

WICKHAM MARKET PARISH COUNCIL



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To: Gail Boyle
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Major Casework Directorate
Temple Quay House
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Your Ref: EN010012-000670
Our Ref: WMPC-SZC Response Final-2019.06.20-PINS ES Scoping Consultation

20th June 2019

Dear Madam

Wickham Market Parish Council Sizewell C Response:
PINS Scoping Consultation for proposed Environmental Statement submission

Thank you for your consultation letter dated 23rd May 2019. In addition to this response we attach the WMPC response letter dated 20th March 2019 to Stage 3 of the EDF consultation.

We have the following overarching concerns regarding this consultation:

1. EDF is seeking a Scoping Opinion within a short time frame after the close of Stage 3 consultation, its proposals to conduct Environmental Impact Assessments appear to be based on the plans presented during that consultation. As an example Wickham Market PC expressed concerns relating to the inadequate resolution of traffic issues relating to the park and ride site in Hacheston; the proposed increase in its size and issues relating to design and lack of a lasting landscape strategy/scheme. The plan contained in Figure 3.9 has not been amended and therefore does not address matters raised in the WMPC response to Consultation Stage 3.
2. Given that EDF has not addressed the substantive responses to Stage 3 proposals made by statutory consultees and others, we consider that by seeking a Scoping Opinion at this time EDF is totally undermining an effective consultation process.
3. We would certainly expect EDF to consider amendments to the proposed southern park and ride site in light of the substantive comments made by WMPC to EDF at Stage 3 and in our letter dated 20th March 2019.

4. The Parish Councils have been given very little time to respond to this lengthy document, we consider this to be unreasonable given the significant issues raised by the documentation and the magnitude of the proposed development.

WMPC have focussed its response on elements which directly impact on this and our neighbouring Parishes, however we note and have concern regarding various amendments which are likely to exacerbate the environmental impacts associated with the development. These being:

Removal of the bridge option to provide access to the main development site from the north proposed to be replaced with a causeway/culvert and likely to increase environmental impacts.

Overhead lines are proposed to connect the new 400kV substation to the National Grid rather than underground cables, likely to increase urbanising visual impacts.

Planning applications for proposals recently submitted to ESDC in advance of the DCO for the Sizewell B relocated facilities; these involve removal of important landscape features/woodland and indicate a cavalier approach to the cumulative environmental, landscape and visual impacts arising from the totality of the development.

The removal of any marine-led strategy for the movement of construction materials.

TRANSPORT IMPACTS

The EIA scoping report; Page 23 Para 3.2.13 states:

'The descriptions of rail route options and road improvements provided in paragraphs 3.3.2 to 3.3.7 of the 2014 EIA Scoping Report have been revised. The elements described within these paragraphs are either no longer proposed or have been altered. The transport strategy now consists of two alternative freight management strategies: a rail-led and a road-led strategy.'

There is still no clear direction on the rail led option and the WMPC are concerned that a road-led option will create unacceptable highway traffic impacts. We reiterate the contents of our letter to EDF March 2019 which stated the following:

'Assuming the sea led option is not being considered further then the choice is between a road led and a rail led transport strategy, in that case Wickham Market Parish Council strongly favour the rail led option. This option will remove about 150 HGVs off the roads every day at peak construction, which 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. It should also be noted that we still prefer the rail-led option even though the trains travelling at night will be heard in Wickham Market.'

'Our major concern still relates to traffic as the current road network will struggle to cope with any increase. It is of deep concern that the Stage 3 consultation shows clearly that EDF have no confidence in Network Rail completing the required infrastructure work for a rail-led transport option on time. The project is of such importance that, with government assistance, Network Rail should allocate sufficient priority to the works to ensure timely completion.'

'The lack of traffic management for vehicles under 3.5T gives these vehicles free rein to travel on the route most convenient to them. With the significant increase in traffic this significantly increases the chance of "rat-runs" being created which destroys the character of Suffolk's country lanes.'

We expect to see all transport impacts relating to the project to be fully assessed with extensive mitigation proposals, including funding and improvements to public transport and EDF transport schemes, formulated. We have previously suggested that smaller park and ride sites be located along the major road links on brown field and/or developed sites (such as Martlesham park and ride site) and recommend that this option is considered further.

LOCAL TRANSPORT IMPACTS

The EIA scoping reports: Page 35 Para 3.4.2 states:

'The temporary park and ride facilities would be constructed to reduce the amount of additional traffic generated by the construction workforce on local roads and through local villages.'

We consider that the approach for one large southern site located at Hacheston will increase traffic travelling through local towns and villages on the main traffic routes from the south, west and east. The proposed diversion route for traffic to the west of this village is not suitable and cannot be supported by WMPC.

Both the diversion route and the wider traffic impacts will need to be fully assessed and with mitigating measures provided. These might include improvements to public bus transport on the road routes (B1116, B1078) and proposals for EDF bus transport to the park and ride site thus reducing car use.

The traffic impacts on the B1078 roundabout will need to be fully assessed, we currently consider there will be significant impacts on the traffic movements at this junction.

We have previously expressed concern regarding the methodology relating to traffic modelling and expect this to be taken into account within the EIA process. All cumulative impacts on our local roads from both existing and proposed traffic use will need to be assessed.

