

WICKHAM MARKET PARISH COUNCIL



Chairman: Cllr Richard Jenkinson

Parish Clerk: Joanne Jones, [REDACTED]

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To: Ms G Boyle
EIA and Land Rights Advisor, PINS
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref: EN010012-000670

Our Ref: WMPC-SZC Letter to PINS re: EDF DCO Submission

Sent by post and email: sizewellc@planninginspectorate.gov.uk

14th April 2020

Dear Madam,

Wickham Market Parish Council Sizewell C **EDF DCO Submission timetable**

We are writing to express serious concerns over the possible submission by EDF of their DCO towards the end of April 2020.

EDF announced recently that owing to the Covid 19 situation there would be delay of a mere three weeks from their earlier proposed submission at the end of March.

Given the current situation which all Parishes find themselves we find the contents of the letter unrealistic. Working at home, closure of public buildings that prevents lack of access to paper documentation, public meetings and normal protocols suspended and prevention of site visits deemed as not essential travel creates a very different and almost impossible environment in which to work.

Like all Parishes our Parish Council are unable to meet in person at the present time, unable to liaise with our community effectively and therefore our ability to respond to a NSIP DCO submission will be significantly compromised as a result. The possibility of effective public engagement in the planning process for a project that has significant environmental and social impacts across the County and region is impossible at the current time. There is also the problem that many individuals are now having to support the community and their families in welfare matters and will struggle to provide the time resource needed to carefully consider a DCO submission.

The Parish Council would also like to register its concern over the consultation process employed by EDF to date. The process employed has not followed the 'front-loaded' consultation process for

National Infrastructure Projects that is advised.

We have repeatedly expressed our concerns at EDF's lack of detail in consultation. Our concerns are focussed on the traffic impacts on the parish due to the proposed location for the southern park and ride and the environmental impacts of the car park itself. The WMPC responses at each stage of the consultation have barely been taken into consideration our concerns in terms of the design and mitigation provided.

In the Department of communities and Local Government: 'Planning Act 2008: Guidance on the Pre-application Process' it says:

'The front-loaded emphasis of consultation in the major infrastructure planning regime is designed to ensure a more transparent and efficient examination process. (6.)'

Like many other bodies our experience would indicate that EDF have not followed this advice.

We have raised our concerns before as below:

Stage 3 Consultation The final comment in our response:

"We share the concerns of many other parties that EDF are undergoing what may be the final round of consultation before submission of the Development Consent Order to the Planning Inspectorate. There seem to be so many issues that would benefit from a further round of consultation. We urge EDF to provide significantly more detail and solutions to the issues raised by our WMPC and many other parties and enter into a fourth stage of project consultation prior to the final DCO submission"

Stage 4 Consultation We welcomed the Stage 4 consultation but found it that it addressed only limited issues, the final comment in our response:

"We share the concerns of many other parties that EDF have failed to address serious matters raised by WMPC through previous consultations. Before submission of the Development Consent Order to the Planning Inspectorate, we urge EDF to address these concerns."

In the **Stage 4** Consultation Document EDF stated:

"we are now also considering an alternative approach of working with the Parish Council to bring forward a public realm improvement scheme within the public highway which would represent the first phase of implementation of the Neighbourhood Plan. This would consider footpath and pedestrian crossing provision as well as the best location of on-street parking to meet demand and minimise delay to through traffic. The scheme would provide a legacy benefit to Wickham Market."

At the time of Stage 4 Consultation **no discussions** had taken place between EDF and the Parish Council or the Neighbourhood Plan Committee. On 17 September 2019 the Parish Council wrote to EDF highlighting and objecting to the misleading nature of this statement. EDF accepted that they had not approached the Parish Council but wished to liaise with them in future.

Since then we have managed to arrange two meetings with EDF; 9 December 2019 and 9 March 2020. On both occasions EDF have been unwilling to share any information concerning their ideas on mitigation or traffic modelling for the village. Indeed at the 9th March meeting they said that information would be shared as part of the DCO process but not before. Therefore this would be outside the formal consultation process which we regard as contrary to the advice regarding the consultation being front-loaded.

Wickham Market Parish Council through its Traffic and Parking Working Group (TPWG) has access to facilities to measure traffic volumes and speed; the measurements taken of actual traffic volumes leaves us to question EDF's traffic modelling. These concerns have been made clear in our

responses to Stage 3 and Stage 4 consultations. If EDF do not make details of their traffic modelling available we have no means to verify their veracity. Without the ability to have a better understanding of the traffic model and assumptions used we cannot agree that the consultation process is complete and EDF's application is ready for DCO inspection.

So far the approach of EDF to mitigation of traffic impact on Wickham Market has been concerned with attempting to consider improved traffic flow but little consideration for mitigation of impacts arising from the volume of traffic on the residents.

EDF have provided estimates of the increase in daily vehicle journeys through Wickham Market, we assume this is purely down to traffic travelling to the southern park and ride site, though it is possible that additional traffic will use the B1078 to avoid congestion on the A12. If EDF were committed to a transparent approach to consultation they would share more information on their assumptions and details of the traffic model used.

We believe the examples given in this letter highlight the fact that EDF have not conformed to the expected process for consultation. This combined with the significant challenges arising out the current Covid 19 situation lead us to conclude that a DCO submission in April is both impractical and unacceptable.

Yours faithfully



R J Jenkinson
Chairman
Wickham Market Parish Council



Cc Sizewell C Team SCC/ESDC Email: sizewellc@eastsoffolk.gov.uk