



Kelsale cum Carlton Parish Council

26th January 2017

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1. Introduction

The following document provides the formal response of Kelsale cum Carlton Parish Council (KcCPC) to the emerging proposals for a new nuclear power station, Sizewell C (SZC), made by EDF Energy and contained in the published documents comprising the Stage 2 Pre-Application Consultation (Autumn/Winter 2016). It may also make reference to issues arising from the Stage 1 Pre-Application Consultation process as and when required.

In making this response, KcCPC does not make comment on the fundamental process by which decisions are made in respect to a Nationally Significant Infrastructure Project as described in the Planning Act 2008.

KcCPC makes this response within the permitted timescales.

However, KcCPC wish to make it clear that as a consequence of the relatively short consultation period (72 Calendar days of which just 49 were working days) and a combination of:

- limited access to suitably qualified resource
- no SZC Critical Path Analysis, Key Milestone Plans, Outline Programme and Workstream Project Plans

it has not been possible for KcCPC to assimilate a complete picture of the detailed phasing of the Programme components, their potential macro and micro impacts, contingent actions or unforeseen consequences, both planned and encompassed by the consultation.

2. Overview

KcCPC recognise that other respondents to the consultation will have many and varied concerns, many of which may lay outside of the specific remit of KcCPC and beyond its ability to make informed comment.

For that reason this document principally limits itself to macro and micro issues that may have an impact on the Kelsale cum Carlton (KcC), residents, self-employed, businesses, employers and employees, as well as service providers to the former, visitors, holidaymakers, tourists, users of the Village Hall, families with children attending education in KcC and those individuals attending worship in the Parish.

Consequently, six key areas are identified by KcCPC as of greatest concern and can be summarised as:

2.1 Road Traffic Movements (RTM)

The minimisation of all road traffic movements directly and indirectly concerned with the construction and operation of SZC **and through collaborative working** long term resolutions to the future combined traffic movements involved with the operation of Sizewell B, the decommissioning of Sizewell A and any future decommissioning activity of Sizewell B. Thus ensuring that the level of amenity offered by the East Coast road network remains viable for the stress free conduct of everyday travel by the residents and businesses of KcC.

2.2 Non-Road Traffic Movement (NTM)

Ensuring that the level of amenity offered by the Ipswich-Lowestoft railway line is not diminished further and remains viable for the stress free conduct of everyday travel by residents of KcC.

2.3 Accommodation (ACC)

Safeguarding the residents and the communities comprising KcC from further diminution in affordable housing stock to second, holiday and multiple occupancy housing. Simultaneously, maximising the opportunity for willing KcC residents and businesses to make available a variety of accommodation options for the housing of people employed in the construction and operation of SZC.

2.4 Contingency & Unforeseen Consequences (CUC)

Ensuring that viable contingent actions are designed, planned and in place to safeguard those identified above, wildlife, the environment and infrastructure against unplanned events and unforeseen circumstances arising from the intensity of use of the area during the proposed construction period and the subsequent operation. Thus ensuring that the level of amenity to KcC residents and Businesses offered by utilities, public services, statutory bodies, private businesses, the road and rail networks remain viable during periods where ‘normal operations’ by SZC are not possible and supportive of the everyday life of those people.

2.5 Emergency Planning (EP)

To ensure through close interworking with SZC and the other Public Sector Agencies that both during construction and operation of SZC that KcCPC Emergency Planning is maintained in a state of readiness and integrated with EDF Energy.

2.6 Employment & Supply Chain (E&SC)

Working co-operatively with EDF Energy and its agents to optimize the short, medium and long term employment opportunities of KcC residents

The following sections of this document develop each of these themes in turn and outline any specific, background thinking, issues, concerns, opportunities, suggested resolutions and any additional information pertinent to the KcCPC thinking.

3. Road Traffic Movements (RTM)

3.1 Kelsale cum Carlton Parish Overview

KcC comprises a combined Parish of two village entities (Kelsale & Carlton) and three historic Greens (Curlew, North & East) bisected by the A12, with the bulk of residents living to the east of it. Additionally, it has the northern tail of the historic A12 route, providing many Saxmundham residents and light business traffic with a primary route to and from the A12.

The Kelsale cum Carlton Parish comprises, circa 450 households, many listed buildings, a small light industrial estate, a primary school, a number of places of worship, a listed Village Hall, a Social Club, Public house, several large farms and a number of smaller farms and agricultural businesses, based on a substantial agricultural land area surrounding the village centre, which is currently under consultation for designation as a Conservation Area.

KcC immediately neighbours, Theberton to the East, Middleton & Yoxford to the North, Saxmundham to the South, Rendham to the West, along with close neighbours Knodishall, Leiston & Sternfield across agricultural fields.

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

It should be noted that the network of lanes comprising the greater KcC area are regularly used by, horse riders, runners, walkers, dog walkers, cyclists, game shoots and agricultural vehicles – small and large, they are often hedged to both sides (some sunken), are largely unpaved, have soft verges & deep run-off gullies and are often subject to field run-off in wet weather. In addition they are home to designated and protected Roadside Nature Reserves complimenting the large Simpson's Fromus Valley nature reserve adjacent to the A12 and another private smaller nature reserve in Tiggins Lane.

3.2 Kelsale cum Carlton and existing Sizewell Traffic

The geography of KcC means that in the main, KcC residents are housed within or immediately adjacent to a triangle formed by, the A12 to the West, the B1122 to the North thro' to the East and Clayhills Road as the southern border adjacent to Saxmundham.

Although relatively small in comparison to the SZC proposals, Kelsale is already impacted by both the operational car, motorbike and light goods vehicle traffic for Sizewell B and also the decommissioning activity at Sizewell A.

A 2015 traffic audit (conducted for KcCPC through Suffolk Constabulary) on Carlton Road identified significant through traffic from the A12 using this 'rat run' morning and evening, broadly in line with working patterns of Sizewell B and the decommissioning work.

Moreover, much of this traffic was identified as exceeding the speed limit despite, 'School Speed Limit' signage for Kelsale Primary School at the eastern end and motorists encountering increasing overnight street parking, the further away from the westerly A12 entry it went.

Additionally, some KcC roads (Clayhills Road, Bridge Street, Lowes Hill, Butchers Lane) are regularly used by small numbers of Sizewell workers to join Theberton Airfield Road & Harrow Lane before passing Cakes & Ale on Abbey Lane and thence onto Lovers Lane opposite, across the B1122.

As a consequence KcCPC is concerned with proposals contained in the SZC Stage 2 Pre-Application Consultation.

