



Submission at Deadline 1
Comments on Relevant Representations
On behalf of Marlesford Parish Council

Regarding

NNB Generation Company (SZC) Limited

DCO Application

For

Sizewell C New Nuclear Power Station and Associated Works

Lord Marlesford
Chairman
Marlesford Parish Council

Melanie Thurston
Parish Clerk

12th May 2021

Interested Party No.

20025903

1. Introduction

These are the comments of Marlesford Parish Council on specific aspects of Suffolk County Council and East Suffolk Councils' Relevant Representations. The comments on A12 issues and the Two Village Bypass are also endorsed by Little Glemham Parish Council.

2. Comments on Southern Park and Ride

a) Suffolk County Council (SCC)

- i. At para 36 SCC states *"The Council is in particular aware of local concerns around landscape impacts at the Southern Park and Ride site. The Council will provide further comments on all Associated Development sites in our Local Impact Report and seek improvements and mitigation of any impact where it may exist"*. These local concerns have been expressed by Wickham Market, Hacheston, Campsea Ashe and Marlesford Parish Councils and they relate to the siting of the Southern Park and Ride (SPR) on a prominent ridge between the valleys of the Rivers Ore and Deben both of which have had Special Landscape Area status. Local residents have particular concerns about the omission of various viewpoints from the Applicant's LVIA. Concerns remain over the detail of planting and screening of the SP&R.

b) East Suffolk Council (ESC)

- i. At para 2.169 ESC states *"We request for buses associated with Sizewell C to be zero-emission or ultra-low emission bus technology, to minimise the air quality impacts of the bus fleet. No further information on this is within the draft ES"*. We agree with ESC on this but believe that they should go further and explicitly state that all buses using both the Northern and Southern Park and Rides must be electric.
- ii. ESC at para 2.175 states *"The Council supports the principle of the southern park and ride in this location and the access to and from. There are details in relation to the design that will need addressing but we are confident that these can be covered predominantly with requirements"*. For the reasons stated above in 2 a) i we disagree with ESC's conclusions both on choice of site and mitigation. We have yet to see detailed landscape plans that would satisfy us that the SP&R will be adequately screened, will have a low impact on night-time skies and will leave a meaningful landscape legacy.
- iii. ESC make no reference in their Relevant Representation to viewpoints affected by the SP&R. We contend that in addition to those viewpoints specified in the Applicant's ES, a number of additional viewpoints have been omitted and we believe that the ExA should require the Applicant to revisit the LVIA.

3. A12 Issues Including Two Village Bypass

a) Suffolk County Council

- i. We are pleased that SCC at para 17 state *"It should be noted that, due to the distance of Sizewell C to the Strategic Road Network being noticeably greater than either at Wylfa or Hinkley Point C [see table below for comparative distances], any HGV traffic will place greater strain on the local road network in Suffolk, including greater potential for light vehicles to divert away from the main access roads (A12 and B1122). The route to Sizewell C passes through several settlements such as Yoxford, Little Glemham and Marlesford, and significantly goes very close to a number of larger urban areas, Martlesham and Woodbridge. In comparison, whilst the route from the M5 to Hinkley*

Point C passes through the suburbs of Bridgewater, and it is noticeable that the main route to Wylfa passes few some villages but no significant urban areas". We welcome this observation, but we feel the full impact of additional HGV, LGV and car traffic on the A12 through Marlesford and Little Glemham has been underestimated by the Applicant and both Local Authorities, particularly when the cumulative impact with EA1n and EA2 is considered. It should be noted that Marlesford and Little Glemham Parish Councils are in discussions with the Applicant and SCC on A12 mitigation measures to be funded through the s106 – to date we have had no confirmation from the Applicant on what measures they intend to include in their package, although further meetings are scheduled.

