

Executive Summary

Introduction

This document summarises the conclusions reached by Kelsale cum Carlton Parish Council following the publication of the Sizewell C Stage 3 Pre-application Consultation on the 4th January 2019.

In formulating its response, Kelsale cum Carlton Parish Council has sought the views of residents by way of a Public Meeting and a door to door delivery of a quantitative and qualitative response mechanism.

The published EDF Energy documentation (Volume 1 – Development Proposal, Volumes 2a & 2b of the Preliminary Environmental Information and Volume 3 Preliminary Environmental Information Figures) has been reviewed during the compilation of Kelsale cum Carlton Parish Council's response.

The attached document 'Kelsale cum Carlton Parish Council's Detailed Response to Sizewell C Stage 3 Pre-Application Consultation' is structured to mirror EDF Energy's Volume 1 – Development Proposal and contains detailed comments, observations, evidence where available and ideas for EDF Energy's consideration. It is augmented by responses to EDF Energy's accompanying PEI where appropriate.

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

Text in black is that of EDF, whilst Kelsale cum Carlton Parish Council's [KcCPC] responses are made in blue.

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

Conclusions

In coming to its conclusions Kelsale cum Carlton Parish Council has; tried to remain objective, listened to the variety of views expressed by residents, considered the broad picture emerging of East Suffolk over the next 10 to 20 years and the potential needs and demands of local businesses, residents, visitors and the short to medium term environmental issues likely to be impacting them.

As a consequence, Kelsale cum Carlton have concluded that:

A] The Council is unable to support the Road-Led proposal being brought forward by EDF Energy at Stage 3

The principal considerations in coming to this decision are threefold:

- Firstly, it is the view of the Council that even on a standalone basis, the demands of the Road-Led proposal place too heavy a reliance on HGV traffic moving the bulk of the required 10.7 million tonnes of construction materials along the A12. A complex road architecture that the Council believes, even with proposed works by EDF Energy, would not safely accommodate EDF Energy construction traffic and the other 'normal' demands being made on it by; existing business, residents and visitors.

- Second, the Council believes that the safety and well-being of many Kelsale cum Carlton residents would be severely compromised in the conduct of their day to day lives, as a direct result of the forecast traffic levels on the A12 (particularly HGV, bus and Light Goods Vehicles). Moreover, the Council believes that those residents in close proximity to the A12 may be exposed to significantly higher levels of air pollution resulting from an intensification of traffic and particularly those powered by diesel engines.
- Finally, the Council is aware of an increasing number of additional major influences impacting, or likely to impact the A12 in a similar timeframe as the proposed Sizewell C construction. The Council have formed the view that the cumulative impact on the A12, either confined to the south of Woodbridge or along a greater part of its length is unsustainable and represents a real threat to the ability of East Suffolk residents, businesses and visitors to undertake relatively simple activities without significant preparation.

B] Whilst the Council would like to be able to give full support to the Rail-Led proposal being brought forward by EDF Energy at Stage 3, it is unable to give it unqualified support because of three key considerations:

- Firstly, it is the view of the Council that, similarly to the Road-Led proposal, the demands on the A12 remain too heavy. As mentioned previously, it is a complex road architecture and the Council remain unconvinced even with proposed works by EDF Energy, that it would safely accommodate EDF Energy construction traffic and the other 'normal' demands being made on it by; existing business, residents and visitors. In coming to this conclusion the Council considered the number of HGV and Bus movements and the observed behaviour of mixed traffic accelerating and decelerating, when slower moving vehicles are in the majority.
- Second, once again the Council were concerned that the safety and well-being of many Kelsale cum Carlton residents would be severely compromised in the conduct of their day to day lives, as a direct result of the forecast traffic levels on the A12 (particularly HGV, bus and Light Goods Vehicles). Moreover, they remained concerned that those residents in close proximity to the A12 would be exposed to significantly higher levels of air pollution resulting from an intensification of traffic and particularly those powered by diesel engines.
- Third, the Council considered the rail component as relatively unambitious and subject to a lot of qualification, both by EDF Energy and seemingly by EDF Energy on behalf of Network Rail. In coming to this conclusion, the Council were aware that rail infrastructure is subject to a limited supply-side capability and therefore can be more difficult to determine in terms of design, integration and deployment. However, the Council were minded that a more ambitious scheme might; focus minds, attract a higher degree of interest, expand lateral thinking and potentially leverage a greater degree of support.

C] In any circumstance, the Council was unable to do anything other than oppose the EDF Energy proposal brought forward at Stage 3 for the development of a Sizewell Link road:

The principal considerations in coming to this decision are twofold:

- Firstly, it is the view of the Council that, the provision of a Sizewell Link road at the northern end of EDF Energy's A12 route does nothing to alter the fundamentally unsound nature of the A12 route, all the way from a congested A14 J58 in the south, through the busy Foxhall roundabout and onto the congestion in the Martlesham and Woodbridge areas, before approaching the tricky single carriageway stretches at Marlesford and Little Glenham. The Council also noted that the

proposed highway improvements would not be on-stream until well into the 'early years', 2024 in the case of the two village bypass.

- Second, the routing of a Sizewell Link road from a point on the A12 at the northern border of Kelsale cum Carlton is an ecological disaster for both Kelsale cum Carlton and the neighbouring parishes. Its construction involves the loss of an estimated 120 hectares of 'best and most versatile' agricultural land, and ponds, trees, hedgerows and ground habitats offering shelter to a wide range of birds, mammals, reptiles, insects and flora. It also disrupts the historic migratory route of Red Deer from the Fromus Reserve (to the west of the A12) to the rutting grounds of the Coastal Heathlands AONB.

The Council also reviewed the other routes explored by EDF Energy that crossed the Kelsale cum Carlton parish and found that they too did nothing to address the fundamental issue of the EDF Energy proposed A12 route (as discussed above). Moreover, the Council noted the alternative routes were either adjacent to or partially within the recently designated Kelsale Village Conservation Area, impacted a newly designated Roadside Nature Reserve and would also impact habitats akin to those comprising the Sizewell Link road route being brought forward by EDF Energy at Stage 3.

D] As a consequence, Kelsale cum Carlton have also concluded that they are:

- opposed to all further link road options (current or new) until EDF Energy objectively review the sustainability of any proposals, where the majority of the route is dependent on a largely unmodified A12 and is host to the multiplicity of projects currently under consideration, or already approved. Moreover, Kelsale cum Carlton would expect EDF Energy's modelling to fully reflect the burden of tourist traffic.

In concluding, KcCPC would like to draw EDF Energy's attention to the response from the Department of Transport (**Appendix H**) in respect to the exclusion of weekend and holiday periods from traffic modelling of schemes in 'Holiday Centres'. In particular KcCPC note "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 through an Appraisal Specification Report (ASR) in line with the TAG SRO Unit Section 1.2.