

Deadline 7 Submission

Response to ExA Request for Information Regarding A12 Through Marlesford and Little Glemham

On behalf of Marlesford and Little Glemham Parish Councils

Regarding NNB Generation Company (SZC) Limited DCO Application

**Richard Cooper
Councillor
Marlesford Parish Council**

**Melanie Thurston
Parish Clerk**

Interested Party No.20025903

**Stephen Bayfield
Chair
Little Glemham Parish Council**

3rd September 2021

Background:

On 10th June the ExA made an ASI to the Farnham and Stratford St Andrew area to look at the route of the Two Village Bypass (TVB). Having spent a considerable amount of time in the TVB area, there were then constraints on the time available to look at A12 issues in Marlesford and Little Glemham - despite the fact that this was scheduled for the same ASI. Stephen Bayfield (Chair of Little Glemham Parish Council) and I as the Marlesford Parish Council representative, felt that the ExA were not able, in the time that was available, to properly consider Marlesford's and Little Glemham's issues. We had made reference to some of our concerns in our Deadline 1 Submission – "Comments on Applicant's draft itinerary for ASI and suggested locations for Accompanied site inspections" [REP1-152].

We are pleased that Farnham and Stratford St Andrew are likely to be bypassed if the SZC proposals go ahead, but as the ExA will be well aware, it has long been the objective of all four villages and Suffolk County Council (SCC) to deliver a Four Village Bypass (FVB) (most recently referred to as SEGWay by SCC in its strategic plans). There is now a clear focus on the delivery of the TVB (rather than the FVB), the substantial mitigation for some properties along the route of the TVB and an acknowledgement by SCC and East Suffolk Council (ESC) of the benefits the TVB will bring to the majority of the residents of Farnham and Stratford. This seems to ignore the fact that Marlesford and Little Glemham will still have to contend with the full impact of the SZC traffic and is contributing to the feeling in these two villages that we are being "left behind". **We ask the ExA to note that Marlesford and Little Glemham will be experiencing the same volumes of traffic that would have gone through Stratford and Farnham were they not bypassed.**

In the absence of a FVB (which we will continue to campaign for), we recognise the need to secure as much mitigation as it is feasible to deliver. We should say that we are in discussions with the Applicant and SCC and the various mitigations discussed so far (but not yet formally agreed) are set out under Item 1 in the table below. However good the eventual mitigation is, it will not reduce to an acceptable level, the impact of traffic on those of our residents living close to the A12 and on those businesses on the A12 which rely on their customers having easy access onto and from the A12.

We will be insisting that all mitigation is in place prior to the start of main site and Southern Park and Ride construction.

In the absence of a further ASI, we would ask the ExA to carry out an Unaccompanied Site Visit to Marlesford and Little Glemham and to consider the issues set out below.

1.	Mitigation Discussed to Date	Marlesford and Little Glemham Comments
1a.	Reductions in existing speed limits in Marlesford from 40mph to 30mph.	Broadly welcomed by both villages, however, neither village is satisfied that the 30mph limits have been extended far enough. In Little Glemham we would want to see the current 30mph limit extended northwards to beyond the junction of Buttons Road with the A12. This is because of the increasing traffic using Buttons Road, particularly HGVs, but private cars as well – a right turn from Buttons Road

		<p>onto the A12 is particularly dangerous as the A12 at this point is 50mph. We believe that a reduction to 30mph will provide a suitable deceleration as traffic approaches the proposed Park Farm roundabout at the start of the southern end of the TVB.</p> <p>Both villages argue that the stretch of road between Marlesford and Little Glemham should be made 30mph. From an environmental point of view, it makes no sense for traffic leaving the proposed Marlesford 30mph zone to accelerate to 40mph before very quickly decelerating again to enter Little Glemham. By making the stretch of road between the two villages a continuous 30mph road, it would mitigate traffic impacts on the properties between Milestone Farm and Little Glemham and it would make use of the laybys and the Keepers Lane junction much safer.</p> <p>We will continue to argue for this with both the Applicant and SCC, but we would ask the ExA to seriously consider these additional measures as a means of enhancing safety for all road users on this unimproved stretch of the A12.</p>
1b.	Pedestrian crossings.	<p>Eight crossing points are proposed in total. In Little Glemham a signalised crossing is proposed to the west of the Church Road/A12 junction and two dropped-kerb crossings are proposed at the new gateways to the village.</p> <p>In Marlesford, an uncontrolled pedestrian crossing is proposed to the east of Marlesford Road/A12 junction and a signalised crossing is proposed immediately to the east of to Marlesford Bridge. A further uncontrolled crossing is proposed at Milestone Farm to the east of the village. Two dropped-kerb crossings are proposed at the new gateway locations.</p> <p>Safety for our residents when crossing the A12 in the two villages is paramount. A young girl was killed a few years ago in Little Glemham whilst crossing the road and we must do everything to ensure that no further deaths occur, especially taking the cumulative impact of SZC and the Friston substation into account. We will accept nothing less than signalised crossings in approximately the locations being proposed. We need to flag with the ExA however that both the Applicant and SCC have said that signalisation is subject to their ability to accommodate the</p>

