

# Sizewell C

## Detailed review of the SZC Co. 30 day Public Consultation (18<sup>th</sup> November to 18<sup>th</sup> December 2020)

### Introduction

Kelsale-cum-Carlton Parish Council [KcCPC] have participated fully in the Sizewell C Pre-Application Consultations and note the first 'Post DCO Application Consultation' marks the commencement of KcCPC's ninth year of responding to a plethora of; 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that have subsequently largely been; qualified out, significantly modified, re-badged or still remain subject to 'continuing analysis'.

As a consequence, KcCPC is disappointed that at 'one minute to midnight', EDF Energy and NNB Generation Company (SZC) Ltd [SZC Co.] seem determined to demonstrate further disdain for the prescribed process and have once again resorted to another ill-prepared engagement with the people and organisations in Suffolk that are amidst the most profound health and economic crisis visited on the county in living memory as a consequence of the pandemic.

Nevertheless, KcCPC have once more committed many hours of work to review the 174 page document, not only in the context of the previous Pre-Application Consultations, but also the huge volume of documents accompanying the DCO Application.

In making its assessment KcCPC note SZC Co. chose to make the DCO Application on 27<sup>th</sup> May 2020, despite much of the UK being under Covid-19 restrictions.

In so-doing, SZC Co. fully understood that the DCO Application might be accepted by the Planning Inspectorate for examination relatively speedily (actually occurring on 24<sup>th</sup> June 2020, again under Covid-19 restrictions) and thereby potentially requiring interested parties to make their Relevant Representations soon thereafter (again under Covid-19 restrictions). It subsequently transpired that Relevant Representations were accepted up to 30<sup>th</sup> September 2020, again under Covid-19 restrictions.

As is now clear, having set 'hares running', SZC Co. have chosen to further exploit the intense pressure on limited community resources to bring forward yet more 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' that largely remain incomplete or lacking in; underpinning data, detailed analysis, necessary agreements, cumulative impact analysis, any appraisal of likely unforeseen consequences and their wider efficacy.

Nevertheless, KcCPC recognise that it must continue to participate in the prescribed process in order to try to safeguard the community of Kelsale-cum-Carlton from the worst excesses of SZC Co.

The following pages summarise KcCPC's review of the SZC Co. Consultation Document and form the basis of the Executive Summary and the contents therein.

A significant number of questions are raised by the Consultation Document and these are identified with a **Q** at the right hand side. The Council anticipate SZC Co. responding to these questions prior to the Planning Inspectorate commencing its examination.

Text in *blue italics* indicates the text is sourced from SZC Co.'s Consultation Document.

**Note:** The absence of a specific comment in this response does not imply, nor should it be interpreted as implying Kelsale-cum-Carlton Parish Council having no issues pertaining the paragraph where there are no views expressed.

## CHAPTER 1. INTRODUCTION

### 1.1 Introduction

(1.1.2) It is noted that the capacity of the proposed Sizewell C power station is now confirmed at 3.34gw, clearing up the confusion created in the Stage 4 Pre-Application Consultation documentation.

(1.1.4) It is noted that whilst “...feedback from these consultations was considered throughout the development of the proposals and strategies for the Sizewell C Project and in the finalisation of the Application.” seemingly significant elements of the feedback were not considered important enough by SZC Co. to delay the DCO Application long enough for them to be fully considered, developed and incorporated into a robust DCO Application.

As a direct consequence residents, businesses and other agencies in Suffolk have to disentangle SZC Co. thinking from across the four previous consultations to understand the tapestry of the latest ‘possibilities’, ‘potential’, ‘opportunities’, ‘ideas’ and ‘initiatives’ being promulgated.

(1.1.5) Whilst in principle KcCPC welcomes progressive thinking that realises beneficial reductions in the level of adverse impacts on the “...local area and environment...”, it cannot unequivocally offer the same support for “...potential changes which will assist with the efficient construction of the project.” without fully understanding the conditions giving rise to, and the nature of the efficiencies being generated.

(1.1.6) Whilst in principle KcCPC would welcome the creation of “...an independent environmental Trust to manage the ongoing re-wilding and biodiversity of the growing Sizewell Estate.” it wishes to be clear on four things;

a) Re-wilding is a very long and hazardous path to replace/replicate hundreds of years of natural development. Consequently, the operational lifetime of Sizewell C seems wholly inadequate for financial support from SZC Co. The provision of an ‘in perpetuity endowment’ would seem far more proportionate.

b) KcCPC notes SZC Co. refer to a Trust as an ‘opportunity’, whereas as unconditional proposal, (assuming the project went ahead) appears more genuine and might be seen as far more compelling.

c) The phrase “We will update the community regularly on our progress.” seems inappropriate and alludes to something other than “...an independent environmental Trust” or perhaps it is just a poor portrayal of genuine intent?

d) Current Government thinking is very supportive of sustaining and increasing ecological assets and the avoidance of loss. Would SZC Co. not agree that they should review their DCO Application using this prism, prior to bringing forward any further changes? 

(1.1.8) In Table 2.1 of the Notification of Proposed Project Changes – PINS Reference Number: EN010012 SZC Co. identifies 14 changes. Yet in this paragraph various proposed Project changes have been unpacked, with the total proposed Project changes increasing to 18.

This seemingly arbitrary rearrangement gives rise to confusion and a lack of transparency in the messages being given to the Planning Inspectorate and the public at large.

Is this a deliberate strategy adopted by SZC Co. in order to; minimise the volume of proposed changes to the Planning Inspectorate whilst simultaneously portraying the maximum number beneficial (?) changes when communicating with consultees? 

**Note:** Reference to the Northern Park & Ride is not included in the “Table 2.1 Summary of proposed Project Changes” provided to the Planning Inspectorate (Pages 6 & 7 Notification of Proposed Project Changes – October 2020) but appears here.

#### 1.4 Status of the Sizewell C Project

(1.4.1) Whilst it plays well to the gallery, isn't it disingenuous to proclaim *"SZC Co. has prioritised consultation since the early stages of the development of our proposals..."* as not to do so would have severely jeopardised the prospects of the project? Q

(1.4.2) KcCPC note that *"Following the last stage of pre-application consultation, SZC Co. took time to consider feedback, further refine our proposals and... make sure that the Application reflected the proposals we considered necessary and appropriate for the construction... of Sizewell C."*

However, within a little over three months of agreeing the DCO be accepted for examination, SZC Co. sought agreement from the Planning Inspectorate to make further changes to their Application. It is noted that this timing adequately allowed SZC Co. to have had sight of not just the volume of Relevant Representations, but also their content.

Taking the foregoing into account, KcCPC is left with little alternative but to conclude that the undue haste with which SZC Co. has taken its most recent steps were, and remain an attempt to exploit prevailing circumstances and manufacture a situation where depleted resources are thoroughly tested in their resolve and ability to respond adequately within the timing and Covid-19 constraints.

This latest consultation exemplifies the situation described above and not only pressurises those wishing to respond, but also enables the Applicant to bring forward a further tranche of incomplete 'possibilities', 'potential', 'opportunities', 'ideas' and 'initiatives' for exploration (and/or potentially exploitation) within and presumably post, the examination phase.

