

Comments on the *Deadline 1* Joint Local Impact Report (LIR) from East Suffolk Council / Suffolk County Council - for MPC's *Deadline 3*, Thursday 24 June 2021.

Glossary of Acronyms

MPC	Melton Parish Council
SZC	Sizewell C
LIR	Joint Local Impact Report (Transport and Traffic)
ExA	Examining Authority
SCC	Suffolk County Council
ESC	East Suffolk Council

1. MPC's key point is that the LIR for Traffic & Transport does not give sufficient recognition to the fact that the A1152 / B1069 corridor from Melton to Leiston is a significant alternative to the A12 for traffic between Ipswich and Leiston. Consequently, there is a risk that highway mitigation work on the A1152 will not get the priority it deserves.
2. For the many drivers who prefer to avoid the A12, the A1152 through Melton is the route of first choice for destinations east of the parish and as far north as Leiston.
3. Our contention is that SZC and the Scottish Power projects would exacerbate the already bad traffic problems on the A1152.
4. The LIR lends support to this view when stating:
 - *"This traffic will also reduce capacity at busy junctions along the A12, notably at the A1152 junction at Melton";*
 - *"increased unrestricted construction traffic LGVs and cars and displacement traffic of cars avoiding the A12 may lead to additional strain on other roads, including minor roads, near the A12, such as the B1069 / A1152".*
5. In addition to traffic "*displaced*" from the A12 to the A1152 there will be the impact of the expected explosion of rat-running through Martlesham, Woodbridge and within Melton (on Yarmouth Road, Saddlemakers Lane and Station Road); all converging at the A1152 in the centre of Melton village, then heading over the Wilford Bridge for destinations east of the A12.
6. We also expect SZC and the Scottish Power projects to increase the volume of locally-generated commercial traffic on the A1152 from the many nearby businesses providing goods and services to the construction site. The Deben Peninsula holds many such firms, the largest group of which is located at the Bentwaters Business Park on the A1152. The latter is a dynamic and successful commercial centre which is believed to have contributed to the traffic increase on the A1152 in recent years. It is likely that traffic from the Business Park would continue to grow, even without SZC. If SZC does go ahead, there would be extra HGV traffic

from the probable increased use of Bentwaters Business Park for off-site offices and stores etc. and providing various goods and services to SZC.

7. The A12 and the rest of the local road network lack resilience. Under the procedures within the Traffic Incident Management Plan (TIMP), it will not be an uncommon event for the A1152 / B1069 corridor to be used as a diversion route when the A12, or other roads off the A12, are blocked.
8. The LIR’s Annex M (Transport Related Mitigation, Requirements and Obligations) contains four Tables, each representing a different level of commitment to SZC-related highway mitigation schemes – summarised below with details in the APPENDIX:
 - Table 1, list of highway mitigation schemes that are being progressed with the Applicant
 - Table 2, list of highway schemes where the councils feel that additional mitigation is required
 - Table 3, list of “potential” additional highway mitigation required
 - Table 4, other highways related issues that may require mitigation.
9. The “A1152 and B1069 corridor running from A12 Melton to Leiston” is in the Table 3 list of “potential” schemes for mitigation, see the extract below.

Location	Summary of required improvements
A1152 and B1069 corridor running from A12 Melton to Leiston	Road safety improvements and enhancements for vulnerable road users and road traffic on the A1152 and B1069 corridor running from Melton/Woodbridge to Leiston, particularly at Knodishall, Snape, Tunstall, Rendlesham and Melton to address unforeseen impacts of worker traffic on rural roads and communities.

