

From: [REDACTED]
To: [SizewellC](#)
Subject: Final Submission - Ref 20025646
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Attachments: [Submission to Planning Inspectorate 5.doc](#)

On behalf of Darsham PC I wish to submit our final submission which exceeds 1500 words.

Summaries are Items notated numbers 1 & 12.

Please find our submission for this stage attached,

Thank you,

Cllr Michael Simons

Darsham Parish Council

Submission to Planning Inspectorate re EDF's DCO for Sizewell C & D.

1. Introduction and scope of submission.

While Darsham Parish Council (DPC) shares the wider concerns about the impacts of EDF's proposals on transport, environment and tourism with the majority of local Parish Councils, and supports the views of the Environment Agency and national and local conservation groups, our submission concentrates on the siting and impacts of the Northern Park and Ride (NPR) which is located within the Parish Council boundary.

2. Consultation responses.

The concerns listed below have been detailed in our responses to each of the four consultation stages carried out by EDF. It is fair to say that these detailed concerns, which are shared with other local parishes, have been largely ignored. As such, the term “consultation” is a complete misnomer. However, a team from EDF held a Zoom meeting with representatives from DPC in February 2021. Remarks from that meeting are incorporated below.

3. Traffic flow and congestion (1)

It should be noted that the traffic flow data survey carried out by the applicant is suspect, in that it was taken mid-day, mid-week during “lockdown” when road volume was minimal. Clearly this was not representative, understating both the realistic volumes and vehicle mixes.

EDF have consistently underestimated traffic flows on the A12. The A12 is a single carriageway road in this part of Suffolk and extremely busy with tourist traffic for large parts of the year. As such any road works or traffic accident is likely to cause major congestion. This was vividly demonstrated in summer 2020, with increased traffic volumes due to the COVID-19 pandemic and a considerable increase in tourism “staycations”. On two occasions, (one accident, one road repair) slow-moving traffic has tailed back five miles to Saxmundham. In addition, slow moving agricultural vehicles often cause long tailbacks.

4. Traffic flow and congestion (2)

EDF project 1,140 private car, 700 minibus and 700 HGV movements each day. The proposed construction of roundabouts at the NPR junction at Willow Marsh Lane and at the B1122 junction in Yoxford, will cause congestion on this whole section of the A12. Darsham has increased in size by 30% in the last few years. The proposed development of a further 120 houses accessing the A12 near the Westleton Road, an 80-bedroom motel adjacent to the Jet Garage, 170 holiday lodges on the grounds of High Lodge, and the proposed increase in train numbers and level crossing closures will greatly exacerbate this congestion.

EDF do not accept our assertion that their traffic estimates are understated, a concern shared with Suffolk CC, nor do they accept that the NPR will lead to the gridlock that we anticipate.

5. Level crossing closures

The level crossing is closed overnight for routine maintenance at regular intervals, with traffic diverted down The Street through Darsham village. EDF have chosen to ignore this and not responded to our requests for alternative proposals or mitigation arrangements.

6. Dark skies

Darsham is a dedicated dark sky village and home to the Darsham and Surrounding Villages Astronomical Society (DASH – Astro). EDF propose low level lighting in the NPR, but mandatory Trunk road lighting on the NPR roundabout will destroy this amenity.

7. Rat-running & fly parking

DPC have expressed concerns about rat- running down The Street during traffic congestion on the A12 or during level crossing closures. EDF say they will install ANPR cameras to detect and subsequently ban HGVs, but have made no proposals to control LGVs and private cars. As evidenced at Hinckley C, residents have had to endure fly parking of epidemic proportions.

8. Noise and pollution

DPC have serious concerns about traffic noise, vibration and pollution* (NOx, CO2 and particulates) as a result of congestion from increased traffic movements from the NPR, HGVs on route to Sizewell, all in addition to existing A12 traffic.

EDF have dismissed these concerns.

9. Legacy provisions

There are no proposals for pedestrian access to and from Darsham Station and the NPR. Pedestrians will have to walk along the A12 whilst at night there is no low level footpath lighting planned. There are no legacy provisions for improved carparking at Darsham Station which was specifically requested by DPC.

We understand from EDF that future restoration of the NPR site may preclude these provisions.

10. Geology, drainage and flood risk (Additional Report now added)

New research information has revealed that there could be drainage and flood risk problems associated with the NPR. EDF have proposed a storage basin with overflow to existing watercourses running under the railway. The underlying geology prevents natural drainage within the site and is likely to lead to existing water courses being overwhelmed in heavy rain.

EDF do not appear to acknowledge the potential flood risk to the railway (due to run-off from the NPR)

11. Traffic constriction

Likely traffic flows associated with the NPR and direct Sizewell traffic, in addition to existing A12 traffic will lead to serious congestion exacerbated by the construction of two roundabouts, local development and particularly, increased level crossing closures. **The resulting noise, vibration, air pollution and rat-running and fly parking on side roads will seriously erode local residents' quality of life.**

These concerns have either been ignored or dismissed by EDF and no mitigation measures proposed.

