

Community Impact on Kelsale-cum-Carlton - Executive Summary

PURPOSE

This paper was undertaken to review the proposals being brought forward by the applicant in the context of the impact on the Parish of Kelsale-cum-Carlton (KcC).

SUMMARY

Traffic associated with the construction of the proposed SZC power station together with the construction and use of the Sizewell Link Road (SLR), in addition to the revised railway proposals pose an existential risk to; the environment, flora, fauna, residents health & well-being, businesses and their viability, tourism and its continuance, landscapes and their value, habits and ecology. We therefore object to both the proposals for SZC and the location of the SLR

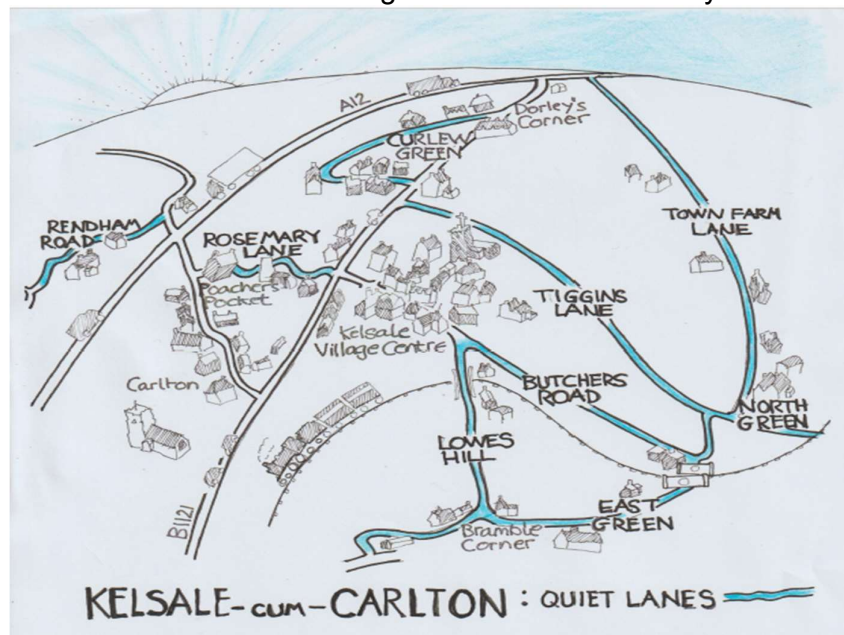
It is for the Applicant to demonstrate that they have sought to avoid, and/or to mitigate the impacts that may arise in the transport of materials, goods, and personnel to the sites, in addition to the construction of the SLR.

This document outlines some of the key 'assets' of KcC (one of the largest Parishes in Suffolk by area) and summarises the key issues based on the sustainable development themes outlined in EN-6.

Edwina Galloway on behalf of Kelsale-cum-Carlton Parish Council (Ref: 20026592)

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Sizewell C Draft DCO

Community Impact on from Kelsale-cum-Carlton

Introduction to Kelsale-cum-Carlton

1.1 This is a Representation to the Examining Authority for the SZC dDCO, made by Kelsale-cum-Carlton Parish Council [KcCPC] on behalf of its 1,100 residents, Parish based businesses and its significant farming community.

1.2 Kelsale-cum-Carlton [KcC] is approximately 7 miles by road and just over 5 miles as the crow flies from the Sizewell site and is bisected by the A12.

1.3 Prior to 1885 Kelsale & Carlton were separate Parishes. However, from 25th March that year under the divided Parishes Act they became one. The Parish now comprises Kelsale, Carlton, and the hamlets of; East Green, North Green, Curlew Green and Dorley's Corner.

1.4 KcC is a large rural Parish bordering Middleton-cum-Fordley, Theberton, Saxmundham, Rendham, Yoxford, Sibton and Knodishall.

1.5 Saxmundham acts as the primary 'service centre' to KcC, although Leiston also continues to provide services to rural households and agricultural families especially to the east of the Parish.

1.6 Initial research (presumably conducted remotely or substantially desk based) by the Applicant seems to have used an arcane ONS 'warding' cluster, grouping KcC alongside Theberton and Eastbridge in a Saxmundham 'Ward'. Quite why this division has been used is unclear but it may have given rise to the Applicant often referring to KcC as somewhere 'South of Yoxford'.

1.7 As a direct consequence there is little documented within the dDCO appertaining to the rich diversity of notable assets within the Parish.

1.8 In an effort to rebalance this act of omission by the Applicant, and on the basis, you cannot understand the harm that is being done if you do not understand what exists - this document outlines some of the key 'assets' of KcC (one of the largest Parishes in Suffolk by area) and summarises the key issues based on the sustainable development themes outlined in EN-6.

2. Structure of the Representation

2.1 In order to reduce the potential for confusion, KcCPC have developed their response to mirror the categorisation within the Appraisal of Sustainability Report.

3. East Suffolk and Energy Projects

3.1 The SZC dDCO is to build not one, but two nuclear reactors housed in a single 'power station'. EDF have confirmed they will apply for permission later this year for an electrolyser powered by the adjacent operational reactor (SZB) to produce Hydrogen and then, a prototype Direct Air Capture capability.

3.2 Elsewhere, two concurrent dDCO's by Scottish Power Renewables are being Examined by the Planning Inspectorate and it is highly likely further so called 'Interconnect' projects will be submitted shortly thereafter.

3.3 This is in addition to ambitious programmes of house building outlined in the recently 'made' Local Plan 2020. This includes a significant development at Saxmundham (immediately adjacent to the A12) and another at Brightwell Lakes (adjacent to the A12).

4. The Main Development Site context

4.1 The Sizewell site nominated by the Applicant is located on the Suffolk Heritage Coast and is wholly within the Suffolk Coast and Heaths AONB.

4.2 The Appraisal of Sustainability Report [AoS] states; "...although set in the context of the existing power station, the development will have an adverse impact on landscape character and an adverse visual impact on a nationally designated landscape" this it has already been said, could not be fully mitigated. There are also potential adverse effects on at least five nature conservation sites of UK and European importance, including Minsmere.

5. Air Quality

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To avoid adverse impacts on air quality](#)

5.1 The 2010 AoS confirms the construction of a nuclear power station at Sizewell is likely to have localised adverse effects on air quality in the short term (5-6 years), including dust and emissions from construction vehicles, Heavy Goods Vehicles (HGVs), and traffic movements generated by the estimated construction workforce of 4,000, concluding this has the potential to affect residential properties in the surrounding area and villages.

5.2 The critical point to note is that the AoS, was led to believe SZC would take 5-6 years to build. In fact, it now said construction through to 'electricity generation' could take 'up to 12 years' and its possible it could be longer.

5.3 Not only is the duration likely to be double the initial assessment, it seems probable the concomitant impacts will be similarly affected (i.e., twice the vehicle movements, more materials, etc.)

5.4 However, this is not an issue based solely on the construction period. To set the scene, both HPC & SZC initially consulted on the basis of 5,600 workers 'at peak'. But at Stage 3 in March 2019, SZC estimates grew 41% to 7,900.

5.5 Moreover six months earlier, in November 2018, in a review of the economic impacts of SZC, commissioned by Suffolk County Council, independent consultants Hardistry Jones had suggested that 8-9,000 workers would be required.

5.6 In fact, when compared with what actually happened at HPC, the Hardistry Jones forecast was a very good bellwether. Because, by February 2021 EDF confirmed plans to increase the workforce to 8,500. Assuming the same pattern (outlined by the Applicant in the dDCO) arises at the proposed SZC, the impact is materially different from that forecast in the 2010 AoS report. Something that in combination with other changes within the dDCO, must raise questions of suitability of the Sizewell Site for such a large power station complex.

5.7 Air pollution is now recognised as having a significant detrimental impact on the UK population; shortening lives, impairing health, causing lung disease and other chronic conditions. It is a bigger global killer than smoking. It costs the UK economy over £20 billion a year. There is no shortage of studies which highlight the impact of air pollution in causing illness such as; dementia, asthma, in addition to the risk of sight loss, and premature death of babies.

5.8 Our residents are concerned about the impact of the increased traffic and the consequential increase in pollution. The high levels of traffic being brought north on the A12 to the proposed SLR and the consequences on the local road network will increase pollution. The ExA will be aware of the recent landmark case of a nine-year-old girl who died in 2013 following an asthma attack and who has become the first person in the UK to have 'air pollution' listed as a cause of death.

5.9 A number of our residents with asthma and other breathing impairments chose Coastal Suffolk as the place to live due to the air quality and the low levels of traffic pollution.

5.10 We understand the government are working to introduce a new Environment Act having promised that "environmental standards are not only maintained but enhanced" after the UK exited the European Union.

5.11 The volume and type of traffic proposed on our roads is not sustainable and its unmanaged and unmonitored use of the fragile road network beyond the A12 will do untold and extensive damage; to the fabric of the roads and lanes, verges, ditches, the environment and the habitats of a wide range of animals, birds and flora.

