

"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



## 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.

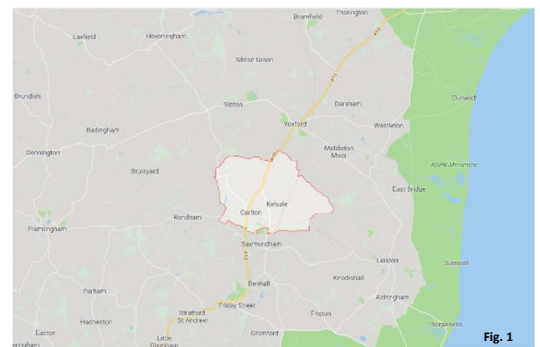
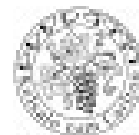


Fig. 1

### 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 FULFILLMENT**

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 FULFILLMENT**

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.



## INTRODUCTION

This document details the response of Kelsale cum Carlton Parish Council [KcC PC] having considered the latest proposals being brought forward by EDF Energy at Stage 4 of the Pre-Application Consultation process [Stage 4]. It should be read in conjunction with all previous responses made by KcC PC, particularly those points made at Stage 3.

In making this response KcC PC has sought to provide EDF Energy with observations, questions and issues insofar as they may directly or indirectly impact the residents, businesses and visitors to the Parish.

### The current narrative

Prior to responding to the full 190-page document, KcC PC feel obliged to draw EDF Energy's attention to four EDF Energy publications coming forward in July that appear to have similar but nuanced Forewords by Jim Crawford.

The first publication is the **Project Update Sizewell C**, mailed out to residents and dated **July 2019**

The second publication is the **Consultation Summary Document** and is dated **Summer 2019**.

The third publication is an **advertisement placed in the East Anglian newspaper on Thursday 4<sup>th</sup> July 2019** stating, *"Feedback from local communities has helped shape our proposals, particularly around reducing the impacts of construction."*, whilst promoting *"We recognise our responsibilities for the local environment and to reduce the amount of traffic on local roads..."* as well as presaging Stage 4, the Public Consultation.

The final publication is the Foreword in the 190-page **Consultation Document** dated **Summer 2019**

KcC PC note that in communicating progress on Sizewell C to the public at large, some of the language being used is imprecise, sloppy and neglectful of the truth.

For example, on Page 5 of the **Project Update Sizewell C** EDF Energy eulogise about *"During construction, we will need to transport hundreds of people and thousands of tonnes of freight to and from the site."* KcC PC regard the use of *"...thousands of tonnes..."* as a gross inexactitude deliberately misleading the public at large. The issue being that, the estimated 10.7 million tonnes of materials at Stage 3, can in no way be described as *"...thousands of tonnes..."*.

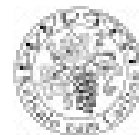
Similarly, *"...hundreds of people..."* may be appropriate to describe one shift, on one day but it is wholly inaccurate to use it for a project extending over 9-12 years and described elsewhere as generating significant employment opportunities (i.e. hundreds, thousands, etc.).

In the same publication, a foreword entitled *"A word from Jim"* claims *"Sizewell C...will play a major role...in fighting climate change."* From the KcC PC perspective, this type of inflated narrative has no place in a publication produced by a player in an international market, where accuracy and quality must be absolute.

So, whilst KcC PC can appreciate that Sizewell C (if approved) may play a part in the UK Government's efforts to contribute to a worldwide climate change programme, in the absence of any evidence or indeed quantification by EDF Energy, KcC PC find it highly unlikely that Sizewell C's role could be regarded as 'major' in the global context – climate change being a global phenomenon. Can EDF Energy share their quantification of the 'major role' that Sizewell C might play in global efforts to reduce climate change?

Later in the same article, Jim Crawford is attributed with saying *"The EPR reactor design for Sizewell C is similar to...Sizewell B..."* and *"...is currently in commercial operation in China."* Whilst KcC PC accept that the Sizewell C lineage may contain some 'nuclear DNA' shared with Sizewell B, does the attribution of 'similarity' really stand close inspection and if it does, can the implied link between Sizewell B (and thus Sizewell C) and EPR technology in commercial production in China be substantiated?

KcC PC would welcome EDF Energy evidencing the degree of 'similarity' between Sizewell B, Sizewell C and the commercially operated China EPR designs. Perhaps an educative piece in the next Sizewell C Update, demonstrating the degree of similarity between 'B', 'C' and current Chinese commercial EPR designs?



On page 4 of the same document, the carefully crafted opening paragraph infers that the majority of respondents to Stage 3 were minded that as long as further losses of land comprising AONB and SSSI were limited to only those that were *"...absolutely necessary..."*, then it is largely a question of *"mitigate, and...compensate..."*! Once again, in the absence of any quantification or evidence being offered by EDF Energy, KcC PC find it difficult to believe that this statement would stand closer inspection and invite them in their next Sizewell C Update to demonstrate the basis for their assertions.

Finally, is it any coincidence that the Jim Crawford Foreword in the (presumably long ago glossily printed) **Consultation Summary Document Summer 2019** persists in advancing that *"Sizewell C...play a major role in fighting climate change."*, as did the **4<sup>th</sup> July 2019 East Anglian advertisement** which was presumably pre-booked. Whilst the Jim Crawford Foreword to the **Stage 4 Pre-Application Consultation Document** (a simply re-printable punched insert) drops the *"...major role in fighting climate change."*, substituting a narrower piece advancing Sizewell C as *"...helping to meet the nation's future need for low carbon energy."*?

### ISSUE 3 - EDF ENERGY PUBLIC RELATIONS

KcC PC regard the degree of 'creative writing' being employed by EDF Energy in the generation of some of the material for consumption by Suffolk residents and the public at large, as being beyond what would be permissible within the confines of the Advertising Standards Authority's Codes.

## DETAILED STAGE 3 RESPONSE

### 1. INTRODUCTION

#### 1.1 Introduction

- 1.1.1 KcC PC note the details regarding NNB Generation Company (SZC) Limited otherwise known as **EDF Energy2**
- 1.1.2 KcC PC note the details regarding **Stage 3** Consultation and **The Project** referencing the full cycle of Sizewell C
- 1.1.3 KcC PC note that EDF Energy's proposals *"...continue to be refined in response to feedback and further learning..."* from Hinkley Point C.
- 1.1.4 KcC PC note the narrow scope of the **Stage 4** consultation
- 1.1.5 KcC PC note EDF Energy have an interest in receiving views on:
  - the alternative freight management option christened 'Integrated' as it contains elements of both strategies
  - an alternative Wickham Market traffic management approach
  - two new pylon configuration proposals at the Sizewell C Estate
  - a new railhead option at Eastland's Industrial Estate
  - whether the proposed Sizewell Link Road should be permanent or removed at the end of construction
  - proposals mitigating ecological and flood risk impacts, but also increasing the 'land take'.
- 1.1.6 KcC PC note that EDF Energy are bringing forward *"minor changes"* from those proposed at **Stage 3**. KcC PC note many of these changes (arising from design and mitigation proposals also) increase the 'land take'.
- 1.1.7 KcC PC note that surprisingly EDF, Energy are continuing to consider their options put forward at **Stage 3** and invite comments within the **Stage 4** Consultation timeframe.
- 1.1.8 KcC PC note EDF Energy do not necessarily intend to progress all infrastructure proposals described at **Figure 1.1** through to an ADCO. KcC PC also note proposals going forward to an ADCO depend on decisions made subsequent to the conclusion of the **Stage 4** Consultation.



- 1.1.9 KcC PC note the sources of information during the **Stage 4** Consultation and how to respond to it. Consultation – details for both are also laid out at **Chapter 8** of the **Stage 4** Consultation Document.

**Figure 1.1** at pages 2 & 3 is noted

## **1.2 Policy Context**

- 1.2.1 KcC PC note that the overarching National Policy Statements for Energy (NPS EN-1) and Nuclear Power Generation (NPS EN-6) were designated in 2011.
- 1.2.2 KcC PC note that the need for The Project, in listing Sizewell as one of eight suitable sites for new nuclear power stations for deployment prior to the end of 2025, was established in NPS EN-6.
- KcC PC notes the assertion from EDF Energy that the need for new nuclear power generation formally remains as “urgent”.
- 1.2.3 KcC PC note that Central Government began the process of consulting on the preparation of a new NPS for new nuclear power stations in December 2017. KcC PC also note that subject to the outcome of the Governments consultation, EDF Energy are confident that the Government propose to carry forward the sites listed in NPS EN-6 to the new NPS, including Sizewell.
- 1.2.4 KcC PC note that a more detailed explanation of the Planning Policy context for The Project was given at Stage 3 and can be found at **Volume 1, Chapter 3** of the **Stage 3** Main Consultation document.

## **1.3 Decarbonisation and the need for new nuclear capacity**

- 1.3.1 KcC PC note the intention of the Government (under Theresa May) to bring forward legislation amending the Climate Change Act to reflect the revised targets implied by the net zero target announced by the former Secretary of State for Business, Energy and Industrial Strategy (Greg Clarke) on 12<sup>th</sup> June 2019.
- The recent ascent of Boris Johnson to leader of the Government, someone who has declared himself a ‘passionate’ supporter of nuclear power, has yet to manifest itself in any new initiatives since those announced on the 22<sup>nd</sup> Jul-19 which included a consultation into the funding of large-scale nuclear power plants and a proposed GBP18 million (USD22 million) investment into small modular reactors.
- 1.3.2 KcC PC note the EDF Energy eulogy on the low carbon benefits of nuclear power, and the comparison of the advantageous ‘carbon footprint’ when compared to all but wind generation.
- However, given the reluctance of EDF Energy to disclose the total road miles required to deliver 10.7 million tonnes of materials to Sizewell, from the point of extraction to incorporation into the new nuclear power station at the Main Site, there must be significant concerns about how closely EDF Energy maintain clarity on their absolute carbon footprint for The Project.

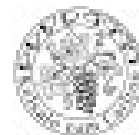
### **ISSUE 4 - THE SIZEWELL C CONSTRUCTION PHASE FOOTPRINT**

KcC PC regard the absence of full disclosure on the carbon footprint of raw and manufactured materials for the construction of Sizewell C (estimated at 10.7m tonnes at Stage 3) from the point of origin to incorporation at the Main Site (including manufacture and transport) as a deliberate omission.

Moreover, the unwillingness of EDF Energy to make clear the projected total number of road movements and road miles (by vehicle category) required to deliver a working new nuclear power station (and ancillaries) suggest they either don’t know, or are reluctant, lest disclosure cause alarm amongst communities along the designated route(s).

- 1.3.3 KcC PC note EDF Energy’s denigration of ‘renewables’ generation for its inability (in solar or wind form) to deliver uninterrupted supply or conversely wastefully over produce, during peak output. What EDF Energy fail to





mention is how a truly integrated (sic) and broad selection of low carbon generating capabilities can be valuable in ensuring continuity of supply and avoiding dependency on a single technology and supplier.

- 1.3.4 KcC PC note EDF Energy's view of the current shortcomings of electricity storage and Carbon Capture & Storage (CC&S) technologies.
- 1.3.5 KcC PC note the expressed view of EDF Energy in respect to the 'essential' nature of nuclear energy as the baseload generation technology.
- 1.3.6 KcC PC note the inclusion of a selected excerpt, rehearsing the view of the Government on nuclear energy, at the time of publication of NPS EN-1.

KcC PC recognise that this extract reflects Government Policy at the time and is possibly a view still widely held in the corridors at Westminster. However, KcC PC also note that this policy was not and is still not one that has universal support in either Westminster or the country.

- 1.3.7 KcC PC note the portrayal of the Government's most recent scenario whereby 12.3GW of new nuclear power capacity is envisaged by 2035. KcC PC also note EDF Energy's belief that Sizewell C would provide 3.2GW of this capability, i.e. over 25%.

#### **ISSUE 5 - EDF ENERGY'S DISPARITY IN DESCRIBING THE PLANNED SIZEWELL C GENERATION CAPABILITY**

KcC PC are concerned that within the Stage 4 Consultation Document, EDF Energy seem unable to agree amongst themselves exactly what the generation capability of Sizewell C is. In **Para 1.3.7 (above)**, capacity is claimed to be **3.2GW**, yet just a handful of pages further on at **Para 2.2.1 (Page 9)**, the alleged capacity of Sizewell C appears to have increased to **3.34GW** an increase of **+3.75%**. In an industry where safety, quality, accuracy, reliability and standards are all critical, should KcC PC be at all concerned about whether these values are thoroughly embedded in the consultation?

#### **1.4 Structure of the Stage 4 consultation document**

##### **a) Overview of our proposals**

- 1.4.1 KcC PC note the respective roles of **Stage 4 Chapter 2**, the **Stage 3 Main Consultation Document** and the **PEI Volumes 2 & 3** delivered within **Stage 3**.

##### **b) Freight management strategy**

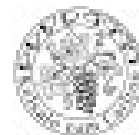
- 1.4.2 KcC PC note the bringing forward of a 'third way' or as coined by EDF Energy a new *"integrated"* freight management strategy.

However, KcC PC find it difficult to see exactly how this *"integrated strategy"* is any more, or any less "integrated" than the previously proposed *"alternative options"* that have seemingly given birth to this new approach.

At face value, it would seem that *"integration"* in this case does little more than make some tweaks to the Rail/Road mix, modify railhead delivery and simultaneously remove cost from The Project, benefitting EDF Energy but being far less 'generous' to Coastal Suffolk than a rail-led strategy.

- 1.4.3 KcC PC note the assertion from EDF Energy that; the necessity to seek a third way is driven largely by the inability or unwillingness of Railtrack to deliver a significant package of uplift work to both the East Suffolk Line and the Saxmundham to Leiston branch line within the 'necessary' timeframes. Whilst KcC PC understand that this may be pragmatic, it is concerned at the potential implications of the phrase at the end of the paragraph describing the outcome as *"...the optimum rail strategy...delivered within our control"*.





- 1.4.4 KcC PC note the intention of EDF Energy to provide a comparison between the three options. However, KcC PC is concerned that little appears to have been done to improve the clarity and completeness of the likely traffic and environmental impacts since **Stage 3**. Further exploration of the relevant concerns will be made within the appropriate Chapters.

**c) Changes to the main development site and associated developments**

- 1.4.5 KcC PC note EDF Energy are apparently working with some impacted parties to reduce the impacts of construction but are concerned that increased 'land take' appears to be the answer in almost all cases.
- 1.4.6 KcC PC note that in **Chapter 5**, EDF Energy are bringing forward "*proposed changes to the main development site (the "red line boundary")*" with "*justification*" for each change, alongside an "*assessment*" as to whether each change has an impact on the **inadequate, incomplete and inappropriate** (especially for late addition developments i.e. Sizewell Link Road) **PEI** used at **Stage 3**.

In addition, KcC PC note that EDF Energy have suggested some potential sites that could be used to compensate for some of the potential ecological and flood risk impacts of The Project. EDF Energy suggest that these sites are in addition to the mitigation proposed at **Stage 3** and have been selected specifically to address detrimental impacts on; recreation, marsh harriers, fen meadows and compensatory flood land.

Once again KcC PC is concerned that the ambitions of EDF Energy for Sizewell C are once again increasing the gross 'land take' for The Project and the continually growing list of damaging impacts that its construction generates.

- 1.4.7 KcC PC note EDF Energy are apparently working with some stakeholders to reduce the impacts of "*associated developments*" and their construction, but once again are concerned that increased 'land take' appears almost uniquely to be the answer.
- 1.4.8 KcC PC notes the paragraph, whose purpose seems designed solely to position **Table 1**.

**ISSUE 6 - THE INADEQUACY OF THE STAGE 3 PEI**

KcC PC once again draw EDF Energy's attention to the incomplete PEI provided at Stage 3 and seek clarity on when and how a complete and meaningful PEI will be provided, prior to any ADCO.

- 1.4.9 KcC PC notes the paragraph, whose purpose seems designed solely to position **Chapter 7**.

**Table 1.1** at pages 6 & 7 is noted

**ISSUE 7 - THE INCREASED LAND TAKE AT STAGE 4**

KcC PC are concerned at the continual and growing level of 'Land Take' being described by the EDF Energy Sizewell C proposals, seemingly without any reference to the total acreage of land to be utilised by EDF Energy, directly or indirectly.

When will EDF Energy disclose the total acreage being utilised during the construction and operation phases, alongside a full digest of the 'end state' and 'end date' for each land parcel?

When will the cumulative ecological impact of this 'land take' be catalogued and independently audited?

**1.5 Approach to consultation**

- 1.5.1 KcC PC note the paragraph and the adjoining **Figure 1.2**



- 1.5.2 KcC PC note the temporal limits of the **Stage 4** consultation.
- 1.5.3 KcC PC note EDF Energy's intention to develop "final proposals" for inclusion within "the Application for Development Consent" paying due "regard to the outcome of this [Stage 4] consultation" and "further engagement with statutory consultees, and further environmental and modelling assessments."
- 1.5.4 KcC PC note EDF Energy's abbreviated summary of the ADCO process.
- 1.5.5 KcC PC note EDF Energy's publicising of the Planning Inspectorate's website as the authoritative source of information regarding the planning process for nationally significant infrastructure projects.
- 1.5.6 KcC PC note the intention of EDF Energy to continue informal engagement with interested parties outside of the formal process and look forward to fully participating.

## **1.6 Approach to acquisition of land**

- 1.6.1 KcC PC note the intention of EDF Energy to acquire land by Compulsory Purchase if private agreement cannot be reached with landowners.

KcC PC note EDF Energy intend to seek powers of compulsory purchase in the ADCO, over all third party land required for development and delivery of The Project.

## **2. PROJECT OVERVIEW**

### **2.1 Introduction**

- 2.1.1 KcC PC note the EDF Energy description of the **Stage 3** Main Consultation Document.
- 2.1.2 KcC PC note the EDF Energy explanation of the purpose of the **Stage 4** consultation.
- 2.1.3 KcC PC note that EDF Energy believe rail should "...play an important role in the delivery of freight during construction, but feedback from Network Rail...highlighted a risk that works...could impact negatively on the programme...of The Project".

KcC PC also note "Network Rail would not be able to commit to a definitive programme...". Consequently, EDF Energy state "...the rail-led strategy would...mean accepting greater uncertainty...which may be of concern to potential investors and to the Government given the "urgent" need...in the NPS for Nuclear Power Generation (NPS EN-6)."

However, KcC PC note "...we are continuing to consider the rail-led strategy as an option...".

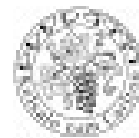
- 2.1.4 KcC PC note that the details of the "integrated strategy" are set out at **Chapter 3**, with updated traffic modelling at **Chapter 4**.
- 2.1.5 KcC PC note that "Much of the detail...set out at Stage 3 remains unchanged...has not been repeated...in this Stage 4..." but that "Changes and alternative options...that are proposed in this Stage 4...are highlighted."

### **2.2 Site and scheme overview**

- 2.2.1 KcC PC once again draw EDF Energy's attention to the uncertainty created over the potential output of a constructed and operational Sizewell C (see **ISSUES 5 and 8 below**).

KcC PC note that this summary fails to mention the dependency on;

- the required works to Sizewell B facilities currently being pursued through a Planning Application to East Suffolk
- further intrusion into sensitive ecological assets (AONB and SSSI)
- a satisfactory PEI being completed



#### **ISSUE 8 - EDF ENERGY'S DISPARITY IN DESCRIBING THE PLANNED SIZEWELL C GENERATION CAPABILITY**

KcC PC are concerned that within the Stage 4 Consultation Document, EDF Energy seem unable to agree amongst themselves exactly what the generation capability of Sizewell C is. In **Para 1.3.7**, capacity is claimed to be **3.2GW**, yet just a handful of pages further on at **Para 2.2.1 (above)**, the alleged capacity of Sizewell C appears to have increased to **3.34GW** an increase of **+3.75%**. In an industry where safety, quality, accuracy, reliability and standards are all critical, should KcC PC be at all concerned about whether these values are thoroughly embedded in the consultation?

**Figure 2.1 Main Development Site context** at pages 10 & 11 is noted

KcC PC are particularly concerned at the lack of clarity as to whether the '*Red Line*' relates to the **Stage 3** or the amended **Stage 4** proposal.

This 'laxity' of labelling exemplifies the inadequacy, lack of clarity and thought for potential readers that EDF Energy have given to much of the consultation documentation at **Stage 3** and now **Stage 4**.

Whilst this may simply be poor judgement or sloppy working process, the ambiguity and confusion this creates may unfortunately not be entirely accidental.

- 2.2.2 KcC PC note the designation of the planned Sizewell C reactors as UK EPR™ and are concerned that the '**A WORD FROM JIM**' included in the **Project Update Sizewell C** publication **July 2019** fails to clearly inform the public of the differences between Sizewell B reactors, Chinese commercially operated reactors and those destined for Sizewell C.

KcC PC also draw EDF Energy's attention to **ISSUES 5 and 8 (above)** in respect to the claimed output of an operational Sizewell C.

Could EDF Energy clarify which (3.2 or 3.34GW) claimed output has been used in the computation deriving Sizewell C's ability "*...to generate enough electricity to supply approximately six million homes (about 20% of Britain's homes).*" and for absolute clarity do EDF Energy mean:

- Great Britain or the United Kingdom?
- Homes, houses or households?
- 2018 statistics or earlier?

- 2.2.3 KcC PC note the intention of EDF Energy to use "*Different permutations of...associated development components...*" (components described variously as; campus accommodation, park and ride facilities (x2), freight management facility (x1), various road and rail improvements) in their ADCO, "*...depending on which strategy is progressed...*".

KcC PC believe this implies that EDF Energy's ADCO may/will take a form not previously consulted on in totality (by EDF Energy), but nevertheless comprising components previously consulted on in one context, reconfigured into another.

Were this the outcome of the Pre-Application Consultation process and the ADCO markedly different (accepting it might be permissible), KcC PC would be disappointed that EDF Energy felt it necessary to treat the consultation process so shoddily.

## **2.3 Main Development Site**

### **a) Introduction**

- 2.3.1 KcC PC note the summary description of the site, its location and the loose definition of construction and operational phase land requirements.



- 2.3.2 KcC PC note the four principal components of the Main Development Site (Power Station platform, Sizewell B Relocated Facilities Land, Temporary Construction Area and LEEIE) and the accompanying representation at **Figure 2.2**.

KcC PC note the same land is also presented at **Figure 2.4** using different nomenclature and sub-divisions.

Again, it is not immediately clear whether the '*Red line boundary*' portrayed (in both **Figure 2.2** and **2.4**) is that at **Stage 3** or including the proposed revisions at **Stage 4**.

## **b) Proposed development**

### **i. Introduction**

- 2.3.3 KcC PC note the variously described; works, buildings, engineering and other operations that may comprise the Main Development Site.
- 2.3.4 KcC PC note the variously described; works, buildings, engineering and other operations that may comprise the development at the LEEIE, dependent on which of the alternative options are selected for inclusion in the ADCO and subsequently exercised by EDF Energy in the event consent is given.
- KcC PC note the absence of any named LGV management provision at the LEEIE and seek confirmation that this is because the LEEIE access is being confined to just HGV and Buses?
- KcC PC note the inclusion of a "*park and ride facility*" at the LEEIE.
- 2.3.5 KcC PC note the additional works (outside of the Main Development Site) "*...which are directly related to works within the main development site...*", but find it difficult to understand why new sports Facilities at Leiston is "*...directly related to works within the main development site...*"?
- 2.3.6 KcC PC note EDF Energy refer to **Volume 1, Chapter 7, Section 7.2** at **Stage 3** for further details of how nuclear power works, etc.
- 2.3.7 KcC PC note the sections summarising the permanent development and construction phase at the Main Development Site at **Stage 4** and how it differs from **Stage 3**.

### **Figure 2.3 Operational Masterplan**

KcC PC note the figure at Pages 14 and 15 but regret scale and print quality makes much indecipherable.

### **ii Permanent development**

- 2.3.8 KcC PC note a designed operational life comprising 24 hours a day operation for 60 years. However, KcC PC note that this omits any provision for planned 'outages' or unplanned 'outages'. Is this bald statement achievable and if so, is there a body of evidence supporting this assertion?
- Additionally, KcC PC note a figure of around 900 people during "*normal periods of operation*", without any specific reference to work plan, shift patterns, etc. As these types of arrangements have ongoing impacts, KcC PC had anticipated confirmation of these metrics at **Stage 4**, even if that confirmation was 'no change' to a previously referenced position.
- 2.3.9 See **Figure 2.3** Operational Masterplan (above)
- 2.3.10 KcC PC note the inclusion of "*...raw water supply and storage*" and would welcome clarity on the terminology "raw water" as it does not appear in the list of defined terms.
- 2.3.11 KcC PC note the safety reasons for not applying any finishes to nuclear safety buildings.
- 2.3.12 KcC PC note the continuing consideration being given to minimising the detrimental visual impact of turbine halls and reactors, giving due regard to the AONB and Suffolk Heritage Coast.
- 2.3.13 KcC PC note the location, form and temporal scope of the Operational Service Centre.



- 2.3.14 KcC PC note the proposed location of interim spent fuel store building and the ability for it to have a cladding applied to reduce the detrimental visual impact.
- 2.3.15 KcC PC note that the forebay structures “...are not visible from the majority of public viewpoints.” begging the questions – which public viewpoints are the forebay structures visible from and what impact do they have?
- 2.3.16 KcC PC are concerned at the visual impact of pylons necessary to provide a connection to a National Grid substation. In the absence of another solution, KcC PC view the fewest pylons, occupying the smallest footprint, with the lowest effective height, as the preferable solution.
- 2.3.17 KcC PC have made their views on the proposed relocation of Sizewell B facilities within the Sizewell Estate (via the East Suffolk Planning Application) known to the Planning Authority. In summary the Council was opposed to the application based on its pre-emptive nature and the lack of creativity shown, thereby increasing the ‘land take’ needlessly.
- 2.3.18 KcC PC having already noted **Figure 2.3**, are confounded (in the absence of any EDF Energy response to previous questions) as to why a helipad (which is a heavily environmentally detrimental facility) continues to be brought forward by EDF Energy.
- 2.3.19 KcC PC note the unevidenced assertions about the masterplan and its efficacy in mitigating “...landscape and visual effects of the power station development within the ANOB as well as delivering ecological mitigation.”
- 2.3.20 KcC PC note that **Stage 3, Volume 1, Chapter 7, Section 7.4** is referenced for further layout and design information.

### **iii Construction phase**

- 2.3.21 KcC PC note EDF Energy's seven distinct areas on the Main Development Site (**Figure 2.4**) during the construction phase.

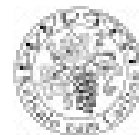
### **Figure 2.5 Construction Masterplan – rail-led and integrated strategies**

KcC PC note the figure at Pages 18 and 19

### **Figure 2.6 Construction Masterplan – road-led strategy**

KcC PC note the figure at Pages 20 and 21

- 2.3.22 KcC PC note the preceding figures at **Figure 2.5** and **Figure 2.6**
- 2.3.23 KcC PC note that the rail-led and integrated strategies include the so called ‘green rail route’ and the road-led strategy does not.
- 2.3.24 KcC PC note there is no “...five phase construction programme...at Volume 1, Chapter 2 of the Stage 3 Main Consultation Document.” This misdirection is yet another example of EDF Energy's slipshod approach to providing clear information to consultees and is symptomatic of an indifference to getting things right!
- KcC PC believe the correct chapter reference to be **Chapter 7**.
- 2.3.25 KcC PC note the highly sensitive issues set out at **Stage 2** and regret that EDF Energy seem determined to force through actions that will damage irrevocably one of the sites of particularly high interest in the region, with little or no regard to the concerns expressed by local, national and international interests.
- 2.3.26 KcC PC find it unbelievable that EDF Energy have yet to reach a satisfactory conclusion regarding the optimum solution for the delivery of freight into the LEEIE.
- 2.3.27 KcC PC note the proposals for the location of borrow pits and stockpiles.
- 2.3.28 KcC PC note the contents regarding proposed underground cable routes to substations.



