the involvement of the Suffolk Constabulary and the East of England Ambulance service in discussions on the A12 and dealing with some incident type. However, KcCPC is unclear whether this involvement has been extended to the Fire Service and the Coastguard as they too have need to use the A12 on occasion.

As a result of these and other concerns, KcCPC have compiled a list of regular and irregular events observed on the A12, that will (statistically at least) or may occur during the construction of Sizewell C. It includes:

- Planned Highways carriageway closure (single carriageway)
- Planned Highways carriageway closure (dual carriageway)
- Unplanned Highways carriageway closure (single carriageway)
- Unplanned Highways carriageway closure (dual carriageway)
- Scheduled dustbin collections (Single carriageway)
- Emergency Services – ceding priority (Single carriageway)
- Scheduled utility access to carriageway (Single carriageway)
- Scheduled utility access to carriageway (Dual carriageway)
- Emergency utility access to carriageway (Single carriageway)
- Emergency utility access to carriageway (Dual carriageway)
- HGV tyre loss (Single Carriageway)
- HGV tyre loss (Dual Carriageway)
- HGV breakdown (Single Carriageway)
- HGV breakdown (Dual Carriageway)
- Car tyre loss (Single Carriageway)
- Car tyre loss (Dual Carriageway)
- Car breakdown (Single Carriageway)
- Car breakdown (Dual Carriageway)
- LGV tyre loss (Single Carriageway)
- LGV tyre loss (Dual Carriageway)
- LGV breakdown (Single Carriageway)
- LGV breakdown (Dual Carriageway)
- Partial load loss – HGV (Single Carriageway)
- Total load loss – HGV (Single Carriageway)
- Partial load loss – LGV (Single Carriageway)
- Total load loss – LGV (Single Carriageway)
- Partial load loss – HGV (Dual Carriageway)
- Total load loss – HGV (Dual Carriageway)
- Partial load loss – LGV (Dual Carriageway)
- Total load loss – LGV (Dual Carriageway)
- Hazardous spill – HGV (Single Carriageway)
- Hazardous spill – LGV (Single Carriageway)
- Hazardous spill – HGV (Dual Carriageway)
- Hazardous spill – LGV (Dual Carriageway)
- Police – Traffic Incident Investigation (Single Carriageway)
- Police – Traffic Incident Investigation (Dual Carriageway)
- Vehicle Fire (Single Carriageway)
- Vehicle Fire (Dual Carriageway)
- Roadside Fire (Single Carriageway)

Roadside Fire (Dual Carriageway)  
 Adjacent Field/Woodland Fire (Single Carriageway)  
 Adjacent Field/Woodland Fire (Dual Carriageway)  
 Fatal Traffic Accident (Single Carriageway)  
 Fatal Traffic Accident (Dual Carriageway)  
 Carriageway Flooding (Single Carriageway)  
 Carriageway Flooding (Dual Carriageway)  
 Emergency Carriageway Repair (Single Carriageway)  
 Emergency Carriageway Repair (Dual Carriageway)  
 Single agricultural vehicle (Single Carriageway)  
 Single agricultural vehicle (Dual Carriageway)  
 Potato/Beet harvesting convoy (Single Carriageway)  
 Potato/Beet harvesting convoy (Dual Carriageway)  
 Steam powered slow moving vehicle (Single Carriageway)  
 Steam powered slow moving vehicle (Dual Carriageway)  
 Steam powered vehicle breakdown (Single Carriageway)  
 Steam powered vehicle breakdown (Dual Carriageway)  
 Wide/Exceptional (non-Sizewell C) Loads (Single Carriageway)  
 Wide/Exceptional (non-Sizewell C) Loads (Dual Carriageway)  
 Wide/Exceptional (non-Sizewell C) Overnight lay-ups (Single Carriageway)  
 Wide/Exceptional (non-Sizewell C) Overnight lay-ups (Dual Carriageway)  
 Folk East Festival traffic (build up, event, clear down)  
 Latitude Festival traffic (build up, event, clear down)  
 Blaxhall Motocross traffic (build up, event, clear down)

### 10.2.3 KcCPC note the content of the paragraph

KcCPC is ill equipped to either contest or confirm the EDF Energy assertion that "...the design capacity of a new single carriageway road is 13,000 vehicles per day (Ref. 10.1). The traffic flows predicted to use a link road, as set out in Chapter 6 of this volume, are significantly lower than this with up to **2,300 vehicles** expected to use the road during the peak construction period..." because, as identified elsewhere in this response EDF Energy seem unable to be consistent in the use of movements, deliveries, departures and vehicles when referring to road forecasts and/or capacity.

However, on the assumption that a 'vehicle' is equivalent to a 'movement' KcCPC anticipate the traffic forecast on the EDF Energy proposed Sizewell link, at peak construction, under a road-lead option to comprise at least:

HGV deliveries to Main Site	750
HGV departures from Main Site	750
Bus movements per day	500+
LGV movements	700
Workforce movements	500+(?) estimate only
Other traffic	500+(?) estimate only
<b>Total</b>	<b>3,700+</b>

## 10.3 Scheme requirements

### 10.3.1 KcCPC note the content of the paragraph

As pointed out earlier in this response, the fundamental issues of a Sizewell C construction route utilising the A12 along most of its length, are far more onerous than those implied by the simplistic approach being taken by EDF Energy.

Consequently, KcCPC repeat that, the simplicity with which EDF Energy assert that "There are a number of environmental designations and constraints which affect the options for route alignment considered by EDF Energy..." and "key environmental considerations that are likely to arise from the construction and operation of the new link road as well as identifying potential measures which may be required to avoid or mitigate

potential effects. It also sets out the next steps which will inform the ongoing development of the link road proposal..." is not strictly the case, approximating as it does to, the number of ways to thread a needle!

The stark reality is that EDF Energy fully understands the limitations of an A12 based route, and have wilfully manufactured a situation where mitigating issues (of its own construction) in respect to the B1122 is being brought forward as the 'game changer'. It clearly is not!

However, in so doing EDF Energy hope to evade three compelling realities face on:

- A]** Without a marine or significantly more ambitious rail fulfilled construction programme, any road-led Proposal may prove unsustainable.
- B]** The cumulative traffic impacts of projects reliant on the A12 as a primary delivery mechanism, combined with East Suffolk's housing commitment to Government and its ambitions for 'year-round' tourism are far greater than anticipated. The further obstacle of A14 congestion at J58, combined with Felixstowe expansion and a new RoRo initiative just add unwelcome complications to a untenable logistics management task.
- C]** As a complex project (and arguably the most challenging) toward the northern end of East Suffolk, mitigating both risks and impacts in this environment may jeopardise timely delivery of Sizewell C, without further significant investment, potentially compromising the current business and investment case.

**10.3.2** KcCPC note the content of the paragraph

**10.3.3** KcCPC note the content of the paragraph and Figure 10.1

KcCPC is once again concerned that EDF Energy, although not compelled too, did not have the courtesy to contact KcCPC prior to publishing proposed routings through the Parish that, may not only impact the designated Conservation Area, but also a potential roadside nature reserve.

Moreover, KcCPC note the disdain that EDF Energy have repeatedly demonstrated for the Parish Council and residents of the Parish in referring to the western end of the proposed EDF Energy Sizewell Link road as "...south of Yoxford..." rather than the correct attribution as the northern edge of Kelsale cum Carlton. Hardly an oversight when repeatedly omitted and yet located so close to the A12 village sign?

For the avoidance of doubt, KcCPC and its residents (after a Public meeting and data gathering via a questionnaire) are:

- in principle, in favour of a rail-led strategy, but unable to offer their full support to the strategy brought forward at Stage 3, as it believes the proposal lacks ambition and is a sub-optimal solution to a substantive need.
- opposed to the road-led strategy brought forward at Stage 3.
- opposed to the EDF Energy Sizewell Link road option brought forward at Stage 3.
- opposed to all further link road options (current or new) until EDF Energy objectively review the sustainability of any proposals, where the majority of the route is dependent on a largely unmodified A12 and is host to the multiplicity of projects currently under consideration, or already approved. Moreover, KcCPC would expect EDF Energy's modelling to fully reflect the burden of tourist traffic.

**10.3.4** KcCPC note the content of the paragraph

KcCPC wish it to be noted that it is host to roadside nature reserves and also contains Carlton Park, a Non-Designated Heritage Asset. Although not adjacent to the proposed route, along with the Conservation Area they are constituents of an important landscape, as identified in research undertaken prior to the Conservation Area's designation.

KcCPC also confirm that the Parish's bio-diversity group, having undertaken a number of investigations confirm the existence of Greater Crested Newt colonies across the Parish, along with a wide range of flora and fauna noted in local and national 'lists' as being in decline or at varying degrees of risk.

10.3.5 KcCPC note the content of the paragraph

KcCPC note that EDF Energy hold the view that "All of the possible highway routes lie outside of these landscape designations, but may be considered as part of their setting. It is anticipated that none of the routes would have significant adverse effects that would arise as a consequence." but as might be expected, hold the contrary view, especially in light of the research undertaken by an independent consultant prior to obtaining a Conservation Area designation in the Autumn of 2018.

10.3.6 KcCPC note the content of the paragraph

Please see note in respect of the importance of the PRoW network to residential and tourist amenity within the appropriate sections of this response.

10.3.7 KcCPC note the content of the paragraph

KcCPC note the topographic references made by EDF Energy but see no compelling argument or attributes that make the proposed route unique in meeting a specific or demanding requirement.

What KcCPC do see, is good quality agricultural land, with mixed wooded areas and other attractive habitats for a wide range of flora and fauna. At the same time, its positioning makes a complimentary accompaniment to the coastal areas of the AONB and the RSPB Reserve at Minsmere, offering a restful and recuperative location for migratory birds, as an example several hundred Golden Plover were seen close by earlier this year.

#### 10.4 Route alignments considered

10.4.1 KcCPC note the content of the paragraph and Figure 10.1

a) Route alignments considered

10.4.2 KcCPC note the content of the paragraph

b) Route W North

10.4.3 KcCPC note the content of the paragraph

b) Route X KcCPC note 2 x 'b'

10.4.4 KcCPC note the content of the paragraph

c) Route Y

10.4.5 KcCPC note the content of the paragraph

10.4.6 KcCPC note the content of the paragraph

d) Route Z

10.4.7 KcCPC note the content of the paragraph

10.4.8 KcCPC note the content of the paragraph



## 10.5 Justification for route selection

### 10.5.1 KcCPC note the content of the paragraph

KcCPC is shocked at the brevity, lack of detail and the absence of an underpinning rationale in Section 10.5. It seems clear that EDF Energy have decided very late in the day, that their previous B1122 approaches were flawed and presumably as an expedient have assembled a hastily pulled together 'Plan B'.

The result is a less than compelling melange of options, none of which have been extensively researched or have anything substantial to commend them.

### 10.5.2 KcCPC note the content of the paragraph

In respect to the "...high-level environmental analysis...", KcCPC is unsurprised that EDF Energy thought it necessary to qualify it as "...desk-based analysis and a site visit to determine the environmental effects..." and "...The fieldwork undertaken by EDF Energy involved exploring the routes from PRoWs and the local road network...". KcCPC also note that although not identified as a key environmental factor in the narrative, Table 10.1 includes them.

KcCPC note that:

"A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the Proposed Development during the pre-application stage"

Consequently, after reading the PEI, KcCPC perceive the analysis as substantially incomplete, rudimentary and superficial in the majority, limited to providing a commentary rather than undertaking any noteworthy investigation.

Examples of which are catalogued below [with KcCPC's consultation responses](#):

PEI 5.2.6 No mention is made of the visual receptors at Kelsale Lodge Cottages, Rosetta Cottage and Buskie Farm

PEI 5.2.10 "...mitigation to help and reduce potential landscape and visual effects would be difficult. However, the following measures would be implemented." So "Construction compounds to be located in close proximity to existing road or rail infrastructure, in areas already disturbed by traffic or trains." meaning one property (Rosetta Cottage at North Green) is surrounded on three sides by a proposed construction compound, to add to the A12 traffic less than 100 yards to the west and Town Farm Lane immediately to the South. Noting of course "Existing vegetation to be retained around the compound to reduce visibility of the compound"!

"Eleven PRoWs (all footpaths) would be diverted for the construction of the proposed link road...with a further two potentially..." See KcCPC's comments about the PRoWs for local amenity and tourism at Chapter 17 – 17.11.2

PEI 5.2.12 During construction of the proposed link road, there would be a localised change to the landscape character of the link road...linear woodland would be removed along with sections of hedgerows...there would also be localised effects on landscape character...given the localised extent...and the short-term duration of the construction period, effects are unlikely to be significant." Short-term, 24 months – unlikely to be significant, really?

PEI 5.2.15 "Effects on the landscape character of each of the fields that the proposed link road passes through would be significant and adverse...However, these significant effects would not be widespread..." not widespread along a 6.8km length of 10m wide (plus 5 metre berm) road, lit at junctions with 10m columns...in a predominantly dark area...not widespread, really?