5.12 At a meeting with Theberton & Eastbridge Council in December 2020, in response to a question regarding appropriate controls on traffic, it was stated by EDF representatives that "it is a free country" and 'people can drive where they like'.

5.13 Acknowledging individual freedoms do exist for us, it is unconscionable for the Applicant to so easily deny all responsibility for the behaviour their contractors and employees.

5.14 At a time when the Government are committed to reducing traffic and the consequential pollution, this is not an acceptable price for our residents to pay.

5.15 Although mentioned in the specific context of the SLR, the impact of pollution and subsequent reduction in air quality arising from bringing the bulk of traffic so far up the A12 means that; air and other forms of pollution from traffic (including a significant HGV component), will permeate much of this part of Suffolk.

5.16 This must be viewed in the context that when SZB was constructed, a temporary marine facility was built and much of the significantly smaller amount of construction material was delivered that way.

Conclusion: We respectfully request the ExA revisit the issue of Air Quality in KcC & along the A12, based on the substantial increase in the construction time and the increase in workers required to construct SZC, combined with bringing traffic so far north to the proposed SLR roundabout at Mile Hill.

6. Biodiversity & Ecosystems

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To avoid adverse impacts on the integrity of wildlife sites of international importance to avoid adverse impacts on valuable ecological networks and ecosystem functionality to avoid adverse impacts on priority Habitats and species including European Protected Species.](#)

6.1 As the SLR proposal was only brought forward at Stage 3, the breadth, depth and temporal scope of surveying undertaken by the Applicant will invariably be more limited than might have been the case had the route been considered earlier on.

6.2 Consequently, the Parish Council understands why important details are missing from the inventory of KcC's biodiversity and ecosystem assets. It is however aware that a number of Natura 2000 sites are present, notably to the eastern end of the proposed Link Road. We are aware that surveys are currently being undertaken by the Applicants Ecologists and no doubt a Habitat Regulations Assessment and where appropriate a full Appropriate Assessment will be provided in due course.

We expect a full suite of surveys will be required for this project and this should include all potential compound sites as well as the length of the road. We anticipate this will include Phase I, botany, invertebrates, great crested newts (and consideration of other amphibians) reptiles, breeding and wintering birds, bats, badgers, otter, water-vole and given a recent record in Saxmundham, dormouse. However, it will no doubt take some while to gain a full picture.

6.3 Therefore, the Parish Council is taking this opportunity to begin to address this deficit as follows:

6.4 Simpsons Fromus Valley Reserve: a significant nature reserve comprising over 27 acres of ancient woodland, ponds and meadows once part of a medieval deer park. It is one of the few semi natural stretches of the River Fromus in the Parish showing riffles and meanders absent elsewhere. It is located to the west of the A12 at Mile Hill, in close proximity to the proposed SLR roundabout.

It is under the custodianship of a Charitable Trust chaired by the 5th Earl of Cranbrook.

6.5 The Reserve is a legacy of Francis Simpson, MBE who for 60 years chronicled and grieved over – the price paid for progress by Suffolk's wildlife, especially its wild flowers. He was Suffolk's Botanical Recorder for more than 50 years and died in 2003. He was the author of the Flora of Suffolk published in 1982.

He is probably most remembered for bringing to the attention of the public that *"The survival of habitats must not be left to chance"*.

6.6 Fromus Valley Reserve supports over 50 bird species including endangered species such as bullfinch, yellowhammer and skylark.

6.7 The site also provides a wildlife haven attracting significant numbers of migrant birds in the winter, including fieldfares and redwings and acts as a refuge for resident bird species. It also supports a rich invertebrate fauna associated with grazing livestock.

6.8 The Reserve is also notable for a number of books having been written by respected authors about the ecology and archaeology preserved in the Reserve.

6.9 Roadside Nature Reserves:

a] Tiggins Lane (209):

Area protected for boulder clay flora such as sulphur clover. (Please note, this road merges into Fordley Road which also has another Roadside Nature Reserve)

b] near Coe Wood (187):

Area protected for boulder clay flora such as sulphur clover

c] Main Road, Kelsale:

Area protected for the nationally rare and protected Sandy Stiltball Fungus (*Battarrea phalloides*)

Note: Privately owned Tiggins Lane assets: **Tiggins Meadow** contains a diverse range of habitats including species-rich grassland on former arable, privately owned and managed primarily for nature conservation, directly adjoining Tiggins lane, and contiguous with **Mabels Wood** (privately owned) and managed as planted mixed deciduous woodland on former arable land as a family memorial and wildlife conservation area.

6.10 County Wildlife sites:

In Suffolk there are approximately 900 County wildlife sites, 3 of which are in, or immediately adjacent to the Parish.

a] Clay Hills known as the Kelsale Morio Meadow is a rare surviving traditionally managed unimproved meadow with the largest population of *Anacamptis morio* (green winged orchid) in Suffolk, together with its associated plant and invertebrate community.

b] Lonely Wood: an Ancient Woodland designated for its typical woodland flora including Early Purple Orchid and Wood Anemone. Also important for saproxylic (decayed Wood) and other Invertebrates, Birds and Bats.

c] Coe Wood: southern boundary (of Sibton) along KcC's northern boundary

6.11 Parish Biodiversity Group: The KcC Biodiversity Group has considerable expertise. The group study all areas of the Parish, logging their findings periodically with the Suffolk Biodiversity Information Service and updating their own Parish inventory, an example of which can be found on the Parish Council website at www.kelsalecarltonpc.org.uk in the Environment section. The Group is gathering data on habitats and species within the parish with the aim of eventually producing a Parish Biodiversity Action Plan which can inform future biodiversity and development issues.

6.12 Activities have been curtailed during the pandemic, but their work up to that point has been recorded.

6.13 A list of National and County Biodiversity Priority Species recorded in the Parish including any legally protected species is found below. In addition, the Group have added species that due to their scarcity in the Parish, are significant at a local level.

Priority Species for Suffolk which have been recorded in KcC are listed below:

1] Mammals:

- 1.1** Bats: Common Pipistrelle, Soprano Pipistrelle, Noctule, Brandt's bat, Natterer's Bat, and Brown-long-eared bat
- 1.2** Brown Hares
- 1.3** Harvest Mouse
- 1.4** Hedgehog
- 1.5** Water Vole
- 1.6** Badger
- 1.7** Otter

In comparison Bats recorded at Minsmere include: Common Pipistrelle, Soprano Pipistrelle, Nathusius' Pipistrelle, Noctual bat, Serotine bat, Natterer's bat, Daubenton's bat, Natter's bat.

2] Birds:

- | | |
|---|----------------------------|
| 1.1 Barn Owl (breeding at two or more sites) | 1.2 Cuckoo |
| 1.3 Bullfinch (locations in scrub/dense hedgerows) | 1.4 Lapwing |
| 1.5 House Sparrow (breeding at two or more sites) | 1.6 Linnet |
| 1.7 Marsh Tit | 1.8 Mistle Thrush |
| 1.9 Nightingale | 1.10 Skylark |
| 1.11 Spotted Flycatcher | 1.12 Swift, Swallow |
| 1.13 Song Thrush | 1.14 Starling |
| 1.15 Red Kite | 1.16 Turtle Dove |
| 1.17 Buzzard | 1.18 Yellowhammer |

All species above are on the UK Red List - most vulnerable bird species of conservation concern apart from red kite, buzzard, swift and swallow which are not currently on the list

3] Reptiles: Common Lizard, Slow worm, Grass Snake

4] Amphibians: Common Toad, Great Crested Newt, Smooth Newt,

5] Invertebrates:

- 1.1** Grayling butterfly
- 1.2** White Admiral butterfly

1.3 White-letter Hairstreak butterfly

1.4 Horehound Longhorn Moth

1.5 Longitarsus quadriguttatus Hound's tongue leaf beetle Nationally Rare (1 site)

1.6 Oedemera femoralis a thick-kneed flower beetle Nationally Scarce (3 sites)

1.7 Gorytes laticinctus a solitary wasp (RDB3) species (the 8th Suffolk record)

6] Plants

Achillea ptarmica Sneezewort (1 site)

Allium ursinum Ramsons, Wild Garlic (3 sites)

Anacamptis pyramidalis Pyramidal orchid (3 sites),

Anacamptis morio Green winged orchid

Cardamine pratensis Lady's Smock, Cuckoo Flower, Milkmaids (4+ sites),

Clinopodium vulgare Wild Basil (2 sites),

Cynoglossum officinale Houndstongue (1 site)

Dactylorhiza fuchsii Common Spotted Orchid (3 sites),

Dactylorhiza praetermissa Southern Marsh Orchid (1 sites),

Daphne laureola Spurge Laurel (3 sites),

Fritillaria meleagris Snakeshead Fritillary (1 site*),

Galaeobdolon luteum Yellow Archangel (1 site),

Knautia arvensis Field Scabious (3 sites),

Lathyrus nissolia Grass Vetchling (1 site),

Lepidium heterophyllum Smith's pepperwort (1 site)

Lithospermum officinale Common Gromwell (1 site),

Odontites verna Red Bartsia (5 sites),

Ophioglossum vulgare Adders Tongue Fern (1 site),

Ophrys apifera Bee Orchid (2 sites),

Orchis mascula Early Purple Orchid (2 Sites)

Orobanche minor Common Broomrape (1 site)

Palanthera chlorantha Greater Butterfly Orchid (1 site)

Ranunculus auricomus Goldilocks Buttercup (2 sites),

Rhinanthus minor Yellow Rattle (3 sites +1*),

Scrophularia aquatica Water Figwort (1 site),

Trifolium fragiferum Strawberry Clover (1 site),

7] Fungus

Sandy Stiltball. (*Battarrea phalloides*)

6.14 In addition to public 'space', the Biodiversity Group also survey particular areas of private land in the Parish (by invitation or with the owner's permission) and have surveyed 2 areas near the proposed SLR; Fir Tree Farm & Kelsale Lodge.

