

**Kelsale-cum-Carlton Parish Councils written submission in response to the
Applicants reply at D5 to KcCPC's Written Representation at D2.
For Deadline 6, 6th August 2021**



The Applicant agreed to review KcCPC's submission (REP2-351) at D5, with the exception of Section 6 Biodiversity & Ecosystems which will be addressed by the applicant at D6. This is KcCPC's response to the Applicants' comments either specifically in respect to our Parish or where we have been referred elsewhere:

The numbers below reference the sections of REP2-351

5. Air Quality

As stated previously KcCPC believe there will be at least 8,500 workers, with the build being at least 12 years.

The cumulative impact of this and other projects in the area will increase traffic and concomitant impacts in our Parish. See also point 8

6. Biodiversity & Ecology

KcCPC note that the Applicant will comment on this section at D6. A copy of the D2 report from KcCPC has been forwarded to the Environment Agency for their information, in addition to East Suffolk District Council & Suffolk County Council.

KcCPC would also wish to highlight that not far from the proposed SLR junction from the A12 in our Parish, rare Suffolk Punch horses are in a breeding programme.

7. Climate change

Put simply The Sizewell C Project on its own will cause huge damage with habitat destruction etc. It is past its sell by date, and most definitely fails the 'urgency card' so oft quoted by Mr Phillpot QC. Consultation started in 2012 (10 years ago!) and it is still being consulted on. It will be too damaging to the environment, place too much stress on the area, and be far, far too late. This is evidenced below with extracts sourced below from www.theccc.org.uk in respect of the document: 'The Adaptation Committee's Independent Assessment of UK Climate Risk' which sets out the priority climate change risks and opportunities for the UK and was published 16th June 2021.

The UK is experiencing widespread changes in the climate; average land temperature has risen by around 1.2°C from pre-industrial levels, UK sea levels have risen by 16cm since 1900 and episodes of extreme heat are becoming more frequent. (Source:CCC)

Baroness Brown, Chair of the Adaptation Committee said:

"The severity of the risks we face must not be underestimated. These risks will not disappear as the world moves to Net Zero; many of them are already locked in. By better understanding and preparing for the coming changes, the UK can prosper, protecting its people, its economy, and its natural environment. A detailed, effective action plan that prepares the UK for climate change is now essential and needed urgently."

UK-wide, nearly 60% of the risks and opportunities assessed in the 1500-page report have been given the highest urgency score. The CCC identifies eight priority risk areas which need immediate attention, at the latest in the next **two** years (ie 2023):

1. Risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
2. Risks to soil health from increased flooding and drought
3. Risks to natural carbon stores and sequestration from multiple hazards, leading to increased emissions
4. Risks to crops, livestock and commercial trees from multiple climate hazards

5. Risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
6. Risks to people and the economy from climate-related failure of the power system
7. Risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
8. Multiple risks to the UK from climate change impacts overseas

The report says there are strong benefits from taking effective adaptation action. The assessment identifies a range of steps that will have benefits in the next **five** years (ie to 2026) if implemented on a wide scale, such as building design and retrofit, habitat creation and improved access to information on climate impacts. Importantly, while the changing climate also creates some opportunities for the UK, these do not offset the risks and also require early action to realise.

“Action to improve the nation’s resilience is failing to keep pace with the impacts of a warming planet and increasing climate risks facing the UK. That is the conclusion of a comprehensive independent assessment led by the Climate Change Committee (CCC) which considered a catalogue of risks and opportunities affecting every aspect of life in the UK.”

This advice to the Government from the 3rd UK Climate Change Risk Assessment, basically means it’s time to look at Plan B.

8. Communities: Population, Employment & Viability

Blight

We acknowledge sight of some information relating to the Property Support Scheme, which we initially understood was very limited in respect of the properties to which it would apply, but was updated in October 2020. Could the applicant confirm that this support scheme will apply to all the properties listed in this document, and if not provide clarification on the basis of who is eligible and who would be excluded and why. Could a copy of the most recent document of the Scheme be supplied please? Once this is clear we will communicate with residents in our Parish so they are aware of what may be available.

