



Deadline 10 Submission
Final Written Representation
On behalf of Marlesford Parish Council
Regarding NNB Generation Company (SZC) Limited DCO Application

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Interested Party No.20025903

4th October 2021

Marlesford PC Final Written Representation

1.	<p>Introduction</p> <p>Marlesford Parish Council (MPC) is grateful to the Planning Inspectorate for the time and attention that it has committed to examining the NNB Generation Company (SZC) Limited DCO Application for the proposed Sizewell C nuclear power stations. We remain concerned on many of the aspects of the development that will affect the residents of Marlesford and its surrounding villages and we want to take this opportunity to remind the ExA of our key concerns and ask that in its final recommendation to the Secretary of State, it takes cognizance of the arguments that we have consistently put forward. So far as it is able, we ask that the ExA puts obligations on the Applicant not only to mitigate the impacts that arise as a result of its development, but also to provide for legacy benefits to be created by the Applicant, particularly in relation to A12 mitigation and to landscaping. We list below our main concerns and provide references to previous submissions, the list is not exhaustive and we hope that the ExA will have picked up on all of our concerns voiced in earlier submissions.</p>	
	Issue	Comments
2.	<p>Two Village Bypass</p>	<ul style="list-style-type: none"> We detailed our concerns about the Two Village Bypass (TVB) in Deadlines 2 & 3 [REP2-365] and [REP3-111]. These concerns remain. We are appalled by the fact that no provision has been made in the Applicant’s design of the TVB for the future bypassing of Marlesford and Little Glemham. We recognise that a Four Village Bypass (FVB) may not be seen as being proportional for the Applicant to provide, but we are frankly amazed that Suffolk County Council (SCC) has not taken the opportunity to more diligently seek ways of delivering a FVB solution, or at least allowing for its later provision. This must be seen against the background of SCC maintaining the FVB as a strategic objective and the fact that a FVB was seen as being necessary and was approved in 1995 (but subsequently abandoned due to lack of funding). Given the current alignment of the TVB it seems highly unlikely that Marlesford and Little Glemham will be bypassed within the next 25 years – this is a massive missed opportunityunless the ExA can exert pressure on the Applicant and SCC to reconsider the alignment of the TVB in order to later facilitate the delivery of the FVB. <p>On this basis, it could be more than 50 years from when a bypass of Marlesford and Little Glemham was first approved to the point when it might be delivered, during which time</p>

		the problems faced by Marlesford and Little Glemham have become and will continue to be intolerable.	
3.	Southern Park and Ride	<ul style="list-style-type: none"> • MPC maintains that the proposed location for the Southern Park and Ride (SP&R) is an inappropriate one. It is in a prominent location on high ground between the two river valleys of the Ore and Deben (both formerly designated as Special Landscape Areas). And without appropriate controls, a proportion of the traffic using the SP&R will travel through Wickham Market, a village which currently struggles to cope with the existing volume of traffic and will suffer even more if the SP&R becomes operational in the proposed location. It is worth noting that Wickham Market was bypassed in the mid-1970s, because even at that time, traffic was having a heavy adverse impact on the village. The Applicant's proposals for mitigation may well slow traffic down and make it safer for pedestrians, but the delays caused for local residents will be unacceptable. We call on the ExA to ensure that the Applicant is required to adopt a robust signage approach that requires traffic to use the A14/A12 rather than the inappropriate B1078. • MPC and the other villages surrounding the SP&R are requesting a meeting with the Applicant to try to resolve outstanding concerns over landscaping issues at the SP&R. We await a date for that meeting. We are however anxious that more is done to enhance landscaping around the SP&R and wherever possible to leave a legacy benefit through sympathetic and appropriate planting and we will expect to see more detail from the Applicant than has so far been forthcoming. • In the MPC Deadline 8 Submission [REP8-240] we stated that MPC, Campsea Ashe, Hacheston and Wickham Market Parish Councils all have concerns about the determination of the Applicant's proposals for, drainage, lighting, signage and buildings which are all marked as "Not for Approval" in the Applicant's DCO, Book 2, 2.7, Plans Not For Approval. All four of these matters are of considerable concern to the four villages. We understand that the detailed application will be determined and conditioned by East Suffolk Council (ESC) as the local planning authority. In ISH 13 counsel for the Applicant inferred that ESC may or may not consult with local parishes on the matters it is determining. The four parishes have subsequently sought an assurance from ESC (copy submitted to ExA at Deadline 8) that we will all be fully and properly consulted on the Applicant's detailed plans. We want the ExA to ensure that ESC is under an obligation to fully and properly consult on these matters and to action them through appropriate conditions. 	

