



**Deadline 2**  
**Submission to Planning Inspectorate**  
**Written Submission of Oral Case**  
**On behalf of Marlesford Parish Council**

**Regarding**  
  
**NNB Generation Company (SZC) Limited**  
**DCO Application**  
**For**  
**Sizewell C New Nuclear Power Station and Associated Works**

**Cllr Richard Cooper**  
**Marlesford Parish Council**

**Melanie Thurston**  
**Parish Clerk**  
**marlesfordpc@gmail.com**

**2<sup>nd</sup> June 2021.**

## **Introduction**

1. Marlesford Parish Council (MPC) highly concerned by the impacts on this village of the Applicant's proposals for Sizewell C (SZC). We believe that quality of life will be greatly impaired over the likely 12 year build period and for many of our older residents, the impacts will be felt for the majority of their remaining lives – that is a very sad prospect for those who have long enjoyed the relative tranquillity of this village.
2. Whilst we acknowledge that there may be some benefits to the East Suffolk community from SZC, (for example, employment opportunities, opportunities for local businesses and the inflow of substantial business rates), we feel that these benefits do not outweigh the huge burden that this area will have to bear on behalf of the rest of the country. The impact of SZC during the construction phase will be felt in East Suffolk on many fronts, including increases in traffic (particularly HGVs using the A12), pressure on rented accommodation and adverse effects on tourism.
3. At Stage 4 consultation MPC withheld its support for SZC on the grounds that insufficient information had been provided on the proposals. MPC's position has now shifted to one of opposing the Applicant's proposals for Sizewell C in their current form. MPC feels that key areas such as freight strategy, various aspects of ecology and general impacts on the communities and landscape of East Suffolk have been dealt with in insufficient detail and despite engagement in the consultation process we feel that the concerns of this, and neighbouring parishes have not been fully addressed by the Applicant.
4. MPC and neighbouring parishes of Wickham Market, Hacheston, Campsea Ashe, Pettistree, Little Glemham and Parham have identified areas of common interest and many of the issues set out below are shared concerns with our neighbours. However, in this submission MPC has confined its comments to the four topic areas below:
  - Two Village Bypass (TVB)
  - Broader issues of the A12, Freight Strategy and Traffic Numbers
  - Southern Park and Ride (SP&R)
  - Wickham Market and Surrounding Area Traffic Issues

We believe these issues will have the greatest impact on our community. We will leave others who may be more directly affected by other matters or who have greater specialist knowledge, to comment on other issues, amongst which we would expect to see concerns about the Applicant's ability to deliver the whole project, the impact of SZC on the Suffolk Coasts and Heath AONB, its impact on coastal processes in the Sizewell area, concerns about potable, non-potable (including irrigation) water supplies and impacts on tourism and the local economy.

## **Topic Areas of Concern**

### **Two Village Bypass**

5. MPC does not support the proposals for the TVB of Stratford St Andrew and Farnham. This is on the grounds that the proposals do not allow for a comprehensive long-term strategic bypassing solution for the A12 at Marlesford and Little Glemham which would provide the only conceivable long-term solution to the growing traffic problems faced by these communities.
6. Both Suffolk County Council (SCC) and East Suffolk Council (ESC) recognise that the TVB is "the least worst option" and both would have preferred to have delivery of the Four Village Bypass (FVB) (originally approved in 1995). In 2017 a Four Village Bypass was part of Suffolk County Council's strategic plans when

it consulted on Suffolk Energy Gateway or SEGway – it is ironic that they have so far been unable to find a way to deliver SEGway, despite the emerging energy development on the East Suffolk coast that the bypass was supposed to serve. This village and our neighbours in Little Glemham will continue to press for a Four Village Bypass. But our major concern is that if the FVB cannot be delivered in time for the major SZC construction, the design of the TVB must be such that it can allow the future delivery of the FVB.

