



## KELSALE CUM CARLTON PARISH COUNCIL



The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

26<sup>th</sup> February 2020

Dear Sir/Madam

Re: EDF New Nuclear Build's Sizewell C nuclear power station proposal

I am writing on behalf of Kelsale cum Carlton Parish Council (KcCPC).

During the pre-application process for the above we have become increasingly concerned about the lack of environmental impact detail, as well as justifications for options chosen by EDF New Nuclear Build (EDF NNB). This has made it extremely difficult, or impossible in some cases, for KcCPC to assess whether the conclusions EDF have reached regarding impacts, option rejections and decisions within the avoid/mitigate/compensate hierarchy are appropriate, as insufficient evidence has been supplied during four public consultations.

We have asked for more detailed information at each consultation and pointed out our concerns in our responses to the consultations, but as each consultation has been released, we have found ourselves in a position whereby insufficient detail has been forthcoming. Now that pre-application public consultations are finished, we can only bring this to your attention and submit that we believe that the public consultation has been inadequate and has not met the guidance associated with the Planning Act 2008 nor the original or updated Statement of Community Consultation.

KcCPC remain unable to make informed responses to the Sizewell C (SZC) proposals that give proper consideration to the environmental and broader impacts and assessments associated with the development, as studies that were proposed over six years ago in Stage 1, and even earlier in EDF's Scoping Report, have still not been made available via the consultation process.

According to the advice from the Department of Communities and Local Government: 'Planning Act 2008: Guidance on the Pre-application Process':

*The front-loaded emphasis of consultation in the major infrastructure planning regime is designed to ensure a more transparent and efficient examination process. (6.)*



## KELSALE CUM CARLTON PARISH COUNCIL

This document also refers to section 50 (3) of the Planning Act 2008, which makes clear that applicants 'must have regard to any guidance under this section' (i.e. pre-application procedure).

Without such front-loading of evidence within the consultations, it has not been possible to assess whether appropriate avoidance/mitigation/compensation strategies have been identified and agreed at an early stage.

Baseline information material and surveys are referred to in the Preliminary Environmental Information documents, but these have not been made available during the consultations despite requests and we are told that these will only be made available at publication and acceptance of the Development Consent Order (DCO). As a result, KcCPC are of the opinion that the pre-application procedure has not been transparent.

In order to make an informed response to proposals presented during EDF's pre-application consultations, insufficient detail in its preliminary environmental information has been provided to comply with the guidance on conduct of a National Strategic Infrastructure Project (NSIP).

Suffolk County Council (SCC), East Suffolk Council (ESC), Environment Agency and others have all commented on the paucity of information made available by EDF NNB for respondents to make informed responses throughout the four-stage consultation period.

Paragraph 19 of the above pre-application guidance document, states:

*A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues.*

As a Parish Council, we have limited resources to scrutinise complex proposals such as this for one of the largest construction projects ever contemplated in the UK. As a result, it is vitally important that EDF provide clear and well organised information on their pre-application consultations so that organisations such as ours can come to an informed position. We have raised many issues where we have requested information or invited joint discussions some examples of which are below:

At Stage 2 we stated:

*3.2 e: KcCPC wish to make it clear that as a consequence of the relatively short consultation period... and a combination of: -limited access to suitably qualified resource -no SZC Critical Path Analysis, Key Milestone Plans, Outline Programme and Workstream Project Plans it has not been possible for KcCPC to assimilate a complete picture of the detailed phasing of the Programme components, their potential macro and micro impacts, contingent actions or unforeseen consequences, both planned and encompassed by the consultation.*

*4.2 iv: KcCPC recognise that the proposed utilisation of rail transport for bulk materials potentially make a significant contribution to reducing road traffic HGV journeys and their impact on roads, environment and communities in Coastal Suffolk. Were proposals for rail freight traffic to be reduced and as a consequence HGV journeys increased, KcCPC wish to be invited to participate in joint*