2.3.29 KcC PC note the proposals for the 'site entrance hub' and regard the continuing insistence of EDF Energy in having over generous vehicle parking areas within the proposal as evidence that they are doing no more than paying lip service to reducing the vehicular movement impacts on the local and wider area road networks. Increased car sharing targets and maximum park & ride utilisation through effective enforcement actions have not even been mentioned by EDF Energy, let alone embraced.

2.3.30 KcC PC note the proposals for the location of the accommodation campus.

2.3.31 KcC PC note the proposal for a secondary access road from Lover's Lane to the LEEIE during construction.

2.3.32 KcC PC note the proposals for phased sea defence installation in the section of the Suffolk Coast identified in **Figures 2.5 and 2.6**. The council also note the intention to build the Beach Landing Facility [BLF] to the north-east of the power station platform.

KcC PC continue to be concerned about potential loss of amenity to residents and visitors during construction and possibly into the operational phase.

### **c) Changes from Stage 3**

2.3.33 KcC PC note that changes at **Stage 4** impact the site boundary proposed in the earlier consultation, with a net increase in the proposed 'land take'.

2.3.34 KcC PC note the nine summarised changes (**Figures 2.1, 2.7, 2.8, 5.3-5.14, 5.20-5.28** as applicable) and will comment in full against the appropriate paragraphs.

2.3.35 KcC PC note details are in **Chapter 5**

2.3.36 KcC PC note being referred to **Volume 1, Chapter 7 of the Stage 3** Main Consultation Document for the basis of the development proposal at the previous consultation.

## **2.4 Green rail route**

### **a) Introduction**

2.4.1 KcC PC note the temporary nature of the 'green rail route' and it only being a component in the rail-led or 'integrated' options, but not within the road-led option.

2.4.2 KCC PC note the limited capacity of the 'green rail route' under the 'integrated option' – up to three freight deliveries per day, **up just one on the road-led option described at Stage 3, and then only at peak construction.**

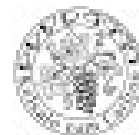
KcC PC also note the capacity increases from 'up to three', to 'up to five deliveries' under a rail-led option. However, this option unlike the 'integrated' option does not appear to carry any constraint (i.e. during peak construction).

Once again KcC PC are forced to conclude that EDF Energy are remaining silent on this issue deliberately and might seek to utilise this omission in the future, claiming they had consulted on the option of running five deliveries per day for the entirety of the construction phase.

## **ISSUE 9 - VAGUENESS, INCONSISTENCY, OMISSION & INCOMPLETENESS**

KcC PC are concerned that the use of; inconsistency, vagueness, omission and incompleteness by EDF Energy in bringing forward their proposals during the consultations, may breed mistrust and enmity rather than the close co-operation with the local communities that EDF Energy stated was their intention at the outset. Moreover, the use of these type of tactics in public consultations is well known to be to be a method for creating a higher degree of 'interpretation' than necessary, enabling considerable 'wiggle room' in the development and implementation of policy, construction or indeed legislation. KcC PC wish to see the extensive inexactitude of EDF Energy's proposals resolved prior to (and/or rigorously challenged by the Planning Inspectorate during,) the ADCO process.





**b) Proposed development**

2.4.3 KcC PC note the original proposal was detailed at **Volume 1, Chapter 8, Section 8.4 of the Stage 3** Main Consultation Document.

It also notes that at **Stage 3** issues had already been raised in respect to noise, were the proposed route to be used at night. KcC PC notes at; **Stage 3, Volume 1, Chapter 8, Figure 8.3** the 'stabling' of trains on the Leiston Branch Line was outlined, this is repeated at **Stage 4, Chapter 3, Figure 3.1**.

**ISSUE 10 - TRAIN STABLING**

KcC PC wish it to be clear that they totally oppose the stabling of trains at the described locations on the Saxmundham to Leiston Branch Line (Stage 4, Chapter 3, Figure 3.1 refers).

In the event that approval is given, KcC PC (with parish residents across open fields at Clay Hills) could not support the proposal for the stabling of trains on the Saxmundham to Leiston branch line without extensive evidence being produced that the propagation of noise (under all weather conditions) from this activity can be limited to existing background levels, at all receptors. In addition, the Parish Council would require that locomotives were powered 'off' during stabling.

Moreover, the Parish Council would expect EDF Energy to bring forward a comprehensive set of management controls to ensure that all movement of trains to and from any 'stabling location' could only commence (i.e. locomotive start/stop sequences) between the hours of 8:30am and 5:30pm (Monday to Friday) and 11:00am to 4:30pm at weekends (were they permitted).

2.4.4 KcC PC note the routing of the 'green rail route' and respect and support those directly and indirectly impacted, in making their views known.

2.4.5 KcC PC note EDF Energy's intent to construct the 'green rail route' early in the construction phase of The Project.

**ISSUE 11 - GREEN RAIL ROUTE PRE-INITIATION**

KcC PC are of the view that as materials transport to the Main Development and ancillary sites is such a critical issue to all residents, businesses and visitors along Coastal Suffolk, it is essential that **completion and operation of the 'green rail route' commences prior to any road freight being initiated (including heavy vehicles, materials, etc.)**.

2.4.6 KcC PC note the two options EDF Energy proposed at **Stage 3**.

2.4.7 KcC PC note EDF Energy are still considering responses made on the options proposed at **Stage 3**.

**c) Changes from Stage 3**

2.4.8 KcC PC note the physical details of the proposals made at **Stage 3** remain unaltered.

2.4.9 KcC PC note the change to train movements under the 'integrated' option (three trains per day at peak, comprising six movements) and under the rail-led (five trains per day, comprising 10 movements).

KcC PC once again draw EDF Energy's attention to the repeated inexactitude of this paragraph, in not being explicit about whether under the rail-led option, the five trains per day would be at peak. See **Issue 9** (above).

**2.5 Other rail improvements and changes to level crossings**

**a) Introduction**





- 2.5.1 KcC PC note that the required rail improvements under the road-led and rail-led options were outlined at **Table 8.1 of Volume 1, Chapter 8 of the Stage 3 Main Consultation Document**.
- 2.5.2 KcC PC note the summarised requirements for the rail-led option and the references out contained therein. KcC PC also note the development of another option for the LEEIE (**Option 3**), with more detail at **Chapter 5, Paras 5.5.1 to 5.5.4**
- 2.5.3 KcC PC note the very brief restatement of the rail dependencies and exclusions within the road-led strategy.
- 2.5.4 KcC PC note that the 'integrated' option *"...would involve each of these elements, with the exception of the upgrades to the East Suffolk line."*

Although not explicitly restated in 2.5.4, it is assumed that *"...would involve each of these elements..."* means the contents of 2.5.2 and 2.5.3 (excluding the East Suffolk line improvements).

#### **b) Proposed development**

##### **i) Sizewell Halt, rail siding or rail spur**

- 2.5.5 KcC PC note the proposals being considered by EDF Energy for the reconfiguration of LEEIE, specifically:
- **Figure 12.2** Sizewell Halt
  - **Figure 2.13** Rail Siding
  - **Figure 2.14** Rail Spur

KcC PC note the potential revisions and respect and support those directly and indirectly impacted, in making their views known.

- 2.5.6 KcC PC note the intention of EDF Energy to transfer materials delivered to the LEEIE to the Main Development Site by HGV. In the case of the road-led option, for the duration of the construction phase. Whilst under the rail-led and 'integrated' options, HGV transfer would continue until the green rail route is operational.

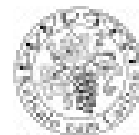
KcC PC are concerned that delivery of an operational green rail route could be delayed as a result of the LEEIE being utilised as an 'interim' solution. Consequently, under either the rail-led or 'integrated option, KcC PC reinforce the need to ensure that Main Development Site activity should not be permitted until an operational green rail route is delivered.

- 2.5.7 KcC PC note that except for the new rail spur option, details of the road-led and rail-lead proposals for the LEEIE are unchanged **from Stage 3**.
- 2.5.8 KcC PC note that EDF Energy are still considering the LEEIE options and welcome views on the new rail spur proposal.

KcC PC note the LEEIE proposals including the new rail spur and respect and support those directly and indirectly impacted, in making their views known.

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

- 2.5.9 KcC PC note the restatement of the **Stage 3** position regarding infrastructure upgrades and level crossing changes required for the rail-led option once the green rail route is operational.
- 2.5.10 KcC PC note some of the upgrades included in that proposal.
- 2.5.11 KcC PC note these upgrades are required for the rail-led option, but not for the road-led or 'integrated' options.
- 2.5.12 KcC PC note details of the works have not been changed since the **Stage 3** consultation. Moreover, KcC PC note EDF Energy's concern about Network Rail's ability to deliver the requirements within the parameters of The Project's programme.



**iii) Saxmundham to Leiston branch line changes to level crossings**

2.5.13 KcC PC note the EDF Energy description of the Saxmundham to Leiston branch line.

2.5.14 KcC PC note the EDF Energy reprise of their **Stage 3** position regarding required upgrades to the branch line.

2.5.15 KcC PC note these works will be required irrespective of the selected option (rail-led, road-led or 'integrated')

**ISSUE 12 – SAXMUNDHAM TO LEISTON BRANCH LINE**

In the event that approval is given, KcC PC (with parish residents across open fields at Clay Hills) could not support the proposal for the programme of upgrades to the Saxmundham to Leiston branch line without evidence being produced that the propagation of noise (under all weather conditions) from upgrade activity can be limited to existing background levels, at all receptors. In addition, the Parish Council would require that any locomotives or other mechanical aids servicing this work were powered 'off' during where constant mobility is not required.

Moreover, the Parish Council expect EDF Energy to bring forward a comprehensive set of management controls to ensure that all movement of trains to and from any upgrade work location could only be conducted between the hours of 8:30am and 5:30pm (Monday to Friday) and 11:00am to 3:00pm at weekends (were weekend working applied for and permitted).

KcC PC expect ongoing maintenance, upgrade and renewal activity should also observe these requirements.

2.5.16 KcC PC note the upgrades would be retained after completion of the construction stage.

**c) Changes from Stage 3**

2.5.17 KcC PC note the inclusion of a new rail spur proposal at the LEEIE.

2.5.18 KcC PC once again note the EDF Energy assertion that they are concerned about Network Rail's ability to deliver required improvements within The Project's programme.

KcC PC note that from the Coastal Suffolk resident point of view, there are also issues regarding the ability for road improvements to be delivered within The Projects programme, yet in these cases EDF Energy seemingly 'shrug their shoulders' and carry on regardless – utilising the overworked flag of convenience that works be carried out in "...the early years...".

**ISSUE 13 - RAIL AND ROAD DEPENDENCIES AND VULNERABILITIES**

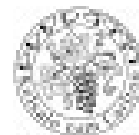
KcC PC regard the concerns being expressed by EDF Energy regarding the ability of Network Rail to perform a programme of improvements within The Project programme as a little disingenuous. It may well be that fulfilment of the required works do lay beyond what is probably an already heavily committed skilled labour pool.

However in comparison, having identified a relatively small array of required works to the A12 (and other elements of the local road network), EDF Energy continue to plan Main Site works from the 'get go', claiming any A12 and road network uplift work can be conducted in "...the early years...".

Whilst this too might be factually correct, it does however obscure the fact that during '...the early years...' residents, businesses, visitors, etc. will be inordinately inconvenienced, beyond that which even EDF Energy believe is sustainable.

Hence the schedule of required works being proposed by EDF Energy at both Stages 3 and 4.

2.5.19 Despite EDF Energy confirming the upgrades to the Saxmundham to Leiston branch line remain largely unchanged, KcC PC are concerned at the tone of this paragraph.



Specifically, the proposal that *"...in order to have control over the delivery of the necessary works, we now propose that the entire route of the Saxmundham to Leiston branch line (as shown at Figure 2.15) and all the land required to undertake the upgrade works would be included within the application red line. This includes extensions to the red line boundaries at five of the nine level crossings, to more accurately align with land ownership boundaries."*

This seems an incredibly high-handed attitude, and gives little or no detail in respect of any technical interconnect arrangements at the point of connection with the East Suffolk line, signalling interconnection, asset transfer arrangements, end state ownership, the application of (amongst others); appropriate construction and engineering standards, health and safety standards, etc.

Moreover, the final sentence *"This change of application boundary would mean that EDF Energy could deliver the upgrade works if necessary."* seems to break new ground in respect to conventional thinking in respect to compulsory purchase and components of what might be regarded as 'national infrastructure assets'.

#### **ISSUE 14 - SAXMUNDHAM TO LEISTON BRANCH LINE OWNERSHIP CLARITY**

KcC PC question whether this proposal is a prelude to the Saxmundham to Leiston branch line passing into private ownership?

KcC PC believe that the size and definition of the map at **Figure 2.15** is inadequate for the purposes of examining the proposals being made by EDF Energy. This is particularly unsatisfactory as the narrative talks of *"...extensions to the red line boundaries at five of the nine level crossings, to more accurately align with land ownership boundaries."*

## **2.6 Sizewell link road**

### **a) Introduction**

2.6.1 KcC PC continue to be mystified by the seemingly arbitrary cut off points that make the Sizewell link road necessary or indeed unnecessary.

The rail-led option with *"...up to 5 trains a day..."* does not require a Sizewell link road, yet the 'integrated' option with *"...up to 3 trains a day..."* does!

This lack of understanding is amplified because of the paucity of information from EDF Energy on the planned loading of each transport element throughout the course of the construction phase. This deficiency has been raised on several occasions and remains unanswered by EDF in all foregoing consultations.

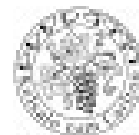
#### **ISSUE 15 – THE PAUCITY AND INCOMPLETENESS OF DATA**

EDF Energy continue to provide incomplete and unambiguous information on exactly how they propose to deliver an estimated 10.7 million tonnes of materials under each of their options (rail-led, road-led and 'integrated').

Despite requests from many consultees, EDF Energy have steadfastly avoided providing adequate data in the Pre-Application Consultation process. Consequently, consultees have effectively been prevented from making qualified comments or bringing forward suitably well calculated alternative proposals.

This undoubtedly represents a significant shortcoming of the EDF Energy consultation methodology and must be rigorously examined by the Planning Inspectorate during any ADCO.

2.6.2 KcC PC once again reiterate that the western end of the Sizewell link road joins the A12 at the northern boundary of Kelsale cum Carlton, **not** south of Yoxford.



- 2.6.3 KcC PC note that EDF Energy have not included HGV and LGV within the description of traffic using the proposed Sizewell link road, preferring instead to understate the issue referring only to “*...goods vehicles delivering freight to the...*”.

Whilst KcC PC understand that EDF Energy may wish to underplay the significance of major components of the likely traffic flow, it does seem petty to deliberately avoid naming them in the narrative, as done previously at **Stage 3**.

- 2.6.4 KcC PC note that EDF Energy focus on the alleviation of pre-existing traffic issues in Yoxford, Middleton Moor and Theberton but do not acknowledge the new impacts of their proposals, comprising (amongst others) the loss of; valuable good quality farming land, a myriad of important habitats, the peaceful enjoyment of householders in the north of Kelsale cum Carlton and the encircling of some households at Middleton Moor with traffic passing to the north (on the B1122) and the south (Sizewell link road).

**b) Proposed development**

- 2.6.5 KcC PC note the brief description of the proposed Sizewell link road. It also notes that EDF Energy do appear to have changed their position in retaining the B1122 as an alternative routing in the event of the link road being disrupted.

**ISSUE 16 - ROUTES, RESILIENCE AND INEXACTITUDE**

The Sizewell link road appears to be uniquely positioned within the EDF Energy proposals insofar as EDF Energy have declared their intention to utilise the B1122 if the Sizewell link road is disrupted or closed.

However, EDF Energy have been and continue to be reticent in declaring what alternative arrangements they plan in the event of a portion of the A12 (the only declared routing of HGV construction traffic) becoming inoperable as the route to the Main Development site.

Once again, this omission by EDF Energy prevents consultees from having a full picture of the likely impacts of The Project.

- 2.6.6 KcC PC notes **Figures 2.16-2.21** giving overhead views of the proposed link road development. What the figures demonstrate is the intrusive nature of the proposal, passing through historic hedge and ditched farmland, interspersed with small forested pockets offering both valuable habitats and green corridors for migratory animals (e.g. the migration of red deer from west of Kelsale cum Carlton to the heaths in the east).

It also fails to demonstrate effectively the geography of the route, the watercourses and topography.

- 2.6.7 KcC PC once again reiterate that the western end of the Sizewell link road joins the A12 at the northern boundary of Kelsale cum Carlton, **not** south of Yoxford **Figures 2.16 & 2.17 refer**.

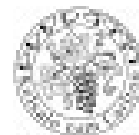
- 2.6.8 KcC PC note the stopping up of Littlemoor Road **Figures 2.18 & 2.19 refers**.

- 2.6.9 KcC PC vehemently oppose the proposed junction of Fordley Road with the Sizewell link road, should Development Consent be given **Figure 2.19 refers**.

To do so would invite the creation of a ‘rat run’ where the only southern routes would be via largely single-track roads, some with little or no passing places:

- A] North Green and onward to the A12 at Mile Hill** - along Fordley Road passing a designated roadside nature reserve, over an automatic level crossing, a right angle partially blind, right turn into Town Farm Lane, continuing through a narrowing twisty section and onward to a T junction with the A12.

**Note:** Large farm vehicles based on Town Farm Lane and accessing surrounding fields.



- B] Tiggins Lane onward to Main Road Kelsale through the Kelsale Village Centre Conservation Area** - along Fordley Road passing a designated roadside nature reserve, an automatic level crossing over the East Suffolk Line, enter Tiggins Lane off of a blind 90 degree bend, pass a private nature reserve, two roadside nature reserves and passing through the northern perimeter of the Kelsale Village Centre Conservation Area (liable to seasonal flooding), prior to joining Main Road at a partially blind T junction.

**Note:** Large farm vehicles accessing Town Farm land along length of Tiggins Lane.

- C1] Butchers Road and onward to Kelsale Village Centre Conservation Area** - along Fordley Road passing a designated roadside nature reserve, an automatic level crossing over the East Suffolk Line, a blind 90 degree left turn followed almost immediately by a largely blind 90-degree right hand turn, downhill through a short blind twisty section (liable to seasonal field run-off and/or formation of sheet ice on corner), to a narrow T junction with splitting island into; via the right hand fork, Bridge Street entering the designated Kelsale Village Centre Conservation Area, over a narrow bridge and on through a residential area to a crossroads at Main Road (Kelsale).

**Note:** Large farm vehicles accessing Town Farm and, Rogman Farm land along length of Butchers Road and Boundary Farm land along Fordley Road at North Green Crossing.

- C2] Alternatively Butchers Road and onward to Hawthorn Road via Lowes Hill** - along Fordley Road passing a designated roadside nature reserve, an automatic level crossing over the East Suffolk Line, a blind 90 degree left turn followed almost immediately by a largely blind 90-degree right hand turn, downhill through a short blind twisty section (liable to seasonal field run-off and/or formation of sheet ice on corner), to a narrow T junction with splitting island into; via left hand fork, up Lowes Hill to a 7.5 tonne weight limited humpback bridge over the East Suffolk Line, through a short blind twisting section, to a largely blind 90-degree right turn into a very narrow twisting section of single track (liable to seasonal flooding) with the organic Maple Farm and Farm Shop to left, continuing on to a partially blind T junction with Hawthorn Road, the site on a non-designated heritage asset (historic fingerpost).

**Note:** Large farm vehicles accessing Town Farm, Rogman Farm, Bridge Farm and Maple Farm land along the whole route.

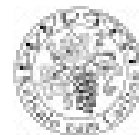
- D] East Green onward to Lowes Hill and then Hawthorn Road** - along Fordley Road passing a designated roadside nature reserve, an automatic level crossing over the East Suffolk Line, a blind 90 degree left turn followed almost immediately by a largely blind 90-degree right turn, with a manual level crossing (ring Saxmundham signal-box) over the East Suffolk Line straight ahead, giving access to East Green. Onto East Green, a very narrow single track to another largely blind 90-degree bend to the right, continuing on a long straight single track road, into a partially blind right hand turn with immediate T junction to Lowes Hill, turn left into a very narrow twisting section of single track (liable to seasonal flooding) with the organic Maple Farm and Farm Shop to left, continue to a partially blind left turn at entrance to 'By The Crossways', another twisty section leading to partially blind T junction with Hawthorn Road, the site on a non-designated heritage asset (historic fingerpost).

**Note:** Large farm vehicles accessing Rubblestone, Rogman, Boundary and Maple Farms land along the route.

#### **ISSUE 17 - SINGLE TRACK LANE 'RAT-RUNS', NATURE RESERVES, CONSERVATION AREA & HERITAGE ASSETS (PART 1)**

KcC PC vehemently oppose the proposed junction of Fordley Road with the Sizewell link road, should an ADCO be made and agreed.

To do so would invite the creation of 'rat runs' where the only southern routes would be via largely single-track roads, some with little or no passing places. See **A-D (above)** for brief descriptions of the issues associated with the creation of a link with Fordley Road and the proposed Sizewell link road.



## **ISSUE 17 - CONTINUED**

In the event that a Development Consent Order is granted, KcC PC require consultation on each of the routes to facilitate mandatory 'access only' traffic control measures on each of these, not only during construction, but also through operation and decommissioning phases, or until the Sizewell link road is removed (whichever is the latter).

KcC Parish Council have also consulted with residents impacted by this proposal but not living within the KcC Parish, to understand their concerns. Largely but not exclusively, the residents immediately impacted by this proposal and living on Fordley and Littlemoor Roads share the concerns of KcC PC and are making their own representations at Stage 4.

In addition, KcC PC give notice that they will seek to require EDF Energy to indemnify the Parish Council against any damage to the Kelsale Village Centre Conservation Area, trees & hedges, roadside nature reserves and non-designated heritage assets along the described routes, howsoever caused, during the entire lifecycle of Sizewell C."

2.6.10 KcC PC note the intention to form junctions with the Sizewell link road at Trust Farm **Figure 2.19 refers.**

2.6.11 KcC PC note the proposed reconfiguration of B1122, existing junctions, islands and the B1125 extension to form suitable new junctions **Figure 2.20 refers.**

2.6.12 KcC PC vehemently oppose the proposed junction of Pretty Road with the Sizewell link road and/or a Theberton bypass, should Development Consent be given to **Figure 2.20 refers.**

To do so would create a 'rat run' where the eastern exits would be either via Kelsale Village Centre Conservation Area or Clay Hills onto Main Road Kelsale, near the Primary School and a vulnerable persons sheltered housing development.

KcC PC are very concerned that even without disruption to the A12 and/or the Sizewell link road, the Pretty Road, Hawthorn Road, Clay Hills route would become a heavily abused cut-through.

**E] Proposed Pretty Road Junction to Main Road Kelsale via Clay Hills** - along Pretty Road through Theberton Woods (Red Deer migration route), sharp left (partially blind) turn into Hawthorn Road passing organic beef farm at Peakhill Farm, past Moat Road junction on left, past Harrow Lane junction on left, into dip with right turn (subject to seasonal flooding), up incline through narrow section, passing Organic vegetable & free range chicken egg Farm at Maple Farm on right, followed quickly by blind junction with East Green/Lowes on right, the site on a non-designated heritage asset (historic fingerpost). Immediately approaching blind junction with Saxmundham Road where Cemex cement lorries enter and emerge. 90 degree blind right turn into Clay Hills (subject to seasonal flooding), down Clay Hills (with passing places for larger traffic) passing Suffolk County Wildlife Site to right then left turn over East Suffolk Line bridge. Continue down Clay Hills crossing narrow bridge over the Fromus, up incline to T junction with Main Road Kelsale (B1121). Three options a) left onto B1121 into Saxmundham town centre b) right onto B1121 to junction with A12 at Dorley's Corner passing Kelsale Village Centre Conservation Area to right c) right onto B1121 and then immediately left onto weight restricted (7.5T) Carlton Road, with vulnerable persons sheltered housing and Primary School to left and elderly housing to right. Continue on Carlton Road (morning and afternoon school drop off and pick up permitting), through residential area, passing play area, into dip with blind junction crossroads (Sandy Lane and Rosemary Lane), up incline and then down to A12 T Junction Southbound to the left, northbound to the right and Peasenhall to right and immediate left off of A12.

**Note:** Large farm vehicles use the full extent of the route to access cultivated farmland to the north and south.

**F] Proposed Pretty Road Junction to Main Road Kelsale via Lowes Hill and the Kelsale Village Centre Conservation Area** - along Pretty Road through Theberton Woods (Red Deer migration route), sharp left (partially blind) turn into Hawthorn Road passing Organic beef farm at Peakhill Farm, past Moat Road





junction on left, past Harrow Lane junction on left, into dip with right turn (subject to seasonal flooding), up incline through narrow section, passing Organic vegetable & free range chicken egg Farm at Maple Farm on right. Then right turn into blind junction with East Green/Lowes Hill, the site on a non-designated heritage asset (historic fingerpost), through narrow twisty section, passing Maple Farm (Organic) and Farm Shop on right, onto narrowing dip (subject to seasonal flooding) past East Green turn on right, into Lowes Hill via blind 90 degree turn to left. Down narrowing Lowes Hill, through blind twisty section, passing Bridge Farm to right and onto 7.5T weight limited humpback bridge over East Suffolk line. Continue down narrowing Lowes Hill taking a partially blind left turn at the foot of the hill (where a turning up Butchers Road is to the left), entering the Kelsale Village Centre Conservation Area. Continue passing recreation ground to right, up incline to T junction with Main Road Kelsale (B1121). Three options a) left onto B1121 into Saxmundham town centre b) right onto B1121 to join A12 to north of Kelsale cum Carlton c) cross B1121 into Rosemary Lane (single track road with three 90 degree blind and partially blind corners leading to a blind T junction with Main Road Carlton).

**Note:** Large farm vehicles use the full extent of the route to access cultivated farmland to north, south & west.

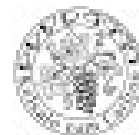
- G] Proposed Pretty Road Junction to A12 via Lowes Hill, East Green, Butchers Road, Tiggins Lane and Town Farm Lane** - along Pretty Road through Theberton Woods (Red Deer migration route), sharp left (partially blind) turn into Hawthorn Road passing Organic beef farm at Peakhill Farm, past Moat Road junction on left, past Harrow Lane junction on left, into dip with right turn (subject to seasonal flooding), up incline through narrow section, passing Organic Vegetable and Free Range egg Farm at Maple Farm on right. Then right turn into blind junction with East Green/Lowes Hill, the site on a non-designated heritage asset (historic fingerpost), through narrow twisty section, passing Maple Farm (organic) and Farm Shop on right, onto narrowing dip (subject to seasonal flooding). Before the blind 90 degree left hand turn, take a turn to the right onto East Green, following the single track lane to the end, following the road left at a blind 90 degree corner, down narrowing lane to a manual level crossing (ring Saxmundham signal-box) over the East Suffolk Line straight ahead. Cross level crossing straight on into Butchers Road. At, end turn right at 90 degree blind corner onto Tiggins Lane, at partially blind left hand turn, enter Town Farm Lane, continue through a narrow twisty section and onward to a T junction with the A12. Two options a) left onto A12 southbound b) right across flow onto A12 northbound.