(1.4.6) KcCPC note the intention of SZC Co. to submit a DCO Application 'change request' to the Planning Inspectorate in January 2021, doubtless with no prior visibility of those proposals having been given to stakeholders and other interested parties, unless compelled by the Planning Inspectorate? Q

#### 1.6 Process for seeking changes to the DCO Application

(1.6.1) KcCPC notes the all-pervasive use of the verb 'minimise' and questions how you can *"... further minimise..."*, insofar as 'to minimise' is to have reduced to the smallest amount or degree already? Q

Would SZC Co. concede they should have more appropriately used 'reduced' and therefore have been able to have *"... further reduced..."*? Q

That being the case, can they review the overuse and/or inappropriate use of 'minimise' and make suitable changes to the DCO Application, prior to seeking amendment for clarity? Q

#### 1.7 Structure of this consultation document

(1.7.1) KcCPC note the apparent interchangeability that some words have in SZC Co. Consultation Documents, yet none, (with the notable exception of 'proposals') are formalised in the References, Abbreviations and Defined Terms section. Are SZC Co. using the appropriate dictionary definitions of these undefined terms? Q

For example:

**Proposed** – 'put forward for consideration'

**Potential** – 'capable of coming into being or action'

## CHAPTER 2. PROJECT OVERVIEW

### 2.1 Introduction

(2.1.3) As identified in 1.7.1 (above) there is an apparent interchangeability that some words have in SZC Co. documents, yet none (with the notable exception of ‘proposals’) are formalised in the References, Abbreviations and Defined Terms section. For the avoidance of doubt, is SZC Co. using the appropriate dictionary definitions of these undefined terms? Q

That is to say for example:

Proposed – ‘*put forward for consideration*’

Considered – ‘*contemplated... weighed the merits of... made after careful thought... etc.*’

Potential – ‘*capable of coming into being or action*’

It would seem unnecessary to preface much of the work put forward by SZC Co. in this consultation with such a breadth of unqualified terms or is this simply obfuscation? Q

(2.1.4) As identified in 2.1.3 (above) this is exemplified in this paragraph where SZC Co. state “... *sets out further details of the changes to that strategy or site and sets out the relevant proposed development which was included in the Application, a description of the proposed change and an explanation of why the change is being considered or proposed. Where options are being consulted on, these are set out in the description of the change.*”

KcCPC is concerned that this style may imbue proposals so made with an undue degree of ambiguity that has been exploited in prior development proposals to the benefit of the applicant.

(2.1.5) KcCPC is concerned that as has happened in previous consultations, SZC Co. considers it appropriate to bring forward consultation material lacking complete Environmental Impact Assessments.

As is evident from previous attempts to deploy this strategy, it seldom provides a sound basis for informed decision making and often leads to further significant changes.

### 2.2 Freight Management Strategy

(2.2.2) KcCPC again note with incredulity SZC Co.’s previously made assertion that they had worked to find the “... *most sustainable freight management strategy and... include a comprehensive set of mitigation measures...*” despite having ruled out options without the fullest of examinations or seemingly on the basis of direct cost, rather than looking at the potential direct and indirect benefits as well (i.e. financial, environmental, social and welfare, etc.).

So, it is with some irony that SCZ Co. has chosen now to bring back previously dismissed options (i.e. extended BLF and more heavier rail movements).

More concerning is that after eight or more years, some of these proposals fall far short of an actionable plan. For example an extended BLF has huge potential hurdles to overcome in respect to coastal considerations and the potential geomorphological consequences of the existing DCO proposal, let alone those being currently consulted upon.

Likewise, it is clear that the proposed rail changes may have much wider impacts than those contemplated by the option in the DCO, alongside significantly more interdependencies and potentially more significant cumulative impacts.

**(2.2.5)** KcCPC notes *“The Application forecasts that approximately 40% of construction materials (by volume) would be moved by rail or sea.”* but makes no mention of the estimated tonnage applicable.

Tonnage is of particular importance in consideration of road hauled loads (HGV & LGV) and the potential cumulative impacts on road surface and bed in both the short, medium and long terms.

KcCPC also notes that with road hauled loads dropping to 60% there may be a logistical, environmental and economic challenge to the requirement and routing of the proposed Sizewell Link Road.

KcCPC will seek a full review of the current SLR route proposal (i.e. alternative route evaluations and Peer Review, undertaken by, or for the applicant) by the Planning Inspectorate based on 60% (by volume) of forecast HGV movements, plus LGV and bus movements c

**(Table 2.2 – Rail Movements)** KcCPC have grave concerns that whilst considerable efforts are being promised to deliver *“Overnight movements along the East Suffolk line to and from hold points on the Saxmundham to Leiston branch line, and during the day movements along the Saxmundham to Leiston branch line from the hold points to and from the LEEIE, so that trains do not travel through Leiston at night.”* no consideration appears to be given to the impact of night movements on the not inconsiderable and similarly close proximity housing elsewhere (e.g. Saxmundham, Campsea Ash, etc.) and trackside leisure and residential parks (i.e. Whitearch Park).

KcCPC will seek to persuade the Planning Inspectorate to undertake a full review of the proposal for ‘Early Years’ night trains through to *“... hold points on the Saxmundham to Leiston Branch Line.”* and the inequality of treatment of trackside communities elsewhere in Coastal Suffolk (e.g. Saxmundham, Campsea Ash, etc.), compared to those residents in Leiston. c

Similarly, KcCPC will seek a full review of the revised proposal for *“When the green rail route is operational: Up to 7 overnight movements and 1 daytime movement directly to and from the temporary construction area with the potential to also run trains on Saturdays. It may be possible to run a fifth train (two additional movements) for a short period.”* on the basis that the same consideration given to Leiston residents in the ‘Early Years’ above should be applied to trackside communities for the longer period of use by trains destined for the green rail route. c

**(Table 2.2 – HGV Movements)** KcCPC have serious concerns that whilst the applicant indicates the proposed change has

*“Potential to reduce to:*

*Typical day at peak: 250 HGVs (500 movements)*

*Busiest day: 350 HGVs (700 movements)*

this seemingly only applies to HGV movements and continues to avoid any initiative to reduce LGV movements during the entire construction period.

Whilst LGV movements are widely regarded as less damaging to the road surface and bed, they are; more prevalent, arguably less well maintained, more polluting (per road tonne mile\*) and more difficult to pro-actively manage.

\*Road Transport Emission Factors (April 2020)

As a consequence of this and the experience of Hinkley Point C's construction thus far, in the event the Applicant obtains consent, KcCPC will seek to persuade the Planning Inspectorate that a binding agreement on the maximum daily permissible vehicle movements (by vehicle category, by route and construction phase) for the duration of construction should be implemented to safeguard; the health and wellbeing of coastal Suffolk residents, maintain local businesses capabilities and offer increased environmental and amenity protections. Q

**(Table 2.2 – Marine Movements)** KcCPC have concerns that subject experts and commentators continue to express significant reservations in respect to the impact of the Applicant's proposals on the marine environment and a range of issues arising from increased Marine Movements, BLFs, etc.

Whilst the Council lack knowledge in these areas, it is persuaded that the previous Marine proposals along with the most recent changes require significantly more compelling evidence than the Applicant has been able to produce thus far.