6.15 Fir Tree Farm was surveyed in 2019, and extracts of the report are below:

a] Description of area:

Scrub is a poorly represented habitat within the Parish, and this area is one of the most extensive present. The area has potential to support a wide range of biodiversity and act as a reservoir of wildlife for the wider countryside. If managed sensitively it could develop an even richer flora and fauna over time. Ponds elsewhere on site and on adjacent land are an important addition to the habitat mosaic present.

The scrub field is important for protected species such as great-crested newt (terrestrial phase) and also for foraging bats, birds, reptiles and invertebrates.

b] Notable species

Great-crested newt (*Triturus cristatus*) is known to be present in ponds in the vicinity (see earlier ecological survey) and the scrub area will be very important for the terrestrial phase of the lifecycle of this protected species.

In addition, the habitat appears to be eminently suitable for protected reptiles such as Common Lizard (*Zootoca vivipara*) and Slow-worm (*Anguis fragilis*) as well as Grass snake (*Natrix natrix*). Weather conditions were not suitable for these species to be observable, but their presence could easily be confirmed by survey, utilising tin or felt refugia.

The habitat mosaic would certainly be expected to support many species of insects such as butterflies, bees, beetles, grasshoppers etc. as well as other invertebrates.

Evidence of the immature stages of a picture-winged fly *Myopites inulaedyssenteriae* were abundant on fleabane (*Pulicaria dyssenterica*). This nationally rare species is accorded Red Data Book 3 (RDB3) status. However, this may be revised in the light of further studies. Further survey under more favourable conditions would doubtless add substantially to both floral and faunal species lists.

c] Connectivity

Individual habitats cannot thrive in isolation, and for example fields by the Fir Tree Farm are linked to the wider countryside and other semi-natural habitats by hedgerows of varying quality, with the A12 forming a considerable barrier to the west.

Another busy, new road would further fragment this connectivity, as well as having an adverse effect on more mobile species such as Badger (a protected species), Brown Hare (a BAP species) as well as hedgehog and deer species, leading to an increase in road kill deaths and accidents, already all too familiar on the A12.

Other impacts on wildlife of a new road and associated construction infrastructure are light and noise pollution, both during construction and from street lighting and passing traffic after construction. These will have a profound effect on the scrub and associated areas nearby.

Light pollution is known to adversely affect foraging in some bat species as well as interfering with bird reproductive cycles and migration patterns. Nocturnal invertebrates can also suffer negative impacts from intense illumination sources.

Whilst wildlife can in some cases adapt to some background noise, more sensitive species are likely to be repelled or otherwise negatively affected and suffer disturbance from such pollution.

The A12 is already a source of noise and light pollution and additional road construction will further compound such pollution.

6.16 The Dasgupta Review, was published in February 2021 and a quote from Inger Andersen, UN Under-Secretary-General and Executive Director of the UN Environment Programme is as follows:

“The message from the Dasgupta Review on the Economics of Biodiversity is loud and clear: we must fix our relationship with the natural world or destroy human prosperity, well-being and our future. And it is with this knowledge in hand that in 2021 we must seek to join up the climate and nature agendas, and arrive at an ambitious, measurable and accountable post-2020 global biodiversity framework. To secure nature is to invest in our own self-preservation.”

6.17 By proposing the SLR in our Parish, not far from the existing access road to Sizewell at Yoxford and ‘driving’ the traffic up the A12 further north than necessary, not only human residents will suffer severance. Please note in addition to wildlife rich verges that the Parish also has a rich source of mature hedgerows which weave around and interconnect the Parish providing significant biodiversity gain.

6.18 Britain’s biodiversity is the worst amongst the G7, based on the Biodiversity Intactness Index [BII].

6.19 The information on some of the recorded biodiversity in KcC has been studied over many years by respected ecologists. (See Sources Section 16) You will note there are a number of protected species in the Parish, those listed in S41 of the Natural Environment and Rural Communities Act 2006 and those which have been given a conservation status. There are also many ponds which are a Priority Habitat, and a hydrological assessment must be undertaken to ensure runoff and changes in hydrology do not affect ponds for example at Fir Tree Farm.

6.20 We understand that bat surveys have been in progress during April but must raise the point that throughout April, the Parish had no rain, but frosts virtually every night and this would not have been a suitable time for the start of a bat survey as they do not like cold nights, it has to be 8-10 degrees before they appear.

Conclusion: We request the ExA give full consideration to the impact of significant increases in pollutants (including noise, vibration, light, nitrous oxide, etc.) and damaging traffic levels in an area with extensive ecological assets including; County Wildlife sites, Roadside Nature Reserves, Nature Reserves, Red Listed and other declining species.

Conclusion: We request the ExA give full consideration to the proposal that an inordinate volume of traffic is to be bought so far north to traverse good agricultural land, in contrast to other more direct and shorter options.

Conclusion: In the event that the SLR receives consent as part of the overall DCO, KcCPC ask that the ExA compel the applicant to prove full lighting mitigation to the highest standards, ensuring lights are downward pointing in cowls. This is both because of the potential impact on bats is particularly strong around Fir tree Farm due to lighting at the proposed roundabout and construction compound but also the impact on the residents at Fir tree Farm and other nearby properties including (but not exclusively) Buskie Farm, Laurel Farm, Mile Hill Barn, Kelsale Lodge, Foxen, Kelsale Lodge Cottage & Rosetta Cottage.

The full area should be subject to a bat survey of at least moderate, but potentially high, habitat suitability. We are concerned embedded mitigation will take a long time to become effective for bats, where severance of commuting routes is not necessarily easily resolved by the provision of 'safe crossings'. Please see the website Conservation Evidence which shows variable results for the efficacy of 'safe crossings'

7. Climate Change

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To minimise Greenhouse Gas Emissions](#)

7.1 The 2010 AoS established that significant harm would arise from the development of a proposal involving half the number of construction workers, taking half the duration now required by the Applicant to complete the proposed SZC project, alongside all the concomitant impacts (i.e., 12.1m tonnes of construction materials, incalculable HGV emissions, innumerable 'vehicle miles', etc.).

7.2 Additionally, taking account of; the location of the Applicants preferred SLR route, minimal efforts to optimise car sharing, the excessive on-site car parking provisions and seemingly no compulsion in respect to Park & Ride use for Main Site, Accommodation Campus or Camp Site access, it is reasonable to assume that the impacts (direct and indirect) will be considerably higher and constitute an even more 'significant impact' than a simple multiplier effect implied.

7.3 It is also self-evident that the Sizewell site is potentially vulnerable to a number of consequences of climate change, i.e., increased sea level, tidal surges, increased CO², coastal erosion, etc. The issue of water shortages in East Anglia and the generic issue of the lack of rain is dealt with elsewhere.

7.4 However, less evident is excess rainfall over the last winter, which caused SCC's Flood Risk Management Committee to meet in early 2021 to ensure long term financing and resources were in place to tackle soaring road flooding problems.

7.5 The current backlog could take 10 years and millions of pounds to remedy after the number of road flooding problem 'hotspots' increased by 60% in 18 months.

7.6 In yet another contrast, a study by the University of Reading found parts of Eastern and Southern England may face the highest threat level of wildfires (exceptional danger) on several days every year by 2080 if world emissions of greenhouse gases remain high.

7.7 The study identified the rising fire risk is predominately due to a 'perfect storm' combining, hotter temperatures, lower summer rainfalls, lower humidity and stronger winds. A combination more regularly experienced in Suffolk since the new millennium.

Conclusion: KcCPC request the ExA thoroughly explore the hypothesis that Climate Change is a proven issue, that East Suffolk demonstrates the potential to experience a damaging climate change driven event in the next ten years.

Conclusion: The impact of significant volumes of traffic and workers over twice the period of time initially assessed will cause such devastation to the biodiversity rich areas of Suffolk, that the harm caused will outweigh the choice of location. The community impact of this project is too vast, too huge, too substantial.

