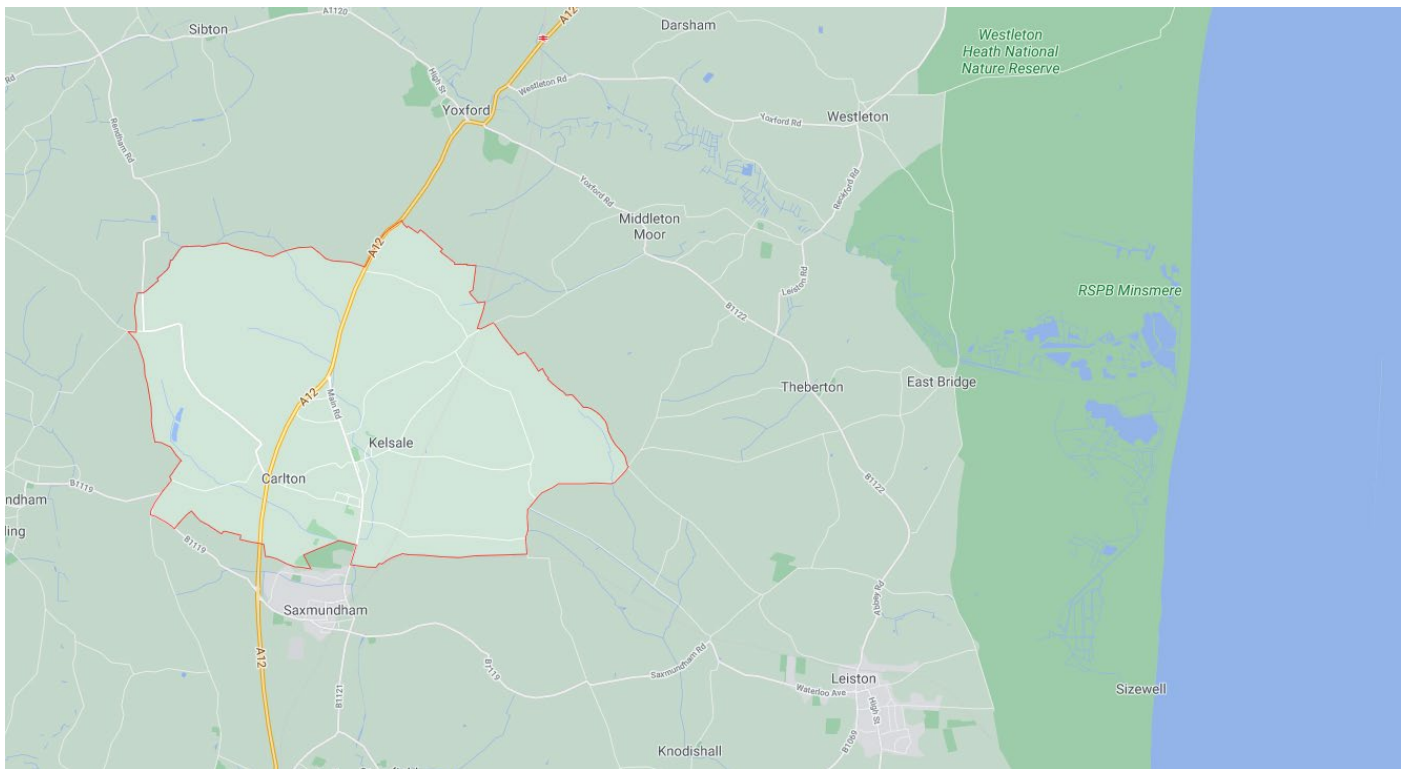


Kelsale-cum-Carlton Parish Council's response to SZC Co.'s Consultation on Proposed Changes (Nov-Dec 2020)



FOREWORD

Over nearly a decade, Kelsale-cum-Carlton Parish Council has participated fully and tirelessly in Pre-Application Consultations arising from the Application for a Development Consent Order to build a new power station on the Suffolk coast east of Leiston, comprising two largely untested new nuclear UK EPR reactors.

Over this time, the Council has been forced to move its position to one of outright opposition to the proposals being brought forward, initially by EDF Energy and now by NNB Generation Company (SZC) referred to hereafter as SZC Co.