Consequently, KcCPC is unable to offer any support for the amended Marine proposals contained in the "*The Sizewell C Project, Consultation Document, Consultation on Proposed Changes, November – December 2020*" without unqualified evidence being provided by the appropriate statutory authorities that; SZC Co.'s proposals represent no material risk to the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

**(2.2.7)** KcCPC notes with regret that "*...detailed site investigation work has continued to finalise materials volumes... work is continuing and will be confirmed at the same time as any changes arising from this consultation are formally submitted to the Planning Inspectorate.*", once again meaning another consultation concerning fundamental issues (e.g. confirmed materials and the consequent HGV movements required), are devoid of robust and meaningful data. Q

KcCPC regard this as undesirable and mirroring a constant theme throughout Pre Application, reinforcing the need for a binding agreement on the maximum daily permissible vehicle movements (as per comments on Table 2.2 above).

**(2.2.8)** Ignoring the remaining uncertainty of both increased rail movements and beach landing deliveries is it the intention of SZC Co. to undertake wider consultation regarding potential impacts further afield should "*...aggregates and other materials...*" come from sources that are "*...rail connected...or which could potentially allow shipment by sea.*"? Q

KcCPC is aware that trans-boundary issues (e.g. regarding potential incidents with nuclear material at the planned Sizewell C site) have already elicited Relevant Representations from European mainland countries. Q

**(2.2.9)** Taking a lead from SZC Co.'s desire "*that goods should be moved sustainably wherever possible and that HGV numbers should be limited to those necessary for goods which cannot be moved by rail or sea.*" what is the plan for deployment of hydrogen and/or electric powered commercial and private use vehicles during the construction phase? Will SZC Co. be active in installing more public access electric charging and hydrogen stations to facilitate this deployment? Q

**(2.2.11)** KcCPC note "*SZC Co. expects that it will be possible to reduce HGV movements to levels similar to those associated with the rail-led strategy.*" and assume that the figures used in Stage 3 Table 5.1 are specifically: *Typical - 225 (450 movements) and Busiest - 450 (900 movements) between 07:30 and 23:00.*

If that is the case, KcCPC is concerned that SZC Co. are dismissive of the 50 daily movement adverse variance (Typical). However, the Council view the beneficial 200 variance as a welcome (but inadequate) step in making reductions to unacceptable HGV movement levels during the busiest periods. Q

(2.2.12) KcCPC is concerned that SZC Co. have failed to obtain rail freight capacity agreements with both the track operator and freight companies, advising instead that *'detailed discussions are continuing'*. It seems incredible that after more than eight years, fundamental dependencies have not been addressed and finalised, at least in the form of a conditional 'heads of agreement' or MOU's. Q

(2.2.13) KcCPC is gravely concerned that after more than eight years and several consultation rounds that SZC Co. have failed dismally to address fundamental issues in respect to the utilisation of the rail network, SZC Co. caveat their *"...proposals being consulted on..."* with *"It is possible that this work could conclude that the additional train capacity cannot be delivered, but SZC Co. is working..."*

Accordingly KcCPC is unable to offer support to the revised proposals contained in the *"The Sizewell C Project, Consultation Document, Consultation on Proposed Changes, November – December 2020"* as they amount to nothing more than obfuscation and continuing prevarication on critical issues likely to impact directly on Coastal Suffolk residents, their wellbeing and mental health.

(2.2.15 & 2.2.16) Whilst SZC Co. may be very clear what they are proposing in these paragraphs, they fall far short of precluding the use of *"... the permanent BLF..."* for both AIL and bulk material imports when it might be operationally beneficial and time/tidal range would permit it. Q

(2.2.17) SZC Co. once again attempt to play down the impact of the proposed changes, moving from 50 beach landings (i.e. one per week), with a 100% increase to 100 per annum (i.e. two per week).

(2.2.18) KcCPC challenge the veracity of SZC Co.'s intent when *"... the coast path could be kept open during the construction and operation of both the permanent and temporary BLFs..."* is immediately followed by *"... as far as it is reasonable practical and safe to do so."* Deployment of this type of tactic during the Pre-Application Consultations fed feelings of unease, disquiet and uncertainty in local communities. To have it used now, in a consultation that SZC Co. clearly intended to propose after the DCO Application had been made, can only be seen as illustrative of the contempt that SZC Co. has for the people of East Suffolk and their representatives. Q

(2.2.19) KcCPC note SZC Co. *"... is consulting on four variants to the temporary BLF design, each with different capacities and different effects, in order to seek views on which may be the most appropriate."* KcCPC is unable to offer any informed comment as to which variant may be the most appropriate and will only support a variant(s) that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

(2.2.20) KcCPC note the assertion from SZC Co. that *"the potential changes to rail and marine capacity could substantially reduce the number of HGV movements on local roads."* However, KcCPC regard any such unsubstantiated statement as mere conjecture, with no objective value when considering the future health of the Coastal Suffolk; coastline, ecology, economy, flora, fauna as well as residents and their health and wellbeing.

## 2.3 Main Development Site

### b) Main Platform

(2.3.1 to 2.3.14) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] more taller crane activity in more places (2.3.7, 2.3.8)
- b] the proposed marine tunnels were in the wrong place (2.3.8)

- c] new marine tunnel location also impacts ‘*temporary construction area*’ (2.3.8)
- d] new SSSI crossing design with more flood relief, less land take, better ecological connectivity...
- e] ... with potential for larger trees on new gradient embankments (2.3.9)
- f] Revision to let a ‘*temporary*’ outfall pipe discharge surface water... (2.3.12)
- g] ... to the foreshore prior to the completion of the 300 metre offshore CDO
- h] change sea defence method to; cheaper, faster, simpler, less bulky sheet-pile... (2.3.13)
- i] ... increasing the height for more resilience and less reliance on secondary measures (2.13.14)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to local communities, the coastal fabric, geomorphology and other critical facets of the East Suffolk coastline or those of neighbouring Counties.

#### **c) Sizewell B relocated facilities and National Grid Land**

(2.3.15 to 2.3.19) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] we might acquire more land from Sizewell A... (2.3.17)
- b] ... but haven’t got agreement yet (2.3.17)
- c] We have revised the layout or relocated facilities... (2.3.17)
- d] ... to be; cheaper, faster, simpler ... (2.3.17)
- e] Consulting on two options... both taking the same time to complete... (2.3.18)
- f] ... Option 1 if Sizewell A land becomes available, Option 2 if it doesn’t
- g] Option 1 relocates SZB outage parking to the current SZB Car Park West (2.3.18)
- h] Option 2 relocates SZB outage parking to the Pillbox Field (2.3.18)
- i] No reduction in the order limits apply to these changes (2.13.19)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities and that represent no material risk to local communities.

KcCPC note no reference is made to requirements for the DAC Demonstrator Project or the much publicised Hydrogen ambitions EDF have for the Sizewell site. Is this deliberate or should all agencies expect to be in receipt of yet more ‘consultations’ in the near future? 

### e) Temporary construction area

(2.3.22 to 2.3.31) Summarised, Section ii (Proposed Changes to the DCO Application) appears to say:

- a] More materials on-site in Early Years demand more stockpiling up to 15 metres high...
- b] ... will also impact main platform area (2.3.25)
- c] Storage of non-potable water revised to new location... (2.3.26)
- d] ... adjacent to attenuation pond, borrow pits and stockpiles... (2.3.26)
- e] ... releasing prior location for fluvial flood mitigation and... (2.3.26)
- f] ... the creation of additional wetlands habitat for Marsh Harrier foraging... (2.3.26)
- g] ... during construction phase... (2.3.26)
- h] Opportunity for transitioning to wet woodland identified but no commitment (2.3.27)
- i] Revisions to tree retention... never good news (2.13.28)
- j] Potential to include bridleway link within DCO rather than fund separately... (2.3.29)
- k] ... to include Lover's Lane crossing point, joining Bridleway 19 (2.3.30)
- l] Result – more Order Limit changes believed to create net increase in land take (2.3.31)

Under such circumstances KcCPC is unable to offer any informed comment and will only support outcomes that have both the unqualified support of the appropriate statutory authorities, interest groups and the local community.

