



## **Deadline 3 Submission**

**Comments on Responses to Examining Authority Written Questions**

**On behalf of Marlesford Parish Council**

**Regarding**

**NNB Generation Company (SZC) Limited**

**DCO Application**

**For Sizewell C Nuclear Power Station and Associated Works**

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**24<sup>th</sup> June 2021**

**Interested Party No.20025903**

**Marlesford Parish Council Comments on Responses to selected ExA Written Questions (Referenced using the ExA question numbers)**

(Please note that at certain points in this submission, reference is made to Little Glemham. In these instances, Marlesford Parish Council is representing views held jointly with Little Glemham).

ExA Written Question Reference	ExA Abbreviated Question	Marlesford Parish Council Comments on Responses to the Question from Various Sources
G.1.51	In light of the Applicant’s Change Proposals on the use of rail freight, the ExA asks the Applicant to set out what they consider to be a realistic time frame for the delivery and facilitation of both options in the event the DCO were to be granted. They ask Network Rail to comment on the Applicant’s proposals.	The Applicant provides a Gantt chart to explain the steps involved in being able to achieve their objectives for rail. Marlesford Parish Council (MPC) cannot comment on the adequacy or otherwise of this schedule, but it notes that Network Rail in its answer to this question states, “The Applicant has responded outlining the Network Rail Governance for Railway Investment Projects and the necessary processes for access to the Network. An indicative programme has been provided by the applicant which will form the basis of discussion between the parties.” This does not strike MPC as a wholehearted endorsement of the Applicant’s position and seems to leave it open as to how discussions might proceed and what rail capacity will eventually be available. We cannot conclude from this that the Applicant is going to be able to achieve its capacity aspirations for rail freight.
AQ.1.57	The ExA states that Campsea Ashe Parish Council [RR-0170] expresses concern that the assessment of effects from the Southern Park and Ride have not been adequately addressed and asks the Applicant to respond to the specific concerns.	The Applicant responds to the specific concerns of Campsea Ashe, but MPC questions whether the assessment effects for dust and emissions have been adequately assessed for receptors in Marlesford. This is a particular concern as the prevailing winds are in a generally west or southwest direction and will carry dust and emissions towards Marlesford if appropriate mitigation is not incorporated into the construction, operation and decommissioning plans. A contribution towards such mitigation would be the use of electric buses for the whole Park and Ride fleet.
AQ.1.67	The ExA asks whether it is fair on the part of the Applicant to refer to primary mitigation as ‘minimising’ freight movements on roads in light of the other	The Applicant, in its response states that “The work undertaken by the Applicant ensures that freight movements by road would be

	<p>delivery methods envisaged via rail and sea. They go on to ask if it is really fair to say these movements would be minimised when to date neither the rail nor sea alternatives are confirmed.</p>	<p>minimised.” MPC contends that this statement can only be true if other modes of freight movement (road and sea) have been maximised. Suffolk County Council (SCC) make clear in their response to this question [REP2-192], that they have “not seen evidence that, if the proposed increases in rail and sea deliveries are achievable and if they may have spare capacity, that they ‘minimise’ freight movements by road as much as reasonably possible, i.e. that the proportion of materials being brought to site using rail and sea-borne transport modes cannot be increased further beyond the 60% proposed by the Applicant.” This echoes MPC’s concerns expressed in para 11 of its Written Representation [Rep2-365]. And until such time as we know what the full details of the Applicant’s freight strategy are, we do not believe that it is possible at this stage for them to claim that they have minimised freight movements by road.</p>
AQ.1.76	<p>The ExA in this question query with SCC and ESC the engine standards that will be employed by the Applicant for HGV’s (and presumably buses) and plant equipment. The ExA notes “The revised Mitigation Route Map [AS 276] has added for the Main Development Site “Use of contractor vehicles as far as practicable that meet the Euro VI emissions standards and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority”. The ExA ask whether this wording is sufficiently robust.</p>	<p>Neither SCC nor East Suffolk Council (ESC) [REP2-176] regard the wording as being sufficiently robust. MPC agrees with this position and again asks that <u>all</u> HGVs delivering to the main construction site should be Euro V1 compliant (not just a proportion as SCC seems to accept) and all park and ride buses should be electric. Our view is that in the period between now and when construction starts, the Applicant has enough time to ensure that all its contractors comply with these requirements.</p>
AI.1.10	<p>The ExA asks why it is considered that an increased proportion of rail transport and sea-borne transport can be achieved without causing undue delay to the construction programme and whether the changes to the application have overcome SCCs concerns in this respect.</p>	<p>The Applicant appears confident that its plans for delivering 60% of materials by sea and rail (leaving circa 40% to be moved by road) can be achieved without compromising the project timetable. But uncertainties still exist, and MPC shares SCC’s concerns, expressed in its answer to this question, that the Applicant has yet to demonstrate conclusively that its plans can be achieved. And there is also a question of whether, if additional capacity above 60% were achievable by rail and sea, the Applicant would commit to using that capacity as a means of reducing the road borne freight percentage below 40%.</p>
AI.1.16	<p>At this question the ExA queries the route selection process for the Two Village Bypass.</p>	<p>In its response, the Applicant claims that an alternative route for the Two Village Bypass further to the east of Farnham (supported by</p>