7. It is widely accepted that the proposed alignment of the TVB and particularly its southern junction with the A12, will preclude the eventual delivery of the Four Village bypass of Marlesford, Little Glemham, Stratford St Andrew and Farnham (SCC's SEGway). We ask the ExA to particularly note the acute angle at which the TVB swings westward at Nuttery Belt in order to join the A12 close to Parkgate Farm. This southern 1/3 of the TVB will make connection to a bypass of Little Glemham and Marlesford highly problematic, if not impossible. Strategically we believe that this failure to provide for a future connection is a gross error and we are relying on the ExA to ensure that designs are adopted that don't condemn Marlesford and Little Glemham to at least another generation without relief from growing traffic congestion on the A12.
8. In their undated Suffolk Local Transport Plan 2011-2031 Part 1 - Transport Strategy, (which remains the County's strategic transport plan), SCC states, *"There are also long-standing issues of traffic volume through the villages of Marlesford, Little Glemham, Stratford St Andrew, and Farnham on the A12. Suffolk County Council strongly supports the provision of proper relief for these communities by the provision of a relief road and will work with the nuclear industry to secure its provision alongside any new power station at Sizewell."* Regrettably, insufficient effort has been put in by a combination of the Applicant, local authorities and central government to create an imaginative means by which the FVB could be delivered. This stasis will mean that Marlesford and Little Glemham will be sacrificed as a result of the pursuit of lowest cost options to the exclusion of solutions that address the real harm that will be done to our community.
9. We draw the ExA's attention to the Relevant Representation of Farnham with Stratford St Andrew Parish Council in which the Council says, *"We are wholly dissatisfied with Applicant's intransigence in continuing to single-mindedly pursue a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment which has the support of our residents, this parish council, our County Councillor and others"*. We also refer the ExA to the comments made by Farnham Environment Residents & Neighbours Association (FERN) in their response to Draft Itinerary for the Accompanied Site Inspection [REP1-133] in which FERN rightly argues that the route to the east of Foxburrow Wood would provide the best chance of achieving an alignment that would connect with a bypass of Little Glemham and Marlesford. At the same time, it would achieve a better separation from the heritage assets around Farnham Hall (actually eleven dwellings rather than the one entity that that Applicant refers to) and it would avoid disturbing valuable natural habitat which it is believed has been under-valued and mis-reported in the Applicant's habitat assessments.
10. In a recent letter to the Chairman of Marlesford Parish Council [REP1-151] Suffolk's Police and Crime Commissioner, Tim Passmore said of the A12 through Marlesford, *"This particular stretch of this ancient highway has received no significant improvements in living memory and is very clearly not fit for purpose. It presents a significant danger to all road users, including pedestrians and cyclists. Keeping the traffic flowing on this major route is essential for the general well-being and prosperity of the county"*. This highlights the real safety concerns that this village faces.

### **Broader issues of the A12, Freight Strategy and Traffic Numbers**

11. It is unclear at the moment how the Applicant's January 2021 change proposals will affect HGV and train numbers supplying construction materials to the SZC site. Until we understand how many trains will be used and how much material will be brought in by sea we cannot form final conclusions on the impact on this village – but we have to anticipate the worst. And in fact in their East Suffolk Council and Suffolk

County Council Joint Local Impact Report (LIR) [REP1-045] at Para 15.1 confirms that *“The uncertainty of delivering additional train movements on the East Suffolk Line poses a risk of a significant increase in the number of HGV movements on the road network, which would further exacerbate these impacts unless controlled. Timing of delivery of the BLFs will also need to be clarified as an integral part of the freight management strategy proposed”*. Notwithstanding this uncertainty, in its original DCO application documents at Book 8, Chapter 8.5, Transport Assessment [APP-602] Para 10.2.25 states that *“Daily traffic flow volumes are predicted to increase above reference case levels on the A12 in the vicinity of southern park and ride facility by around 15% in the early years phase and by around 133% at peak construction.”*

