

WICKHAM MARKET PARISH COUNCIL



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Our Ref: WMPC/SWG Response to EDF SZC Stage 5

18th December 2020

Dear Sir/Madam

Wickham Market Parish Council Sizewell Working Group Response to EDF SZC Stage 5 Post DCO submission consultation

Please note this is our formal response to EDF regarding Stage 5 consultation in respect to the proposed Sizewell C power station. We submitted comments to EDF on 20th September 2019 in relation to Stage 4. Our Relevant Representation was submitted to PINS on 21st September 2020 and can be found on the WMPC web site.

We have considered the key aspects of Stage 5 consultation and comment on those changes which affect Wickham Market and some additional points where we have concerns.

We understand that these proposals follow on from EDF's engagement with stakeholders, the public and local authorities, however we question why it has taken so long for EDF to consider introducing these changes in response to the concerns which have been expressed for some considerable time.

1. Increase in the frequency of freight train movements to facilitate bulk material imports by rail. We tentatively support any reduction in HGV movements on the A12 as being beneficial to the Wickham Market area and impacts on the A12 however we are aware that the extra rail freight movements could adversely impact other people/users including residents living near the line. Any additional rail use is still dependant on Network rail agreement. We have yet to see evidence that the stated number of 300 fewer HGV's will be deliverable.

2. Enhancement of the permanent beach landing facility and options for a new temporary beach landing facility to facilitate material imports by sea.

We understand that feasibility studies are still being undertaken to explore the viability of a longer permanent BLF and a new temporary one. These studies should have been done many years ago, but we were led to believe the options were not feasible. It will be important to understand whether the importation of materials by sea is feasible without damage to the ecological environment before tentative support could be given.

3. Change to the SSSI crossing design to a single span bridge with embankments.

This change must be beneficial, and the statutory agencies have advised on this approach previously. However, the introduction of a permanent road across the SSSI to the SZC site including

car parking, lighting and ancillary structures in the area will create detrimental adverse environmental impacts on this delicate ecosystem.

4. Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall.

WMPC are not in a position to provide comment

5. Change to the sea defence to make the scheme more efficient and resilient to climate change.

We cannot understand why the necessary engineering solutions were not been put forward at Stage 1. It would appear that the vulnerable coastal location and sea level rise have not been sufficiently considered previously. We are aware that many statutory authorities have significant technical concerns regarding coastal stability and solutions. We expect all necessary technical work and measures to be put in place to prevent a coastal and environmental disaster from occurring in future.

6. Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field.

We cannot support any development or planting on the Pill Box field. This is a totally inappropriate use of land within the AONB and will have a wider and cumulative detrimental impact on top of proposals to build various substantial structures on the land of Coronation Wood. We consider that the premature felling, without the necessary permits, of this mature mixed woodland, some 110 years old shows a cavalier approach to the environment of SZA, B and C. If SZC does not proceed the relocation of facilities should not be necessary.

7. Change to certain parameter heights and activities on the main development site to facilitate the construction process.

The possibility of changes creating further detrimental impacts within the area must be considered with care. We are already aware of the significant and harmful impacts which will occur should the relocated SZB facilities take place following the decimation of Coronation Wood.

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8. Change to the location of the Water Resource Storage Area and the addition of flood mitigation measures to lower flood risk.

WMPC are not in a position to provide comment

9. Revisions to tree retention on the main development site.

WMPC are not able to provide comment

10. A new bridleway link between Aldhurst Farm and Kenton Hills.

WMPC are not in a position to provide comment

11. Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss.

Creation of fen meadow habitat in another part of Suffolk is not a satisfactory mitigation for habitat loss on the Suffolk Coast. This does not create biodiversity net gain.

12. Extension and reduction of the Order Limits for works on the main development site and related sites (fen meadow mitigation sites and marsh harrier improvement sites).

As for item 11.

13. Reinstatement of the 3m bund and other minor changes at the Southern Park and Ride site, including a minor reduction of the Order Limits.

WMPC raised the observation that the length of bund on the north west boundary to the SP&R site had been reduced in the DCO documentation. This was a change to the scheme proposed at Stages 1, 2, 3 and 4 for no apparent reason and with no justification in the LVIA. It is not clear why the bund

was removed at DCO submission stage. We are pleased that it has been re-instated, however other concerns regarding the limited impact assessment and a lack of landscape mitigation measures including long-term legacy of planting have not been addressed. We will continue to press for further improvements including those needed to deal with the harmful and significant impact of lighting.

We note in the paragraph 5.2.11 EDF have referred to other minor design changes, which are being explored. We look forward to seeing the result of these considerations and some significant detail relating to the scheme and its impacts.

With respect to the DCO order limits we have previously suggested that this be broadened to ensure sufficient space for landscape mitigation and enhancement of the site access road. This part of the site and the park and ride beyond will be very visible from WM in public views that have **not been assessed** within the LVIA.

14. Minor reductions to the Order Limits at the Northern Park and Ride site.

WMPC are not in a position to provide comment

15. Extension of the Order Limits for works on the Two Village Bypass, change to the public right of way around Walk Barn Farm and additional habitat mitigation proposals.

WMPC are not in a position to provide comment

16. Extension to and reduction of the Order Limits for works on the Sizewell Link Road.

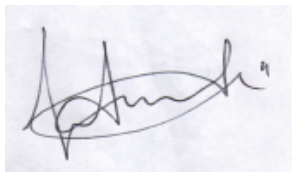
WMPC are not in a position to provide comment

17. Minor reductions to the Order Limits for Yoxford Roundabout, the A12/B1119 junction at Saxmundham and the A1094/B1069 south of Knodishall.

WMPC are not able to provide detailed comment on proposal however we have noted that with respect to the further document and at junction A12/B1119 there are several trees including a large pollarded field maple on the north side of the junction which we would hope will be retained and protected.

Summary

In relation to the statement made by EDF in the Stage 4 consultation documents regarding liaison with the WMPC Neighbourhood Plan committee, a line of communication relating to traffic mitigation was subsequently established and meetings have taken place since December 2019. As a result of this EDF have begun to consider some potential traffic measures for the village. We anticipate some specific proposals which the public can be consulted on in the early part of 2021. We will also continue to press for additional significant design and landscape mitigation measures for the SP&R site itself. We do not believe that the changes in this Stage 5 consultation will reduce the many negative impacts of increased traffic numbers travelling through the village to and from the SP&R.



Ivor French
Chairman Wickham Market Parish Council

Cc Cllr A Nicol
Cc Cllr C Poulter