		<p>Farnham and Stratford Parish Council and Farnham Environment Residents and Neighbours (FERN)) would increase journey times and reduce or negate the effectiveness of the road as a bypass. MPC contends that this is not a credible position – the additional distance involved could not be claimed to negate the bypass’s effectiveness. The Applicant goes on to say in relation to a more easterly alignment better facilitating a Four Village Bypass “The proposed alignment of the two village bypass in the DCO application would not prejudice the delivery of a longer, four village bypass in the future, but, based on the conclusions of previous studies (as discussed below), a more preferable solution may be for a separate bypass of Little Glemham and Marlesford to be brought forward in the future by Suffolk County Council (SCC) if deemed appropriate.” MPC disputes the fact that the proposed Two Village Bypass alignment would still allow the connection to a Four Village Bypass at a later stage and this view is supported at para 2.24 in SCC’s Deadline 2 Written Representation [Rep2-189] where SCC states “The Two Village Bypass will in effect preclude the building of the SEGWay four village bypass proposals on the desired alignment as set out in the SEGWay business case, and it does not deliver the full improvements required to address future congestion on the A12 to support the Lowestoft and east Suffolk economy, support the housing development in the Suffolk Coastal Local Plan and the other energy NSIP developments in the area.” MPC’s position remains as stated in para 7 of our Deadline 2 submission [Rep2-365], namely that the Applicant should be required to provide a Two Village Bypass alignment that is capable of joining to a bypass of Marlesford and Little Glemham, preferably as part of the Applicant’s works or at a later stage.</p>
<p>Al.1.17</p>	<p>At this question the ExA queries with the Applicant why the impact of Sizewell C traffic would not be sufficient to justify a bypass of all of Marlesford, Little Glemham, Stratford St Andrew and Farnham.</p>	<p>The Applicant justifies its position on a SCC report which states that “The most difficult section with the worst geometric layout is that between Stratford St Andrew and a point north of Farnham”. Whilst MPC recognises this as a fact, it should not be used to ignore the current difficulties faced by Marlesford and Little Glemham and whilst SCC states that there are “comparatively acceptable road widths and geometry” on the Marlesford and Little Glemham stretches of the A12,</p>

