



## **Deadline 5 Submission**

**Written Representation Regarding Issue Specific Hearing 2&3 Traffic and Transport – 7-8<sup>th</sup> July 2021**

**(Matters relating to A12 Mitigation and Two Village Bypass)**

**On behalf of Marlesford Parish Council**

**Regarding NNB Generation Company (SZC) Limited DCO Application**

**Richard Cooper  
Councillor  
Marlesford Parish Council**

**Melanie Thurston  
Parish Clerk**

**[REDACTED]**

**23rd July 2021**

**Interested Party No.20025903**

**Issue Specific Hearing 2 (ISH2) Traffic and  
Transport (Part 1)  
Date: Wednesday 7 July 2021**

<b>Agenda Item</b>	<b>Issue</b>	<b>Marlesford Comments</b>
<b>2</b>	<b>Freight Management Strategy</b>	
	<ul style="list-style-type: none"> <li>Capacity and delivery of movement of freight by rail</li> </ul>	<ul style="list-style-type: none"> <li>As a general point, Marlesford is not convinced that the Applicant is committed to <u>maximising</u> the transport of construction materials by sea and rail. It has cited a 40:60 split, road to sea/rail as a result of its Change Proposals, but there is no clear commitment that if capacity is available above 60% that it will be used. Only if it is, can HGV numbers be said to be minimised.</li> <li>Marlesford is concerned that whilst the Applicant is obviously engaging with Network Rail, Network Rail themselves have not given any indication that the Change Proposals for an increase in rail freight are achievable. In particular, we are concerned about the timing of the delivery of any increases to rail freight capacity. Amongst other rail proposals, we note the proposals to create sidings so that two trains a day can haul materials to the LEEIE. This could reduce reliance on HGVs in the early years, but it is still unclear how and when these sidings could be delivered. It is therefore difficult to assess the full impact of SZC generated HGV traffic on East Suffolk communities until these uncertainties are clarified. However, Suffolk County Council (SCC) recognise in their Local Impact Report that whatever the eventual outcome of the Applicant's Change Proposals, the impact on the area's roads will be significant and the communities along and around the A12 will be particularly badly affected.</li> <li>We would also be concerned if the Applicant's plans for increased use of rail had an adverse impact (either temporary during construction of new rail infrastructure, or longer term through the life of the project) on the operation of Felixstowe Port which is a vital driver of the East Suffolk economy.</li> </ul>
	<ul style="list-style-type: none"> <li>Movement of freight by sea</li> </ul>	<ul style="list-style-type: none"> <li>Marlesford supports the increased use of marine transport of construction materials, but the benefits in terms of HGV reduction will remain unclear until the Applicant produces its final plans.</li> </ul>
	<ul style="list-style-type: none"> <li>Movement of freight by road</li> </ul>	<ul style="list-style-type: none"> <li>We agree with SCC's view expressed in the Local Impact Report that "Construction traffic HGVs, AILs, buses, cars and LGVs will increase delays across Suffolk's highway network, specifically, along the A12". It is inevitable that the increase in traffic on this strategic corridor will lead to</li> </ul>