		<ul style="list-style-type: none"> • We continue to maintain that two visual receptors have been omitted from the SP&R LVIA (see [REP5-237]). These are Marlesford Hall (OS map ref 323 586) and Public Footpath Marlesford (OS map ref 321 585). We believe these viewpoints should have been included and would ask the ExA to require the Applicant to carry out the appropriate work to include them. • We still argue (as we did at [REP7-209]) that two noise receptors that will be affected by the SP&R have been omitted. They are Ford Gatehouse (IP13 0AS) and Marlesford Hall (IP13 0AU). • We have already voiced our concerns regarding lighting of the SP&R (Deadline 5 [REP5-237]) and we expect the Applicant to work with us to ensure that light spill and diffusion into the night sky are minimised so as to cause least impact to our relatively dark skies. 		
4.	The provision of a pedestrian and cycleway from Marlesford to the SP&R	<ul style="list-style-type: none"> • MPC had understood that SCC had a priority of providing a pedestrian and cycleway from Marlesford to the SP&R. We are therefore hugely disappointed that it has not been provided for in the Deed of Obligation (DoO). The current pedestrian path is almost unusable and cyclists using the A12 suffer unreasonable fear and intimidation. We are told by the Applicant and SCC that they can make no commitment to delivering this enhancement and that it may be considered disproportionate and that some land required for the infrastructure may be outside Highways' ownership. We argue that these constraints should be overcome and in the absence of a bypass of Marlesford, a pedestrian and cycle path is a very small "ask". We are disappointed that we do not have the comfort of this project being enshrined within the DoO, although the Applicant has undertaken to look at alternative sources of funding (presumably Cycle Connectivity Fund) and we would welcome the ExA requiring the Applicant to use its best endeavours to deliver the pedestrian and cycleway – as it is committing to do for Wickham Market. 		
5.	A12 mitigation proposals through Marlesford and Little Glemham	<ul style="list-style-type: none"> • MPC and Little Glemham welcome the mitigation measures already agreed with the Applicant and referred to in our joint Deadline 7 Submission [REP-207]. Subsequent to the submission, we have had a meeting with the Applicant and the dialogue continues. Several issues remain outstanding: <ul style="list-style-type: none"> ○ We believe more should be done in the two villages to improve safety for vehicles making right turns onto the A12. We have requested several junction improvements but have so far had no substantive commitments. 		

		<ul style="list-style-type: none"> ○ We are insistent that the Applicant supplies baseline data for the two villages for noise, air quality and vibration prior to main site construction in order to inform assessment of the impacts of additional traffic on properties close to the A12 in the two villages. The Applicant has agreed to see what data is available and supply it in a form which can be reviewed by the two Parish Councils. We would appreciate the ExA requiring the Applicant to do this. We believe this is a proportional request and does not involve the Applicant in significant expenditure prior to the start of construction. ○ We recognise that there will be a Contingent Effects Fund, the purpose of which will be to fund retrospective mitigation issues not picked up in the Examination. We urge the ExA to ensure that proper mechanisms are in place to ensure that local concerns can be escalated up to the Transport Review Group. 	
6.	Conclusion	<p>We are bitterly disappointed that the Applicant hasn't been more responsive and aware of community concerns throughout the consultation process. Some aspects of its stance have been disingenuous, and we are concerned that as the Examination draws to a close, major question marks remain against such important issues as funding, coastal defences and the construction material transport strategy. MPC remains deeply frustrated by the fact that a once in a generation opportunity to deliver the long awaited Four Village Bypass is (at the moment) going to be missed.</p> <p>We conclude that the ExA should recommend to the Secretary of State that the SZC DCO application be refused on the grounds that there are too many uncertainties surrounding it. If the proposals are approved, the East Suffolk community is going to pay an incredibly high price on behalf of the whole country and we believe that Applicant has failed to satisfy many in the community that it can adequately mitigate the worst impacts.</p>	

Cllr. Richard Cooper
Marlesford Parish Council

4th October 2021

