

Relevant Representations of Kelsale-cum-Carlton Parish Council on Sizewell C

As a directly impacted Parish we wish to raise concerns about:

1. Application

- The approach to 'subsequent approvals' and how they will be managed. e.g. at Hinkley Point significant changes to HGV volumes being applied for, relatively shortly after DCO given.

2. Site selection

- We believe this to be 'too big', in the wrong place with the wrong 'materials' delivery strategy, as outlined in our previous responses to Consultations 2,3 & 4, but also, as currently there are up to 8 other potential energy projects it would result in significant and unacceptable cumulative impacts to the East Suffolk environment and economy.

3. Local Communities

- The development will have significant impacts on Kelsale-cum-Carlton in addition to neighbours in Leiston, Eastbridge & Theberton, Middleton-cum-Fordley and Yoxford - seriously impacting the life, wellbeing and mental health of residents, and all communities adjacent to the A12.
- At our southern boundary is the Leiston branch line, proposed to be uplifted generating significant noise and pollution nuisance for nearby Parish residents, in addition to many more across open fields.
- At our northern boundary, the Parish is proposed as the site for the SLR (Sizewell Link Road) A12 western roundabout. The impact of the SLR's construction and operation being loss of amenity, vibration, light, noise, traffic pollutants, visual, and dirt/dust nuisances on nearby residents, farms and businesses.
- In the west the impact of significantly heavier traffic will increase severance in part of our Parish - Rendham Road and significantly increase road noise and pollutants in Curlew Green, Dorley's Corner and the properties at Hedgehog Hall.
- To the east, Theberton Bypass, the blocking-up of Pretty Lane and SLR means the Parish is completely encircled by aspects of development. The direct impact is cumulatively reducing the ability of; local businesses, residents, visitors, tourists, carriers and couriers to go about their respective activities without hindrance. Aspects directly impacting these users include;
 - Any recreational journeys by campus/caravan park residents and weekend trips for workers back home

- Up to or over 700 (peak construction) daily additional LGV journeys
- Up to or over 600 additional bus journeys
- Close to 2,000 (peak construction) daily additional HGV Main Site movements
- The level of amenity and enjoyment provided by the Parish's lanes, footpath networks and agricultural landscape by residents of both Kelsale cum Carlton and neighbouring communities (as highlighted and evidenced during the COVID-19 lockdown of Spring & Summer 2020) will be significantly impacted. We need mitigation and compensation as a consequence, but ideally measures to ensure Sizewell traffic does not use the Parish as a rat run, self-routing etc.

4. Transport

EDF's transport strategy omits sufficient justification on a number of aspects.

- The starting point for the Main Construction Traffic route (Planning Statement Appendix A 7.2.1) remains unjustified and pre-supposes no new/additional haul route from the outset
- A SLR appeared for the first time in Consultation 3, with a limited number of alternative routes being dismissed with little analysis or justification demonstrated. This brings traffic further north than needed, increasing all forms of pollution unnecessarily.
- The EDF SLR selection process remains unclear and unjustified, despite the Peer Review
- The Peer Review of the EDF SLR Selection Process lacks; detail, transparent weightings, a sound rationale for decision making and seemingly relies heavily on 1980's reports and analysis.
- The SLR is too close in proximity to the existing access road of the B1122 thus still drawing traffic unnecessarily to one area and providing little overall relief.
- The SLR will isolate and sever our Parish by impeding access to Public Rights of Way during its construction
- The SLR will remove from cultivation prime arable farmland and threaten farm viability.
- Unacceptable impact when the forecast daily car and LGV traffic carried mainly on feeder network will contribute to **“an unacceptable impact on highway safety...”**. i.e. unmanaged EDF traffic funnels from 90 minute travel radius onto a progressively limited number of narrower roads & lanes onto A12 and then to site. **(NPPF (Ref 3.7) updated 2.19 Promoting Sustainable Transport Chapter Para 109)**
- Insufficient consideration has been given to traffic level analysis for both weekends and holiday periods for a tourist destination. 'Good practice' would be to include this analysis, confirmed in DoT correspondence 4.3.2019. The later use of selective historic data to justify the impact assessment is undesirable.

- There are inadequate mitigations specific to the Parish and its' neighbours. Requirements for “...**safe, secure and attractive...**” and proposals that “...**minimise the scope for conflicts between pedestrians, cyclists and vehicles**” and the mitigation of detrimental impacts on the ecology and local communities, appear to have been totally ignored as an expedient measure. **NPPF (Ref. 3.7), updated in February 2019 under 'Promoting Sustainable Transport Chapter', Para 110(c)**. We highlighted 70 impacts in our response to Consultation 4, many were also raised in 3, and 2 and they have not been addressed.
- Insufficient consideration has been given as a responsible employer, to safeguard; the public, individual workers, other road users and fellow worksite colleagues when the working day of a 'local' Sizewell C worker could conceivably comprise a 90 minute drive to either of the Sizewell Park and Ride sites (or directly to the Main Site Car Park), a bus ride, security/alcohol and drug testing, a full shift, a return bus ride and another 90 minute drive back home. Particularly as fatigue causes multiple safety issues. Sources: ***DVLA 'Tiredness Kills' INF159 and Q Various through the BRAKE road safety charity**
- There is no Freight management facility to the north and it is unclear what would happen in the event of an issue on the A12 north of the site.
- Planned road maintenance is referred to, but unplanned road maintenance is not. The A12, a de-trunked road is the one key route for traffic seeking to pass through the majority of Coastal Suffolk, (parts being single carriageway) and the impact on the A12 of HGVs will be higher carriageway 'surface and bed' attrition than other traffic.
- The Traffic Management Plan includes HGV's (inward journey only) but excludes LGV, Cars, Motorcycles, Buses thus giving insufficient consideration to the overall impact.
- Car sharing plan is unambitious and inadequate causing more traffic issues as described above. The impact of traffic on our Parish could be reduced by contractual obligations routing all Sizewell workers through an agreed route to site. This could also result in a reduction in the amount of land used for car parking.

5. Landscape & Heritage

- Unmanaged traffic including 10,000 new daily car movements (at Peak) will seriously impact the Parish which largely consists of single track, unpaved lanes giving access to arable farmlands, and hamlets leading to a Conservation Area via roadside nature reserves (in addition to many listed buildings).

6. Environment

- Unsustainable impact on water supplies in the driest part of the country.

- Impact on nationally significant natural history in the Parish and surrounding area i.e. Bats, Great Crested Newts and many other flora and fauna assets (Suffolk Biodiversity Information Service)

7. Economic and social impacts

- Impact of local business losing trained staff
- Negative socio-economic impacts of the development are not adequately addressed by the developer
- The detail of the proposed housing and tourism funds is inadequate, our Parish is not specifically named as one which would receive mitigation/compensation.
- Tourists come here to enjoy the countryside/wildlife, easy access to beaches and Minsmere. Our responses to consultation 2,3&4 together with a Parish survey in 2019 indicated Parishioners are very concerned about the impact of the development on these issues together with transport. The DCO proposals bring more traffic and concerns.
- Main site car parking for 'home based workers' based on a quarter of workers being categorised as local, and defined as up to 90 minutes away may not relate to many Suffolk workers actually benefitting in economic gain but taking environmental and social impacts.