		<p>delays – particularly during the construction of associated development. We believe that the delays will lead to driver frustration and that drivers are likely to take risks in order to overtake on unsafe stretches of road. There is therefore the likelihood of an increase in road traffic accidents and the delays being further compounded. Impacts on the resilience of the A12 as the main north-south corridor in East Suffolk are likely to have an adverse effect on the local economy.</p> <ul style="list-style-type: none"> <li>Marlesford is very concerned about its minor roads (and businesses) that access onto the A12. The increase in construction traffic along the A12 will reduce the ability of local drivers to turn onto the A12 (particularly those attempting to turn right). This will not only add to driver frustration, and the possibility of risk taking, but it is also likely to contribute to “rat-running” on minor roads which avoid the A12. SCC and EDF need to be more proactive in anticipating this problem – it is acknowledged by SCC that “rat-running” will happen, but we consider that it is not good enough to leave the issue until it becomes an aggravation to local communities and then address it through the Transport Review Group.</li> </ul>
	<ul style="list-style-type: none"> <li>Movement of freight by Abnormal Indivisible Loads (AIL)</li> </ul>	<ul style="list-style-type: none"> <li>We understand that the Applicant expects to bring some loads of under 150t by road. Loads over 150t are expected to be brought by sea or use the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell. The Applicant has therefore concluded that “structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project”. But we would draw to the attention of the Applicant that in discussions with Scottish Power Renewables regarding their AIL requirements for EA1-N and EA2, there has been some debate about the future availability of the Belvedere Yard at Lowestoft. Marlesford therefore believes that the Applicant should have a contingency road plan should loads have to be brought in from the south. Scottish Power have said that if Marlesford Bridge has to be used for AILs, they would lay down a temporary bridge deck.</li> </ul>
<b>3.</b>	<b>Transport Strategy relating to Associated Development Sites</b>	
	<ul style="list-style-type: none"> <li>Two Village Bypass – Implications for possible Four Village Bypass;</li> </ul>	<ul style="list-style-type: none"> <li>A Four Village Bypass (FVB) has been considered necessary for Marlesford, Little Glemham, Stratford St Andrew and Farnham since the late 1980’s.</li> <li>At the planning enquiry in 1995 a route for the FVB was approved.</li> <li>In October 2018, SCC made a bid for funding to Department for Transport which was ultimately unsuccessful <u>but</u> SEGWay (the FVB) which essentially follows the route approved in 1995, remains a strategic objective for SCC.</li> </ul>

		<ul style="list-style-type: none"> <li>• SCC's Local Transport Plan recognises the East Suffolk Coast, including Sizewell C as a key area for growth and development and the FVB is still included as a strategic transport improvement scheme in Part 2 of the County's Local Transport Plan.</li> <li>• The Local Transport Plan recognises that there are long-standing traffic volume issues affecting Marlesford, Little Glemham, Stratford St Andrew, and Farnham. It is therefore bitterly disappointing for Marlesford and Little Glemham that SCC have failed to make a strong enough case for the FVB and central government have been unwilling to fund it, despite SCC recognising that the FVB is the "optimal solution". We see this as a huge, missed opportunity to leverage the Applicant's contribution to the Two Village Bypass (TVB) in order to reduce the impact on the public purse. We are convinced that any later "retro-fit" of a bypass for Marlesford and Little Glemham will have a high cost and for that reason, it will not be built.</li> <li>• It is well accepted by the local authorities that traffic traveling through Marlesford and Little Glemham will significantly increase severance, pedestrian delay, anxiety of pedestrians, cyclists and other vulnerable road users, and increase the potential for conflict between large vehicles and vulnerable road users. The completion of the TVB is likely to encourage further traffic on the A12, which will itself have further negative impacts on Marlesford and Little Glemham.