This sort of blinkered thinking will effectively lay waste to a previously unsullied tract of agricultural land providing valuable habitats for mammals, reptiles, birds, flowers and insect life. Moreover, with 10m columns,



it will inflict unwelcome light pollution in an area where local residents and tourists currently enjoy unparalleled views of an increasingly rare 'dark' night sky.

PEI 5.2.22 KcCPC note that "...likely to be localised effects on the SLA...unlikely that there would be any significant effects...on the special qualities or the purposes of its designation".

It is unclear to KcCPC how "...desk-based analysis and a site visit to determine the environmental effects..." and "...The fieldwork undertaken by EDF Energy involved exploring the routes from PRoWs and the local road network..." can be relied upon (with any degree of certainty) to make valid judgements on such specific issues, and would welcome evidence attesting to the veracity of such claims.

PEI Table 5.2.2 **Topic/Receptor** **Assessment** **Residual effects**

Landscape character within the site and its surrounding context	Significant	Significant
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Users of the footpaths and local roads that currently cross the proposed route	Significant	Significant
--	-------------	-------------

PEI 5.3.7 KcCPC note the hydrological link between drains and watercourses within the proposed route and Minsmere River, in turn flowing into the Minsmere and thence the Walberswick Heath and Marshes SPA, SAC and Ramsar site and question what measures need to be taken to reduce the impact of;

- accumulated pollutants in the management of surface water
- significant diesel and/or petrol spills
- other noxious liquid, granulated or otherwise transmittable substances

PEI 5.3.8 KcCPC is concerned that despite acknowledging "A number of notable invertebrate species have been recorded in the wider area, predominantly (but not exclusively) associated with the surrounding designated sites." EDF Energy seek to minimise the potential impact of the proposed route by saying "Based on the information to date...route alignment is predominantly arable...habitats...are unlikely to be of particular importance..."

PEI 5.3.9 KcCPC is gratified that EDF Energy admit knowledge of populations of Great Crested Newts and point out that that there are significant populations identified by the Kelsale cum Carlton Bio-diversity team in virtually all of the ponds analysed to date (including East Green, Curlew Green, Dorley's Corner, Kelsale Village and Carlton).

Moreover, KcCPC have been informed (by the owner) that the pond at Fir Tree Farm has also been surveyed and found to be home to a significant colony as have areas at the Fromus Wildlife Reserve adjacent to the A12.

PEI 5.3.10 KcCPC is concerned that despite acknowledging "...field and woodland margins could provide foraging habitat...". EDF Energy seek to minimise the potential impact of the proposed route by saying "...habitats within and in close proximity to the proposed route alignment are unlikely to be of particular importance to reptiles."

KcCPC note that Kelsale cum Carlton parish is host to; grass snakes (*Natrix natrix*), common lizards (*Zootoca vivipara*), slow worms (*Anguis fragilis*) and adders (*Vipera berus*).

PEI 5.3.11 KcCPC note the species of birds attributed as being typical of open agricultural habitats, but point out that the arable land of Kelsale cum Carlton and the neighbouring communities also play host to significant populations of migratory birds as they prepare to leave, or reach landfall on their inbound journey.

In addition, the fields of the Kelsale cum Carlton area are also home/larder to; buzzard, kestrel, barn owl, tawny owl, little owl, peregrine falcon, sparrowhawk, Golden Plover, Lapwing amongst others.

PEI 5.3.12 KcCPC note the species of bats recorded in the wider area and confirm the presence of bats in rural buildings and woodland throughout the parish, although no structured analysis has been undertaken by the Kelsale cum Carlton bio-diversity group.

PEI 5.3.13 KcCPC note the content of the paragraph

PEI 5.3.14 KcCPC confirm the irregular sighting of otters in East Green and their feeding in local ponds

PEI 5.3.15 KcCPC note the content of the paragraph

PEI 5.3.16 KcCPC confirm the presence of badgers

PEI 5.3.17 In the absence of a detailed habitat loss mitigation plan, and the fragility of some of the species that may be impacted, KcCPC is sceptical about the practicality of EDF Energy's plans for remediation of the proposed route.

KcCPC note what a CEMP 'might do', but in the absence of any evidence, remain unconvinced in respect to EDF Energy's understanding of the scope necessary to effectively manage protection, retention and remediation along the length of the proposed route.

KcCPC note the intention of EDF Energy to deploy newt tunnels, but are concerned that research conducted over 5 years and published in 2017 found that:

*"The team of scientists set out to find out how effective road tunnels are. Using 5 years of monitoring data from a major road mitigation scheme, they provided the first hard evidence that newts use tunnels to move between feeding and breeding sites. This means that road tunnels may help connect populations of newts and other small species across fragmented landscapes, by allowing animals to move between ponds and maintain genetic exchange. Small, isolated populations are otherwise very prone to extinction. But it wasn't all good news. Writing in the journal PeerJ, they showed that females made much more use of tunnels than males, potentially risking imbalances in the sexes over the long term. And, rather than tunnels connecting newts to ponds as they migrate to breed in spring, most of the action happened in autumn, meaning that tunnels might help newts find their way to their feeding and hibernating sites better than to their breeding ponds. Tunnels are usually accompanied by fences which stop newts wandering onto the road and direct them towards the tunnels. But most of the newts that contact the fences don't reach tunnel entrances, and of those that do, few attempt to cross. The researchers suggest that maximising the number of tunnels, putting ponds close to tunnel entrances, and on both sides of roads might help resolve these problems."*

**Source:** Cambridge Conservation Forum 2018

KcCPC note EDF Energy's proposed approach to the presence of Barn Owl, but are concerned about the impact of the proposed route on Barn Owl populations, noting 'that Barn Owl deaths occur largely as a result of them crossing the carriageway, rather than as a consequence of verge hunting' (Colin Shawyer and Nick Dixon report for The Highways Agency).

The same report recommends "A comprehensive programme of nestbox provision should be undertaken on farmland at least 1.5 km either side (of the route). This should be targeted close to those linear grasslands which are identified as important dispersal corridors for Barn Owls which when intersecting the road were responsible for high levels of mortality."

KcCPC note with concern that "...construction lighting would be designed to minimise light spill into adjacent habitats. This would reduce impacts on nocturnal species such as bats for roosting or foraging", and draw EDF Energy's attention to guidance issued by the Institute of Lighting Professionals on the 12<sup>th</sup> September 2018 entitled "Guidance Note 8 Bats and artificial lighting" available at:

<https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

KcCPC note that "If confirmed to be present along the route...passage for otters and water voles would be maintained..." and suggest that as otters are unlikely to be resident, but similar to parts of Kelsale cum Carlton, may visit the route location, passage should be maintained irrespective of confirming evidence. Moreover, steps should be taken to avoid otters straying onto the carriageway.

KcCPC note that there is no consideration given by EDF Energy to safeguarding and maintaining the route of Red Deer migration from the ancient deer park at the Fromus Reserve (adjacent to the A12), crossing the A12

south of the Town Farm Lane junction (by Kelsale Lodge Cottages) across the proposed route and off to the rutting grounds on the coastal heathlands.

PEI 5.3.18 KcCPC is gravely concerned that (without any evidence) EDF Energy have determined that "Significant effects on designated sites, plants and habitats, invertebrates, reptiles, breeding birds, otters, water voles and badgers are not anticipated and they are not discussed further in this section of the PEI." and do not believe that is satisfactory for EDF Energy to conclude that "a detailed ecological impact assessment will be presented for these habitats and species within the ES...details of the embedded mitigation required...would similarly be provided."

KcCPC believes that the fullest consideration of the environmental impact of the proposed Sizewell Link road is essential to 'good informed decision making' and for EDF Energy to deal with these matters at Stage 3 in such a highhanded fashion is to undermine one of the principle requirements of a public consultation, insofar as there is no opportunity for public scrutiny prior to an application being made.

PEI 5.3.19 KcCPC note the content of the paragraph

PEI 5.3.20 KcCPC draw attention to comments made at 5.3.17 (above)

PEI 5.3.21 KcCPC draw attention to comments made at 5.3.17 (above)

PEI 5.3.22 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.3.23 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed ecological assessment for the ES and it being made available for public scrutiny, prior to an application being made.

PEI 5.3.24 KcCPC note that the content of this paragraph and Table 5.3.1

KcCPC is concerned at the lack of reference to a role for the RSPB, in assessing the potential impacts on ornithology and the supervision of mitigating actions.

PEI 5.3.25 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed and extended Phase 1 habitat survey and ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.3.25 KcCPC note the content of the paragraph

KcCPC draw attention to comments made at 5.3.17 (above) and look forward to the completion of a detailed and extended Phase 1 habitat survey and ecological assessment for the ES and them being made available for public scrutiny, prior to an application being made.

PEI 5.4.2 KcCPC note the content of the paragraph

KcCPC note the continuing omission of Kelsale cum Carlton in consideration of the proposed EDF Energy Sizewell Link road.

PEI 5.4.7 KcCPC note the content of the paragraph

KcCPC anticipate EDF Energy undertaking limited tree and hedgerow removal under strict supervision and being subject to a pre-approved plan agreed with a suitable authority.

PEI 5.4.8 KcCPC note the content of the paragraph

As the impacts of; changed views, increased noise, dust and other emissions may impact both resident and tourist enjoyment of the amenity and in the extreme, may also be injurious to their health, KcCPC regard the provision of a public service giving specific warnings/updates on a regular basis (daily?), via; the internet, bulletins to Parish Clerks (perhaps through SALC), publication in the press and through Suffolk Coastal tourism agencies.

PEI 5.6.5 KcCPC note the content of the paragraph and Table 5.6.1

KcCPC note that the EDF Energy proposal for a Sizewell Link road removes over 120 hectares of predominantly good quality arable land from production, at a time when, many commentators regard the need for home market-based farm productivity to rise in order to meet the challenges of a post Brexit economy, as essential.

PEI 5.6.5 KcCPC note the content of the paragraph and Figure 5.6.3

KcCPC note the continuing omission of Kelsale cum Carlton in consideration of the proposed EDF Energy Sizewell Link road and draw attention to a significant portion of land under 'Organic Entry Level plus Higher Level Stewardship' referred to as 'land immediately to the south-west of the scheme boundary to the south-west of Theberton' is in fact largely in Kelsale cum Carlton parish.

PEI 5.6.17 KcCPC note the content of the paragraph

KcCPC draw EDF Energy's attention to comments made regarding an historic Red Deer migratory route crossing the EDF Energy proposed Sizewell Link road route.

Specifically, that there is no consideration given by EDF Energy to safeguarding and maintaining the route of Red Deer migration from the ancient deer park at the Fromus Reserve (adjacent to the A12), crossing the A12 south of the Town Farm Lane junction (by Kelsale Lodge Cottages) across the proposed route and off to the rutting grounds on the coastal heathlands.

In that connection, KcCPC is concerned with the proposals regarding fencing.

KcCPC consider the omission of Red Deer from EDF Energy's consideration as a significant issue, with no clear resolution identified during either the construction and/or operation phases.

PEI 5.6.28 KcCPC note the content of the paragraph

KcCPC note that EDF Energy are not bringing forward any mitigation for the loss of 120 hectares of BMV land!

PEI 5.6.30 KcCPC note the content of the paragraph

KcCPC note that "Once the proposals for the development as a whole are finalised, a full assessment of the proposals would be undertaken as part of the EIA and the results presented in the EIS. The ES would present a full assessment underpinning the conclusions drawn in relation to significant effects...."

KcCPC is concerned that the EDF Energy approach to a newly proposed road component at Stage 3, means that there is no public scrutiny of the facts pertaining to the veracity of that proposal until an application is made.

Further, KcCPC feel that with such potentially damaging ecological consequences, it is unreasonable and unsound for the proposal to go forward without further Public Consultation and calls for EDF Energy to review the integrity of the Stage 3 consultation, pause, be clear about EDF Energy's preferred way of moving forward and inject a Stage 4 consultation where EDF Energy's thinking is sound and evidenced.

PEI 5.7.2 KcCPC note the content of the paragraph

KcCPC note that "Baseline survey work has yet to be undertaken for the (EDF Energy) Sizewell Link road." and that EDF Energy believes that a robust "...preliminary consideration of noise and vibration impact can be made without reference to existing baseline values." moreover, without qualification EDF Energy assert that "It is likely that existing noise levels will be relatively low since the area is predominantly rural."

PEI 5.7.3 KcCPC note the content of the paragraph and Table 5.7.1

KcCPC do not understand why properties adjacent to the EDF Energy proposed Sizewell Link road are omitted from "Table 5.7.1 Noise vibration receptors in the vicinity of the proposed Sizewell link road" including Rosetta Cottage, Kelsale Lodge Cottages, The Farmhouse B&B, Mile Hill Barn and Gallery.

PEI 5.7.6 KcCPC note the content of the paragraph

KcCPC welcome EDF Energy's commitment to putting in place a system for receiving and recording complaints in respect to noise and vibration. KcCPC look forward to the early publication of the process and reporting arrangement. KcCPC is particularly interested in understanding the whole complaint management process and the escalation arrangements.