Specifically, the KcCPC concerns are centred on six unresolved topics

- a] **Safety and A12 accessibility for KcC residential and interest group vehicular traffic?**
To what degree will the amenity offered to residents, businesses and other interest groups in Kelsale, afforded by the North and South A12 routes, be diminished by these proposals?
- b] **Safe Access to amenity & enjoyment afforded by other communities in the locality?**
To what degree will the amenity and enjoyment afforded by close-by towns, villages, attractions and open spaces available to residents, businesses and other interest groups in Kelsale be diminished by ease of access to and congestion on the North and South A12 routes and B1122?

c] **Effective policies to support minimum “...adverse transport effects...on...local communities”?**
KcCPC cannot reconcile the apparent commitment of SZC to “...*deliver the Sizewell C Project (the Project) so that adverse transport effects on the environment and local communities are limited through mitigation...*” whilst the following positions are promoted within the SZC Stage 2 Pre-Application Consultation

i) **Southern Park & Ride**

The Consultation document seems to indicate that the Southern Park & Ride will not be functional for the full term of the project, considerably reducing its effectiveness in minimising the impacts of reduced traffic levels on the communities during the run-up and run-down from peak loading.

KcCPC Assertion – *a fully functional Southern Park & Ride capability is a pre-requisite and should be completed prior to any work progressing on the main development site and the Campus. It should also be maintained in an operational state for the entirety of the operational and decommissioning phases of SZC (See iii below).*

ii) **Northern Park & Ride**

The Consultation document seems to indicate that the Northern Park & Ride will not be functional for the full term of the project, considerably reducing its effectiveness in minimizing the impacts of reduced traffic levels on the communities during the run-up and run-down from peak loading.

KcCPC Assertion – *a fully functional Northern Park & Ride capability is a pre-requisite and should be completed prior to any work progressing on the main development site and the Campus. It should also be maintained in an operational state for the entirety of the operational and decommissioning phases of SZC (See iii below).*

iii) **SZC Main Development Site**

The inclusion of a (seemingly early deliverable) 1,200 space Car Park in the main development site seems contrary to the professed approach to the SZC Development Phase (above) and may also indicate an unwillingness by SZC to extend that thinking into the Operations Phase.

KcCPC Assertion – *a fully functional Park & Ride capability is a pre-requisite for both the development of SZC, its operation and decommissioning. In order to sustain a focus on reducing adverse transport effects on the environment and communities and ensure focus on this key undertaking, Permit Parking on the Operational Sizewell C site should be rigorously limited to no more than 150 spaces with a car sharing minimum of no less than 2.5 per vehicle, per journey - as required by some commercial enterprises in London and the South East (L&G at their Kingswood & Hove sites, various BT sites in the UK, etc.). To facilitate this it is suggested that the Park & Ride Shuttle be retained and reviewed in line with demand to meet shift patterns for both operations, outages and decommissioning. To mitigate any impacts on local resident workers it is suggested local village & town electric bike pools (‘Boris Bikes’) with the necessary charging points be investigated for all Phases of SZC, alongside regular SZC bus services (as per Bernard Matthews elsewhere in Suffolk & Norfolk).*

iv) SZC Campus

The inclusion of a (seemingly early deliverable) 1,500 space Car Park in the Campus development site seems contrary to the professed approach to the SZC Development Phase (above).

KcCPC Assertion – *a fully functional Park & Ride capability is a pre-requisite for both the development of SZC, its operation and decommissioning. In order to sustain a focus on reducing adverse transport effects on the environment and communities and ensure focus on this key undertaking, Permit Parking on the Campus site should be rigorously limited to no more than 150 spaces with a car sharing minimum of no less than 2.5 per vehicle, per journey, - as required by some commercial enterprises in London and the South East. To facilitate this it is suggested that the Park & Ride Shuttle be reviewed to incorporate luggage capability (i.e. Airport style buses with easy access for passengers and luggage.*

d] A12 and B1122 route viability, utilisation and resilience?

What Due Diligence has been, or is yet to be undertaken, to establish that the fabric of the A12 and B1122 is in sufficiently robust health to sustain the volume and weight of the forecast traffic levels of varying types during the construction and operation of SZC?

What are the “...other routes...” to be utilized by B1122 traffic (including SZC traffic) in the event of incident or accident preventing use of the A12/B1122 route or part thereof?

Are the identified secondary routes suitable for sustained use by the forecast traffic volumes in the event of a more significant closure of the A12/B1122 route or part thereof? For example a Fatal Road Traffic Incident requiring road closure of a day or two rather than hours or Carriageway Damage (i.e. fire damage to the surface or a sink hole opening up) where a longer closure may be necessary, perhaps extending into weeks or months.

What arrangements have been, or need to be, agreed to provide for Scheduled Maintenance Windows enabling regular minor and/or substantive road maintenance to be undertaken? How are Scheduled Maintenance Windows to be managed in respect to reconciling SZC traffic flows and the continued peaceful enjoyment by residents of their homes, communities and neighbourhoods?

What agreements or conventions have been, or need to be, agreed and adopted to effectively manage any emergency and/or ad hoc Maintenance Windows to be invoked? What command and control mechanisms will be used and what communication protocol will be in place for informing directly and indirectly impacted communities?

Given the current width of the B1122, in the event of a closure, how is it visualized the safe ‘turn back’ of HGV and PSV traffic will be facilitated?

What measures are considered within the traffic plan to avoid all of the single track lanes off of the A12 and B1122 becoming clogged with ‘turn back’ traffic in the event of closure?

Moreover, what steps will be in place to avoid careless and reckless use of single track lanes, weight limited bridges, etc. by ‘blind’ satellite navigation drivers of HGV & PSV traffic?

KcCPC concern made manifest in 2016 – a recent diversion of traffic onto KcC's Lowes Hill resulting from of a temporary closure of Clayhills Road (for tree surgery) led to all traffic including HGVs being routed (by simplistic diversion signage) down the single track lane with a bridge over the Ipswich/Lowestoft railway line capable of just 7.5T MGW.

The result was at least two observed breaches of that limit, two further HGV vehicles reversing to a safe turning point, a distance of nearly 1km. Congestion and the delay of farm vehicles and cars from KcC proceeding east toward Leiston.

e] Air Quality

KcCPC is concerned at the paucity of usable air quality data contained in the SZC Stage 2 Pre-Application Consultation Documents in respect of the impact both on the A12 and B1122 route, and also the propagation of pollution that extends laterally from the immediacy of the route. KcCPC seeks urgent resolution of this omission and an early meeting with SZC to understand the potentially damaging and detrimental impacts on Kelsale, its residents, schoolchildren, businesses, flora, fauna & environment

f] Access and egress onto the A12

KcCPC is concerned about traffic leaving Kelsale cum Carlton and seeking to:

- go in a Northerly direction from the B1121 Main Road beyond Curlew Green
- go in a Northerly direction from Carlton Road
- go in a Southerly direction from the road opposite Carlton Road across the A12

And traffic destined for Kelsale cum Carlton:

- approaching from the South and turning into Carlton Road
- approaching from the South and turning into the B1121 Main beyond Curlew Green
- approaching from the North and turning into the road opposite Carlton Road across the A12

requiring drivers to cross a much increased processional traffic flow comprising largely of HGVs.

