



Deadline 6 Submission

Written Representation Regarding Written Representations Received at Deadline 5

On behalf of Marlesford Parish Council

Regarding NNB Generation Company (SZC) Limited DCO Application

**Richard Cooper
Councillor
Marlesford Parish Council**

**Melanie Thurston
Parish Clerk**



Interested Party No.20025903

6th August 2021

Comments on Written Representations submitted at Deadline 5

| | Comment from | Issue | Marlesford Comments | Reference |
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| 1. | ESC | <p>Benefits of the Two Village Bypass: The permanent, long term noise, and wider environmental, benefits of the two-village bypass and the Sizewell link road for the residents of Farnham, Stratford St Andrew, Middleton Moor and Theberton are material and should not be overlooked. The two roads will provide a long-lasting benefit to the residents of these villages by reducing the traffic noise on the A12 at these key locations. ESC welcome the Two Village Bypass and Sizewell Link Road and the associated reductions in traffic noise in the bypasses villages. However, this does not detract from the need to minimise and mitigate noise impacts on the receptors which would be adversely affected by noise from the new roads. ESC has requested further information from the Applicant on this matter</p> | <p>Marlesford Parish Council (MPC) note the comments by East Suffolk Council (ESC) on the benefits of the Two Village Bypass, particularly in relation to the positive reduction in noise impacts on Farnham and Stratford St Andrew, but we believe that the position of Marlesford and Little Glemham has largely been ignored. If these two villages remain un-bypassed, then our residents living adjacent to the A12 will suffer the full noise impact of the increase in traffic as a result of the Applicant’s proposals for Sizewell C (SZC). We are also concerned about the adverse impact of increases in traffic (particularly HGVs) on air quality (AQ) and vibration. We have previously called for comprehensive baseline studies of noise, AQ and vibration (most recently in [REP5-237 and REP5-238]) in order that the current situation can be accurately recorded prior to the commencement of the SZC build. Regular monitoring of noise, AQ and vibration should then take place for the duration of the SZC build. As a <u>minimum</u> mitigation we would expect to see the Applicant fund the double glazing of all front elevations of properties facing the A12 in Marlesford and Little Glemham.</p> | <p>[REP5-138] East Suffolk Council comments on Deadline 3 and 4 submissions from the Applicant. Table 18.1 Pg 162 Section Ref 20f</p> |
| 2. | ESC | <p>Two Village Bypass – implications for possible Four Village Bypass ESC defers to SCC to provide the detail on acceptability of a Two Village Bypass. ESC has previously supported SCC in its earlier aspirations and proposals to achieve a Four Village Bypass. ESC supports the chosen route of the Two Village Bypass. SCC is responsible for assessing implications arising from road noise.</p> | <p>MPC notes that in its comments, ESC have previously been supportive of a Four Village Bypass, but now accept the route of the Two Village Bypass. We regret ESC’s stance on this as it consigns Marlesford and Little Glemham to living with the A12 as it is, with its current issues of community severance and fear and intimidation. We believe that a more robust approach to central government by both local authorities is required in order to make the case (even at this late stage) for a full Four Village Bypass.</p> | <p>[REP5-140] ESC Written summary of oral case ISH 2 Traffic and Transport, 7 July 2021 Agenda Item 3. Transport Strategy relating to Associated</p> |

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| | | | | Development Sites Pg 4 |
| 3. | ESC | <p>North and South Park and Ride sites – size and modelling coverage.</p> <p>The percentage of Electric Vehicle Charging points provided at the park and ride sites in the application is 5% + 5% passive provision. ESC (and SCC) consider that this is too low and should be closer to 20% + 25% as per SCC Parking standards. This is under discussion with the Applicant. (4.7.15 Construction Worker Travel Plan [REP2-055]).</p> <p>ESC is encouraging the Applicant to commit to using ultra-low emission buses or electric buses to reduce the impact on local air quality and to promote the use of sustainable transport on all park and ride and bus routes during the construction phase.</p> | <p>MPC welcomes ESC’s robust stance on the issue of electric charging points at the proposed Southern Park and Ride site. We would go further than ESC and insist that the Applicant uses an “all electric” bus fleet at both the Northern and Southern Park and Rides. This would assist in reducing adverse impacts on AQ and noise.</p> | <p>[REP5-140] ESC Written summary of oral case ISH 2 Traffic and Transport, 7 July 2021 Agenda Item 3. Transport Strategy relating to Associated Development Sites Pg 5</p> |
| 4. | ESC | <p>Park and Ride sites traffic modelling</p> <p>ESC are satisfied with the locations chosen for the southern and northern park and ride. Subject to the right detail under the discharge of requirements with regards to landscaping, lighting, design, we have no specific concerns. (5.4, 15.87, 15.90, LIR [REP1-045]).</p> | <p>MPC disagree with ESC in their support for the chosen location of the Southern Park and Ride. Although this response is in the traffic modelling session of the ISH, their comments opposite stray into observations on landscaping, lighting and design. Unlike ESC we are not satisfied that “Subject to the right detail under the discharge of requirements.....” is the correct way to deal with such important issues when they will have a very significant impact on the communities around the Southern Park and Ride site. Before the end of the Examination we and our neighbouring parishes would expect to see more detail on all the issues which currently fall under the heading of “not for Approval”.</p> <p>MPC (as stated in [RR-0758] and subsequent submissions) remains opposed to the siting of the Southern Park and Ride on one of the highest pieces of land in the area and between the valleys of the Rivers Ore and Deben which have previously been designated as Special Landscape Areas.</p> | <p>[REP5-140] ESC Written summary of oral case ISH 2 Traffic and Transport, 7 July 2021 Agenda Item 3. Transport Strategy relating to Associated Development Sites Pg 6</p> |