PEI 5.7.7 KcCPC note the content of the paragraph

KcCPC note the inferred preference for a mandatory 50mph speed limit on the EDF Energy proposed Sizewell Link road, in order to limit noise levels.

KcCPC is interested to understand the consequences of a 50mph speed limit, in respect to HGV pollution levels, changes to pollutant propagation behaviours and changes to dust propagation behaviours.

PEI 5.7.8 KcCPC note the content of the paragraph

KcCPC note noise and vibration levels have been predicted by calculation and modelling.

Were some of the buildings in the immediate vicinity of the proposed A12 roundabout built on foundations below modern norms, on a loose underpinning soil, what additional mitigations would EDF Energy make to avoid such buildings being disproportionately impacted by Sizewell C construction traffic?

PEI 5.7.10 KcCPC note the content of the paragraph and Figure 5.7.1

KcCPC note noise from the compound area is anticipated by EDF Energy to have a significantly adverse impact on Fir Tree Farm, but seemingly not effect Rosetta Cottage, Mile Hill Barn & Gallery, Kelsale Lodge Cottages and The Farmhouse B&B.

How can EDF Energy so accurately forecast the localisation of noise nuisance?

PEI 5.7.12 KcCPC note the content of the paragraph

KcCPC note noise and vibration levels at other receptors during construction are unlikely to have a significant adverse impact, but no quantification or comparisons are provided. Why are EDF Energy so reluctant to evidence their assertions?

PEI 5.7.13 KcCPC note the content of the paragraph

KcCPC note noise levels are forecast to be at their worst on the 'busiest day', but no quantification or comparisons are provided. Why are EDF Energy so reluctant to evidence their assertions?

PEI 5.7.15 KcCPC note the content of the paragraph

KcCPC refer EDF Energy to comments at 5.7.12 and 5.7.13 above

PEI 5.7.19	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note EDF Energy anticipate that even with mitigations, significant noise impacts will likely last 4-6 weeks!!</p>
PEI 5.7.22	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note that a baseline noise environment has yet to be established and EDF Energy still do not have agreed construction methodologies, or layouts at Stage 3 consultation. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.</p>
PEI Table 5.7.2	<p>KcCPC note the content of the Table</p> <p>KcCPC note the incomplete list of Noise and Vibration receptors used in this table (as described in 5.7.3 above)</p>
PEI Table 5.7.3	<p>KcCPC note the content of the Table</p> <p>KcCPC note the absence of Fir Tree Farm in this table (as described in 5.7.3 above)</p>
PEI 5.8.1	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note the absence of human receptors at properties described in 5.7.3 above</p>
PEI 5.8.6	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note the absence of properties described in 5.7.3 above and potentially being located within 10m</p>
PEI 5.8.8	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note the absence of any EDF Energy policy insisting all diesel-powered vehicles and vehicles used on the Sizewell C construction programme are equipped with exhaust abatement technologies.</p> <p>KcCPC note that exhaust abatement reduces the emissions from a vehicle or a piece of equipment. A retrofitted vehicle will have emissions below the emission standard which it was originally constructed to meet, and will normally be tested to certify the fact that it meets a new, stricter emission standard. Exhaust abatement technologies are proven to reduce emissions of particulate matter and/or nitrogen oxides, so reducing pollution.</p> <p>Considering the projected volume of HGV's, LGV's, Bus's and construction equipment, why are EDF Energy not demonstrating their commitment to being a 'considerate developer' and enforcing polices aimed at minimising the pollutants generated during construction and operation of Sizewell C?</p>
PEI 5.8.9	<p>KcCPC note the content of the paragraph</p> <p>See notes at PEI 5.8.8 above</p>
PEI 5.8.10	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note that EDF Energy anticipate earthworks and track-out linked with the construction of the EDF Energy proposed Sizewell Link road as being likely to generate dust emissions as high as 'Large' under the IAQM classification and generally at or above 'Medium'.</p>
PEI 5.8.11	<p>KcCPC note the content of the paragraph</p>

PEI 5.8.12	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note that EDF Energy are committed to successfully implementing and monitoring all practical mitigation measures through an effective CEMP, thereby reducing impacts such that there are no “...significant dust effects...” resulting from demolition and construction activities.</p>
PEI 5.8.13	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note that HDV is a term with many interpretations and is not defined beyond Heavy Duty Vehicles, can EDF Energy be explicit about their interpretation not just in respect to PEI 5.8.13, but also how it is used throughout the Stage 3 consultation?</p> <p>Can EDF Energy also confirm that controls will be in place on-site to ensure that the IAQM Screening Threshold is not breached?</p>
PEI 5.8.14	<p>KcCPC note the content of the paragraph</p> <p>See notes at PEI 5.8.8 above</p>
PEI 5.8.15	<p>KcCPC note the content of the paragraph</p> <p>See notes at PEI 5.8.8 above</p>
PEI 5.8.19	<p>KcCPC note the content of the paragraph</p> <p>See notes at PEI 5.8.8 above</p>
PEI 5.8.22	<p>KcCPC note the content of the paragraph</p>
PEI Table 5.8.1	<p>KcCPC note the content of the Table</p>
PEI Table 5.8.2	<p>KcCPC note the content of the Table</p>
PEI 5.9.12	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of “...where considered necessary...”. KcCPC is minded that because of the primary purpose of the EDF Energy proposed Sizewell Link road (i.e. predominantly diesel-powered HGV vehicles) there is no “...where considered necessary...”. the provision should be considered ‘essential’ throughout the length of the road.</p>
PEI 5.9.24	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note that only “Once the proposals for the Sizewell C Project development as a whole are finalised, a full land quality assessment of the proposals...” will be undertaken. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.</p>
PEI 5.10.9	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note an apparent contradiction of “There is no data available on groundwater abstractions within 1km of the site.” and the observation that “...two private and one licenced groundwater abstractions located 200m west of the site’s eastern extent;” made at para 5.9.3. Which is correct?</p>
PEI 5.11.9	<p>KcCPC note the content of the paragraph</p> <p>KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of “...where considered necessary...”. KcCPC is minded that because of the activity being undertaken by specific</p>



vehicle types (i.e. predominantly diesel-powered HGV vehicles) there is no "...where considered necessary...". the provision should be considered 'essential' throughout the construction sites.

PEI 5.10.14 KcCPC note the content of the paragraph

KcCPC note an apparent contradiction that "...Construction drainage would likely be contained within the construction sites, with drainage to ground where possible." if drainage is 'to ground' is it "contained within the construction sites"?

PEI 5.9.20 KcCPC note the content of the paragraph

KcCPC note the incorporation of petrol/oil interceptors within the drainage design, but note the inclusion of "Where considered necessary...". KcCPC is minded that because of the primary purpose of the EDF Energy proposed Sizewell Link road (i.e. predominantly diesel-powered HGV vehicles) there is no "...where considered necessary...". the provision should be considered 'essential' throughout the length of the road.

PEI 5.11.10 KcCPC note the content of the paragraph

KcCPC note the mitigations and safeguards proposed by EDF Energy, is it correct to regard these as agreed with the Environment Agency?

The importance of carefully "...phased construction to minimise impacts on the river." alludes KcCPC. Could EDF Energy explain what is meant by this point?

PEI 5.11.21 KcCPC note the content of the paragraph

KcCPC note that only "Once the proposals for the Sizewell C Project development as a whole are finalised, a full assessment of potential effects on the surface water environment..." will be undertaken. As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

PEI Table 5.11.1 KcCPC note the content of the Table and its vagueness in the absence of suitable assessment – see comments at PEI 5.11.21 above

PEI Table 5.11.2 KcCPC note the content of the Table and its vagueness in the absence of suitable assessment – see comments at PEI 5.11.21 above

PEI 5.13.7 KcCPC note the content of the paragraph

KcCPC note the number and severity of traffic collisions

PEI 5.13.8 KcCPC note the content of the paragraph

KcCPC note the number and severity of traffic collisions

PEI 5.13.10 KcCPC note the content of the paragraph

KcCPC note that whilst junctions with minor roads are an integral part of the proposal "...that would mitigate against potential loss of amenity and increased mileage which would otherwise be experienced by users..." they also pose a risk of increasing the use by unscrupulous motorists as 'rat runs'.

As a result, KcCPC would like to see EDF Energy polling residents and agricultural users of these minor roads to see whether options other an 'open access' (i.e. restricted width, unidirectional access, etc.) might be more agreeable in the context of the potential threats.



PEI 5.13.12 KcCPC note the content of the paragraph

KcCPC note that the proposed contractor's compound is sited toward the northern and western boundary of Kelsale cum Carlton parish.

PEI 5.13.13 KcCPC note the content of the paragraph

KcCPC note the inference that construction traffic could use smaller roads.

As a consequence, KcCPC seek categoric assurance from EDF Energy that use of the minor road network surrounding the A12 in Kelsale cum Carlton parish, by EDF Energy construction traffic (i.e. LGV, HGV and buses) would be proscribed and rigorously controlled.

To do otherwise would compromise the amenity the network provides to; residents, tourists, walkers, horse riders, cyclists and lead to potentially dangerous situations arising when agricultural traffic meets other large vehicles on single track lanes with no (or few) passing places.

PEI 5.13.14 KcCPC note the content of the paragraph

KcCPC note the potential disruption to rail passengers occasioned by the installation of the road overbridge.

KcCPC also note the inference that 'bridge component' traffic could use smaller roads.

As a consequence, KcCPC seek categoric assurance from EDF Energy that use of the minor road network surrounding the A12 in Kelsale cum Carlton parish, by EDF Energy 'bridge component' traffic (i.e. LGV, HGV and buses) would be proscribed and rigorously controlled.

To do otherwise would compromise the amenity the network provides to; residents, tourists, walkers, horse riders, cyclists and lead to potentially dangerous situations arising when agricultural traffic meets other large vehicles on single track lanes with no (or few) passing places.

PEI 5.13.21 KcCPC note the content of the paragraph

KcCPC note that construction of the EDF Energy proposed Sizewell Link road is to happen in the 'early years' at the same time as the; accommodation campus, both Park & Rides, the FMF, 2 villages bypass, etc..

KcCPC is concerned at this apparent simultaneous enactment of activity along the length of the A12 and wish to understand how EDF Energy propose to deal with the complications this strategy implies.

For example;     - the handling of Traffic Incidents, without Wickham Market Park and Ride being in place?  
                          - the management and control of traffic movements without the FMF in place

PEI 5.13.22 KcCPC note the content of the paragraph

KcCPC note that construction of the EDF Energy proposed Sizewell Link road is projected to be built during the 'early years', take 24 months, but be available for use prior to the peak in 2027.

PEI 5.13.31 KcCPC note the content of the paragraph

KcCPC note the intent of the west of Middleton Moor B1122/Sizewell link and question whether:

- sufficient consideration has been given to traffic flow integration at the Sizewell Link end
- sufficient consideration has been given to 'flow crossing' to access this link on the return journey

And whether similar issues may pertain to the proposed B1125 Junction further east.

PEI 5.13.32 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention to compel Sizewell C construction HGV traffic and Buses to proceed south through Yoxford to join the EDF Energy Sizewell Link road at the crest of Mile Hill near Town Farm Lane.

KcCPC also note that EDF Energy have no intention to compel workforce traffic and Light Goods Vehicles to use the EDF Energy Sizewell Link road at the crest of Mile Hill near Town Farm Lane.

Further, KcCPC note EDF Energy make no comment in respect to where returning traffic will be routed and likewise in respect to traffic using the B1125 for inbound journeys?

However, KcCPC assume some rationale must have been applied by EDF Energy in arriving at their forecast volumes of 'Vehicles'?

The lack of clarity and a substantiated rationale casts some considerable doubt on the integrity of the forecasts made by EDF Energy and whether they are achievable!

PEI 5.13.36

KcCPC note the content of the paragraph

KcCPC note that "Once the design for the Sizewell Link road is developed further and in more detail, a traffic and transport assessment will be undertaken and will be used to inform the ongoing EIA and the ES." As a consequence of this and other incomplete preparatory work having been undertaken, KcCPC believes another consultation on an EDF Energy proposed Sizewell Link road is required prior to any application for a development order being made.

10.5.3

KcCPC note the content of the paragraph and Table 10.1

In respect to Table 10.1, KcCPC is unconvinced as to how it adds any clarity to the decision making or route selection justification.

Presumably EDF Energy have applied 'weightings' to particular elements within the table, and are not prepared to share the underpinning rationale leading to the proposal they have brought forward at Stage 3 of the consultation. Irrespective, as presented Table 10.1 does not constitute a 'decision making matrix' of any typical form.

10.5.4

KcCPC note the content of the paragraph

In respect to the content, KcCPC note that it is largely a commentary rather than a justification for or against the route(s) – KcCPC noting that seemingly EDF have considered two routings (W North and W South), but do not distinguish between either in the narrative.