12. Summary

Taken as a whole, Darsham Parish Council conclude that siting the NPR north of Darsham Station on a single carriageway section of the A12 adjacent to a level crossing is a serious mistake. (The Southern Park and Ride is located off a dual carriageway). If the NPR proceeds as currently proposed, it will have a serious impact on the quality of life of the residents of this Parish and, in the absence of any mitigation measures, their right to the quiet enjoyment of their village and surrounding environment.

Darsham Parish Council

(CP & MS)
April 2021.

Additional Report – NPR Geology, Drainage & Flood risk

The Darsham Park & Ride as you will know is wedged between the A12 north of the station and the railway line north of Darsham. In the following paragraphs I lead you through the details and where the details are flawed due to an error in the Flood Risk Assessment for the site. I hope it is all self-explanatory and is in such detail that you hopefully understand the issue when the matter is probed by the Planning Inspectorate examiners at a later date.

Book 6 Environmental Statement section 7.4 Volume 3 has documents related to ground conditions at the site in Chapter 11. At paragraph 11.4.7 page 19 it summarises the findings from Appendix 11A which contains what is called the Phase 1 Desk Study report - that is a collation of the published knowledge of ground conditions. Reference is made therein and in paragraph 11.4.7 below to BGS - this is the British Geological Survey that maps the geology/groundwater in the UK, has an archive of borehole data and collates and undertakes research.

Paragraph 11.4.7 states

Available BGS records indicate that the site is largely underlain by superficial diamicton (boulder clay) deposits of the Lowestoft Formation, which comprise an extensive sheet of poorly-sorted matrix-supported chalky till as well as outwash sands and gravels, silts and clays. A thin strip of land adjacent to the western site boundary is shown to comprise Head (windblown) deposits, comprising clay, silt, sand and gravel deposits.

In more layman terms the bulk of ground (referred to as Lowestoft Till) can be expected to comprise of material laid down under the ice sheet that covered the area in Glacial times. The predominant material in these deposits is clay. There are sometimes isolated boulders and occasional sand and gravel, the latter sometimes as a layer of material but these are usually limited in extent. Clay has a very low ability to let water drain through it to underlying layers i.e. it has a very low permeability.

The other deposit referred to is Head which, as stated, is a mix of materials but it will be thin and lie upon the Lowestoft Till. With the expected presence of clays and silts in the Head it is also likely to have a low permeability.

The ground underneath the site is thus expected to have very limited capacity to transfer water to much deep underlying, more permeable ground.

Bizarrely, the ground conditions are referred to in the Flood Risk Assessment (FRA) for the Northern Car Park, Book 5 Volume 5.3 paragraph 5.5.2, are different as it states as follows

*As the site is located on a bedrock formed of sand and **a superficial deposit consisting of sand and gravel**, the ground conditions have infiltration drainage potential.*

I have highlighted the disparity with the details in the document referred to earlier. In my view the FRA is fundamentally flawed by this erroneous statement and this has led to a design that is inappropriate.

Cont'd

Despite the very obvious limitations on the ground's ability to drain surface water down to underlying more permeable ground the erroneous FRA statement has led EDF to propose the extensive car park and roads will have surface water draining into a pit dug on the site, referred to as infiltration basin on the plans - see below for where the plan is*) which is meant to allow the water to soak away into the natural ground. They have also incorporated open U or V shaped trenches called swales also designed to act as a soakaway feature. As all the features are in low permeability soils. In all probability this design will not be able to cope with the rapid flows of water into it from the car park and roads when a major storm occurs.

***The most useful plan showing this can be seen in Book 2 Plans, Volume 6 Northern Park and Ride - plans for approval page 4 of 7.**

The site falls in level towards the railway and from the plans there is an agricultural ditch that current collects any rainfall runoff which drains under the railway north of the station (see the thick blue lines on the plan - green where it passes under the railway in a brick culvert). Any overflow from the car park drainage features will naturally go to that existing feature. The ditch is, I suspect, not capable of accepting any significant increase in flows and there is no detail on the culvert. It may be the culvert that restricts the ability of the existing ditch to take more flow. If not, then the capacity of the culvert under the A12 south of the station may be critical - an area with historical flood issues - see page 16 of the Flood Risk Assessment for the Northern Park and Ride

EDF's FRA in a later part of paragraph 5.5.2 to the quote above says

However, there is the possibility the infiltration rates may not be suitable to discharge all the surface water to ground and that some surface water may need to be discharged to the local watercourse network.

Nothing like backing two horses. In the set of Not for Approval plans in **Book 2 Plans, Volume 6 Northern Park and Ride page 4 of 25** you will see very thin blue lines connecting many of the swales and the infiltration basin to the existing agricultural drain/ minor watercourse with the words on the plan 'Outfall to Existing Ditch'. Naughty; why are these details not in the Plans for Approval? From reading the FRA I suspect EDF have not assessed the ability of the existing ditch/culverts to cope with any additional flows as the flaw in the earlier quote above from paragraph 5.5.2 made EDF only see that as a very low probability requirement and only requiring a limited flow into the ditch.

Cllr Robin Sanders, Woodbridge.

Member of the Geological Society of London

Member of the Institution of Mining, Metallurgy and Mineral

Chartered Member of the Institution of Highways and Transportation