10. With regard to the Table 3 listing for the A1152 / B1069 corridor, MPC contends that the statement “to address unforeseen impacts of worker traffic on rural roads” is a wholly inadequate criterion for measuring the adverse impact of SZC-related traffic on this route, as described in the preceding paragraphs.
11. It bears repeating that the recent multiple business and housing developments in this part of Suffolk have had a cumulative adverse traffic impact on the local community but the incremental approach of the statutory planning process has delivered next to no capacity upgrade to the highway network.
12. Given the local community’s real-world experience of traffic on the A1152, together with the evidence in our Written Representation and earlier submissions, MPC is very surprised and disappointed that the highway mitigation plans for the A1152 / B1069 are not more substantial and not positioned in Table 2 rather than Table 3.
13. MPC’s Written Representation contains the following statement of urgently needed highway ameliorations:

- an intervention to cut the volume of traffic on the A1152 passing through Melton to access the A12.
- the dog-legged level crossing at Melton Station to be upgraded and straightened out;
- an improvement to the physical highway to relieve the serious traffic congestion at the Melton crossroads traffic lights, next to our Primary School.

14. MPC welcomes the proposal by SCC/ESC for a contingency fund to be established “*of sufficient value to monitor, respond to and mitigate numerous transport impacts*”. If measures were to go forward based on monitoring (some of the locations listed in Table 3), the funds would be drawn down from a Transport Contingency Fund, as deemed appropriate by the Transport Review Group.

15. MPC, therefore, asks the ExA to require SCC/ESC to:

- change their criteria for mitigation work on the A1152 / B1069 corridor to cover the significant adverse impacts of SZC-related traffic on this route, as described in this submission;
- upgrade the priority of A1152 / B1069 projects and position them in Table 2;
- have regard to the urgently needed highway ameliorations identified in MPC’s Written Representation;
- provide assurance that the contingency fund will, indeed, be created and be of “*sufficient value*”.

Melton Parish Council
24 June 2021

The SCC/ESC LIR, Annex M (Transport Related Mitigation, Requirements and Obligations) contains four Tables, each representing a different level of commitment to SZC-related highway mitigation schemes

Table 1. Transport related schemes the Councils are currently pursuing with the Applicant. (Please note: other locations/improvements may be added to this list if further evidence evolves)	
Location	Summary of required improvements
Leiston town improvements	Including town centre mitigation and cycle improvement strategy, to be delivered in the Early Years of construction. The design of these works should include traffic assessments during the operational phase.
B1122 Corridor	Changes to the B1122 bypassed by the SLR (if permanent) to a local access road prioritised for cycling, walking and equestrian use
Wickham Market mitigation scheme	Including road safety improvements on B1078, High Street mitigation and town improvements; to be delivered in the Early Years of construction prior to opening of the southern Park and Ride site.
B1078/B1079 road safety improvements	Improvements to be delivered in the Early Years of construction prior to opening of the southern Park and Ride site, to include: <ul style="list-style-type: none"> i. Improvements at and around Coddendam. ii. Speed limit changes at Charsfield iii. Improvements at the B1078 / B1079 junction at Otley, as proposed by the Applicant. iv. Potential road safety improvements at the B1078/B1079 junction at Clopton. v. Improvements at the A140 / B1078 junction as proposed by the Applicant. vi. Road safety improvements at the B1078 / Main Road junction at Hemingstone. vii. Road safety improvements at the B1078/ Ashbocking Road junction (Hare and Hounds Corner)