KcCPC also note that EDF Energy make the assertion that "...it is likely the necessary engineering works to traverse the landform would have a significant adverse effect on the existing landscape character..."

KcCPC is of the opinion that any route's existing landscape is likely to be significantly adversely impacted by a two-lane carriageway.

10.5.5

KcCPC note the content of the paragraph

In respect to the content, KcCPC note EDF Energy have omitted any reference to; passing within 50m of a designated Conservation Area, the density of housing immediately adjacent to the route (including a recently approved development of 43 dwellings), a recreation ground with children's playground immediately adjacent, a primary school less than 100m from the route, an adjacent light industrial estate and a non-designated parkland setting identified in the Draft SCDC Local Plan.

10.5.6

KcCPC note the content of the paragraph

In respect to the content, KcCPC point out that Route Y is not "...positioned north of Saxmundham and Kelsale...", it lies in the Parish of Kelsale cum Carlton and impacts directly on the communities at Curlew Green and Dorley's Corner.

Moreover, the route bisects Tiggins Lane in close proximity to the northern border of the designated Conservation Area of Kelsale Village and near a valuable ecological Roadside Nature Reserve.

10.5.7 KcCPC note the content of the paragraph

In respect to the content, KcCPC refer EDF Energy to their PEI responses (above at 10.5.2 onwards)

#### **10.6 Consideration of route "D2"**

10.6.1 KcCPC note the content of the paragraph

10.6.2 KcCPC note the content of the paragraph

10.6.3 KcCPC note the content of the paragraph

10.6.4 KcCPC note the content of the paragraph

Without wishing to labour the point, it is the view of KcCPC that; any Sizewell C construction programme based largely on delivery of materials on the A12 must be considered unsound.

In that connection, KcCPC wish to make two fundamental observations regarding the construction of Sizewell C and the impacts that will be felt directly and indirectly on the Suffolk Coastal area, all the way from Felixstowe in the south to Lowestoft in the north.

Firstly, unpalatable as it may be, EDF Energy must recognise that the cumulative impact of multiple energy related projects, a significant housebuilding programme, a need to develop 'year-round' tourism and poor infrastructure mean that the A12 is totally unprepared and unsuitable for the combined traffic 'onslaught' it will endure over the next 10-15 years.

KcCPC assume that as a mature, internationally significant corporate, EDF Energy must have recognised that the A12 constitutes an unacceptably high risk, single point of vulnerability [SPV], that has no viable alternative and as such, must be remedied in order to secure the much needed investment for the project.

Secondly, assuming that EDF Energy can; find a position that it is comfortable with in respect to the risk posed by the A12 SPV, manages to attract the necessary investment, obtains a development order and is able to commence work, the reality is that on a daily basis, it will walk an operational tightrope, hoping a 25-30 mile journey made by at least 225 HGV vehicles, on an ill-disposed road does not meet with any disruption.

Effectively, without tackling the fundamental A12 issue, EDF Energy are backing a daily 12,000+ mile 'punt' on the durability and resilience of the A12, with no levers under their control!

KcCPC believes that this situation is untenable and fear the impacts on; residents, businesses, the environment, visitors and wildlife will be so widespread, it will lead to long term damage that will take a decade to recover from.

In order to illustrate the potential vulnerability of an A12 facilitated programme requiring 10,700,000 of construction materials, the following pages (along with everyday events identified at 10.2.2 above) aim to substantiate KcCPC's assertion.

## **10.7 The proposed Sizewell link road**

### **a) Route description**

**10.7.1** KcCPC note the content of the paragraph and Figure 10.2

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.2** KcCPC note the content of the paragraph and Figure 10.2

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.3** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.4** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

KcCPC wish EDF Energy to note that the western end of the proposed Sizewell Link road lies in Kelsale cum Carlton (not the esoterically referenced "...south of Yoxford...").

**10.7.5** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.6** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

### **b) Earthworks**

**10.7.7** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

### **c) Surface water**

**10.7.8** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.9** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.10** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**d) Vehicle restraint systems**

**10.7.11** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**e) Rights of way**

**10.7.12** KcCPC note the content of the paragraph and Figures 10.3-10.7

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**f) Lighting**

**10.7.13** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.14** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.15** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.7.16** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8 Construction of Sizewell link road**

**10.8.1** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8.2** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8.3** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8.4** KcCPC note the content of the paragraph and Figure 10.3

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8.5** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.8.6** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

#### **10.9 Operation of the Sizewell link road**

**10.9.1** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**10.9.2** KcCPC note the content of the paragraph

KcCPC refer to the preceding notes in Section 10, and elsewhere in respect to specific dimensions of the proposal (reflecting where they are dealt with by EDF Energy in the Stage 3 consultation).

**11 Theberton Bypass (Volume 1, Pages 324 to 331)**

**11.1 Introduction**

11.1.1 KcCPC note the content of the paragraph

11.1.2 KcCPC note the content of the paragraph

KcCPC note that "...councils at Yoxford, Theberton and Middleton-cum-Fordley, together with the Theberton and Eastbridge Action Group on Sizewell, were strongly opposed at Stage 2 to using the B1122 as..." and also note, EDF Energy do not develop the views expressed by these Councils or the alternatives strategies that were brought forward by them.

KcCPC also note that EDF Energy recognise "that the environmental impacts from, in particular, noise, vibration and severance from the Sizewell C traffic would require mitigation under the both the rail-led or the road-led strategy." and that "...the B1122 is not close to its traffic carrying capacity."

11.1.3 KcCPC note the content of the paragraph

KcCPC is clear that it is for the Theberton Parish Council, the residents and businesses of the Parish to determine where the proposals being brought forward by EDF Energy are suitable and advantageous mitigations for the potential damage to the built environment, health and well-being of the village. It is anticipated that Theberton may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed bypass and ancillary works.

KcCPC as a bordering Parish note, the loss of visual and recreational amenity arising from the proposed bypass, and the potential effect of 'ringing' Theberton with roads, along with the miseries that may bring.

11.1.4 KcCPC note the content of the paragraph

KcCPC believes it is disingenuous for EDF Energy to talk about the proposed bypass removing all Sizewell C construction and "existing through traffic" from Theberton, when previously in the Stage 3 consultation documents, EDF Energy have themselves indicated high levels of re-routing by existing traffic to avoid the Sizewell Construction traffic flow.

KcCPC once again note EDF Energy's reference to "...the construction workers arriving by car..." and point out that EDF Energy's currently woeful car sharing ambitions could make a substantial difference to this unnecessarily high number, if lifted to a minimum of 3 people sharing a car in order to gain access to Main Site parking.

11.1.5 KcCPC note the content of the paragraph

KcCPC note the assertion that the bypass "...would substantially reduce traffic volumes passing through Theberton, resulting in the reduction in noise..." and wonder what evidence there is that substantiates this, particularly in respect to 'ambient noise', an injurious feature for many communities alongside motorways, trunk roads and bypasses.

KcCPC also note that EDF Energy make no reference to airborne pollution, specifically dust, which may increase disproportionately from the high HGV/Bus volumes traversing the bypass at a higher average speed (50mph design speed) than the current route.

11.1.6 KcCPC note the content of the paragraph

KcCPC note the assertion that "The bypass would also continue to relieve Theberton of through traffic after Sizewell C construction completion and thereby provide a major legacy benefit for the village." but point out that one unforeseen consequence of bypasses in other parts of the country (particularly in holiday destinations), is a marked decline in business fortunes attributable to the loss of 'passing trade' revenues.

11.1.7 KcCPC note the content of the paragraph

### 11.2 Scheme requirements

11.2.1 KcCPC note the content of the paragraph

11.2.2 KcCPC note the content of the paragraph

KcCPC note that EDF Energy's obsession with 'capacity' is again exposed when referencing the 'sufficiency' of the proposed Theberton bypass.

However, queueing theory, observational and researched behavioural considerations barely get mentioned throughout the Stage 3 documentation.

What is mentioned though, is the consequence of not considering other matters. Most notably, the EDG Energy assertion that the B1122 may be used in the event of the Theberton Bypass or (if applicable) EDF Energy's Sizewell Link not being passable.

11.2.3 KcCPC note the content of the paragraph

KcCPC note that "all park and ride buses and HGVs to use the Theberton bypass..." and seek confirmation this means any vehicle categorised as an HGV in UK regulations and any vehicle configured as a bus (irrespective of size) and used to transport members of the Sizewell workforce, visitors and contractors to and from either of EDF Energy's Park and Ride sites (or other EDF Energy remote locations).

Moreover, KcCPC would like to see evidence (within any application for a development order) that, management control processes and suitable technologies are to be deployed to monitor, police and enforce compliance by vehicle drivers.

11.2.4 KcCPC note the content of the paragraph

KcCPC note the omission of compulsion to use the Theberton bypass, when applied to construction workers.

KcCPC note EDF Energy's reference to "...EDF Energy would expect construction workers to use the route..." and point out that EDF Energy's currently woeful car sharing ambitions could make a substantial difference if lifted to a minimum of 3 people sharing a car and traversing the Theberton bypass, in order to gain access to Main Site parking.

### 11.3 Environmental considerations

11.3.1 KcCPC note the content of the paragraph

11.3.2 KcCPC note the content of the paragraph

KcCPC note that the environmental considerations have not been progressed to sufficient enough a degree that EDF Energy can confirm the viability of proposed route.

KcCPC note the intention of EDF Energy (were it necessary) to utilise the Theberton bypass as an HGV holding area, when access to the construction site is not possible, diverting other traffic through Theberton on the B1122.

In light of this KcCPC believes it essential that a full environment impact analysis should be available prior to an application for a development order, describing the impact in Theberton (and the surrounding area), of

- a standing HGV column on the Theberton bypass combined with...
- ...a re-routed traffic mixed traffic flow moving (in both directions) through Theberton on the B1122



11.3.3 KcCPC note the content of the paragraph

11.3.4 KcCPC note the content of the paragraph

11.3.5 KcCPC note the content of the paragraph

Whilst KcCPC note EDF Energy's intent to protect "The Suffolk Coast & Heath AONB and SLA were considered as part of the desk-based analysis of the Theberton Bypass route." and that "All of the possible highway routes lie outside of these landscape designations...", it is concerned (in advance of the EIA), lest EDF Energy give or are given the impression that all other land is of lesser standing and thereby expendable!

KcCPC wish to remind EDF Energy that the Suffolk Coastal area is a valued and important tourism asset, not just because of the attributed assets (i.e. AONB, SSSI, etc.), but also because of the overall settings in which they exist and the 'rural' nature of the towns, villages and communities.

Consequently, it is not only the construction of Sizewell C that matters to KcCPC, but also the subsequent impacts and how quickly the locality can recover.

KcCPC respectfully remind EDF Energy that they too attach some value to the 'rural' nature of the area, as evidenced in their avowed intent to narrow the Sizewell C main access road, post construction and give it the feel of a 'country road'.

11.3.6 KcCPC note the content of the paragraph

KcCPC note the proposed disruption to many PRoW (another tourism asset) resulting from the EDF Energy proposal. Including; noise levels, changes to or/loss of views, habitat changes, etc. – potentially accompanied by increased pollution and reduced air quality, dependent on the diversionary PRoW proposals.

Equally, KcCPC note the absence of any significant proposals for alternative arrangement and/or routing of impacted PRoWs within the Stage 3 consultation documents.

11.3.7 KcCPC note the content of the paragraph

KcCPC note EDF Energy's appreciation of the land comprising the proposed route and that it is "...formed from a series of rolling valley sides." with the land being predominantly in use as "arable farmland, with well-defined hedgerow field boundaries, interspersed with scattered woodlands and copses."

#### 11.4 Justification for route selected

11.4.1 KcCPC note the content of the paragraph and Figure 11.1

11.4.2 KcCPC note the content of the paragraph

11.4.3 KcCPC note the content of the paragraph

KcCPC note that the proposed "...route was subject to **desk-based analysis** and **a site visit** to determine the environmental effects." and are unconvinced of the soundness of the proposal based on the complexity of the site and extent of the proposed area being considered.

11.4.4 KcCPC note the content of the paragraph

KcCPC note that "There is potential for the significance of some heritage assets to be adversely affected by the scheme due to changes in their setting resulting from the scheme but this is likely to be limited.", but note the lack of tangible objective evidence to support this assertion.

Moreover, KcCPC note the observation that "at Anneson's Cottages and Valley Farm there is a potential to cause **significant effects** on the amenity of residents. Effects on the existing road network are also likely to be minimal, although a number of PRoWs would be bisected and adequate provisions would need to be

provided.” despite the prior sentence maintaining “Elsewhere the route is generally positioned away from existing properties with minimal effect...”!

## **11.5 Proposed development**

### **a) Route description**

**11.5.1** KcCPC note the content of the paragraph

KcCPC particularly note the proposal for the route to have a 50mph design speed (see 11.1.5 above)

**11.5.2** KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note the incomplete nature of the proposals being put forward at Stage 3 consultation and the lack of preparedness of EDF Energy's plan with regard to landowner consultations vis-à-vis access to retained land.