## KELSALE CUM CARLTON PARISH COUNCIL

*discussions with both SZC and the other potentially impacted Parishes, on those revised proposals, as a matter of urgency and without delay, pending the formal Pre-application Consultation Process.*

*4.3: ...KcCPC wish to be clear on one point in respect to the Maritime Transport proposals and seek appropriate reassurances from SZC on future discussion and consultation, specifically KcCPC recognise that the proposed utilisation of marine transport for bulk material potentially makes a significant contribution to the reduction of road traffic HGV journeys and their impact on roads, environment and communities in Coastal Suffolk. Were proposals for marine freight traffic to be reduced and as a consequence HGV journeys increased, KcCPC wish to be invited to participate in joint discussions with both SZC and the other potentially impacted Parishes, on those revised proposals, as a matter of urgency and without delay, pending any formal Pre-application Consultation Process timeline*

*5.5: KcCPC is concerned about the paucity of information in respect to the potential impacts on the everyday lives of KcC residents and businesses brought about by the scale of demand on various utilities, amenities, commodity and general services.*

*6.2 KcCPC wish to be clear on four points in respect to the foregoing points and seek appropriate reassurances from SZC on future discussion and consultation, specifically:*

*i] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impacts on the people, flora, fauna and environment of the locality, that increased diesel powered road traffic will bring.*

*Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of pollution on the people, flora, fauna and environment of KcC.*

*ii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impacts on KcC residents right of enjoyment of the amenity afforded by the A12, B1122 and surrounding roads in the event of road closure resulting from any of the above or other SZC driven events. Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with detailed proposals to minimize and mitigate the direct and indirect impacts of road closure resulting from any of the above or other SZC driven events.*

*iii] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning and makes mention of 'other routes' that can be utilized by SZC in the event of the A12 & B1122 route becoming impassable, there seems to be little or no detail of these routes. Consequently, KcCPC are unable to make comment or focus on the consequences*



## KELSALE CUM CARLTON PARISH COUNCIL

(foreseen or unforeseen) and mitigation of the direct and indirect impacts on KcC residents right of enjoyment of the amenity afforded by the roads surrounding KcC in the event of road closure forcing SZC to utilise 'other routes'. Consequently, KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with the detailed proposals of the 'other routes' and proposals to minimize and mitigate the direct and indirect impacts on KcC of their use as an alternative to the A12 and B1122 route, short, medium or long term.

iv] KcCPC are concerned that whilst the Stage 2 Pre-Application Consultation documents speak of extensive traffic modelling and planning, there seems to be little or no focus on the consequences (foreseen or unforeseen) and mitigation of the direct and indirect impact on emergency service vehicles (Ambulance, Fire, Police & Coastguard) responding to urgent requests along the A12, B1122 and surrounding roads. In an area where Ambulance response is already severely strained, KcCPC are concerned that the traffic saturation of the A12 and B1122, along with concomitant increases in traffic on the surrounding roads and lanes may threaten the health and potentially the lives of KcC residents, visitors and workers. KcCPC seek reassurance that prior to Stage 3 Pre-Application Consultation, SZC will be coming forward with the detailed proposals to minimize and mitigate the direct and indirect impacts on emergency service vehicles responding to emergency situations and using the A12, B1122 and the surrounding roads and lanes of KcC.

Consultation Questionnaire Section

**7. Transport Overall Strategy, (also 3 Road Traffic Movements) Air Quality:** KcCPC is concerned at the paucity of usable air quality data contained in the SZC Stage 2 Pre-Application Consultation Documents in respect of the impact both on the A12 and B1122 route, and also the propagation of pollution that extends laterally from the immediacy of the route. KcCPC seeks urgent resolution of this omission and an early meeting with SZC to understand the potentially damaging and detrimental impacts on Kelsale, its residents, schoolchildren, businesses, flora, fauna & environment

14. **Consultation Process:** KcCPC welcome the 3 Stage Consultation approach, but within that have found the detail lacking in some of the proposals put forward. Consequently, it has been very difficult to respond in a substantive way to both overall questions on the proposals and identification of the specific impact of proposals on Kelsale cum Carlton and its residents. Moreover, it would have been (and still could be) very helpful if the source analysis and detailed documents could be made available to Parish Councils (possibly through a secure online capability) to enable a more focused and informed response to have been made.