12. Even if we take the Applicant’s most optimistic assessment of HGV reductions as a result of the change proposals it still results in 1,000 extra HGV movements per day through Marlesford and Little Glemham at peak. That equates to roughly an additional bus or HGV every minute through the main part of the SZC working day. MPC regards the A12 through Marlesford as wholly inadequate to carry the increased traffic arising from SZC and Scottish Power Renewables construction projects. We will challenge assumptions made on cumulative impact. The Applicant argues that the A12 in Marlesford has the capacity to take the additional Sizewell C traffic. Technically, that may be true, but the lived experience of Marlesford residents suggests that the A12 in the village is at capacity already. If you are a resident or business or the customer of a business in Marlesford, the experience of turning right i.e., crossing the traffic is highly problematic and the wait can be substantial. The Applicant argues that none of the junctions are at capacity, but the problem is not the amount of traffic entering the A12, but the volume on the A12 itself and the delays that causes. The LIR acknowledges this at para 36.77 when they say *“The increase in construction traffic along the A12 will also reduce exit capacity for the large number of side roads and accesses along the road, reducing the capacity to undertake a safe manoeuvre from these side roads, increasing delay, the likelihood of crashes and reducing access to facilities, which will be of great concern to local communities.”* They also acknowledge the adverse cumulative impact of a number of major energy projects in the area, in addition to unprecedented housing developments in neighbouring towns and villages.
13. At Para 32.38 of the LIR, the joint councils state *“Some communities located along the A12 corridor would suffer from cumulative impacts taking into account non-Sizewell C projects. Taking into account East Anglia One North and East Anglia Two, Little Glemham and Marlesford would experience an increased impact from fear and intimidation, from minor adverse to moderate adverse”* and at Para 36.78 they go on to say, *“Taking into account cumulative impacts from East Anglia One North and East Anglia Two, the cumulative traffic impact on fear and intimidation in Marlesford and Little Glemham rises from minor adverse to moderate adverse. This is a significant effect.”*
14. The unimproved A12 through Marlesford and Little Glemham severs our two communities and presents significant problems for the elderly, children and parents with pushchairs or prams. The Applicant has admitted that the volumes of traffic generated will have a Moderate Adverse Impact on Fear and Intimidation – we should not be putting any of our residents in a situation where they are fearful of, or intimidated by traffic generated by the Applicant. We and Little Glemham PC are in discussions with the Applicant on various mitigation measures that would provide safe crossings and improved footpaths. We await further details of the proposals from the Applicant and we expect the measures to be covered in the s106 agreement and we view them as a potentially useful legacy benefit. But in reality, this will only be a sticking plaster over the much longer-term issue of increasing A12 traffic and the need for a Four Village Bypass. At Para 17.33 in the LIR, the Councils state, *“In Marlesford the effect on fear and intimidation increases, however the transport assessment addendum [AS-266] considers the overall effect to be minor adverse - not significant. The Councils do not agree with this assessment - as noted in the transport section (paragraph 15.103). Marlesford has been identified by the Councils as a location of particular concern with regard to increased severance, fear and anxiety of vulnerable road users and reduced amenity.”* We agree with this assessment by the local authorities and others set out above but argue that they are being insufficiently robust in delivering measures to properly address the impacts.

15. As residents of Marlesford, we know that the junctions of Bell Lane/A12 and Marlesford Road/A12 are dangerous and MPC disagrees with the Applicant that, *"As no capacity problems are foreseen no mitigation is proposed or deemed necessary at the existing junction"* (see DCO Application Documents, Book 8, Other Documents, 8.5 Transport Assessment 9.29.1 - 9.29.17).
16. Marlesford has a number of properties which front directly onto the A12 and the cumulative impact of increased traffic will adversely impact affected residents. MPC will argue for A12 baseline studies of noise, air quality and vibration before construction. Monitoring should continue during construction and for an agreed period after the construction phase ends.

