

WICKHAM MARKET PARISH COUNCIL



Chairman: Cllr Richard Jenkinson
Parish Clerk: Joanne Jones, Neutral Farm House, Mill Lane, Butley. IP12 3PA
Tel: 01394 459400, E-Mail: wickhammarketparishclerk@gmail.com
www.onesuffolkwickhammarket.net

Freepost SZC Consultation

20th September 2019

Dear Sir/Madam

Wickham Market Parish Council (WMPC) response to Sizewell C (SZC) Stage 4 Pre-application consultation

Please note this is our formal response to EDF regarding Stage 4 consultation in respect to the proposed Sizewell C power station. Our recent letter addressed to Mr J Crawford dated 17th September sets out concerns relating to the comments made in relation to working with WMPC and its Neighbourhood Plan committee.

We have attached, the 17th September letter and our response to the EDF Stage 3 consultation for completeness. Both letters specify our concerns with the current proposals. You may know that we responded to the PINS scoping consultation in our letter dated 20th June 2019.

1. Introduction

- 1.1. WMPC, at its meeting on Monday 16th September decided to withhold any further support and object to the current Sizewell C project due to ongoing concerns regarding the considerable traffic, highway, landscape and over-reaching environmental impacts that will be experienced by all those who live and work in the Parish and beyond. These will occur over a long time period for construction and into the future in terms of operation.
- 1.2. We are particularly disappointed that none of the WMPC previous concerns have been adequately addressed. Both this and the public response to the project have resulted in the recent WMPC decision to object to the development of SZC at Sizewell.
- 1.3. Following a public consultation event organised by WMPC on 4th September we have processed some 100 submitted responses. These responses gave a majority opinion that the SZC project will result in significant and detrimental impacts. There are particular concerns arising from people living within and around

our Parish and village relating to traffic and visual impacts from the proposed siting of the park and ride site.

- 1.4. In our letter dated 20th March 2019 (Stage 3) we stated that *'Unless a suitable diversion route can be found around Wickham Market the Parish Council will not be able to support the SZC project'*. This matter remains unresolved. The two options currently put forward; removing parking on the High Street or creating a diversion route from the B1078 down Valley Road/Glevering Bridge and Easton Road being both impractical and completely unacceptable for our residents for a number of reasons as previously set out on 20th March. EDF have failed to put forward any other options in Stage 4 to address the significant highway impacts which will be experienced from the siting and size of the southern park and ride site.
- 1.5. With this in mind we urge EDF to work with SCC and investigate securing some parking provision at the Martlesham Park and Ride site. Our neighbouring Parish Council colleagues have reported that the site has spare capacity and we know that SCC have previously considered its closure. Utilising this site could help reduce the number of private vehicles on the A12 north of Martlesham and reduce the parking capacity needed at the southern park and ride site. The use of the SCC facility could secure its future as a key public transport link into Ipswich.
- 1.6. The comments made in our previous response at Stage 3 are still valid and we expect these to be addressed in your future proposals and prior to a DCO submission. We have reiterated some of these comments in this letter.
- 1.7. We continue to have significant concerns that the sea transportation option for the movement of materials including aggregates has been virtually discounted by EDF without adequate justification. Left with the choice between a road-led and a rail-led option we strongly support a rail-led option. The integrated transport option appears to be a way of primarily promoting highway transportation.

2. Wider Issues (see also section 3, Stage 3 letter)

- 2.1. We have stated before that Climate Change is a reality, and this is leading to a rise in sea levels. The UK Committee on Climate Change are estimating sea levels will rise by 1m by the end of the century. There is a lack of detail provided by EDF to both forecast the impacts of Climate Change and provide detail relating to the mitigation which will be needed to reduce the impact and ensure safety. A major concern is Sizewell C's position on the coast and its defences being only 14m above sea level. Should a record storm surge or a seismic event occur in the North Sea then the defences could be over topped and a disaster similar to Fukushima could result.
- 2.2. We have concerns about the stability of the coastline, flooding, and the engineering solutions proposed to ensure the suitability of the site on the Suffolk coastline.