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| 5. | ESC | <p>Consideration of local transport impacts.</p> <p>Proposed local work in Little Glemham – ESC wish to see air quality monitoring carried out for a minimum of six months before and 12 months during operation of the pedestrian crossing to ensure air quality is not significantly negatively affected in view of the baseline traffic volumes on the A12 at this point, additional traffic resulting from the proposed development, and proximity to Stratford St Andrew AQMA. (Ongoing meetings with Marlesford / Lt Glemham). Ongoing discussion is taking place with the Applicant regarding a review process for the crossing in the event of air quality being adversely affected.</p> | <p>MPC welcomes ESC’s desire to see AQ monitoring carried out in Little Glemham, but argues that the same approach as that proposed for Little Glemham should be extended to Marlesford in order to provide baseline data <u>and</u> ongoing AQ monitoring during the SZC construction period.</p> | <p>[REP5-141] Written summary of oral case ISH 3 Traffic and Transport, 8 July 2021</p> <p>Agenda Item 4. Consideration of local transport impacts Pg 4</p> |
| 6. | | <p>Requirement 22A</p> <p>Requirement 22A relates to landscaping works at the Associated Development sites. However, the wording of the requirement currently refers only to the submission and approval of ecological management plans rather than landscape and ecological management plans. If the intention is for this requirement to cover landscaping, then it will require re-drafting to reflect this, with reference to an oLEMP or LEMP</p> <p>Furthermore, requirement 22A currently only includes the Two Village Bypass (Work No. 11) and the Sizewell Link Road (Work no. 12). It should also include the northern and southern park and ride facilities and the freight management facility.</p> | <p>MPC supports the contention of ESC that the Southern Park and Ride should be included within the scope of Requirement 22A.</p> | <p>[REP5-143] Written summary of oral case ISH 5 Landscape and Visual Impact and Design, 13 July 2021</p> <p>Agenda item 10. Mitigation and controls Draft DCO Requirement 22A Pg18</p> |
| 7. | SCC | <p>Transport Review Group</p> <p>SCC remains of the view that as highway authority, it would be appropriate for SCC to have the casting vote as Chair of the Transport Review Group.</p> | <p>MPC supports SCC’s view on the issue of casting votes. We are keen to ensure that the local Highways Authority has the power to determine decisions on highways issues in the event of split votes in the Transport Review Group.</p> | <p>[REP5-172] [REP3-044] THE APPLICANT’S</p> |

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| | | | | COMMENTS ON COUNCILS' LOCAL IMPACT REPORT. Pg108 |
| 8. | SCC | <p>Potential for increased surface water flood risk at several sites.</p> <p>The Applicant has said "No new data will be available during the examination for the park and ride sites, freight management facility and green rail route. On the basis of existing data, SZC Co. is confident that SuDS-led design strategies can be delivered within the Order Limits for these sites."</p> <p>SCC has responded: Whilst productive discussions on Sizewell Link Road, Two Village Bypass and Yoxford Roundabout have taken place, the level of information shared with SCC to date, short of results of infiltration testing, is limited. No comprehensive outline surface water drainage strategy has been presented with supporting calculations, plans and sections, for either of these three schemes. Section highlighted yellow – To confirm, is the Applicant stating they do not intend to provide any further information, to supplement that contained within the Outline Drainage Strategy, for any of the listed sites? If this is the case, SCC have serious concerns regarding this approach. If this is not the case, SCC would welcome the Applicant clarifying what this statement relates to.</p> | <p>We support SCC's position on the supply of detail relating to surface water drainage at the Southern Park and Ride. We believe the Applicant is relying on a SUDs strategy and we have long had concerns that insufficient detail has been supplied on whether such an approach is feasible and workable.</p> <p>We would ask the Applicant to produce better detail on their drainage strategy for the Southern Park and Ride – particularly as it is sited in an elevated position a short distance from and above the A12 northbound carriageway.</p> | [REP5-172] [REP3-044] THE APPLICANT'S COMMENTS ON COUNCILS' LOCAL IMPACT REPORT. Table 20.1 Ref 22c Pg 35 |
| 9. | SCC | <p>Comments on Two Village and Four Village Bypass</p> <p>Our Written Representation [REP3-042], (as are other SCC submissions) is clear that SCC welcomes the two village bypass, as an appropriate mitigation for Sizewell C; the missed</p> | <p>We reluctantly agree with SCC that it is probably not proportional for the Applicant to fund a full Four Village Bypass. However, we have severe regrets that the involvement of the Applicant in funding the proposed Two Village Bypass has not led to SCC and central government being able to</p> | [REP5-172] [REP3-042] THE APPLICANT'S COMMENTS |