		signals at the proposed locations. We argue that it is up to the Applicant and SCC to ensure that they <u>can</u> be accommodated as signalisation is seen as the only safe way to provide a pedestrian crossing.
1c.	Footways	In Marlesford, improvements to footways are proposed on the north side of the A12 from west of Marlesford Road/A12 junction to the Bell Lane/A12 junction and from Bell Lane to the Milestone Farm uncontrolled crossing. Further Footway improvements are proposed on the south side of the A12 between the Farm Café and Ashe Road. We will be asking the Applicant to enhance existing footways in the village. There is a question over the amount of land in SCC Highway's ownership and therefore their ability to deliver the required width of footway. We recognise that none of the land in the two villages is included within the DCO, but we argue that simply because land is not in the ownership of SCC, it should not preclude the delivery of facilities which will improve the safety of pedestrians and cyclists.
1d.	Quiet road surfacing	It is proposed to provide quiet road surfacing in both villages. This measure is welcomed, but we will be asking that the quiet surfacing is extended to the east of both villages to reduce the noise of traffic approaching from the east. We will also be insisting that SHW CI942 level 3 TSCS quiet surfacing be used through both villages. SCC (through agreement with the Applicant) will agree to maintaining the quiet surfacing throughout the SZC build period. We believe there is a legacy opportunity here for the quiet surfacing to be funded by the Applicant for a minimum of 20 years beyond the end of the SZC build period, unless a bypass of the two villages has already been delivered. We would appreciate the ExA considering this proposal which we regard as being reasonable.
1e.	Bell Lane/A12 junction layout - Marlesford	Bell Lane, at its junction with the A12, is particularly dangerous for drivers of vehicles turning right onto the A12. Traffic travelling from the north is hidden from view until it appears over the brow of the hill. Technically, this is regarded as acceptable – in practice, it leaves limited time for drivers to make their turn. The reduction in the speed limit through the village should help, but we have a

		fear that the increase in traffic will simply mean that gaps in A12 traffic will close up and limit the opportunities to turn across the traffic. There follows from this, a concern that drivers will take risks in order to get across the carriageway – there is therefore a potential for an increase in the number of accidents (something we refer to below). The Applicant has proposed improving the kerbs at the junction and has suggested some trimming of vegetation. We will continue to seek more substantial improvements to this junction and we would ask the ExA to make themselves familiar with the current deficiencies.
1f.	Church Road/A12 junction layout – Little Glemham	Some minor improvements are proposed to this junction – partly related to accommodating the signalised pedestrian crossing to the immediate south west. Little Glemham Parish Council welcome the proposal to erect an “unsuitable for heavy goods vehicles” sign at the Church Road/A12 junction but would ask that a similar sign is erected at the eastern end of Church Road.
2.	Additional Issues	Reasons and Concerns
2a.	Alignment of Two Village Bypass	The ExA will be aware of the view of Marlesford and Little Glemham that the proposed alignment will almost certainly preclude the future bypassing of our two villages. This is borne out by the comments from SCC at Para 2.24 in their Deadline 2 Written Representation [Rep2-189] where the Council states <i>“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.”</i> We refer the ExA to Marlesford’s Deadline 3 submission [REP3-111] and other submissions by this Parish and to the Councils’ Joint LIR [REP1-045]. The implication of the above statement by SCC is that any future attempt to deliver a bypass solution for Marlesford and Little Glemham is likely to be prohibitively expensive and our two villages believe that the approach of the Applicant (knowingly or not) condemns us to live with an

