

Submission for Deadline 5

Written Summary of Oral Case (ISH4) - Onshore Environment, Construction, Transport and Operational Effects Wednesday 20th January 2021

Submitted by Richard Cooper (Lead for Marlesford Parish Council on Infrastructure Projects)

1. Introduction

Marlesford is a small village which straddles the A12 just north of the northern end of the Wickham Market bypass. The village lies 7½ miles to the west of Friston. Marlesford will be adversely impacted if the SPR two substation scheme goes ahead. The village already suffers from community severance and I argue that it will be made worse by the cumulative impact of traffic associated with the SPR and Sizewell C (SZC) projects. In addition, there is a grave concern about Scottish Power Renewables plans for Abnormal Indivisible Loads (AILs).

2. Summary

- i. There is a marked lack of detail in the DCO on the plans for transporting AILs to the Friston site.
- ii. The SPR I 18-952 East Anglia TWO & ONE North Offshore Windfarm I AIL Report I 19.10.18 prepared by Wynns makes clear that:
 - Highways England (HE) preferred route is from a marine shipment to Belvedere Yard, Lowestoft and thence via the A12 through Leiston to Friston
 - Felixstowe is not a preferred port of entry as far as HE is concerned.
 - There appears to be no settled solution for the delivery of AILs.
- iii. The DCO at various points refers to potential bridge strengthening requirements to the River Ore bridge on the A12 at Marlesford in order to accommodate AILs, but no detail is given of the nature of these works, their extent and whether they will in fact be required.
- iv. Reference is made to a laydown area adjacent to the bridge at Marlesford. The laydown area is on private land and no direct approach has been made to the landowner on the extent of the land required for the laydown area, although a red-line plan is included in the DCO.
- v. The proposed laydown area is regarded as being unsuitable as it lies within Flood Zone 3 (high risk) and is also regarded as a valuable habitat for a range of wildflowers (including orchids). The River Ore provides habitat for aquatic fauna including otters and water voles which are both protected species.
- vi. We have concerns about the congestion that will be caused on the A12 through Marlesford in particular, but also in other villages on the unimproved stretches of the A12 as a result of cumulative impacts from the Scottish Power Renewables and Sizewell C projects requiring infrastructure modifications. This will lead to extended chaos if the works cannot be coordinated. The case for a Four Village Bypass of not only Farnham and Stratford St Andrew, but Little Glemham and Marlesford as well, has never been more compelling. The

cumulative impact of the East Anglia One North and East Anglia Two traffic and that associated with the construction of Sizewell C underlines the necessity for radical improvements to this stretch of the A12, the plans for which have been on the table since the late 1980s.

- vii. The junction of the A12 and the A1094 (Friday Street) is a particular concern. It is now proposed to be signalled junction, but we have concerns that at peak traffic periods congestion at the A12/A1094 junction will tail back in to villages on the A12 to the south.

3. Marlesford Bridge

a) Bridge Works

Chapter 26 of the Environmental Statement (Volume 1) contains the section on Traffic and Transport. Table 26.2 appears at page 7 and refers to Offsite Highways Improvements. However, as is the case elsewhere, there is scant detail on the nature of the works to Marlesford Bridge.

Table 26.2 Offsite Highway Improvements

Location	Description of temporary alterations	Where addressed in this chapter
A12 / A1094 junction	Road safety improvements including a reduction in the posted speed limit and the provision of enhanced warning signage and 'rumble strips'.	Section 26.6.1.10 includes further details and the rationale for these measures.
A1094 / B1069 junction	Localised vegetation clearance and creation of temporary overrun areas to facilitate the movement of abnormal load vehicles through this junction.	Section 26.4.3.1.5 provides details of the abnormal load assessment and proposed highway alterations.
Marlesford Bridge (A12)	Potential structural alternations to the existing bridge to facilitate the movement of abnormal load vehicles over this bridge.	