8. Communities: Population, Employment and Viability

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [to create employment opportunities, to encourage the deployment of sustainable communities to avoid adverse impacts on property and land values and avoid planning blight.](#)

8.1 To put our Parish in context, in 2017 as a county, Suffolk when compared to England, had a higher proportion of people aged over 65+ and a lower percentage of working age people.

8.2 Currently about 1 in 5 people living in Suffolk are aged 65+ and this is forecast to change further, with 1 in 3 residents being aged 65+ compared to 1 in 4 for all England in 20 years' time.

8.3 Suffolk Coastal & Waveney (now East Suffolk Council) have the highest percentage of its population over 65+ in Suffolk.

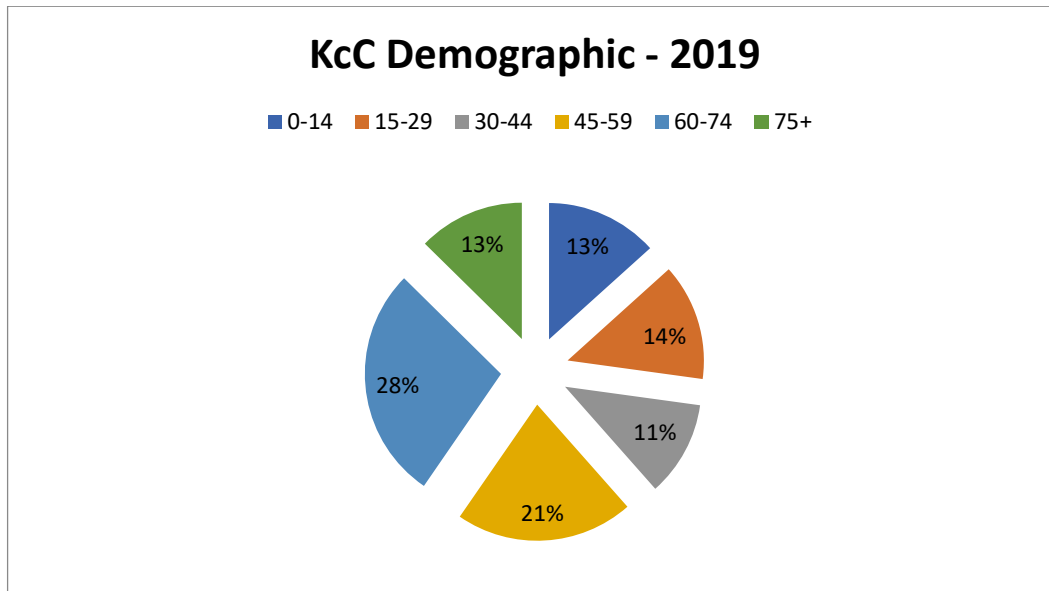
8.4 The KcC Parish profile (according to East Suffolk DC in 2019) is as follows:

Population: 990

Dwellings: 499

Land area: 14km²

The population is split demographically as follows:



8.5 Although it will be some time before we see the results of the 2021 Census, we anticipate the trend of an increase in residents of 65 and over will continue.

8.6 With little in the way of public transport available in the Parish, a high proportion of residents use private cars, and therefore access to services centres, emergency services and support networks are critical.

8.7 It is also important to note that broadband services in our more rural areas remain patchy as demonstrated during Pre-Application and more recently during the dDCO Preliminary meetings.

8.8 A recent review by Cllr Mark Stewart, a property expert who has worked at Savills (London), Bidwells (East Anglia) & Flick & Co (Saxmundham), suggests that property or land within $\frac{1}{4}$ of a mile of the SLR (as an example) will be affected by the proposed development, with numbers of properties suffering blight.

8.9 In our Parish, the Applicants Property Price Support Scheme (launched in November 2019) only includes Fir Tree Farm and Rosetta Cottage.

8.10 However, nearby; Mile Hill Gallery and Buskie Farm, together with Foxen and Lodge Cottage are apparently outside of the impacted 'zone' and therefore we understand not included in the scheme.

8.11 We also draw the ExA's attention to the Grade II listed properties of Kelsale Lodge, (with separately listed Barn), Laurel Farm & Hedgehogs adjacent to the A12 which will have potentially damaging impacts from the increased noise, pollution, light, dust and vibration on the A12 and should it be given consent, the SLR.

8.12 One property owner who would have a construction compound by their holiday business and residential property said of the impact on them: “...*The economic impact is also expected by us to be severe as we do not expect holiday guests to find us a desirable location to stay at, with all the plant, vehicles and toilet blocks in view. Of course, the impact on us goes beyond the building of the link road as the construction traffic for Sizewell C is expected to last for 10 or more years. Then the deconstruction of the road will no doubt take another 2yrs or so! So 14 + years altogether! We expect to lose our income, which will force us to sell up. The property will be devalued and cause us further hardship.*”

8.13 The consequence of dividing up farmland for the SLR will cause claims of Injurious Affection to farmland.

8.14 Parish Residents at Lodge Cottages, and Kelsale Lodge (Kelsale Lodge is accessed via Lodge Farm) are concerned that access to their properties will be impeded as is the farmer who will need access to the farm with farm vehicles. Nearby residents are also concerned that as their ‘services’ are provided via a route under the A12 there will be further disruption to their daily lives.

8.15 Parish residents are concerned that 2 areas just off the A12, one in front of Hedgehogs and Park Gate Care Farm and the other in front of Red House Farm (which are used as access to nearby properties) will find vehicles relating to the proposed development ‘parking up’ thus impeding access to residents, emergency vehicles, and disrupting their daily lives. As there are no ‘facilities’, there is also potential for the leaving of assorted unpleasant detritus/litter. The same issue would apply to another similar area near the junction with Main Road B1121. There are approximately 15 properties that access their homes on the A12 near the proposed SLR which will be impacted by any traffic issues.

8.16 The higher levels of traffic on the A12 and the proposed location of the SLR will increase severance in the Parish.

8.17 Parish Residents who live just off the A12 near the proposed site of the SLR and roundabout have dwellings which are literally built on sand. We ask that the consequences of constant vibration of the traffic and construction of the SLR be modelled for the impact on properties in such close proximity.

8.18 Residents who live on Clayhills will also be impacted by the vibration, noise and pollution of any line increased use of the railway line and disturbance of trains running at night and any upgrade and maintenance.

8.19 KcCPC also draw the attention of the ExA to the fact that noise from the Leiston Branch Line does carry across the open fields into the centre of Kelsale village as well as the eastern boundary of Carlton, around the Spinney pocket and Beaumont Cottages area. This has been evidenced by trains running during the latter part of 2020 and the early months of 2021.

8.20 This directly contradicts the claims of the Applicant that the propagation of noise was of no consequence beyond the properties adjacent to the Leiston Branch line.

Conclusion: KcCPC respectfully request the ExA to consider requiring the applicant to provide suitable mitigation and/or compensation for all properties (and businesses) in addition to Fir Tree farm & Rosetta Cottage impacted by; blight, pollution (noise, dust, light etc) and vibration from the SLR, and those near or on the A12, should consent be given for the project. Taking special note of the potential impact on the Kelsale Village Conservation Area, described by the Appraiser for East Suffolk Council that if this area was not included as a Conservation Area, 'we might as well all go home'.

Conclusion: KcCPC respectfully request the ExA to consider requiring the Applicant to provide suitable mitigation and/or compensation for all properties (and businesses) in KcC proven to be impacted by blight and the propagation of noise, pollution (noise, dust, light etc) and vibration from permanent or temporary rail movements on the Leiston Branch line at Clayhills.

9. Communities: Supporting Infrastructure

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [to avoid adverse impacts on the function and efficiency of the strategic transport infrastructure to avoid disruption to the basic services and infrastructure](#)

9.1 Within KcC there is a significant and rising elderly population (see 8.4 above). In addition, a majority of residents are reliant on private cars as public transport is so poor.

9.2 The location of the SLR combined with other proposed changes to the local road network and the increased volumes of traffic (greater than 10,000 movements per day at peak) means Parish residents will find their way of life dramatically altered. It will be increasingly difficult to access service centres (Leiston & Saxmundham) for GP's, Dentists, Vets, Opticians and Churches.

9.3 Effectively our Parish will be an island surrounded by components of the "unusually large and complex dDCO, yet not able to easily access services without disruption.

9.4 For example in the north of the Parish (North & East Green) a number of residents use Leiston as a service centre. The changes to the proposed road network and the volume of vehicles on the road due to construction workers and the methods of getting to site will impact the ability to access services without delay as may sometimes be required for example in driving to the vet in an emergency.

9.5 Government statistics show "60% of people killed on Britain's roads die on rural roads, and new research shows many more drivers are needlessly putting themselves at risk of an accident. A shocking 25% of drivers report having had a near miss on a country road, while 40% have been surprised by an unexpected hazard, such as an animal. A third also confess to taking a bend too fast." Our roads are at risk of being turned into rat runs with no control exercised over workers.