In particular, it is concerned that visibility of both routes will not be adequate for judging the safe crossing of the traffic flows as the junctions are currently designed.

4. Non-Road Traffic Movements (NTM)

4.1 Kelsale cum Carlton Parish Overview

KcC's population is a mix of all age groups, with a good proportion in full and part time employment, as well a substantial number of self-employed people and younger families on limited incomes. In addition there is a significant population of empty nesters and active retirees, all with travel needs both local, within and beyond the UK.

4.2 Railway Transport

As a result of the diverse needs of KcC summarized above, and in the absence of any bus service of substance, access to the UK railway network through the relatively good Saxmundham scheduled rail service provides a vital facility to KcC's in-county commuters, London leisure and business travellers, local ad-hoc travellers in Suffolk and via access to Lowestoft - onward into Norfolk and beyond.

In respect to the railway proposals, it is KcCPC's position that it will refrain from making comment on areas where the subject lays beyond its ability to make informed comment and defer to those with the specific knowledge base and/or are directly impacted by the proposals.

However, KcCPC wish to be clear on four points and seek appropriate reassurances from SZC on future discussion and consultation, specifically:

- i] That the existing Ipswich-Lowestoft rail services enjoyed by KcC residents, via Saxmundham station, are recognised and understood as a critical social amenity to KcC and will be safeguarded by SZC in the conduct of discussions with Network Rail on the scheduling and running of any freight on the Ipswich-Lowestoft line.
- ii] That were proposals on a 'passing loop' moved to the north of Saxmundham on the Ipswich-Lowestoft line, KcCPC be invited early on to participate in joint discussions with both SZC and Network Rail on those proposals.
- iii] That were proposals for any rail freight traffic changed and as a consequence it meant that freight trains would be approaching SZC from the north on the Ipswich-Lowestoft line, KcCPC be invited early on to participate in joint discussions with both SZC and Network Rail on those proposals.
- iv] KcCPC recognise that the proposed utilisation of rail transport for bulk materials potentially make a significant contribution to reducing road traffic HGV journeys and their impact on roads, environment and communities in Coastal Suffolk. Were proposals for rail freight traffic to be reduced and as a consequence HGV journeys increased, KcCPC wish to be invited to participate in joint discussions with both SZC and the other potentially impacted Parishes, on those revised proposals, as a matter of urgency and without delay, pending the formal Pre-application Consultation Process.

4.3 Marine Transport

In respect to the marine transport proposals, it is KcCPC's position that it will refrain from making comment on areas where the subject lays beyond its ability to make informed comment and defer to those with the specific knowledge base and/or are directly impacted by the proposals.

However, KcCPC wish to be clear on one point in respect to the Maritime Transport proposals and seek appropriate reassurances from SZC on future discussion and consultation, specifically:

- i] KcCPC recognise that the proposed utilisation of marine transport for bulk material potentially makes a significant contribution to the reduction of road traffic HGV journeys and their impact on roads, environment and communities in Coastal Suffolk. Were proposals for marine freight traffic to be reduced and as a consequence HGV journeys increased, KcCPC wish to be invited to participate in joint discussions with both

SZC and the other potentially impacted Parishes, on those revised proposals, as a matter of urgency and without delay, pending any formal Pre-application Consultation Process timeline.

4.4 Air Transport

KcCPC note with considerable concern the proposal for the location of a helipad in the Sizewell Gap portion of the SZC estate and seek clarification as to whether this facility is

- a) cost justified - when the climate seems to be that of limited funds
- b) to be operational just for the development period or for the lifetime of SZC
- c) to be a fully operational heliport with the commensurate ground resources and safety equipment
- d) to be used in the development of an 'air bridge' facility or just a passenger terminal
- e) better value than using existing commercial helicopter facilities in East Anglia, hence reducing the positive commercial benefits to East Anglia
- f) to be approached via land routing or from offshore routing
- g) going to be utilised on a high or low traffic basis and what the planning assumptions are in respect to aircraft type, volume and time of the day (or night) for inbound and outbound flights

In addition KcCPC wish to be provided with comfort on four points in respect to the Helipad proposals and seek appropriate reassurances from SZC on future discussion and consultation, specifically:

- i] KcCPC seek a fuller and detailed understanding of the proposed Helipad operation during the development, operational and decommissioning phases of SZC prior to the Stage 3 Pre-Application Consultation.
- ii] KcCPC seek assurances that an indemnity from SZC will be in place for the lifetime of the Helipad facility, whereby an owner of livestock that suffers distress resulting from an aircraft using a land based approach or departure route will be fully compensated for any resultant commercial loss.
- iii] KcCPC currently hosts numerous day and night training flights by WAH-64 Apache helicopters, travelling at a very low level and at high speed. KcCPC seek detailed assurances from SZC that agreements are in place with the MoD to ensure that all opportunities for collisions between SZC civil aircraft and RAF military aircraft have been mutually mitigated and that KcC residents can be assured that meticulous standards will apply to pilots and aircraft using the proposed Sizewell Gap Helipad.
- iv] KcCPC seek clarification from SZC on the world, European, and British safety record of helicopter traffic in the vicinity (50km radius) of electricity generating and distribution centres over the past 10 years.

5. Accommodation (ACC)

5.1 Kelsale cum Carlton Parish Overview

KcC, like many villages on the East Coast easily accessible from London and the South East, has seen a significant reduction in its available housing stock over the past twenty years. The volumetric impact is somewhat mitigated by the relatively high number of properties owned and operated by a Housing Association in partnership with the Local Authority.

However, overall the evidence is that second home ownership and holiday letting has been increasing and as a result property prices have effectively moved beyond many children of local residents pockets. This means there is little private rental available in the village outside of holiday lets.

KcC has one large static and touring caravan camping site and several smaller touring caravan and camping sites. In addition there are holiday cottages, 'Glamping' and other more tourist directed facilities in KcC.

5.2 Optimising Commercial Opportunity for KcC Residents & Businesses

Overall, KcCPC's preference would be to work co-operatively with SZC and village residents to optimise the income potential available to residents and businesses through

- 'spare room rental' arrangements that neither attracts tax or further depletes the KcC housing stock
- promotion of holiday let, camping and caravanning facilities where owners are agreeable

There has been no recent quantification of the possible availability within KcC of 'spare room rental' type accommodation. However, this is something that KcCPC might undertake and promote after agreeing the basis of SZC promotion of this style of accommodation with its employees and contractors going forward.