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| | | <p>opportunities relate in this instance to the rejection of Government of the preferable four village bypass proposal, rather than the Applicant’s specific proposals for the two village bypass scheme.</p> <p>As paragraph 1.4 in SCC’s Written Representation states: “Whilst SCC sees the Two Village Bypass as essential minimum mitigation for the Sizewell C development that also has legacy benefit and considers that it is not proportionate for the Applicant to fund a longer bypass than the proposed Two Village Bypass, we consider it unfortunate that an opportunity to develop a full four village bypass (known as the “Suffolk Energy Gateway”) could not be realised, as funding from the Department for Transport could not be secured.” And in 2.25, the two village bypass is referred to as “an important improvement to the current road provision, with legacy benefit for Suffolk.”</p> <p>SCC accepts that it is in principle possible to bypass the other two villages in the further (albeit not on the desired alignment as set out in the SEGWay business case), although it is noted that the business case for such a scheme will be less advantageous for the remaining two villages on their own.</p> | <p>leverage the Applicant’s contribution in order to deliver the full Four Village Bypass.</p> <p>It is particularly important to note SCC’s comments in its final paragraph opposite where it states that “the business case for such a scheme [bypassing Marlesford and Little Glemham] will be less advantageous for the remaining two villages on their own”. We regard this as an understatement. Not only do we believe that in all practical terms, the future linking of the Two Village Bypass to a bypass of Marlesford and Little Glemham will be impossible, but we also believe that the cost of delivering it will be so great (by comparison to its cost if incorporated in a full Four Village Bypass) that the business case would not stand up, whereas, delivered now, as a comprehensive solution for all four villages, we believe the benefit cost analysis would be significantly positive.</p> <p>In their [REP5-173], SCC state that “SCC will continue to seek support to bypass the remaining two villages (Marlesford and Little Glemham) as the four village bypass remains as a key transport issue in our Local Transport Plan (LTP1) but recognises that it is likely to be more difficult to get funding following delivery of a Two-Village Bypass.”</p> <p>MPC welcomes this stance, but we must impress on all parties involved, the urgency to find a comprehensive solution to the Four Village Bypass issue.</p> | <p>ON WRITTEN REPRESENTATIONS Pg 56</p> |
| 10. | SCC | <p>Cycle Connectivity Fund</p> <p>No details regarding the cycle connectivity fund are provided in the draft Deed of Obligation [REP3-027]. SCC has proposed a number of schemes that may have been included in the cycling connectivity fund including</p> <ul style="list-style-type: none"> • Leiston Walking and Cycling Scheme • B1122 Repurposing Scheme <p>Although discussions have been held regarding the possible scope of the cycle improvements to the southern park and ride.</p> | <p>MPC has been arguing for the delivery of an improved pedestrian and cycleway on the northern side of the A12 between Marlesford and the Fiveways Roundabout. This would form an important mitigation measure for pedestrians and cyclists traveling between Marlesford and Wickham Market. From the Applicant’s point of view, delivery of such a facility would provide a legacy benefit to local communities. We urge SCC and the Applicant to work together to ensure that such a scheme comes within the scope of the Cycle Connectivity Fund.</p> | <p>[REP5-172] [REP3-042] THE APPLICANT’S COMMENTS ON WRITTEN REPRESENTATIONS Table 7. SCC’s response to comments from Chapter 16 –</p> |

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| | | | | Transport Impacts at Associated Development Sites 18g Pg 28 |
| 11. | SCC | <p>Design considerations, including night-time lighting effects.</p> <p>SCC comment - Following discussions between the community and the applicant and modifications to the detailed scheme SCC is satisfied that this outline proposal can be controlled by the Discharging Authority</p> | <p>MPC do not share SCC's optimism that the outline proposal can be controlled by the Discharging Authority and we refer the ExA to our comments under 4. above.</p> <p>We also take this opportunity to remind the ExA that the LVIA issues relating to the Southern Park and Ride were not covered in ISH 5 Landscape and Visual Impact and Design and the undertaking from the ExA was that another opportunity would be provided for Interested Parties to make their views known to the ExA. We urge the ExA to come forward with a date for this particular ISH issue at the earliest opportunity.</p> | <p>[REP-176] Issue Specific Hearing 5 (13 July 2021) – (ISH5) Landscape and Visual Impact and Design Agenda Item 8 Southern Park and Ride Pg 16</p> |
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Cllr. Richard Cooper
Marlesford Parish Council

6th August 2021