</li> <li>• Marlesford is supportive of the <u>principle</u> of the TVB of Stratford St Andrew and Farnham, but we believe the Applicant's plans fall short in some important respects: <ul style="list-style-type: none"> <li>○ SCC and East Suffolk Council (ESC) consider that the route proposed by the Applicant is the least, worst option – selecting a least, worst option is not a good principle for sound and sustainable decision making.</li> <li>○ Marlesford and Little Glemham have consistently argued that the alignment the TVB proposed by the Applicant will preclude a future connection with a bypass of the two villages and this is now confirmed by SCC when they stated in a Deadline 2 submission that, "The Two Village Bypass will in effect preclude the building of the SEGWay four village bypass proposals on the desired alignment as set out in the SEGWay business case, and it does not deliver the full improvements required to address future congestion on the A12 to support the Lowestoft and east Suffolk economy, support the housing development in the Suffolk Coastal Local Plan and the other energy NSIP developments in the area." This bears out our argument that all parties are in danger of missing the opportunity to deliver the <u>optimal</u> solution.</li> <li>○ Marlesford and Little Glemham cannot agree with the statement from the Applicant in the Issue Specific Hearings that the proposed alignment of the TVB will not prejudice the linking of the TVB and a bypass of Marlesford and Little Glemham at a later stage. The cost implications of a "retro fit" based on the currently proposed alignments will almost certainly preclude such a linkage.</li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>○ Using the currently proposed alignment for the TVB, the applicant fails to minimise the impacts on properties at Farnham Hall. We argue, as do our neighbours in Stratford and Farnham that a route to the east of Foxburrow Wood not only affects fewer properties, but also provides a better alignment for an ultimate connection with a bypass of Marlesford and Little Glemham.</li> <li>• We recognise that our neighbours in Stratford St Andrew and Farnham have a problematic stretch of the A12 running through their villages and we are pleased for them that a solution is at hand. In Marlesford and Little Glemham however, we will experience the same volumes of traffic that would have gone through Stratford St Andrew and Farnham.....but without the mitigation and this, on what Inspector Guy Rigby in the EA1-N and EA2 Issue Specific Hearing 13 (Traffic and Transport), described as “the first unimproved section of the A12 after the dual carriageway section [north of Wickham Market].”</li> <li>• We would urge all parties, even at this late stage, to find a way of delivering a FVB, but, if that proves to be impossible (after using best efforts) the minimum that we would accept is a design for the TVB which allows for a technically feasible, least cost connection option for a future bypass of Marlesford and Little Glemham.</li> </ul>
	<ul style="list-style-type: none"> <li>• Freight Management Facility - Alternatives and access arrangements</li> </ul>	No comments.
	<ul style="list-style-type: none"> <li>• Sizewell Link Road – Transport consideration of alternative routes, timing of delivery and legacy benefits</li> </ul>	No comments
	<ul style="list-style-type: none"> <li>• North and South Park and Ride sites – size and modelling coverage</li> </ul>	No comments
<b>4.</b>	<b>Transport Assessments approach and modelling</b>	
	<ul style="list-style-type: none"> <li>• Early years traffic modelling</li> </ul>	No comments
	<ul style="list-style-type: none"> <li>• Seasonal traffic effects</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic on the A12 throughout most of the year can be heavy and create delays for local drivers trying to get on to the A12 particularly if right-turning. East Suffolk is a holiday destination and if its tourist trade can weather the other adverse impacts of the SZC development, all traffic (both local and tourist) is likely to be affected by the associated development on the A12, including</li> </ul>