		<p>this does not automatically mean that the A12 through these two villages is acceptable for the volume of traffic proposed by the Applicant. We refer the ExA to comments made by Inspector Guy Rigby in the EA1-N and EA2 Issue Specific Hearing 13 (Traffic and Transport), when he recognised that Marlesford is “the first unimproved section of the A12 after the dual carriageway section [north of Wickham Market]”. MPC maintains its position that the only feasible, economic and sustainable solution is a bypass of all four villages. After all, Marlesford and Little Glemham will experience the same volumes of traffic that would have gone through Stratford St Andrew and Farnham.</p>
Al.1.25	<p>In this question relating to the choice of the proposed Southern Park and Ride site the ExA asks, “What assessment has been made of existing pressures on Wickham Market and the impact that the proposed park and ride facility would have on those pressures in comparison to a location beside the FMF?”</p>	<p>In its answer, the Applicant states that “SZC Co. has developed a package of measures for the B1078 between the A140 at Coddendam and Wickham Market that would mitigate impacts along this route. The measures and funding mechanism in the Draft Deed of Obligation (Doc Ref. 8.17(C)) are described in the Consolidated Transport Assessment (Doc Ref 8.5(B)).” MPC is not aware that any package of measures is fully developed for the B1078 and we await further detail from the Applicant. MPC welcomes the fact that any measures that are agreed will be funded through the s106 agreement.</p>
AR.1.25	<p>The ExA in this question asks the Applicant to explain the mitigation proposed to address the concerns of Marlesford and Little Glemham regarding adverse impacts of SZC traffic.</p>	<p>We welcome the fact that the Applicant is willing to contribute to the provision of traffic mitigation measures in the two villages (notwithstanding that MPC and Little Glemham Parish Council believe that the two villages should be bypassed). In their response to this question, the Applicant states “The proposed improvements include new 30mph speed limit through Marlesford and extension of the existing 40mph speed limit, traffic calming, gateway features, new and wider footways and crossings. The Applicant considers that these measures adequately mitigate any potential effects.” MPC is reserving its position on this matter until it has seen more detailed proposals. Specifically, it is concerned about the safety of pedestrians crossing the A12 in both villages and it also has concerns about junction and private access onto the A12 for vehicles turning right. We continue to work with SCC Highways and the Applicant to find a set of satisfactory</p>

		mitigation measures. We note that in its response to this question, SCC recognise the ongoing discussion, but are not yet satisfied that the measures proposed by the Applicant are adequate.
AR.1.27	In this question the ExA asks SCC and ESC whether they are satisfied with the provisions for people with protected characteristics who might be disadvantaged by the proposed development.	SCC particularly notes the need for improvements to pedestrian facilities which may reduce the impact on people with protected characteristics by reducing severance, improving access and reducing pedestrian fear and intimidation. MPC agrees with this stance and with the efforts that SCC are making to secure meaningful financial contributions from the Applicant to address adverse impacts.
Bio.1.13	In relation to the Southern Park and Ride, the ExA questions the Applicant's assertion that because effects on bats are individually not significant, they would not create significant inter-relationship effects. They ask "Cannot plural non-significant effects result in one or more significant inter-relationship (or in combination) effects?"	The Applicant argues that the correct methodology has been used to assess impacts on bats and that its primary and tertiary mitigation will result in effects on bat populations in the area of the Southern Park and Ride being "not significant". MPC cannot comment in detail on this assertion by the Applicant, but it feels that the scale of the development and the nature of the lighting would be expected to cause adverse impacts. MPC would have preferred to have seen this question addressed to Natural England as well as the Applicant and we would urge the ExA to seek their view prior to Deadline 4.
Cu.1.3	The ExA, looking at cumulative impacts with other projects (EA1N and EA2), recognises the impact of traffic using the A12 through Little Glemham and Marlesford and wants the Applicant to explain how the proposed mitigation would operate in practice and how this would satisfactorily overcome the anticipated cumulative moderate adverse effect on fear and intimidation.	The Applicant restates its comments from AR.1.25 above and MPC's position is as stated in its comments on that question. SCC, in their answer to this question considers that mitigation is required at this location in a "Sizewell C project only" scenario and therefore for all cumulative scenarios as well. SCC goes on to note that there is no commitment as to when (prior to peak) the mitigation works in Marlesford and Little Glemham would be carried out. MPC agrees with SCC when it says, "SCC considers that mitigation is required at this location in all scenarios and believe that mitigation should be delivered very early in the programme to avoid disruption on a haul route for both this Project and the EA1N and EA2 projects, and to minimise disruption on a strategic corridor." MPC also agrees with ESC on their comment against this question, "that any mitigation measures proposed such as additional crossing facilities, would need to be assessed from a noise and air quality perspective to ensure one adverse