3. Transport: movement of materials (see also section 9, Stage 3 letter)

- 3.1. We do not think that the arguments put forward by EDF justify the removal of the sea-led option for the importation of the bulk of construction materials. However, if the sea-led option is not progressed then we favour a rail led option as this will remove the need for some 150 HGVs to use the roads every day at peak construction. This is essential given the fact that the roads are very near their capacity at present. Even with the rail led strategy it is appreciated that considerable road movement will still be required. We struggled to find any real benefits from the Integrated delivery strategy.
- 3.2. We have concerns regarding the combined impacts of traffic arising from both the construction of the wind farm substation at Friston and other developments in the area.
- 3.3. We are also concerned at the increase in traffic shown by the EDF modelling before Sizewell C commences. The consultation states that this takes into account housing growth between 2015 and 2027. The three locations where measurements were taken in Wickham Market, shown in table 4.2, are O, AC and AD and they are predicted to increase by 61%, 48% and 44% respectively which is the 1st, 3rd and 4th highest of the 31 locations where the average growth was 24%. In addition, location P in Hacheston is only forecast to rise by 9% despite a significant increase in the number of houses in Framlingham since 2015.
- 3.4. We do not believe that EDF have robust traffic data for Wickham Market. There are some results which do not appear to be consistent with the more recent traffic monitoring that the WMPC Traffic and Parking Working Group (T&P WG) have carried out in Wickham Market. The EDF figure which best estimates the current traffic flow on the High Street between Border Cot Lane junction and Rackham's bridge is the one for Location AC in Table 4.2. This shows daily vehicle movement of 3650 vehicles and this has not changed since Stage 3. Our measurements indicate that this EDF figure is 1000 movements a day short of the actual traffic movements.
- 3.5. The current volume of traffic at location O given by EDF at Stages 3 and 4 is 3850, this less than the stated volume of traffic at location O at Stage 2 which was 4150. This is confusing as the EDF prognosis is that traffic volumes will rise significantly in Wickham Market prior to the start of the project. The forecast increase in traffic at this location due to project traffic is 1050 for both rail-led and road-led strategies, but for the integrated strategy the increase is only 1000. Surely the rail-led option will take more traffic off the roads? These discrepancies do not inspire confidence!
- 3.6. It is understood that EDF have carried out further traffic monitoring in Wickham Market since Stage 3, yet none of the traffic volume figures have been updated.
- 3.7. The Wickham Market T&P WG have carried out traffic monitoring using a Mini Speed Indicating Device (SID) to consider current highway safety on the High Street. This work has confirmed concerns about the safety of pedestrians at various points including the school bus stop opposite Spring Lane. The High Street in the vicinity of Border Cot Lane is also dangerous with cars travelling at speed in

the centre of the highway due to parked cars on both sides of the road. Additional large volumes of vehicles will merely exacerbate these problems.

- 3.8. The B1078 is a designated HGV route for HGVs wishing to access towns and farms north of the A12. In addition, as a rural area, many tractors towing trailers or farm equipment, combine harvesters and sugar beet lorries use this route at certain times of the year. The size of these vehicles in Wickham Market's narrow streets is a major factor in highway safety problems.