### **Southern Park and Ride - Hacheston**

17. We oppose the SP&R in its proposed location, and we argue that ESC and SCC have not done enough to either find or develop alternative sites (Martlesham Park and Ride is a case in point) or hold the Applicant to account in order to achieve the best mitigation if the proposal for the SP&R goes ahead. The elevated position (DCO Application Documents, Book 6, 6.5, Volume 4, Chapter 6, para 6.4.12) [APP-390] of the SP&R makes the site an inappropriate one and is the reason that we have opposed its location. The site is located between the two Special Landscape Areas of the Rivers Deben and Ore (Policy AP13 Special Landscape Areas, Suffolk Coastal Local Plan, Saved Policies July 2013). That policy states that *"The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality"*, we contend that the development of the SP&R in this location will detract from the quality of the landscape. In the East Suffolk Council - Suffolk Coastal Local Plan (Adopted September 2020) Policy SCLP10.4 states, *"Landscape Character Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence."* It goes on to say, *"Proposals for development should protect and enhance the tranquillity and dark skies across the plan area. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character"*. But at Para 12.93 in the LIR the Councils state *"There will be a low level of harm to the Conservation Areas of Marlesford and Wickham Market. Given the assessed minor adverse effect on historic landscape character from the construction of the Southern Park and Ride between the Conservation Areas, there will be a low level of harm arising on their significance from this development within their setting. In the event that the site is consented we will require screening commensurate with its sensitive landscape location"*. We welcome the commitment on screening, but we believe that by the Councils' own standards contained in their landscape policies, they have grossly underestimated the impact on the landscape of the proposed SP&R. We believe that the test should be that if any other "stand-alone" commercial development in this location would have been turned down by the planning authority, then so should this proposal for the SP&R, and in this location it should not have the protective benefit of being part of an NSIP.
18. At Consultations 3 & 4 we understood that a landscape bund would be provided along the North West boundary of the Park and Ride. In the DCO, this was cut by half. Having complained to the Applicant about this change, the bund was reinstated in the Change Proposals. Was this piece of critical landscaping sacrificed in the DCO in order to make a virtue of reinstating it at the 11<sup>th</sup> hour and 59<sup>th</sup> minute?
19. Important aspects of the site are shown on plans as "Not for Approval" including detail on buildings, signage, drainage and lighting (see DCO Application Documents, Book 2 Plans, 2.7 Southern Park and Ride Plans). MPC will want positive assurances that these areas will be properly conditioned and discharge monitored.
20. We are particularly concerned about lighting at the SP&R. This is one aspect of the plans that are "Not for Approval" and we have a real concern that light spill will have a significant adverse impact on the dark skies of the villages surrounding the site. We do not believe that the Applicant has provided sufficient

detail on the plans for lighting and it has not provided the comfort that local villages are looking for that night-time lighting will not be intrusive. In their LIR the Councils state at Para 17.95 in relation to the Northern Park and Ride, *"The Northern Park and Ride once operational will have a minor adverse effect on receptors arising from noise of vehicles using the site, views within the site of moving vehicles and lighting within the site"*. And at Para 17.96 in relation to the SP&R *"Receptors in the vicinity of the Southern Park and Ride site are likely to experience noise and dust during construction of the site, and visual impacts"*. We believe that this wholly underestimates the impacts and does not fully deal with the problem of light spill in a dark skies area.

21. We and our neighbouring parishes of Hacheston, Campsea Ashe, Wickham Market and Pettistree will argue in detail elsewhere that a number of important viewpoints have been omitted from the Landscape and Visual Impact Assessment (LVIA) for the SP&R – we expect the Applicant to address these and we have referred to these viewpoints in our comment to the ExA on the Applicant's Draft Itinerary for Accompanied Site Inspections [REP1-152] and would ask the ExA to consider these viewpoints. A review of landscape and visual aspects of Applicant's DCO application (as it relates to the SP&R) was commissioned jointly by all four villages. The review (carried out by The Landscape Partnership) has already been submitted [REP1-149] and more fully considers the omissions referred to below and other perceived deficiencies in the landscape plans for the SP&R.