### 2.5 Two Village bypass

#### c) Proposed changes to the DCO Application

(2.5.6 to 2.5.8) Summarised, appears to say:

- 1] SZC Co. has been talking with SCC and were found wanting in 'visibility' standards (2.5.6)
- 2] ... needing an increase in the land take...
- 3] ... but then again it might not, once SZC Co. has completed more necessary speed surveys
- 4] SCC have asked that the route be formalised as a PRoW (2.5.7)
- 5] ... SZC Co. are consulting on upgrading it further to a bridleway and two routing options
- 6] SZC Co. talks of an '*opportunity to use land within the Order Limits to provide additional...*
- 7] ... *habitat for the loss of floodplain grazing marsh habitat.*' But not consulted on at (2.5.8)

## 2.6 Sizewell link road

### c) Proposed changes to the DCO Application

(2.5.6 to 2.5.8) Summarised, appears to say:

- A] SZC Co. have been talking with SCC and were found wanting in 'visibility' standards (2.6.6)
- B] ... needing an increase in land take and vegetation losses...
- C] ...but then again it might not, once SZC Co. has completed more necessary speed surveys
- D] Similarly SZC Co. were found wanting in their approach to drainage (2.6.7)
- E] ... new proposals using attenuation basins and discharge to local water courses result in...
- F] ... substantial increases in land take
- G] ...but then again it might not, once SZC Co. has done the required hydraulic modelling
- H] Elsewhere on the SLR, SZC Co. have completed topographical work (2.6.8)
- I] ...incomplete during the consultation phase and also prior to the DCO Application
- J] ... leading to changes in; design, land take and the length of time land is required
- K] ...so absolute clarity on that too!

## CHAPTER 3. FREIGHT MANAGEMENT STRATEGY

### 3.1 Introduction

(3.1.2) Alas, were the issues not so serious the loose translation of SZC Co.'s *"Potential changes to rail movements from those assumed in the Application"* to a dictionary derived: *'Potential changes to rail movements from those **taken as being true for the purpose of argument or action...**'* might strike an altogether more prophetic chord with many Coastal Suffolk Parish Councils.

As has been the case throughout Pre-Application consultation, Parish Councils are once again confronted with an overabundance of *"potential"* with very little being concrete (sic). Indeed, previously unthinkable options are now being promulgated by SZC Co. as providing potential routes to *"increase train capacity"* and *"simultaneously reduce Heavy Goods Vehicle movements"*.

Like others, KcCPC have consistently asked SZC Co. to substantiate claims made throughout Pre-Application Consultation phases in the face of; little tangible evidence, sparse/incomplete data and little demonstrable 'joined up thinking'.

So, whilst SZC Co. continue to mount an increasing; political, media and PR blitz, many coastal Suffolk communities face another round of transitory hyperbole, accompanied of course by the now mandatory caveats and qualifications. The question that remains unanswered is why SZC Co. have taken nearly a decade in the planning to realise that coastal Suffolk (and much of the rest of Suffolk) does not have the infrastructure or resilience within its road network to support civil engineering projects of this scale. 

(3.1.3) It seems absurd that SZC Co. are only now unequivocal in stating it *"... has been conscious of the need to ensure that its freight management strategy optimised the sustainable transport of material by rail or sea, whilst limiting and mitigating the impacts of necessary road transport."*

Since any sort of 'can do' approach was dispensed with much early on in Pre-Application Consultation rounds, SZC Co. have been little more than dismissive of marine options *'due to environmental impacts'* and very disparaging about rail options laying blame; squarely at the door of the track owner/operator, the time to get effective engagement and their inability to get timely infrastructural remedies developed and agreed.

(3.1.4) Dubbing a basket of un-associated components as *'integrated'* is nothing more than a sloppy piece of PR spin and is tantamount to sailing oil tankers under flags of convenience. There is little to define any of the SZC Co. proposals as integrated, although collectively they may deliver what SZC Co. has set out to achieve... for their own ends.

Integration is a far more refined concept than that portrayed by SZC Co. during the last few years. For example, reflect on the intricacy of an 'integrated circuit' or the sophisticated systems required to build integrated mass transit networks.

It is a misnomer for SZC Co. to think that they have achieved any form of integration in respect to their freight management strategy. Moreover, it is wilfully misleading to continue to portray it as such to the public. 

(3.1.5) KcCPC once again draw SZC Co.'s attention to one of many inconsistencies identified in both Pre-Application and Post Application Consultation documents. Specifically, in this case KcCPC is concerned at the use (or abuse through interchangeability) of both *"weight"* and *"volume"* with regard to freight percentages, construction materials, etc.

As an engineering company SZC Co. are no doubt aware of the difference between the two terms, leading the Council to conclude that they are either deliberately using both (simultaneously within the same document) to confuse the

unaware reader or alternatively, to enable a more favourable portrayal of their proposals in sensitive areas of public concern (i.e. traffic movements). Q

(3.1.6) KcCPC have identified that SZC Co.'s liberal use of the term *"sustainable"* in both the Pre-Application and Post Application Consultation documents maybe context sensitive and thereby open to interpretation.

Given the critical nature of the impacts SZC Co. are proposing to inflict on coastal Suffolk's; economy, residents, businesses, visitors, ecosystems, flora, fauna and environment it is of continuing concern that no agreed definition(s) appear. If this is an oversight, it should be rectified. If it is deliberate, SZC Co. should provide one definition or more, if context applicable variants exist, prior to progressing with the Application through the Planning Inspectorate? Q

(3.1.7) KcCPC is concerned that whilst *"...detailed site investigation work has continued to finalise materials volumes..."* has continued beyond submission of the Application, SZC Co. do not intend to make the results available and confirmed until *"any DCO changes arising from this consultation are formally requested."*

This approach is symptomatic of the lack of respect SZC Co. appear to have for consultees, particularly as this information may have a significant bearing on the anticipated; traffic, rail and/or sea movements. Is the reality that SZC Co. already understands the likely outcome and is reluctant to make public the degree of movements that will be necessary to *"export"* excavated materials from the site? Q

(3.1.8) So, it seems if you engage experts to look at logistics and materials handling and procurement, they very rapidly come to the conclusion that *"aggregates and other materials from sources which are rail connected or... potentially allow shipment by sea."* are not only potentially viable but may also be preferable to road haulage!

This revelation begs the question, why weren't these fundamental issues dealt with at the outset? Q

(3.1.9) Consequently, it seems that SZC Co., enjoying a timeline largely of their design can still only muster;

*"This work has resulted in two potential changes..."*

*"potential to run 4 or possibly even 5 trains per day for a short period, 5 or 6 days a week;..."*

*"potential options for a new temporary BLF to increase the capacity..."*

The reality is SZC Co. have kept coastal Suffolk dangling on a chain with a stream of inconsistent thinking, essentially playing a game with people's lives and emotions to the detriment of the health and wellbeing of local communities. All of this before the Planning Inspectorate has barely been able to review the original Application. Furthermore, this is a company claiming to be working to minimise impacts on local communities... Q

(3.1.11) KcCPC note that *"SZC Co. shares the objectives of stakeholders and the local community that goods should be moved sustainably wherever possible and that HGV numbers should be limited..."* and the assertion that their contractors *"also strongly favour the use of rail and sea...because it can be highly efficient, reliable and cost effective."*

Despite this, KcCPC again wish to make the point that SZC Co.'s actions do little to demonstrate that this is their foremost in their considerations, particularly when considered in combination with seemingly indifferent attitudes on the volume and management of LGV movements and the additional 10,000 forecast daily car movements in, out and around the coastal Suffolk area.