The Applicant, using the same wording each time, states at various points in the DCO Documents (eg at EA1-N, Chapter 27, Human Health, Environmental Statement, Volume 1, 6.1.27 Human Health, Page 5 at Sub-section 27.3.1.1.1 Offsite Highway Improvements para 21 : *“Offsite highway improvements may take place at three locations; the A1094 / B1069 junction, the A12 / A1094 junction and Marlesford Bridge. These works are part of the onshore preparation works which may take place prior to the commencement of main construction. Therefore, detailed assessment of these works does not form part of the assessment of construction impacts presented in section 27.6”*. The Applicant goes on to say that further detail of the proposed works is shown at Chapter 6, Project Description, Environmental Statement, Volume 1 pg 79., however at para 343 on that page, the only description is:

“Marlesford Bridge –

- o Structural works to accommodate Abnormal Indivisible Loads;*
- o Temporary laydown area to facilitate structural works;*
- o Temporary alternative routing of PRow (reference: E-387/009/0)*
- o Temporary moving or socketing of street signs; and*
- o Temporary moving of street furniture”.*

For potentially major road works on the important A12 this seems to be a woefully inadequate level of detail and at no point in the DCO Document is it clear whether these

works are to proceed or not. If the works were to proceed as outlined, there is likely to be a compulsory purchase of the land required for lay-down. To date no approach has been made to the landowner concerning such a purchase.

The need to widen and strengthen Marlesford Bridge only arises if AILs cannot be brought into Belvedere Yard, Lowestoft. If this facility were available, then AILs would approach Friston from the north, thus avoiding Marlesford Bridge. I would urge the Examining Authority to closely assess whether this option has been properly evaluated before the Marlesford site is chosen, as the traffic disruption to the A12, at a time when SZC traffic may also be using this stretch of road, will be considerable. There is no indication of whether the A12 would have to be closed in order for the Marlesford Bridge works to be carried out, but this would lead to huge congestion as the only way to bypass the bridge is a circuitous diversion through narrow country lanes. This option would not be acceptable to either local residents or other users of the A12.

It is not clear from the DCO documents how many AILs will potentially use the A12 at Marlesford over the construction life of the Friston project. Two transformers are likely to be imported to the Friston site and will be classed as AILs, but it is unclear whether other deliveries to site will be AILs.

The review of construction material and AIL delivery via the Beach Landing Facility (BLF) for SZC ought to provide an opportunity for the Applicant to make use of the BLF for its own AIL deliveries. I therefore ask the ExA to strongly urge the Applicant to examine this option in light of EDF's emerging plans.

b) Flood Risk

The land edged red to the north of the A12 in the plan below, (known as Station Meadow) is low lying, is adjacent to the River Ore and floods.