		effect is not replaced by another.” This is an important consideration for both Marlesford and Little Glemham and begs the question that if adverse effects are likely to be created by mitigation measures, would the best answer not be to bypass both villages as envisaged by SCC’s SEGWay proposals?
HW.1.2	In this question the ExA addresses issues of community severance to the Applicant, SCC and ESC.	<p>In its response, the Applicant states, “The purpose of the Sizewell link road and two village bypass is to mitigate the environmental effects on local communities associated with the Sizewell C Project. Were these new roads not provided, the communities of Stratford St Andrew, Farnham, Yoxford, Middleton Moor and Theberton would experience an increase in traffic, resulting in adverse environmental effects, including adverse severance effects. With the new roads in place, general traffic and Sizewell C traffic will be diverted away from these communities and onto the new roads, which will result in beneficial environmental effects within the communities as a result of the lower traffic flows.”</p> <p>As neighbouring villages to Stratford St Andrew and Farnham and experiencing the same traffic flows as they would if not bypassed, the ExA will no doubt excuse us if we give this comment a less than lukewarm reception. Little Glemham and Marlesford will undoubtedly suffer significant community severance, and this will adversely affect people with protected characteristics (see AR.1.27). Despite the mitigation measures proposed by the Applicant for Marlesford and Little Glemham, community severance remains a real issue, as do our concerns for people with protected characteristics.</p>
LI.1.112	At this question, the ExA asks the Applicant “Marlesford Parish Council have requested the delivery of a long-term legacy of landscape improvements within/around the site of the SPR [AS-307] and have provided specifics relating to this. Please provide a response.”	The Applicant responds that, “Since the submission of the application, SZC Co. have engaged with Marlesford Parish Council and other interested parties to work together to reduce and/or avoid the impacts, where possible, associated with the construction, operation and removal and reinstatement of the of the southern park and ride at Wickham Market. SZC Co. has sought to reduce any impacts of the proposed development through a range of mitigation measures embedded through the Associated Development Design Principles (Doc

		Ref. 8.3(A)).” The last and only formal meeting that MPC and neighbouring villages held with the Applicant regarding LVI issues at the Southern Park and Ride was 8th October 2020. Apart from the extension (reinstatement) of the bund to the north west of the Park and Ride, we have seen no other substantive changes to the proposals. We await further detail on mitigation measures to address the concerns and legacy issues raised at the meeting last October.
LI.1.115	This question asks the Applicant to confirm what consideration has been given to the requests by Hacheston and Marlesford Parish Councils that dark skies around the two villages should be protected.	The Applicant states “SZC Co. have found no formal designation covering Hacheston or Marlesford Parishes that denotes it as a dark sky village.” The Applicant points out that Wickham Market is a source of light pollution at night and the Applicant goes on to explain its lighting strategy. MPC argues that simply because the skies around the village are not designated Dark Skies, there is no reason not to protect the darkness that we have and which is highly valued by residents. From the details given by the Applicant (and in the absence of expert interpretation), it is difficult for us to assess the proposals, but MPC remains concerned that with 6m lighting columns in the site and a bund of only 3m and given the fact that the Southern Park and Ride site is on a prominent hill, we find it difficult to accept that there will not be adverse impacts on our dark skies. We ask the ExA to continue to press the Applicant to provide the best measures in order to preserve the dark skies around Hacheston and Marlesford.
TT.1.34	In this question the ExA asks the Applicant about the possible need for structural alterations to the existing bridge on the A12 at Marlesford to facilitate the movement of abnormal load vehicles over this bridge.	The Applicant explains that for loads under 150t, all road structures on the A12 between the A14 at Seven Hills and the B1122 have all been approved by SCC. For loads in excess of 150t the applicant explains that they will either be brought in by sea or use the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell. They therefore conclude that “structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project”. It should be noted that in discussions with Scottish Power Renewables regarding their AIL requirements for EA1-N and EA2, there has been some debate about the future availability of the Belvedere Yard at Lowestoft. MPC therefore believes that the Applicant should have a contingency road plan should loads have to be brought in



