

The Planning Inspectorate
Major Casework Directorate
For the attention of Gail Boyle
Temple Quay House
2 The Square
Bristol, BS1 6PN

4<sup>th</sup> June 2019

Your Ref: EN010012-000670

## Dear Ms Boyle,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by EDF Energy (the Applicant) for an Order granting Development Consent for the Sizewell C Nuclear Power Station (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

In respect to the above matter, Kelsale cum Carlton Parish Council are concerned that the utilisation of the "de-trunked" A12 (from both the A14 J58 in the South and from an indeterminate point south of Lowestoft) forms the major route for traffic involved in the construction, operation and subsequent decommissioning of the Sizewell C Nuclear Power Station.

For the purposes of clarity, Kelsale cum Carlton Parish Council draws the attention of The Planning Inspectorate to the high level of single carriageway comprising the A12 north of Woodbridge, interspersed with occasional and generally short lengths of dual carriageway.

In addition, the Parish Council draws the attention of The Planning Inspectorate to the type of roads intersecting the A12 and the potential consequences of these largely un-kerbed roads being subject to increased traffic and most particularly, diverted HGV traffic.

In many cases intersecting roads quickly migrate into a network of narrow, or single-track roads, only negotiable by utilising "passing points".

It may also be useful to understand that many of these lesser roads, as well as being used regularly by East Suffolk residents, are also widely utilised by holidaymakers, farmers and for a wide range of leisure pursuits (i.e. Horse riding, cycling, walking, etc.).

However, within the Pre-planning Consultation(s) (including the PEI), there is little or no consideration of the fundamental environmental and ecological impacts that the substantial amount of generated SZC traffic will have on the A12 and the adjoining road networks.

Therefore, Kelsale cum Carlton Parish Council consider it imperative that this significant omission is rectified.

In that connection, Kelsale cum Carlton Parish Council seek the opportunity afforded by the Scoping Opinion to emphasise the importance of full and exhaustive analysis of potential environmental and ecological impacts on the;

- A12 per se
- adjoining minor roads
- villages, communities and settlements alongside
- A12 roadside and intermediate landscape (i.e. litter, debris, load losses, tyre losses, etc.)
- flora
- fauna
- habitats
- roadside and mid-range nature reserves
- protected species
- water courses
- air quality
- heritage assets and historic environments
- enjoyment and amenity offered by the route to residents, visitors and businesses in the East Suffolk area
- Public Rights of Way, Bridleways, etc.
- A12 immediate and intermediate arable land and crops (dependent on propagation patterns)
- A12 immediate and intermediate horticultural land (dependent on propagation patterns)
- A12 immediate and intermediate livestock (dependent on propagation patterns)
- A12 immediate and intermediate recreational open spaces (dependent on propagation patterns)
- A12 immediate and intermediate open-air leisure businesses (dependent on propagation patterns)
- aguifers and similar
- A12 immediate and intermediate rivers, streams and ponds (dependent on propagation patterns and flow threats)

In particular Kelsale cum Carlton are concerned with the identification, quantification and proposals for the mitigation of adverse impacts arising from (but not exclusively):

- Air pollution
- Traffic Noise
- Extended hours of 'heavy traffic flows'
- The increased HGV and LGV components in daily traffic flows
- Particulates, dust and other airborne materials
- The route topology and the changeable propagation patterns arising
- Surface water behaviour...
- ...run-off composition, treatment and in-flow management...
- ...alongside the component ditches, gulley's, ducts, etc.
- Vehicle fuels and load seepage, loss, etc. (individually and in combination)

As a Parish split by the A12, Kelsale cum Carlton Parish Council are very concerned about the mental and physical health and wellbeing of residents and visitors to the Parish.

With a significant elderly population, a Primary School serving a wide area and specialised housing for vulnerable people, it is incumbent on the Parish Council to seek appropriate safeguards during this period of potentially damaging levels of additional traffic on and around the A12.

With very limited public transport available, residents of Kelsale cum Carlton are very dependent on either walking, cycling or private cars as the primary methods of conducting their daily lives. As a consequence, adverse impacts on the A12 and the surrounding road network must be fully understood to enable residents to plan accordingly. The Pre-planning Consultation(s) and PEI have not enabled this.

Kelsale cum Carlton Parish Council also attach their formal response to the SZC Stage 3 Pre-Planning Consultation and draw the attention of The Planning Inspectorate to:

i] the specific environmental concerns arising from the EDF Energy proposal for a Sizewell Link on the northern boundary of Kelsale cum Carlton, and the treatment they have been given in the PEI.

**ii]** the generic environmental and ecological impacts identified by Kelsale cum Carlton Parish Council throughout the response.

iii] the A12 adjacent and close proximity environmental and ecological assets in and around Kelsale cum Carlton (i.e. Simpsons Fromus Reserve, Tiggins Lane, North Green Roadside Reserve, etc.) and the increasing number of listed species of Flora & Fauna in the area (i.e. Sandy Stiltball, Great Crested Newts, Turtle Doves, Nightingales, Cuckoo, assorted bat species, Brown Hares etc.) Please note there is a new Roadside nature reserve numbered site 209 at Tiggins Lane which is near site 102

**iv]** The centre of Kelsale has been designated a Conservation Area from Autumn 2018 and it is important to ensure that adverse impacts resulting from the proposed development on the setting of the conservation area are fully assessed by EDF Energy.

v] The mix of potential Energy Projects on this coast in addition to an ambitious house building program that must put an enormous strain on the water supply in one of the driest regions of the country.

The Planning Inspectorate may also wish to visit other Kelsale cum Carlton Parish Council documents pertaining to the SZC proposals, available under the 'Consultations' tab on the Parish Council website KcC Parish Website.

The Parish Council would also draw the attention of The Planning Inspectorate to the 2014 Scoping Opinion response, jointly made by Suffolk County Council and the then, Suffolk Coastal District Council. For the sake of completeness Kelsale cum Carlton Parish Council attach a copy.

In concluding, Kelsale cum Carlton Parish Council thank The Planning Inspectorate for their consideration of these matters and look forward to offering further assistance and information should it be required.

**Yours Sincerely** 

Councillor Edwina Galloway – Vice Chair & SZC Portfolio, Kelsale cum Carlton Parish Council

**Attached (2):** Joint SCC & SCDC 2014 Scoping Opinion response KcC PC Stage 3 Consultation response