4. Southern Park and Ride (see also section 15.3 Stage 3 letter)

- 4.1. WMPC still have significant concerns relating to the proposed Southern Park and Ride site. The location is situated between two Special Landscape Areas and close to the Marlesford Conservation Area in a prominent location. EDF's current proposals still do not provide sufficient information to show that they have addressed the landscape, light pollution and visual impacts adequately.
- 4.2. There are considerable further opportunities to enhance the wider landscape and to endeavour to mitigate the landscape and visual impacts which will arise. This matter needs to be identified through the Landscape and Visual Impact Assessment process (LVIA) and reflected in the full design prior to the DCO submission. The LVIA process must take into account the possible loss of ash through the presence of ash dieback in the woodlands. A thorough assessment and well-designed scheme could secure more effective mitigation than that currently proposed. In addition, it should secure a long-term legacy of landscape improvements (with hedges, trees and woodlands) secured within the area to remain following removal of the facility and the final restoration works.
- 4.3. WMPC have met with our neighbouring Parish Councils in considering this proposed site. Whilst we are pleased that the design has evolved (since our Stage 2 comments) to secure the retention of the whole of the L shaped Whin Belt, the details of development close to its perimeters and suitable protective buffer zones are still somewhat unclear. The reason for the inclusion of part of Whin Belt within the DCO red line is unclear and clarification is requested. The crossing point for the road across the green lane also remains unclear in terms of impacts on the bridleway, hedgerows, ancient hazel coppice stools and the mature oak.
- 4.4. The close/immediate proximity of the western boundary of the site area to the field edge, bridleway and smaller section of woodland (in the north-west site corner) is of concern. There is no scope for adequate mitigation or protection of the woodland. We note that the bridleway that runs through this woodland (as shown on the definitive map) is not shown correctly on the EDF coloured aerial map. We expect that further detail be provided on detailed drawn plans and provide suitable buffer zones.
- 4.5. We urge EDF to incorporate the following elements in the next stage and/or the detailed design proposals:

- Reduction in size and capacity of the park and ride site;
- Provision of woodland buffer zones of between 15 - 20 metres;
- Securing the positive management of the existing woodlands abutting the site;
- Accurate detailing relating to the highway crossing of the bridleway and details of full restoration;
- Public right of way improvements where the bridleway and footpath abut the site area including a suitable link between them running parallel to the A12. This was indicated at Stage 1 and 2 but subsequently removed from the plan. There is further opportunity to enhance the linkages to the public rights of way to the east of the A12 and provide proper provision for these routes;
- Provision of new hedgerows and/or woodland planting on all site boundaries (including the cross field northern boundary) where there is no existing vegetation. This should be advance planting and will help to provide screening and habitat linkages.
- Provision/addition of new hedgerow trees in advance where there are already hedgerows (as on the east boundaries);
- Space provided for suitable landscape mitigation (as above) and mounding on the west boundary where there are open views towards the site from the public bridleway;
- We support the provision of soiled mounds to provide visual mitigation, we await further detail as to height and profiles;
- Wider landscape enhancement of the B1078 from the roundabout to the site.
- New footway and cycleway provision to the site;
- We support the inclusion of surface water drainage and open swale feature but expect to see more detail of this at the appropriate time.
- All buildings, structures, boundaries, lighting and CCTV to be designed to the highest standards and mitigated in terms of visual impacts.

4.6. We would expect to see support for local/East Anglian nurseries in order to commence early propagation of local provenance plant species in the quantities needed to support this development.

5. Traffic details for proposed park and ride site

We refer you to our comments in the Stage 3 letter dated 20th March 2019 as these are still valid.

6. Wickham Market Mitigation Measures

As there are no new proposals for Wickham Market traffic mitigation between Stage 3 and Stage 4 the detailed comments made in our Stage 3 response letter, explaining why we do not think either option is acceptable, remain extant. We are concerned that EDF's mitigation proposals for the High Street are essentially concerned with improving traffic flow with little if any mitigation for residents along the High Street.

7. Consultation process

7.1. 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.

A handwritten signature in black ink, appearing to read 'R J J', enclosed within a large, loopy oval shape.

R J Jenkinson
Chairman
Wickham Market Parish Council

Copy to:

Suffolk County Council
Cllr Richard Smith SCC
Cllr Alexander Nicoll SCC
Bryn Griffiths
Michael Mol

East Suffolk Council
Cllr Carol Poulter ESC
Philip Ridley