KcCPC note the proposal promotes the use of a 'ghost island' junction at the B1125 and wonder whether this provides the most suitable type of junction, particularly as the traffic volume after the B1125 would indicate that 'flow crossing' may be considerable from the B1122 to the B1125.

**11.5.3** KcCPC note the content of the paragraph

**11.5.4** KcCPC note the content of the paragraph

**11.5.5** KcCPC note the content of the paragraph

**11.5.6** KcCPC note the content of the paragraph

KcCPC note that the environmental considerations have not been progressed to sufficient enough a degree that EDF Energy can confirm the viability of proposed route.

### **b) Earthworks**

**11.5.7** KcCPC note the content of the paragraph

KcCPC note the EDF Energy outline route plan for construction traffic at 11.6.5 (below)

KcCPC note EDF Energy do not describe how and where 25,900 cubic metres of material will be disposed of, nor any (if at all) additional HGV movements arising as a consequence.

### **c) Surface water**

**11.5.8** KcCPC note the content of the paragraph

KcCPC note EDF Energy has yet to consult the Local Flood Authority (SCC) and/or Environment Agency in respect to surface water.

**11.5.9** KcCPC note the content of the paragraph

KcCPC note EDF Energy does not mention integral measures for ensuring surface water arrangements are free from contaminants (i.e. petrol, diesel, agricultural chemicals, noxious materials, etc.).

KcCPC note EDF Energy has not yet completed geotechnical testing along the proposed route.

**11.5.10** KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note that drainage retention and filtration areas indicative pending geotechnical testing.

**d) Vehicle restraint systems**

11.5.11 KcCPC note the content of the paragraph

KcCPC note that the EDF Energy proposal is not advanced to a degree that EDF Energy feel able to determine any vehicle restraint arrangements at present.

**e) Rights of Way**

11.5.12 KcCPC note the content of the paragraph, Figure 11.2 and Figure 11.3

KcCPC note that the EDF Energy proposal is not advanced to a degree that EDF Energy feel able to assess or determine an appropriate solution for any PRow impacted by the proposed route.

KcCPC note that EDF Energy intend to seek the assistance of SCC and SCDC (or its successor – East Suffolk) in finding suitable arrangements (i.e. stile, gate, diversion, etc.), prior to any submission of an application for development consent.

**f) Lighting**

11.5.13 KcCPC note the content of the paragraph

11.5.14 KcCPC note the content of the paragraph

KcCPC note the EDF Energy proposals to light three junctions on the route of the proposed Theberton bypass and regard the views of the appropriate highway authority, in consultation with Theberton Parish Council, residents and businesses to determine the efficacy of EDF Energy's proposal.

11.5.15 KcCPC note the intent of EDF Energy to adopt a highway lighting design standard, which implies lighting columns of (typically) 10m in height, and questions whether this is in keeping with the immediate surroundings and/or necessary?

11.5.16 KcCPC note the content of the paragraph

**g) Improvement west of the junction with Mill Street**

11.5.17 KcCPC note the content of the paragraph

11.5.18 KcCPC note the content of the paragraph

**11.6 Construction of Theberton bypass**

11.6.1 KcCPC note the content of the paragraph

11.6.2 KcCPC note the content of the paragraph

KcCPC note the EDF Energy outline timeline that indicates "Theberton bypass would be built during the early years..." and "...would take about 12 months to build." but would only "...be completed and opened to use before Sizewell C construction traffic reaches a peak in 2027."

11.6.3 KcCPC note the content of the paragraph

11.6.4 KcCPC note the content of the paragraph and Figure 11.2

11.6.5 KcCPC note the content of the paragraph

11.6.6 KcCPC note the content of the paragraph

## 11.7 Operation of the Theberton bypass

11.7.1 KcCPC note the content of the paragraph

KcCPC note the assertion at 11.7.1 that:

“On a typical day at peak construction in 2027, the forecast traffic flows on Theberton bypass **are 8,850 vehicles** per day to the east of the B1125 junction...”

This contradicts an assertion made at 10.9.2 that:

“On a typical day at peak construction in 2027, the predicted traffic flows on Sizewell link road **are 9,650 vehicles** per day to the east of the B1125 junction...”

KcCPC assume that EDF Energy attribute this variance as being the HGV difference between a Road-led Peak at 10.9.2 and the Rail-Led Peak at 11.7.1.

However, a variance of 800 vehicles/movements equates to 400 HGV deliveries, when the forecast difference between Peak loadings, as described in Table 6.1 is either:

	Road-Led	Rail-Led	Variance
<b>Typical</b>	750	450	300 movements 150 deliveries
<b>Busiest day</b>	1,500	900	600 movements 300 deliveries

So, if this is not the reason for the variation, it is KcCPC's belief that the opaqueness of the underpinning Traffic Analysis provided by EDF Energy in the Stage 3 consultation, is designed to fog the unsound nature and sustainability of EDF Energy's forecast construction traffic volumes along the A12 route and the EDF Energy proposed Sizewell Link road.

## **12 Two Village Bypass (Volume 1, Pages 332 to 340)**

### **12.1 Introduction**

12.1.1 KcCPC note the content of the paragraph

12.1.2 KcCPC note the content of the paragraph

12.1.3 KcCPC note the content of the paragraph

KcCPC is clear that it is for the Farnham and Stratford St Andrew Parish Councils, the residents and businesses of the Parishes to determine where the proposals being brought forward by EDF Energy are suitable and advantageous mitigations for the potential damage to the built environment, health and well-being of the village. It is anticipated that Farnham and Stratford St Andrew may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed bypass and ancillary works.

12.1.4 KcCPC note the content of the paragraph

### **12.2 Scheme requirements**

12.2.1 KcCPC note the content of the paragraph

12.2.2 KcCPC note the content of the paragraph

12.2.3 KcCPC note the content of the paragraph

12.2.4 KcCPC note the content of the paragraph

12.2.5 KcCPC note the content of the paragraph

### **12.3 Overview of feedback and response to consultation**

#### **a) Introduction**

12.3.1 KcCPC note the content of the paragraph

12.3.2 KcCPC note the content of the paragraph

#### **b) Overview of feedback from the Stage 2 consultation and response to consultation**

12.3.3 KcCPC note the content of the paragraph

KcCPC note particularly "...others opposed improvements because of their impact on the environment and the rural feel of the local area. Some respondents opposed all the proposed options because they were concerned that none of the options adequately address traffic congestion or would result in traffic problems being moved to another location rather than mitigated."

12.3.4 KcCPC note the content of the paragraph

12.3.5 KcCPC note the content of the paragraph

KcCPC note particularly "...respondents expressed the view that Option 4 was the preferable option, although they would prefer a more extensive, four village bypass."

12.3.6 KcCPC note the content of the paragraph

12.3.7 KcCPC note the content of the paragraph

KcCPC note particularly "A significant number of respondents expressed support for a four village bypass as an alternative option."

12.3.8 KcCPC note the content of the paragraph and Table 12.1

12.3.9 KcCPC note the content of the paragraph

KcCPC note particularly:

"...something does need to be done to address the existing position in Farnham...the congestion caused by conflicting traffic at the bend is unacceptable in itself and creates a delivery risk for the Sizewell C project"

"...to recognise the significant impact of the Sizewell C traffic during the construction phase – particularly the increase in problematic HGV movements – EDF Energy accepts that it is appropriate to propose a scheme of mitigation"

"...for the reasons explained in our Stage 2 consultation and also in section 12.6 of this chapter, we consider that it would not be proportionate or necessary for EDF Energy to develop a four-village bypass."

12.3.10 KcCPC note the content of the paragraph

#### **c) Transport**

12.3.11 KcCPC note the content of the paragraph

KcCPC note particularly "...the Stage 2 feedback about the A12 proposals related to the existing and expected traffic levels and the knock-on effects of traffic including noise and air pollution, safety concerns and effects on the environment."

12.3.12 KcCPC note the content of the paragraph

12.3.13 KcCPC note the content of the paragraph

KcCPC note particularly "...Some respondents suggested that, in relation to the two-village bypass, improved traffic flow through or around Farnham and Stratford St Andrew would create congestion at Yoxford." and are familiar with the potential Yoxford impact described, as being one of the unforeseen consequences described in 'queueing theory' research.

However, EDF Energy's view is "...there is no evidence to suggest that additional traffic would pass through Yoxford as a result of the two village bypass..."

12.3.14 KcCPC note the content of the paragraph

KcCPC note particularly "Some respondents expressed concerns about the estimates or assumptions used in the modelling for the proposals."

12.3.15 KcCPC note the content of the paragraph

KcCPC note particularly "A single village option was developed and tested at Stage 2 but it would have significant impacts" but EDF Energy omit to include details of the "...significant impacts..." that arose!

#### **d) Environmental and socio-economic considerations**

12.3.16 KcCPC note the content of the paragraph

12.3.17 KcCPC note the content of the paragraph

12.3.18 KcCPC note the content of the paragraph

12.3.19 KcCPC note the content of the paragraph

12.3.20 KcCPC note the content of the paragraph

12.3.21 KcCPC note the content of the paragraph

KcCPC note EDF Energy "continue to discuss the proposals with landowners and local residents to develop a scheme that strikes the right balance between the primary route function of the A12 and local connectivity."

12.3.22 KcCPC note the content of the paragraph

KcCPC note EDF Energy's response to local concerns on the environmental impacts was "In our view, the environmental effects of a two-village bypass can be limited and mitigated to an acceptable level through good design."

12.3.23 KcCPC note the content of the paragraph

#### **12.4 Scheme description**

12.4.1 KcCPC note the content of the paragraph

12.4.2 KcCPC note the content of the paragraph

KcCPC note the intention to run the route "through the floodplain to the south of the existing A12."

12.4.3 KcCPC note the content of the paragraph and Figure 12.1

#### **12.5 Proposed development**

12.5.1 KcCPC note the content of the paragraph

12.5.2 KcCPC note the content of the paragraph

KcCPC note the intention to "...consult with all affected landowners to inform the ongoing design process for the two-village bypass."

12.5.3 KcCPC note the content of the paragraph

KcCPC note that the "...eastern roundabout has been relocated from the A12/A1094 Friday Street junction so that it can largely be built off-line to minimise traffic management requirements and potential disruption to A12 and A1094 traffic flows during construction"

##### **a) General arrangement overview**

12.5.4 KcCPC note the content of the paragraph and Figure 12.1

12.5.5 KcCPC note the content of the paragraph

12.5.6 KcCPC note the content of the paragraph

12.5.7 KcCPC note the content of the paragraph and Figure 12.1

##### **b) Access**

12.5.8 KcCPC note the content of the paragraph and Figure 12.2

12.5.9 KcCPC note the content of the paragraph

12.5.10 KcCPC note the content of the paragraph

**c) Buildings, structures and lighting**

12.5.11 KcCPC note the content of the paragraph

12.5.12 KcCPC note the content of the paragraph

12.5.13 KcCPC note the content of the paragraph

KcCPC note with much regret that EDF Energy propose to light both roundabouts, seemingly reinforcing the oft spoken view that EDF Energy's legacy to Coastal Suffolk will be **light pollution**, as is evident at Hinkley Point C where the construction 'glow dome' is visible 4 miles away as the crow flies, 8 miles by road.

12.5.14 KcCPC note the content of the paragraph

KcCPC note with regard to the proposed lighting that EDF Energy propose using 10m lighting columns

12.5.15 KcCPC note the content of the paragraph

**d) Landscaping and drainage**

12.5.16 KcCPC note the content of the paragraph and Figure 12.1

**e) Construction**

12.5.17 KcCPC note EDF Energy have "no intention to drain the bypass to any local drainage outside of the River Alde." but do not advise the safeguarding measures that are being taken to avoid fuel spillages, noxious liquids, etc. entering the water course and the River Alde.

12.5.18 KcCPC note the content of the paragraph and Figure 12.1

12.5.19 KcCPC note the content of the paragraph

KcCPC note the fill deficit, and have also noted the surplus fill resulting from the Theberton bypass. Does EDF Energy have any proposals in this regard?

**f) Operation and post operation**

12.5.20 KcCPC note the content of the paragraph

KcCPC note EDF Energy "anticipate that the two village bypass would be operational from 2024...", three years prior to the Theberton bypass!

12.5.21 KcCPC note the content of the paragraph

**12.6 Four village bypass**

12.6.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's assertion that "Many respondents called for the construction of the four-village bypass to the exclusion of other options." but once again fail to quantify or evidence the assertion.

12.6.2 KcCPC note the content of the paragraph

12.6.3 KcCPC note the content of the paragraph



12.6.4

KcCPC note that EDF Energy "...supports the principle of the four-village bypass scheme where we can be satisfied that it would be delivered in an appropriate timeframe for the Sizewell C development. Therefore, EDF Energy is currently continuing to work with SCC to see if such a scheme can be supported."