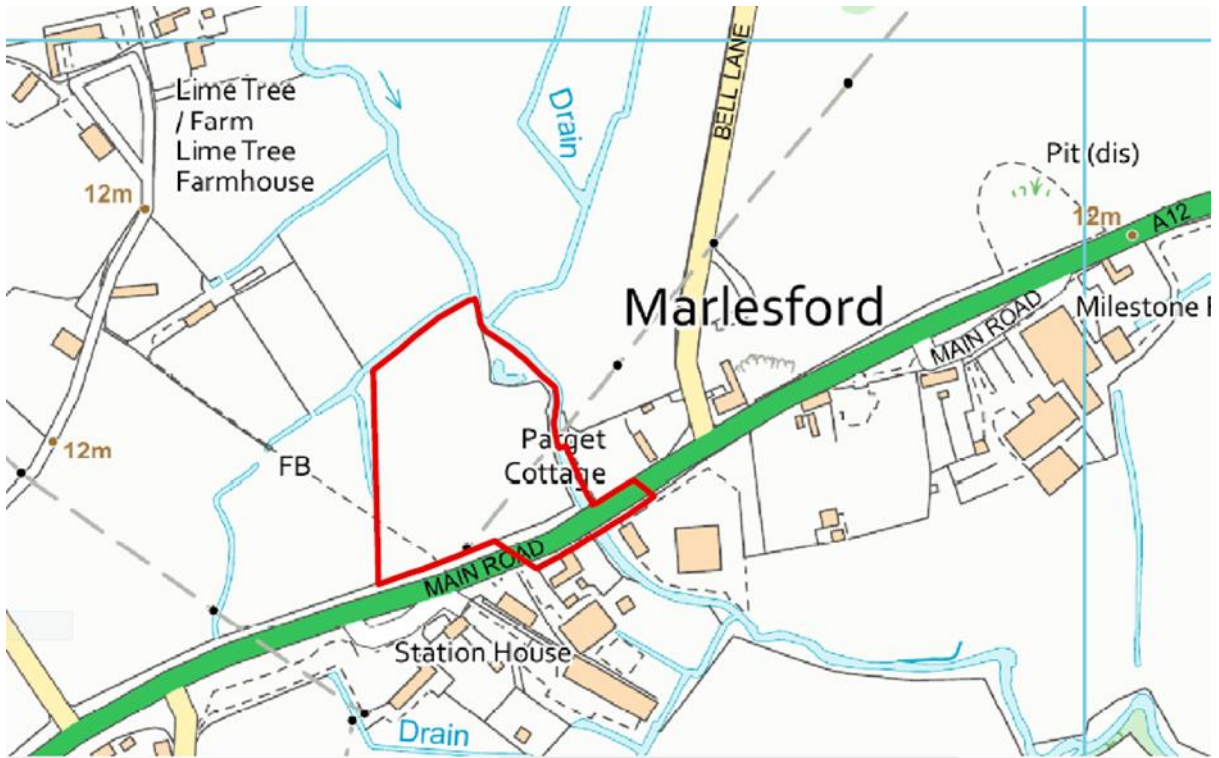


Fig. 1 Redlined proposed laydown area (Source: Section 6.2, Figures (Volume 2) 6.2.6.2 EA1N Figure 6.2 Sheet 5)

At Chapter 20, Water Resources and Flood Risk, Environmental Statement, Volume 1 pg 4 the Applicant states at Para 14: *“The offsite highway improvements will not require a large quantity of plant and equipment and the works will have a small footprint, mostly within the existing highway boundary. The potential exception is works at Marlesford Bridge which would be in proximity to the River Ore. If improvements are needed, further detail of the work required at Marlesford bridge will be developed and the precise working methodology will be agreed post consent through an application for an environmental permit from the Environment Agency (e.g. a Flood Risk Activities Permit for works directly affecting a main river and its floodplain, if required)”*.

In their Relevant Representation, the Environment Agency made the following comments:

“Document 6.1.6 Environmental Statement Volume 1 Chapter 6 Project Description

1.1 Regarding on-shore works and road modifications, section 6.7.3.3.2 outlines the offsite highway improvements required as part of the scheme. These are stated to include structural works to Marlesford bridge, where the A12 crosses the River Ore, to accommodate Abnormal Indivisible Loads; and an associated temporary laydown area on the north side of the A12/west of the River Ore.

1.2 The River Ore is a statutory main river at this location. Therefore, a flood risk activity permit under the Environmental Permitting (England & Wales) Regulations 2016 will be required from the Environment Agency prior to any works being carried out in, on, over, under or within 8m of the top of the bank. Permit conditions are likely to include registering with the Environment Agency’s flood warning service.

1.3 The associated temporary laydown area as indicated in figure 6.6k, is in an area shown by the Flood Map for Planning to be Flood Zone 3 (high risk). Furthermore, the Suffolk Coastal and Waveney District Council Level 1 Strategic Flood Risk Assessment (SFRA) (April 2018) shows the majority of the area to be within the functional floodplain (Flood Zone 3b). This is land classified as having a 5% Annual Exceedance Probability (AEP) of flooding (also known as a 1 in 20 year return period).

1.4 This site has not been considered within the Environmental Statement Volume 3 Appendix 20.3 Flood Risk Assessment.

1.5 Document 6.1.20 Environmental Statement Volume 1 Chapter 20 Water Resources and Flood Risk discusses the proposed offsite highway improvements, including the works to Marlesford bridge, at Section 20.3.1.1. It is highlighted that these onshore preparation works are not considered as part of the assessment of construction impacts in section 20.6; but that due to the small scale and temporary nature, along with adherence to best practice measures in Table 20.3, there will be no adverse impacts on surface water bodies (including through increased sediment supply or accidental release of contaminants) or changes to surface water run-off.

1.6 No further detail on how the temporary laydown area will be used is provided within the application. We are generally satisfied with the measures proposed to protect water quality during the works (see also section 5 of this response), but further detail is required due to the flood risk at the site. The use of the site as a laydown area will only be acceptable if it can be confirmed that there will be no land raising or built development on site. The nature and duration of use should also be confirmed."

We would agree with the concluding comment by the Environment Agency. Nothing should be done to impede the flow of flood water through the site and any works should not be elevated above current ground level. I also agree that much greater detail is required on the scale, form and duration of the works.