- ii. At para 50 **Noise, vibration and air quality impacts of HGV / Road Transport Movements** SCC states *"The large number of additional HGVs will significantly impact local communities, in terms of noise, vibration and air quality. Roads are currently very quiet at night-time, with an increase of HGVs at night-time (or in the late hours of evening and early hours of the morning) being very noticeable. The main HGV route passes several significant residential areas which are not proposed to be included in mitigation, including Yoxford, Little Glemham, Marlesford, Woodbridge and Martlesham. The Council expects additional mitigation and compensation to be required for these locations. The Council has some concern that the applicant proposes the timing of HGV movements being controlled at the main gate only and hence, whilst times of arrival and departure would be controlled, HGVs would be free to travel through local communities at any time of the day or night".* We share the Council's concerns, and we will be asking that the Applicant carries out baseline studies in Marlesford and Little Glemham on noise, air quality and vibration. We argue that this is necessary in order to facilitate proper monitoring of these issues if/when the SZC project starts.
- iii. Of particular concern to the residents of Marlesford and Little Glemham are the dangers to pedestrians of crossing the A12 in the two villages. At para 152 SCC notes *"According to the applicant, the developments are close to triggering a Moderate Adverse Impact on Fear and Intimidation through the villages of Little Glemham and Marlesford and, prior to delivery of the Two Village bypass, Farnham and Stratford St Andrew. According to the applicant's assessment this would be triggered at 2,000 HGVs and impacts of approximately 1,950 have been assessed. It can be considered that this impact needs to be considered also without the in-combination effect, as it is not realistic to suggest that a 50 HGV difference across 18 hours would suddenly trigger an arbitrary threshold; especially on communities such as these where footways are often narrow and properties face directly onto the highway".* This level of traffic will become unbearable for those living in close proximity to the A12 and is further justification of the need for a Four Village Bypass (FVB). In a recent letter of support, Suffolk's Police and Crime Commissioner highlighted the dangers on the A12 through the two villages – the letter is attached with this submission.
- iv. Marlesford and Little Glemham have long campaigned for a full, FVB. The Two Village Bypass (TVB) proposed by the Applicant only solves halve of the problem and leaves Marlesford and Little Glemham exposed to the full implications of the cumulative impact of Sizewell C and EA1-N and EA2 traffic. We fully understand the comment of SCC at para 43 that they consider the proposed route to be the "least-worst option". This confirms the view that the proper solution to the traffic difficulties faced by Stratford St Andrew, Farnham, Little Glemham and Marlesford is a FVB. We believe that SCC should be more creative in finding a comprehensive solution at a time when the Applicant will be making a major contribution to the Farnham and Stratford section. We also believe that in accepting the proposed alignment of the TVB

that it will almost certainly preclude the delivery of a bypass of Little Glemham and Marlesford at a later stage.

- v. Further, SCC acknowledge that they have concerns about the impact of the TVB on Foxburrow Wood County Wildlife Site. These concerns could be overcome and the impact on residents in Farnham lessened if the route of the TVB was taken to the east of Foxburrow Wood. We also believe that this would provide a better alignment for an eventual connection with a bypass for Little Glemham and Marlesford.

b) East Suffolk Council

- i. Like SCC, ESC acknowledges at para 1.196 that they would have preferred a FVB and this seems to echo the view that a FVB is recognised as being the best and most practical solution.
- ii. At para 2.130 ESC, in talking about the design states that it *“supports the Two Village Bypass and recognises the benefits of the new road for Stratford St Andrew and Farnham”*. But for the same reasons set out in 3 a) iv above, we believe that the design is flawed in that it will make the eventual delivery of a FVB highly problematic.
- iii. ESC at para 2.133 recognises *“the beneficial impact of the Two Village Bypass on Farnham and Stratford St Andrew – by taking the A12 out of these villages this enables restoration of the village setting in more tranquil surroundings”*. We have to ask why the same benefits are being denied Little Glemham and Marlesford?
- iv. The road resurfacing through Marlesford and Little Glemham as proposed by ESC in para 2.263 is essential, but it hardly addresses the fundamental traffic problems faced by the two villages.

4. Conclusions

We believe that the landscape and visual impact details for the Southern Park and Ride still lack detail. We note that significant issues are identified as “not for approval”, we are therefore concerned about how the process for approving such elements of the scheme and the conditioning of them will take place.

Marlesford and Little Glemham have had positive engagement with SCC Highways over A12 mitigation issues. The proposed mitigations are welcomed, but we don't yet know to what extent the Applicant has accepted the proposals. Whatever mitigations are eventually achieved, they will fall well short of the fundamental solution to the two villages' traffic issues which will only be solved for the long term by the provision of a Four Village Bypass.

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Cllr. Richard Cooper
Sizewell C Lead
Marlesford Parish Council

12th May 2021

Attached – Letter of Support from Suffolk's Police and Crime Commissioner