**13 Northern Park and Ride** (Volume 1, Pages 341 to 349)

**13.1 Introduction**

13.1.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's claim that "Opportunities have been sought to limit and mitigate the traffic and traffic-related effects of moving goods and people..." yet KcCPC once again note EDF Energy's woeful car sharing ambitions that could make a substantial difference to the unnecessarily high number of car movements. If EDF Energy were to lift the ambition to a minimum of 3 people sharing a car, in order to gain access to Main Site parking numbers would undoubtedly tumble.

13.1.2 KcCPC note the content of the paragraph

13.1.3 KcCPC note the content of the paragraph

13.1.4 KcCPC note the content of the paragraph

13.1.5 KcCPC note the content of the paragraph

13.1.6 KcCPC note the content of the paragraph

**13.2 Scheme requirements**

13.2.1 KcCPC note the content of the paragraph

13.2.2 KcCPC note the content of the paragraph and Figure 13.2

13.2.3 KcCPC note the content of the paragraph

13.2.4 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention for the site to be available 20 hours per day (05:00 to 01:00), every day

13.2.5 KcCPC note the content of the paragraph

13.2.6 KcCPC note the content of the paragraph

**13.3 Site description**

13.3.1 KcCPC note the content of the paragraph

13.3.2 KcCPC note the content of the paragraph and Figure 13.2

13.3.3 KcCPC note the content of the paragraph

13.3.4 KcCPC note the content of the paragraph

13.3.5 KcCPC note the content of the paragraph

13.3.6 KcCPC note the content of the paragraph

**13.4 Site description**

**a) Introduction**

13.4.1 KcCPC note the content of the paragraph

13.4.2 KcCPC note the content of the paragraph and Figure 13.2

13.4.3 KcCPC note the content of the paragraph

**b) Overview of feedback from the Stage 2 consultation and response to consultation**

13.4.4 KcCPC note the content of the paragraph

13.4.5 KcCPC note the content of the paragraph

13.4.6 KcCPC note the content of the paragraph

13.4.7 KcCPC note the content of the paragraph

13.4.8 KcCPC note the content of the paragraph and Table 13.1

13.4.9 KcCPC note the content of the paragraph

**c) Transport**

13.4.10 KcCPC note the content of the paragraph

13.4.11 KcCPC note the content of the paragraph

13.4.12 KcCPC note the content of the paragraph

13.4.13 KcCPC note the content of the paragraph and Figure 13.2

13.4.14 KcCPC note the content of the paragraph

13.4.15 KcCPC note the content of the paragraph

**d) Environmental considerations**

13.4.16 KcCPC note the content of the paragraph

13.4.17 KcCPC note the content of the paragraph

13.4.18 KcCPC note the content of the paragraph

13.4.19 KcCPC note the content of the paragraph

**e) Socio-economic**

13.4.20 KcCPC note the content of the paragraph

13.4.21 KcCPC note the content of the paragraph

13.4.22 KcCPC note the content of the paragraph

13.4.23 KcCPC note the content of the paragraph

13.4.24 KcCPC note the content of the paragraph

**f) Construction and operational requirements**

13.4.25 KcCPC note the content of the paragraph

### **13.5 Proposed development**

13.5.1 KcCPC note the content of the paragraph

13.5.2 KcCPC note the content of the paragraph

13.5.3 KcCPC note the content of the paragraph

#### **a) General arrangement overview**

13.5.4 KcCPC note the content of the paragraph

13.5.5 KcCPC note the content of the paragraph and Figure 13.2

13.5.6 KcCPC note the content of the paragraph

13.5.7 KcCPC note the content of the paragraph

#### **b) Access**

13.5.8 KcCPC note the content of the paragraph and Figure 13.2

13.5.9 KcCPC note the content of the paragraph

13.5.10 KcCPC note the content of the paragraph

13.5.11 KcCPC note the content of the paragraph

#### **c) Buildings, structures and lighting**

13.5.12 KcCPC note the content of the paragraph

13.5.13 KcCPC note the content of the paragraph

KcCPC is concerned that lighting on site be kept to a minimum, but enough for adequate security and personal safety. And that in doing so, downlighting from low level columns or stub posts predominate to minimise any light spill.

13.5.14 KcCPC note the content of the paragraph

#### **d) Landscaping and drainage**

13.5.15 KcCPC note the content of the paragraph and Figure 13.2

KcCPC note absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class).

13.5.16 KcCPC note the content of the paragraph

13.5.17 KcCPC note the content of the paragraph

KcCPC welcome the early publication of EDF Energy's 'Park and Ride Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

**e) Construction**

13.5.18 KcCPC note the content of the paragraph

KcCPC note EDF Energy expect "that construction work for this facility would take place over a period of approximately 12 months." yet give no 'in service' date.

13.5.19 KcCPC note the content of the paragraph

13.5.20 KcCPC note the content of the paragraph

**f) Operation**

13.5.21 KcCPC note the content of the paragraph

13.5.22 KcCPC note the content of the paragraph

13.5.23 KcCPC note the content of the paragraph

13.5.24 KcCPC note the content of the paragraph

13.5.25 KcCPC note the content of the paragraph

13.5.26 KcCPC note the content of the paragraph

13.5.27 KcCPC note the content of the paragraph

13.5.28 KcCPC note the content of the paragraph

**g) Removal and reinstatement**

13.5.29 KcCPC note the content of the paragraph

**14 Southern Park and Ride** (Volume 1, Pages 350 to 362)

**14.1 Introduction**

14.1.1 KcCPC note the content of the paragraph

KcCPC note EDF Energy's claim that "Opportunities have been sought to limit and mitigate the traffic and traffic-related effects of moving goods and people..." yet KcCPC once again note EDF Energy's woeful car sharing ambitions that could make a substantial difference to the unnecessarily high number of car movements. If EDF Energy were to lift the ambition to a minimum of 3 people sharing a car, in order to gain access to Main Site parking numbers would undoubtedly tumble.

14.1.2 KcCPC note the content of the paragraph

14.1.3 KcCPC note the content of the paragraph

14.1.4 KcCPC note the content of the paragraph

14.1.5 KcCPC note the content of the paragraph

14.1.6 KcCPC note the content of the paragraph

14.1.7 KcCPC note the content of the paragraph

**14.2 Scheme requirements**

14.2.1 KcCPC note the content of the paragraph

14.2.2 KcCPC note the content of the paragraph

14.2.3 KcCPC note the content of the paragraph

14.2.4 KcCPC note the content of the paragraph

KcCPC note EDF Energy's intention for the site operation between 05:00 and 01:00, seven days per week

14.2.5 KcCPC note the content of the paragraph

14.2.6 KcCPC note the content of the paragraph

**14.3 Site description**

14.3.1 KcCPC note the content of the paragraph and Figure 14.2

14.3.2 KcCPC note the content of the paragraph

14.3.3 KcCPC note the content of the paragraph

14.3.4 KcCPC note the content of the paragraph

14.3.5 KcCPC note the content of the paragraph

14.3.6 KcCPC note the content of the paragraph

14.3.7 KcCPC note the content of the paragraph

#### **14.4 Overview of feedback and response to consultation**

##### **a) Introduction**

14.4.1 KcCPC note the content of the paragraph

14.4.2 KcCPC note the content of the paragraph

14.4.3 KcCPC note the content of the paragraph

14.4.4 KcCPC note the content of the paragraph

14.4.5 KcCPC note the content of the paragraph

14.4.6 KcCPC note the content of the paragraph

##### **b) Overview of feedback from the Stage 2 consultation and response to consultation**

14.4.7 KcCPC note the content of the paragraph

14.4.8 KcCPC note the content of the paragraph

14.4.9 KcCPC note the content of the paragraph

14.4.10 KcCPC note the content of the paragraph

14.4.11 KcCPC note the content of the paragraph

14.4.12 KcCPC note the content of the paragraph

14.4.13 KcCPC note the content of the paragraph

14.4.14 KcCPC note the content of the paragraph

14.4.15 KcCPC note the content of the paragraph

14.4.16 KcCPC note the content of the paragraph

14.4.17 KcCPC note the content of the paragraph

14.4.18 KcCPC note the content of the paragraph

14.4.19 KcCPC note the content of the paragraph

14.4.20 KcCPC note the content of the paragraph and Table 14.1

14.4.21 KcCPC note the content of the paragraph

##### **c) Transport**

14.4.22 KcCPC note the content of the paragraph

14.4.23 KcCPC note the content of the paragraph

14.4.24 KcCPC note the content of the paragraph

14.4.25 KcCPC note the content of the paragraph

14.4.26 KcCPC note the content of the paragraph

14.4.27 KcCPC note the content of the paragraph, Figure 14.2 and 14.3

**d) Environmental considerations**

14.4.28 KcCPC note the content of the paragraph

14.4.29 KcCPC note the content of the paragraph

14.4.30 KcCPC note the content of the paragraph

14.4.31 KcCPC note the content of the paragraph

14.4.32 KcCPC note the content of the paragraph

14.4.33 KcCPC note the content of the paragraph

14.4.34 KcCPC note the content of the paragraph

14.4.35 KcCPC note the content of the paragraph

**e) Socio-economic**

14.4.36 KcCPC note the content of the paragraph

14.4.37 KcCPC note the content of the paragraph

**f) Construction and operational requirements**

14.4.38 KcCPC note the content of the paragraph

14.4.39 KcCPC note the content of the paragraph

14.4.40 KcCPC note the content of the paragraph

**14.5 Proposed development**

14.5.1 KcCPC note the content of the paragraph

14.5.2 KcCPC note the content of the paragraph

14.5.3 KcCPC note the content of the paragraph

**a) General arrangement overview**

14.5.4 KcCPC note the content of the paragraph

14.5.5 KcCPC note the content of the paragraph and Figure 14.2

14.5.6 KcCPC note the content of the paragraph

14.5.7 KcCPC note the content of the paragraph

14.5.8 KcCPC note the content of the paragraph



**b) Access**

- 14.5.9 KcCPC note the content of the paragraph and Figure 14.2
- 14.5.10 KcCPC note the content of the paragraph
- 14.5.11 KcCPC note the content of the paragraph and Figure 14.2
- 14.5.12 KcCPC note the content of the paragraph
- 14.5.13 KcCPC note the content of the paragraph and Figures 14.4-14.6
- 14.5.14 KcCPC note the content of the paragraph

**c) Buildings, structures and lighting**

- 14.5.15 KcCPC note the content of the paragraph
- 14.5.16 KcCPC note the content of the paragraph

KcCPC is concerned that lighting on site be kept to a minimum, but enough for adequate security and personal safety. And that in doing so, downlighting from low level columns or stub posts predominate to minimise any light spill.

- 14.5.17 KcCPC note the content of the paragraph

**d) Landscaping and drainage**

- 14.5.18 KcCPC note the content of the paragraph and Figure 14.2

KcCPC note absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class). KcCPC note the increased importance of these provisions given the potential use of part of the Park and Ride site for HGV lay-up in the event of a Traffic Incident and/or A12 closure.

- 14.5.19 KcCPC note the content of the paragraph
- 14.5.20 KcCPC note the content of the paragraph
- 14.5.21 KcCPC note the content of the paragraph

KcCPC welcome the early publication of EDF Energy's 'Park and Ride Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as a parking facility) to return the land to a greenfield (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

**e) Construction**

- 14.5.22 KcCPC note the content of the paragraph

KcCPC note EDF Energy expect "that construction work for this facility would take place over a period of approximately 12-18 months." yet give no 'in service' date.

- 14.5.23 KcCPC note the content of the paragraph
- 14.5.24 KcCPC note the content of the paragraph

**f) Operation**

14.5.25 KcCPC note the content of the paragraph

14.5.26 KcCPC note the content of the paragraph

14.5.27 KcCPC note the content of the paragraph

14.5.29 KcCPC note the content of the paragraph

14.5.30 KcCPC note the content of the paragraph

14.5.31 KcCPC note the content of the paragraph

14.5.32 KcCPC note the content of the paragraph

14.5.33 KcCPC note the content of the paragraph

14.5.34 KcCPC note the content of the paragraph

**g) Removal and reinstatement**

14.5.35 KcCPC note the content of the paragraph

14.5.36 KcCPC note the content of the paragraph

## **15 Freight Management Facilities (Volume 1, Pages 363 to 368)**

### **15.1 Introduction**

#### **15.1.1** KcCPC note the content of the paragraph

KcCPC note EDF Energy's avowed intent "...to deliver the Sizewell C project so that adverse transport effects on the environment and local communities are limited through mitigation, in advance of impacts being felt..." and in that connection welcome in principal the professional marshalling of HGV traffic, prior to it going north on the A12.

The A12 is the only primary north-south route in the Suffolk Coastal area and is a de-trunked road comprising; several stretches of single carriageway, many roundabouts, incidences of uncontrolled cross flow turning, peak time congestion, and other more esoteric problematic attributes.

#### **15.1.2** KcCPC note the content of the paragraph

KcCPC note EDF Energy in developing their transport strategy have "...sought to take account of the nature of the local highway network in the development and design of its proposals. We have sought opportunities to limit the traffic and traffic-related effects of moving freight using nonroad based transport where feasible...".