Since 2012 KcCPC and other Parish Councils have been consistently informed that there will be no 'largesse' in this area of Suffolk because a marker of success of the project is costs must be lower than HPC. We are also informed the plan is a replica of HPC, but understand the compensation to homeowners there was more generous, is the basis of the two schemes different and if so why?

Tourism

Could the Applicant supply a link to the document which clearly lays out the basis on which claims to the Tourism Fund could be made, in order that we can communicate this information to such businesses in the Parish. On a similar basis the information on the Tourist Accommodation element of the Housing Fund.

Please note that KcCPC do not believe that housing SZC's workforce equates to tourism.

Noise, Pollution & Vibration mitigation & Compensation

Road proposals

With limited resources, we have found it very difficult to navigate the Applicants labyrinthine documents. If this has been missed by KcCPC we would be grateful if you could provide the link to where potential impacts of the above (including particulates) have been assessed by the Applicant in respect of the following adjacent properties* in our Parish:

Well Cottage

Home Port

The Oaks

Hall Farm

Hedgehogs

Greenacres

Benstead

Lynwood

Parkgate Farm

Detainia

Glenside

Laurel Farmhouse

The Farmhouse B&B

Mile Hill Gallery & Barn

Lodge Farm

Lodge Cottages (Foxen & Lodge Cottage)

Rosetta Cottage

Fir Tree Farm

Buskie Farm

Kelsale Place

Properties in Rendham Road and Curlew Green/Dorleys Corner particularly but not exclusively:

Farm View, Curlew Green

Green Acres, Curlew Green

The Walnuts, Dorleys Corner

Dorleys, Dorleys Corner

Brook Cottage, Dorleys Corner

Bankside, Dorleys Corner

Wayside, Dorleys Corner

Monza, Dorleys Corner

Rail proposals

With limited resources, we have found it very difficult to navigate the Applicants labyrinthine documents. If this has been missed by KcCPC we would be grateful if you could provide a link to where the potential impacts of the above (including particulates) have been assessed by the Applicant in respect of the following adjacent properties in our Parish:

The Bungalow, Clayhills Road

Cottage Farm Clayhills Road

Hill Farm, Clayhills Road

Hill Farm Cottage, Clayhills Road

Red Cottage Farm, Clayhills Road

Oak Tree Farm, Clayhills Road

The Barn, Oak Tree Farm, Clayhills Road

Red Poll Barn, Clayhills Road

Carlton Cross, Main Road

Carlton Rookery Cottage, Clayhills Road

Carlton Rookery, Clayhills Road

Rookery Orchard, Clayhills Road

1 Rookery Farm Cottages, Clayhills Road

2 Rookery Farm Cottages, Clayhills Road

By The Crossways (East Green/Theberton Road/Saxmundham Road junction)

Gardeners Cottage (as above)

White House Farm Lowes Hill

Bridge Farm Lowes Hill

Orchard House Lowes Hill

Spinney Pocket

In addition to the Conservation Area (noise pollution is also promulgated along East View) parts of the Beaumont Estate & Kelsale Primary School.

*We have supplied a list of listed properties at D2

9. Communities: Supporting Infrastructure

As a Parish Council in the absence of a more sustainably located Link Road south of Saxmundham (and one which would provide an 'escape' route rather than bringing traffic to the same point) are supportive of the proposal for a Bridge at Pretty Road, although of course would prefer not to have this rather precious area of Suffolk affected at all, and to have to consider such choices.

In that context, the location of the proposed SLR also gives rise to the potential of rat running through our Parish for example (but not exclusively) via Town Farm Road but also via Fordley Road (in Middleton-cum Fordley) from the SLR. The Parish Council have flagged this issue in the 2 meetings with the applicant this year and mentioned it in several submissions. We have also communicated with residents who would wish a solution to be found that enables small volumes of local traffic to move as it does now but avoids SZC related traffic (whatever form it takes) and displaced traffic caused by volumes of traffic using this route.

We understand that options such as stopping up Fordley Road (south) have been suggested and also some form of bridge is currently being considered. We have also heard the applicant talk about some kind of fencing to discourage some potential users as described above, and understand comments have also been made about signage for Local Traffic only.

KcCPC and McFPC have both worked together (separate to any SZC impacts) to facilitate 'Quiet Lanes' and create a network with the objective of encouraging mixed road use and sustainable travel connecting local Parishes (also with Theberton) and not severing them, which is what we as Parishes are reluctantly being forced to consider here.

