



EXECUTIVE SUMMARY

Introduction

This document comprises the issues, observations, questions and concerns of Kelsale cum Carlton Parish Council having considered the latest proposals brought forward by EDF Energy at Stage 4 of the Pre-Application Consultation process.

It should be read in conjunction with EDF Energy's Consultation Documents and all previous responses made by Kelsale cum Carlton Parish Council and particularly that submitted at Stage 3.

Kelsale cum Carlton

The location of Kelsale cum Carlton Parish (**Fig. 1 below**) very much puts it squarely in the 'crosshairs' of EDF Energy's latest proposals.

The Parish is bisected by the A12, the proposed access route for; 85% of all Sizewell C HGV traffic, Wickham Market's Park and Ride Buses, LGV vehicles, Mail Consolidation Centre vehicles and workforce traffic - in addition to the everyday traffic using Coastal Suffolk's only direct north/south route.

Since Stage 3 it has also become the proposed location for the western end of a Sizewell link road, carrying the vast majority of all inbound and returning traffic, to and from the Sizewell C Main Development Site.

Now at Stage 4, it also has proposed day and night freight train services on the Saxmundham to Leiston branch line (and overnight stabling) running along its southerly border at Clay Hills.

Consequently, Kelsale cum Carlton Parish Council are now gravely concerned that **how** Sizewell C is now being proposed to be delivered;

- poses a significant threat to the health and well-being of residents, particularly in communities on or adjacent to the A12
- threatens irrevocable damage to ecological assets throughout a largely agricultural Parish
- could, without strong pro-active management by EDF Energy, turn the network of narrow lanes into dangerous 'rats runs', inappropriate to the vehicles trying to use them, as has already happened in Carlton Green (to the west of the A12) over the last year or so.



"The environment is where we all meet;
where we all have a mutual interest;
it is the one thing all of us share."

Claudia Alta 'Lady Bird' Johnson (December 1912- July 2007)

Wife of Lyndon B Johnson

The KcC PC position at Stage 3

At Stage 3, as in all previous consultations Kelsale cum Carlton Parish Council did not express a view on **'the what'** (i.e. the nuclear issue) but remained focused on **'the how'** EDF Energy were proposing to deliver another nuclear power station into the Sizewell site. After research, consulting residents and an extensive response to the consultation, the KcC PC concluded they:

- were unable to support the Road-led proposal, largely due to the volume and density of HGV movements (loaded and empty) negotiating the A12, other construction traffic and 'normal traffic' including the seasonal peaks.
- were also unable to give full support to the Rail-led option despite wanting to. Again, largely due to the continuing high dependency on the A12 to transport a disproportionately high level of construction traffic carrying materials.
- could only oppose the Sizewell link road proposal, finding it did nothing to address the fundamental weaknesses of the A12 as the primary access to the Sizewell C Main Development Site, whilst simultaneously bring construction traffic farther north than necessary, to a proposed road with no enduring legacy for Coastal Suffolk.



KcC PC and the Stage 4 Consultation

When Kelsale cum Carlton Parish Council heard of another consultation being brought forward, it had hoped that Stage 4 would herald a 'new dawn' and that by doing so, so promptly EDF Energy were going to ring the changes in its approach, and recognise the widespread and legitimate concerns of communities along the length of the A12.

However, this forlorn hope evaporated on contact; 'a third way', more work in progress, more 'land take', more vagueness and ambiguity, more unevidenced assertions, more inexactitude, more spin, more evasion, less data, less clarity, less certainty, less accuracy, less interaction and more doubt. This most definitely is not EDF Energy's finest hour.

Nevertheless, Kelsale cum Carlton Parish Council have carried out a thorough review and in its detailed response have identified nearly seventy concerns designated as 'ISSUE BOXES'.

What is very clear from this review and confirming the experience of the prior consultations is that; Kelsale cum Carlton Parish Council still have two pivotal and overriding concerns, first the fundamentals;

ISSUE 1 - BASE DATA AND PROPOSAL CLARITY

Throughout the Stage 1-4 consultation phases, EDF Energy have seemingly set out to shroud real issues in; incomplete, inadequate, incompatible and sometimes incorrect data.

For example, EDF ENERGY chose a line graph at Stage 3 (Figure 6.5) to portray the "Proposed HGV delivery profile".