9.6 A report on the potential traffic impact is being prepared by one of our 'team' for separate consideration.

Conclusion: We respectfully ask the ExA to examine the options available to ensure the Applicant primarily uses avoidance, then mitigation and finally suitable compensation for disruption in getting to and using the basic day to day services and infrastructure.

10. Human Health and Well-being

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: to avoid adverse impacts on physical health, to avoid adverse impacts on mental health, to avoid the loss of access and recreational opportunities, their quality and user convenience.

10.1 There already is considerable pressure on all health services in Coastal Suffolk. As of May 2021, there is no Dental Practice in Leiston and just one in Saxmundham.

10.2 Consequently, it is now a question of how far to drive on the A12 (i.e Woodbridge, Halesworth, Ipswich, etc.) to access this fundamental service.

10.3 There are no medical facilities in our Parish, and after a spate of retirements at Saxmundham Surgery, there are now 2 GP Partners (May 2021).

10.4 Some residents are registered with other surgeries i.e. Leiston, but need assurance in respect of unfettered road access.

10.5 Our Parish does have a Primary School which is at capacity, with a waiting list and no current plans for additional classrooms even before construction of a new 42 home housing development is complete, alongside several individual family homes currently nearing completion. Moreover, there is significant housebuilding throughout the proposed SZC construction period and beyond, to 2038 - as per the 'made' Local Plan.

10.6 For A&E services; easy, reliable access to Ipswich Hospital is vital 24/7/365. The expedient route is via the A12, but we have grave concerns about disruption, delays and overnight maintenance closures during the proposed SZC construction period.

10.7 There is no viable alternative route to Ipswich Hospital.

10.8 Access to the James Paget Hospital at Gorleston-on-Sea is again primarily via the A12, takes longer; and may also encounter similar disruption, delays and overnight maintenance closures during the proposed SZC construction period.

10.9 It is important to note that there is no shop or convenience stores in KcC, excepting a Farm shop at Maple Farm and one nearby at Peakhill Farm and several homebased specialist food producers.

10.10 There is a pub 'The Poachers Pocket' and Kelsale Social Club which is housed in the Village Hall.

10.11 There is a Primary School and three Churches and Chapels.

10.12 For the avoidance of doubt, although it is stated in EDF's Community Impact Report, there is no public lido in the ONS 'Saxmundham Ward'.

10.13 Moreover, having taken soundings from very long-standing residents, we are neither aware of the existence of one, now or ever.

10.14 Beyond recreation areas in Kelsale and Carlton, Parish residents (and many more from Saxmundham) use the amenity of KcC's network of unpaved lanes, PRoW's and nature reserves for exercise, tranquillity, dog walking, horse riding, etc. Our PRoW's are a valuable resource (increasingly so as a consequence of the Pandemic) and will be impacted by the SLR cutting through registered PRoW's. The Parish Council might have hoped to have recognised at least one other one in the area of the SLR as part of the Ramblers Association lost paths initiative.

10.15 More structured leisure necessitates a drive (or train) to other areas of East Suffolk and Norfolk (i.e. Leiston, Sizewell beach, Ipswich, Felixstowe, Lowestoft, Norwich, etc.).

10.16 As mentioned (10.14 above), the Countryside is a fundamental part of recreational activity. For example, many of Kelsale-cum-Carlton's country lanes were former tracks where farmers drove their cattle to pasture or market, which explains why there are so many twists and turns and blind bends on most of the rural roads and lanes. Virtually all are single track, unpaved and definitely unlit, some with grass growing in the middle. To add to this, a number are crossed by the railway, with unmanned crossings and weight restricted bridges.

10.17 These roads and lanes are enjoyed by horse-riders, walkers, joggers, dog walkers and cyclists, and have become increasingly popular during the pandemic, not just for residents of the Parish but from nearby communities.

10.18 The Parish Council therefore nominated Butchers Road, Curlew Green, Dorleys Corner, East Green, Theberton Road, Lowes Hill, North Green, Town Farm Road, Rendham Road, Tiggins Lane and Rosemary Lane as part of a Quiet Lanes network linking in with Middleton cum Fordley and Theberton & Eastbridge routes.

10.19 The designation is very appropriate for such well used shared recreational assets and is intended to enable even more users enjoy country lanes in greater safety, simultaneously encouraging drivers to respect other legitimate but more vulnerable road users.

10.20 The Quiet Lanes network also works with public rights of way, of which there are over 40 in the Parish, some of which will be impacted by the proposals for the SLR, with loss of access.

10.21 We are very concerned if traffic is not pro-actively managed by the Applicant, our Parish will be used as a rat run/cut through via Fordley Road, Town Farm Road amongst others, with loss of; amenity, access, quality and convenience.

10.22 Residents in our Parish use a mix of local (by which we do not mean 90-minute drive away) service centres for their physical and mental health, particularly Saxmundham and Leiston. Note, the same applies for veterinary services reflecting we are a rural Parish.

10.23 If you study and contrast maps of the areas of Coastal Suffolk & Hinkley in Somerset, it is evident that the road network here is very different, with no motorway. We rely on 1 north/south artery (not always dual carriageway), that is not even categorised as a trunk road.

10.24 In the event of an emergency at Sizewell during construction of the proposed SZC, and (for example) well over 10,000 individual vehicle movements (with shift work being a traffic multiplier) a day, we have very real concerns as to how would the area could be safely evacuated. (on the basis of the theory of shelter/evacuate/iodine prophylaxis).

10.25 The location of the proposed Sizewell Link road will actually make it difficult to access services, particularly in an emergency.

10.26 Coincidentally, KcCPC and interested residents are engaged in putting together an Emergency Plan. One of the scenarios relates to an incident at Sizewell, at present the issue is limited to SZB. However, should SZC (and other proposals) receive consent; we would need to scale up plans.

10.27 Currently there are plans for improvements to the smaller ground floor room in the Village Hall in order that it may be used as a 'rescue centre'.

10.28 Should SZC gain consent, the Parish would need to make significant improvements to the larger upstairs 'Hall', in order that it could remain as a designated 'rescue centre', but potentially for a much larger number of people.

Conclusion: We respectfully ask the ExA to consider; in the event that approval is granted for SZC and it is not possible to avoid impacts on KcC, or mitigate them effectively, specific compensation should made to Kelsale-cum-Carlton, such that the Applicant pays for the necessary improvements to the Listed Village Hall, in order that it may be utilised as a rescue centre as well as a social hub for residents of KcC.

Conclusion: Further, we ask the ExA to examine (in detail), how the Applicant expects to guarantee resident safety during a Sizewell (SZB or SZC) evacuation event, noting their forecast volume of construction traffic. This is in the context of "the vast scale of the development that is proposed" and one which is "highly, unusually large and complex" (**Quote:** Hereward Phillpot QC)

11. Cultural Heritage Assets

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [to avoid adverse impacts on the internationally important features of the historic environment to avoid adverse impacts on the setting and quality of built heritage, archaeology and historic landscapes.](#)

11.1 The identification and protection of the historic environment is an important function of the planning system and is done through the designation of Conservation Areas in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

11.2 Conservation Areas are defined as 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'.

These areas make an important contribution to the quality of life of local communities and visitors by safeguarding their physical historical features which sustain the sense of local distinctiveness and which are an important aspect of the character and appearance of our towns, villages, and countryside.

11.3 National planning advice on the identification and protection of historic buildings, conservation areas and other assets of the historic environment is set out in the National Planning Policy Framework (Chapter 16: Conserving and enhancing the historic environment) of July 2018.

11.4 The Core Strategy of the East Suffolk Local Plan contains an objective 'to maintain and enhance the quality of the distinctive natural and built environment'. The Core Strategy also provides general advice supporting the retention and enhancement of Conservation Areas whilst minimising any significant adverse impact upon them.

11.5 Conservation areas are also included under general development control policies, particularly those in relation to design where one of the key criteria requires that all new development must have regard to the character of the area and its setting. In the centre of Kelsale there is a Conservation Area, a summary of some Special Interest points are:

Kelsale Conservation Area

11.6 Kelsale Conservation Area contains a cluster of nationally designated buildings which were designed or altered by nationally significant late Victorian architects such as Norman Shaw and Edward Prior.

11.7 The village also retains a number of high-status timber framed buildings including the sixteenth century Guildhall. The grade one listed medieval parish church is a prominent local landmark and dominates the northern part of the Conservation Area.

11.8 The Conservation Area retains numerous unlisted buildings which make a strong positive contribution to its character and significance; many of these also possess considerable intrinsic interest.

11.9 The Conservation Area is of considerable character and historic interest, including nineteenth century cottages, farm buildings, a former smithy, and a charming classical Methodist Chapel. In addition to their own intrinsic value, they contribute considerably to the setting of nearby listed buildings.