All map references below are from OS Explorer Sheet 212.

- **Campsea Ashe - Brick Kiln Cottages OS Ref. 323 566**

From public footpath Hacheston 7, which commences on Station Road adjacent to Brick Kiln Cottages, views across agricultural land are available into the body of the site.

In addition to this viewpoint, it is believed that between 25-30 properties on the north side of Mill Lane in Campsea Ashe will be able to see the SP&R site – particularly at night. We ask the ExA to consider the view from these properties towards the SP&R.

- **Hacheston - The Rookery and nearby properties OS Ref. 311 581**

From localised windows in properties in the vicinity of The Rookery and the B1116, views are available up the valley side into the western part of the site.

- **Marlesford - Marlesford Hall OS Ref. 323 586**

From most points within Marlesford Park, the site is screened by intervening vegetation and/or the roll of the topography. However, looking back towards the park from the bridleway on the western edge of the site, there is a clear line of sight to the Grade II\* listed Marlesford Hall on the opposite valley side and orientated so that its principal elevation fronts the direction of the site. It is likely, that at least the upper portions of the site, at the top of the opposite valley side, are a component of views from the Hall.

- **Public footpath Marlesford 1 OS Ref. 321 585**

From public footpath Marlesford 1, which rises up the valley side to the west of Marlesford Park, the eastern edge of the site would be visible, although the footprint of the site would be hidden by the roll of topography. Such viewpoint would be experienced from a similar elevation and aspect to Marlesford Hall.

The ExA should note that Wickham Market Parish Council will separately detail the viewpoints that they believe have been omitted.

22. The Applicant claims that in general, noise from the construction, operation and removal phases will have negligible impacts on the identified receptors (see DCO Application Documents, Book 6 Environmental Statement, 6.5, Volume 4 Southern Park and Ride, Chapter 4 Noise and Vibration) - we will challenge this. We do not believe all receptors have been considered. In particular we believe that The Ford Gatehouse and Marlesford Hall should both be included as noise receptors – the Applicant may regard them as being slightly further from the SP&R site than their nearest Marlesford receptor, but both are in positions that we believe will expose them to construction and operation noise from the SP&R. Whilst we recognise the need for safe practices on the SP&R site, during both construction and operation, we are concerned about the intrusive nature of reversing alarms and we will be calling on the Applicant to look at ways of moderating the impact of such alarms.
23. The Applicant has made a point of wanting to leave behind legacy landscape features when the SP&R is returned to agricultural use and there are opportunities to do this on the western and southern boundaries and particularly the approach to the SP&R and its southern boundary on the slip-road to the A12 and we would expect our concerns regarding old and new hedgerows and existing specimen trees to be addressed.
24. ESC has asked for electric or “Low Emission” buses to be used – we would want to go further and insist that all buses serving the SP&R are electric – we are pleased to note that discussions are ongoing between the Councils and the Applicant, but would urge the Applicant to take the opportunity, as an electricity generator, to promote the virtues of electric buses.
25. The construction start date for the SP&R is scheduled for Year 2 of the project. We believe it should be started in Year 1 to ensure the earliest and maximum capture of A12 SZC traffic.