		from the south. For completeness, Scottish Power have said that if Marlesford Bridge has to be used for AILs, they would lay down a temporary bridge deck.
TT.1.45	In relation to the Two Village Bypass and a potential Four Village Bypass, the ExA have asked the Applicant the following – “Policy Paragraph 3.4.33 states that the New Anglia Strategic Economic Plan (2014) details a key transport priority with regards to the Sizewell C development: “ <i>A bypass of Stratford St. Andrew, Farnham, Little Glenham and Marlesford is needed to keep HGV traffic off the A12 through these villages.</i> ” Explain in this context: (i) Why only two of these villages is proposed to be bypassed rather than the four; and (ii) What consideration has been given to the alignment of the Two Village Bypass with respect to the eventual alignment of a four village bypass envisaged in the Plan Response”	In answer, the Applicant states “An assessment based on guidance in the Design Manual for Roads and Bridges (DMRB) indicated that highway capacity would not be reached in Marlesford, Little Glemham and Stratford St Andrew but the narrowing of the A12 and tight configuration of the bend at Farnham would be likely to cause congestion during the peak construction period of the project.” MPC accepts that technically this may be the case, but we would point out that a Four Village Bypass has been deemed highly desirable, if not essential since the late 1980’s. A full history of the attempts to provide a Four Village Bypass appear in a letter to Baroness Vere (Parliamentary Under-Secretary of State in the Department for Transport) dated 30th June 2020 from Dr Daniel Poulter MP, which has been submitted with this representation. Of particular note is the fact that as recently as October 2018, Suffolk County Council made a bid for funding to Department for Transport (which was unsuccessful) but SEGWay (the Four Village Bypass) remains a strategic objective for SCC. The Applicant goes on to say “The proposed two village bypass would contribute significantly to a four village bypass, if one was developed in the future, by providing the A12/A1094 roundabout at Friday Street, which has been a constant in all of the previous studies by SCC, and the bypass of two of the villages on a similar alignment to that previously preferred by SCC. In theory, the two village bypass could have a spur coming off of it to the south to facilitate a four village bypass, which would continue to bypass Little Glemham and Marlesford.” This is at odds with the view expressed by SCC at para 2.24 in their Deadline 2 Written Representation [Rep2-189] and referred to above under A1.1.16. MPC and Great Glemham Parish Council remain of the opinion that the two villages should not be forced to wait until traffic becomes intolerable on the A12 before a bypass is delivered. And under the Applicant’s current proposals and according to SCC, it appears that the alignment of the Two Village Bypass will preclude the provision of a bypass for Marlesford and Little Glemham – we have to assume, for at

		<p>least a generation. This is a missed opportunity to provide a cost-effective solution – any later provision of a bypass for Marlesford and Little Glemham will come at a high price because it will not be an integrated project.</p>
<p>TT.1.87</p>	<p>The ExA at this question asks the Applicant “Numerous Relevant Representations have raised concerns around rat running through less suitable routes by workers and traffic associated with Sizewell C. Explain measures that are proposed or that could be employed to ensure compliance with recommended routes including any signing and digital navigation services proposed.”</p>	<p>This is a hugely important issue for the villages around the Southern Park and Ride and the inevitability of “rat running” is acknowledged by SCC in their answer to the question when they state, “Thus, SCC considers that it is likely that many workers and local drivers will switch to minor routes ‘rat running’ through local communities.”</p> <p>MPC considers that there needs to be more commitment from both the Applicant and SCC towards finding solutions to addressing this problem which is likely to make life extremely difficult for residents local to the Southern Park and Ride. The issue should not be put into the “too difficult to resolve” box. We would expect to continue discussions with the Applicant and SCC in order to solve the problem.</p> <p>MPC welcomes the fact that all goods vehicles over 3.5 tonnes (larger LGV and all HGVs) and all Sizewell C buses will be on fixed routes to/from the main development site and that the Applicant will monitor the HGV routes using GPS technology, as secured in the Construction Traffic Management Plan.</p> <p>We are less convinced about the control of LGVs arriving and leaving the Southern Park and Ride. The Applicant states that LGVs visiting the main site will be booked into the Delivery Management System and will presumably therefore be controlled in terms of routes. It is not clear that suitable controls will be in place for LGVs visiting the Postal Consolidation Facility at the Southern Park and Ride. We believe that the technology exists to be able to control these movements and anything that can be done by the Applicant to keep LGVs off minor roads (particularly the B1078 to the west of Wickham Market) <u>should</u> be done.</p>

