

Kelsale-cum-Carlton & Sizewell C (SZC)

This is a response to the Secretary of State's request for comment and is made by Kelsale-cum-Carlton Parish Council [KcCPC] on behalf of its 1,100 residents, Parish based businesses and its significant farming community. The Parish is just over 5 miles as the crow flies from the SZC site and is bisected by the A12.

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

Quotation from Anglian Water's website May 2022 *"The East of England, where Anglian Water operates, is the driest and flattest part of the country, making it particularly vulnerable to the increasing impacts of climate change. As these impacts become more frequent and severe, water scarcity, environmental capacity and flood risk are ever more important.*

These pressures are heightened by significant population growth and development in the company's region, with some of the UK's fastest growing cities and towns in East Anglia. Over the past three years, housing growth across council areas in Anglian Water's region has averaged 42,000 new homes a year, with the population forecast to increase by 940,000 people by 2040."

Extract of the Executive Summary of The Emerging Water Resources Regional Plan for Eastern England January 2022 *"The whole of Eastern England is now classified as 'seriously water stressed'. It is short of water now and if nothing changes that shortage will get worse. There is not enough water to go round now reliably nor to meet new demand for homes, for food or for energy or be resilient to the impact of climate change as it bites further and society adapts to it. Together with the now well recognised climate and biodiversity crisis, there is also a water crisis today..."*. *"When the well's dry, we know the worth of water"* Benjamin Franklin, 1746, Poor Richard's Almanac.

Extract from East Anglian Daily Times May 2022 *"Farmers are facing mind-blowing increases in what they are charged to apply for a licence to abstract water to irrigate their crops. As of April 1, a new regime has been brought in which means some farmers are looking at their water licence applications shooting up from just £135 to £18,308 – 140 times the previous amount and more than 2,000 times the rate of inflation, experts have warned. It follows a big government shake-up of water and environment rules. Farmers in drought-prone East Anglia – where many important and more irrigation-reliant crops are grown such as potatoes, carrots, onions, spinach, beetroot, parsnip, lettuce and asparagus – were braced for an increase. But once it came into force, they have been taken aback by the new pricing regime being implemented by the Environment Agency (EA)..... it is bound to affect ... work helping farmers move to more sustainable forms of water abstraction. We all know that Suffolk is one of the driest parts of the country and the Environment Agency tell us that it is suffering from too much water abstraction, needed to keep our taps running and to grow our food."*

To be brief, cutting to the more recent history of the last 3 years:

In **2019**: at a Community Forum SZC stated in respect of water supply issues it was *"intended for there to be no impact on local communities"*

January 2021: the DCO Application, stated, in respect of water supply, all was fine and having considered all the options for supply, the Applicant ruled out a (temporary) desalination plant because of its environmental impact.

March 2021, the Applicant stated to KcCPC *"We are confident that we can get that supply of water for the start of the construction period"*

August 2021 the Applicant proposed a temporary desalination plant conceding it was due to them discovering there was insufficient potable water for the project's, construction and operation.

October 2021 at the end of the Examination, the Applicant was unable to demonstrate that they had secured a permanent water supply for the proposed Development.

April 2022, the Applicant was still unable to demonstrate they have secured a permanent water supply for the lifetime of the project.

To summarise, having had 11 years to use their '*best endeavours*' to resolve this issue, in an area which is consistently amongst the driest regions in the country, the Applicant is relying on either taking Northumbrian Water to court or a permanent desalination plant, the long terms effects of which have not been fully assessed and which was ruled out by the Applicant last year as 'too environmentally damaging'.

In May 2022, the Applicant advises the Secretary of State that he should 'not be concerned' in respect of the potable supply, as there are options that they are examining for the lifetime of the SZC Project. KcCPC think otherwise and:

- would like reassurance that all its residents (whatever and whoever they are) will not suffer from water supply issues, as promised in 2019 by the Applicant due to SZC Construction and Accommodation.
- KcCPC believe that total transparency is essential (as is required from a Parish Council). Consequently, **all** costs, including those of Northumbrian Water (to upgrade infrastructure for any required water supply) should be calculated and published prior to any decision being made, thereby ensuring that any potential investors have due diligence and understand the real cost.
- East Suffolk residents should be told if they are carrying any financial burden for the SZC water supply.