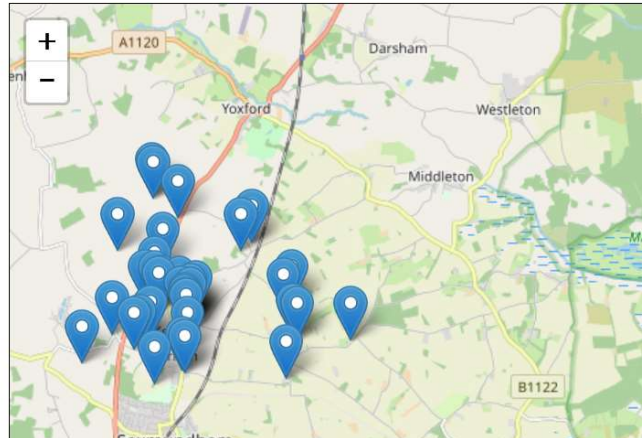
11.10 In common with several villages in the Suffolk Coastal district, pavements are largely lacking from Kelsale, as are concrete kerbs and street lighting, which helps retain a rural and largely unaltered streetscape.

11.11 To the north-east of the village, along Tiggins Lane, is a dense belt of trees which visually separates the grounds of Kelsale Court and Kelsale Manor. These tree belts give Tiggins Lane an enclosed woodland character and form a critical part of the setting of the listed buildings in the immediate (Conservation) area. Map of Conservation Area attached.

11.12 To put this in context there are 37 listed buildings in the Parish:

(Grade) II Ashgrove Farmhouse, II Barn 50 Metres South East of Kelsale Lodge, II Beech Tree Farmhouse, II Brightmere, II Brook Cottage, II Carlton Cottage, II Carlton Cross, II Carlton Green Farmhouse, II Carlton Rookery, I Church of St Mary and St Peter, II* Church of St Peter, II Curlew Green Farmhouse, II East Green Farmhouse, II Kelsale Court, II Kelsale Hall, II Kelsale Lodge,

11* Kelsale Manor ,11 Kelsale Mill, 11 Kelsale Social Club (Including Corner Cottage),11 Laurel Farmhouse, 11* Lych Gate to Church of St Mary and St Peter, 11 Manor House, 11 North Green Farmhouse, 11 Oak Tree Farmhouse, 11 Old Rectory Cottages, 11 Orchard Cottage, 11 Orchard Farmhouse, 11 Park Farmhouse, 11 Peakhill Cottages, 11 Robins Patch and Cherry Tree Cottage, 11 Rosebank and Rosebank Cottage, 11 The Eight Bells, 11 The Garden House, 11 The Old Guildhall, 11 Thornlands, 11 Tudor House (Hedgehogs), Grove Farmhouse.



11.13 In addition, Carlton Park has an area of historic parkland which is a non-designated heritage asset and there is a signpost at the junction of East Green and Theberton Road which has the same designation.

11.14 By proposing the SLR so close to the existing access road to Sizewell at Yoxford and 'driving' the traffic up the A12 far more than necessary, there will be greater impact from severance. There will be impact from lighting, vibration, roadkill, pollution and noise.

Conclusion: KcCPC respectfully ask the ExA to consider; the impact of increased traffic through a parish with such rich ecological and historical assets and to make provision within the DCO (should it receive consent) for the avoidance of further harm, by ensuring traffic engaged (directly or indirectly) in the construction of SZC, not being permitted to route through the Parish.

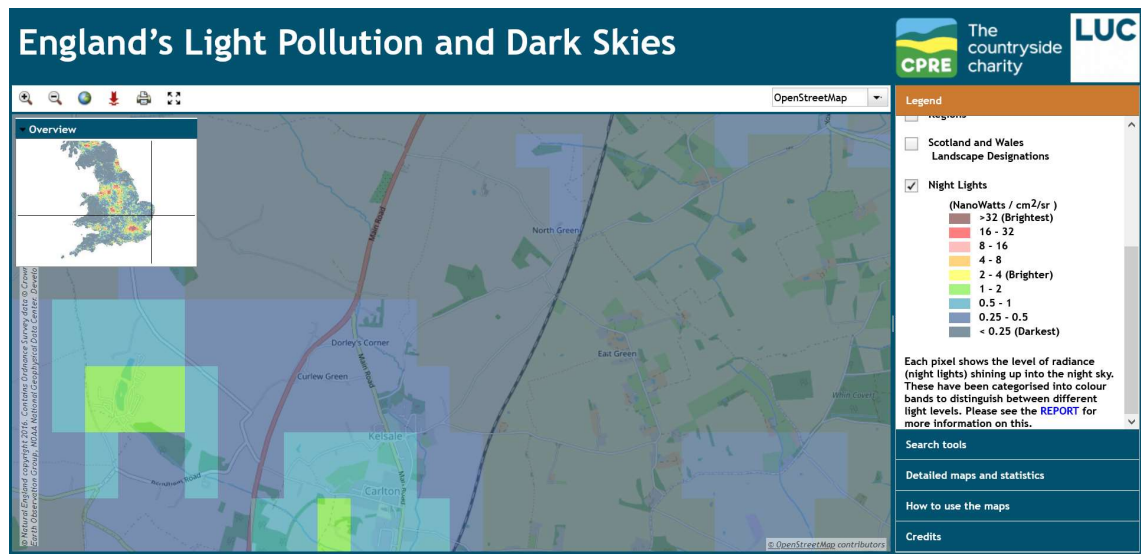
12. Landscape

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To avoid adverse impacts on nationally important landscapes to avoid adverse impacts on landscape character quality and tranquillity, diversity and distinctiveness.](#)

Dark Skies

12.1 There is little street lighting in the Parish and as can be seen from the screenshot below the dark skies the Parish enjoys are amongst the darkest measured at -0.25, 0.25-0.5 and 0.5-1.



Dark skies have a significant well-being aspect, humans evolved to the rhythms of the natural light-dark cycle of day and night. Research suggests that artificial light at night can negatively affect human health.

Kelsale-cum-Carlton – an island in the making

12.2 KcC is a tranquil rural area and light, noise and other pollutants from construction combined with the excessive traffic movements, will despoil it and significantly impact the health of all residents.

12.3 Light and noise pollution and the wide range of traffic-based nuisance will also threaten the many businesses within the Parish who largely rely on the tranquillity, dark skies and fresh air to sustain their hospitality trade (i.e., Holiday Cottages, Glamping, Caravan and Camping, Holiday Park, etc.).

Conclusion: We respectfully ask the Examining Authority to fully consider the excessive combined impacts of; the proposed SZC main site construction, the proposed SLR, the potential rail movements (day and night) and the unwarranted traffic nuisance on such a concentrated area – thereby effectively marooning residents of KcC on an island of despond for a decade or more!

13. Soils, Geology, Land Use

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To avoid adverse impacts on nationally important landscapes to avoid adverse impacts on landscape character quality and tranquillity, diversity and distinctiveness.](#)

13.1 The Suffolk Landscape Character Assessment defines the area as 'Rolling Estate Claylands Landscape Character' type.

13.2 Kelsale-cum-Carlton has an agricultural and farming history and continues to be a productive arable area, with some livestock interspersing it.

13.3 Some of the farms are certified organic enterprises, especially toward the north. Additionally, others are practising regenerative agriculture which enhances carbon levels in the soil.

13.4 The potential for destruction of the carbon cycling promoted in this farming system by a road building programme nearby, could potentially release significant amounts of embedded carbon into the atmosphere.

13.5 Many of the farms in the immediacy are viable smaller farms. A road, bisecting land holdings will potentially compromise their viability overnight

13.6 The UK is already short of smaller, more entrepreneurial farms and so this would have a disproportionate negative impact on the local economy.

13.7 Smaller farms are proven to have better management systems in place to support biodiversity and prevent further loss. Undermining the viability of the farming businesses in in KcC and neighbouring Parishes would have a much wider impact on the biodiversity of the area than just the land being sacrificed to the road itself.

13.8 Organic farming isn't just 'no pesticides' and 'no other pernicious artificial chemicals' Much of the pioneering work was undertaken in Suffolk by the founder of the Soil Association, Lady Eve Balfour.

13.9 At its heart is the understanding that healthy soil produces healthy plants and that it follows that whatever eats them, animal and human, will be healthy too.

13.10 Healthy soil is a living soil containing billions of organisms and there is a growing body of evidence that plants grown in it contain greater numbers of nutrients.

13.11 The life-cycles of healthy living soil also involve the absorption of large quantities of atmospheric carbon. This is the best and most natural form of climate change mitigation.

13.12 The farms referred to above are connected via miles of hedgerows, providing green highways for innumerable invertebrates, mammals and reptiles, as well providing varied habitats for birds and plants.

13.13 The farms also provide a local source of organic produce, mitigating the need for longer journeys to obtain food enjoying increased demand since the commencement of pandemic restrictions.