**Note:** Large farm vehicles use the full extent of the route to access cultivated farmland to north, south & west.

- H] Proposed Pretty Road Junction to Sizewell link road via Lowes Hill, Butchers Road, Tiggins Lane and Fordley Road** - along Pretty Road through Theberton Woods (Red Deer migration route), sharp left (partially blind) turn into Hawthorn Road passing Organic beef farm at Peakhill Farm, past Moat Road junction on left, past Harrow Lane junction on left, into dip with right turn (subject to seasonal flooding), up incline through narrow section, passing Organic Vegetable and Free Range egg Farm at Maple Farm on right. Then right turn into blind junction with East Green/Lowes Hill, the site on a non-designated heritage asset (historic fingerpost), through narrow twisty section, passing Maple Farm (organic) and Farm Shop on right, onto narrowing dip (subject to seasonal flooding) past East Green turn on right, into Lowes Hill via blind 90 degree turn to left. Down narrowing Lowes Hill, through blind twisty section, passing Bridge Farm to right and onto 7.5T weight limited humpback bridge over East Suffolk line. Continue down narrowing Lowes Hill taking a partially blind right turn at the foot of the hill into Butchers Road. Continue up Butchers Road through the narrowing twisty section (liable to seasonal field run-off and/or formation of sheet ice on corner). Continue up the hill, passing kennels and level crossing to right, following the road to the left via a 90 degree partially blind corner, followed almost immediately by a blind 90 degree right hand bend into Tiggins Lane. Follow road over automatic level crossing over the East Suffolk Line, passing through a roadside nature reserve on both sides. Continue on Fordley Road, down the hill, past the Littlemoor Road junction to the left and onto the proposed Sizewell link road T junction.

**Note:** Large farm vehicles use the full extent of the route to access cultivated farmland in all directions.





**ISSUE 18 - SINGLE TRACK LANE 'RAT-RUNS', NATURE RESERVES, CONSERVATION AREA & HERITAGE ASSETS (PART 2)**

KcC PC vehemently oppose the proposed junction of Pretty Road with the Sizewell link road or the Theberton Bypass, should Development Consent be given for either.

To do so would invite the creation of 'rat runs' where the only eastern routes would be via largely single-track roads, some with little or no passing places. See **E-H (above)** for brief descriptions of the issues associated with the creation of a link with Pretty Road and the proposed Sizewell link road or Theberton Bypass.

In the event that a Development Consent Order is granted, KcC PC require consultation on each of the routes to facilitate mandatory 'access only' traffic control measures on each of these, not only during construction, but also through operation and decommissioning phases, or until the Sizewell link road is removed (whichever is the latter).

KcC Parish Council have also consulted with residents impacted by this proposal but not living within the KcC Parish, to understand their concerns. Largely but not exclusively, the residents immediately impacted by this proposal and living on Fordley and Littlemoor Roads share the concerns of KcC PC and are making their own representations at Stage 4.

In addition, KcC PC give notice that they will seek to require EDF Energy to indemnify the Parish Council against any damage to the Kelsale Village Centre Conservation Area, trees & hedges, roadside nature reserves and non-designated heritage assets along the described routes, howsoever caused, during the entire lifecycle of Sizewell C."

- 2.6.13 KcC PC note the intention to create a new junction to at Moat Road to "...*maintain access to existing properties...*". As in **2.6.9 and 2.6.12 (above)** KcC PC are concerned that an unintended consequence of this action may create a 'rat run' reducing a quiet single track road to a potential race track. However, KcC PC recognise that Moat Road is a less direct route than the previous two. Consequently, KcC PC look to EDF Energy to work with the residents, Theberton Parish Council and KcC PC to agree and implement measures to limit the risk of Moat Road being widely abused.

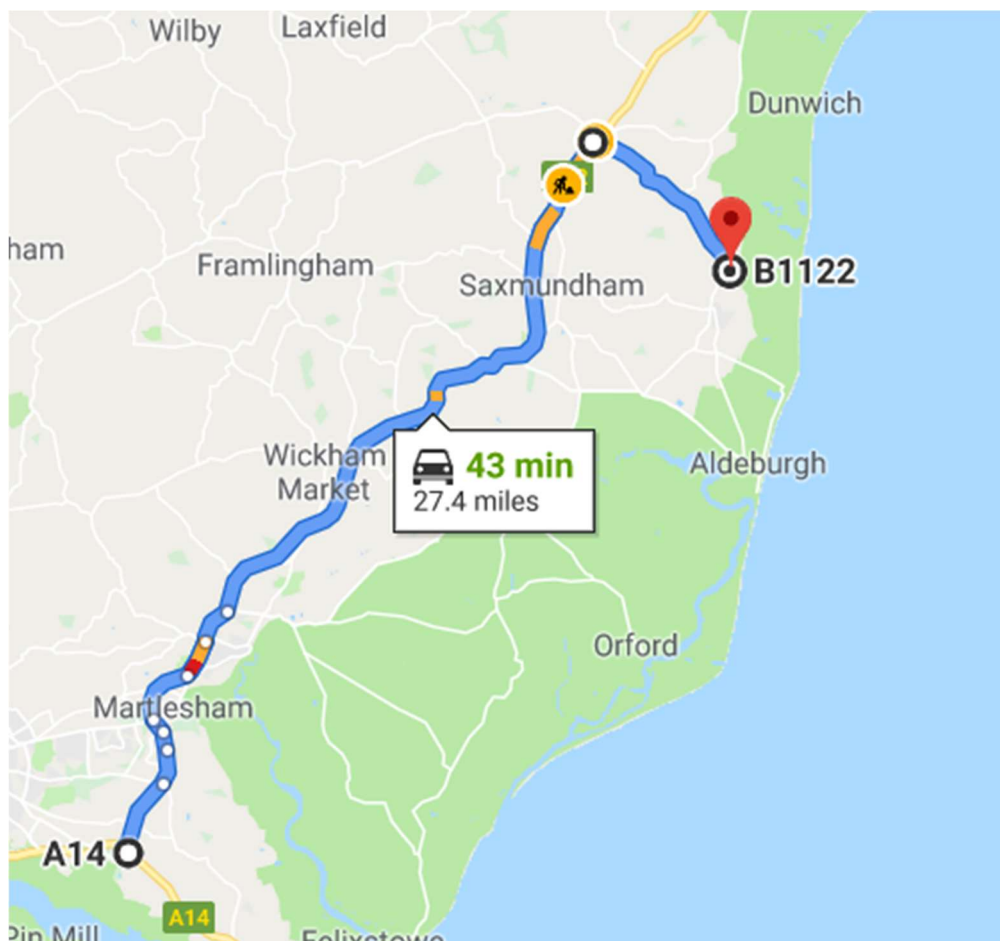
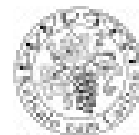
For example; restricted width measures (in consultation with landowners and/or farmers), physically dividing Moat Road into an 'access only' road to the properties from the eastern end and a 'no through road' from the western end, etc.

- 2.6.14 KcC PC note EDF Energy referring out to **Volume 1, Chapter 10 of the Stage 3** Main Consultation Document for more detail.

**c) Changes from Stage 3**

- 2.6.15 KcC PC note with deep regret EDF Energy continue to promote the damaging proposal for a Sizewell link road at the northern border of Kelsale cum Carlton and that the route remains unchanged since **Stage 3**. Particularly as little detailed impact analysis had been completed at **Stage 3** and the **PEI** was demonstrably inadequate.
- 2.6.16 KcC PC note EDF Energy continue to peddle the myth portrayed at **Stage 3** and repeated at **Stage 4**, that their development proposals are designed to minimise the detrimental impacts on Coastal Suffolk; residents, businesses, visitors and the environment.

However, despite EDF Energy still not quantifying the total number of vehicle movements required to construct Sizewell C, it is self-evident that the route 'Z' into the Main Development Site, whilst being shorter than the B1122, is still considerably longer than necessary. (see **Figure KcC 1** below)



**Figure KcC 1**

Consequently, as EDF Energy persist in taking a minimum of 85% of HGV traffic well north of Saxmundham (along with associated; cars, LGVs and bus traffic), KcC PC believe this is unnecessarily detrimental to all of the foregoing interests when compared to routing traffic east off of the A12 south of Saxmundham (estimated minimum net saving of 6 miles per delivery (3 miles per HGV movement)).

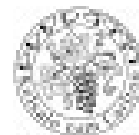
Moreover, in doing so EDF Energy would be also be providing a tangible legacy for Coastal Suffolk, something that is woefully lacking under the current proposals.

- 2.6.17 KcC PC note the assertion made by EDF Energy (but unsupported by any evidence) that “...analysis undertaken...since Stage 3, of criteria including the relief each route would provide to communities on the routes from the A12 to the main development site, route length, transport policy, engineering impact and other environmental topics (including potential effects on PRoWs, local road character, heritage assets, landscape designations, landscape character and views, and residential amenity), supports our selection of Route Z as the most appropriate option.”

KcC PC are concerned that unevidenced assertions have been made by EDF Energy throughout the Pre-application Consultation process and conclude that this is by design, in order that any evidence (if it exists at all) will only be made available when an ADCO is made, thereby leaving local communities heavily disadvantaged in being able to make effective representations to the Planning Inspectorate and on to the Secretary of State.

#### **ISSUE 19 - UNEVIDENCED ASSERTIONS**

KcC PC are concerned that unevidenced assertions have been made by EDF Energy throughout the Pre-application Consultation process (**Para 2.6.17** being the latest) and conclude that this is by design, in order that any evidence (if it exists at all) will only be made available when an ADCO is made, thereby leaving local communities disadvantaged in being able to make effective representations to the Planning Inspectorate and thereby the Secretary of State.



- 2.6.18 KcC PC believe EDF Energy are being disingenuous describing *"The point that Route Z connects with the A12..."* as being located *"...away from existing settlements..."* when immediately adjacent to the planned roundabout and associated contractor compound, there are a selection of properties comprising long standing dwellings, small businesses and artistic enterprises.

KcC PC accept that these properties may not constitute a town, village or perhaps even a hamlet, but given the location is a predominantly an agricultural rural area, they most certainly are a 'settlement' and have been for many years.

KcC PC also contend that whilst Route Z may be (subject to survey evidence) the *"...shortest route of the options considered..."*, if consideration is given to the unnecessarily long run of the A12 included in this route from the junction with the A14 to the south, this is **most certainly not a short route for at least 85% of the projected HGV traffic** (plus LGVs, cars and buses).

KcC PC are also unclear what evidence there is to support the EDF Energy claim that this route *"...minimises the effect on the existing road network..."* as **no specific 'effect' or 'effects' are defined by EDF Energy.**

KcC PC are unable to understand the meaning of *"...and is most related to the communities on the B1122 that it the Sizewell link road seeks to relieve."* and would welcome the services of an EDF Energy staff interpreter of gobbledegook!

KcC PC have attempted to unpick the last sentence of this paragraph and seek confirmation from EDF Energy that their interpretation is correct:

*"...there is potential for the significance of several heritage assets to be affected..."*

**KcC PC interpretation – EDF Energy understand they will wilfully diminish the 'value' of some heritage assets**

*"...and localised effects on the amenity of residents..."*

**KcC PC interpretation – EDF Energy understand they will wilfully diminish the lives of residents**

*"...it would be the least intrusive option overall in terms of engineering impact..."*

**KcC PC interpretation – it will be the cheapest option for EDF Energy**

*"...and it remains our conclusion that it represents the most appropriate route."*

**KcC PC interpretation – ...and we've got the B1122 as an alternative route if it gets disrupted!**

- 2.6.19 KcC PC note that further design development has been undertaken since **Stage 3** and that as a result the land area required has changed.

This reinforces assertions made by KcC PC at Stage 3 that:

- the link road proposal was not thoroughly thought through...
- ...and lacked a detailed understanding of the site and routing.
- Had a totally inadequate PEI...
- ...that was incomplete and was largely a desk based exercise.

- 2.6.20 KcC PC note the summarised proposed changes being made by EDF Energy at **Stage 4**:

- minor (almost trivial) reduction in the 'land take' at Fir Tree Farm
- inclusion of a PROW within the red line boundary, to facilitate physical improvement
- removal of a residential property at Fordley Road from the boundary
- Fordley Road being stopped up north of the link road



- Stopping up Littlemoor Road
- new road link to Trust Farm
- making the alignment around Theberton in a deeper cut to enable bridging of Pretty Road over the link
- inclusion of additional stretches of Pretty Road
- inclusion of a PRow to facilitate physical improvement

KcC PC draw EDF Energy's attention to comments at **Paras 2.6.9, 2.6.12 & 2.6.13** in respect to some these proposed changes.

- 2.6.21 KcC PC note further details of these changes are at **Chapter 6** of this **Stage 4** consultation and will comment accordingly.
- 2.6.22 KcC PC support the complete removal of the Sizewell link road (should it be approved) on or before completion of the construction phase of Sizewell C, with the assurance that it will be returned to fully functioning agricultural land of the same or improved standard, set in a landscape of similar features and habitats to those **existing in 2019-21**.

KcC PC believe that to achieve this it is essential that the entire route should be fully surveyed, catalogued, recorded and independently audited prior to the commencement of any works being initiated. Moreover, this should be a specific obligation under the terms of any ADCO.

#### **ISSUE 20 - SIZEWELL LINK ROAD WARRANTY, REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

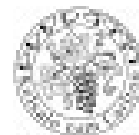
## **2.7 Theberton Bypass**

### **a) Introduction**

- 2.7.1 KcC PC note the introduction by EDF Energy, noting *"...reduction in noise...and severance impacts..."* and wonder whether this should recognise that noise will not be reduced, instead it will likely increase and be relocated to other parts of Theberton Parish. Likewise, with a significantly wider road (in the form of the bypass) and greater volumes of traffic, severance will impact different people, more radically in different parts of the Theberton Parish.
- 2.7.2 KcC PC note that the Theberton bypass will only be progressed in isolation as part of the rail-led strategy.

### **b) Proposed development**

- 2.7.3 KcC PC note **Figure 2.22** describe the planned route of a new single carriageway road to the south-west of Theberton Parish.
- 2.7.4 KcC PC note that a standalone Theberton Bypass and the Sizewell link road integrated bypass of Theberton are not configured identically.
- 2.7.5 KcC PC note the described route and interconnections to Pretty and Moat Roads.
- 2.7.6 KcC PC note the EDF Energy **referencing Volume 1, Chapter 11 of the Stage 3** Main Consultation Document for further details.



**c) Changes from Stage 3**

- 2.7.7 KcC PC note that EDF Energy state *"The route of the Theberton bypass as proposed in this Stage 4 consultation has not changed since Stage 3."*
- 2.7.8 KcC PC note EDF Energy confirm the changes at Area 4 which can be summarised as a deeper cut to facilitate a bridging of the bypass at Pretty Road (for non-motorised traffic) and a larger 'land take' to facilitate this bridging.

**ISSUE 21 - THEBERTON BYPASS WARRANTY, REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

**2.8 Two village bypass**

**a) Introduction**

- 2.8.1 KcC PC note the summarised history of this development and EDF Energy's assertion that it is required as a component of their 'integrated' option.

**b) Proposed development**

- 2.8.2 KcC PC note the revised development at **Figure 2.23**, including the increased 'land take' for a new four arm roundabout at the south west extreme of the development.
- 2.8.3 KcC PC note the local roads and PRoWs that the route crosses as described at **Figure 2.23**.
- 2.8.4 KcC PC note EDF Energy referencing **Volume 1, Chapter 12 of the Stage 3** Main Consultation Document for further details.
- 2.8.5 KcC PC note that this development is permanent and will not be removed on the completion of the construction phase.

**c) Changes from Stage 3**

- 2.8.6 KcC PC note that EDF Energy are unwilling to commit to the current proposal being *"...the most appropriate option."*
- 2.8.7 KcC PC note that EDF Energy are still proposing minor changes (subject to Stage 4 responses and further surveying work) and is surprised that something with such a protracted gestation period, continues to be subject to 'survey'.

KcC PC is also surprised at the scale of some of the *"...minor changes..."* including;

- *"...the repositioning of the western roundabout"*
- the increased 'land take' to accommodate flood compensation land
- further 'land take' at Tinker Brook

and several other increases to 'land take' at different locations, further extending the development boundary.

- 2.8.8 KcC PC note EDF Energy referencing **Chapter 6 of the Stage 4** documents, for further details of these changes.



## **ISSUE 22 - TWO VILLAGES BYPASS REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

### **2.9 Northern park and ride (Darsham)**

#### **a) Introduction**

2.9.1 KcC PC note EDF Energy's assertion that the Northern park and ride at Darsham demonstrates their commitment to reducing traffic generated by the construction of Sizewell C.

2.9.2 KcC PC note that (unfortunately) EDF Energy's strategy for transporting The Project workforce has not changed since **Stage 3**, despite continued appeals by local communities to take stronger policy driven actions to reduce absolute traffic volumes (i.e. enforced car sharing thresholds significantly higher than those proposed by EDF Energy).

KcC PC note despite previous assertions, EDF Energy have bought forward more *"...minor alterations..."* at **Stage 4** (noting EDF Energy had previously not accepted a need for further consultation).

2.9.3 KcC PC note that the Northern park and ride is a required component irrespective of which option is pursued.

2.9.4 KcC PC note the location and size (29ha) of the development.

#### **b) Proposed development**

2.9.5 KcC PC note the description of the development described and at **Figure 2.24**

2.9.6 KcC PC note EDF Energy's strategy to keep any necessary structures as close to the Darsham Railway structures to the south of the site as possible.

2.9.7 KcC PC note EDF Energy referencing **Volume 1, Chapter 13 of the Stage 3** Main Consultation Document for further details.

2.9.8 KcC PC note that it is the intention of EDF Energy to remove all structures and infrastructure at completion of The Project construction phase and return the site to agricultural use.

KcC PC believe that to achieve this it is essential that the entire development should be fully surveyed, catalogued, recorded and independently audited prior to the commencement of any works being initiated. Moreover, this should be a specific obligation under the terms of ADCO.

2.9.9 KcC PC note that like other developments, EDF Energy are still proposing minor changes as part of the **Stage 4** consultation, a consultation stage that EDF Energy had said would not happen as it was not necessary.

2.9.10 KcC PC note that despite saying *"...the overall scale and composition...remains unchanged."*, the proposed changes include alterations to 'the red line boundary' and increased 'land take' to the north of the roundabout, resulting from increasing the diameter of the roundabout.

2.9.11 KcC PC note EDF Energy referencing **Chapter 6 of the Stage 4** documents, for further details of these changes.

## **ISSUE 23 - NORTHERN PARK & RIDE REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards for highway changes, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?





## **2.10 Southern park and ride (Wickham Market)**

### **a) Introduction**

- 2.10.1 KcC PC note EDF Energy's assertion that the Southern park and ride at Wickham Market demonstrates their commitment to reducing traffic generated by the construction of Sizewell C.
- 2.10.2 KcC PC note that the Southern park and ride is a required component irrespective of which option is pursued.
- 2.10.3 KcC PC note the location and size (18ha) of the development.

### **b) Proposed development**

#### **i] The southern park and ride site**

- 2.10.4 KcC PC note the description of the development described and at **Figure 2.25**
- 2.10.5 KcC PC note EDF Energy's strategy to keep any necessary structures away from the north and north-eastern parts of the site.
- 2.10.6 KcC PC note that it is the intention of EDF Energy to remove all structures and infrastructure at completion of The Project construction phase and return the site to agricultural use.  
  
KcC PC believe that to achieve this it is essential that the entire development should be fully surveyed, catalogued, recorded and independently audited prior to the commencement of any works being initiated.  
  
Moreover, this should be a specific obligation under the terms of any ADCO.
- 2.10.7 KcC PC note EDF Energy referencing **Volume 1, Chapter 14 of the Stage 3** Main Consultation Document for further details.

#### **ISSUE 24 - SOUTHERN PARK & RIDE REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards for highway changes, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

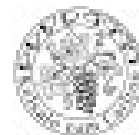
#### **ii] Wickham Market congestion mitigation**

- 2.10.8 KcC PC note EDF Energy's identification of increased congestion in Wickham Market resulting from the development of the Southern park and ride. KcC PC have also noted two options brought forward at **Stage 3** by EDF Energy with a modicum of surprise and incredulity.

#### **iii] Changes from Stage 3**

- 2.10.9 KcC PC note that like other developments, EDF Energy are still proposing minor changes as part of the **Stage 4** consultation - a consultation stage that EDF Energy had previously said would not happen as it was not necessary.
- 2.10.10 KcC PC note that despite saying, "*The overall scale and composition...remains unchanged.*", the proposed changes include alterations to '*...the red line boundary...*' and increased 'land take' to "*...facilitate pedestrian and cycle improvements...*".
- 2.10.11 KcC PC note and welcome EDF Energy bringing forward a proposal (albeit late in the process) at **Stage 4** to work with Wickham Market Parish Council to develop a public realm improvement scheme within the public highway, consistent with their Neighbourhood Plan initiative.
- 2.10.12 KcC PC note EDF Energy referencing **Chapter 6** of the **Stage 4** documents, for further details of these changes.





## **2.11 Freight Management Facilities**

### **a) Introduction**

2.11.1 KcC PC note EDF Energy's rather understated comment regarding *"...movements of large amounts of building materials, equipment, and resources..."*, understanding **the estimate at Stage 3 to be 10,700, 000 tonnes.**

KcC PC also note that EDF have a **'VISION'** that is *"...to deliver The Project so that adverse transport effects on the environment and local communities are limited through mitigation before they arise..."* with what is now the normal sting in the tail *"...where reasonably practicable."*

KcC PC believe that there is little in the EDF Energy consultations that evidence this *"...vision..."* to be anything more than a PR fig-leaf, for EDF Energy to hide behind.

### **ISSUE 25 - TRAFFIC DATA DEFICIENCY**

As raised earlier in this response, EDF Energy have done little to take real actions that would 'avoid' many impacts on the environment and local communities.

They have consistently:

- 'fudged' the scale of the road conveyed portion of 10,700,000 tonnes that will fall squarely on a largely unmodified A12.
- failed to identify proposals for alternative routing (other than the B1122) for construction traffic in the event of portions of the A12 or B1122 becoming unavailable in either the short or long term.
- failed to accept higher targets for car sharing, enforceable by policy and policing
- failed to provide a total projected vehicle movement figure for the entire construction phase, let alone clarity of how it is composed (Heavy vehicles, HGV, LGV, buses, cars, motorcycles, etc.)
- failed to quantify the projected total 'diesel' miles/kilometres for the entire construction phase
- failed to quantify the total 'road vehicle' pollutant output of the entire construction phase, identifying from where it will originate and how it will propagate across Coastal Suffolk
- failed to provide the projected origin of construction materials and the potential issues likely to arise on the road network outside of the immediacy of the eastern A12 and A14 road network.

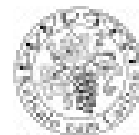
The latter being a matter of grave concern to Coastal Suffolk businesses, residents and visitors, as with the A12 likely to be very congested over the total construction period, users will need to effectively pre-plan routing and journeys carefully, in order to avoid concomitant congestion elsewhere.

KcC PC fail to understand how EDF Energy can claim to have the 'Vision' if they have not baselined these and many other metrics for the construction phase.

Moreover, if they have indeed got this baseline, why are they not sharing it and showing how EDF Energy's initiatives are demonstrably active in *"mitigation before they arise..."*?

2.11.2 KcC PC note that EDF Energy talk of the road-led strategy requiring a freight management facility because it *"...involves more road based transport..."*, leading KcC PC to ask more than what? What is the threshold?

KcC PC note that EDF Energy state *"This will enable us to regulate the timing and flow of vehicles to the Sizewell construction site, in conjunction with a Delivery Management System."* . However, KcC PC (in the absence of any



advice from EDF Energy to the contrary) fail to understand how other vehicles (i.e. LGV up to 3.5 tonnes) will be effectively managed without the FMF also dealing with them?

Moreover, at Stage 3 it was made clear not all traffic (including HGV) would be exclusively routed from the southern end of the A12, leading KcC PC to ask what provision is being made for HGV traffic arriving from the northern A12 approach and where will they lay-up?

#### **ISSUE 26 - PRO-ACTIVE TRAFFIC MANAGEMENT**

Despite being asked at Stage 3, EDF Energy has not revealed how HGV and other traffic leaving the Sizewell Construction site will be effectively managed, leading KcC PC to conclude that EDF energy are not concerned with empty HGV movements and intend a 'free for all' on the A12 to be allowed to develop. KcC PC ask EDF Energy to confirm this believe or bring forward details on the intended strategy.

KcC PC note that EDF Energy limit the FMF influence to *"...peak or sensitive hours..."* without defining exactly what they mean by these terms. KcC PC call on EDF Energy to bring forward their proposed interpretation of both *"peak"* and *"sensitive"* hours.

2.11.3 KcC PC note that EDF Energy do not propose a FMF for the rail-led strategy, but do propose one for the 'integrated' option, leading KcC PC to ask where the cut-off comes given that:

Road-led **with FMF** – **375** up to 575 HGV deliveries per day

'Integrated' **with FMF** – **325** up to 500 HGV deliveries per day

Rail-led **no FMF** – 225 up to **350** HGV deliveries per day

#### **b) Proposed development**

2.11.4 At Stage 3 KcC PC asked a number of questions regarding the inbound and Sizewell bound routing of HGV traffic using one or other of the proposed FMFs.

EDF Energy have provided little or no further information at Stage 4, save increasing their 'land take' to facilitate use of the proposed sites.

#### **ISSUE 27 - FMF ROUTES**

KcC PC call on EDF Energy to disclose their full proposals for the establishment and operation of a FMF at both proposed sites put forward at Stage 3. This must include full details of inbound and outbound routes to the FMF and the controls in place to mitigate the issues raised at Stage 3.

2.11.5 KcC PC note the description of the development described and at **Figure 2.27**

2.11.6 KcC PC note EDF Energy's intention to use access off the Old Felixstowe Road, but is concerned that **Figure 2.27** does not show *"...access from Felixstowe Road centrally on the southern boundary..."* instead it shows access at the western end of the site.

2.11.7 KcC PC note the increased 'land take' of the Stage 4 Consultation Boundary to *"provide the flexibility to provide a ghost island junction to accommodate right-turning HGVs."* Once again EDF Energy provide an ambiguous narrative as it does not clearly state whether the right-turning HGV is one leaving the FMF going north-west, or an approaching HGV from the south-east turning across the flow.

2.11.8 KcC PC note the description of the 9ha development described and at **Figure 2.28**

KcC PC also note the increased 'land take' to facilitate required visibility splays



- 2.11.9 KcC PC also note that the chosen site will be returned to agricultural use at the conclusion of the construction phase. KcC PC believe that to achieve this it is essential that the entire development should be fully surveyed, catalogued, recorded and independently audited prior to the commencement of any works being initiated. Moreover, this should be a specific obligation under the terms of any ADCO.