As a Parish Council we believe leaving Fordley road as is, is not acceptable and would wish the ExA to request the applicant to create a solution to the design issue of their creation.

9. Human Health & Well being

Emergency Plan – we remain unpersuaded that with the cumulative volumes and types of traffic on the road it would be possible for our Parish to access the A12 to safely evacuate in the event of an emergency.

Access to health services – we remain unpersuaded with cumulative volumes and types of traffic on the road that the ease of access of residents for such services will not be impacted. We still remain concerned that the quantity of workers will have an impact on demand for health services, as although there are plans for medical services on site, undoubtably the NHS would be called on for certain aspects of healthcare.

Could the Applicant clarify the ease in which a cyclist will be able to cross over the SLR when volumes of traffic will be travelling at 60 mph to enjoy our 'Quiet Lanes'? Likewise, horse riders and pedestrians.

11. Cultural Heritage Assets

The Applicants choice of location for the SLR, puts at risk KcCPC's cultural heritage assets.

12. Landscape – Dark skies and loss of tranquillity

The Applicants choice of location for the SLR, puts at risk KcCPC's dark skies and tranquillity with knock on consequences.

13. Soils, Geology & land use

Insulation & rehousing

KcCPC do not believe that the offer of insulation or rehousing for properties within 300m of a new or altered highway is sufficient. KcCPC would be grateful if the applicant would clarify what is being offered as it is unclear from the June 2021 document REP-034.

Air conditioners

KcCPC also flagged the provision of air conditioners for residents affected by noise. This is particularly relevant for those impacted by noise in the summer where they would normally choose to open a window to let heat escape. As so many are working from home as a consequence of the pandemic it is important residents are able to continue with their daily lives.

Ear Defenders

KcCPC notes that ear defenders were offered at HPC and would therefore argue that they should be offered here. These should be provided to any individual who is adversely impacted by the increased and ongoing noise of the development and traffic. There are good quality ear defenders that people find sufficiently comfortable to sleep in, so in order to avoid constant sleep deprivation, the correct quality ear defender should not only be assessed, but be made available to anyone who is impacted. Also, with the increasing need and popularity of 'working from home', ear defenders would also help aid concentration during excessively noisy traffic/building noise.

Quiet Road Surfaces

KcCPC notes that quiet road surfaces for new roads remain under discussion with Suffolk County Council, but believe that the same surfacing should also be used on the A12 especially near roadside communities such as on KcC's old 'Main Road' on the A12 - by Curlew Green/Dorleys Corner/North Green/Carlton Road South and Rendham Road. No doubt other Parishes would wish to have the same measures to reduce the noise of increased volumes and types of traffic.

Acoustic Screening, Bunds & Hedge Planting

For nearby roadside communities such as Curlew Green/Dorleys Corner/North Green/Rendham Road/Carlton Road (South) KcCPC believe that acoustic screening, bund and where natural barriers are appropriate wide screen hedge planting should be put in place.

14. Water Quality & Resources

Potable water

KcCPC have raised concerns about potable water for several years. We read with interest the letter from Walker Harris LLP dated 23rd July 2021, noting the water supply requirements for SZC have materially increased and are still not fixed, thus meaning a water supply cannot be guaranteed without affecting residents and the environment. So, with no advance notice we are now in the Consultation period for a Desalination Plant, it's a good thing we all have nothing else to do with our lives.

We understand that this will use SZB for energy, but are unclear how planned and unplanned outages would affect this, likewise the consideration to using SZB for Hydrogen production.

Without wishing to pre-judge the conclusions of KcCPC in responding to this consultation, it could be observed that if it is found not to be environmentally damaging (that unlike the SLR) the desalination plant should be left as a legacy asset for the benefit of Suffolk, with running and maintenance costs being picked up by the Applicant.

Micro plastics

Due to the choice of route for the SLR, KcCPC remain concerned about the likelihood of microplastics from tyres on the SLR feeding through the water courses and then on to the North Sea, particularly bearing in mind the 'connection' to Minsmere via the old river. Please note at some times of the year some watercourses/rivers will appear dry, but that is not always the case.