Conclusion: We respectfully ask the ExA to consider the total requirement and location of a Sizewell C Link Road whilst (amongst other issues) seeking to get clarity on:

- 1.** Why the Applicant failed to consult on construction traffic routing until Stage 3?
- 2.** Why, despite the obvious issues (resilience, topology, etc.) with the B1122 as their sole route to the Development Site, the Applicant persisted with portraying it as their preferred option for the early rounds of the Pre-Application Consultation?
- 3.** How the Applicant could ever have considered the B1122 suitable to carry construction traffic for a (unusually large and complex) project, twice the size of Sizewell B?

4. All the 'alternative route' analysis and decision-making processes that gave rise to the SLR proposal?
5. The efficacy of the route selection process
6. The engagement of AECOM to undertake a Peer Review of the Applicants route selection, noting their prior involvement with; SCC, Sizewell B, Hinkley Point C and their pre-existing relationship with the Applicant.
6. The extent of the Applicants engagement with relevant parties (i.e. HM Government, SCC, ES Council, Highways England, Department of Transport, etc.) regarding road traffic routing for their proposed Sizewell C
7. The Applicants reasons for not working across all the significant players to obtain an "all stakeholder agreement in principle" on the merits of a new East Suffolk Coastal route.
8. The extent of the Applicants engagement with other 'East Suffolk Energy Project' promoters and the degree of 'joint working' undertaken to examine the opportunities to reduce the cumulative impact of traffic on East Suffolk throughout the 2020's through to the mid 2030's
9. The efficacy of the Applicants proposals to safeguard East Suffolk's road network and communities in the event of a significant issue closing the A12 for an extended period, paying particular attention to all of the contingent actions affecting; workforce car movements, light commercial vehicle movements, bus movements, mail consolidation movements and any other categories not pro-actively managed by the Applicant.
10. The suitability of alternative routings identified by the Applicant for specific categories of traffic in the event of specific sections of the A12 and/or the SLR becoming unavailable for; short (<1hr), medium (2-24hr) and longer term (1 or more day) episodes.

Conclusion: The ExA are asked to be mindful of the results of a recent survey (March/April 2021) in: Middleton, Theberton and Kelsale-cum-Carlton as to whether the Link Road should remain or be removed on completion of SZC construction, should it receive consent.

The results show that 9 out of 10 responding Kelsale-cum-Carlton residents would prefer the SLR be removed on completion of the construction and that the agricultural use be reinstated shortly thereafter.

In context, in 2019 the KcCPC surveyed KcC residents regarding EDF's proposals (including the SLR) in our Parish (www.kelsalecarltonpc.org.uk/wp-content/uploads/2019/03/KcC-Survey-Response-1.71-FINAL.pdf) and a significant majority felt the location of the proposed SLR would impact them and local wildlife adversely and therefore did not want the SLR in the Parish. They also expressed the view that it would adversely impact the main economies of the Parish, particularly agriculture and tourism

They also strongly felt extensive mitigation should be provided for local road issues to reduce; noise and light pollution, improve air quality, provide adequate screening, etc.

A 'heatmap' of resident concerns can be found here: www.kelsalecarltonpc.org.uk/wp-content/uploads/2019/03/6-Final_Questionnaire-Heat-Map-Appendix-D-March-2019.pdf

Conclusion: In respect to KcC residential properties adjacent, adjoining or nearby the A12 and the proposed SLR, we ask the ExA to examine with the Applicant; acoustic screening as well as a screening bund to be provided as mitigations should the dDCO receive Consent for those properties affected for example Fir Tree farm .

We would also request that noise reduction tarmac should be laid both on the link road and throughout the A12 crossing the Parish especially near our hamlets such as Curlew Green, Dorleys Corner, North Green and Rendham Road. There should also be wide screen (as opposed to standard screen) planting of hedgerows including evergreen species (to act as a screen until native and slower growing species can catch up) and native tree planting to screen off the boundaries of affected properties such as Fir Tree farm and the compound. Existing boundary hedge lines also being thickened up as priority.

Nearby properties to the link road and adjacent to the A12 should be provided with triple glazing suitable for the type and listing of the property in advance of any work being undertaken to mitigate the effects of large volumes of increased traffic.

Nearby properties to the link road and adjacent to the A12 should be provided with suitable ear defenders in order to mitigate the effects of construction of a roundabout and link road and substantial increases in volumes of traffic.

In addition to which as before affected properties should also be offered air conditioning units should residents not be able to sleep due to a combination of noise generated from the project and the need to have windows open due to the heatwaves (as experienced over the previous few summers).

We are led to believe the work compound envisaged would stand well back from the A12 to avoid 'rubbernecking' but it is unclear where the entrance to it would be. There is a brow of a hill nearby on the A12 a blind spot where several serious crashes have occurred, the most recent on 21st April 2021. This area is also where deer migrate across the A12 from the coast to Simpsons Fromus Reserve and beyond as they have done for hundreds of years.

14. Water Quality and Resources

Appraisal of Sustainability: [Site Report for Sizewell - October 2010](#)

Objective: [To avoid adverse impacts on surface water hydrology and channel geomorphology \(including coastal geomorphology\) to avoid impacts on surface water quality \(including coastal and marine water quality\) and assist achievement on Water Framework Directive Objectives, to avoid adverse impacts on the supply of water resources, to avoid adverse impacts on groundwater quality distribution and flow and assist achievement of Water Framework objectives](#)

Micro plastics:

14.1 In the document *"The Sizewell C Project 6.7 Volume 6 Sizewell Link Road Chapter 1 Introduction page 4 table 1.1"* topics to be scoped out of requiring assessment for the proposed development are; marine historic environment, coastal geomorphology and hydrodynamics, marine water quality and sediments, marine ecology and marine navigation.

14.2 This is said to be on the basis that; the proposed development does not include any marine infrastructure and therefore there are no pathways which would lead to any likely significant effects on the marine environment.

14.3 However, the Minsmere Old River is adjacent to and crosses under the proposed SLR and many ditches in this area interconnect and run to the sea.

14.4 In light of a 2017 study published in 'International Journal of Environment Research and Public Health' and a more recent analysis by waste firm Suez with the consultancy Soenecs, it was found that thousands of tons of tyre micro plastics are washing into UK waters each year.

Potable water:

14.5 In East Anglia we are already in a "water stressed" area, and the extremes of weather are now very noticeable.

14.6 It is stated in the application that "...the principal supply for the Sizewell C project is unchanged from the original Site Water Supply Strategy and would come from mains water, provided by Essex and Suffolk Water. In order to provide security of supply and to ensure that all the requirements of the Sizewell C Project can be met SZC has continued to assess water supply options."

14.7 Our residents are also dependent on the same water supplier.

14.8 On the basis there is only one potable water transport option remaining in the options list (i.e. supplying potable water to the Sizewell Project via a new pipeline from Barsham), we believe given the limited options deemed viable (i.e. one), and outlined by SZC in their Site Water Supply Strategy, that the scheme should form part of the DCO application.

14.9 Essex and Suffolk Water has identified means to provide a viable supply of potable water to SZC.

14.10 The proposal provides potable water via a two-stage approach, providing a direct link from Barsham to Sizewell.

14.11 Supply would initially be 1.5Ml/d increasing to 3.5Ml/d to cover the peak SZC water demand during tunnelling.

14.12 The proposals would require an upgrade to some existing water treatment plants and a new high-capacity water main. SZC Co. continues to work closely with Essex and Suffolk

Water and the Environment Agency on the details of the scheme, how it would be funded and the programme for its completion.


14.13 This scheme would be provided by Essex and Suffolk Water and does not form part of the Application.

14.14 It is important to note that as an area we were classified by the Environment Agency as “seriously stressed” in 2013, an assessment that is currently being reviewed but is unlikely to have improved

14.15 Water stress applies both to the natural environment and to public water supplies. Both will be affected by climate change.

14.16 Public water supplies are under pressure from reductions in abstraction to make them more environmentally sustainable.

14.17 There is also a need to make public water supplies more resilient to droughts and meet additional demands associated with development and population growth.



The Environment Agency advises the Secretary of State that the areas classified as serious in Table 1, and shown on Map 1, should be designated as 'Areas of serious water stress' for the purposes of Regulation 4 of the Water Industry (Prescribed Condition) Regulations 1999 (as amended).

Table 1: Water company scores and classification

Water company area	Score	Classification
Essex & Suffolk Water	41	Serious
Folkestone & Dover Water	41	Serious
Southern Water	40	Serious
Thames Water	40	Serious
Three Valleys Water	40	Serious
Portsmouth Water	39	Serious
Sutton & East Surrey Water	39	Serious
Cambridge Water	36	Serious
South East Water	36	Serious
Mid Kent Water	36	Serious
Bournemouth and West Hampshire Water	34	Serious
Anglian Water	34	Serious
South Staffordshire Water	32	Moderate
South West Water	31	Moderate
Tending Hundred Water	31	Moderate

14.18 Northumbrian Water & Essex & Suffolk Water produced a document in 2019: 3.3.3 Suffolk Resilience Table WS2, extracts of which are below:

“Two of our treatment works in northern Suffolk are increasingly at risk of being unable to abstract sufficient volumes of water to meet demand. Barsham WTW and Ormesby WTW are currently both single sources of supply for the populations they serve (36,614 and 43,570 properties respectively). They are affected by different intake risks which are beyond management control.