#### **15.1.3** KcCPC note the content of the paragraph

KcCPC note EDF Energy are bringing forward two proposals at Stage 3 and broadly welcome the proposal to operate a Freight Management Facility.

However, having accumulated knowledge and experience of the A12 over many decades (both as residents, business operators and in some cases freight handlers), members of KcCPC believes that irrespective of which proposal forms the basis on an application for a development order, a Freight Management Facility will be essential.

Moreover, KcCPC believes that similar marshalling and release controls will be necessary at the Sizewell C Main construction site if the southbound A12 and A14 J58 westbound are to continuing operating without crippling congestion.

KcCPC also note that despite potentially dealing with 15% of the projected inbound (and outbound?) HGV traffic, the A12 northbound from the B1122 seemingly lacks any marshalling or control mechanisms, unless that is, a DMS system is adjudged by EDF Energy as a competent proxy for a FMF?

#### **15.1.4** KcCPC note the content of the paragraph and Figure 15.1

KcCPC note EDF Energy have two identified potential Freight Management Facilities on which they would like receive views, the first being:

- Seven Hills – 9.9ha site accessed by a left turn from the (Old) Felixstowe Road

The second being

- Innocence Farm - 115ha site to the north of the A14, accessed by a left turn

KcCPC comments are made in response to individual paragraphs of this chapter.

#### **15.1.5** KcCPC note the content of the paragraph and Figure 15.1

## **15.2 Scheme requirements**

15.2.1 KcCPC note the content of the paragraph

15.2.2 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class). KcCPC note the increased importance of these provisions given the potential use marshalling and for HGV lay-up in the event of a Traffic Incident and/or A14 closure. KcCPC note during the construction phase 'spill kits' specified, but these do not appear to have improved upon or been carried across to operation.

In addition, KcCPC would welcome the early publication of EDF Energy's 'FMF Demolition and Restoration Plans' and understanding the extent of groundworks to be undertaken to ensure that the chosen site meets all necessary remediation standards (after extended use as a marshalling facility) to return the land to greenfield agricultural land (i.e. Diesel spills, seepage, pollution and construction materials recovery, etc.).

## **15.3 Overview of feedback and response to consultation**

### **a) Stage 1 consultation feedback**

15.3.1 KcCPC note the content of the paragraph

15.3.2 KcCPC note the content of the paragraph

15.3.3 KcCPC note the content of the paragraph

15.3.4 KcCPC note the content of the paragraph

15.3.5 KcCPC note the content of the paragraph

### **b) Stage 2 consultation feedback**

15.3.6 KcCPC note the content of the paragraph

15.3.7 KcCPC note the content of the paragraph

15.3.8 KcCPC note the content of the paragraph

15.3.9 KcCPC note the content of the paragraph

15.3.10 KcCPC note the content of the paragraph

### **c) Response to consultations**

15.3.11 KcCPC note the content of the paragraph

15.3.12 KcCPC note the content of the paragraph

15.3.13 KcCPC note the content of the paragraph

KcCPC note that EDF Energy acknowledge it necessary to "...intercept longer distance HGV traffic before they enter the more restricted lengths of the A12."

15.3.14 KcCPC note the content of the paragraph

15.3.15 KcCPC note the content of the paragraph

KcCPC note that EDF Energy "...have taken account of the first draft Suffolk Coastal Local Plan..."

15.3.16 KcCPC note the content of the paragraph

#### 15.4 Site option descriptions and proposed development

15.4.1 KcCPC note the content of the paragraph and Figure 15.1

##### a) Option 1: A12/A14 Seven Hills site

Site description

15.4.2 KcCPC note the content of the paragraph

KcCPC note the site description but are unclear of the access egress route being proposed either:

Access

- A14 J58, onto A1156
- Past Crematorium
- Left onto (Old) Felixstowe Road
- Left into FMF

Or

- Eastbound A14 J59 to Trimley St Martin roundabout
- Circulate roundabout
- Westbound A14
- Access (Old) Felixstowe Road to left
- Right into FMF crossing flow

Egress

- Right from FMF, crossing over flow
- Right onto A1156, crossing flow
- Past crematorium to A14 J58 roundabout

Or

- Left from FMF along (Old) Felixstowe Road
- Left onto A14 Westbound at High Road (or prior?)

15.4.3 KcCPC note the content of the paragraph

15.4.4 KcCPC note the content of the paragraph

KcCPC note the potential presence of bat roosts bordering the site and await details of EDF Energy's lighting plan in the event these are confirmed.

15.4.5 KcCPC note the content of the paragraph

KcCPC note the SCDC Local Plan categorises the site as 'Countryside'

15.4.6 KcCPC note the content of the paragraph

15.4.7 KcCPC note the content of the paragraph

15.4.8 KcCPC note the content of the paragraph

Proposed Development

15.4.9 KcCPC note the content of the paragraph and Figure 15.2

KcCPC note that EDF Energy do not indicate how waste from the on-site toilet and rest room. Should this site be confirmed as EDF Energy's proposed location, KcCPC look forward to the details accompanying any application for a development order.

15.4.10 KcCPC note the content of the paragraph

15.4.11 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class) and/or the cumulative impacts of small or minor losses of diesel, petrol or noxious liquids over the lifetime of the Freight Management Facility.

15.4.12 KcCPC note the content of the paragraph

KcCPC note the potential presence of bat roosts bordering the site and await details of EDF Energy's lighting plan in the event these are confirmed.

15.4.13 KcCPC note the content of the paragraph

15.4.14 KcCPC note the content of the paragraph

KcCPC note no indication of;

- anticipated construction HGV movements
- anticipated effectiveness date

15.4.15 KcCPC note the content of the paragraph

KcCPC note the operational hours are expected to be;

- 7.5 hours a day – 5 days a week up to a maximum of
- 24 hours a day – seven days a week

KcCPC presume (from the phrasing of this paragraph) what EDF Energy are actually seeking is a total 365-day flexible plan.

As a consequence, KcCPC look forward to a better, more detailed (and evidenced) plan accompanying any application for a development order. date

15.4.16 KcCPC note the content of the paragraph

**b) Option 2: Innocence site**

Site description

15.4.17 KcCPC note the content of the paragraph

KcCPC note the site description and in the absence of a clear indication, assume the access and egress route being proposed to be:

Access

- A14 Eastbound past A14 J58
- Left onto Innocence Lane
- Right into FMF, crossing the A14 bound flow

Egress

- Left from FMF
- Left onto A14 Eastbound
- Take A14 J59
- Circulate the Trimley St Martin roundabout
- Exit roundabout to Westbound A14

15.4.18 KcCPC note the content of the paragraph

15.4.19 KcCPC note the content of the paragraph

15.4.20 KcCPC note the content of the paragraph

KcCPC note the potential for the site (full allocation) to be shared by multiple 'major energy infrastructure project' owners and wonder what co-ordination is being exercised to ensure minimal disruption to residents, businesses and ecology in the immediate and mid-distance areas?

Proposed Development

15.4.21 KcCPC note the content of the paragraph and Figure 15.3

KcCPC note that EDF Energy do not indicate how waste from the on-site toilet and rest room. Should this site be confirmed as EDF Energy's proposed location, KcCPC look forward to the details accompanying any application for a development order.

15.4.22 KcCPC note the content of the paragraph

15.4.23 KcCPC note the content of the paragraph

KcCPC note the absence of any provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from either a parked or moving vehicle (of any vehicular class) and/or the cumulative impacts of small or minor losses of diesel, petrol or noxious liquids over the lifetime of the Freight Management Facility.

15.4.24 KcCPC note the content of the paragraph

15.4.25 KcCPC note the content of the paragraph

15.4.26 KcCPC note the content of the paragraph

KcCPC note no indication of;

- anticipated construction HGV movements
- anticipated effectiveness date

15.4.27 KcCPC note the content of the paragraph

KcCPC note the operational hours are expected to be;

- 7.5 hours a day – 5 days a week up to a maximum of
- 24 hours a day – seven days a week

KcCPC presume (from the phrasing of this paragraph) what EDF Energy are actually seeking is a total 365-day flexible plan.

As a consequence, KcCPC look forward to a better, more detailed (and evidenced) plan accompanying any application for a development order.

15.4.28 KcCPC note the content of the paragraph



**16 Yoxford Roundabout** (Volume 1, Pages 369 to 373)

**16.1 Introduction**

**16.1.1** KcCPC note the content of the paragraph

KcCPC is clear that it is for Yoxford Parish Council, the residents and businesses of the Parish to determine where proposals are being brought forward by EDF Energy, if they are suitable and advantageous mitigations for any potential damage to the built environment, health and well-being of the village. It is assumed that Yoxford may be assisted by experts to determine whether the ecological and everyday environmental damage in their village will be mitigated by the proposed roundabout ancillary works.

**16.1.2** KcCPC note the content of the paragraph

**16.1.3** KcCPC note the content of the paragraph

**16.1.4** KcCPC note the content of the paragraph

**16.1.5** KcCPC note the content of the paragraph

**16.2 Site requirements**

**16.2.1** KcCPC note the content of the paragraph

**16.2.2** KcCPC note the content of the paragraph

**16.3 Site description**

**16.3.1** KcCPC note the content of the paragraph

**16.3.2** KcCPC note the content of the paragraph

**16.4 Overview of feedback and response to consultation**

**a) Introduction**

**16.4.1** KcCPC note the content of the paragraph

**16.4.2** KcCPC note the content of the paragraph

**16.4.3** KcCPC note the content of the paragraph

**b) Overview of feedback from the Stage 2 consultation and response to consultation**

**16.4.4** KcCPC note the content of the paragraph

**16.4.5** KcCPC note the content of the paragraph

**16.4.6** KcCPC note the content of the paragraph

**c) Environmental considerations**

**16.4.7** KcCPC note the content of the paragraph

**16.4.8** KcCPC note the content of the paragraph

**16.4.9** KcCPC note the content of the paragraph

**d) Construction and operational requirements**

16.4.10 KcCPC note the content of the paragraph and Figure 16.1

16.4.11 KcCPC note the content of the paragraph

KcCPC note "abnormal indivisible loads (AILs) bound for Sizewell B or Sizewell C would need to pass through the A12/B1122 Yoxford roundabout since a vehicle of that size could not negotiate the roundabout." but are confused, as seemingly AILs were the justification for the Beach Landing Facility (BLF)?

KcCPC regrettably have to conclude that EDF Energy are being opportunistic and instead of making a decision are effectively 'backing two horses'. Presumably, in the hope that one (probably the one at least monetary cost and most rapidly deployable) meets with little opposition.

**16.5 Proposed development**

16.5.1 KcCPC note the content of the paragraph

16.5.2 KcCPC note the content of the paragraph

KcCPC note the absence of an 'effective' target date, with 'early years' offering little clarity. It seems improbable at Stage 3 that, EDF Energy do not have a fully developed draft project plan with all significant dependencies and interdependencies identified. Consequently, KcCPC can only speculate as to why EDF Energy are unable (or unwilling) to put a milestone plan in the public domain, that just might assuage some local fears?

KcCPC also note that no construction metrics are provided (i.e. HGV movements and workforce).

16.5.3 KcCPC note the content of the paragraph and Figure 16.1

16.5.4 KcCPC note the content of the paragraph and Figure 16.1

16.5.5 KcCPC note the content of the paragraph and Figure 16.2

16.5.6 KcCPC note the content of the paragraph

KcCPC note the intent of EDF Energy to adopt a highway lighting design standard, which implies lighting columns of (typically) 10m in height, and questions whether this is in keeping with the immediate surroundings and/or necessary?

16.5.7 KcCPC note the content of the paragraph

KcCPC note the absence of provisions to deal effectively with the impacts of a medium to large diesel, petrol or noxious liquid spill from traffic using the newly constructed roundabout, and/or preventing it seeping into the surrounding environment and water course. This type of incident is increasingly likely as a result of the volume of HGV, Bus and LGV's using this route.

16.5.8 KcCPC note the content of the paragraph

See note at 16.5.7 above. KcCPC wonder whether the detention pond could be designed to be utilised for the purpose of collecting 'spillage' from the revised roundabout in the event of an incident?