SZC Stage 2 Pre-Application Consultation documents imply that SZC may adopt a University type accommodation finder model, presumably making potential employees and contractors aware of vacancies in the local accommodation mix through an internet enabled vacancies bulletin board, bookings capability, etc. If this is the case then KcCPC will seek to exploit these facilities, perhaps linking in through the Parish Council website as a portal for local residents, or discussing how interested KcC residents and businesses might get direct access as a 'service provider' for accommodation.

KcCPC is also aware of the potential danger of property speculation for the purpose of long term letting to SZC workers, depleting the housing stock and forcing house prices up further.

Whilst in the short term this may be of advantage to some local residents looking to move elsewhere, KcCPC is concerned that in the medium to long term this could seriously damage the character and viability of the village.

Consequently, KcCPC would like to work with SZC to mitigate the risk and share SZC's experience in other areas where similar developments are under way, understanding what safeguards have been implemented and have been seen to work.

5.3 Accommodation Campus – Access & Parking

The Stage 2 Pre-Application Consultation documentation makes great play of the reduction in journeys resulting from the use of a single high capacity Accommodation Campus.

KcCPC agree that there are quantifiable benefits in using a single close proximity Accommodation Campus, as indeed most University towns have concluded in their quest to reduce the environmental and socio-economic damage arising from split campus operations.

However, KcCPC believe that as proposed, these benefits are not optimised, for example a car park facility where spaces are based on just a 1:1.6 ratio seems overly generous given the potential of Park & Ride.

As the current proposals fall a long way short of those achievable by national and international benchmarks, KcCPC believe that by implementing a few relatively simple actions, SZC could materially improve the traffic reduction gain by specifically:

- a] Removing all but a small number (<50) of ‘emergency use’ parking spaces from the Campus
- b] Placing strict controls on resident and service provider use of ‘emergency use’ parking spaces
- c] Implementing Employment Contract stipulations regarding use of the Park & Ride facilities and penalties for on-street parking in the surrounding area, towns & villages
- d] Providing airport type transfer buses (and possibly integrated baggage trailers) from each Park & Ride for the purpose of Campus residents transfer to and from their accommodation
- e] Providing an electric (‘Boris Bike’) facility at the Campus and development site, linking and extending into towns and villages (as previously proposed in Section 3cii above)
- f] Providing a covered site access route from the Campus to the development site including an electric bike lane and possible electric golf cart type capability for tool transfers, etc.
- g] Implementing Provider Contracts awarded for Campus and Development Site services based on normal commercial terms, but including an enforceable minimum journey stipulation with punitive penalties for breaches.

5.4 Accommodation Campus – Accommodation Management

KcCPC welcome the outline proposal in the Stage 2 Pre-Application Consultation documentation (5.12.3) relating to the provision of an Accommodation Management capability.

KcCPC, look forward to receiving fuller details of the scope, planned period(s) of activity, interface arrangements, promotional plan, accommodation standards required of accommodation providers by accommodation category, liability, responsibility and authority audit trails, etc. prior to commencement of the Stage 3 Pre-Application Consultation.

5.5 Accommodation Campus – Contingency and Unforeseen Consequences

KcCPC is concerned about the paucity of information in respect to the potential impacts on the everyday lives of KcC residents and businesses brought about by the scale of demand on various utilities, amenities, commodity and general services. Rather than deal with the specifics of the Campus here, all of the concerns are consolidated in Section 6 below.

6. Contingency and Unforeseen Consequences (CUC)

6.1 Kelsale cum Carlton Parish Overview

KcC is regarded by most residents and many statutory agencies as a rural community, largely dependent on short and middle distance urban areas for a wide range of services and specialist capabilities. This has led to the KcC community and KcCPC seeking to minimise disruption to services and providing wherever possible, contingencies that safeguard the health, wellbeing and independence of residents.

For example, a recent initiative funded and installed a portable defibrillator in a newly acquired traditional K6 phone-box. This action was taken in response to the demographic of KcC residents and forecast response times for paramedic and ambulance attendance in the event of a medical emergency. After more than a year, it is fortunate that this capability has not been used as a first response. However, on more than one occasion it has been on standby pending the arrival of the professional response.

By way of demonstrating a completely different type of initiative, KcCPC and the Village Hall Trust have combined their efforts to install high speed broadband in the Kelsale Village Hall & Centre, thereby where service is temporarily lost, (or in the more rural parts where service barely meets the minimum standard,) enabling residents access to a free high speed service to undertake everyday internet based activities. These kinds of contingencies are barely needed in many urban areas, but are essential to rural dwellers in the 21st Century.

KcCPC raise these initiatives as illustrative of the type of thinking that has to be undertaken in areas like KcC, where everyday services may not be directly accessible or immediately available.

The following paragraphs are illustrative of the type of issues that may occur as a result of the SZC development and operation and that should either be subject to contingencies or a 'systems thinking' approach where the unforeseen consequences are identified, weighted and prioritized for mitigation or resolution.

It is the view of KcCPC that the SZC Stage 2 Pre-Application Consultation documentation does not necessarily provide sufficient comfort that these (and potentially many other) items have received sufficient consideration and/or planning.

KcCPC look forward to receiving comfort from SZC that action is complete or in-hand to mitigate the unforeseen consequences and deliver contingent provisions within the overall SZC Programme.

6.2 Unforeseen consequences requiring contingent planning arising from road traffic movements along a single primary access route (A12 & B1122)

Section 3 Road Traffic Movements (RTM) raises a number of Unforeseen Consequences potentially arising as a result of the intensive use of the A12 and B1122 route for HGV, PSV, LGV, car and motorbike traffic.

These include, but not exclusively

- Increased incidence of road closure for ad-hoc maintenance
- Increased incidence of minor traffic incidents requiring temporary road closure
- Increased incidence of serious traffic accidents requiring extended road closure for incident investigation and/or carriageway surface repair
- Increased incidence of vehicle breakdown requiring temporary road closure for recovery (i.e. PSV/HGV)
- An inability to effectively turn the traffic flow on the B1122 due to traffic type (i.e. PSV & HGV), limited road width combined with soft verges.
- Deleterious impact on some KcC residents from increased carbon monoxide, hydro carbons, particulate matter and nitrogen oxides emitted by the volumetric increase in predominately diesel powered traffic on the A12 immediately adjacent to the village.
- Deleterious impact on Simpson's Fromus Valley nature reserve from increased carbon monoxide, hydro carbons, particulate matter and nitrogen oxides emitted by the volumetric increase in predominately diesel powered traffic on the A12 immediately adjacent to the reserve.
- A general decline in air quality in KcC resulting from increased carbon monoxide, hydro carbons, particulate matter and nitrogen oxides emitted by the volumetric increase in predominately diesel powered traffic on the A12 and B1122 that form two thirds of the surrounding main road routes.