HACHESTON PARK AND RIDE SITE

We note the description given in para 3.4.6 of the scoping report in addition to the plans at Figures 3.9 and 3.10. These have not been updated since Consultation 3, WMPC are therefore disappointed about the lack of refinement to the design and mitigation proposed.

There must be a good footpath and cycle routes from Wickham Market to the Park and Ride, these should be included and assessed with the ES. The proposal to include a mere 20 cycle parking spaces appear to be insufficient. Rights of way should be protected and given wide buffer zones and safe crossing points to proposed access points.

The Southern Park and Ride is situated between two Special Landscape Areas (as currently designated) and close to the Marlesford Conservation Area in a prominent location. The ecological, landscape and visual impacts will need to be fully assessed with subsequent design measures including both on and off site landscape/ecological mitigation and enhancement measures provided.

With respect to visual impacts the proposed study area of 2km may need to be extended to ensure full assessment from Marlesford Conservation area, public viewpoints and properties at Campsea Ashe, Hacheston, Wickham Market and Marlesford, Marlesford and Glevering historic parklands (local designated) and public rights of way. Night time lighting/sky glow will need to be considered and assessed. There may be cumulative impacts with the current intrusive lighting at the five ways roundabout, suitable design measures and mitigation of impacts will need to be employed.

We remain concerned at the loss of part of the woodland, Whin Belt, the green lane/footpath and its associated ancient tree, this is skyline vegetation currently offering natural landscape mitigation to the proposed site. Detailed assessment should reveal the need for significant design amendments to be made prior to the ES/DCO being finalised.

There are opportunities to enhance the wider landscape which have to date not been adequately considered or embedded into the scheme design. The approach to the northern park and ride site follows appears to follow similar principles. The proposals to shield these large highly visible 'urban' sites by bunding alone is in the opinion of WMPC unacceptable. If wider boundary landscape enhancements were achieved a long-term legacy of landscape improvements (hedges, trees and woodlands) within the area could remain in perpetuity.

The impacts of all buildings and ancillary facilities, signage and lighting will need to be assessed. Viewpoints should be agreed with the LPA. We would expect all buildings to be low level and designed to suit this rural location.

We have noted the references to a Landscape Strategy in both the scoping report and the 2014 documentation. We consider that such a strategy should outline long term enhancement and management measures and should be both included and secured (via appropriate legal agreements and bonds) for all the Off-site developments including the northern and southern park and ride sites.

With respect to Page 37, Para 3.4.11 the construction programme should also include phases relating to critical mitigating elements:

- Advance planting;
- Ecological mitigation measures;
- Ecological habitat enhancement measures;
- Management of the above elements;
- Long term retention and management of the above after 'removal and reinstatement' of the car park and arable field.

WICKHAM MARKET DIVERSION ROUTE

We note the proposals outlined on page 43, Para 3.6.15 to 3.6.18.

We have previously outlined the following concerns:

'The junction of Easton Rd and the B1116 is very poor. The suggested improvements are fully supported.

The section of road from Easton Rd to Glevering Bridge is a flood plain which can be flooded for extended periods.

Glevering Bridge is a single-track listed humpback bridge. It is narrow, has a weight limit of 10T and visibility is poor making it difficult to see if vehicles are approaching. This bridge is damaged fairly regularly resulting in closure.

The EDF proposal suggests widening and re-aligning the stretch of road from Glevering Bridge to the B1078. These suggested improvements should make the road two way, but the number of corners will not make it an easy road to drive.

There is a 25m pistol range close to the proposed diversion route at the junction just east of Glevering Bridge. The proposed road improvements seem to impinge on the danger area!

The section of road past Valley Farm is well used by horses from the Valley Farm Riding Centre.

The junction where the diversion joins the B1078 is very dangerous. It is in a dip and vehicles coming from the Wickham Market direction will have very little time to stop should a vehicle be exiting or turning in to this junction.

It must be remembered that drivers will only use the proposed diversion route if it is easier. This proposed route is significantly more difficult to drive.'

The impacts arising from the current proposed diversion route will need to be fully assessed and designed with appropriate mitigation in terms of highway safety, ease/attractiveness of use (to avoid traffic issues in WM), ecological and landscape impacts.

The highways works will involve removing the deeply banked and hedged cutting of Valley Road which will require detailed landscape and ecological assessment. Measures to reinstate the road after use should be included in the ES.

These proposals will not address the desire by many to travel through the village centre, along the High Street and through the many smaller roads in the vicinity. Measures to improve the public transport system and the EDF bus transport links will need to be encapsulated within the ES in order to ensure highway impacts are minimised.

We continue to share the concerns of many other parties that EDF are not proposing to carry out a further 4th stage of consultation before submission of the Development Consent Order to the Planning Inspectorate.

However we welcome the opportunity to comment on the ES Scoping consultation and hope that the points raised with respect to some specific elements of the project will assist positively with amended designs and proposals prior to the preparation of the Environmental Statement.

Regards,

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

Cc MP Mr D Poulter
Cc District Councillor Ms C Poulter
Cc Sizewell C Team ESDC sizewellc@eastsoffolk.gov.uk