#### **ISSUE 28 - FMF REMEDIATION**

KcC PC believe that to achieve this it is essential that the entire development should be fully surveyed, catalogued, recorded and independently audited prior to the commencement of any works being initiated. Moreover, this should be a specific obligation under the terms of any ADCO.

#### **ISSUE 29 - FMF REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards for highway changes, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

#### **c) Changes from Stage 3**

- 2.11.10 KcC PC note that changes to both proposed site are limited to increased 'land take' as a result of further but still incomplete design development.
- 2.11.11 KcC PC note EDF Energy referencing **Volume 1, Chapter 15 of the Stage 3** Main Consultation Document for further details. KcC PC notes the summarised changes, largely described as red line changes with allied increases and reductions in 'land take'.
- 2.11.12 KcC PC note EDF Energy referencing **Chapter 6** of the **Stage 4** documents, for further details of these changes

#### **2.12 Yoxford roundabout**

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

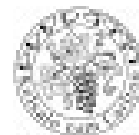
- 2.12.1 KcC PC note EDF Energy did bring forward a proposal for a new roundabout in Yoxford at **Stage 3**
- 2.12.2 KcC PC note that the roundabout is a required component irrespective of which option is pursued.
- 2.12.3 KcC PC note the purpose, location and size of the roundabout.

##### **b) Proposed development**

- 2.12.4 KcC PC note the description of the development described at **Figure 2.29**
- 2.12.5 KcC PC note the proposed realignment of the B1122
- 2.12.6 KcC PC note the designed widths of approach roads advised at 2.12.6.

##### **c) Changes from Stage 3**

- 2.12.7 KcC PC note the proposed relocation of the roundabout and amendments to the red line boundary to accommodate a Sandy Stilt Puffball fungus, one of only four fungi listed on Schedule 8 of the Wildlife & Countryside Act, it is also a Red Data Book species.
- 2.12.8 KcC PC note EDF Energy referencing **Chapter 6** of the **Stage 4** documents, for further details of these changes



### **ISSUE 30 - YOXFORD ROUNDABOUT DEVELOPMENT MANAGEMENT PLAN**

KcC PC are concerned that previous proposals, alongside those being brought forward at Stage 4 have the potential to cause significant disruption to a major artery up the Suffolk coast.

Consequently, KcC PC call on EDF Energy to provide a 'development management plan' that:

- i] ensures unhindered north and southbound access to/from A12 for all traffic types, for the duration of the development's construction
- ii] ensures unhindered east and westbound access to/from A1122 for all traffic types, for the duration of the development's construction
- iii] ensures unhindered east and westbound access to/from A1120 for all traffic types, for the duration of the development's construction
- iv] and provides an on-line public access service feeding live and forecast delays along the length of A12 from the A14 to Lowestoft, with projected clearance times.
- v] a publicly accessible 'on-line' service identifying and demonstrating the control measures being undertaken for each large indivisible load using the A12, Yoxford roundabout, B1122 and Sizewell link road

### **ISSUE 31 - YOXFORD ROUNDABOUT REPAIR AND RENEWAL**

KcC PC assume that EDF Energy and Suffolk County Council have agreed construction standards for highway changes, 'in construction phase' warranty, repair and renewal responsibilities, thereby safeguarding Suffolk Council Tax payers from costs arising from sub-standard construction methods, materials and workmanship?

## **2.13 Other highways development**

### **a) Introduction**

- 2.13.1 KcC PC note EDF Energy state their other proposed highway improvements mitigate traffic impacts arising from the construction of Sizewell C, although no baseline and quantification of any mitigation benefit have been provided.
- 2.13.2 KcC PC note the eight highway improvements that constitute EDF Energy's mitigation programme, specifically:
  - Junction at A140/B1078 west of Coddanham
  - Safety programme of works at B1078/B1079 junction at Easton and Otley College
  - A144 junction with A12 modification south east of Bramfield
  - B1119 junction with A12 modification west of Saxmundham
  - Safety programme of works at B1069 junction with A1094 south of Knodishall
  - North east component of the two villages bypass at Friday Street
  - B1122 Mill Street vertical alignment (not included under road-led or 'integrated' options
  - Wickham Market diversion route proposal



KcC PC note several are largely a component of the two villages bypass or relatively simple vegetation control, signing and/or associated minor works. Consequently, KcC PC believe 'mitigation' for increased traffic is probably overstating the depth of the programme of works.

2.13.3 KcC PC note that the Wickham Market diversion route is now being considered alongside the broader issue referred to under the Southern park and ride at **2.10 above**

2.13.4 KcC PC note EDF Energy's assertion that the 'other highways improvements' will collectively be required irrespective of which option is taken forward to the ADCO.

**b) Proposed development**

**i] A140/B1078 west of Coddenhams**

2.13.5 KcC PC note the location and description of the existing site described at **Figure 2.30**

2.13.6 KcC PC note the limited level of improvement being proposed by EDF Energy, **delivering unquantified benefits**.

**ii] A140/B1078 west of Coddenhams**

2.13.7 KcC PC note the location and description of the existing site described at **Figure 2.31**

2.13.8 KcC PC note the limited level of improvement being proposed by EDF Energy, **delivering unquantified benefits**

2.13.9 KcC PC note the proposed works at **Figure 2.31** have not changed since Stage 3

2.13.10 KcC PC note the works largely comprise; vegetation maintenance, signage and road markings.

**iii] A12/A144 south of Bramfield**

2.13.11 KcC PC note the location and description of the existing site described at **Figure 2.32**

2.13.12 KcC PC note the proposed improvement, but remain unconvinced in a location where a roundabout might have been more appropriate

2.13.13 KcC PC note the works include an 'extending queueing island' on the A12 as seen at Blythburgh to the north.

**iv] A12/B1119 west of Saxmundham**

2.13.14 KcC PC note the location and description of the existing site described at **Figure 2.33**

2.13.15 KcC PC note the limited level of improvement being proposed by EDF Energy, **delivering unquantified benefits**

2.13.16 KcC PC note the works largely comprise; vegetation maintenance, signage and road markings.

**v] A1094/B1069 south of Knodishall**

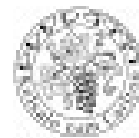
2.13.17 KcC PC note the location and description of the existing site described at **Figure 2.34**

2.13.18 KcC PC note the EDF Energy synopsis of the issue the junction presents

2.13.19 KcC PC note the limited level of improvement being proposed by EDF Energy, **delivering unquantified benefits**

2.13.20 KcC PC note the works largely comprise; vegetation maintenance, signage and road markings.

KcC PC also note EDF Energy's proposal to reduce the speed limit from 60mph to 40mph where more substantial works would seem appropriate.



**ISSUE 32 - A1094/B1069 JUNCTION SOUTH OF KNODISHALL**

It was not immediately clear to KcC PC exactly why this junction requires mitigation, unless EDF Energy anticipate this as a primary access route to the Main Construction Site, the LEEIE and/or the campus.

Assuming this to be the case, KcC PC believe that the remainder of the route(s) into these locations would need considerably more improvements than just this junction, passing as they do through Knodishall and relatively heavily populated residential areas of Leiston.

Moreover, it raises the question of improvements to the link from Friday Street, through Snape and past Friston, containing as it does; undulating, narrow stretches of road and the known Snape crossroads potential blackspot.

2.13.21 KcC PC note further information is provided at **Volume 1, Chapter 11 of the Stage 3 Main Consultation Document**.

**vi] Friday Street north east of Farnham**

2.13.22 KcC PC note the location and description of the existing site described at **Figure 2.35**

2.13.23 KcC PC note the required works and understand them to be integral to the two villages bypass. Consequently, they don't understand why they are being identified in the programme of other proposed highway improvements.

2.13.24 KcC PC note the paragraph but remain confused (**see 2.13.23 above**)

**ISSUE 33 - FRIDAY STREET JUNCTION DEVELOPMENT MANAGEMENT PLAN**

KcC PC are concerned that previous proposals, alongside those being brought forward at Stage 4 have the potential to cause significant disruption to a major artery up the Suffolk coast.

Consequently, KcC PC call on EDF Energy to provide a 'development management plan' that:

i] ensures unhindered north and southbound access to/from A12 for all traffic types, for the duration of the development's construction

ii] ensures unhindered east and westbound access to/from A1094 for all traffic types, for the duration of the development's construction

iii] ensures unhindered north and south access to/from the old A12 (Farnham) for all traffic types, for the duration of the development's construction

iv] and provides an on-line public access service feeding live and forecast delays along the length of A12 from the A14 to Lowestoft, with projected clearance times.

**vii] Mill Street B1122**

2.13.25 KcC PC note this work would only be delivered in conjunction with a Theberton bypass, under the rail-led option

2.13.26 KcC PC note the location and description of the existing site described at **Figure 2.36** and the proposed works within the narrative

2.13.27 KcC PC note the works are not required under any option other than the rail-led.

KcC PC understood that EDF Energy were planning on using the B1122 in the event of the Sizewell link road not being available and consequently would have thought the required works would be needed to cope with this eventuality.



**viii] Wickham Market diversion route**

2.13.28 KcC PC note this work previously formed part of the Southern park and ride at Stage 3 and was as shown at **Figure 2.37**

2.13.29 KcC PC note the details of this option were set out at **Volume 1, Chapter 17 of the Stage 3** Main Consultation Document.

**c) Changes from Stage 3**

2.13.30 KcC PC note EDF Energy have made changes to proposals since **Stage 3**. This follows detailed modelling.

**i] A140/B1078 west of Coddendam**

2.13.31 KcC PC note an increase in the red line boundary to allow for additional signage

**ii] A12/A144 south of Bramfield**

2.13.32 KcC PC note the amended proposal being forward at **Stage 4** but are minded that a roundabout would be far more robust and effective at dealing with the current problem exacerbated as it will be, by Sizewell C construction traffic.

**iii] A12/A1119 west of Saxmundham**

2.13.33 KcC PC note but don't understand the improvement being made with the proposed works, or the effectiveness and nature of the mitigation.

**iv] A1094/B1069 south of Knodishall**

2.13.34 KcC PC direct EDF Energy to comments made at **ISSUE 32 above**

2.13.35 KcC PC note the changes are explained at **Chapter 6 of the Stage 4** Consultation document.

**ISSUE 34 - LANES AND SINGLE TRACK ROAD SAFEGUARDING**

KcC PC are concerned that having reviewed The Project Overview section of the Stage 4 Consultation Document, EDF Energy have still not come forward with any substantive proposals to safeguard the network of narrow lanes and single track roads that interlink towns, villages and hamlets throughout Coastal Suffolk.

Indeed, KcC PC note some proposals being brought forward in association with the Sizewell link road show how little regard EDF Energy have for this network and safeguarding it from becoming a series of 'rat runs', openly abused by construction traffic up to and including 3.5 tonne LGVs.

The experience and ongoing problems of Kelsale cum Carlton exemplify why EDF Energy must take firm action from the outset to police their employees, contractors and suppliers and thereby avoid replicating this issues of one moderately sized business, on an industrial scale.

KcC PC look to EDF Energy to recognise their responsibilities to the locality, and come forward with proposals, policies and strategies to ensure Coastal Suffolk lanes are not sacrificed to irresponsible and inconsiderate parties undertaking working for or supplying them with materials and services.

**3. FREIGHT MANAGEMENT STRATEGY**

**3.1 Introduction**

3.1.1 KcC PC note the change from the **Stage 3 Consultation** where **Chapter 3** referred to "*Transport Strategy*", to **Stage 4** where EDF Energy (more appropriately) refer to their strategy at **Chapter 5** as "*Freight Management Strategy*", the only area of transport where EDF Energy really have shown an enduring interest.





KcC PC also note that even **at Stage 4**, EDF Energy have continued to remain silent in respect to providing a detailed and comprehensive analysis of traffic movements and impacts over the 12 year construction window.

#### **ISSUE 35 - LACK OF FREIGHT TRANSPORT DATA**

KcC PC once again call upon EDF Energy to come forward with their detailed transport forecasts for **all traffic movements throughout each phase of the construction programme**;

- by vehicle classification (e.g. Abnormal Indivisible Loads including Heavy Vehicles, HGV, Buses, Coaches, Mini-buses, LGV >1.5 tonnes, and LGV< 1.5 tonnes, Hazardous Loads, Cars, etc.)
- entry and exit point for vehicles into Suffolk (e.g. A12 northbound through Essex to Copdock, A14 eastbound from Cambridgeshire and beyond, A12 Southbound from Norfolk and beyond, etc.)
- by journey (e.g. A12 Northbound from J58 of A14, A12 Southbound from Lowestoft and later, LEEIE to main development site, other routes, etc.)
- by sub-phase, by time of day
- primary routing(s) into Freight Management Facility
- primary routing(s) out of Freight Management Facility
- planned alternative routings (by vehicle class) in the event of primary route(s) becoming impassable or unusable by some or all vehicle classes

#### **ISSUE 36 - ROAD REPAIR AND RENEWAL PLANNING & FUNDING**

KcC PC note EDF Energy have yet to bring forward an agreed position regarding **'planned road surface repair and renewal'** covering the duration of the Sizewell C construction phase. The Parish Council have assumed that EDF Energy would have included provision for **'planned road surface repair and renewal'** and devised The Project accordingly.

KcC PC have also assumed that Suffolk County Council have been heavily involved in this planning and that a suitably **large funding arrangement has been agreed between EDF Energy and SCC** in order to not further impact Coastal Suffolk residents and businesses with the cost of such a programme of works.

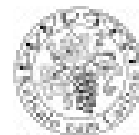
KcC PC regard this issue as particularly important, as the Parish Council has become aware of **the high degree of wear imparted on road surfaces used by HGV traffic under the phenomenon "Generalised Fourth Power Law"**.

KcC PC are concerned that if requisite measures are not incorporated in the plan for The Project, residents, businesses and visitors will become further impacted by impromptu and 'make do and mend' arrangements with Council Tax payers having to pay for the inconvenience.

#### **ISSUE 37 - LANE SAFEGUARDING INCLUDING REPAIR, RENEWAL AND FUNDING**

In the same vein, KcC PC are concerned that the use of an ill equipped network of single track roads and lanes (as previously described) running from settlements adjacent to the A12 (and other roads) will be severely and adversely impacted by uncontrolled and unpoliced 'rat running' by; workforce cars, small and large LGVs and smaller HGVs.

Continues on next page...



## ISSUE 37 CONTINUED

Not only will road surfaces potentially degrade with increased traffic movements, but ecological assets, habitats, verges, ditches, hedges, tree branches and roots may be seriously compromised, as evidenced by the recent events at Rendham Road in Kelsale cum Carlton.

**KcC PC call on EDF Energy to recognise the potential for uncontrolled and irrevocable damage to be heaped upon the Coastal Suffolk network of roads, lanes and tracks without immediate and emphatic actionable plans being developed and brought forward.**

3.1.2 KcC PC note EDF Energy's description of the 'the third way' being brought forward at **Stage 4** but regard the use of 'integrated' as somewhat illusory, insofar as it bears little resemblance to, for example 'an integrated and high quality public transport system'.

KcC PC note the inference of the paragraph combined with comments made elsewhere. Specifically, that EDF Energy prefer and support methods of materials delivery where they have control and thereby have increased confidence of delivery.

Whilst KcC PC can understand that this may be the ultimate ambition of EDF Energy, it does somewhat undermine the notion that EDF Energy wants to work closely with local communities, people and businesses to deliver Sizewell C in the most considerate way practicable.

3.1.3 KcC PC note the high degree of conflation at **paragraph 3.1.3** and the implied breadth and depth of activity undertaken by EDF Energy **since the Stage 3 consultation**. The Parish Council is also interested that EDF Energy use "*region*" in connection with getting "*...a greater understanding of the views about the freight management strategy across the region*". KcC PC would be interested in understanding the depth and breadth of views held by others regarding something that largely impacts Coastal Suffolk.

3.1.4 KcC PC note the contents of the chapter described by EDF Energy's digest.

3.1.5 KcC PC note with disappointment, that despite the extensive activity claimed by EDF Energy (described in **Para 3.1.3** above), there have been no changes to; the freight management assumptions, proposals for managing, monitoring and controlling HGVs, and proposals for managing worker transport since **Stage 3**.

3.1.6 KcC PC note that Traffic Modelling for the 'integrated' option has been included at **Chapter 4**

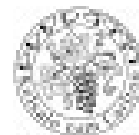
## **3.2 Stage 3: road-led and rail-led strategies**

3.2.1 KcC PC note the EDF Energy synopsis of the previous two proposals at **Stage 3**; rail-led and road-led

KcC PC note that within the road-led option, whilst reference is made to the FMF "*...regulating the timing and flow of vehicles to the Sizewell C main development site.*" KcC PC cannot find a complimentary commitment to having a facility '*...regulating the timing and flow of vehicles from the Sizewell C main development site.*'

KcC PC are concerned that controlling the reverse flow back down the A12 to the A14 is just as necessary as the initial delivery and are concerned that EDF Energy are deliberately avoiding a fundamental requirement expected of any considerate developer and/or contractor.

Moreover, KcC PC note that FMF is in place for HGV's approaching Sizewell down the A12 from the north and are interested to understand how convergence of the two HGV flows at the Yoxford B1122 and westerly end of the proposed Sizewell link road will be effectively managed and controlled into the Sizewell main development site, noting that the merging looks likely to happen on the Sizewell link road?



### **3.3 Stage 4: integrated strategy**

- 3.3.1 KcC PC note that EDF Energy think the 'integrated' option *"...combines many of the benefits of both the rail-led and road-led..."* and challenge EDF Energy to define the 'many benefits' to which they refer, particularly those benefitting Coastal Suffolk residents, businesses and visitors, rather than just those benefitting EDF Energy.

### **3.4 Comparison of the infrastructure and works under each strategy**

- 3.4.1 KcC PC note all three strategies would utilise a BLF and struggle to understand why the A12 Yoxford roundabout is also being equipped to cope with AIL freight.

KcC PC also note that at **Stage 4** an AIL is now defined to mean *"Abnormal INVISIBLE Loads"* at Abbreviations (Page 186).

If this change is a deliberate EDF Energy strategy to minimise the visual impact of the proposed Sizewell C development, KcC PC give it their total support!

- 3.4.2 KcC PC note the loss of upgrades to the East Suffolk line as a result of the potential failure of the rail-led option would also result in the loss of the most substantial, longest lasting, highest impact legacy yet held out by EDF Energy as a by-product of the Sizewell C proposal.
- 3.4.3 KcC PC note EDF Energy referring readers to **Section 3.6** for a further explanation of infrastructure needed for each option.

#### **Table 3.1**

KcC PC note that EDF Energy do not propose an FMF for the rail-led strategy, but do propose one for the 'integrated' option, leading KcC PC to ask where the cut-off comes given that:

Road-led requiring FMF – **375** up to 575 HGV deliveries per day

'Integrated' option requiring FMF – **325** up to 500 HGV deliveries per day

Rail-led not requiring FMF – 225 up to **350** HGV deliveries per day

### **3.5 Comparison of the operation of each strategy**

#### **a) Rail movements**

- 3.5.1 KcC PC note the original proposal was detailed at **Volume 1, Chapter 8, Section 8.4 of the Stage 3 Main Consultation Document**.

It also notes that at **Stage 3** issues had already been raised in respect to noise, were the proposed route used at night. KcC PC notes at; **Stage 3, Volume 1, Chapter 8, Figure 8.3** the 'stabling' of trains on the Leiston Branch Line was outlined, this is repeated at **Stage 4, Chapter 3, Figure 3.1**.

#### **ISSUE 38 - TRAIN STABLING ON THE SAXMUNDHAM TO LEISTON BRANCH LINE**

KcC PC wish it to be clear that they totally oppose the stabling of trains at the described locations on the Saxmundham to Leiston Branch Line (Stage 4, Chapter 3, Figure 3.1 refers).

In the event that approval is given, KcC PC (with parish residents across open fields at Clay Hills) could not support the proposal for the stabling of trains on the Saxmundham to Leiston branch line without extensive evidence being produced that the propagation of noise (under all weather conditions) from this activity can be limited to existing background levels, at all receptors. In addition, the Parish Council would require that locomotives were powered 'off' during stabling.

Moreover, the Parish Council would expect EDF Energy to bring forward a comprehensive set of management controls to ensure that all movement of trains to and from any 'stabling location' could only commence (i.e. locomotive



**ISSUE 38 CONTINUED**

start/stop sequences) between the hours of 8:30am and 5:30pm (Monday to Friday) and 11:00am to 4:30pm at weekends (were they to be permitted).

3.5.2 KcC PC note EDF Energy are not bringing forward a proposed schedule of operating hours for the Saxmundham to Leiston Branch line under the revised range of options being brought forward at **Stage 4**.

In the absence of clarity regarding proposed operational hours KcC PC are unable to support the proposals at **Stage 4**.

3.5.3 KcC PC note EDF Energy are not bringing forward a proposed schedule of operating hours for the Saxmundham to Leiston Branch line under the revised range of options being brought forward at **Stage 4**.

In the absence of clarity regarding proposed operational hours KcC PC are unable to support the proposals at **Stage 4**.

3.5.4 KcC PC note EDF Energy are not bringing forward a proposed schedule of operating hours for the Saxmundham to Leiston Branch line under the revised range of options being brought forward at **Stage 4**.

In the absence of clarity regarding proposed operational hours KcC PC are unable to support the proposals at **Stage 4**.

3.5.5 KcC PC note **Table 3.2** does not provide any clarity in respect to the hours of operation of the Saxumundham to Leiston Branch Line.

In the absence of clarity regarding proposed operational hours, KcC PC are unable to support the proposals at **Stage 4**.

**b) HGV Management**

3.5.6 KcC PC note that **Volume 1, Chapter 6 of the Stage 3 Main Consultation Document did not describe in any detail how** EDF Energy intended to monitor HGV deliveries nor manage any incidents on the road network. This laxity and inexactitude throughout the Pre-application Consultations is concerning in the extreme.

KcC PC note **Volume 1, Chapter 5** of the Stage 3 Main Consultation Document described in very loose terms how EDF Energy proposed to monitor **some** HGV deliveries and manage any incidents on the road network.

KcC PC note the inference at **3.5.6**, that EDF Energy would pursue extended HGV operating hours, were either the road-led or 'integrated' option successful as part of any ADCO.

KcC PC refute the contention that hours could be extended *"...as the Sizewell link road ...takes HGV's further from residential areas."* insofar as communities along the A12 would still be badly impacted by extended hours, not just those of Yoxford, Middleton and Theberton.

Indeed, as a village bisected by the A12, Kelsale cum Carlton have communities located adjacent to both the west and east of the A12 who would be detrimentally impacted by extended hours.

KcC PC also note that at **Stage 3** EDF Energy did not:

1. satisfactorily and clearly demonstrate how managing the return HGV journeys (away from the main development) would be monitored and controlled
2. give any confidence that there would be any effective control of the larger LGV deliveries to the main development site or indeed on their return journeys



3. describe any of their proposed routes and whether they would be pro-actively managed
4. give any certainty about the planned hours of operation they were using in developing their proposals
5. demonstrate that they intended to pro-actively manage any traffic or its behaviour below the HGV class. This despite being reminded at every opportunity of the vulnerability of; the locality, the AONB, the road network surrounding the A12 and the narrowness of many surrounding roads and lanes
6. provide confidence that despite being mentioned, EDF Energy had developed any comprehensive plans for the deployment of either ANPR or RFID technology across the whole range of vehicles (i.e. HGV, LGV >1.5 tonne, LGV < 1.5 tonnes, buses, mini-buses, cars, motorcycles, etc.) potentially being utilised in the course of the construction phases execution.
7. in respect to 'incident management', provide anything other than a superficial description of a range of approaches, all of which lacked certainty, clarity and detail. KcC PC note that despite assurances from EDF Energy **at Stage 3** that they anticipated putting in place several different approaches, little seems to have progressed by **Stage 4**.

3.5.7 KcC PC note the EDF Energy assertion that based on evidence from Hinkley Point C they are now confident that *"...construction of Sizewell C could reliably be delivered with fewer HGV's on the busiest day under all strategies."*

In the absence of any previous detail being available from EDF Energy in respect to the planned HGV profile throughout the construction phase, KcC PC are unable to judge the usefulness of this claim.

However, KcC PC have been made aware of some of the changes made to HGV movements in Somerset that must cast serious doubt on the authenticity and sustainability of the assertion.

**Table 3.2** at Page 65 is noted

### **3.6 Explanation of the differences in infrastructure and operations between the strategies**

3.6.1 KcC PC note but leave the claim that *"...EDF has been driven by the desire to maximise the use of the rail infrastructure..."* uncommented upon.

3.6.2 KcC PC note EDF Energy's comment.

3.6.3 KcC PC note EDF Energy's commentary on the constraints imposed by the East Suffolk line.

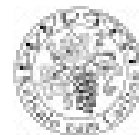
3.6.4 KcC PC note the key drivers EDF Energy have chosen to derive their freight management options.

KcC PC take issue with EDF Energy's assertion that *"...where the impact on communities of road transport on the existing road network would otherwise be unacceptable, new bypasses, highway improvements or constraints on the timing of HGV movements are proposed."*

It is the contention of KcC PC that there is little evidence that the proposed works and highway improvements do little more than that absolutely necessary to; address the only the very worst problems of the A12, i.e. relocate the a proportion of the issues impacting the B1122, assist Wickham Market realise the initial steps of their Neighbourhood Plan and then do a small programme of 'house cleaning' activity at junctions further afield.

#### **a) Rail constraints and opportunities**

3.6.5 KcC PC note the vagueness of *"...with trains travelling overnight along the East Suffolk line to holding points on the Saxmundham to Leiston branch line to the west of Leiston before travelling through Leiston to the LEEIE in the mornings."*



**ISSUE 39 - Train Stabling (see also ISSUE 10)**

KcC PC wish it to be clear that they totally oppose the stabling of trains at the described locations on the Saxmundham to Leiston Branch Line (Stage 4, Chapter 3, Figure 3.1 refers).

In the event that approval is given, KcC PC (with parish residents across open fields at Clay Hills) could not support the proposal for the stabling of trains on the Saxmundham to Leiston branch line without extensive evidence being produced that the propagation of noise (under all weather conditions) from this activity can be limited to existing background levels, at all receptors. In addition, the Parish Council would require that locomotives were powered 'off' during stabling.

Moreover, the Parish Council would expect EDF Energy to bring forward a comprehensive set of management controls to ensure that all movement of trains to and from any 'stabling location' could only commence (i.e. locomotive start/stop sequences) between the hours of 8:30am and 5:30pm (Monday to Friday) and 11:00am to 4:30pm at weekends (were they permitted).

3.6.6 KcC PC note and acknowledge the advice received from Network Rail in respect to upgrade requirements to the East Suffolk line required to permit freight trains working in combination with passenger services.

KcC PC note that were EDF Energy to carry out these works, they would likely become a significant beneficial legacy for the Coastal Suffolk community.