KcCPC recognise that other statutory authorities and interest groups with more knowledge of these issues will be responding to the Stage 2 Pre-Application Consultation and seeking resolutions to some or all of these issues.

However, KcCPC wish to be clear on four points in respect to the foregoing points and seek appropriate reassurances from SZC on future discussion and consultation, specifically:

- i] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impacts on the people, flora, fauna and environment of the locality, that increased diesel powered road traffic will bring.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of pollution on the people, flora, fauna and environment of KcC.

- ii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impacts on KcC residents right of enjoyment of the amenity afforded by the A12, B1122 and surroundings roads in the event of road closure resulting from any of the above or other SZC driven events.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of road closure resulting from any of the above or other SZC driven events.

- iii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning and makes mention of 'other routes' that can be utilized by SZC in the event of the A12 & B1122 route becoming impassable, there seems to be little or no detail of these routes. Consequently KcCPC are unable to make comment or focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impacts on KcC residents right of enjoyment of the amenity afforded by the roads surrounding KcC in the event of road closure forcing SZC to utilise 'other routes'.

Consequently KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with the detailed proposals of the 'other routes' and proposals to minimize and mitigate the direct and indirect impacts on KcC of their use as an alternative to the A12 and B1122 route, short, medium or long term.

- iv] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impact on emergency service vehicles (Ambulance, Fire, Police & Coastguard) responding to urgent requests along the A12, B1122 and surroundings roads. In an area where Ambulance response is already severely strained, KcCPC are concerned that the traffic saturation of the A12 and B1122, along with concomitant increases in traffic on the surrounding roads and lanes may threaten the health and potentially the lives of KcC residents, visitors and workers.

Consequently KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with the detailed proposals to minimize and mitigate the direct and indirect impacts on emergency service vehicles responding to emergency situations and using the A12, B1122 and the surrounding roads and lanes of KcC.

6.3 Unforeseen consequences requiring contingent planning arising from the SZC accommodation proposals in the SZC Stage 2 Pre-Application Consultation Documents

Section 5 Accommodation (ACC) raises a number of Unforeseen Consequences potentially arising from the accommodation proposals coming forward from SZC.

KcCPC is acutely aware that its residents, businesses and other interest groups are very dependent not only on remote capabilities (e.g. hospitals, clinics, etc.) but also utilities that face increased complexities in sourcing and delivering service across KcC (e.g. water, electricity, telephone, broadband, mobile services, etc.). Additionally, KcC is not immune to a nationwide squeeze on scarce resources (e.g. GP services, dentists and Accident & Emergency facilities)

As a consequence KcCPC is very concerned that the SZC development, the commensurate influx of workers and a residential campus may have an unforeseen deleterious impact on the capabilities and services that KcC residents rely on.

These include, but not exclusively

- Increased water abstraction to meet demand from construction and campus residents may irrevocably damage the eco-system in one of the driest regions in the country
- A continuing squeeze on mains water that could in extremis lead to shortages at the tap and rationing through stand pipes and bowsers
- Increased demand for access to mobile telephone and data services may diminish further access to already poor coverage and lead to network congestion
- Increased demand for broadband and increased usage of the internet may diminish further access to a creaking infrastructure and lead to slower response times where already in some places they are barely meeting the 1-2mb minimum. It is also possible that increases in bandwidth intensive types of internet traffic (i.e. streaming movies) might lead to both mobile data and traditional broadband congestion.
- Foul water from both the Main Development and Campus sites is not dealt with in any detail with the SZC Stage 2 Consultation Documentation (save "...including water treatment plant..." and therefore must be considered to potentially negatively impact the efficacy of the existing infrastructure if any connection is to be made.
- There are no GP or Dental services in KcC, with residents relying on various access points spreading from Saxmundham to Leiston, Halesworth and even Ipswich for regular and emergency appointments. KcCPC is concerned that the scale of 'away from home' SZC workers and a large Campus concentration may push local GP and Dental services beyond breaking point without contingent action to bolster scarce resources.

KcCPC recognise that other statutory authorities and interest groups with more knowledge of these issues will be responding to the SZC Stage 2 Pre-Application Consultation and seeking resolutions to some or all of these issues prior to permission being agreed

However, KcCPC wish to be clear on four points in respect to the foregoing points and seek appropriate reassurances from SZC on future discussion and consultation, specifically:

- i] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents make much of the physical attributes of the proposed Campus it does little to expand on the functional considerations surrounding what could be considered the population an entire village (or two) being deposited in a locality with little in the way of modern urban infrastructure.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of the Campus populous on technological services (i.e. Mobile, Broadband & Telephone).

- ii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents make much of the physical attributes of the proposed Campus it does little to expand on the functional considerations surrounding what could be considered the population an entire village (or two) being deposited in a locality with little in the way of modern urban infrastructure.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of the Campus populous on utilities (i.e. Water, Sewage, Electricity and Gas).

- iii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents make much of the physical attributes of the proposed Campus it does little to expand on the functional considerations surrounding what could be considered the population an entire village (or two) being deposited in a locality with little in the way of modern urban infrastructure.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of the Campus populous on primary access to frontline medical services (i.e. GP & Dentistry services).

- iv] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents make much of the physical attributes of the proposed Campus it does little to expand on the functional considerations surrounding what could be considered the population an entire village (or two) being deposited in a locality with little in the way of modern urban infrastructure.

Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of the Campus populous on access to scarce remotely located medical services (i.e. Ambulance, Accident & Emergency, Hospitals and Clinics).

7. Emergency Planning (EP)

7.1 Kelsale cum Carlton Parish Overview

The proximity of KcC to the decommissioned Sizewell A and on-line Sizewell B reactors means that alongside neighbouring Parishes, Suffolk Coastal, Suffolk County Council and other statutory authorities, KcCPC has Emergency Planning as an integral part of its remit.

Consequently, KcCPC is concerned that comments in the SZC Stage 2 Pre-Application Consultation Documentation, directly or indirectly applicable to Emergency Planning, either during the Development, Operational or Decommissioning Phases of SZC, appear very few and far between.

As the complexity of Emergency Planning changes significantly during the SZC construction Phase when Sizewell B is on-line, daily vehicular activity is high, road congestion is significantly increased, the number of people in the locality is increased by up to 5,000 and the 'normality' of the Suffolk Coastal area is hugely disrupted. It was anticipated that SZC would be coming forward with outline proposals on the form of Emergency Planning going forward, any appropriate changes to inter agency protocols, collaborative working proposals for SZC with Sizewell B and the residual Sizewell A management.