The photos below illustrate the low-lying nature of the land identified for the laydown area and its proneness to flooding.



Fig. 2 Looking South from the proposed laydown area toward the A12.



Fig. 3 Looking Southwest from the proposed laydown area towards the A12.

The Applicant should also state what process it has used to identify alternative sites for the lay-down area and if identified, why they have been excluded.

c) Archaeology and Historic Monuments

There appears to be no mention in Document 8.5 “Outline Written Scheme of Investigation: Onshore” of the Grade II listed properties (shown purple on the plan below). All three of the properties illustrated are in close proximity to the possible works and further detail is expected on how these heritage assets will be protected in the event that the works go ahead.

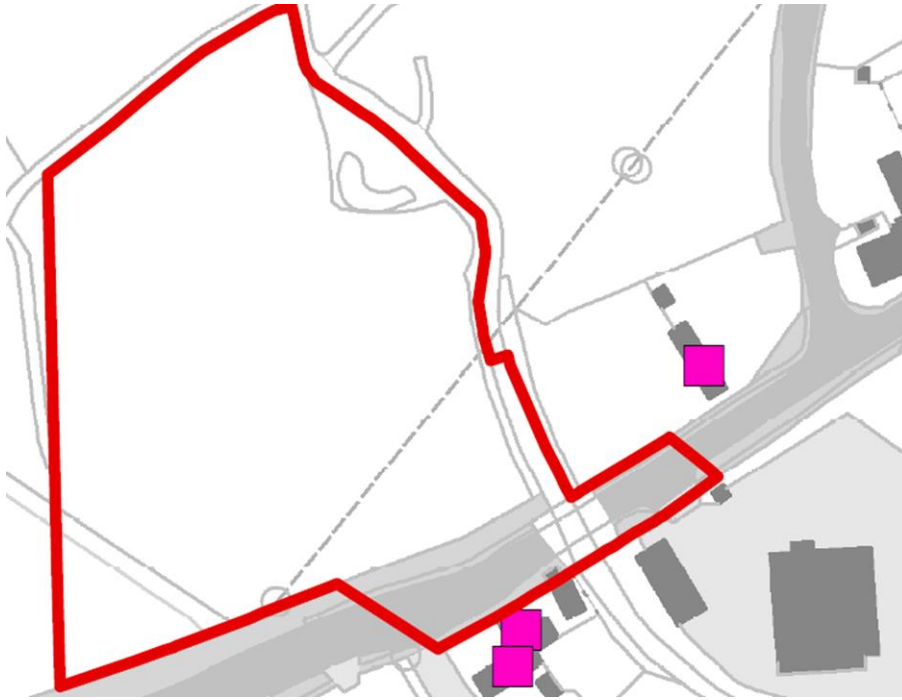


Fig. 4 Plan of Area taken from DCO Applications, EA 1-N, 2.7.2 Non Statutory Historic or Scheduled Monument Sites Features onshore

The possible laydown area is within the general area of a Roman/Romano British settlement at Hacheston. It seems likely that this settlement's influence may have extended to the River Ore at Marlesford. Station Meadow (the site of the possible lay-down area) has been largely undisturbed (certainly in living memory) and I would expect, if the development went ahead, that a full archaeological investigation of the site should take place.

d) Ecology

The Applicant fails to make specific reference to protected species at the Marlesford Bridge site. There are known to be otters and water voles in the River Ore. Both are protected and should the works go ahead, the Applicant must demonstrate how the works will be carried out without disturbance to these two species and any others that may be identified in ecological surveys.

Station Meadow is a flower rich water meadow containing a number of species of orchid. In Document 6.7, Onshore Schedule of Mitigation, 1.2 Schedule, at 5.12 Section 22.6.1, "Ecological features of reinstatement" the Applicant states, "*Following the construction phase, habitats will be fully reinstated as far as reasonably practicable. Reinstatement will be conducted in accordance with the EMP and LMP*". If Station Meadow were to be used, it is almost impossible to conceive of how an established wildflower meadow with orchids could be reinstated within a reasonable period of time. The Applicant is therefore asked to identify and strive to use an alternative and less sensitive site for the lay-down area.

I ask the ExA to urgently request further and better detail from the Applicant on its intentions for all aspects of its possible works to Marlesford Bridge.

Richard Cooper

On Behalf of Marlesford Parish Council

2nd February 2021.