In addition to this we requested reassurance about water, potable and foul. We have suggested reducing impact by contractual car sharing in our responses and also at a Sizewell Community Forum a view dismissed by EDF as being 'harsh' simply for putting the impact on the environment and the health and well being of our residents first. We also asked what measures would be put in place to avoid single track lanes being clogged and impacts on weight limited bridges. We have asked what due diligence has been carried out on the A12, the sole artery through Suffolk which is maintained



## KELSALE CUM CARLTON PARISH COUNCIL

by Suffolk County Council for all road users to sustain the volume and weight of forecast traffic. This list is not exhaustive.

We said "the consequence is, that in this response Kelsale cum Carlton perceive a need to meet with SZC prior to Stage 3 Pre-Application Consultation to fully understand proposals that remain unclear after our Stage 2 submission and prior to Stage 3 Consultation commencing." That did not occur, nor did we receive the information needed to respond.

At Stage 3

We reiterated the points above and on page 7 of a 187page response:

*1.7.3 KcCPC is gravely disappointed that despite proposals coming forward in the Stage 3 Consultation, directly impacting a significant group of Kelsale cum Carlton residents and indirectly many more – EDF energy failed to schedule a "public exhibition" in Kelsale cum Carlton, unlike many other directly impacted Parishes. Moreover, rather than naming Kelsale cum Carlton as a directly impacted Parish, the EDF Stage 3 documentation largely refers to the impacted area as "...South of Yoxford...". Given the preceding comments (1.7.1 above), KcCPC would like to point out to both EDF Energy and the Planning Inspectorate that KcCPC believes these instances are indicative of broader issues relating to; a lack of local knowledge and are also symptomatic of the undue haste with which some of these proposals have been brought forward.*

More examples:

*Point 2.4.2,3,4,5and 8 all ask further detail from EDF Energy.*

*Page 19 3.7.3 KcCPC note with interest that EDF Energy assert that "...Balancing the environmental sensitivities and local effects with the need for the development of a NSIP calls for a thoughtful approach to the design and implementation of the project, informed by a full understanding of the environmental qualities of the area." We are still waiting to have a full understanding of full impact.*

and,

At Stage 3 the Sizewell link road appeared as a completely new aspect to the Consultation having never been mentioned previously.

### *10.5 Justification for Route Selection*

*10.5.1KcCPC note the content of the paragraph KcCPC is shocked at the brevity, lack of detail and the absence of an underpinning rationale in Section 10.5. It seems clear that EDF Energy have decided very late in the day, that their previous B1122 approaches were flawed and presumably as an expedient have assembled a hastily pulled together 'Plan B'. The result is a less than compelling melange of options, none of which have been extensively researched or have anything substantial to commend them.*

*In December 2019 we were given sight of the 'peer' review of the route:*

*AECOM state they were "... to undertake **an independent selection process** to provide an independent opinion of the preferred option for the SLR." The process for this is unclear, outside*



## KELSALE CUM CARLTON PARISH COUNCIL

*rather arcane 'weightings' being applied to unquantified, immeasurable and/or benchmarked criteria.*

*From a statistician's point of view, the use of a '5 point' based model seems highly questionable, even without access to the specific underpinning 'weighting' components and attributes. The accompanying enumerating schedules are also absent.*

*Methodology 2.2 indicates that in addition to the publicly available EDF Energy Stage 3 Pre-application Consultation Documentation, the review appears to rely solely on printed reports produced between 1987 and 1989 by Trevor Crocker and Partners in respect to Sizewell B, and another AECOM authored report in 2015. Against the backcloth of a completely different scale and materials handling strategy for Sizewell B, it is questionable as to how pertinent and relevant this approach is for a 2020-2035 project? Moreover, the absence of any current 'independent' materials seems wholly questionable*

It was stated that Stage 3 was to be the final stage of consultation (open to the end March 2019) but at very short notice over the summer holiday period in 2019 EDF NNB did enter into a further pre-application consultation.