(3.1.12) KcCPC note Table 3.1 and the paucity of qualitative or quantitative information that it gives the reader.

Once again SZC Co. has provided an illustration of their continuing unwillingness to adequately **evidence** assertions made in their Consultation documents.

Consequently, KcCPC are again forced to express their gravest concern at SZC Co.'s refusal to provide consultees and impacted communities with satisfactory levels of clarity and underpinning data. Q

KcCPC also note (reinforcing a previous question) that neither volume nor weight is designated as the unit of measurement in this table. So, is this volume or weight...or perhaps it is a percentage of something completely different? Please provide clarity as to what is being portrayed. Q

**(3.1.13)** KcCPC note “... there is a significant **volume** of material which will require transport by HGV.” and “... HGV is defined in the Application as any goods vehicle over 3.5 tonnes”. The Council also note HGV is omitted from Defined Terms on (Pages 172 -4).

On the basis that HGV vehicles are as categorised above, the Council seek confirmation that all HGV's will be subject to active routing management by SZC Co. into and away from the construction area. Q

**(3.1.14)** Due to the lack of purposeful data being provided in Table 3.1 (see question above), KcCPC are unable to fully understand why the upper range (percent) for Rail and Sea cannot be achieved both individually and collectively.

The Council notes “... material moved by HGV is unlikely to be less than 40% of the total as this proportion of materials is best suited to road transportation.” but once again is unable to fully understand why, largely because of the scarcity of relevant information.

In that context, KcCPC regret that the **unstated option of 80% being achievable by Rail and Sea**, whilst it may exist appears to have been precipitously dismissed by SZC Co. without adequate explanation.

Can SZC Co. explain why the dismissal of an option to potentially leave just a residual 20% dependent on road transport has not been more fully explained, along with any underpinning data? Q

KcCPC note that Table 3.1 and Para 3.1.14 deal with the “**volume**” of materials, whilst Paras 3.2.4 & 3.2.5 exclusively use **weight** (specifically tonnes). Why is this inconsistency introduced and how does it provide the consultee with clarity when reading SZC Co.'s Consultation documentation. Q

KcCPC presume SZC Co. is aware these terms are incompatible and not interchangeable? Q

**(3.1.15)** KcCPC note SZC Co.'s assertion that “A balance also needs to be struck between the benefits and the environmental effects of the different transport options in order to arrive at the optimum freight management final strategy.”

In the absence of this being developed further in this document now or previously, the Council asks for SZC Co. to provide full disclosure of the tools and data being used to assess the “... the benefits and the environmental effects...” alongside the decision support matrix and methodology from which the derived best case “balance” has been obtained. Q

**(3.1.17)** KcCPC note SZC Co.'s assertion that “The outcome from this consultation will assist SZC Co. to find the optimum strategy...”

In the absence of this being developed, the Council asks for SZC Co. to provide full disclosure of the tools and data being used to assess the “... the optimum strategy ...” alongside the decision support matrix and methodology from which the derived best case “optimum strategy” will be obtained. Q

### 3.2 Increase in the frequency of freight train movements to facilitate bulk materials imports by rail

#### a) Potential changes to rail movements assumed in the DCO Application

(3.2.1) For the avoidance of doubt, *“In the early years, rail operations would...”* is understood to mean Years 1 & 2 of the Project. SZC Co. is asked to confirm this. Q

Assuming this is confirmed it is unclear when the upgrade to *“the Saxmundham to Leiston branch line”* and construction of the *“newly constructed sidings in the LEEIE”* would occur. When is this specifically and how will inbound materials and outbound waste for this construction be transported? Q

KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“... No trains would travel through Leiston at night.”* inferring that trains will travel past other communities in similarly close proximity to the track at night. What rationale do SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

The Council also note *“... the trains would leave LEEIE in the evening, be held again on the branch line and then return to the main East Suffolk Line at night.”* inferring that trains will travel past other communities in similarly close proximity to the track at night. Again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality?

(3.2.2) It is noted that *“The green rail route is expected to be constructed and operational within the first two years of the Sizewell C Project...”* and the Council would like to receive confirmation that the works described in Para 3.2.1 are capable of being completed in parallel with construction of the Green Rail Route without placing an inordinate HGV load on the A12/B1122 (or any other route). Q

KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“The Application anticipates that these train movements would predominantly happen at night.”* inferring that trains will continue to travel past communities (other than Leiston) in similarly close proximity to the track at night. What rationale does SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

(3.2.4) KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, the Council note *“three trains would be likely to arrive in the early morning (before 07:00)”* inferring that trains will continue to travel past communities (other than Leiston) in similarly close proximity to the track at night. What rationale does SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

The Council note *“... it was assumed that five of these rail movements (three inbound and two outbound) would happen at night (defined as between 23:00 and 07:00) and one would happen during the day (i.e. after 07:00).”* inferring that trains will travel past other communities (other than Leiston) in similarly close proximity to the track, at night. Again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

(3.2.5) KcCPC note that SZC Co. is still unable to give certainty in respect to the constitution of the proposed freight trains, caveating their latest thinking with *“... capacities need to be confirmed through continuing engagement with Network Rail”*.

SZC Co. then continues *“... each train is equivalent to that of 67.5 HGVs (135 two-way HGV movements)”*

KcCPC believe this para is misleading and with regard to previous SZC Co. briefing, should instead read *“... each train is equivalent to that of 67.5 HGVs (135 HGV movements)”*, **not** so-called *“two-way movements”*. Q

## b) The potential to increase rail capacity

**(3.2.6)** KcCPC notes SZC Co.'s continuing "...detailed discussions with Network Rail and with freight operating companies" and their assertion that there is identified potential to increase both overnight and six day week (Monday to Saturday) train movements.

Once again, KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, with growing disquiet the Council note the potential for SZC Co. to bring forward proposals to run more trains day and night, six days a week, requiring that trains must travel past communities (other than Leiston) but in similarly close proximity to the track.

Once again the Council must insist that SZC Co. is compelled to publicly disclose how treating similar proximity trackside communities with such blatant inequality can be justified? 

**(3.2.7)** KcCPC is concerned that SZC Co. continue to bring forward for consultation an ever increasing number of variants to their proposals with negligible evidence they are achievable, little or no base data, scant information as to how they might be achieved, at what cost to the environment, locality, etc. and with what impact.

In this respect and despite the last sentence of Para 3.2.7, the Council is concerned that this eleventh hour consultation is little more than a thinly disguised vehicle to enable SZC Co.'s embryonic thinking to pass the "... we have consulted hurdle..." and mollify stakeholders. 

**(3.2.8)** Once again, KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered. Consequently, with increasing angst the Council note the potential for SZC Co. to bring forward proposals to run even more trains day and night requiring that trains must travel through communities (other than Leiston which seems to have special protection) in similarly close proximity to the track.