3.6.7 KcC PC note that five movements under the 'integrated' option would operate overnight. The lack of detail means KcC PC are unable to ascertain the logistics or timing of those movement. **Consequently, KcC PC's position is that stated at ISSUE 38 above and previously at ISSUE 10.**

3.6.8 KcC PC note that five movements under the 'integrated' option would operate overnight. The lack of detail means KcC PC are unable to ascertain the logistics or timing of those movement. **Consequently, KcC PC's position is that stated at ISSUE 38 above and previously.**

3.6.9 KcC PC note the paragraph.

**b) Theberton bypass or Sizewell link road**

3.6.10 KcC PC note the content of the paragraph but question the efficacy of assuming (at lines 4 & 5) that HGV vehicles alone would transport the all freight not capable of being accommodated by rail or the BLF. This would potentially return an underestimate of movements.

3.6.11 KcC PC note the content of the paragraph

3.6.12 KcC PC note the content of the paragraph

**c) Timing and quantity of HGVs**

3.6.13 KcC PC note the content of the paragraph but once again **highlight the paucity of information provided**, relating as it does to limited periods within the 12 year construction phase.

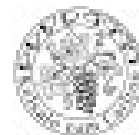
KcC PC are compelled to **ask again that EDF Energy provide a full breakdown of the planning assumptions** being used by The Project and provide **a daily profile of materials delivery by HGV.**

3.6.14 KcC PC note the content of the paragraph

3.6.15 KcC PC note the content of the paragraph but are concerned that EDF Energy are **only reflecting the potential impact on B1122 communities, whereas the impacts are more widespread, including communities on or adjoining the A12.**

**Consequently, KcC PC are totally opposed to the extension of hours.**





**d) Freight management facility**

- 3.6.16 KcC PC note that at the **Stage 4** consultation, EDF Energy are proposing the FMF to manage the additional HGV traffic along the **A14**(sic)...surely the A12?

KcC PC note that EDF Energy do not propose an FMF for the rail-led strategy, but do propose one for the 'integrated' option, leading KcC PC to ask where the cut-off comes given that:

Road-led requiring FMF – **375** up to 575 HGV deliveries per day

'Integrated' option requiring FMF – **325** up to 500 HGV deliveries per day

Rail-led not requiring FMF – 225 up to **350** HGV deliveries per day

KcC PC note the assertion that *"The lower number of HGV's...could be effectively be managed using...DMS."*, but believe the margins being finessed are effectively 'wafer thin' and act to increase (unnecessarily) the risk to A12 safety and operation.

**3.7 Why are we considering an integrated strategy?**

- 3.7.1 KcC PC note the content of the paragraph and conclude it evidences EFF Energy have a detailed plan of the required materials delivery operation to service the construction phase.

Raising the question, as to why EDF Energy have wilfully limited the level of hard data being made available at each of the consultations?

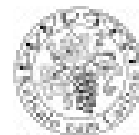
KcC PC conclude that EDF Energy are concerned that full disclosure would shock Suffolk County Council, East Suffolk District Council, Coastal Suffolk businesses and residents, along with all the other stakeholders.

**ISSUE 40 - ABSENCE OF GOOD QUALITY DATA THAT ENABLE UNDERSTANDING OF SCALE AND IMPACT**

Assuming the Stage 3 estimate of **10,700,000 tonnes** of materials being required to construct Sizewell C, and assuming the **average maximum load of an HGV would be circa 29 tonnes**, it is easy to see why this might be a concern.

A total road delivered materials operation, based on the above figures would give rise to circa **370,000 HGV deliveries**, or **740,000 individual movements** over the 12 years, equating to at least **15,000,000 predominantly diesel powered miles on Coastal Suffolk roads**.

- 3.7.2 KcC PC note that the Government's overarching NPS for energy states rail transport is preferred where cost effective. Begging the question as to **"...who will pay for the repair and renewal bill of the A12 during the 12 year construction phase?"** especially as evidence obtained under the **"Generalised Fourth Power Law"** indicates HGV road surface attrition **can be up to 136,000 times more than a typical car** (i.e. a Ford Focus)?
- 3.7.3 KcC PC note EDF Energy's interpretation of the joint East Suffolk and Suffolk County Council response at **Stage 3** as it relates to the options proposed by EDF Energy at the time.
- 3.7.4 KcC PC note EDF Energy's interpretation of feedback from the **Stage 3** consultation, noting no evidence nor analysis has been provided in support of their assertions.
- 3.7.5 KcC PC note that EDF Energy are developing their thinking based on their experiences at Hinkley Point C (understood to be approaching the end of the third year of construction).
- KcC PC also note that EDF Energy are concerned at the higher level of risk if dependence on the East Suffolk line's infrastructure was needed.
- 3.7.6 KcC PC note **the homily to 'certainty'** provided at 3.7.6
- 3.7.7 KcC PC note elements of Network Rail's response to **Stage 3** disclosed by EDF Energy at 3.7.7



- 3.7.8 KcC PC note Network Rail's inability to commit to an undertaking to complete a programme of necessary works on the East Suffolk line in time to integrate(sic) with EDF Energy's plan for The Project.
- 3.7.9 KcC PC note that as a result of 3.7.5 to 3.7.8, EDF Energy and Network Rail have agreed to jointly explore options to increase the productivity of the East Suffolk line in the delivery of materials to Sizewell C.
- 3.7.10 KcC PC note that Network Rail have recently concluded that there is now a gap in the passenger timetable allowing an additional train path during the day. The path was historically used by Sizewell A to transport nuclear fuel to and from the site.
- 3.7.11 KcC PC note the path would permit one freight train movement during the day.
- KcC PC also note that EDF Energy are exploring with Network Rail whether EDF Energy could carry out all the works on the Saxmundham to Leiston Branch line.
- 3.7.12 KcC PC note the assertion of EDF Energy that in combination, these developments may mean the 'integrated' option offers the optimum freight delivery strategy for The Project.

### **3.8 Environmental impacts of an integrated strategy**

- 3.8.1 KcC PC note that EDF Energy refer to the **incomplete, inaccurate and inadequate PEI at Volumes 1 & 2 of the Stage 3 Main Consultation Documents**.

Recognising that the 'integrated' option is composed of components from the previous options, EDF Energy advise that this section describes the "...potential..." environmental impacts in comparison with the previous options.

#### **a) Preliminary environmental information for the integrated strategy**

**Table 3.3** at Page 69 is noted

KcC PC draw EDF Energy's attention to Kelsale cum Carlton residents in properties over open fields on Clay Hills, near the 'westerly' stabling position.

KcC PC expect these properties to be treated as receptors for the purposes of both the PEI, EIA and ES.

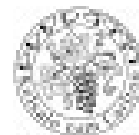
#### **ISSUE 41 - Train Stabling (see also ISSUES 10 and 39 above)**

KcC PC wish it to be clear that they totally oppose the stabling of trains at the described locations on the Saxmundham to Leiston Branch Line (Stage 4, Chapter 3, Figure 3.1 refers).

In the event that approval is given, KcC PC (with parish residents across open fields at Clay Hills) could not support the proposal for the stabling of trains on the Saxmundham to Leiston branch line without extensive evidence being produced that the propagation of noise (under all weather conditions) from this activity can be limited to existing background levels, at all receptors. In addition, the Parish Council confirm they would require that locomotives were powered 'off' during stabling.

Moreover, the Parish Council would expect EDF Energy to bring forward a comprehensive set of management controls to ensure that all movement of trains to and from any 'stabling location' could only commence (i.e. locomotive start/stop sequences) between the hours of 8:30am and 5:30pm (Monday to Friday) and 11:00am to 4:30pm on weekends (were they permitted).

KcC PC note under the **Main Development Site** section that *"...additional significant noise effects may occur due to night-time train movements on the green rail route."* and are concerned that the PEI does not appear to explicitly consider the impact of late night trains on rural properties adjacent to and close by (albeit across open fields) to the Saxmundham to Leiston Branch line. **Noting RR8 is the sole and furthest west receptor identified.**



**ISSUE 42 - NOISE PROPOGATION ON THE SAXMUNDHAM TO LEISTON BRANCH LINE (NIGHT TRAINS)**

As there is little barrier to noise travel across the open fields along much of the branch line, and the branch line climbs quite steeply, KcC PC expect the PEI to demonstrate the sound propagation patterns along the length of the branch line and bring forward noise mitigation plans for agreement with the Parish Council and individual receptors within the identified potential propagation impacted areas.

Although noted in the **Saxmundham to Leiston branch line** section of **Table 3.3** and **Volume 2A Chapter 4 of the Stage 4 PEI**, KcC PC assume that the 'upgrade' works will be extensive and along the totality of the branch line, to bring the Saxmundham to Leiston branch line up to the standard that EDF Energy imply in the foregoing paragraphs of this Chapter. Consequently, KcC PC assume there will be extensive noise, dust and vibratory impacts in the areas immediately adjacent to the branch line and within surveyed propagation areas, yet to be specifically identified by EDF Energy.

**ISSUE 43 - NOISE PROPOGATION ON THE SAXMUNDHAM TO LEISTON BRANCH LINE (TRACK RENEWAL)**

Therefore, KcC PC require EDF Energy to thoroughly survey the entire length of the Saxmundham to Leiston branch line and bring forward propagation impacts and mitigations for agreement with the Parish Council and the potentially impacted individual receptors, prior to any work being initiated.

KcC PC also note that at **Volume 2A, Chapter 4 Para 4.3.7 of the PEI at Stage 3**, EDF Energy propose that *"For the branch line repair and replacement: noisy activities to take place on during Monday to Friday 7:00 to 19:00 hours and Saturday 07:00 to 13:00 hours."*

**ISSUE 44 - WORKING HOURS ON THE SAXMUNDHAM TO LEISTON BRANCH LINE**

KcC PC note the temporal limits proposed only relate to "...noisy activities..." implying that EDF Energy intend to use a wider temporal window to repair and replace the branch line. KcC PC are fervently opposed to both the proposed temporal limits and the inferred extended hours.

Consequently, were EDF Energy to obtain a DCO including repair and renewal of the Saxmundham to Leiston branch line, KcC PC would seek a strictly managed temporal window for all works (noisy or otherwise) of no more than 8:30am to 5:30pm Monday to Friday (and if weekend working was permitted under the DCO, that it be restricted to 11:00am to 4:00pm).

3.8.2 KcC PC note the utilisation of previously proposed elements (from other options) being deployed in variant configuration to comprise a new proposal known as the 'integrated' option.

KcC PC note that the previously circulated **PEI at Stage 3** is being used as the basis for the PEI for the 'integrated' option, despite at **Stage 3 it being widely regarded and remarked on as being; inadequate, incomplete and in places incorrect.**

**b) Environmental effects of the integrated strategy compared against the road-led and rail-led strategies**

3.8.3 KcC PC note that EDF Energy only make positive observations regarding the disputed improvement in noise pollution levels in the communities of Middleton Moor and Theberton, but omit any detrimental impacts occurring to properties in the Kelsale cum Carlton communities at the A12 and North Green.

3.8.4 KcC PC note the assertions made by EDF Energy regarding road traffic and associated noise impacts on the A12 declining under the 'integrated' option, when comparing them to the road-led strategy.



In the absence of any substantial justification for this assertion, KcC PC presume that this alleged beneficial improvement is solely as a result of reducing the number of HGV movements.

Similarly, KcC PC assume the increased road traffic and associated noise, when compared to the rail-led option is due to the higher HGV movements.

However, KcC PC understand that under some circumstances, traffic and associated noise can also achieve increased levels dependent on both the density and the components of the traffic flow. It is also understood that the 'multiplier effect' can be further increased if accumulations of moderately fast HGV traffic become convoys.

- 3.8.5 KcC PC note the assertions made regarding the traffic noise impacts on the wider road network but in the absence of compelling evidence reserve their position, pending the results of EDF Energy's additional modelling and analysis and them bringing forward proposals for mitigating detrimental impacts.
- 3.8.6 KcC PC note the EDF Energy comments regarding the significant noise impacts arising from the development and use of the green rail route under the 'integrated' option and draw their attention to comments made in the preceding issues and paragraphs and again at **3.8.1 and Table 3.3** above.
- 3.8.7 KcC PC note the EDF Energy comments regarding the significant noise impacts arising from the development and use of the green rail route under the 'integrated' option and draw their attention to comments made in the preceding issues and paragraphs and again at **3.8.1 and Table 3.3** above.
- 3.8.8 KcC PC note the wider impacts on communities adjoining and adjacent to the East Suffolk line below Saxmundham Junction and the potential noise insulation undertaking by EDF Energy.

### **3.9 Which freight management strategy?**

- 3.9.1 KcC PC note the positive light that EDF Energy place on the eleventh hour 'integrated' option saying the *"We consider that the integrated strategy could be suitable for freight delivery for the Project."* EDF Energy.

#### **ISSUE 45 - PROPOSED ROAD TRAFFIC BURDEN REMAINS TOO HIGH**

Whilst KcC PC concede that the 'integrated' option holds out the promise of a reduction in the intolerable traffic load (on the A12) described under the road-led proposal, it is still very concerned that the beneficial reduction falls far short of that achievable under the rail-led option, which notably was also widely regarded as too high at the **Stage 3** consultation.

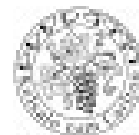
Consequently, KcC PC are unable to support any of the options currently being proposed by EDF Energy.

Whilst the requirement for sustainable and low carbon energy production is understood, the continuing and disproportionate reliance on heavily polluting road based transport to achieve the construction of Sizewell C, is considered too high a price to be paid by the; environment, the AONB, businesses, residents and too damaging to the existing infrastructure and natural resources (i.e. water) on which farming, tourism and residents rely.

- 3.9.2 KcC PC note the EDF Energy suggestion to respondents that; *"In assessing the three options, it is important to have regard to the physical infrastructure and level of HGV movements proposed for each option as set out in Figure 3.2."*

#### **ISSUE 46 - HGV MOVEMENTS AND AVAILABLE DATA**

This recommendation seems somewhat ironic, in so far as the level of available detail in respect to HGV (and other construction traffic) movements provided by EDF Energy throughout the Pre-Application Consultation process has been **absurdly thin and remains so at Stage 4.**



In respect to the physical infrastructure, KcC PC note that EDF Energy make much of the inadequacies of the East Suffolk line and the Saxmundham to Leiston branch line, but remain largely silent in regard to the underpinning infrastructure of the road network they intend to rigorously 'stress test' over a twelve year construction phase.

KcC PC consider this silence more surprising as it is becoming evident that EDF Energy are intent on pursuing a disproportionately high 'road dependent' delivery strategy under all of their proposed options.

#### **ISSUE 47 - HGV IMPACTS ON ROAD SURFACES AND THE UNDERPINNING ROAD BED**

As identified previously, KcC PC are very concerned that the increased attrition of the road surface and underpinning bed brought about by the intensification of HGV traffic over a protracted period, will give rise to a significant increase in the repair and renewal requirements.

KcC PC see this not only as a threat to the Sizewell construction programme, but also a major and injurious impact on Coastal Suffolk; residents, businesses and tourism.

Moreover, it believes (in the absence of EDF Energy providing any evidence to the contrary) that EDF Energy are relying on Suffolk County Council to maintain the road infrastructure in the face of a protracted onslaught of HGV, LGV, bus, car and motorcycle traffic, the like of which has never been seen on Suffolk roads before.

The corollary being that, Suffolk Council and Business tax payers will be expected to 'pick up the bill' for EDF Energy's experiment with public highways!

3.9.3 KcC PC note the 'integrated' option involves elements (some modified) of the previously proposed road-led and rail-led options promoted by EDF Energy.

KcC PC note **Table 3.4** contains an EDF Energy view of *"Key advantages and disadvantages of the integrated strategy."*

**Table 3.4** at Page 73 is noted

KcC PC note that EDF Energy portray their greater control under the 'integrated' option as a positive advantage that would provide *"...greater certainty of the Project programme being met and the necessary mitigation being in place...than under the rail-led strategy."*

KcC PC note that another positive advantage is said to be *"Lower HGV impacts on the A12 and local road network than the road-led..."*

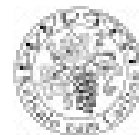
#### **ISSUE 48 – HGV USE OF THE LOCAL ROAD NETWORK**

KcC PC are concerned that EDF Energy refer of HGV '**impacts on the local road network**' when as far as KcC PC can recall there have been no notifications or proposals of HGV traffic on 'local' roads other than the A14, A12, B1122, Lovers Lane Leiston and should it receive consent, the Sizewell link road.

EDF Energy should bring forward a comprehensive digest of their proposals to route HGV traffic via the local road network, prior to making any ADCO.

**Table 3.5** at Page 74 is noted

Objectively, KcC PC cannot regard **Table 3.5** as anything other than an incomplete 'stacked deck', written as it is from EDF Energy's viewpoint. Moreover, the use of some of the parameters in this table verge on a modern day emulation of the politician's syllogism.



### **3.10 Next Steps**

- 3.10.1 KcC PC note that EDF Energy are to continue discussions with SCC regarding any updates to the traffic modelling and Network Rail to develop their proposals.

It is unclear what specific outcomes EDF Energy are seeking from these discussions, but **this reflects the opacity of the process during the entire Pre-Application Consultation** and contrasts sharply with the experience of individuals who have widely consulted and responded to consultations in other areas (e.g. Public Policy, Regulation and the framing of Legislation).

- 3.10.2 KcC PC note the assistance given and continuing to be given by Network Rail to assist EDF Energy in developing their required infrastructure proposals.

KcC PC also note the reference to the GRIP process, which EDF Energy appear to be following. KcC PC note that EDF Energy are intending to undertake **GRIP 3** during 2019, focusing on option selection and then option development and design.

KcC PC note the absence of detail relating to the ownership (short, medium and long term) of the Saxmundham to Leiston branch line estate and assets in the event of:

- a] A DCO being given and including the revised red line boundary
- b] EDF Energy undertaking all responsibility for the renewal and replacement of the branch line

And wonder what implications there are (short, medium and long term) in respect to (amongst other things):

- c] Compliance with and the application of Railway Law, Health and Safety and Engineering Standards
- d] Health, safety, policing and security
- e] The managing monitoring and maintenance of Engineering Standards
- f] The demarcation of roles, responsibilities and accountabilities
- g] Should EDF Energy seek to become a 'service operator' on the line for freight and/or passenger services or a mixed freight and passenger service
- h] What legal, regulatory and tax arrangements will apply

- 3.10.3 KcC PC note that EDF Energy state ; *"All necessary measures to control and mitigate the impact of rail and HGV movements will be taken into account in the assessment of the environmental impacts..."*

#### **ISSUE 49 - SCOPE OF ENVIRONMENTAL IMPACT AND MITIGATION ASSESSMENTS**

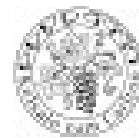
KcC PC are concerned that 3.10.3 (above) infers that only impacts arising from Rail and HGV movements will be considered in the assessment of the environmental impacts presented as part of the ADCO.

For the avoidance of doubt KcC PC believe that the EDF Energy must include all; Rail, HGV (all categories), LGV (all categories), bus, mini-bus, car, motorcycles and other powered conveyances (gross) movements in their assessment of impacts and mitigations.

In addition, KcC PC believe the gross hours of operation of all heavy vehicles, 'carbon derived fuel' powered construction equipment, air conditioning plant, etc. should also be assessed and included.

- 3.10.4 KcC PC note that EDF Energy state ; *"All necessary measures to control and mitigate the impact of rail and HGV movements will be taken into account in the assessment of the environmental impacts...and EDF Energy would commit to relevant measures as part of any consent granted by the Secretary of State"*





## **ISSUE 50 - SCOPE OF ENVIRONMENTAL IMPACT AND MITIGATION ASSESSMENTS**

KcC PC are concerned that 3.10.3 (above) infers that only impacts arising from Rail and HGV movements will be considered in the assessment of the environmental impacts presented as part of the ADCO.

For the avoidance of doubt KcC PC believe that the EDF Energy impact assessment must include; Rail, HGV (all categories), LGV (all categories), bus, mini-bus, car, motorcycles and all other powered conveyances (gross) movements in their assessment of impact and mitigation.

In addition, KcC PC believe the gross hours of operation of all heavy vehicles, 'carbon derived fuel' powered construction equipment, air conditioning plant, etc. should also be assessed and included.

## **4. TRAFFIC MODELLING**

### **4.1 Introduction**

#### **4.1.1 KcC PC draw EDF Energy's attention to Transport Analysis Guidance – Holiday Centres**

**KcC PC draw EDF Energy's attention to an enclosure in its Stage 3 response**, where in answer to a question from a Kelsale cum Carlton resident, the Department for Transport advised that although *"...TAG Unit M1.2 paragraph 3.3.6 does indeed state that "Surveys should be carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms and other abnormal traffic periods." This is in the context that, usually transport models are based on a typical working day so that the benefits estimated can be expanded to cover a full day and then a full year (TAG Unit A1.3). For the majority of transport schemes, it may be considered disproportionate to analyse a large number of model runs to reflect seasonal variation in each of the certainty assumptions tested, a transport modelling is very resource-intensive and time consuming.*

*However, it is possible that the business case for a scheme could depend heavily on seasonal impacts, and in this instance it would be good practice for analysts to seek agreement with assessors about the appropriate analytical approach at an early stage, typically though an Appraisal Specification Report ASR) in line with the TAG SRO Unit Section 1.2."*

## **ISSUE 51 - DEPARTMENT OF TRANSPORT CLARIFICATION REGARDING TAG AND HOLIDAY CENTRES**

KcC PC are concerned that despite this clarification on the TAG, received direct from the Department of Transport, EDF persist in conducting their traffic analysis without recognising that the Coastal Suffolk area (through which the construction traffic passes) is a recognised holidaying and tourist centre.

Consequently, KcC PC believe that **the methodology adopted for traffic analysis by EDF Energy is flawed** and invalid for the portrayal of traffic impacts brought about by the introduction of Sizewell C construction materials traffic and that generated by its workforce in attending Sizewell C (and others sites) to execute that construction.

4.1.2 KcC PC refer EDF Energy to **ISSUE 51** (above)

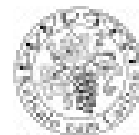
4.1.3 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.1.4 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.1.5 KcC PC refer EDF Energy to **ISSUE 51** (above)

### **4.2 'Without Sizewell C' traffic modelling**

4.2.1 KcC PC refer EDF Energy to **ISSUE 51** (above)



4.2.2 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.2.3 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.2.4 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.2.5 KcC PC refer EDF Energy to **ISSUE 51** (above)

#### **4.3 Traffic modelling of the Sizewell C peak construction phase**

4.3.1 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.3.2 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.3.3 KcC PC refer EDF Energy to **ISSUE 51** (above)

**Table 4.1** at page 80 noted

#### **ISSUE 52 - HGV OPERATIONAL HOURS**

KcC PC note a conflict between **Figure 3.2 at Page 72** where the Rail-led option is stated to have HGV operations between **07:00 and 23:00**. In contrast **Table 4.1 states 07:00 to 20:00**.

KcC PC are once again compelled to point out the confusion (at best) or malign ambiguity in EDF Energy's own figures, in their own document.

KcC PC continue to be unclear why no FMF exists on the northern approach via the A12. KcC PC would anticipate that the same need existed on this route, if for no other purpose than offering a lay-up area for HGV (and larger LGV traffic), in the event of an 'incident' or if the A12, B1122 or Sizewell link are closed (assuming of course that it receives a DCO).

4.3.4 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.3.5 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.3.6 KcC PC refer EDF Energy to **ISSUE 51** (above)

#### **4.4 Peak construction traffic effects across the modelled area**

4.4.1 KcC PC note the inference at 4.4.1 that all traffic apart from HGV and buses reflecting *"...likely real life behaviour...can re-re-route to choose the best available routes, taking account of distance and journey time..."*

#### **ISSUE 53 - THE EDF ENERGY RE-ROUTING STRATEGY FOR THE CONSTRUCTION PHASE?**

KcC PC are concerned that this statement (at **4.4.1 above**), buried in the Traffic Analysis Chapter portrays the actuality of what EDF Energy are planning for the Coastal Suffolk area – a 'free for all', with all but HGV and bus traffic being given a 'licence to roam' the roads, lanes and tracks of the local road network, to self-route in order to overcome issues on the A12, B1122 and the Sizewell link road (if it receives development consent).

If this is the reality in store, KcC PC predict large areas of Coastal Suffolk will be laid waste, before the end of the "early years".

KcC PC urgently seek clarification from EDF Energy on the detailed policies, monitoring, measures and controls that they will be putting in place to avoid a 'free for all' on the road network across Coastal Suffolk.

4.4.2 KcC PC refer EDF Energy to **ISSUE 51** (above)



4.4.3 KcC PC refer EDF Energy to **ISSUE 51** (above)

**4.5 Forecast daily 24 hour weekday traffic flows**

4.5.1 KcC PC refer EDF Energy to **ISSUE 51** (above)

**a) Traffic impacts of the integrated strategy**

4.5.2 KcC PC refer EDF Energy to **ISSUE 51** (above)

KcC PC also note that by opening new routes, EDF Energy's Traffic Analysis team have been able to identify that traffic flows decline on the old routes...amazing.

4.5.3 KcC PC refer EDF Energy to **ISSUE 51** (above)

4.5.4 KcC PC refer EDF Energy to **ISSUE 51** (above)

KcC PC note the comment vis a vis *"...no locations...traffic volume generated by The Project causes...capacity to be exceeded."*, also noting that the A14/A12 J58 roundabout is seemingly excluded from the analysis.

4.5.5 KcC PC refer EDF Energy to **ISSUE 51** (above)

KcC PC note the comment vis a vis *"...some locations may experience re-routing to traffic away from or onto alternative roads as a result of congestion..."*.

**ISSUE 54 – REDIRECTING THE CONSEQUENCES OF SIZEWELL C TRAFFIC**

KcC PC are very concerned that comments at 4.5.4 and 4.5.5 (and elsewhere throughout Stage 3 and Stage 4 consultations) demonstrate an approach to traffic analysis that verges on being myopic to the consequences implied in the answers it delivers.

KcC PC believe that the underpinning attitude of EDF Energy is to redirect as many consequences of their actions onto local authorities, other energy projects in the Coastal Suffolk area and simultaneously execute a strict cost avoidance programme, designed to attract new investment, optimise the profits on Sizewell C and mitigate issues elsewhere.

4.5.6 KcC PC refer EDF Energy to **ISSUES 51, 53 & 54** (above)

KcC PC note the timely inclusion of *"...This [re-re-routing] occurs most notably on the A12 at Woodbridge (location AA) where road capacity is already exceeded..."* exemplifying the point made by KcC PC at **ISSUE 54**.

**b) Comparison with rail-led and road-led strategies**

4.5.7 KcC PC refer EDF Energy to **ISSUES 51, 53 & 54** (above)

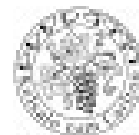
4.5.8 KcC PC refer EDF Energy to **ISSUES 51, 53 & 54** (above)

KcC PC note the exactitude of the EDF Energy Traffic Analysis in being able to finesse the narrative in this paragraph, based on rounding to the nearest 50 vehicles.

4.5.9 KcC PC refer EDF Energy to **ISSUES 51, 53 & 54** (above)

KcC PC note EDF make light of a re-routing volume of 5%, advising that *"...re-routed traffic volume is less than 5% and would not be noticeable when spread over a whole day."* what it fails to mention is that re-routing is unlikely to be spread over a whole day, instead **it is likely to cluster around peak hours and other periods of congestion**.

KcC PC also note EDF Energy refer the reader to **Section 6.4, Volume 1, Chapter 6 of Stage 3** for a *"Further description of the circumstances and impacts of re-routing..."*.