The Council's opposition is founded on six key considerations that have remained largely unanswered for the duration of the Pre-Application:

- A] the fragility of the road network in East Suffolk and the singular lack of resilience
- B] the volume of; construction, contractor, supplier and employee vehicle movements over a period of up to 12 years, necessary to construct the proposed power station
- C] the invasive nature of the proposals in an area rich in ecological assets including; Minsmere, the AONB, well stewarded good quality agricultural land, a wide range of onshore and offshore habitats, plus numerous species of mammals, birds, reptiles, insects, plants and marine life.
- D] the attendant pollutants that significant construction projects bring, not just to the immediacy but to large swathes of Suffolk and neighbouring counties. These include; noxious airborne pollutants that are injurious to physical health, as well as; others injurious to mental health, amenity, flora and fauna and peaceful enjoyment i.e., noise, smell, light, dust, etc.
- E] the significant destabilising impact of the project on the growing Suffolk tourist economy for a period likely to be well in excess of the construction period, with direct employment impacts and established supply chains also being adversely impacted.
- F] the wide-ranging 'perils' (both large and small) that construction of this magnitude can bring to coastal Suffolk, Suffolk and the surrounding counties. In particular, there are those identified already by SZC Co. (i.e., severance, intimidation by traffic, road delays, road safety, etc.) and others not so visible including; physical health and wellbeing, loss of employees to SZC Co. destabilising local businesses and impacting dependent individuals and businesses, isolation, fear, mental health, access to services, impacts on the day to day lives of residents through congestion, rat-runs, fly parking, travel disruption, etc.

Additionally, the Council has also considered the experience at Hinkley Point C where amongst many other smaller factors it seems that; close proximity to the M5 has eased some access issues and the construction of a jetty has alleviated some significant road pressures.

Consequently, the Council is disappointed that whilst SZC Co. has seemingly injected some urgency into getting to grips with fundamental issues raised many years ago, there is a huge gulf between the heavily caveated "opportunities, possibilities and potential" laid out in this consultation and the necessary reassurance and commitment KcCPC were hoping to see.

Cllr Edwina Galloway – Vice Chair and Sizewell Portfolio Lead

Executive Summary

This is an Executive Summary of the review undertaken by Kelsale-cum-Carlton Parish Council of SZC Co.'s 30-day consultation held between 18th November and 18th December 2020.

A full commentary (where appropriate) can be found in the accompanying document entitled “Kelsale-cum-Carlton Parish Council’s response to SZC Co.’s Consultation on Proposed Changes (Nov-Dec 2020)”.

In undertaking this review the Council were asked to comment on eighteen (18) items SZC Co. have brought forward since submitting their Application for a Development Consent Order.

1. Independent Environmental Trust

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 note SZC Co. refer to the proposed Trust as an ‘opportunity’, whereas as an unconditional proposal, (assuming the project went ahead) would be 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 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?

2. Increased frequency of freight train movements

Whilst in principle KcCPC support actions that dramatically reduce SZC Co. construction traffic movements on the A12 and the associated road network, it has grave concerns in respect to the level of detail being brought forward by SZC Co. in this document.

Firstly, it seems that SZC Co. have no commitment from either the rail network operator or any potential freight operators and therefore little certainty in their proposed changes.

Secondly any revision seems to be dependent on “*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.*”

As a consequence, KcCPC are concerned that previous questions regarding the different treatment of trackside communities remain unanswered, with this change still inferring that trains will 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?

3. Enhanced permanent BLF and options for a new marine facility

Whilst in principle the Council support actions that dramatically reduce SZC Co. construction traffic movements on the A12 and the associated road network, 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.

4. Change to the SSSI crossing design

KcCPC have no expertise or source of reliable knowledge in respect to the complex issues surrounding the SSSI and those potentially arising from SZC Co.’s proposals for a changed design of the crossing. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies, expert witnesses and notable bodies who may respond to this consultation.

5. Surface water discharges to the foreshore via temporary outfall

KcCPC have no expertise or a source of reliable knowledge in respect to the marine environment and the potential impact of this change. As a consequence, the Council do not intend to make comment and will respect the views of the appropriate statutory bodies, expert witnesses and other bodies who whom have the required expertise and may respond to this consultation.

6. Change to the sea defence to make the scheme more efficient and resilient to climate change

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?

However, the Council have no expertise or a source of reliable knowledge in respect to this complex area crossing several disciplines. As a consequence, the Council do not intend to make comment and will respect the views of appropriate statutory bodies, expert witnesses and bodies or individuals who may have expertise and may respond to this consultation.