- i] Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with proposals to integrate collaboratively the Emergency Planning of SZC, Sizewell B and Sizewell A in order to get early agreement with all involved agencies on a transitional plan to integrate Emergency Planning.

8. Employment & Supply Chain (E&SC)

8.1 Kelsale cum Carlton Parish Overview

The proximity of KcC to SZC, a thriving and top performing Primary School, a significant number of self-employed residents working across many industry sectors, several small and medium enterprises and a range of residential accommodation offerings should mean that KcCPC can look forward to galvanising links with SZC to

- a) Maximise the opportunity for KcC residents seeking employment to be aware of, and understand jobs available with SZC on an ongoing basis
- b) Enable KcC's self-employed, small & medium enterprises to understand what commercial opportunities exist for them with SZC on an ongoing basis
- c) Enable children at the Primary School to appreciate what SZC is, the work involved in its development and operation and potentially allow them in due course to make informed career choices that improve their employment opportunities in the locality, should they so wish.

Consequently, KcCPC look forward to working with SZC towards advancing these objectives.

SZC may wish to be aware of the facility offered by Kelsale Village Hall and Centre Trust, in being able to offer a large (100 attendees) and a smaller (30) local meeting facility, complete with high speed broadband access and kitchen facilities, should the need arise. KcCPC will provide contact details as and when necessary.

SZC Stage 2 Pre-Application Consultation Consultation Questionnaire

Kelsale cum Carlton Questionnaire Response

1. Sizewell C Proposals: Overall

What are your overall views on EDF Energy's proposals to build a new nuclear power station, Sizewell C and associated development?

Kelsale cum Carlton Parish Council does not have a formal position on the proposal from EDF Energy or any other company in respect to the building of a new nuclear power station. This enables Kelsale cum Carlton Parish Council to respect the breadth of opinions held by residents and to remain objective in navigating the challenges it presents.

Kelsale cum Carlton Parish Council seek further details in regard to

- Increased Policing and security during construction, operations and decommissioning
- Mitigation of detrimental impacts on scarce resources
 - GP services
 - Hospital & Clinic services
 - Ambulance & Fire service
 - School and availability of places
 - Coastguard and Lifeboat services

2. Main Development Site: Environment

What are your overall views on the potential environmental impacts and proposed mitigation at the main development site?

Kelsale cum Carlton Parish Council is a strong advocate of a 'minimal environmental impact' philosophy in the built and natural environments. It is home to two organic farms, several nature reserves including protected roadside reserves.

In respect to the impacts of SZC on the environment and the potential mitigations, Kelsale cum Carlton Parish Council does not possess sufficient expertise to make informed comment.

Consequently, Kelsale cum Carlton Parish Council takes the view that the varied opinions of local, national and international specialists should have their views respected and defers to their depth and breadth of experience on this matter.

3. Main Development Site: New Access Road

We are proposing to build a new, permanent access road to link SZC to the B1122. This would be the main route to bring workers and materials onto the site during construction and the main access for SZC once the station is operational.

The new access road would need to cross the Sizewell Marshes SSSI and we are considering four options.

Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of this SSSI and the specific issues needed to be considered in ranking the efficacy of each of the options.

Consequently, Kelsale cum Carlton Parish Council takes the view that the specific opinions of local and where appropriate national specialists with experience of this habitat should have their views respected and defers to their depth and breadth of experience on this matter.

4. Main Development Site: Managing Construction Materials

To reduce the need to transport large quantities of materials out of the site during construction, we are proposing to take construction material for use in building the power station from one or more 'borrow pits'. This land would be backfilled with excavated peat and clay. The excavated and backfill material would need to be stockpiled at different points in the construction phase.

15 hectares of land would be required. Three potential field combinations are proposed for the borrow pits.

Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options. Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council takes the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

5. Accommodation: Overall Strategy

During the peak construction phase we anticipate about 36% of the construction workforce would live at home (home based), with the rest requiring temporary accommodation in the area (non-home-based).

To accommodate some of the non-home-based workforce, we are proposing a 2,400 bed campus at the main development site and temporary caravan park on the land to the east of Eastlands Industrial Estate. We anticipate the remaining workers would live in private rented or tourist accommodation, or would buy a home locally.

Kelsale cum Carlton Parish Council takes the view that measures to reduce traffic volumes and reduce unnecessary car journeys are a good thing. So in that respect a campus proposal, combined with other local housing (safeguarding the low income sector specifically from predatory pricing) for non-home-based workforce is a step in the right direction.

However, Kelsale cum Carlton Parish Council are concerned that the late delivery and early closure of both park & ride facilities (within the construction phase) combined with the volume of on-site parking, a low car share ratio of 1:1.1 and a parking space ratio of 1:1.6 does not maximize this opportunity (See Kelsale cum Carlton Parish Council Response Section 3 Road Traffic Movements).

Consequently, whilst Kelsale cum Carlton is supportive of the overall strategy it believes the current proposed execution of the strategy is a disaster and rides in the face of an avowed intent by SZC to reduce the impact of construction on the locality, its residents and road infrastructure.

6. Accommodation: Campus Layout

We are considering two main layout options for the accommodation campus, which is sited within the main development site. Option 2 has sub-options (i and ii) relating to the location of the sports facilities...

Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options. Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council takes the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

Kelsale cum Carlton Parish Council is concerned that although alluded to in the SZC Stage 2 Pre-Application Consultation Documentation, a more definite statement is required in respect to [all postal](#)

and courier deliveries (for residents and site administration) be required to be consigned at the Southern Park & Ride mail consolidation facility for subsequent bulk transit to the SZC site. In the view of Kelsale cum Carlton Parish Council this has at least two positive impacts

- Mail and parcels can be security screened at the mail consolidation centre
- The LGV traffic resulting from personal deliveries (i.e. Amazon, etc.) being directed to the campus can be avoided, further reducing unnecessary traffic.

The latter is particularly important as local experience indicates that some contract drivers for courier companies servicing the Kelsale cum Carlton Parish Council area have little regard for pedestrians, horse riders, lane verges & hedgerows and other traffic.

Further afield, there are growing concerns that courier drivers in rural areas are using satnav irrespective of road signage, leading to damage, accidents and inappropriate use of by-ways.

More recently, in rural areas of Kent there have been incidents of couriers encountering dog walkers on country lanes and in at least one instance killing a walker's dog, despite it being on a lead.

Kelsale cum Carlton Parish Council seek clarification from SZC as to whether discussions with owners of SZA and SZB have been had in regard to shared use of SZA and SZB estates to reduce the gross demand on new land areas during the construction phase (i.e. Accommodation Campus, Light Good Vehicle Deliveries, etc.).

7. Transport: Overall Strategy

To reduce the volume of freight that would be delivered by road, both sea and rail transport would play a major role in the movement of materials on and off the main development site.