It seems after looking at the “*...further description...*” that **4.4.1 at Stage 4** largely restates **6.4.1 at Stage 3** with a few minor textural changes. Likewise, **4.4.2 at Stage 4** similarly largely restates **6.4.2 at Stage 3**.

KcC PC is of course very grateful to EDF Energy for putting so much effort into the “*...further description...*”.

KcC PC believes this type of slipshod tactic when undertaking a public consultation is nothing less than disgraceful and demonstrates the contempt that EDF Energy have for not just consultees, but potentially the whole public consultation process.

#### **4.6 Peak hour percentage increases in weekday traffic**

##### **4.6.1 KcC PC refer EDF Energy to ISSUE 51 (above)**

KcC PC note **Table 4.2** and **Table 4.3**

##### **a) Traffic impacts of the integrated strategy**

##### **4.6.2 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

KcC PC note EDF Energy's narrative but maintain it is still a significant increase in traffic on an inappropriate route (mainly the A12) and knowingly increases the damage sustained by; the environment, flora & fauna, resident health & wellbeing, businesses and visitors to the area.

##### **b) Comparison with rail-led and road-led strategies**

##### **4.6.3 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

KcC PC note that unsurprisingly “*The pattern of changes in the integrated strategy is noticeably different to those shown by the rail-led and road-led strategies.*”

#### **4.7 Changes in HGV and bus flows (typical and busiest day) at ten locations identified at Figure 4.6**

##### **4.7.1 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

KcC PC note **Table 4.4** and **Table 4.5**

KcC PC note that changes since to the rail-led and road-led strategies at Stage 3 make comparison impossible.

##### **a) Traffic impacts of the integrated strategy**

##### **4.7.2 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

##### **4.7.3 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

KcC PC note that “*...HGVs serving the Sizewell C construction site would be restricted to using the A12 and the Sizewell Link under the integrated strategy. Near the site, the only other road carrying Sizewell HGVs is Lovers Lane...*”.

KcC PC note that restrictions on LGV (up to 3.5 tonnes) routing are not mentioned. EDF Energy must provide details of the planned and managed routing of LGVs during the construction period.

KcC PC note the ambiguity introduced by “*Near the site, the only other road carrying Sizewell HGVs is Lovers Lane...*” and ask EDF Energy to clearly state “**that no other roads will be used by EDF Energy's Sizewell C HGV & LGV construction traffic, except Lovers Lane.**”

##### **4.7.4 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

##### **4.7.5 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**

##### **4.7.6 KcC PC refer EDF Energy to ISSUES 51, 53 & 54 (above)**



KcC PC note at **lines 5 & 6** EDF Energy state *"The B1122/Mill Street improvement would be in place by the very early stages of construction."* However, at **2.13.27** EDF Energy states *"The improvements would not be required under the road-led or integrated strategies..."*

#### **ISSUE 55 – INEXACTITUDE AND AMBIGUITY**

KcC PC are once again obliged to raise the continuing issues of inexactitude and ambiguity, as exemplified above.

It does little to reassure KcC PC that EDF Energy possess all the necessary corporate attributes to design, construct and run a nuclear facility, when they seemingly struggle to be consistent in portraying a clear and cohesive picture of how they intend to go about it.

#### **4.7.7 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)**

KcC PC are not satisfied that the increases in HGV/bus traffic over the A12 during the construction period are being dismissed by EDF Energy as *"...unlikely to exceed the road capacity in...these locations, except potentially at Woodbridge..."*, whilst virtually every week, if not every day somewhere in Coastal Suffolk residents are being confronted by some form of delay or incident that impacts their lives.

Their experience is real life, not some fanciful abstraction derived from algorithms and rules based logic.

What is increasingly and painfully clear is that, if Development Consent is given for Sizewell C, the only solace many will have as they suffer 12 years of disruption to their lives, is being able to say "I told you so".

#### **b) Comparison with rail-led and road-led strategies**

#### **4.7.8 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)**

KcC PC would have been confounded if EDF Energy had brought forward an 'integrated' option that didn't reduce the traffic volumes compared with the road-led option and mystified if they had been able to further reduce traffic volumes when comparing the 'integrated' option against the rail-led option. So, nothing new so far!

However, KcC PC continue to be surprised that EDF Energy intend to carry HGV/bus traffic through the westerly end of the B1122 and onto the Sizewell link road via a T junction. It remains to be seen just how easily the Northern flow (15% of the total HGV traffic plus buses) can integrate with the remaining 85% + plus buses and other traffic.

KcC PC note there is no development of thinking or further detail on the return routing of all HGV and bus traffic since the sketchy detail provided at Stage 3 consultation.

#### **4.7.9 KcC PC note the assertion and refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)**

#### **4.8 Traffic increases on the B1122**

KcC PC note **Tables 4.6, 4.7 and 4.8**

#### **a) Traffic impacts of the integrated strategy**

#### **4.8.1 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)**

#### **4.8.2 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)**

KcC PC note EDF Energy's projected organic growth of traffic on the B1122 as being between **32-33% (without Sizewell C traffic)** between now and Sizewell C peak construction.



KcC PC are interested in the dramatic increase forecast by EDF Energy and would welcome EDF Energy sharing the underpinning rationale for this growth, whether it be employment growth, demographic shifts, housing developments, wealth or other socio-economic drivers.

4.8.3 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

4.8.4 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC continue to be surprised that EDF Energy intend to carry HGV/bus traffic through the westerly end of the B1122 and onto the Sizewell link road via a T junction. It remains to be seen just how easily the Northern flow (15% of the total HGV traffic plus buses) can integrate with the remaining 85% + plus buses and other traffic.

4.8.5 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

**a) Comparison with rail-led and road-led strategies**

4.8.6 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note EDF Energy forecast lower B1122 flows through Theberton and Middleton Moor under the 'integrated' option than either the rail-led or road-led strategies

4.8.7 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note EDF Energy forecasts for the western end of the B1122 at Yoxford

4.8.8 KcC PC note the EDF Energy forecast impact of a Sizewell link road on reducing traffic flows using the B1122

**4.9 Traffic increases on the A12**

4.9.1 KcC PC note **Tables 4.9, 4.10 and 4.11**

**a) Traffic impacts of the integrated strategy**

4.9.2 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note the selected points which EDF Energy chose to identify as having daily traffic flows within the traffic carrying capacity.

4.9.3 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note EDF Energy's assumption that the Two Village Bypass will all but remove the traffic flow from Farnham and Stratford St. Andrew

4.9.4 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

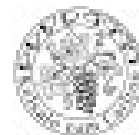
KcC PC note the EDF Energy assertion that despite flow increases being proportionately larger north of the B1122, because of the smaller base they would not exceed the road capacity.

4.9.5 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note the EDF Energy assertion that as the base flow is much higher at Woodbridge, proportionally the flow increases are much smaller. KcC PC note the unsupported EDF Energy assertion that there is some evidence that non-Sizewell traffic would choose other routes to avoid delay in this area, irrespective of whether Sizewell C goes ahead or not.

KcC PC take the degree of exactitude (not evident elsewhere in this or previous consultations) as evidence that EDF Energy have polled opinion from users of the A12 at Woodbridge. That being the case KcC PC wonders why EDF Energy are unwilling to share their findings, thereby putting an end to speculation about likely traffic loading on the A12.





KcC PC also note that EDF Energy are not indicating what “...other routes...” might be favoured if their assertion is borne out.

**b) Comparison with rail-led and road-led strategies**

**4.9.6 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note EDF Energy have swung back from the exactitude of the last paragraph into the vagueness more typical of the traffic analysis, asserting that “*Traffic flows under the integrated strategy generally fall somewhere between those reported of the rail-led and road-led strategies, so the extent of impacts are not substantially different to those presented at Stage 3.*” KcC PC wonder why EDF Energy are so inconsistent in style, language and exactitude when portraying the results of their traffic analysis?

**4.9.7 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note the ambiguity and vagueness of the EDF Energy narrative at 4.8.8 where they state, “*For all locations on the A12, 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 under all three strategies.*”

**4.10 Traffic increases elsewhere**

**4.10.1 KcC PC note Tables 4.12, 4.13 and 4.14**

**a) Traffic impacts of the integrated strategy**

**4.10.2 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note with a wry smile that EDF Energy’s sophisticated traffic analysis has identified proportionately high likely increases in the traffic flows at Saxmundham, Leiston and Westleton. Moreover, they have deduced that this is because of low existing flows and the introduction of a bus service!

**4.10.3 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note that EDF Energy’s traffic analysis has enabled them to identify seven other locations where the relative increase in bus flows or overall traffic volume is substantial, notably:

Lover’s Lane Leiston

B10619 Coldfair Green

B1125 Westleton

B1069 Tunstall

A1120 Yoxford

B1125 Blythburgh

B1078 Wickham Market

KcC PC note EDF Energy attribute this to low base levels and assert that it would not cause the road capacity to be exceeded in any of the cases.

**4.10.4 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note EDF Energy have identified the A14 junction west of the Seven Hills Roundabout as one that will experience “...a large volume of Sizewell C-related trips...”. Despite this and the everyday experience of many Suffolk residents, EDF Energy are quick to point out that the Sizewell C traffic is a very small percentage of the existing traffic levels (albeit intensively HGV weighted) and is not expected to exceed the capacity of the junction.



KcC PC also note that EDF Energy will discuss the investigation of effects on the A12/A14 junctions 55 and 58 with Highways England prior to any ADCO.

KcC PC believe it is very unfortunate that EDF Energy have failed to have critical discussions about these pivotal junctions, with Highways England as part of the Pre-application consultations (or have had conversations and have chosen not to share them).

#### **b) Comparison with rail-led and road-led strategies**

##### **4.10.5 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note the vagueness of the EDF Energy narrative at 4.10.5 where they state, *"These impacts reported under the integrated strategy are similar to those of the rail-led and road-led strategies reported at Stage 3."*

##### **4.10.6 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note EDF Energy say they will **continue** to engage with Parish Councils in respect to potential additional mitigation in these areas following this Stage 4 consultation.

#### **4.11 Summary**

##### **4.11.1 KcC PC note the EDF Energy contention that the effects on the local transport infrastructure *"...would be significantly reduced by the embedded mitigations included within the proposals set out in this Stage 4 consultation namely:***

*Accommodation campus, reducing journeys to work on local roads*

KcC PC regard as – pragmatic, but too much parking conceded rather than P&R

*Direct bus services from Ipswich, Lowestoft and the Leiston area*

KcC PC regard as – pragmatic, will be interested to understand how well it is utilised

*Park and ride facilities*

KcC PC regard as – sensible but could be more effective if P&R has a car-sharing threshold of 3+

*Rail and the BLF delivering freight*

KcC PC regard as – rail is a lost 'one shot' opportunity, and the BLF is questionable

*The two village bypass*

KcC PC regard as – a sub-optimal solution to not just Sizewell C but the weaknesses of the A12

*The Sizewell link road*

KcC PC regard as – a wasted opportunity to greatly reduce the environmental impact of Sizewell C by going direct, rather than dragging everything unnecessarily too far north before going east

*Junction improvements to improve safety and/or increase capacity*

KcC PC regard as – largely cosmetic, when bigger improvements should be made

##### **4.11.2 KcC PC refer EDF Energy to ISSUES 51, 53, 54 & 55 (above)**

KcC PC note **Tables 4.2 to 4.5**

KcC PC note that EDF Energy concede that 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"*. The Parish Council also notes that EDF Energy persist in saying that despite this, because the



majority are from a low base, the resulting traffic volumes would not exceed the carrying capacity of the road network. Further they suggest that *"...they are unlikely to cause additional congestion or delays..."*.

4.11.3 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note that EDF Energy have remembered that the environmental impacts including noise, air quality, dust, vibration, etc. must *"...be considered."*

4.11.4 KcC PC refer EDF Energy to **ISSUES 49, 50, 51 & 52** (above)

KcC PC note that EDF Energy have concluded that the 'integrated' option being brought forward at **Stage 4** will have traffic flows generally(?) lower than for the road-led strategy, and therefore the associated impacts are predicted to be less.

KcC PC note that even at Stage 4, EDF Energy have not completed the modelling on the 'integrated' proposal they have chosen to bring forward at this time. Consequently, they intend to complete the modelling beyond **Stage 4** thereby denying consultees the opportunity to know the likely impacts prior to any ADCO being submitted.

4.11.5 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC again note **Tables 4.4 & 4.5**

KcC PC note with increasing incredulity that EDF Energy advise that *"...at locations geographically more distant from the construction site, the increases arising from the Project diminish and become an increasingly small increment on predicted future traffic flows."* So, KcC PC is forced to conclude that, although this provides no solace at all to those in Coastal Suffolk, residents of Scotland will be gratified to receive the reassurance!

4.11.6 KcC PC refer EDF Energy to **ISSUES 51, 53, 54 & 55** (above)

KcC PC note EDF Energy refer to **Chapter 6** for changes made to mitigations proposed at **Stage 3**.

## **5. MAIN DEVELOPMENT SITE**

### **5.1 Introduction**

5.1.1 KcC PC note the precis of the Main Development Site and references out to **Chapter 2** of the **Stage 4 consultation** and **Volume 1, Chapter 7** of the **Stage 3 Main Consultation Document**. It also notes that EDF Energy persist in referring to the previously inadequate, incomplete and incorrect (in part) PEI presented at **Stage 3**.

5.1.2 KcC PC note that EDF Energy continue, in common with other areas, to increase the 'land take' at the Main Development Site, bringing forward proposals for enlarging the red line boundary that they intend to *"...apply for powers over..."*.

KcC PC note at **Figure 5.1** that many of the extensions to the red boundary are far beyond what could be called a 'minor change'. KcC PC also note that the *"...area removed since Stage 3..."* has no beneficial impact, as it is immediately adjacent and effectively 'landlocked' by Sizewell B buildings and services.

5.1.3 KcC PC is relieved to note that EDF Energy are continuing to carry out environmental assessments and hope that they contribute to overcoming the inadequacies, inaccuracies and incorrect areas of the **PEI at Stage 3**.

KcC PC note that EDF Energy having brought forward mitigation proposals at **Stage 3**, state that the mitigation that they are relying on also includes land not within the red line boundary, *"...but under EDF Energy's control"*.

5.1.4 KcC PC note the methodology that EDF Energy are using to demonstrate changes made since **Stage 3**, including changes to the PEI, red line boundaries, mitigation proposals, etc.

5.1.5 KcC PC note EDF Energy's assertion that *"Most of the changes are a result of designs developing in detail and assessments reaching a new level of maturity"* and that they welcome *"...views on the changes..."*.



5.1.6 KcC PC note the structure of **Chapter 5**.

**Figure 5.1** at pages 108 and 109 is noted

**5.2 Access roundabout and approach roads**

5.2.1 KcC PC note that in describing the purpose of the main entrance, EDF Energy outline the broader context of usage (e.g. HGV and LGV deliveries, works and visitor vehicles and external bus connections).

This is in sharp contrast to the bulk of the **Stage 4** consultation document where EDF Energy appear to have deliberately avoided taking the narrative much beyond HGV and Park & Ride buses.

Could this be pure coincidence, or is it part of a deliberate strategy to minimise the vehicular 'negatives' of the construction phase and maximise the 'positives' of needing to provide control of access, security and public reassurance during the operational phase?

**a) Red line boundary change**

5.2.2 KcC PC note in **Figure 5.2** that the consequences of 5.2.1 is a significant movement of the red line boundary, increasing the 'land take' and destroying more agricultural land and woodland plus the habitats they support.

**b) Description of the Project change**

5.2.3 KcC PC note EDF Energy's initial design for the roundabout was for traffic travelling at 30mph.

5.2.4 KcC PC note that EDF Energy attribute responsibility for the change in the boundary to SCC, as it was them that suggested a 40mph design would be preferable. This situation leads KcC PC to question how much **pre-Stage 3** consultation EDF Energy undertook with the appropriate stakeholders? KcC PC note that The Project may be suffering the consequences of a maxim, very familiar to the project management fraternity - **"...fail to prepare, prepare to fail..."**.

**c) Why this change is necessary**

5.2.5 KcC PC note that EDF Energy state *"...additional land would be needed to accommodate a revised design of the roundabout if ongoing discussions with SCC conclude this is needed"*.

5.2.6 KcC PC note that EDF Energy have yet to complete an assessment of the impacts of this change in the red line on the environment, woodland, Greenhouse Plantation and Leiston Abbey. KcC PC also note that until this is complete EDF Energy **are not outlining any mitigation**.

**5.3 National Grid pylons**

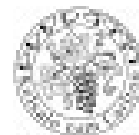
5.3.1 KcC PC note that in describing the background to the pylons, EDF Energy seem intent to infer that the pylon issue is one sitting solely in the bailiwick of National Grid, rather than (as sponsors and managers of The Project) a foreseeable issue that both parties have a responsibility for resolving.

**a) Red line boundary change**

5.3.2 KcC PC note the consequence of 5.3.1 is a significant movement of the red line boundary, increasing the 'land take' within the SSSI albeit on a temporary rather than a permanent basis. However, as this change involves the SSSI, KcC PC are concerned about the absolute necessity of the intrusion.

If approved, KcC PC would expect EDF Energy to bring forward a comprehensive mitigation plan providing details of the extensive safeguards that will be put in place prior to any intrusion into the SSSI being made.

5.3.3 KcC PC note in **Figures 5.3 to 5.4** and the attendant narrative (i.e. this paragraph) that EDF Energy attempt to link the return of another (and separate) portion of the SSSI as some sort of 'dividend' arising from their design development.



KcC PC are concerned that this primitive attempt at 'horse trading' tracts of the SSSI should be admonished and deterred in the strongest possible terms.

The environment in KcC PC's view should never be reduced to a bargaining chip in a detestable game of corporate poker.

#### **b) Description of the Project change**

- 5.3.4 KcC PC note EDF Energy advise that National Grid have now engaged a contractor to investigate the feasibility of this work and develop the design.

KcC PC are concerned that this may mean EDF Energy return yet again, potentially to intrude further into the SSSI and consequently KcC PC seek assurance that all steps will be taken to avoid intrusion into the SSSI, whether temporarily or on a permanent basis.

KcC PC note the confirmation of National Grid (via EDF Energy) that whilst the overall number of pylons will not increase, one needs to be removed, the other needs to be retained (or replaced in the same location) and a location to the north of the existing ones need to have a pylon sited on it.

KcC PC note this implies considerable and disruptive work at three locations and is concerned that all steps are taken to ensure the absolute minimum of damage to the SSSI is sustained. KcC PC would expect to see this potentially damaging work 'safeguarded' by an independent body, with appropriate engineering and ecological credentials.

- 5.3.5 KcC PC note the technical advice provided and that; analysis, finalised design, location and associated details for the northern pylon have yet to be completed. KcC PC are once again very concerned that another issue will potentially not have been fully consulted on at the point that any ADCO is made.
- 5.3.6 KcC PC are alarmed at the prospect of unfettered *"...vegetation clearance (including tree felling)..."* may be undertaken without appropriate and adequate supervision. Consequently, KcC PC would expect to see this potentially damaging work 'safeguarded' by an independent body, with appropriate arboriculture, engineering and ecological credentials.

#### **c) Why this change is necessary**

- 5.3.7 KcC PC note that EDF Energy state *"...additional land underneath the overhead lines is necessary...to carry out the works required to connect Sizewell C to the substation."*

### **5.4 Sizewell C pylons**

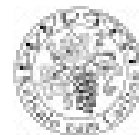
- 5.4.1 KcC PC note that EDF Energy are *"...continuing to assess options for the electrical connection between Sizewell C and the National Grid substation."* and once again regret that another issue will potentially not have been fully consulted on at the point that any ADCO is made.

#### **a) Red line boundary change**

- 5.4.2 KcC PC note EDF Energy's confirmation that there is no red line boundary change as a result of the continuance of; options assessment, design development and option selection. Nevertheless, KcC PC are once again very concerned that another issue will potentially not have been fully consulted on at the point that any ADCO is made.

#### **b) Description of the Project change**

- 5.4.3 KcC PC note confirmation by EDF Energy of their position at **Stage 3**, specifically four pylons between the National Grid substation and the turbine halls.
- 5.4.4 KcC PC note **Stage 3** feedback is said to have shown a preference for underground electrical connection. EDF Energy are continuing to assess the practicability and the implications for the Project, which EDF Energy believe will be significant.



KcC PC note that whilst asserting the implications may be significant, EDF Energy do not identify or quantify the likely areas impacted (i.e. time, cost, quality, etc.).

5.4.5 Given the absence of any identification or quantification (excepting *"...significant..."*) of potential issues, KcC PC are concerned that EDF Energy appear to be putting all their efforts into coming up with alternative arrangements for pylons, thereby reducing the visual impact.

5.4.6 KcC PC note that since **Stage 3** feedback, EDF Energy have achieved a net reduction of 25% in the height of all bar one of the pylons. That pylon would need relocating close to SSSI to achieve the same reduction, thereby enabling lines to go around the emergency diesel generator building, rather than over it.

5.4.7 KcC PC note that despite not dismissing the underground option, EDF Energy are only consulting on pylon options at **Stage 4**.

Once again, KcC PC regret that another issue will potentially not have been fully consulted on at the point that any ADCO is made.

5.4.8 KcC PC note **Figures 5.5 -5.14** but find the continuing visual intrusion not moderated sufficiently enough to dissuade them from continuing to support an underground connection as the only acceptable method.

#### **c) Why this change is necessary**

5.4.9 KcC PC note that EDF Energy state *"...options have been developed in response to consultation feedback to minimise the visual impact..."*.

### **5.5 A rail spur at land east of Eastlands Industrial Estate (LEEIE)**

5.5.1 KcC PC note that EDF Energy are *"...continuing to assess options for development at the LEEIE"*. KcC PC also note that EDF Energy are bringing forward a totally new proposal at **Stage 4**, bringing the number of options still 'live' up to three.

KcC PC are concerned that each option probably has very differing impacts on those living and/or conducting business close by the LEEIE. Consequently, KcC PC feels unable (with the information provided) to determine which option is preferable, insofar as the differing impacts (i.e. noise, dust, etc.) are not identified, nor indeed how those impacts vary, dependent on proximity and location to the LEEIE.

#### **a) Red line boundary change**

5.5.2 KcC PC note EDF Energy's confirmation that there is no red line boundary change as a result of the continuance of; options assessment, design development and option selection.

#### **b) Description of the Project change**

5.5.3 KcC PC note EDF Energy have identified an alternative location for the rail head, whilst uses within the LEEIE remain the same. EDF Energy advise that **Figure 5.15** demonstrates that Topsoil storage is moved slightly further away from properties on Valley Road under this option and that the Park and Ride is similarly moved further from Crown Lodge.

#### **c) Why this change is necessary**

5.5.4 KcC PC note that EDF Energy state *"...This option results in a straighter alignment of the rail track....allowing longer trains to be used and more freight to be delivered per train..."*. However, KcC PC are concerned that this 'beneficial' change may result in changes to, or additional detrimental impacts on residents and business operators.

### **5.6 Public Right of Way and Bridleway 19 Diversion**

5.6.1 KcC PC note that EDF Energy concede that through the construction and operation of Sizewell C there would be impacts on PRoW.





KcC PC note that EDF Energy make **no mention of the situation during the decommissioning phase** of Sizewell C and insist EDF Energy rectify this act of omission prior to making any ADCO.

- 5.6.2 KcC PC note EDF Energy refer to **Volume 1, Chapter 17, Sections 17.11 and 17.12 of the Stage 3 Consultation Document** for access strategy. KcC PC note that Bridleway 19 currently runs through the proposed main construction area and consequently will also be diverted throughout the construction phase.

**a) Red line boundary change**

- 5.6.3 KcC PC note EDF Energy are increasing the 'land take' to accommodate a wider bridleway corridor.

**b) Description of the Project change**

- 5.6.4 KcC PC note EDF Energy are now proposing an 8 metre wide bridleway diversion, comprising a 5 metre bridleway and a 3 metre combined footpath and cycle path, surfaced to bridleway standard and other facilities to British Horse Society design guidelines.
- 5.6.5 KcC PC note **Figure 5.16** and the narrative outlining the route of the bridleway.
- 5.6.6 KcC PC note the description of Pegasus Crossings and where EDF Energy propose to deploy them.
- 5.6.7 KcC note the additional details provided in the narrative and at **Figures 5.17 and 5.18**

**c) Why this change is necessary**

- 5.6.8 KcC PC note the justifications put forward by EDF Energy and support them if they meet the needs of the anticipated users.
- 5.6.9 KcC PC note the justifications put forward by EDF Energy and support them if they meet the needs of the anticipated users.
- 5.6.10 KcC PC note the justifications put forward by EDF Energy and support them if they meet the needs of the anticipated users.

**5.7 Leiston off-site sports facilities**

- 5.7.1 KcC PC note the EDF Energy precis of the background to the sports facilities and the potential legacy for the Leiston Academy and surrounding area.

KcC PC note that **EDF Energy remain silent on the anticipated situation during the operational and decommissioning phases of Sizewell C** and insist EDF Energy rectify this act of omission prior to making any ADCO.

- 5.7.2 KcC PC note EDF Energy summary of the likely facilities that will be provided and assume that this is being developed with the necessary stakeholders and beneficiaries.

**a) Red line boundary change**

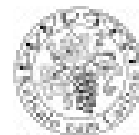
- 5.7.3 KcC PC note EDF Energy are increasing the 'land take' within the red line boundary, to include the entire school field and presume this is being done with the total agreement of all of the necessary stakeholders and potential beneficiaries.

**b) Description of the Project change**

- 5.7.4 KcC PC note EDF Energy's precis

**c) Why this change is necessary**

- 5.7.5 KcC PC note the justifications put forward by EDF Energy and support them if they meet the needs of the anticipated users and the surrounding residential representatives.



## **5.8 Round House**

### **a) Red line boundary change**

5.8.1 KcC PC note the EDF Energy precis and the proposed revision at **Figure 5.20**

### **b) Description of the Project change**

5.8.2 KcC PC note EDF Energy are increasing the 'land take' within the red line boundary, to include the entire Round House property.

KcC also note that no works will take place to the property and it will be protected in-situ during the construction phase.

KcC PC are concerned that no mention is made of **any programme of inspection and protective 'works' during the potentially protracted construction phase**. In the absence of this being agreed already, KcC PC would expect an agreement to be made with stakeholders and made public prior to any ADCO.

KcC PC also presume, all the foregoing is being done with the total agreement of all the necessary stakeholders and potential beneficiaries. If this is not the case KcC PC would expect this to be made public during or prior to any ADCO.

### **c) Why this change is necessary**

5.8.3 KcC PC note with some unease the implied breakdown in relations between EDF Energy and the '[...affected landowner...](#)' and would be unable to support the change unless an agreement is forthcoming that meets the needs of the landowner.

Further, KcC PC believes that EDF Energy should pursue a mutually acceptable resolution with due rapidity and if necessary, utilise an independent arbitrator to facilitate this, prior to any ADCO being made.

## **5.9 Kenton Hills car park**

5.9.1 KcC PC note the EDF Energy precis regarding the location and amenity

### **a) Red line boundary change**

5.9.2 KcC PC note the EDF Energy precis and the proposed revision at **Figure 5.21**

### **b) Description of the Project change**

5.9.3 KcC PC note EDF Energy are increasing the 'land take' within the red line boundary, to include the car park and thereby enable them to undertake a programme of 'improvements'.