There are several issues making this format inappropriate for the communication of a clear picture of fundamental data;

- a line graph was used rather than a bar graph, which would certainly have given greater clarity
- the inclusion of a second 'Departures profile' in a Figure supposedly portraying an 'HGV delivery profile'
- the use of a percentage axis, thereby obscuring absolute volumes, with no associated reference table provided
- data only portraying the Rail-led option (i.e. lowest volume and shortest operational hours) and no comparator
- no tabular data sets supporting data comparison; rail-led vs road-led, early years vs peak, etc.
- the use of a single vertical line to denote an hourly period and inappropriate label format (1900-2000)

The consequence is that even at Stage 4, and potentially just around the corner from an Application for an Development Consent Order, Kelsale cum Carlton Parish Council have not had enough solid contiguous data to be able to describe (with any degree of confidence) to its residents, what life in Coastal Suffolk will look like over the next 10-15 years.

Second, is the continuing dependence on a disproportionately high "road based fulfilment mechanism" for not only construction materials, but also supplies, people and services, etc.

But within that seemingly simple issue, there are two overarching concerns; one the dependency on the A12, not just for the construction of Sizewell C, but also for Coastal Suffolk residents, businesses, tourists and other visitors to carry on their day to day lives. Second is the intensity and relentlessness of HGV traffic on the A12 over such a protracted period.

ISSUE 2a - THE CONTINUING AND CRITICAL DEPENDENCY ON ROAD BASED FULFILMENT

Despite, the Stage 4 consultation being positioned as a vehicle for "...new proposals, particularly for the transport of freight to and from the construction site...", the headline flatters to deceive. Unpicking reality from rhetoric, EDF Energy are persisting with a largely road based fulfilment strategy, albeit with; components from previous attempts reconfigured, a tweak or two on train utilisation and a brand new name 'integrated' slapped on the side. **Continues on the next page...**



ISSUE 2a CONTINUES...

So, noting the paucity of data (at Issue 1 above), it all seems to boil down to **how much better the reality will be than:**

368, 965 return HGV journeys on the A12 spread over 12 years carrying...

10,700, 000 Tonnes of construction materials to site...

Travelling in excess of **25,000,000** kilometres on the A12...

Plus, P&R buses, workforce cars, LGVs, motorbikes not forgetting...

Coastal Suffolk's day to day resident, business, farm, emergency service, school and tourist traffic

The second relates to the totally foreseeable consequences of the first. Most notably, what impact will the additional traffic have on not only the road surface, but also the bed of the A12 and other Coastal Suffolk roads planned to carry construction traffic. Not forgetting those lanes and roads that will take additional 'unplanned for' traffic (i.e. EDF Energy's "self-re-routing", 'rat runs', etc.).

However, this whole issue seems to have been avoided in the EDF Energy proposals, with seemingly no consideration being given to the issues of carriageway repair (planned and unplanned) and renewal.

Below are some of the considerations Kelsale cum Carlton Parish Council surfaced that appear not to be addressed in EDF Energy's consultations thus far:

ISSUE 2b - CONTINUING AND CRITICAL DEPENDENCY ON ROAD BASED FULFILMENT

In building this response Kelsale cum Carlton Parish Council have noted that:

- A] A 44 Tonne HGV has a higher attrition rate on the road surface and bed, widely estimated to be **130,000+ times worse than a Ford Focus**
- B] Suffolk County Council Highways are responsible for the A12
- C] EDF ENERGY have no notified proposal to contribute to the A12's repair and renewal
- D] EDF ENERGY have no notified proposal to contribute to the repair and renewal of other SCC roads

Kelsale cum Carlton Parish Council are concerned that the increased burden of road repair and renewal implicit in the above, is likely to fall in one direction...the Council Tax payers?

The KcC PC position at Stage 4

Kelsale cum Carlton Parish Council have continued to examine the Sizewell C Project based solely on **how** EDF Energy propose to deliver a new nuclear power station into the "unique" Coastal Suffolk environment at Sizewell, rather than any issues relating to nuclear power itself.

As a direct consequence of Kelsale cum Carlton Parish Council's experience in dealing with EDF Energy throughout the Pre-application consultation process, and the continuing degrees of separation on so many fundamental issues, Kelsale cum Carlton Parish Council have concluded that they are left with no alternative other than to oppose the development of a new Nuclear Power Station (Sizewell C) at Sizewell.

In coming to this conclusion, the Parish Council has considered EDF Energy's response to issues raised in previous consultations and feel the seventy plus issues raised at Stage 4 exemplify the gulf between EDF Energy and the interests of Kelsale cum Carlton residents and businesses.