

Submission for Deadline 6

Written Summary of Oral Case – Compulsory Acquisition Hearing 2 (CAH2) Tuesday 16th February 2021

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

Registration identification numbers 20024395 and 20024397.

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. East Anglia ONE North Limited and East Anglia Two Limited (the Applicants) have indicated that strengthening of Marlesford Bridge on the A12 may be required in order that it can bear heavy and Abnormal Indivisible Loads (AILs) if the route from Port of Felixstowe to Friston is used for this traffic. As part of the bridge strengthening works, the Applicants have indicated that they would need a laydown area to the north west of the A12, (immediately to the west of the bridge) on land owned by Mr and Mrs Kenyon of Lime Cottage, Marlesford. The land could potentially be the subject of a temporary possession order. Mr and Mrs Kenyon have had no indication that the land will be required for laydown purposes, but within the DCO lodged by the Applicant, a red line has been drawn round Station Meadow and is referred to in the Applicants' documents at 2.2 Land Plans as Plot 182 (see Fig. 1 below) and at 2.3.1 Works Plans (On Shore) as Work No. 37. Mr and Mrs Kenyon oppose the use of their land for laydown for the reasons set out below and in this they are supported by Marlesford Parish Council.



2. Reasons For Objection to the Use of Station Meadow as a Laydown Area

- i. As stated in my Written Summary of Oral Case (ISH4) at Para 2 vi, we have serious concerns about the impact of heavy and slow-moving loads on this unimproved stretch of the A12. It currently becomes congested at peak times of the day and in the summer. This is without the cumulative impact of the EA1-N and EA2 projects and the construction traffic for Sizewell C.
- ii. It is believed that Station Meadow has not been cultivated for many years (probably more than 50 years) and as a result, it has a well-established wet meadow flora which includes several species of orchids. This valuable habitat could be destroyed if the Applicants used the land as a laydown area, even if nits use was only temporary.
- iii. Station Meadow lies beside the River Ore. As quoted in my Written Summary of Oral Case (ISH4) at 3 b) the area is low-lying and regularly floods during the winter. The photographs below were taken in January 2021 and show the extent of recent flooding. Environment Agency state in their Relevant Representation at 1.3 that *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 having a 5% Annual Exceedance Probability (AEP) of flooding (also known as a 1 in 20 year return period).*



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

The fact that the land lies within functional floodplain causes concerns that any development on it could disrupt flood water flow and exacerbate the current flood risk.



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

- iv. The River Ore in this area is known to provide habitat for otters and water voles – both protected species. We would argue that the Applicants have not shown in the DCO application that if Station Meadow was required to be used, the habitat of these protected species would remain undamaged.
- v. 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 Mr and Mrs Kenyon would argue that the use of Station Meadow for a laydown area risks disturbing potentially important archaeological features and artifacts.

3. The Need for Strengthening Works to 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.

4. Proving the Case for Using Station Meadow as a Laydown Area

a) No Case Made

We argue that the Applicants have not made their case for either the strengthening of Marlesford Bridge or the temporary possession of Station Meadow as a laydown area (should works be required on the bridge).

b) The Effect of Delay

By delaying their decision on the route to be used for AILs and heavy loads, the Applicants are narrowing the opportunity for issues relating to such routes to be considered within the Examination process. The Applicants’ proposals for Marlesford Bridge (such as they are) will have a material impact on Mr and Mrs Kenyon and on users of the already congested A12 through Marlesford.

I urge the Examining Authority to ensure that the Applicants are required to disclose their full plans for the routing of AILs and heavy loads prior to the end of the Examination in order that consideration can be given to whatever proposals they present.

Richard Cooper

On Behalf of Marlesford Parish Council

23rd February 2021.