KcC PC assume, all the foregoing is being done with the total agreement of all the necessary stakeholders and potential beneficiaries. If this is not the case KcC PC would expect this to be made public during or prior to any ADCO.

### **c) Why this change is necessary**

5.9.4 KcC PC note the stated intent of EDF Energy and support the change with the proviso that it is conditional on all necessary stakeholders being similarly-minded.

## **5.10 Marsh Harrier compensation land**

5.10.1 KcC PC note the EDF Energy precis and referencing out to **Volume 2A, Chapter 2 of the Stage 3 Consultation Document**.



**a) Red line boundary change**

- 5.10.2 KcC PC note EDF Energy are potentially increasing the overall 'land take' of the Project with new red line boundaries being proposed at three locations for Marsh Harrier compensatory land, totalling in excess of 160ha.

KcC PC note the proposed locations at **Figures 5.22 to 5.24**

KcC PC are concerned at the efficacy of the proposed locations and would welcome evidence that any of these options meet the criteria of any other successful Marsh Harrier programme of this scale in the UK, or failing that, Northern Europe.

**b) Description of the Project change**

- 5.10.3 KcC PC note EDF Energy is currently establishing compensatory habitat on the EDF Energy estate and is providing for these additional sites *"...in case this compensatory habitat provides insufficient foraging for Marsh Harriers."*

KcC PC, applauds EDF Energy's candour regarding the potential inadequacy of the habitat on the EDF Energy estate.

However, it is also very concerned that these birds are wild creatures (and don't follow sign posts), so although the survival instinct may compel them to forage further afield, there can be no guarantee that the Sizewell C Project will not force them to permanently abandon the Sizewell, Minsmere and the Coastal Suffolk area completely.

Consequently, whilst the compensatory proposals may look reasonable, KcC PC believe that EDF Energy are doing no more than 'throwing the dice' and hoping that they hit upon a formula that retains the area as a viable, sustainable and long term habitat, irrespective of the twelve years of disruptive; noise, dust and light pollution.

- 5.10.4 KcC PC note that EDF Energy are not necessarily committed to the full extent of these compensatory proposals and may not include all or parts of them in their ADCO.
- 5.10.5 KcC PC note the habitat creation outline and assume that EDF Energy propose to consult with and employ very experienced agents for this work, to maximise the likelihood of Marsh Harriers exploiting the newly created foraging area(s).

KcC PC expect to see detailed arrangements made available for public scrutiny at or before the submission of any ADCO.

**c) Why this change is necessary**

- 5.10.6 KcC PC note the explanation of EDF Energy for this change but regret that the future of the breeding Marsh Harrier population in the locality will undoubtedly be threatened by the Sizewell Project.

**5.11 Fen meadow compensation land**

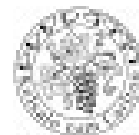
- 5.11.1 KcC PC note the EDF Energy precis and referencing out to the Stage 3 Consultation Document.
- 5.11.2 KcC PC note the EDF Energy precis and their acceptance that Aldhurst Farm does not compensate adequately for some elements of the existing SSSI, hence their proposals for additional compensatory land.

**a) Red line boundary change**

- 5.11.3 KcC PC note EDF Energy are potentially increasing the overall 'land take' of the Project with new red line boundaries being proposed at two locations for fen meadow compensatory land, totalling just short of 17ha.

KcC PC note the proposed locations at **Figures 5.25 (South of Benhall)** and **5.26 (East of Halesworth)**

**b) Description of the Project change**



- 5.11.4 KcC PC note EDF Energy strongly believe these sites to have good potential for creating new fen meadow habitats over the long-term and that they have both been surveyed in detail.
- 5.11.5 KcC PC are less enthused by EDF Energy's observation that the *"...full extent of both of the two options would not be required and the extent is likely to be refined further to making our application for development consent."*

Consequently, unless there is significant and sustained opposition from the local communities, KcC PC would propose that the full extent of both should be utilised as compensatory habitat for that lost at the Main Development site and that an endowment should be made by EDF Energy to the local communities to support the management and upkeep of the habitats into the future, thereby securing the EDF Energy compensatory legacy for future generations.

**c) Why this change is necessary**

- 5.11.6 KcC PC note the explanation of EDF Energy for this change and commend to EDF Energy KcC PC's thoughts on adoption of the full extent of both locations and community endowment to secure the compensatory legacy.

**5.12 Flood compensation land**

**a) Red line boundary change**

- 5.12.1 KcC PC note EDF Energy are potentially increasing the overall 'land take' of the Project with new red line boundaries being proposed at two locations for flood compensation land at **Figures 5.27 (East of Lower Abbey Farm)** and **5.28 (South of Sandy Lane)**.

**b) Description of the Project change**

- 5.12.2 KcC PC note EDF Energy's narrative regarding the FCAs and their role in extending the functional flood plain.
- The Parish Council also notes that EDF Energy intend to avoid an engineered appearance, adopting a naturalistic design as a preference.
- 5.12.3 KcC PC note and welcome the potential for the design to incorporate wildlife habitats, such as reedbeds or wet woodlands.
- 5.12.4 KcC PC note the EDF Energy outline plan for the management of spoil. KcC PC once again hope that these details have been developed in conjunction with the people and communities impacted.
- 5.12.5 KcC PC note the EDF Energy temporal proposal for the work associated with this element of the Project and its intent to secure concurrency with the works at the SSSI crossing.

**c) Why this change is necessary**

- 5.12.6 KcC PC note these works provide for circa 90,000 cubic metres of floodplain volume.
- KcC PC also note that the scheme is intended to be complementary to the Marsh Harrier mitigation activity.
- KcC also note the FCAs are permanent features but are concerned that this attribute has not been mentioned in connection with the Marsh Harrier and Fen Meadow compensatory land. KcC PC call on EDF Energy to clarify the aforesaid omissions.

**5.13 Preliminary Environmental Information [PEI]**

**a) Red line boundary change and design changes**

- 5.13.1 KcC PC note EDF Energy's introduction to this section
- 5.13.2 KcC PC note EDF Energy reference **Volume 2A, Chapter 2** of the **Stage 3 Consultation Document**.

KcC PC note **Table 5.1** on pages **131 to 142** that EDF Energy declare to be an update from the **Stage 3 PEI (at Volume 2A)**. and refer EDF Energy to specific comments made above.



## **6. ASSOCIATED DEVELOPMENT**

### **6.1 Introduction**

6.1.1 KcC PC note the narrative and points of reference provided by EDF Energy, specifically **Chapter 2** of the **Stage 4** Consultation Document and **Chapters 8-17** of the **Stage 3** Main Consultation Document. Preliminary environment information [PEI], previously noted as inadequate, incomplete and incorrect (in places) in **Volume 2A, Chapters 3-6** and **Volume 2B, Chapters 7-12** of the **Stage 3** Main Consultation Document.

6.1.2 KcC PC note the EDF Energy explanation of **Chapter 6**.

6.1.3 KcC PC note EDF Energy hold the view that *"...majority of the changes proposed to the Associated Development...involve minor changes to the site boundary...to reflect further design work...respond to feedback or...more accurately align the red lines with land ownership..."*

6.1.4 KcC PC note the previously advised change in approach to traffic mitigation in Wickham Market.

6.1.5 KcC PC note the previously advised request by EDF Energy for consultees to provide views on whether the proposed Sizewell link road should remain after the construction phase as a permanent link or be removed (in part or in total).

*KcC PC's view remains that expressed earlier in this response. Specifically, on completion of the Sizewell C construction phase, the Sizewell Link Road (in its entirety) should be removed and the land returned to agricultural use, along with hedges, trees and plants consistent with that existing at the point any ADCO was submitted.*

6.1.6 KcC PC note that apart from the changes and alternative options in this chapter (**Chapter 6**), EDF Energy's proposals remain as those stated at **Stage 3**.

6.1.7 KcC PC note EDF Energy welcome EDF Energy's views on the changes and alternatives.

6.1.8 KcC PC note that **Chapter 6** (this Chapter) only describes changes to the **Associated Developments** brought forward at **Stage 3**.

KcC PC also note that where no changes are proposed to a development, then it is not referred to.

6.1.9 KcC PC note the structure of **Chapter 6**.

### **6.2 Rail**

6.2.1 KcC PC note there are no changes to the Green Rail Route or any of the other rail improvement proposals, with the notable exception of the Saxmundham to Leiston branch line and the level crossings that lie along it.

KcC PC note that the branch line as described above is now proposed to be included within the Application Red Line Boundary.

KcC PC draw EDF Energy's attention to the comments of KcC PC made previously in this response.

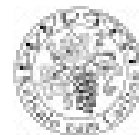
#### **a) Description of the change**

6.2.2 KcC PC note **Figure 6.1** and the changes to the red line boundary it is intended to (but does not clearly) portray.

#### **ISSUE 56 - INADEQUACY OF THE CLARITY AND SCALE OF FIGURES IN CHAPTER 6**

KcC PC draw EDF Energy's attention to the completely inadequate nature of the figure, both in terms of size, detail and clarity.

Whilst KcC PC are well acquainted with the route, the level of detail, even under a magnifying glass is laughable.



6.2.3 KcC PC note EDF Energy's narrative indicating there is no change to the proposal, excepting the inclusion of whole Saxmundham to Leiston branch line in the development red line boundary.

6.2.4 KcC PC note the inclusion of five of the nine crossings on the branch line at **Stage 3**

6.2.5 KcC PC note the four other crossings on the branch line are now also proposed to be included in the red line boundary.

**b) Why these changes are necessary**

6.2.6 KcC PC note the assertion from EDF Energy that inclusion in the red line boundary *"...provides the flexibility for these works to be undertaken either by Network Rail or EDF Energy."*

KcC PC draw EDF Energy's attention to their comments made earlier in this response at **ISSUES 10-14**

6.2.7 KcC PC note the narrative regarding *"...are to include additional highways or Network Rail land required for the upgrade works."* and once again point out the inadequacy of the figure (**Figure 6.1**)

**c) Preliminary Environmental Information**

6.2.8 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of **Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the **PEI at Stage 3**.

6.2.9 KcC PC note that **Volume 2A, Chapter 4** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.1**.

6.2.10 KcC PC note EDF Energy referring out to **Chapter 3** of the **Stage 4 Consultation Document** for details of the road traffic and rail movement on the branch line impacts arising from the 'integrated' option.

6.2.11 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the other rail improvements as set out in the Stage 3 PEI...remain valid."* Further they go on to say that despite the assertion at **6.2.8 above**, that *"The need for further survey work along the Saxmundham to Leiston branch line to inform the baseline will be reviewed and undertaken..."*

6.2.12 KcC PC note EDF Energy continue to have discussions with Network Rail to determine the upgrades that may be required to the existing Saxmundham to Leiston branch line and East Suffolk line. EDF affirm they will continue to liaise with Network Rail to develop the rail proposals.

KcC PC note that elsewhere in the **Stage 4** consultation EDF Energy are; critical of Network Rail and seeking to include the branch line within the red line boundary to 'garner' control over the branch line dependency, yet simultaneously must presumably be reliant on Network Rail for continuing advice, guidance and co-operation.

Through the eyes of a third party, this is an area where unnecessary risk may be incurred further down the track(sic).

**Table 6.1** at page 145 is noted

**Terrestrial ecology and ornithology** – KcC PC note the presence of turtle doves in close proximity to the branch line as it passes through Clay Hills, as well as shortly after Knodishall Crossing going East.

**Terrestrial historic environment** – KcC PC note the existence of a non-designated heritage asset at the road junction of East Green with Hawthorn Road (a three arm fingerpost road sign) at Eastings 640648 & Northing 264603 (the grid reference is TM406646), north east of Knodishall Crossing. Road based construction vehicles should be cognisant and avoid close proximity manoeuvres.





## **6.3 Sizewell link road**

### **a) Description of the change**

- 6.3.1 KcC PC note **Figure 6.2** and **Figures 6.3 – 6.7** and once again draw EDF Energy's attention to the completely inadequate nature of those figures, both in terms of size, detail and clarity.

Whilst KcC PC are well acquainted with the route, the level of detail discernible in these figures, even under a magnifying glass is laughable.

KcC PC suggest that excerpts from the Ordnance Survey would have been a far better vehicle.

KcC PC also draw EDF Energy's attention to its comments, concerns and issues with the Sizewell link proposals, made at the **Stage 3 Consultation** and **associated PEI** and again now, earlier in **this response to the Stage 4 Consultation**.

- 6.3.2 KcC PC note **Figure 6.3** and the change to the red line boundary adjacent to Fir Tree Farm. KcC PC are concerned to understand the motive for EDF making this change as no explanation is given?

In contrast, KcC PC note the continuing proximity of the red line boundary to Rosetta Cottage at the south-western boundary and again wonder why no concession has been made?

On the broader point, KcC PC are concerned at the apparent disinterest of EDF Energy in meeting and discussing issues with parties impacted by the proposed western roundabout and associated works. Specifically, those at the western end of North Green (Town Farm Lane) and the A12.

- 6.3.3 KcC PC note **Figure 6.4** and the change to the red line boundary returning a small piece of land to the south-eastern corner, whilst increasing the 'land take' considerably at two other locations immediately adjacent to the proposed link road.

- 6.3.4 KcC PC note the intention to stop up the northern segment of Littlemoor Road but note the absence of an explanation.

As both Littlemoor and Fordley Roads potentially provide access to; Kelsale cum Carlton, its narrow lanes network, nature reserves, designated Conservation Area, weight limited bridges, non-designated heritage assets and manual level crossing, the Parish Council are awake to the prospect of EDF Energy's proposals creating 'rat runs' that would threaten residents, businesses and the amenity the KcC Parish provides to visitors to Coastal Suffolk.

Consequently, KcC PC draw EDF Energy's attention to the very limited routing options available from Littlemoor and Fordley Roads, described earlier in this response.

- 6.3.5 KcC PC note **Figure 6.5** and once again are concerned with the scale, clarity and detail visible to the naked eye, in respect to the changes be brought forward at **Stage 4**.

- 6.3.6 KcC PC note the intention to stop up the northern segment of Littlemoor Road and consequently, bring forward the creation of a Fordley Road junction with the proposed link road.

As both Littlemoor and Fordley Roads potentially provide access to; Kelsale cum Carlton, its narrow lanes network, nature reserves, designated Conservation Area, weight limited bridges, non-designated heritage assets and manual level crossing KcC PC are awake to the prospect of EDF Energy's proposals creating 'rat runs' that would threaten residents, businesses and the amenity Kelsale cum Carlton provides to visitors to Coastal Suffolk.

Consequently, KcC PC draw EDF Energy's attention to the very limited routing options available from Littlemoor and Fordley Roads, described earlier in this response, and their outright opposition to this proposal.

- 6.3.7 KcC PC note the proposals at 6.3.7 and assume that this proposal is with the consent of the impacted landowner(s)/residents.



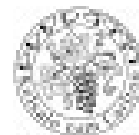
- 6.3.8 KcC PC are opposed to the speed limit change proposed at 6.3.8 and regard the Sizewell link road as a potentially very dangerous road, where speed limits should be enforced rigorously.
- 6.3.9 KcC PC note **Figure 6.6** and once again are concerned with the scale, clarity and detail visible to the naked eye, in respect to the changes be brought forward at **Stage 4**.
- KcC PC note the increased 'land take', particularly around Pretty Road and are unclear exactly what is motivating the proposed changes
- 6.3.10 KcC PC note that Pretty Road is to be bridged over the Sizewell link road (the only place identified as where this happens, as far as can be ascertained.) Moreover, the bridging is explicitly advised to be for 'non-motorised user connectivity'. KcC PC note that no explanation for this provision is given and wonder why this anomaly has arisen.
- 6.3.11 KcC PC note that to facilitate the bridging (above) EDF Energy intend to place the alignment of the link road in a deeper cutting, further elevating the importance of this singular bridging point.
- 6.3.12 KcC PC note that were the link road not implemented, the changes would be incorporated into the Theberton bypass
- 6.3.13 KcC PC note there are no proposed changes to the area described by **Figure 6.7**.
- 6.3.14 KcC PC note EDF Energy are consulting on whether the Sizewell link road should remain after completion of the construction phase. **For the avoidance of doubt, on this specific point the view of KcC PC continues to be that made in the earlier part of its response i.e. total removal and reinstatement.**

**b) Why these changes are necessary**

- 6.3.15 KcC PC note that EDF Energy regard the changes at **Stage 4** as *"...mostly minor boundary changes"*.
- 6.3.16 KcC PC note that changes at **Areas 2 & 4** are to allow the physical improvement to PROW.
- 6.3.17 KcC PC note that the change to **Area 3** returns land not required to conduct works in the Fordley Road area.
- 6.3.18 KcC PC note that the substantial 'land take' at **Area 3** is to facilitate access to land to the north of the existing B1122. It is assumed that this proposal is being developed in conjunction with Trust Farm and other impacted parties. If this is not the case, KcC PC would have grave concerns and resist the change.
- 6.3.19 KcC PC note the EDF Energy narrative but do little to explain the underpinning need driving the development.
- 6.3.20 KcC PC note EDF Energy are consulting on whether the Sizewell link road should remain after completion of the construction phase. For the avoidance of doubt, the view of KcC PC continues to be that made in the earlier part of its response.

**c) Preliminary Environmental Information**

- 6.3.21 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of **Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the **PEI at Stage 3**.
- 6.3.22 KcC PC note that **Volume 2A, Chapter 4** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.2**.
- 6.3.23 KcC PC note EDF Energy refer to **Chapter 3** of the **Stage 4 Consultation Document** for details of the 'road traffic' and 'rail movement on the branch line' impacts arising from the 'integrated' option.
- 6.3.24 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the Sizewell link road as set out in the Stage 3 PEI...remain valid."* Further they go on to say that *"...in addition to the Stage 3 PEI proposals, a capacity assessment of the junction*



*with the A12 and a Stage 1 Road Safety Audit of the Sizewell link road is still proposed. The need for further survey work to inform the baseline will be reviewed and undertaken where required, subject to access."*

**Table 6.2** at page 153 is noted

**Landscape and visual impact assessment** – KcC PC note that the landscape design will need to be amended if EDF Energy pursue the proposed utilisation of Fordley Road for a junction with the proposed Sizewell link road.

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Amenity and recreation** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Noise & vibration** – KcC PC note the EDF Energy narrative

**Traffic and transport** – KcC PC note that *"During construction of the Fordley Road connection, all local road users would be diverted via Littlemoor Road. This would be a temporary diversion during the construction of the Sizewell link road compared to a permanent diversion presented in the Stage 3 PEI."* KcC PC draw EDF Energy's attention to the concerns expressed earlier in this response regarding the proposed Fordley Road and Sizewell link road junction.

6.3.25 KcC PC note that the **Stage 3 PEI** and the updated assessments summarised at **Table 6.2** assumed that the Sizewell link road was permanent.

KcC PC note that if the Sizewell link road were agreed to be a temporary, the road and associated infrastructure would be removed and reinstated following the construction of Sizewell C.

#### **ISSUE 57 – SIZEWELL LINK REMOVAL AND REINSTATEMENT**

KcC PC note the reinstatement works may need up to two years of work before completion.

KcC PC believe that as this effectively reflects another facet of the 'full life cost' linked to EDF Energy imposing a requirement on the Coastal Suffolk area, that it would otherwise not want, it should be considered at the point any ADCO is made.

Likewise, KcC PC would expect that EDF Energy, under these circumstances should also be entirely responsible for the upkeep, renewal and replacement of the Sizewell link road-surface, road-bed and ancillary components, for the duration of its existence.

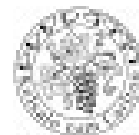
Irrespective, KcC PC reaffirm its view that the Sizewell link should be removed, and the totality of the red line boundary reinstated to the same standard (or better) than existed prior to the Project. To achieve this, KcC PC believe it is essential that a comprehensive independent survey and audit of the red line boundary covering all of the EIA categories should be made prior to any work being initiated.

#### **6.4 Theberton bypass**

##### **a) Description of the change**

6.4.1 KcC PC note the Theberton bypass would only be progressed in isolation as part of the rail-led strategy and has not changed since Stage 3.

6.4.2 However, KcC PC note that changes would occur, consistent with the changes proposed for this section of road when considered as a component of the proposed Sizewell link road.



Specifically:

- additional 'land take' at Pretty Road
- the bridging over the bypass for crossing by non-motorised means
- a deeper cutting and the increased 'land take' (above) to facilitate the bridging
- the increased land take facilitating the inclusion of the PRoW to the south west of the bypass.

6.4.3 KcC PC note that EDF Energy are seeking views as to whether the Theberton bypass should be considered similarly to the Sizewell link road. That is, should it be permanent or should the land utilised be reinstated on completion of Sizewell C's construction.

KcC PC note that in this case, there may be benefits to the Theberton community beyond the construction phase. Consequently, KcC PC believe the views of Theberton residents, businesses and farmers should be fully considered and provide the 'thought leadership'. In the absence of consensus, KcC PC are minded to seek the reinstatement of the land, with the same caveat that the 'full life cost' (and all that it entails) should be visible at the point any ADCO is made.

For the avoidance of doubt this includes the requirement for EDF to maintain, repair and renew as required throughout the bypass's operational life and pay for the reinstatement to the standards pertaining prior to its construction. To achieve this, KcC PC believe it is essential that a comprehensive independent survey and audit of the red line boundary covering all of the EIA categories should be made prior to any work being initiated.

#### **b) Why these changes are necessary**

6.4.4 KcC PC note EDF Energy's justification for the increased 'land take' but are concerned that at a Stage 4 consultation 'land take' is still being justified with *"...may be required..."*, rather than clarity and certainty.

6.4.5 KcC PC note EDF Energy's justification for the increased 'land take'

#### **c) Preliminary Environmental Information**

6.4.6 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of **Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the **PEI at Stage 3**.

6.4.7 KcC PC note that **Volume 2A, Chapter 6** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.3**.

6.4.8 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the Theberton bypass as set out in the Stage 3 PEI...remain valid."*

Further they go on to say that *"...The need for further survey work to inform the baseline will be reviewed and undertaken where required, subject to access. Any additional work would be undertaken in line with that proposed in the Stage 3 PEI..."*

**Table 6.3** at page 156 & 7 is noted

**Landscape and visual impact assessment** – KcC PC note the EDF Energy narrative

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Amenity and recreation** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Noise & vibration** – KcC PC note the EDF Energy narrative



**Traffic and transport** – KcC PC note that *“During construction of the Pretty Road non-motorised user bridge and the connection to the Theberton bypass (from the west side), Pretty Road would be closed west of the Theberton Hall access and all users would be diverted via Moat Road and/or Hawthorn Road.”*

KcC PC draw EDF Energy's attention to the severe constraints of Hawthorn Road and Moat Road, that in the view of KcC PC, make them totally unsuitable for any two way diversionary route and not suitable for a single direction diversionary route without weight, length and/or width restrictions implemented and enforced.

6.4.9 KcC PC note that the **Stage 3 PEI** and the updated assessments summarised at **Table 6.3** assumed that the Theberton bypass was permanent.

KcC PC note that if the Theberton bypass were agreed to be a temporary, the road and associated infrastructure would be removed and reinstated following the construction of Sizewell C.

#### **ISSUE 58 – THEBERTON BYPASS REMOVAL AND REINSTATEMENT**

KcC PC note the reinstatement works may need up to a year of work before completion.

KcC PC believe that as this effectively reflects another facet of the 'full life cost' linked to EDF Energy imposing a requirement on the Coastal Suffolk area, that it would otherwise not want, it should be considered at the point any ADCO is made.

Likewise, KcC PC would expect that EDF Energy, under these circumstances should also be entirely responsible for the upkeep, renewal and replacement of the Theberton road-surface, road-bed and ancillary components, for the duration of its existence.

KcC PC note that in this case, there may be benefits to the Theberton community beyond the construction phase. Consequently, KcC PC believe the views of Theberton residents, businesses and farmers should be fully considered and provide the 'thought leadership'.

In the absence of consensus, KcC PC are minded to seek the reinstatement of the land, with the same caveat that the 'full life cost' (and all that it entails) should be visible at the point any ADCO is made.

For the avoidance of doubt this includes the requirement for EDF to maintain, repair and renew as required throughout the bypass's operational life and pay for the reinstatement to the standards pertaining prior to its construction. To achieve this, KcC PC believe it is essential that a comprehensive independent survey and audit of the red line boundary covering all the EIA categories should be made prior to any work being initiated.

#### **6.5 Two village bypass**

##### **a) Description of the change**

6.5.1 KcC PC note the route for the two village bypass remains largely unchanged. However, EDF Energy are introducing additional amendments at Stage 4, some of which are significant changes, with potentially significant impacts. These changes are summarised at **Figure 6.8**.

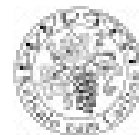
##### **b) Why these changes are necessary**

6.5.2 KcC PC note the change from a three arm to a four arm roundabout at the western end of the bypass with an accompanying increase in 'land take'.

6.5.3 KcC PC note the Tinker Brook changes and the issues of the national cycle route, Stratford Plantation and farm traffic requirements. However, KcC PC also note another significant 'land take' increase.

6.5.4 KcC PC note the narrative vis a vis the Farnham Hall track.

6.5.5 KcC PC similarly note the narrative regarding the bridge proposal at the Farnham Hall Track.



- 6.5.6 KcC PC similarly note the narrative regarding the height of the bridge proposed at the Farnham Hall Track.
- 6.5.7 KcC PC again note the increased 'land take' bring proposed at the A12 to accommodate the more fully described roundabout design and revised drainage arrangements arising from the Stage 3 consultation.
- 6.5.8 KcC PC note EDF Energy's narrative regarding their consideration of an alternate routing put forward by the two Parish Councils in the Stage 3 responses.
- 6.5.9 KcC PC note that EDF Energy *"...do not consider the alternative route to represent a better option..."*.
- 6.5.10 KcC PC note the EDF Energy portrayal of the benefits of their proposed scheme, noting EDF Energy believe their route to be *"...attractive to the road user..."* and *"...would not deter drivers from using it..."*.
- 6.5.11 KcC PC note the continued narrative of EDF Energy regarding their proposal, compared to that of the Parish Councils.

### **c) Preliminary Environmental Information**

- 6.5.12 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of **Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the **PEI at Stage 3**.
- 6.5.13 KcC PC note that **Volume 2B, Chapter 7** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.4**.
- 6.5.14 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the two village bypass as set out in the Stage 3 PEI...remain valid."*

In addition, KcC PC note that capacity assessments for both roundabouts and a Stage 1 Road Safety Audit are still to be completed, as is the fluvial modelling.

Further they go on to say that *"...The need for further survey work to inform the baseline will be reviewed and undertaken where required, subject to access. Additional noise modelling will be undertaken to determine the extent of the effects and mitigation required..."*. Any additional work would be undertaken in line with that proposed in the **Stage 3 PEI...**

**Table 6.4** at page 160 is noted

**Landscape and visual impact assessment** – KcC PC note the EDF Energy narrative

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Amenity and recreation** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Noise & vibration** – KcC PC note the EDF Energy narrative

**Traffic and transport** – KcC PC note the EDF Energy narrative

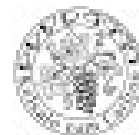
## **6.6 Northern park and ride (Darsham)**

### **a) Description of the change**

- 6.6.1 KcC PC note the proposed **increase in the diameter of the A12 roundabout from Stage 3**
- 6.6.2 KcC PC note the increased 'land take' and the red line boundary extension arising from this change, as shown at **Figure 6.9**.