		<p>“on-line” works to roundabouts and junctions. These works need to be scheduled into the programme early, in order to avoid the increase in SZC traffic (and potentially EA1N and EA2) as the project(s) progress, <u>and</u> they need to be scheduled at times of the year to avoid the heaviest volumes of tourist traffic.</p>
	<ul style="list-style-type: none"> <li>Buses</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the principle of bussing workers into the main construction site, but we are opposed to the Southern Park and Ride in its proposed location. Marlesford insists that <u>all</u> buses used by the Applicant and its contractors should be electric.....the Applicant is, after all, an electricity company.</li> </ul>
	<ul style="list-style-type: none"> <li>Park and Ride sites traffic modelling</li> </ul>	<ul style="list-style-type: none"> <li>Marlesford has great concerns that HGVs serving the planned Southern Park and Ride site are not proposed to be controlled by caps or monitored for route choice. The numbers of HGVs will be significant, and we ask the Applicant to cap and monitor these HGVs in the same way as will be done for HGVs serving the main development site.</li> </ul>

**Issue Specific Hearing 3 (ISH3) Traffic and  
Transport (Part 2)  
Date: Thursday 8 July 2021**

Agenda Item	Topic	Marlesford Comment
2	Transport Assessments approach and modelling (continued from Wednesday if required)	See comments under Part 1 (above)
3.	Monitoring and Control Mechanisms for Traffic and Transport	
	<ul style="list-style-type: none"> <li>Early Years controls in the DCO</li> </ul>	<ul style="list-style-type: none"> <li>A major emerging concern for communities on and served by the A12 is “rat-running”. It is “off the radar” as far as the Applicant is concerned as they regard rat-running as a largely non SZC, local traffic issue and therefore outside their control and they refer to it as “driver choice”. We consider that the plans of the Applicant will inevitably lead to drivers seeking alternative routes to avoid congestion caused by the Applicant’s proposals and whether this is considered to be “driver choice” or “rat-running”, it will lead to intolerable congestion on minor roads in Marlesford and surrounding communities. We feel that SCC are being insufficiently robust in seeking solutions to what could become a major aggravation to local people. SCC seem to accept that rat-running will occur when they say, “SCC considers that it is likely that many workers and local drivers will switch to minor routes ‘rat running’ through local communities.”</li> <li>Marlesford shares the concerns of Campsea Ashe and Snape that the B1078 and B1069 will face particular problems with rat-running – the problem will be compounded if Bentwaters is used as a distribution point for material destined for the SZC development sites.</li> <li>Like our near neighbours in Pettistree we fear that that village will also be used by drivers avoiding congestion on the A12 and in Wickham Market.</li> <li>Experience from Hinkley suggests that rat-running will occur – it is therefore up to the Applicant and SCC to anticipate the problem on <u>our</u> roads, rather than waiting until communities become frustrated by it and solutions have to be found by the Transport Review Group.</li> <li>Parts of the road network in East Suffolk already have low levels of resilience and can be heavily impacted by traffic incidents. Marlesford urges the Applicant to deliver the maximum amount of highways mitigation as early in the construction programme as possible – later delivery risks conflicting with ever increasing SZC, EA1N and EA2 traffic flows.</li> </ul>

	<ul style="list-style-type: none"> <li>Construction Traffic Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>Marlesford has a simple position on engine specification for HGVs serving any of the Applicant's construction sites - it insists that all HGVs should be Euro VI compliant with no percentage minimum as seems to be suggested by the two local authorities. "All Euro VI compliant" and "all electric buses" are the most environmentally sustainable options if the Councils are seeking to minimise air pollutants.</li> <li>Marlesford is concerned about the number of LGVs arriving and leaving the Southern Park and Ride. LGVs visiting the main site will be booked into the Delivery Management System and will presumably therefore be controlled in terms of routes. It is not clear that suitable controls will be in place for LGVs visiting the Postal Consolidation Facility at the Southern Park and Ride. We believe that the technology exists to be able to control these movements and anything that can be done by the Applicant to keep LGVs off minor roads (particularly the B1078 to the west of Wickham Market) should be done.</li> </ul>
	<ul style="list-style-type: none"> <li>Construction Worker Management Plan</li> </ul>	No comment.
	<ul style="list-style-type: none"> <li>Traffic Incident Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>Marlesford has a particular concern that the Traffic Incident Management Area (TIMA) within the Southern Park and Ride should only be used in the event of a genuine incident as agreed by the police via the Traffic Incident Management Plan. The TIMA should only be lit at night when in use for a genuine incident. The area should not be used for <i>ad hoc</i> parking of vehicles with the attendant risk that the area is lit and therefore additionally contributing to the anticipated light spill at night from the Southern Park and Ride.</li> <li>It has been suggested that 100 HGVs could use the Southern Park and Ride in the event of an incident being declared. It is not clear, and we don't believe it has been explained, how this number of vehicles could be accommodated and neither is it clear from the plans for the Southern Park and Ride how HGVs will access the TIMA area.</li> </ul>
	<ul style="list-style-type: none"> <li>Operational Travel Plan</li> </ul>	No Comment
<b>4.</b>	<b>Consideration of local transport impacts</b>	
	<ul style="list-style-type: none"> <li>Difference in proposed mitigations identified in the Transport Assessment and those required by the Councils</li> </ul>	<ul style="list-style-type: none"> <li>Properties adjacent to the A12 in Marlesford and Little Glemham will suffer undoubted adverse impacts from increases in traffic due to SZC, EA1N and EA2. These impacts will come in the form of increases in noise and vibration, and a reduction in air quality. We are asking the Applicant to commit to assembling proper baseline studies in these three areas prior to commencement of construction and agreeing to a programme of monitoring throughout the life of the project. As a minimum mitigation measure against noise (and in addition to the quiet road surfacing that the Applicant has already agreed to) we expect the</li> </ul>