We are proposing park and ride facilities, a postal consolidation facility and an accommodation campus to further reduce traffic impacts on local roads.

We are no longer proposing a lorry management facility as we now consider this can effectively be managed through other means.

Kelsale cum Carlton Parish Council takes the view that measures to reduce traffic volumes and reduce unnecessary car journeys are a good thing. So in that respect a mixed materials handling strategy (marine, rail and road) is a step in the right direction.

However, Kelsale cum Carlton Parish Council are concerned that the proposals do not go far enough in minimising the reliance on road traffic (HGV, PSV, LGV, car and motorbikes) for avoidable close-in journeys.

Consequently, whilst Kelsale cum Carlton is supportive of the overall strategy it believes the current proposed execution of the strategy is a disaster and rides in the face of an avowed intent by SZC to reduce the impact of construction on the locality, its residents and road infrastructure.

Sections 3 (Road Traffic Movements – RTM) and 4 (Non-Road Traffic Movements – NTM) of the KcCPC's response give a more detailed response in respect to concerns, issues, mitigation, foreseeable and unforeseen consequences.

In summary the key points are:

1. Opening Park & Ride sites prior to work commencing at SZC
2. Retaining Park & Ride sites for the subsequent Operational & Decommissioning Phases
3. Drastically reducing parking spaces at both the campus and main site to 10's not 1000's.
4. Reducing Permit parking on both the campus and main site to an 'exception only basis' for all Phases of the SZC's lifecycle
5. A concerted effort to build and promote a 'Boris Bikes' electric bike capability for close proximity workers (resident and non-resident), providing suitable cycle routes, preferably standalone or working with Suffolk Highways to provide carriageway integral cycle paths where other options are not possible.
6. No 'direct to site' delivery of letters and parcels by Royal Mail and its competitors, Parcelforce and its competitors and couriers acting on behalf of retailers, online service providers, etc. Instead routing all mail and parcel traffic to the SZC Mail Consolidation facility for subsequent bulk transport to the SZC site.
7. Detailed scrutiny on the need for a helipad capability and if retained explicit controls on its use, optimization of the use of offshore inbound and outbound routes. The undertaking and publication of a detailed risk assessment and mitigation plan for identified risks, with specific reference to the peaceful enjoyment of the coast and countryside by residents, visitors, wildlife and farm stock, ensuring safe use of the surrounding area by other civil and military aircraft, continued enjoyment of their homes and gardens by the residents of all the communities of Coastal Suffolk, free from SCZ air movements.
8. The omission of any detailed Air Quality data for the length of A12 and B1122 route and an Air Quality propagation forecast for the Kelsale cum Carlton Parish area is of great concern and must be remedied as soon as possible, with detailed discussion prior to the formal SZC Stage 3 Pre-Application Consultation.

9. Kelsale cum Carlton Parish Council note that traffic modelling (6.3.24) has assumed that “...no construction workers would walk, cycle or motorcycle to...” thereby giving a maximum traffic flow model.

However, Kelsale cum Carlton Parish Council wish to understand the planned secured capacity of each Park and Ride for motorcyclists and cyclists. In addition, whether there will be lockers for the storage of protective clothing and equipment.

Similarly, what secure facilities are planned for cyclists at both the campus and main development site.

10. Kelsale cum Carlton are currently working with Benhall and Saxmundham Parish Councils to see if it is possible to take forward a planned cycle route between and through the Parishes.

Consequently, Kelsale cum Carlton Parish are interested to understand what plans SZC are developing for a network of cycle routes and how they might integrate with the existing and planned ones in Coastal Suffolk.

11. Kelsale cum Carlton Parish Council note that the volume of light goods vehicles is significant and would include a wide range of uses (6.4.63) and user groups.

Kelsale cum Carlton Parish Council regard this traffic as a potential threat to the country lanes of both Kelsale cum Carlton and the surrounding villages and looks forward to receiving what proposals SZC have to ensure that this traffic is regulated and controlled, ensuring that quiet country lanes, the protected environments within them, flora and fauna and other lane users are protected from the establishment of informal ‘rat runs’.

8. Transport: Rail

Rail would play an important role in delivering freight to site during the construction phase. During the early stage of construction we are proposing to use an existing rail terminal south of King George’s Avenue in Leiston (‘Sizewell Halt’) to support some rail deliveries.

There are two options we are considering to further increase our ability to use rail during the construction of SZC.

Kelsale cum Carlton Parish Council takes the view that measures to reduce traffic volumes and reduce unnecessary car journeys are a good thing. So in that respect a railhead for materials handling is a step in the right direction.

However, Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options.

Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council take the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

Kelsale cum Carlton Parish Council note the lack of substantive comment by SZC on use of the rail line or railhead beyond the construction phase of SZC and would seek agreement by SCZ to not only be explicit in the Stage 3 Pre-Application Consultation about its potential use in both the operational and decommissioning phases.

In addition, Kelsale cum Carlton Parish Council would seek to get SZC's views on:

- the opportunity (in consultation with track authority and East Coast service provider) of using the rail line as a possible workforce transport route during the SZC operational and decommissioning phases, thereby providing a lower traffic volume option for operations and decommissioning.
- in the event that retention of the line and railhead for future is not planned by SZC, what are the proposals for both the line and railhead, timescales and the planned removal and remediation of both?

9. Transport: Sea

As part of our transport strategy to reduce the number of HGV movements on the local road network associated with the development of SZC, we are looking at three options for transporting material directly to site by sea during construction.

Both jetty options (Option 1 and 2) would be removed at the end of the construction period. The beach landing facility (Option 3) would remain for occasional use during the operation of the power station this proposed use during operation would exist even if it is not chosen for use during construction.

Kelsale cum Carlton Parish Council take the view that measures to reduce traffic volumes and reduce unnecessary car journeys are a good thing. So in that respect a jetty or beach landing facility for materials handling is a step in the right direction.

However, Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options. Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council take the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

10. Transport: Park and Ride

We are proposing two park and ride facilities at key locations on the A12 to enable workers to travel by bus rather than private car to the SZC site, one to capture traffic coming from the north, and one to capture traffic coming from the south.

Please note that two sites – rather than options – are proposed. We welcome your feedback on either or both of these sites.

Kelsale cum Carlton Parish Council take the view that measures to reduce traffic volumes and reduce unnecessary car journeys are a good thing. So in that respect the Park and Ride strategy is a step in the right direction.

However, Kelsale cum Carlton Parish Council are concerned that the proposals do not go far enough in minimising the reliance on private car road traffic for avoidable close-in journeys to the SZC site.

Consequently, whilst Kelsale cum Carlton is supportive of the overall strategy it believes the current proposed execution of the strategy is suboptimal and tests the determination with which SZC have avowed to reduce the impact of construction on the locality, its residents and road infrastructure.