### **b) Why these changes are necessary**





- 6.6.3 KcC PC are concerned that no real explanation of the underpinning change (i.e. the increase in the diameter of the roundabout) is even attempted. KcC PC regard this as a deficiency replicated throughout the **Stage 4** consultation and can only assume EDF Energy's evasion is deliberate.
- 6.6.4 KcC PC regard the use of "*The minor reductions and extensions proposed to the boundary are to align more accurately with land ownership boundaries.*" as overused in the EDF Energy narrative and potentially misleading.

**c) Preliminary Environmental Information**

- 6.6.5 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of **Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the **PEI at Stage 3**.
- 6.6.6 KcC PC note that **Volume 2B, Chapter 8** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.5**.
- 6.6.7 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying "*Proposals for further work to complete the environmental assessment of the two village bypass as set out in the Stage 3 PEI...remain valid.*"

In addition, KcC PC note that capacity assessments for the roundabout, junction with the A12 and a Stage 1 Road Safety Audit are still to be completed.

**Table 6.5** at page 163 is noted

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**6.7 Southern park and ride (Wickham Market)**

**a) Description of the change**

**i. Scheme change**

- 6.7.1 KcC PC note in the narrative that EDF Energy refer to "*very minor changes to the red line boundary...(both reductions and extensions) as shown at Figure 6.10.*" However, KcC PC could not find any green area on **Figure 6.10** until it deployed the map magnifier (x20). Once again KcC PC are required to ask why EDF Energy cannot produce easily readable maps and photographs with appropriate scale being utilised?
- 6.7.2 KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.10**. KcC PC also believe that the inclusion of a roundabout in the red line boundary extension barely qualifies as a minor change and wonder why language is used so loosely by EDF Energy...is this a strategy to deter good quality consultation and confuse contributors?
- 6.7.3 KcC PC are confused at the narrative in this paragraph. Has the further extension been made or not? If not, why is it mentioned? If it has been made, why is the narrative so ambiguous?

**ii. Wickham Market traffic migration**

- 6.7.4 KcC PC note the two potential migration proposals put forward by EDF Energy at **Stage 3**.
- 6.7.5 KcC PC note EDF Energy are "*...now also considering an alternative approach to work with the Parish Council to bring forward a public realm improvement scheme...*".

**b) Why is this change necessary**

- 6.7.6 KcC PC note that once again EDF Energy are using the "*...align more accurately...ownership boundaries...*" 'flag of convenience' to explain continuing modifications to boundaries. We can only hope that a different 'rule' is used in reactor design!



6.7.7 KcC PC note (with a degree of scepticism) the inclusion of the B1078/B1116 roundabout in pursuit of walking and cycling improvements if *"...the results of our ongoing detailed design work show that this is necessary."*

6.7.8 KcC PC note the narrative

**c) Preliminary Environmental Information**

6.7.9 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as **part of Stage 4** has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the PEI at Stage 3.

6.7.10 KcC PC note that **Volume 2B, Chapter 9** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.6**.

6.7.11 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the southern park and ride as set out in the Stage 3 PEI...remain valid."*

In addition, KcC PC note that a capacity assessment of the junction and a Stage 1 Road Safety Audit are still to be completed.

**Table 6.6** at pages 165 & 166 is noted

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Amenity and recreation** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**6.8 Freight Management Facility**

**a) Seven Hills**

**i. Description of the change**

6.8.1 KcC PC note the EDF Energy narrative

**ii. Why is this change necessary**

6.8.2 KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.11**. KcC PC also note that part of this expansion is *"...if our further analysis shows us that this is necessary."* and wonder why at Stage 4 of the consultation, this uncertainty remains.

KcC PC also note the reduction to the northern margin to remove a drainage feature from the scheme.

6.8.3 KcC PC note the reduction to the northern margin to remove a drainage feature from the scheme.

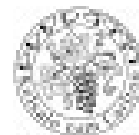
6.8.4 KcC PC note that once again EDF Energy are using the *"...align more accurately...ownership boundaries..."* 'flag of convenience' to explain continuing modifications to boundaries.

**iii. Preliminary Environmental Information**

6.8.5 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of Stage 4 has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the PEI at Stage 3.

6.8.6 KcC PC note that **Volume 2B, Chapter 10** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.7**.

6.8.7 KcC PC note a summary of the effects associated with the change in traffic on the road network as a result of the integrated freight strategy is at **Chapter 3** of the **Stage 4** consultation.



Having referred to the aforesaid **Chapter 3** KcC PC conclude that it is not a summary, more a perfunctory piece of 'cut and paste'.

- 6.8.8 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the Seven Hills freight management facility as set out in the **Stage 3 PEI**...remain valid."*

In addition, KcC PC note that a capacity assessment of the site access junction and a Stage 1 Road Safety Audit are still to be completed.

**Table 6.7** at pages 167 & 168 is noted

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Geology and land quality** – KcC PC note the EDF Energy narrative

**Traffic and transport** – KcC PC note the EDF Energy narrative

#### **b) Innocence Farm**

##### **i. Description of the change**

- 6.8.9 KcC PC note the EDF Energy narrative

- 6.8.10 KcC PC note the EDF Energy narrative

##### **ii. Why is this change necessary**

- 6.8.11 KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.12**. KcC PC also note that part of this expansion is usefully described as *"...to accommodate any potential works."* and wonder why at Stage 4 of the consultation, this uncertainty remains.

- 6.8.12 KcC PC note the narrative.

##### **iii. Preliminary Environmental Information**

- 6.8.13 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of Stage 4 has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the PEI at Stage 3.

- 6.8.14 KcC PC note that **Volume 2B, Chapter 10** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.8**

- 6.8.15 KcC PC note a summary of the effects associated with the change in traffic on the road network as a result of the integrated freight strategy is at **Chapter 3** of the **Stage 4** consultation.

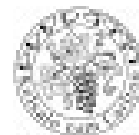
Having referred to the aforesaid **Chapter 3** KcC PC conclude that it is not a summary, more a perfunctory piece of 'cut and paste'.

- 6.8.16 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the Innocence Farm freight management facility as set out in the **Stage 3 PEI**...remain valid."*

In addition, KcC PC note that a capacity assessment of the site access junction and a Stage 1 Road Safety Audit are still to be completed.

**Table 6.8** at pages 169

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative



**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Traffic and transport** – KcC PC note the intention to send all exiting traffic to Junction 60 before circulating to proceed west back along the A14 and onto the A12 at Junction 58.

KcC PC are concerned that unless all journeys are monitored this could be short cut by the less compliant drivers.

KcC PC are also concerned at the increased pollution arising from this change in policy and are looking to understand what 'pollution offset measures' are being taken by EDF Energy to mitigate the adverse impacts.

## **6.9 Yoxford Roundabout**

### **a) Description of the change**

6.9.1 KcC PC note the EDF Energy intention to move the roundabout 20 m to the South East as at **Figure 6.13**

6.9.2 KcC PC also note the proposal for a small revision to the south of the site.

### **b) Why is this change necessary**

6.9.3 KcC PC note that this proposal is to meet highways design requirements, it will also enable off-line construction thereby reducing traffic management delays.

KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.13**.

6.9.4 KcC PC also note the amendment to the southern edge of the red line boundary, where the 'land take' is being reduced to provide for a colony of the Sandy Stiltball fungus.

### **c) Preliminary Environmental Information**

6.9.5 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes presented as part of Stage 4 has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the PEI at Stage 3.

6.9.6 KcC PC note that **Volume 2B, Chapter 11** of the **Stage 3 Main Consultation Document** has been updated as described in **Table 6.9**

6.9.7 KcC PC note a summary of the effects associated with the change in traffic on the road network as a result of the integrated freight strategy is at **Chapter 3** of the **Stage 4** consultation.

Having referred to the aforesaid **Chapter 3** KcC PC conclude that it is not a summary, more a perfunctory piece of 'cut and paste'.

6.9.8 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying *"Proposals for further work to complete the environmental assessment of the Yoxford roundabout as set out in the Stage 3 PEI...remain valid."*

In addition, KcC PC note that a capacity assessment of the junction and a Stage 1 Road Safety Audit are still to be completed.

**Table 6.9** at page 171 is noted

**Landscape and visual** – KcC PC note the EDF Energy narrative

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative

**Amenity and recreation** – KcC PC note the EDF Energy narrative

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative



**Traffic and transport** – KcC PC note the EDF Energy narrative

**6.10 Other highway improvements**

**a) A140/B1078 west of Coddensham**

**i. Description of the change**

6.10.1 KcC PC note the EDF Energy intention to move the red line boundary to the north and south along the A140 as identified at **Figure 6.14**

**ii. Why is this change necessary**

6.10.2 KcC PC note the proposal to extend the boundary seems to be solely for the purpose of improving signage and driver advice

**b) A12/A144 south of Bramfield**

**i. Description of change**

6.10.3 KcC PC note the proposal for a programme of works to improve the junction as outlined at **Figure 6.15**

**ii. Why is this change necessary**

6.10.4 KcC PC note that this proposal is to reduce the impact on properties and gardens

KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.15**

**c) A12/B1119 Saxmundham**

**i. Description of change**

KcC PC note the proposal for a programme of works to improve the junction as outlined at **Figure 6.16**

**ii. Why is this change necessary**

6.10.5 KcC PC note that this proposal is to enable development work on the junction to continue in collaboration with the highway's authority.

6.10.6 KcC PC note the increased 'land take' and the red line boundary extensions arising under this change, as shown at **Figure 6.16**. EDF Energy advise the 'land take' to the west is for the provision of an advanced warning 'give way' sign.

**d) A1094/B1069 Knodishall**

**i. Description of change**

6.10.7 KcC PC note the proposal for a programme of works to improve the junction as outlined at **Figure 6.17**

**ii. Why is this change necessary**

6.10.8 KcC PC note that this proposal is to provide for speed limit signs to be incorporated at an appropriate distance from the junction.

**e) Preliminary Environmental Information**

6.10.9 KcC PC note that no PEI was undertaken at the A140/B1078 and A12/B1119 sites at Stage 3 as EDF Energy considered the proposed works to be of a scale at which no significant effects would be likely.

KcC PC are concerned that seemingly these omissions were made without EDF Energy taking any advice and consequently question what other areas have been omitted without clarification having been obtained in advance?



- 6.10.10 KcC PC note that in contrast, EDF Energy did undertake some PEI elsewhere (Wickham Market, Mill Street and the A1094/B1069 junction) and question what criteria EDF Energy used to establish the working hypothesis of a de minimis threshold?
- 6.10.11 KcC PC note that EDF Energy assert that as there was no change in the Wickham Market diversion route or the Mill Street scheme at Stage 4 and that there was only a “...*minor change...*” at the A1094/B1069, “*No revised PEI is therefore presented in Stage 4*”.

#### **ISSUE 59 - USE OF A 'DE MINIMIS'**

KcC PC are concerned that a seemingly unratified decision has been taken to create a de minimis and feel compelled to question whether this is good practice and indicative of a broader issue the conduct of the Pre-application Consultation process?

- 6.10.12 KcC PC note that EDF Energy concede the inadequacy of the **PEI at Stage 3** saying “*Proposals for further work to complete the environmental assessment of the highway improvement works as set out within the Stage 3 PEI...remain valid.*”

In addition, KcC PC note that a capacity assessment of highway junctions and a Stage 1 Road Safety Audits are still to be completed.

Considering the omissions made under **6.10.9** and the lack of any PEI for two sites, KcC PC question whether EDF Energy plan to make good this evidence deficit, and if so when results will be available for public scrutiny?

- 6.10.14 KcC PC note EDF Energy's assertion that a preliminary environmental assessment of the design changes for the A12/A144 changes presented as part of Stage 4 has been undertaken. KcC PC also note the inadequacy, incompleteness and incorrectness (in parts) of the PEI at Stage 3.

**Table 6.10** at page 177 is noted as only being applicable to the A12/A144 junction

**Terrestrial ecology and ornithology** – KcC PC note the EDF Energy narrative effectively disqualifying the site from further assessment on the basis that the previous boundary found no ecological constraints

**Terrestrial historic environment** – KcC PC note the EDF Energy narrative

**Soils and agriculture** – KcC PC note the EDF Energy narrative

**Traffic and transport** – KcC PC note the EDF Energy narrative

## **7. MITIGATING OUR DEVELOPMENT**

### **7.1 Introduction**

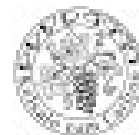
- 7.1.1 KcC PC note EDF Energy's intent to continue with development of their nuclear generation capability at Sizewell, despite recognising impacts of a protracted construction programme will be damaging and disruptive to the Coastal Suffolk area and far beyond.

KcC PC note EDF Energy assert they are “*fully committed to being a good neighbour to...communities, as well as...natural habitats around the site*”.

KcC PC wait to see whether these claims are substantiated in any ADCO that EDF Energy may make, as the Pre-application Consultation process and the ancillary activities (forums, public meetings, exhibitions, development proposals, etc.) have done little to demonstrate these values.

- 7.1.2 KcC PC note that EDF Energy rightly point out that large and complex projects do create opportunities for significant positive impacts, as well as those generally considered to be detrimental. As with the previous paragraph KcC PC wait to see what level of positive impact is portrayed in the ADCO and then, if it is approved, what is delivered.





Those residents in KcC PC that are familiar with large projects are conversant with many concepts designed to ensure that not only are projects delivered to time, cost, quality, etc., but that they also deliver the required outcomes to the stakeholder community.

#### **ISSUE 60 - BENEFITS TRACKING**

KcC PC invite EDF Energy to include an independently audited benefits tracking mechanism within the ADCO, with appropriate milestones and a commitment to making progress throughout the construction phase available to the public via a public access website, again independently monitored and audited.

KcC PC note EDF energy highlight they are *"seeking to avoid or minimise impacts in the first instance...where we cannot...put in place appropriate compensation."*

#### **ISSUE 61 - IMPACT MITIGATION MATRIX**

KcC PC invite EDF Energy to include an independently audited "impact mitigation" mechanism within the ADCO, alongside a comprehensive and categorised (Avoided, Reduced, Minimised and Compensated) list of demonstrable impacts and the accompanying mitigating actions that EDF Energy intend to deliver during the construction phase.

Similarly, to benefits (above), KcC PC invite EDF Energy to make a commitment to demonstrate their progress and delivery in these areas (throughout the construction phase), available to the public via a public access website, again independently monitored and audited.

7.1.3 KcC PC note the rehearsal by EDF Energy of their environmental credentials and how seriously they take the requirements laid upon them. KcC PC note that EDF Energy emphasise that they have recently sought a new EIA Scoping Opinion *"...to ensure that we fully take account of the Project proposals, which have evolved since 2014...our original scoping exercise...to reflect the new regulations...climate change, human health..."* .

KcC PC find it difficult to square EDF Energy's portrayal of their approach, with a current proposal that is likely to rely largely on road traffic (cars, LGV, HGV, buses, mini-buses, etc.) to transport; the workforce, up to 10.7m tonnes of materials, supplies and services to construction sites where heavy vehicles and plant will facilitate the building works necessary for Sizewell C.

Moreover, in the absence of any alternative being brought forward by EDF Energy, it seems likely that the vast majority of this will be powered and maintained using fossil fuels (petrol, diesel, etc.).

#### **ISSUE 62 - GROSS ENVIRONMENTAL IMPACTS**

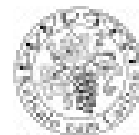
KcC PC invite EDF Energy to include a compendium of the gross environmental impacts that the construction of Sizewell C will incur within the ADCO alongside a breakdown of the individual components contributing to the total (i.e. xxx million miles delivering aggregate from yyy to Sizewell Main Development by diesel HGV, including the 'return empty' journeys, etc.)

7.1.4 KcC PC note EDF Energy's intention to finalise their EIA after completion of the Stage 4 consultation and to develop the ES that will accompany any ADCO.

KcC PC also note that EDF Energy will be including *"direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long term, permanent and temporary, positive and negative effects of the development and identify those measures necessary to control impacts."* within the EIA/ES.

#### **ISSUE 63 - EIA/ES METHODS AND ACCREDITATION COMPENDIUM**

KcC PC invite EDF Energy to include a methodology compendium within the EIA/ES, demonstrating not just the effect/impact/mitigation, but also the calculation methods and accreditations for each.



7.1.5 KcC PC note that the EDF Energy ADCO will also explain how the Project has evolved, how the proposals respond to the policy context and the rationale for the proposals in the ADCO.

## **7.2 How would we control impacts**

7.2.1 KcC PC note EDF Energy's intention is to *"avoid significant harm, including through mitigation and consideration of reasonable alternatives"* and assume that use of the term 'significant' is aligned with its meaning when being used in the context of the EIA, rather than the simpler dictionary definition as; **"Significant: Adjective - sufficiently great or important to be worthy of attention; noteworthy."**

KcC PC also note that in the Pre-application Consultations, the term 'avoid' or 'avoidance' is seldom seen in connection with impacts or effects.

### **ISSUE 64 - SIZEWELL C IMPACT AVOIDANCE CATALOGUE**

KcC PC invite EDF Energy to include a compilation (in the ADCO) of identified impacts and/or effects in the Stage 3 and Stage 4 consultations (with the appropriate paragraph reference) that have been documented and agreed as having been avoided.

7.2.2 KcC PC note EDF Energy's assertion that *"We are embedding best practice mitigation...from the outset. The construction sector has developed ways of managing negative impacts through a Code of Construction Practice...and we are working to identify specific measures for a Sizewell C Code of Construction Practice...builds on lessons...from Hinkley Point C and best practice from other large infrastructure projects...responding to the unique location of Sizewell C."*

KcC PC are pleased to note that EDF Energy accept that the Sizewell C location is 'unique', conferring it with a status like no other. Consequently, KcC PC believe that EDF Energy should be exercising extreme care in developing their proposals, in order that the location is not compromised through expediency or ignorance.

### **ISSUE 65 - WATER**

In this connection, KcC PC are gravely concerned that the current proposals jeopardise the short, medium and long term viability of safe and secure water supplies in the Coastal Suffolk area. KcC PC are aware that Anglian Water has already had to take immediate and effective action in conjunction with a commercial enterprise (in north Essex) to safeguard water supplies to residents in the immediate area.

KcC PC invite EDF Energy to bring forward a gross demand forecast for the water required in the construction of Sizewell C. The forecast to be based on the Project's monthly demand over the 12 year construction period, including the main development construction works, workforce demand and off-site construction developments.

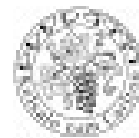
The forecast should be included in the ADCO along with confirmation from the appropriate supplier(s) that sufficient supplies are available to meet the forecast without detriment to Coastal Suffolk residents, businesses, farmers and visitors.

7.2.3 KcC PC note that EDF Energy are continuing to develop proposals with embedded mitigations.

### **ISSUE 66 - HEDGEROWS**

In that connection, KcC PC are concerned that throughout the Stage 3 and Stage 4 consultations hedgerows barely get any recognition for the role that they play in supporting a myriad of species that are making a significant contribution to the ecology of the area.

In their Summer 2019 publication "Countryside Voice" the CPRE highlighted the importance of strong hedgerows, illustrating how unscrupulous developers were deliberately limiting access to them prior to seeking planning permission.



## **ISSUE 66 - HEDGEROWS CONTINUES**

The article also notes that the Independent Committee on Climate Change has recommended a 40% extension of the current network of hedgerows to help tackle global warming. The CPRE have argued that an increase in hedge and tree planting would not only help with carbon capture and mitigate the impacts of climate change by alleviating floods, but also create vital habitats for wildlife and improve air quality.

KcC PC invite EDF Energy to recognise the detrimental impact the construction of Sizewell C will have in the short, medium and long term and not only restore areas like the Sizewell link road (should it get DCO approval), but also to initiate a Coastal Suffolk wide programme to improve and increase hedge and tree planting. The programme to operate over the full lifetime of Sizewell C (construction, operation and decommissioning) and set challenging targets for the supply and planting of hedge and tree species.

7.2.4 KcC PC note that EDF Energy are employing *"...specialist independent consultants..."* to complete the EIA on their behalf and hope that this does not give rise to an EIA written to appease, rather than objectively identifying and addressing the real issues of constructing a nuclear power-station in what EDF Energy already concede is a *"...unique location."*

## **ISSUE 67 - COMPREHENSIVE TRAFFIC PLAN**

In that connection KcC PC invite EDF Energy to bring forward a comprehensive traffic management plan, not evident at the Stage 3 or Stage 4 consultations.

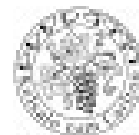
One that seeks to avoid self-routing into the roads and lanes surrounding the A12, that brings forward controls that safeguard the network of single track lanes in and around villages throughout Coastal Suffolk and that maintains the safe use of the corridor west of the A12 through to the Sizewell main development; by walkers, horse riders, cyclists, horse pulled vehicles, dog walkers and other recreational users visiting Coastal Suffolk.

7.2.5 KcC PC note that EDF Energy intend to pursue a policy of compensatory provisions where mitigation does not achieve a satisfactory solution. KcC PC wish to remind EDF Energy that the principal focus of any mitigation plan should be to:

- i] Avoid – avoidance should be the primary tool used to reduce potential impacts, it requires imagination, creativity and embedding in the culture of the body corporate. It is not easy, but worthwhile.
- ii] Minimisation – the ability to pro-actively mitigate the majority of an impact should run in the lifeblood of an enterprise, it should be a core value and be the responsibility of everybody engaged in the work. Minimisation can often achieve a position of compromise agreeable to all.
- iii] Attrition – improvement by attrition is generally a slow and relatively unrewarding process of mitigating impacts. Cumulative costs are often greater than more radical approaches and the solution that is arrived at, is more often than not a suboptimal and unsatisfactory to one or both parties.
- iv] Compensation – compensatory arrangements should be regarded as failure and only used where innovation, imagination and all other practical options have been exhausted. Each compensatory solution should be reviewed objectively and become an integral part of an organisations 'learning' ethos.

## **7.3 Project benefits**

7.3.1 KcC PC note EDF Energy's assertion that the *"...impacts of the Project overall will be overwhelmingly positive."* and will include: educational and business opportunities, employment opportunities, apprenticeships, apprentice schemes linking the south-west and the east, a 40% female workforce and £100m a year (£274,000 per day) entering the regional economy whilst under construction and £40m (£110,000 per day) during operation.



7.3.2 KcC PC note EDF Energy's work with the Suffolk Chamber of Commerce and other stakeholders to understand what opportunities may be available to local businesses.

7.3.3 KcC PC note EDF Energy will be promoting Hinkley Point C job vacancies in East Anglia and providing for the transition of the Hinkley Point C workforce to Sizewell C.

KcC PC also note EDF Energy will work with local schools and colleges to assist in engaging young people in Science, Technology and Maths.

KcC PC welcome these initiatives and others at 7.3.3, but note that targets are largely absent (i.e. what does success look like, both for Suffolk and EDF Energy?)

#### **7.4 Delivering our commitments and obligations**

7.4.1 KcC PC note EDF Energy assertion regarding the embedding of environmental processes and refer EDF Energy to KcC PC's comments in the preceding paragraphs.

7.4.2 KcC PC note the first paragraph, but find the wording confused and ambiguous.

KcC PC note the second paragraph but are unclear about the inferred linkage between; workforce, environmental assessments, mitigations and compensatory action.

KcC PC assume that EDF have deliberately conflated these issues but remain unconvinced vis a vis the appropriateness and efficacy.

7.4.3 KcC PC note the narrative regarding a Schedule of Mitigation within the ADCO

7.4.4 KcC PC note the narrative in respect to an Examining Authority and in particular the role of stakeholders. KcC PC note "...many [but presumably not all?] of the measures will be secured through a DCO and associated legal agreement."

#### **7.5 Compensation**

##### **a) Community Fund**

7.5.1 KcC PC note the EDF Energy narrative regarding its existing contribution to local communities.

7.5.2 KcC PC note that the Community Fund has been instigated to "...ensure that any intangible residual effects of the Project can be managed effectively." and recognises "...the potential for residual impacts on local communities as a result of combined environmental effects, both perceived and real..."

#### **ISSUE 68 - MENTAL HEALTH, ASTHMA AND REAL VERSUS PERCEIVED EFFECTS**

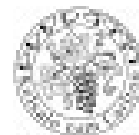
KcC PC are interested in the inference that environmental effects can be 'perceived' as well as real, and ask EDF Energy to evidence this assertion, distinguishing it from impacts that do have very real mental health impacts on vulnerable groups.

For example, strong evidence gathered by Asthma UK suggests "...that air pollution is linked to the development of asthma..." and that "...high spells of air pollution create peaks in GP visits and hospitalisations."

The research also demonstrates that both "...adults and children with asthma feel at greater risk of a potentially life threatening asthma attack during times of high pollution."

KcC PC note that the UK is failing to meet its current targets limiting air pollution, "...meaning many pollutants that can affect asthma, such as nitrogen dioxide, sulphur dioxide and particulates from traffic fumes put asthma sufferers at risk."

KcC PC invite EDF Energy to clarify their assertion and describe how their dependence on HGV road traffic for the construction of Sizewell C will be mitigated to avoid the risks described by Asthma UK above?



- 7.5.3 KcC PC note EDF Energy's intention to describe the guiding principles of the Community Fund and where and on what the fund should be spent, as well as the amount to be allocated to the fund during each year of construction in their ADCO.

#### **ISSUE 69 - COMMUNITY FUND**

Having noted that the purpose is to "...ensure that any intangible residual effects of the Project can be managed effectively..." is it reasonable to place annual limits on the spend of the fund? Surely if an incipient and widespread residual impact is identified and could be effectively mitigated, an artificial cap would be unhelpful?

##### **b) Property Support**

- 7.5.4 KcC PC note EDF Energy's comments regarding homeowners who are affected by Sizewell C and associated construction works but note the absence of anything of substance.

- 7.5.5 KcC PC note the further comments of EDF Energy and conclude that the 'Property Support' referred to is no more explicit than referencing the existing legal protections and Statutory Blight Claims.

However, it does note that (without clarity on any commitment), EDF Energy have and will be in discussion with 'a number' of householders during 2019.

KcC PC is sceptical about the sincerity of EDF Energy with regard to householder protections beyond those enshrined in law and has seen no evidence of meaningful discussions taking place.

#### **ISSUE 70 - PROPERTY SUPPORT**

KcC PC invite EDF Energy to further clarify their position and bring forward evidence of their commitment to dealing with impacted householders in a timely and fair way.

##### **7.6 Next Steps**

- 7.6.1 KcC PC note that at Stage 4 EDF Energy are "...continuing to develop its mitigation proposals for the Project in relation to: natural environment (i.e. landscape/ecology); COASTAL processes; heritage(i.e. archaeology); transport (including PRoW); tourism; housing; health; leisure; skills, education and training; resourcing; property support and a community fund."
- 7.6.2 KcC PC note that EDF Energy concede that "...there may be cumulative negative impacts on some parts of the environment depending on the location and extent of clustering of new energy and other infrastructure projects." and note "These impacts are being assessed in the context of the Sizewell C Project."

#### **ISSUE 71 - AMBIGUITY AND CLARITY**

KcC PC note the opportunity for ambiguity and/or interpretation be brought to bear on the latter sentence and call upon EDF Energy to be explicit in respect to their meaning and more expansive with the scope, insofar as negative impacts are believed to extend beyond just "...some parts of the environment..."

**RESPONSE ENDS**