2. Sizewell Link Road

Appraisal of Sustainability Site Report for Sizewell 2010 It was stated under 'Communities': "*4.26 Transport: The Sizewell area is not well served by major road transport links.*" Put simply, after 11 years, this has not changed.

KcCPC among many other local Parish Councils; view the route of the proposed SLR too northerly and that better routes with longer term legacy benefits exist south of Saxmundham. We also agree with Suffolk County Council that as proposed; the Link Road has no legacy and should be removed on completion of construction, with the 'lost' farmland being reinstated.

As a Parish Council we actually have engaged with our community and continue to do so. We have found clear and concise communications with our Parish helpful. We can supply to the Secretary of State if required copies of the questionnaires completed by our residents of their concerns about the Link Road and the impact on our area, from transport (especially the A12) biodiversity with long term detrimental impacts locally and at Minsmere, food production, tourism and concerns about pollution in all its forms. Lastly, our residents are concerned about their health and well-being as a consequence of the impacts of SZC.

3. Costs

As a Parish Council we have been consistently told '*value for money*' is a key issue for the SZC project and that one measure of success will be the project being cheaper than Hinkley Point C (HPC). HPC was said to cost 18bn in 2016, and more recently £23bn, an approximate increase of 30%. We understand its costs are being reassessed again, due to the Ukrainian conflict, Brexit, Covid supply chain disruption, material shortages and inflation; with new figures to be finalised by this summer, halfway through the current estimated construction time of HPC.

As a Parish Council who have participated in the DCO process we were told the estimated cost for SZC in 2020, was £20bn. It is a given this is going to rise substantially as since that time, there have been 22 changes to SZC's planning application including a new jetty/temporary beach landing facility, a water desalination plant and an increase in the quantity of materials required. Since then, on top of the Ukrainian conflict, Brexit & Covid supply chain disruption, there has been:

* a 25% increase in the cost of building materials since August 2020, according to BEIS

* Significant increases in the cost of fuel, changes to red diesel rebates (as applicable to the construction industry) and continuing rises in the rate of inflation. (According to BEIS & Bank of England forecasts).

This project, as per the dDCO, does not include all aspects fundamental to the build, for example water infrastructure and a high-volume potable water supply. In essence the total 'absolute' cost of the water issue isn't yet fully understood, let alone quantified, and therefore not included within estimates. Moreover, they never will be included within the SZC costs, as it is likely the new infrastructure will be undertaken through a separate DCO by Northumbrian Water (not the Applicant) with the cost probably borne by bill-payers, currently whom are living through "*a cost-of-living crisis*".

- KcCPC believe that the costs whether financial, environmental, or to the local (tourism/agriculture etc) economy are too high, that it will not be value for money and that other alternatives should be considered which would be more cost effective, less damaging and quicker in implementation.
- Is the cost issue not whether a SZC 'off plan' development is 'cheaper than HPC', but rather is it just too costly to this area, period?
- Do you just say 'enough' now, and look at better value alternatives? At the beginning of a potentially protracted 'cost of living' crisis, would this not be a more prudent and conservative course of action?

4. Biodiversity

October 2021: The UK is one of the world's most nature-depleted countries - in the bottom 10% globally and last among the G7 group of nations, new data shows: It has an average of about half its biodiversity left, far below the global average of 75%.... A figure of 90% is considered the "*safe limit*" to prevent the world from tipping into an "*ecological meltdown*", according to researchers.

Prof Andy Purvis, research leader at the Natural History Museum in London, said biodiversity is more than something beautiful to look at. "*It's also what provides us with so many of our basic needs,*" he told BBC News. "*It's the foundation of our society. We've seen recently how disruptive it can be when supply chains break down - nature is at the base of our supply chains.*"

A Government document published in 2018 "*A Green Future: Our 25 Year Plan to Improve the Environment*" states in Chapter 2: Recovering nature and enhancing the beauty of landscapes. At a glance we will:

- Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside.
- Conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed.
- Respect nature by using our water more sustainably

KcCPC Defer to RSPB and SWT for their expert knowledge but are aware there are significant threats to biodiversity by species, and in an area rich with diversity we are deeply concerned. The recently published "Defra Nature Recovery Green Paper: Protected Sites and species" first line is "*The proposals set out in this Green Paper support our ambitions to restore nature and halt the decline in species abundance by 2030.*"

Perhaps reconsidering turning the special place that is Suffolk, into one of the biggest building sites in Europe would be a good start!