We asked EDF to clarify many aspects of the project and to provide information which has been requested over 4 consultations. So much is still lacking despite them having had 6 years to prepare but again we made time, and put together a detailed response highlighting 71 Issues and called upon them to provide evidence and clarity.

At Stage 4 we stated:

*1.12 EDF has told us on many occasions that some information has always been withheld (such as the report on the Sizewell Link Road and alternatives) because they did not wish to overload the local community with information. However, as all this additional data has to be released at the point the Development Consent Order is submitted, the local community will be faced with a gargantuan task to sift through all of the documents and will be overloaded, precisely the opposite of what EDF supposedly would wish to happen. As a result, we believe EDF have still not satisfied their Statement of Community Consultation or followed the National Policy Planning Framework in spirit and have evaded communities' expectations to have a constructive dialogue based on proper consideration of evaluations and reports into the various aspects and impacts that this development will entail.*

and,

*13.3 We support ESC and SCC in their response which states "the combined evidence of Stage 3 and 4 still remains insufficient for the Councils to fully evaluate the adequacy of the proposed mitigation proposals and to reach a final conclusion with regard to the development as a whole."*

This consultation introduced some adjustments to the proposed Sizewell Link Road and Theberton Bypass proposal and visited a smaller subset of locations with Consultation Exhibitions. However, no exhibition visited Kelsale cum Carlton whose Parish is bisected by the A12 causing separation and which will be affected greatly by this proposal and the exhibitions that did occur were confined



## KELSALE CUM CARLTON PARISH COUNCIL

mostly to daytime hours when a significant part of the population would be at work. EDF NNB's lack of transparency and willingness to provide adequate detail to us during Stages 1 through Stage 4 as statutory consultees, has prevented us from making an informed response to the consultations. As a result, we believe that a (DCO) application has not reached an appropriate stage for examination by the Planning Inspectorate.

The official guidance states under paragraph 15:

*Effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State.*

KcCPC are of the opinion that as the second Scoping Report was clearly written in parallel to the Stage 3 Consultation documents:

- there was insufficient time following closure of the Stage 3 Consultation For EDF NNB to have adequately reflected on feedback obtained from the consultation
- subsequent inclusion of a third transport strategy was not submitted in the scoping report
- the realisation that the 5,600 maximum on-site worker numbers are likely to be increased to 7,900 and that this is not reflected in any Scoping Report

EDF NNB should be required to submit a further Scoping Report and request for opinion based on M

Following that, a further consultation should be entered into with statutory consultees and the public where these changes are properly described and quantified, with impact assessments and proposed mitigations clearly described.

We note that under point 19 of the official guidance, it is stated:

*Without adequate consultation, the subsequent application will not be accepted when it is submitted.*

We contend that the public consultation has lacked rigour and, as an exercise in allowing the public to make informed comment on proposals, has failed to meet official guidance or the objectives contained within the Statement of Community Consultation and in terms of the potential maximum worker numbers has been inadequate and misleading.

We feel it is important that we raise these concerns now and urge you to take them into consideration whenever EDF NNB decide to submit their SZC DCO application.

Yours faithfully

Marie Backhouse

Marie Backhouse  
Clerk to Kelsale cum Carlton Parish Council



## KELSALE CUM CARLTON PARISH COUNCIL

Copies to:

EDF Energy - Sizewell C

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