7. Greater flexibility as to where certain Sizewell B facilities are relocated to

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 regarding potentially more and varied activities being sited at Sizewell, 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.

Consequently, the Council cannot support the changes proposed by SZC Co. without clarity and reassurances regarding items A and B above.

8. Change to certain parameter heights and activities on the main development site

KcCPC are concerned that changes to parameter heights and activities on the main site may bring about additional and potentially unnecessary impacts (i.e., visual, noise, dust, etc.) to residents and visitors enjoying the amenity of Sizewell, Sizewell Beach and the broader coastal area.

As a consequence, whilst not directly impacted the Council hopes those who are, along with experts in the appropriate fields can voice their opinions and have them respected by SZC Co. and the Planning Inspectorate during the examination.

9. Change to the location of the water resource storage area and the addition of flood mitigation measures

The Council have no expertise or a source of reliable knowledge in respect to this complex area crossing several disciplines. As a consequence, the Council do not intend to make comment and will respect the views of appropriate statutory bodies, expert witnesses and bodies or individuals who may have expertise and may respond to this consultation.

However, KcCPC are concerned that although SZC Co. say at Para 4.4.6 “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?

10. Revisions to tree retention on the main development site

Whilst candour is an admirable characteristic much of the time, sometimes it is misjudged as the Council believe is the case here; *“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 biodiversity rich landscapes in and around an AONB?

However, KcCPC have no expertise or a source of reliable knowledge in respect to this involving several disciplines. As a consequence, the Council do not intend to make comment and will respect the views of appropriate statutory bodies, expert witnesses and bodies or individuals who may have expertise and may respond to this consultation.

11. A new bridleway link between Aldhurst Farm and Kenton Hills.

The Council have no comment in respect to this proposed change

12. Extension of the Order Limits to provide for additional fen meadow habitat at Pakenham

On the basis that representative groups and individuals with the appropriate knowledge and expertise confirm the wisdom and suitability of creating fen meadow at Pakenham, the Council have no comment in respect to this proposed change.

13. Extension and reduction of the Order Limits for works on the main development site and related sites (fen meadow mitigation and marsh harrier improvement sites).

On the basis that representative groups and individuals with the appropriate knowledge and expertise confirm the wisdom and suitability of the extensions and reductions, the Council have no comment in respect to these proposed changes.

14. Extension of landscaped bund, other minor changes at the southern park and ride, including a minor reduction of the Order Limits

On the basis that appropriate representative groups and individuals with the appropriate knowledge and expertise confirm the wisdom and suitability of the extension and the minor reduction, the Council have no comment in respect to these proposed changes.

15. Minor reductions to the Order Limits of the northern park and ride.

KcCPC are unable to find any reference to this change in notification to the Planning Inspectorate or Section 5.

16. Extension of the Order Limits for works on the two village bypass, change to the public rights of way around Walk Barn Farm and additional habitat mitigation proposals.

On the basis that representative groups and individuals with the appropriate knowledge and expertise confirm the wisdom and suitability of the extension and the minor reduction, the Council have no comment in respect to these proposed changes.

17. Extension to and reduction of the Order Limits for works on the Sizewell link road.

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
- B] the less than transparent 'peer review' undertaken to seek confirmation of their choice
- 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

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".

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.

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

In addition, 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.

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.

Consequently, the Council will be asking the Planning Inspectorate to examine in depth the threat of significant 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.

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

The Council's previous comments on the suitability of the proposed route for the SLR are equally applicable to issues arising from the inadequate research undertaken by SZC Co.

As a result, KcCPC will also be asking the Planning Inspectorate to investigate this and other facets where deficiencies are evident, during the course of their examination.

In respect to Figures 5.4 through to 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. KcCPC view this as an unwarranted 'land grab' to ensure that were there to be further inadequacies identified in SZC Co.'s research and analysis sufficient slack would be available for all but the biggest howlers!

18. [Minor reductions to the Order Limits for Yoxford roundabout, the A12/B1119 junction at Saxmundham and the A1094/B1069 south of Knodishall.](#)

Apart from the absence of a suitable figure for the A12/B1119 junction being included in the Consultation Document (on-line, memory stick or paper), KcCPC have no comment to make

CLlr Edwina Galloway – on behalf of Kelsale-cum-Carlton Parish Council