#### **Wickham Market and Surrounding Area Traffic Issues**

26. The inappropriate proposed location of the SP&R will put enormous pressure on already congested local roads. Wickham Market is a service centre for its neighbouring villages. MPC has been working closely with its neighbouring parishes to ensure that traffic issues in and around Wickham Market are addressed by the Applicant. Dialogue is ongoing with the Applicant, but we will expect to see commitments to improvements secured early in the Examination process and enshrined in the Decision.
27. We will need to see evidence that the Applicant is taking seriously the need to direct all traffic via A14/A12 in order to alleviate pressure on the B1078. We support the Applicant’s proposals for comprehensive road signage to both the SP&R and the main construction site and we echo comments from Wickham Market Parish Council that the Applicant should not rely solely on its Code of Conduct for the appropriate routing of traffic, although we accept that it should be one component of a suite of measures.
28. We accept the Applicant’s assurances on the management and routing of HGV’s and their intention to confine them to the A12/A14 until they have to head east to the Main Construction Site, but we expect innovative technical solutions to be applied to the control of LGVs and private cars using the SP&R to ensure that traffic using the B1078 travelling from Coddensham to the SP&R is kept to an absolute minimum.
29. We support Hacheston Parish Council in welcoming the proposal to set up local transport and traffic groups [APP 602] linking the community with the developer and SCC in dealing with problems caused by SZC traffic. Marlesford Parish Council wishes to be included as a member of the groups dealing with the SP&R and A12 should the development go ahead.
30. We consider the cycle and pedestrian access to the SP&R is lacking detail. As a legacy issue we will press for a cycle and pedestrian route from the Marlesford Road/A12 junction to the SP&R. and from Wickham Market to the SP&R.

## **Conclusion**

31. This Parish Council is highly critical of the process adopted by the Applicant for consultation, DCO submission and then the subsequent change proposals. The Applicant made a virtue of consultation at each of its five stages. But we would argue that despite the appearance of consultation, the Applicant wasn't listening. Numerous consultation responses over all phases of consultation (including from SCC and ESC, as well as ourselves) stated the overwhelming preference for rail or marine led freight transport. But in the DCO we were left with a predominantly road led strategy. When we got to the consultation on the DCO changes – we were told by the Applicant that “*since submission we have continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public to gather their responses to the Application*”. We regard this as disingenuous – many, many bodies made it very clear to the Application what their concerns were early in the process. In their joint response to Stage 3 consultation ESC and SCC at paragraph 5 opposed “*The dropping of a marine-led materials transport strategy with the introduction of a road-led strategy alongside the alternative of a rail-led option. The Councils continue to support marine-led and rail-led transport strategies and have not yet seen convincing evidence that a marine-led strategy is not feasible or environmentally preferable. If the marine-led option is proven to be impossible, the Councils wish to see the rail-led strategy implemented (in accordance with National Policy Statement (NPS) EN-1 paragraph 5.13.10. The Councils are not content with a road-led option, with the significant number of additional Heavy Goods Vehicles (HGVs) resulting in a detrimental effect on Suffolk's road network.*” Comments like this should have alerted the Applicant to the problem and these concerns should have been capable of being addressed without putting hard pressed and financially stretched councils through additional work to review what should have been included at the initial DCO submission.
32. We also feel let down by the Applicant, our local authorities and central government. All are aware of the long-held view that Marlesford, Little Glemham, Stratford St Andrew and Farnham should be bypassed. The fact that in the Applicant's proposals, only Stratford St Andrew and Farnham will get a relief road fails to address the ongoing issues for Marlesford and Little Glemham and we call on the ExA to recognise that a four village bypass is appropriate and deliverable if all parties work together. A FVB is our goal, but if this proves impossible in the short term, we expect an alignment of the TVB that allows the future bypassing of Little Glemham and Marlesford as well. In the meantime, we expect the Applicant to deliver appropriate mitigation to the A12 through their s106 agreement.
33. The Financial Times reported a £20bn cost for SZC in June 2020 – but that was before the change proposals which will inevitably increase the cost. It is now nearly a year since that figure was published and this year we have seen Aviva, Prudential and Legal and General all indicate that they are highly unlikely to invest in the SZC project. If SZC were to really offer the long term, stable returns that the Applicant has claimed, then it would be expected to be attractive to pension providers. The fact that they are shying away from funding Sizewell C should make everyone pause and consider the highly dubious economics of this project.

o0o

**Cllr. Richard Cooper**  
**Marlesford Parish Council**

2<sup>nd</sup> June 2021