Once again the Council must insist SZC Co. publicly disclose how treating similar proximity trackside communities with such blatant inequality can ever be justified? 

**(3.2.9)** This paragraph is akin to a catch-all, with so much uncertainty, diverse elements and caveats, as to make it virtually incomprehensible. KcCPC do not believe it provides a sound basis on which the Council would wish to provide any feedback other than outright opposition to; ongoing, incomplete, unclear, heavily nuanced outlines that seemingly have little or no structured analysis and don't appear to have the unequivocal support of the necessary parties to enable effective and timely delivery.

**(3.2.11)** KcCPC note table 3.2, not for the depth of information that it contains, but for confirmation that SZC Co. are indeed anticipating a construction period over (the widely predicted) 12 years i.e. 2022 through to 2034.

The Council ask SZC Co. to drop the pretence that construction will be between 9-12 years and publicly acknowledge that coastal Suffolk will be a building site for at least 12 years? 

**(3.2.12)** KcCPC is confounded by another pair of vacuous statements from SZC Co. specifically; "... it is assumed that the loading capacity of trains cannot be improved..." and "it would not be appropriate at this stage, however, to assume that each train could increase its payload." and then concluding the paragraph with "Any increase in payload, of course, would generate further direct savings of HGV movements."

Can SZC Co. explain why a paragraph of this consultation is wasted with what can only be described as speculation? Is this the level of regard SZC Co. have for Local Authority staff and residents time under Tier 2 lockdown, in the run up to the much anticipated festive season?

Alternatively is it included to enable SZC Co. to increase train payloads over the duration of the proposed project without having to seek a variation to the DCO? Q

**c) Potential for HGV reductions**

**i. Potential for HGV reductions from additional rail movements**

**(3.2.13)** KcCPC note the 18.5 tonne payload anticipated by SZC Co. for the HGV fleet and the inference that this is unlikely to be the average payload as they anticipate “...that the HGV fleet could include a proportion of larger vehicles.”

Why have SZC Co. not provided a quantification of the estimated; volume, density and weight “of larger vehicles” and their likely distribution through the construction period? Q

**(3.2.14)** KcCPC note the SZC assertion that “...each train movement (with its assumed pay load of 1,250 tonnes) would result in a reduction of 67.5 HGV deliveries...”

SZC Co. then continue “or 135 two-way HGV movements.”

KcCPC believe this para is misleading and with regard to previous SZC Co. briefing, should read “... each train is equivalent to that of 67.5 HGV deliveries, or **135 HGV movements**”, not the so-called “two-way HGV movements”. Q

**(3.2.15)** KcCPC note that as in previous consultation, SZC Co. have again failed to declare the total anticipated HGV movements for completion of the proposed Sizewell C power station. Instead they hypothesise (from an undeclared base) on the potential reduction in HGV movements on the A12 likely to occur as a result of (as yet unconfirmed) rail and sea delivery proposals.

Consequently it seems all stakeholders will remain in the dark in respect to fundamental issues that will impact coastal Suffolk for 12 years or more.

KcCPC do also have concerns about the figures quoted in Para 3.2.15, specifically:

203 HGV deliveries per day x 5 days = 1,015 per week

52 weeks per year (maximum achievable) x 1,015 deliveries per week = **52,780 not SZC Co.'s claimed 57,980**

SZC Co. advantageous variance = 57,980 – 52,780 = **5,200 HGV deliveries**

How do SZC Co. account for an advantageous variance in excess of 5 days, not directly divisible by 1,015? Q

**(3.2.16)** KcCPC oppose proposals that see East Suffolk’s trackside communities exposed to the undue disturbance created by night train movements (as discussed in this response earlier) and that SZC Co. have deliberately avoided inflicting on the community of Sizewell.

Once again the Council want to know what rationale SZC Co. use to justify treating similar trackside communities with such blatant inequality? Q

For the avoidance of doubt, noting the SZC Co. attestation that “It is possible that train services could run six days a week (Monday to Saturday), although seven days a week is not proposed.” KcCPC make it clear it would also oppose any attempt by SZC Co. to run freight on Sundays and is deeply concerned at the potential disruption to people’s lives, especially at night and through the weekend. Q

**(3.2.17)** KcCPC notes Table 3.3 but find it less than informative

**(3.2.18)** Reference is made to “*To assist with this, the potential environmental effects of the increased train activity are summarised further, alongside a description of the environmental benefits of reduced HGV movements (see section 3.4 of this chapter).*”

There appears to be no section 3.4, should the reference be to Table 3.5? ■

#### **ii. Potential for HGV reductions from an increase in the transport of materials by sea**

**(3.2.19)** The Council acknowledge SZC Co.’s stated desire to achieve a balance between rail, sea and road and are interested to understand what methodology and key drivers are currently being used by the applicant to determine the “... the optimum balance...”? ■

Should SZC receive approval, KcCPC regard the optimum balance to be that which (not exclusively);

- 1] safeguards all of the onshore and offshore ecological, heritage and environmental assets of coastal Suffolk
- 2] respects and recognises the importance of the physical and mental health and wellbeing of residents, visitors and holidaymakers
- 3] understands the needs of local businesses (i.e. within 20 miles of Sizewell) and works hard to ensure their stability, viability and continuity of their skilled staff, without unnecessarily depleting their labour pool
- 4] ensures Suffolk residents and businesses feel assured that the SZC Project respects and values their views
- 5] takes all necessary steps to ensure that the very limited infrastructural assets (road, rail, communications, schools, hospitals, clinics, etc.) within coastal Suffolk are prioritised for the use of residents, local businesses, visitors and holidaymakers, thereby reducing the overall impact of the SZC Project on the daily needs of these stakeholders.

**(3.2.20)** Whilst KcCPC understand why SZC Co. are expressing the “... *alternative or additional potential...*” as HGV equivalents. However, the facts are that no rail or sea option appears to be more than hypothetical at this point in time and therefore of little tangible value to a substantial portion of an increasingly beleaguered coastal Suffolk population.

The stark reality is that SZC Co. have spent the past decade developing their plans based on exploiting the single infrastructural asset that costs them the least to utilise – more specifically, the already inadequate road infrastructure that can best be described as one ‘heavily clotted artery’ (the A12), that rapidly dissipates into a network of unpaved roads and lanes, often incapable of safely carrying traffic larger than a LGV.

As a consequence, the SZC Co. starting point has always been focused on HGV and other road based vehicles, rather than SZC Co. acting as a catalyst for collaborative investment in alternative infrastructure that could have formed a long lasting legacy to coastal Suffolk and increased opportunities for the development of engineering and energy synergetic centres of excellence in the surrounding region.

Had SZC Co. spent the time more constructively (sic), working with partners to eradicate the use of traditional infrastructure and bringing forward a more progressive agenda to deliver the Sizewell Project, not only could they demonstrate a ‘lighter touch’, they might also have carried more local opinion with them! The question is why SZC Co. clings on so tightly to *HGV movements* as their ‘*lingua franca*’ and in doing so does it advance the debate? ■

**(3.2.21)** The Council suggest that “... *HGV savings they would generate, however, can fairly be averaged across the year.*” whilst arithmetically correct may not be the case in respect to the number of HGV’s necessary at any particular point

in time to meet demand for specific materials (even with onsite storage) that are undeliverable because of weather conditions at sea and the limited use of the rail network. C

**(3.2.22)** As suggested at 3.2.21 above, another reason for not averaging potential HGV reductions across the year is that SZC Co. may decide that if 'sea based' deliveries generate a window of opportunity, then it may be better for them to reduce the number of trains required rather than HGV movements. C

Should SZC Co. be granted a DCO and taking on board this type of potential situation, the Council are minded to ask the Planning Inspectorate to consider the imposition of daily maxima for movements across all freight modes (i.e. HGV, Rail and Sea movements) throughout the entire construction phase of the project.