The worst-case impact on service would be that a large number of customers could experience an extended supply failure, which could last for 3 days in the case of Barsham works because of a lack of strategic storage in the network. Some properties supplied by the works would lose supplies within 20 minutes of any kind of outage. A supply interruption affecting such a large population in a rural area would be beyond our ability to respond well to under the SEMD regulations.

The primary risk we are seeking to address relates to Barsham WTW. Barsham WTW abstracts from two sources. A series of boreholes typically abstract 56% of the total flow from groundwater

with the other 44% being taken from the River Waveney, but under peak demand conditions the surface water abstraction must flex and can increase to meet as much as 60% of demand. The River Waveney abstraction is a point of vulnerability because we have no bank side raw water storage to allow for changes in raw water quality. If a threat arises then abstraction from the river must be suspended and the treatment works must depend solely on the borehole supplies for a period. This could lead to a shortfall in supply.

A further vulnerability surrounding Barsham is that the customers who are supplied by the works have very limited protection, in the form of treated water storage, from any outage that may occur. Some do not have access to any storage at all and would lose supply in the event of an outage within 20 minutes. This means a supply interruption could last as long as three days. Outages at treatment works can take 24 hours to resolve depending on the cause. It may take a further 48 hours to fully recharge the network and restore supplies to all affected properties.

Water quality risks are also a factor with a treatment works that lacks final water storage. Maintaining water quality standards for our customers with a process that constantly has to react to demand is very difficult and we frequently have to manage flow changes across the treatment process in a 24 hour period to match the supply/demand profile of the network.

The level of flow fluctuation creates a pulsing effect through the works that increases the risk of water quality failures. Our operational teams constantly have to intervene manually to balance the treatment processes.

Wider context

It is also important to note the wider context in the northern Suffolk area. Suffolk is affected by significant seasonal demand variation because it is a popular holiday destination. It is also a water stressed area. This means there is the potential for unprecedented peaks in demand to arise and coincide with periods where water resources are at their lowest.”

14.19 This was therefore viewed as necessary prior to SZC considering it a potential option to resolve their water requirements.

14.20 It appears that beyond this, the Applicant has no ‘Plan B’, let alone a ‘C’. This parlous state concerns KcCPC greatly and must be resolved with a viable solution(s) embedded within the DCO.

<p>Conclusion: We respectfully ask the ExA to secure a specific condition within the DCO (should it be consented) that; a resilient water supply must be in place, prior to any work being undertaken at any of the; Main Development Site, Accommodation Campus or Associated Development sites.</p>
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15. Summary

15.1 The requirements of the AoS (2010) applicable to the Sizewell Site, when looked at in the context of the key objectives and the mitigation of the potential impacts on Kelsale-cum-Carlton Parish, can only be described as nothing short of woefully inadequate.

15.2 KcCPC are clear that irrespective of national need, the harm that will be inflicted on Internationally and Nationally recognised important ecological assets by the plans of the Applicant, now well exceed the threshold of acceptability.

15.3 Moreover, the impacts on 'local communities' (not up to 90 minutes travel distant) must be; fully understood and demonstrably fully mitigatable, prior to any consideration of whether the dDCO could be consented.

15.4 Our Parish Council has engaged in the consultation process since 2012 (see www.kelsalecarltonpc.org.uk/consultations for responses to 2, 3, 4 and the 2020 suggestions), during which we have endeavoured to put forward strategies for avoiding and mitigating impacts.

15.5 Throughout we have constantly been informed that the 'largesse' disbursed in Somerset would not be matched here. In fact a Councillor had it made clear to them that one of the key measures of success would be whether the total costs 'in monetary terms' were less than at Hinkley' Point C - currently estimated at £23 billion.

15.6 If this project does receive consent, it must certainly not be at the cost of local people, the countryside, all within it, that the communities are custodians of.

15.7 As a consequence of the impacts above we object to the proposed development and proposed location of the SLR in our Parish, and are of the belief it should be sited south of Saxmundham.

16. Sources

***1: Mr D Ireland**

1971. Left engineering and joined RSPB as a warden at Hornsea, Yorkshire - to start work on a new reserve
1974 - Transferred to Morecambe Bay to start a new reserve on the Bay running from Morecambe up to Westmoreland Border.

1977. Transferred to Dorset to start a reserve at Radipole Lake, in the centre of the town of Weymouth, later adding another reserve on the other side of Weymouth called Lodmoor.

1986 – Transferred to Minsmere and continued to travel round the country on H&S business for RSPB

2002 Retired but continued with sound recordings of birds and mammals, now being able to spend much more time on them.

2003 Moved to Kelsale. Continued with natural sound recordings and some work on H&S, to this day.

***2: Mr J P Bowdrey**

A lifelong naturalist, graduate of the University of London and Associate of the Museums Association, the author was employed by Colchester Borough Council as Assistant Curator and Curator of Natural History at Colchester Museums since 1987 and latterly as Senior Curator of Natural History at the former joint Colchester and Ipswich Museum Service, retiring in 2012.

As well as curatorial duties specialising in entomology, he was part of a team providing nature conservation advice on planning applications to Colchester Borough Council Planning Department. Since moving to Suffolk he has become a member of the Kelsale-cum-Carlton Biodiversity Group and publishes regularly on entomology with a special interest in cecidology

***3: Mr C R Cuthbert**

A lifelong naturalist, RSPB Minsmere long-term volunteer and wildlife guide, Qualified Teacher (Bath, 1969), B.Ed. (Bristol University, 1970), M.Sc. Ecology (Aberdeen University, 1972), Science Teacher at Wymondham College Norfolk (1973-74), Conservation and Executive Officer for Gloucestershire Wildlife Trust (1974-79), Countryside Manager and Conservation Officer for Hampshire County Council (1979 – 2010) – now retired

- The need for an outreach programme to support those that are furthest from the labour market to access employment opportunities associated with the development
- Concerns that local businesses may experience recruitment and retention difficulties, including wage inflation, skills shortages, and insufficient labour availability
- Concerns about the impacts of worker's families on local schools

2.3.1 The potential areas of impact on **tourism** that were identified include:

- Negative impacts on the tourism sector, supported by survey evidence, including traffic congestion, visual and noise impact, impact on the availability of tourism accommodation, impacts on rights-of-way, reduced availability of bedspaces for tourists, and cumulative impacts from reduced visitor spending. There were concerns that the negative impact on the tourism sector could be county-wide rather than just local, driven by wider impacts and negative perceptions associated with the whole county
- The need to maximise the potential benefits of a proposed visitor centre

Actual Impacts Arising

2.3.2 Construction at Hinkley Point C has been underway since 2012, and there are some differences between the anticipated and actual impacts.

2.3.3 There have been many **changes in the construction process** since award of the DCO, which is to be expected in a project of this size and complexity, but some of these have led to changes in the local economic impact that was anticipated. Changes in the project have meant that the methods and metrics for monitoring need to evolve as the project evolves. The overall timing of the project has slipped and some of the phasing has changed, which has meant that planned mitigation has not always been in place, such as the worker accommodation campuses, or slippages in highways mitigation being delivered at the same time as traffic increases related to development activity. Workers already engaged on the project have found accommodation in the local area, and it has been suggested that there is now less forward demand than expected for campus accommodation. Changes to plans for a jetty to enable deliveries by water have meant more HGV movements than were planned, and more abnormal loads than were originally anticipated. There have been higher levels of traffic congestion than were anticipated, which has had a negative impact on the local economy. There is no mechanism in place to compensate businesses that are affected by traffic congestion in the local area.

2.3.4 The **workforce profile on-site is expected to be different** to that set out in the DCO application. Significantly more people are expected on-site or in the local area at peak activity than was set out in the DCO application. It has been suggested that between 8,000 and 9,000 people associated with the development will be on the site or in the local area at peak, compared to the 5,500 on-site set out in initial plans. As well as resting workers, this number will include visitors and those undertaking short tasks, who are not considered as being employed on the site. A number of EDF Energy and supply chain staff are based in nearby Bridgwater and also in Bristol, and visit the site and local area regularly, adding to transport volumes. There have been problems accessing the main site due to transport congestion, with workers being stuck in traffic jams.

2.3.5 So far in the process there has been **significant interest from local residents in working on the project**, and a high level of employment of home-based workers, although this is a function of the type of work that is being undertaken. Site preparation and early stage civil engineering require less skilled workers, and these are being found in the local area. It has been suggested that home-