Table 2. Additional highway mitigation required (Please note: This list is subject to review if further evidence evolves)	
Location	Summary of required improvements
Eastbridge Lane	Safe pedestrian facilities between the north end of BW19 and Eastbridge (further detail in the PROW section of the LIR).
B1122 corridor	<p>Mitigation of the early years traffic severance and anxiety impacts on the communities of Theberton and Middleton. Improvements to cycling and walking infrastructure beyond the limits of the Sizewell Link Road.</p> <p>B1122 corridor: Improvements for cyclists and pedestrians to be delivered prior to peak construction to provide an attractive alternate route for vulnerable highway users. This includes provision of infrastructure beyond the limits of the SLR site to avoid access to Yoxford and Leiston being severed by the lack of footways or cycleways along those parts of the B1122 that will remain as highly used access routes to SZC.</p>
B1125 corridor	Proportionate highway improvements for vulnerable road users arising through severance particularly, but not exclusively, in Middleton, Westleton and Blythburgh to mitigate Early and Peak Years impacts associated with increased construction workforce movements.
Yoxford (A12)	Proportionate highway improvements or relevant controls on HGV movements to mitigate cumulative impacts, specifically on vulnerable road users, with East Anglia One North or East Anglia Two.
Little Glemham (A12)	Proportionate highway improvements in the form of footway improvements including improved crossing facilities, gateway features to influence driver speed, resurfacing, to mitigate impacts on vulnerable road users, fear and intimidation, and road safety. Dependent on the final assessment of noise and vibration lower noise surfacing may be required. Depending on the proposals, elements of the highway improvements may mitigate impacts for both Little Glemham and Marlesford.
Marlesford (A12)	Proportionate highway improvements in the form of footway improvements including improved crossing facilities, gateway features to influence driver speed, resurfacing, to mitigate impacts on vulnerable road users, fear and intimidation and road safety. Dependant on the final assessment of noise and vibration lower noise surfacing may be required. Depending on the proposals, elements of the highway improvements may mitigate impacts for both Little Glemham and Marlesford.
A12 corridor between A14 Seven Hills and A1152 Woods Lane	SCC as local Highway Authority expects a financial contribution towards improvements to mitigate impacts on capacity, economic impacts of congestion particularly as a result of increased journey time, impacts on fear and intimidation and road safety.

Table 3. Potential additional highway mitigation required (depending on further evidence and/or based on monitoring; other locations may be added to this list if further evidence evolves)	
Location	Summary of required improvements
B1122 corridor	Road safety improvements and enhancements for vulnerable road users particularly those using minor roads and rights of way adjacent to the B1122 e.g. at Kelsale. Controls or mitigation to address unforeseen impacts of worker traffic on rural roads within the surrounding communities.
B1121 / B1119 Saxmundham town centre signal junction	Capacity and pedestrian improvements at the B1121 / B1119 Saxmundham town centre signal junction.
Junctions on A12 from Yoxford to Lowestoft	Road safety improvements if construction traffic adversely impacts on users at junctions, for example at Blythburgh the A12/B1125, A12/A145 and A12/A1095; and the A12/B1126 at Wangford.
Bredfield junction (A12)	Road safety improvements if additional construction traffic on the A12 adversely impacts on users of the joining minor roads.
A1120 corridor	Road safety improvements and enhancements for vulnerable road users on the A1120 corridor, particularly at Yoxford, Badingham, Earl Soham and Pettaugh to address unforeseen impacts of worker traffic on rural roads and communities.
A1152 and B1069 corridor running from A12 Melton to Leiston	Road safety improvements and enhancements for vulnerable road users and road traffic on the A1152 and B1069 corridor running from Melton/Woodbridge to Leiston, particularly at Knodishall, Snape, Tunstall, Rendlesham and Melton to address unforeseen impacts of worker traffic on rural roads and communities.
A1094 from the A12 to the B1069 at Friston	Road safety improvements along route but specifically at the A1094/B1069 Snape and A1094/B1069 Friston junctions.
Seven Hills (A14)	Road safety improvements and capacity enhancements if movements to the FMF result in impacts exceeding those in the Transport Assessment or ES (in consultation with Highways England)

Table 4. Other highway related issues that may require mitigation	
Issue	Summary of required measures
Site specific highway issues such as fly parking, speeding , disruption of the rights of way network and rat running within local communities	Location specific control or mitigation, as appropriate based on the nature of the impact
Movement of abnormal loads	Abnormal loads will cause delays to other road users. An effective management plan including elements such as timing, waiting areas and protocols on escorting such loads shall be agreed with stakeholders such as Suffolk Constabulary and the highway authorities.
Traffic Management during construction of highway works	Many of the highway mitigation works are themselves likely to create adverse impacts on road users and communities during construction. Cooperation of the Applicant with the highway authorities and other stakeholders is essential so that these impacts are minimised, including those on public rights of way