Sections 3 (Road Traffic Movements – RTM) and 4 (Non-Road Traffic Movements – NTM) of the KcCPC's response give a more detailed response in respect to concerns, issues, mitigation, foreseeable and unforeseen consequences.

In summary the key points are:

1. Opening Park & Ride sites prior to work commencing at SZC
2. Retaining Park & Ride sites for the subsequent Operational & Decommissioning Phases
3. Drastically reducing parking spaces at both the campus and main site to 10's not 1000's.
4. Reducing Permit parking on both the campus and main site to an 'exception only basis' for all Phases of the SZC's lifecycle
5. A concerted effort to build and promote a 'Boris Bikes' electric bike capability for close proximity workers (resident and non-resident), providing suitable cycle routes, preferably

standalone or working with Suffolk Highways to provide carriageway integral cycle paths where other options are not possible.

6. No 'direct to site' delivery of letters and parcels by Royal Mail and its competitors, Parcelforce and its competitors and couriers acting on behalf of retailers, online service providers, etc. Instead routing all mail and parcel traffic to the SZC Mail Consolidation facility for subsequent bulk transport to the SZC site.
7. The omission of any detailed Air Quality data for the length of A12 and B1122 route and an Air Quality propagation forecast (under different traffic mix models) for the Kelsale cum Carlton Parish area is of great concern and must be remedied as soon as possible, with detailed discussion prior to the formal SZC Stage 3 Pre-Application Consultation.

Kelsale cum Carlton Parish Council note that despite being referred to in 4.4.19, a "...Traffic Incident Area to enable HGV's to be held..." does not seemingly appear in Figure 4.7 nor is there any reference to the holding capacity. Consequently, Kelsale cum Carlton Parish Council seek clarity on these questions and the contingent plan for holding HGV traffic beyond this capacity if the incident is more protracted than the capacity planned.

11. Transport: Road Improvements – A12

Sizewell C construction traffic may result in the need to provide mitigation at Farnham to improve traffic flow and safety through the narrow bend.

We are considering four main options – option 3 has two versions (A and B) relating to where the bypass connects to the A12.

Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options. Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council take the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

12. Transport: Road Improvements – Yoxford/B1122

The B1122 would experience a significant increase in traffic as a result of Sizewell C. We have identified a number of potential mitigation measures along the stretch including Yoxford and Theberton to

improve road safety such as junction improvements, a speed limit reduction, pedestrian enhancements and improvements to the road alignment.

In relation to the junction of the A12/B1122 at Yoxford we have identified some specific options:

Option 1: Roundabout

Option 2: Signalised junction

We have also identified a number of other potential mitigation measures:

- Speed limit reductions on the B1122 – 40mph reducing to 30mph approaching SZC
- Improvement to the B1122 west of Mill St, Middleton Moor for visibility improvement
- Two proposals for pedestrian enhancement in Theberton
 - o Pedestrian crossing & footpath near Pump Cottages
 - o Pedestrian path and crossing near Church of St Peter Theberton
- Improvement to alignment of B1122 between Theberton and SZC site entrance

Kelsale cum Carlton Parish Council do not have sufficient knowledge or experience of the specific areas needed to facilitate the ranking of the relative efficacy of each of the options. Particularly taking into account the range of issues that may constitute a good decision (environmental, disruption, noise, local resident amenity (visual and physical), etc.).

Consequently, Kelsale cum Carlton Parish Council take the view that the specific opinions of local residents, local and where appropriate national specialists with experience of this area, should have their views respected and defers to their depth and breadth of experience on this matter.

In respect to the A12 & B1122 Route, Kelsale cum Carlton Parish Council wish to draw SZC's attention to Section 3 Road Traffic Movements (RTM) and Section 6 Contingency and Unforeseen Consequences (CUC) of their response and in particular issues relating to potential for B1122 closure, turnaround of HGV vehicles on the B1122 and soft verges.

Kelsale cum Carlton Parish Council also note with great concern that the proposed Yoxford junction options do not appear to recognise or propose ways of dealing with issues relating to the easy and safe progress of pedestrians, cyclists, horse riders, etc. around and or across any new design layout.

13. People and Economy

We are keen to ensure that local communities and businesses are able to make the most of the opportunities arising from SZC, while potential adverse impacts on the area are limited.

The proximity of Kelsale cum Carlton to SZC, a thriving and top performing Primary School, a significant number of self-employed residents working across many industry sectors, several small and medium

enterprises and a range of residential accommodation offerings should mean that Kelsale cum Carlton Parish Council can look forward to galvanising links with SZC to

- a) Maximise the opportunity for Kelsale cum Carlton residents seeking employment to be aware of, and understand jobs available with SZC on an ongoing basis
- b) Enable Kelsale cum Carlton's self-employed, small & medium enterprises to understand what commercial opportunities exist for them with SZC on an ongoing basis
- c) Enable children at the Primary School to appreciate what SZC is, the work involved in its development and operation and potentially allow them in due course to make informed career choices that improve their employment opportunities in the locality, should they so wish.

Consequently, Kelsale cum Carlton Parish Council look forward to working with SZC towards advancing these objectives and wherever possible leveraging the potential of SZC to support local initiatives and facilities enhancing the lives of Kelsale cum Carlton residents.

SZC may wish to be aware of the facility offered by Kelsale Village Hall and Centre Trust, in being able to offer a large (100 attendees) and a smaller (30) local meeting facility, complete with high speed broadband access and kitchen facilities, should the need arise for such a capability over the coming months and years. Kelsale cum Carlton Parish Council will happily provide contact details as and when necessary.

14. Consultation Process

EDF Energy has committed to undertaking three stages of pre-application consultation to inform its proposals for new nuclear build at Sizewell C and associated development to enable its construction. For the Stage 2 Consultation, we have produced two main documents a consultation document containing technical information and a summary document. We have also provided other supporting material including Computer Generated Images (CGI's) and a model. We are holding a number of Public Meetings

Kelsale cum Carlton Parish Council welcome the 3 Stage Consultation approach, but within that have found the detail lacking in some of the proposals put forward.

Consequently, it has been very difficult to respond in a substantive way to both overall questions on the proposals and identification of the specific impact of proposals on Kelsale cum Carlton and its residents.

Moreover, it would have been (and still could be) very helpful if the source analysis and detailed documents could be made available to Parish Councils (possibly through a secure online capability) to enable a more focused and informed response to have been made.

The consequence is, that in this response Kelsale cum Carlton perceive a need to meet with SZC prior to Stage 3 Pre-Application Consultation to fully understand proposals that remain unclear after our Stage 2 submission and prior to Stage 3 Consultation commencing.