		<p>Applicant to provide double glazing to the fronts of the properties immediately adjacent to the A12. Excessive noise such as that generated by high volumes of traffic, (especially HGVs) is known to be detrimental to mental health, we therefore regard action in this area as being very important.</p> <ul style="list-style-type: none"> <li>• We also expect the Applicant to install appropriate monitoring devices in the same properties to detect the development of structural defects.</li> <li>• As stated above, Marlesford insists that all HGVs should be Euro VI compliant with no percentage minimum as seems to be suggested by the two local authorities. “All Euro VI compliant” and “all electric” buses are the most environmentally sustainable options if the Councils are seeking to minimise air pollutants.</li> <li>• Our overriding concern in Marlesford and Little Glemham is the impact that increases in traffic, as a result of SZC, will have on our residents, particularly those living close to the A12. The Applicant considers that in Marlesford, the effect on fear and intimidation is minor adverse - not significant. We are very pleased to see that SCC and ESC disagree with this assessment. 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. The in-combination effects from all projects are rated moderate adverse, which is a significant effect.</li> <li>• Both Marlesford and Little Glemham are working with the Applicant and SCC to find an acceptable package of mitigation measures for the two villages. Provision of footways, pedestrian crossings, quiet surfacing and speed restrictions have already been discussed. These will need to be refined and improved and both villages expect one signalised pedestrian crossing in each village. Without this we are concerned that those residents who are elderly, have poor eyesight and impaired mobility and younger people with small children will experience high levels of fear and intimidation and community severance (which is already a problem) will increase significantly.</li> <li>• SCC has already said of the TVB through Stratford St Andrew and Farnham that “with the new roads in place, general traffic and Sizewell C traffic will be diverted away from these communities and onto the new roads, which will result in beneficial environmental effects within the communities as a result of the lower traffic flows.” We are delighted that our friends and neighbours in Stratford and Farnham are going to get this relief, <u>but</u> as neighbouring villages to Stratford St Andrew and Farnham and experiencing the same traffic flows as they would if not bypassed, we feel that we are being unjustifiably “left behind” and for no reasonable reason, consigned to suffering the traffic impacts from SZC construction for the next 12 years.</li> <li>• Marlesford and Little Glemham recognises and welcomes their inclusion in the provisions of the Deed of Obligation, but we note the current lack of detail. We will continue to work with the Applicant to arrive at a scheme of mitigation for Marlesford and Little Glemham which addresses all the concerns of the two villages.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Approach to assessment for impacts in Chapter 10 of the Environmental Statement</li> </ul>	No comment
	<ul style="list-style-type: none"> <li>• Consideration of cumulative impact on local roads of the Proposed Development and the Scottish Power applications</li> </ul>	<ul style="list-style-type: none"> <li>• We recognise that Stratford St Andrew is currently in an Air Quality Management Area (AQMA), and it is recognised that there is a risk of significant in-combination air quality impacts from HGVs in Stratford before completion of TVB. Marlesford and Little Glemham believe that there has been insufficient focus on air quality issues within our two villages and whilst Stratford and Farnham will have their air quality issues mitigated, we believe that impacts will shift to Marlesford and Little Glemham.</li> <li>• Marlesford agrees with SCC that the in-combination effects of the SZC and EA1N and EA2 projects make essential the timely mitigation for adverse impacts of road traffic. The in-combination effects from all projects are rated moderate adverse, which is a significant effect.</li> <li>• Marlesford and Little Glemham are also concerned that the increase in construction traffic along the A12 will reduce exit capacity for the large number of side roads and business and private 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 and will inevitably adversely affect businesses operating from premises along the A12, particularly in Marlesford.</li> </ul>

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

**23<sup>rd</sup> July 2021**