In doing so, the intention of the Council is to;

- a) mitigate the risk observed at Hinkley Point C where almost immediately after being granted a DCO an increase in the utilisation of HGV movements was sought
- b) make certain that SZC Co. undertake adequate detailed pre-initiation planning to fully safeguard coastal Suffolk against any impacts of inadequate planning or unforeseen consequences arising in a project of this magnitude.
- c) ensure that 'inflight' project decision making is undertaken in the round, considering not just the impact on the construction timetable, but also the impacts on the locality and its residents (i.e. from entry onto the A12 through to the construction site(s)).

The Council believe this will not be disadvantageous to SZC Co. (if their application is granted) as within the paragraph they themselves emphasise *"The balance to be struck between rail, sea and road capacity will require careful planning ... and the profile of demand for construction materials over the construction period."* C

KcCPC note at bullet point three, SZC Co. identify *"... there is potential to import infill material from marine sources."* and are concerned that this may be a prelude to marine dredging off the Suffolk coast, as has occurred in the West Country during the construction of Hinkley Point C.

Therefore, the Council seek a categorical guarantee from SZC Co. that there will be no marine dredging initiated by them (or their suppliers/contractors) for the purpose of obtaining construction material, within a 50 mile radius of the proposed Sizewell C development.

**(3.2.23)** As discussed in the previous paragraphs, whilst the Council understand that SZC Co. may need to exercise some flexibility in their materials handling strategy, the environment, residents and businesses must be safeguarded from the worst excesses of expediency.

In order to mitigate these risks the Council will again seek the imposition of daily modal maxima for the duration of the construction phase. To reinforce careful planning and the exercising of sound management controls the Council will further suggest that the Planning Inspectorate consider setting the maxima at a threshold below the "Typical and Busiest Day" figures used by SZC Co. in the DCO Application. Initially this might reasonably be set at -15%, subject to six monthly review by the Planning Authority. C

**(3.2.24)** As the variables involved in calculating the impacts on each modal option are numerous and SZC Co. are unable to commit to anything with a degree of certainty, KcCPC can only note the various hypotheses. To do more on the basis of the information provided would only be speculation and not form a solid foundation on which to express a preference. C

(3.2.25) KcCPC note SZC Co. are still working through “...all these matters...” and are only able to provide an “... estimation of how these options might affect overall HGV numbers during the peak period... whilst “... rail and sea infrastructure would not be in place early enough to affect the early years HGV numbers...”.

The Council regard this as a deplorable situation created solely by SZC Co. after; concluding their Pre-Application Consultations, making their DCO Application and their insistence that a further consultation be undertaken after Relevant Representations were published. Q

(3.2.27) KcCPC note SZC Co. is adamant “... there will always be a core of material that needs to be moved by HGV” but aside from the scant summary in Table 3.1 they have never quantified what this minimum case might be. Q

The Council regard Table 3.1 as potentially demonstrating the minimum materials deliveries that can only be fulfilled by HGV (i.e. “concrete powders”).

Irrespective of whether this view reflects the reality and complexities, the table still doesn’t quantify the estimated total concrete powders involved (by volume or weight) for completion of all the construction works. Consequently, it too provides an unsound basis on which the Council could form an opinion. Q

(3.2.28) KcCPC regard SZC Co.’s assertion that “... we set out a potential rail-led option which was widely supported by consultees but which has proven not to be deliverable...” as tantamount to claim it is humane to offer the condemned man a choice between being hung or shot! Q

What is more pertinent is that the proffered potential rail-led option “...showed the lowest HGV generation...”, something SZC Co. should have been more mindful of during their rushed development of the Stage 4 Pre-Application Consultation.

Table 3.4 alludes to outcomes that “...could produce a similarly reduced level of HGV movements...”. That too is not entirely true insofar as; the ‘Typical Day best’ is still 10% higher, with the ‘Busiest Day best’ seemingly just achieving parity.

(3.2.29) KcCPC have no expertise or source of reliable knowledge in respect to the issues arising from SZC Co.’s “... marine options and their potential effects...”. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies and other expert witnesses who may respond to this consultation.

However, the Council is concerned that previously SZC Co. has expressed the view that marine fulfilment would necessitate unacceptable levels of damage to the marine environment. In this context they are concerned that SZC Co. does not appear to have explicitly explained how this damage has been avoided? Q

(3.2.30) See comments at 3.2.22 and 3.2.29 above

(3.2.31) See comments at 3.2.22 and 3.2.29 above

#### **d) Environmental impact of the additional rail movements and reduced HGVs**

##### **i. Preliminary environmental information (PEI)**

(3.2.32) KcCPC note that “Table 3.5 ... provides a summary of the preliminary environmental assessments by reference to the Application It also sets out further work to be undertaken to confirm the environmental impact of the potential changes, if changes are confirmed to be taken forward.”, implying minimal work has been undertaken prior to making the request for an additional consultation.

The Council regards this as further evidence of SZC Co. taking unnecessary shortcuts to expedite the progress of their Application for a DCO. This is particularly concerning as parts of the original impact assessment were outstanding at the point the DCO Application was made, as well as when this additional consultation was requested. C

**Table 3.5** KcCPC note the following with grave concern;

**Rail Passengers** – the disruption/loss of passenger services on the East Suffolk line to accommodate a fifth train

**Early Years** – *“potential enhancements in rail and marine would not be in place... during the early years.”*

**Traffic** – *“The potential HGV reduction at peak construction as a result of the additional trains is unlikely to materially...*

- *change the effect on severance and pedestrian delay*
- *the effect on driver delay*

However SZC Co. think it is likely to reduce the previously identified effect on amenity, fear and intimidation by reducing the proportion of HGV traffic. They also claim it would also enhance road safety.

The Council is also astonished to learn SZC Co. have concluded that *“...fewer HGVs on the road network as a result of the additional trains is expected to lead to a reduction in road traffic along the proposed HGV routes”*

## CHAPTER 4. MAIN DEVELOPMENT SITE

### 4.1 Introduction

(4.2.3) KcCPC are gratified to see that ideas promoted by the Council in earlier consultations have, although late in the day, led SZC Co. to examine re-use of available land, both within their own estate and also in the neighbouring Sizewell A estate.

However, KcCPC are very concerned that announcements vis potentially more varied activities being sited at Sizewell that have no prominence in this latest consultation, specifically;

- A] A 'Direct Air Capture' Project Demonstrator (DAC)
- B] A 'Green Hydrogen' Project

As a result the Council are concerned that land potentially made available above may get consumed by activities other than those being proposed in the DCO. ■

### 4.4 Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk

(4.4.6) KcCPC are concerned that although SZC Co. say *"The flood mitigation area and wetland habitats would be constructed very early in the construction phase"* there is no clarity as to; what 'very early' means, any relevant dependencies, any interdependencies, etc.