16.5.9 KcCPC note the content of the paragraph

See note at 16.5.7 and 16.5.8 above

16.5.10 KcCPC note the content of the paragraph

See note at 16.5.2 above

16.5.11 KcCPC note the content of the paragraph

16.5.12 KcCPC note the content of the paragraph

**17 Highway improvements, cycling and rights of way** (Volume 1, Pages 374 to 402)

**17.1 Introduction**

17.1.1 KcCPC note the content of the paragraph

17.1.2 KcCPC note the content of the paragraph

17.1.3 KcCPC note the content of the paragraph

17.1.4 KcCPC note the content of the paragraph

17.1.5 KcCPC note the content of the paragraph

**17.2 Highway improvements**

17.2.1 KcCPC note the content of the paragraph

17.2.2 KcCPC note the content of the paragraph

17.2.3 KcCPC note the content of the paragraph

17.2.4 KcCPC note the content of the paragraph

17.2.5 KcCPC note the content of the paragraph

17.2.6 KcCPC note the content of the paragraph

**17.3 A140/B1078 west of Coddtenham**

**a) Site description**

17.3.1 KcCPC note the content of the paragraph and Figure 17.1

17.3.2 KcCPC note the content of the paragraph

**b) Future conditions in 2022 and 2027 – reference case**

17.3.3 KcCPC note the content of the paragraph

17.3.4 KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

17.3.5 KcCPC note the content of the paragraph

17.3.6 KcCPC note the content of the paragraph

**d) Junction improvements**

17.3.7 KcCPC note the content of the paragraph and Figure 17.2

17.3.8 KcCPC note the content of the paragraph

17.3.9 KcCPC note the content of the paragraph

**17.4 B1078/B1079 east of Easton & Otley College**

**a) Site description**

17.4.1 KcCPC note the content of the paragraph and Figure 17.3

17.4.2 KcCPC note the content of the paragraph

**b) Future conditions in 2022 and 2027 – reference case**

17.4.3 KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

17.4.4 KcCPC note the content of the paragraph

17.4.5 KcCPC note the content of the paragraph

**d) Junction improvements**

17.4.6 KcCPC note the content of the paragraph and Figure 17.4

17.4.7 KcCPC note the content of the paragraph

17.4.8 KcCPC note the content of the paragraph

**17.5 A12/B1119 Saxmundham**

**a) Site description**

17.5.1 KcCPC note the content of the paragraph and Figure 17.5

17.5.2 KcCPC note the content of the paragraph

17.5.3 KcCPC note the content of the paragraph

KcCPC is keen to ensure that EDF Energy give full consideration to this junction in full knowledge that traffic volumes at this junction are subject to significant fluctuations, from three principal causes:

- A]** access and egress to/from Carlton Meres Holiday Park, currently extending further
- B]** A12 crossing flows, West to East and East to West allied to coastal bound holiday traffic/return
- C]** Seasonal events (i.e. Latitude, Folk East, Henham Steam Festival, Motocross, etc.)

This is not an exhaustive list, but indicative of issues evident at the A12/B1119 junction.

**b) Future conditions in 2022 and 2027 – reference case**

17.5.4 KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

17.5.5 KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "...the early years element of Sizewell C construction traffic, traffic flows on the A12 increase by 8% but the junction would still operate with spare capacity...". rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

**17.5.6** KcCPC note the content of the paragraph

KcCPC is concerned at the ostensibly one-dimensional nature of the EDF Energy approach, specifically the apparent obsession (to the exclusion of virtually every other consideration) with road capacity. In this paragraph this manifests itself "...Sizewell C development would increase the traffic at this junction by up to 4% by the peak construction year of 2027. The junction would continue to operate with spare capacity." rather than portraying an interest in and understanding of the potential impacts on communities, residents, etc.

**17.5.7** KcCPC note the content of the paragraph

In light of the assertions at 17.5.5 & 17.5.6 (above), KcCPC is particularly interested to note that "additional traffic generated from Sizewell C construction could exacerbate the identified road safety issues. To minimise this risk, EDF Energy proposes minor safety improvements..."

**d) Junction improvements**

**17.5.8** KcCPC note the content of the paragraph and Figure 17.6

**17.5.9** KcCPC note the content of the paragraph

**17.5.10** KcCPC note the content of the paragraph

KcCPC is doubtful if EDF Energy have any tangible evidence to support the assertion that "EDF Energy expects that these highway improvements would...mitigate the impact of additional Sizewell C traffic on the junction." but would welcome the opportunity to explore with them any evidence they are able to provide.

**17.6 A1094/B1069 south of Knodishall**

**a) Site description**

**17.6.1** KcCPC note the content of the paragraph and Figure 17.7

**17.6.2** KcCPC note the content of the paragraph

**17.6.3** KcCPC note the content of the paragraph

**b) Future conditions in 2022 and 2027 – reference case**

**17.6.4** KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

**17.6.5** KcCPC note the content of the paragraph

**17.6.6** KcCPC note the content of the paragraph

**17.6.7** KcCPC note the content of the paragraph

**d) Junction improvements**

**17.6.8** KcCPC note the content of the paragraph and Figure 17.8

**17.6.9** KcCPC note the content of the paragraph

**17.6.10** KcCPC note the content of the paragraph

**17.7 A12/A1094 Friday Street northeast of Farnham**

17.7.1 KcCPC note the content of the paragraph

**a) Site description**

17.7.2 KcCPC note the content of the paragraph and Figure 17.9

17.7.3 KcCPC note the content of the paragraph

**b) Future conditions in 2022 and 2027 – reference case**

17.7.4 KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

17.7.5 KcCPC note the content of the paragraph

17.7.6 KcCPC note the content of the paragraph

**d) Junction improvements**

17.7.7 KcCPC note the content of the paragraph and Figure 17.10

17.7.8 KcCPC note the content of the paragraph

**17.8 A12/A144 south of Bramfield**

**a) Site description**

17.8.1 KcCPC note the content of the paragraph and Figure 17.11

17.8.2 KcCPC note the content of the paragraph

17.8.3 KcCPC note the content of the paragraph

**b) Future conditions in 2022 and 2027 – reference case**

17.8.4 KcCPC note the content of the paragraph

**c) Future conditions in 2022 and 2027 – including Sizewell C**

17.8.5 KcCPC note the content of the paragraph

**d) Junction improvements**

17.8.6 KcCPC note the content of the paragraph and Figure 17.12

17.8.7 KcCPC note the content of the paragraph

17.8.8 KcCPC note the content of the paragraph

17.8.9 KcCPC note the content of the paragraph

**17.9 Wickham Market diversion route via Valley Road & Easton Road**

17.9.1 KcCPC note the content of the paragraph

17.9.2 KcCPC note the content of the paragraph

**a) Site description**

17.9.3 KcCPC note the content of the paragraph

**b) Highway improvements**

17.9.4 KcCPC note the content of the paragraph and Figures 17.3, 17.4 and 17.5

KcCPC whilst not directly impacted by the proposed changes, are advised that local opinion is opposed the proposals of EDF Energy in totality, and that the Parish Council are bringing forward their own proposals dealing with a number of conjoined issues effecting Wickham Market traffic circulation.

As a consequence, whilst KcCPC notes the content at the Stage 3 consultation, it further reinforces its previously stated view that, it is the local organisations in Wickham Market who should be allowed to express their individual and collective views, prior to any proposal going forward.

17.9.5 KcCPC note the content of the paragraph

17.9.6 KcCPC note the content of the paragraph

17.9.7 KcCPC note the content of the paragraph

17.9.8 KcCPC note the content of the paragraph

17.9.9 KcCPC note the content of the paragraph

17.9.10 KcCPC note the content of the paragraph

17.9.11 KcCPC note the content of the paragraph

**17.10 Mill Street (B1122)**

17.10.1 KcCPC note the content of the paragraph

**a) Site description**

17.10.2 KcCPC note the content of the paragraph

**b) Highway improvements**

17.10.3 KcCPC note the content of the paragraph and Figure 17.6

KcCPC whilst not directly impacted by the proposed changes, as a consequence, whilst KcCPC notes the content at the Stage 3 consultation, it further reinforces its previously stated view that, it is the local organisations who should be allowed to express their individual and collective views, prior to any proposal going forward.

17.10.4 KcCPC note the content of the paragraph

17.10.5 KcCPC note the content of the paragraph

17.10.6 KcCPC note the content of the paragraph



### **17.11 Sizewell C Rights of Way and Open Access Strategy**

**17.11.1** KcCPC note the content of the paragraph and Figures 17.17 and 17.18

#### **17.11.2 a) Construction Phase**

KcCPC note the intended strategic approach of EDF Energy as:

- to minimise physical disturbance of existing rights of way and open access areas including the beach, open access land, the permissive networks and promoted cycle routes;
- to ensure that any necessary alternative routes meet the best interests of the user in respect of directness, safety and quality;
- to retain connectivity, where possible, especially north-south connectivity;
- to minimise disturbance (physical and amenity) to the Suffolk Coast Path, Sandlings Walk, the future England Coast Path and open access on the coast;
- to provide appropriate temporary diversion routes where disturbance or physical closure of routes cannot be avoided; and
- where possible and/or reasonable, to provide mitigation to rights of way, open access land and promoted cycle routes to minimise effects on their amenity.

KcCPC wish to draw EDF Energy's attention to 5 points prior to finalising their strategy, specifically:

- 1]** The area of Coastal Suffolk bounded by the North Sea to the East and the A12 to the West is visited by a great many tourists who take their leisure enjoying the rich variety of countryside and exploiting the network of PRoW.
- 2]** Likewise residents, daily visitors and special interest groups also enjoy the network of the PRoW
- 3]** Two things are common, irrespective of the type of user – one is the connectivity of the network, the second is not whether it is direct (as EDF Energy imply), but that it takes them through rural environments where vista's, flora, fauna and quiet abound.
- 4]** Proprietary and locally produced walk route maps are the most regularly used navigation aids, along with 'word of mouth' or accommodation 'walk sheets'. Consequently, any changes made as a result of Sizewell C will have to be agreed early and communicated widely to ensure visitor and local resident enjoyment of the countryside can continue and that map producers can make the necessary amendments.
- 5]** EDF Energy must also be aware that the PRoW network is also the most direct route to wildlife encounters and be careful in creating new routes or diversions that they do not destroy the very habitats that shelter and support a wide range of mammals, birds, plants and insects, some of which are endangered and many of which are protected. For example, most recently, a small but thriving colony of the Sandy Stiltball were found in Kelsale cum Carlton

#### **b) Operation phase**

KcCPC note the intended strategic approach of EDF Energy as:

- to restore any rights of way within the main development site and open access to the coast that were closed or diverted during construction and seek opportunities for enhancement;
- to seek to improve the amenity and physical condition of the rights of way network and open access on the coast across the EDF Energy estate;

- where possible and/or reasonable, to improve connectivity and linkages through the wider area, especially north south connectivity; and
- where possible and/or reasonable, to improve provision of routes within the EDF Energy estate;

KcCPC would draw EDF Energy's attention the points made above in respect to the Construction phase (above) and ask in seeking to implement their strategy they seek local expertise to advise the degree of 'improve' activity that is undertaken.

17.11.3 KcCPC note the content of the paragraph

#### **17.12 Rights of way and proposed improvements**

##### **a) Existing rights of way**

17.12.1 KcCPC note the content of the paragraph

17.12.2 KcCPC note the content of the paragraph and Figure 17.19

17.12.3 KcCPC note the content of the paragraph

##### **b) Construction**

17.12.4 KcCPC note the content of the paragraph

17.12.5 KcCPC note the content of the paragraph and Figure 17.17

17.12.6 KcCPC note the content of the paragraph

17.12.7 KcCPC note the content of the paragraph

17.12.8 KcCPC note the content of the paragraph

17.12.9 KcCPC note the content of the paragraph and Figure 17.17

17.12.10 KcCPC note the content of the paragraph

17.12.11 KcCPC note the content of the paragraph

17.12.12 KcCPC note the content of the paragraph

17.12.13 KcCPC note the content of the paragraph

17.12.14 KcCPC note the content of the paragraph

17.12.15 KcCPC note the content of the paragraph

17.12.16 KcCPC note the content of the paragraph

17.12.17 KcCPC note the content of the paragraph

##### **c) Operational phase strategy**

17.12.18 KcCPC note the content of the paragraph

17.12.19 KcCPC note the content of the paragraph

17.12.20 KcCPC note the content of the paragraph

17.12.21 KcCPC note the content of the paragraph

17.12.22 KcCPC note the content of the paragraph

17.12.23 KcCPC note the content of the paragraph

17.12.24 KcCPC note the content of the paragraph

17.12.25 KcCPC note the content of the paragraph

**d) Further development of rights of way proposals**

17.12.26 KcCPC note the content of the paragraph

**17.13 Cycling**

**a) Introduction**

17.13.1 KcCPC note the content of the paragraph

**b) Existing cycling and Sizewell C construction traffic routes**

17.13.2 KcCPC note the content of the paragraph

17.13.3 KcCPC note the content of the paragraph

17.13.4 KcCPC note the content of the paragraph

**c) Proposed improvements to cycling infrastructure**

17.13.5 KcCPC note the content of the paragraph and Table 17.1

**d) Proposed new cycle route**

17.13.6 KcCPC note the content of the paragraph and Figure 17.20

17.13.7 KcCPC note the content of the paragraph and Figure 17.20

17.13.8 KcCPC note the content of the paragraph

17.13.9 KcCPC note the content of the paragraph

17.13.10 KcCPC note the content of the paragraph

17.13.11 KcCPC note the content of the paragraph

17.13.12 KcCPC note the content of the paragraph

17.13.13 KcCPC note the content of the paragraph

**Document ends – See Appendices**