		We welcome the Applicant's Road Signage Strategy, but believe it needs to be further refined and we are happy to work with the Applicant to develop the strategy. A continual monitoring of the effectiveness of the Signage Strategy should be maintained once construction starts and effectiveness should be a standing item on the Transport Review Group's agenda.
TT.1.99	In relation to traffic in Marlesford and Little Glemham, the ExA asks the Applicant "In the case of Little Glemham and Marlesford how will the traffic increases be mitigated throughout the construction programme?"	The Applicant repeats the mitigation measures that have been discussed with Marlesford and Little Glemham (see AR.1.25 above) – our comments are included above. We would however ask that works to the A12 in Marlesford and Little Glemham be carried out early in the construction programme. This would provide the maximum potential benefit to the two villages and is likely to cause less congestion on the A12 than mitigation works that might be carried out closer to Peak.
TT.1.104	The ExA asks the Applicant to explain why the existing layout on A12 northbound carriageway would be changed from two lanes to one lane before the northbound slip road from the B1078 joins the A12?	The answer given by the Applicant is accepted by MPC. We would point out however that by reducing from two lanes to one to allow traffic on the northbound slip-road to join the A12, there will be inevitable delays as northbound traffic on the A12 merges before the slip road joins. We believe that this will add to the congestion as traffic enters Marlesford from the south and we do not believe that its effects have been fully appreciated by either SCC or the Applicant. It is a further reason why a Four Village Bypass delivered now would be the most appropriate solution.
TT.1.126	At this question the ExA notes that an increased and significant effect on fear and intimidation has been identified at Link 26 A12 Marlesford, and asks if the Applicant is proposing any mitigation.	The Applicant confirms that mitigation is proposed for Marlesford and Little Glemham (see AR.1.25 above). We will continue to engage with the Applicant and would repeat the MPC comments made in TT.1.99 above.
SA.1.59	At this question the ExA <i>inter alia</i> , queries the mechanisms under which the Transport Review Group would operate. The ExA also notes that the Applicant will have "considerable discretion over the schemes to be implemented" in	In particular, MPC is concerned about resolving any tied vote in the Transport Review Group (which it would expect Suffolk County Council to chair). If tied matters are to be referred upwards for resolution, this potentially pushes decision making (which affects local communities),

	<p>Marlesford and Little Glemham. It asks the Applicant to explain its position on this.</p>	<p>further from the grass roots. MPC asks that this be avoided and expresses its preference for tied matters in the Transport Review Group to be determined by the Chairman’s casting vote. We agree with SCC’s response to this question.</p> <p>We share the concern of the ExA that at this stage, the Applicant has considerable discretion over how the Marlesford and Little Glemham mitigation scheme is implemented. We note that the Applicant relies on the fact that “The scope of these schemes will be specified in the Deed of Obligation” and we would expect to be able to review the draft Deed before it is formally adopted. We will be pushing for this in our ongoing discussions with the Applicant and SCC.</p>

**Richard Cooper**  
**On Behalf of Marlesford Parish Council**  
**24<sup>th</sup> June 2021**