Consequently, the Council questions what value they should place on such an imprecise undertaking, if any? ■

**Figures 4.9 & 4.10** KcCPC note the use of an LGV in the illustrations, presumably to put context into the scale of the SSSI crossing proposal. The Council believes this is to be a vain attempt to distort people's perception of what is fundamentally a disproportionately large 'man made intervention' in a precious and treasured environment.

Like many tables, maps and figures used by SZC Co. during Pre-Application this is another unnecessary and unworthy tactic aimed at portraying SZC Co.'s proposal in the least damaging or most favourable light, dependent on your viewpoint! ■

### 4.6 Revisions to tree retention on the main development site

(4.6.1) Whilst candour is an admirable characteristic much of the time, sometimes it is misjudged specifically; *"whilst efforts have been made to retain existing vegetation where practicable, development proposals of this magnitude would inevitably result in wholesale changes to the existing landscape fabric with large-scale effects during the construction period."*

Is it unreasonable to expect SZC Co. to respect impacted parties and their love for the landscapes in and around an AONB?

#### **4.8 Change to the sea defence to make the scheme more efficient and resilient to climate change**

##### **a) The proposed development in the Application**

**(4.6.1)** KcCPC have no expertise or source of reliable knowledge in respect to the issues arising from SZC Co.'s proposed changes to the sea defences. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies and other expert witnesses who may respond to this consultation.

However, the Council is concerned that previously SZC Co. has expressed the view that having taken expert advice, their previous sea defence proposals were more than adequate to deal with the worst excesses of climate change and the consequent rises in sea levels in and around the coastal Suffolk area.

In this context KcCPC is concerned that SZC Co. does not appear to have explicitly explained why the proposed changes have become so pressing and presumably a major motivation for seeking another consultation prior to examination by the Planning Inspectorate? 

## CHAPTER 5. ASSOCIATED DEVELOPMENT

### 5.2 Southern park and ride at Wickham Market - Extension of landscaped bund and other minor changes

#### i) Extension to north-west landscape bund

(5.2.7) KcCPC note the extension to the bund adjacent to the north-west boundary and notification that the *“proposed change would ensure that the bund runs alongside the access to and from the TIMA.”*

In noting this change the Council seek clarification on issues regarding the TIMA and its operation, not previously adequately addressed by SZC Co., specifically:

- i] the planned capacity of the TIMA in respect to, HGV, LGV and presumably any AIL impacted by an incident? Q
- ii] whether HGV, LGV and AIL's approaching the main site from the north of Yoxford would be diverted south on the A12 to the Southern Park & Ride's TIMA in the event of an incident and if so, what those incidents might include? Q
- iii] if there are no circumstances in which the measures described in ii (above) would be invoked, where do SZC Co. plan to lay-up HGV, LGV and AIL's approaching the site from the north of Yoxford? Q
- iv] in the event of an incident on the A12 above the Southern Park & Ride's TIMA (but prior to the SLR), where do SZC Co. plan to facilitate 'turn back manoeuvring' of HGV, LGV and AIL's movements? Q
- v] in the event of an incident at any point on the SLR what plans do SZC Co. have planned to facilitate either;
  - a) 'turn back manoeuvring' of HGV, LGV and AIL's movements Q
  - b) 'lay-up' of HGV, LGV and AIL's movements? Q
  - c] diversion off the SLR and onto the B1122 through Middleton & Theberton Q

In the event of SZC bound LGVs HGVs or an AIL (or AILs) fouling any part of the A12, SLR or any other public highway in coastal Suffolk, will SZC Co. have any proactive response to aid the emergency services? Q

What are the key decision making criteria for invoking any of these potential remedies (and others if they exist) and what protocols will be observed? Q

How will SZC Co. distinguish SZC construction traffic from 'public' vehicles and what protocols will be observed to ensure that the public are not unintentionally or unnecessarily part of a HGV, LGV and AIL's lay-up? Q

### 5.3 Sizewell link road - Extension to and reduction of the Order Limits

#### a) Introduction

(5.3.1) KcCPC are disappointed that despite a fairly bullish portrayal of the potential for reducing HGV movements through new rail and sea initiatives, SZC Co. appear to have overlooked the potential impact these reductions might have on the efficacy and economic cost of the proposed SLR.

The Council have reflected on;

- A] the opaque information provided by SZC Co. in respect to their criteria and processes for finding the proposed route as the most suitable Q
- B] the less than transparent ‘peer review’ undertaken to seek confirmation of their choice Q
- C] the marked lack of enthusiasm shown by SZC Co. to collaborate in bringing an enduring and more effective solution to fruition that would enhance the lives of coastal Suffolk residents, businesses, visitors and holidaymakers Q

It is a continuing concern of the Council that the proposed SLR potentially brings an enormous volume of construction traffic unnecessarily so far north on the A12 prior to routing it onto a uniquely ‘Sizewell centric’ link road coined by some communities as “a road to nowhere”. Q

In essence this proposal struggles to make environmental sense with a huge increase in HGV miles being incurred by having to go north to the KcCPC border with Yoxford, prior to turning east across some of the best farming land in the area, rich with habitats conducive to a wide range of flora and fauna as demonstrated by nearby roadside nature reserves and natural ponds brimming with scarce and threatened species. Q

Consequently, KcCPC will be asking the Planning Inspectorate to:

- a) examine the methods by which SZC Co. derived the proposed route as the most suitable
- b) examine the underpinning criteria and data used in reaching the final decision
- c) examine the ‘peer review’ for its efficacy
- d) examine the impact of the proposed/potential reductions in HGV movements on the ‘justifications’ pertaining to the proposed SLR route

**(5.3.9)** KcCPC are concerned that in seeking to make changes to *“to provide increased visibility at junctions proposed along the Sizewell link road for highway safety in accordance with the design speed of 60mph.”* there are unforeseen consequences that will have a significant detrimental impact on road safety, a nature reserve, two roadside nature reserves, important verge and hedgerow habitats, agricultural traffic, non-designated heritage assets, Kelsale Village Conservation Area, public amenity space enjoyed through a network of unpaved single track lanes hosting walkers, joggers, horse riders, etc. Q

These have previously been advised to SZC Co. through the consultation process. Nevertheless, at best they remain unaddressed, at worst they are further exacerbated by the most recent proposed changes. Q

Consequently, the Council will be asking the Planning Inspectorate to examine in depth the impact the proposals for Fordley Road access from the SLR will have on a large network of single track unpaved lanes and the adjacent residents and businesses. Q

**(5.3.10)** KcCPC are concerned at the increasing amount of quality farming land that is being sought by SZC Co. to make good insufficient drainage arrangements that were previously inadequately investigated prior to both the selection of this route as the best option and subsequently the submission of the DCO Application.

The Council’s prior comments on the suitability of the proposed route for the SLR in 5.3.1 (above) are equally applicable to issues arising from the inadequate research undertaken by SZC Co. and KcCPC will be asking the Planning Inspectorate to investigate this and other facets where deficiencies are evident, during the their examination.

**(Figures 5.4 thro’ 5.9)** The Council are concerned at the ratio of Order Limit Extension as opposed to Order Limit Reductions in respect of SZC Co.’s new proposals for the SLR.

This imbalance is clear when considering the figures provided by SZC Co. (5.4 to 5.9 inclusive) and raises a question about exactly how much additional land is being taken for what purpose and is it absolutely necessary? **Q**

Kelsale-cum-Carlton Parish Council's review of SZC Co.'s 30 day Public Consultation (18th November to 18th December 2020) ends.