		<p>unimproved stretch of road which is acknowledged to be inadequate for the traffic using it and for the residents living in close proximity to it. We can envisage a situation, after completion of the TVB, where no action is taken to bypass Marlesford and Little Glemham for at least a generation. This cannot be allowed to happen simply because of the adoption of the Applicant's least cost TVB solution.</p> <p>We ask the ExA to look again at the issue of TVB alignment and to seek a design that would facilitate rather than preclude the future delivery of a full Four Village Bypass.</p>
2b.	General weight of traffic on the A12 through Marlesford and Little Glemham.	<p>The Applicant argues that the A12 through Marlesford and Little Glemham has the capacity to accommodate the traffic generated by SZC. Technically, this may be the case, but the lived experience of residents of the two villages who live along its route, and those using the A12 in the two villages, suggests that the A12 is already over capacity without the impact of either SZC or the on-shore works associated with EA1-N and EA2. At Para 15.16 in the Joint Councils' LIR [REP1-045], the Councils state that "<i>SCC's Local Transport Plan 2011 sets out that there are also long-standing issues of traffic volume through the villages of Marlesford, Little Glemham, Stratford St Andrew, and Farnham on the A12</i>". They go on to say at Para 15.103 "<i>The increase in HGVs, buses and light vehicles during construction [of SZC] will increase delays, severance, fear and anxiety of vulnerable road users and reduce amenity along the A12 corridor, most notably at Martlesham, Woodbridge, Marlesford and Little Glemham</i>". The Councils also predict at Para 16.61. "<i>The completion of the Two Village Bypass is likely to induce further traffic on the A12, negatively impacting those communities where mitigation has not been provided</i>". These comments accord exactly with the views from our two villages, but we would point out that even with mitigation, it cannot reduce the traffic volumes coming through the villages and will only partially ameliorate the adverse impacts of that traffic.</p> <p>We ask the ExA to note the volume of traffic using the A12 in Marlesford and Little Glemham.</p>

2c.	Junctions and accesses to the A12 in Marlesford and Little Glemham	<p>There are seven locally significant highway junctions with the A12 in the two villages:</p> <ul style="list-style-type: none"> • Marlesford: <ul style="list-style-type: none"> ○ Marlesford Road ○ Ashe Road ○ Bell Lane • Little Glemham <ul style="list-style-type: none"> ○ Keepers Lane ○ Shop Lane ○ Church Road ○ Buttons Road <p>In addition, there are a number of other minor accesses, business premises and a significant number of private dwellings with access direct onto the A12. In general, left turning is a slow process whilst drivers wait for gaps in the traffic, but it can usually be executed, with patience. However, executing a right turn can be a very time-consuming manoeuvre and has led to many incidents of risk taking as drivers get fed up with waiting for a gap to coincide in both flows of traffic.</p> <p>The Councils in their Joint LIR [REP1-045] state at Para 15.104 <i>“The increase in construction traffic along the A12 will reduce exit capacity for the large number of side roads and 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 community facilities and businesses”</i>.</p> <p>We believe that the Councils’ assessment is an accurate one and we would ask that the ExA take note of the current difficulties that vehicles have when wanting to turn right and consider the potential impacts of increased traffic on the ability of vehicles to join the A12.</p>
2d.	Proximity of domestic dwellings to the A12 in Marlesford and Little Glemham	<p>There are a number of domestic dwellings within a matter of metres from the A12 carriageway. The impacts of noise, air quality (including dust) and vibration already affect residents’ quality of life, and despite the proposed use of quiet surfacing through the two villages, we believe that noise will remain a problem.</p>

		<p>As an easily achievable contribution to reductions in noise and air pollution, we are seeking the use by the Applicant of an “all-electric” bus fleet to run from the two park and rides to the main development site. We also seek the <u>exclusive</u> use of Euro VI HGVs as a means of reducing the impacts of SZC traffic on air quality. Despite the contention by the Applicant that vibration is always perceived to be more of a problem than it actually is (ISH8 contribution by the Applicant’s vibration consultant), Marlesford and Little Glemham residents regularly complain about the levels of vibration experienced when laden HGVs are using the road. The problem from unladen HGVs is “body rattle” – a noise source that will not be affected by the use of quiet road surfacing.</p> <p>We expect the Applicant to make a commitment to funding appropriate additional glazing to properties in the two villages - if they are shown to be subject to adverse noise impacts.</p> <p>In relation to the proximity of properties to the road, we would ask the ExA to give serious consideration to our request for a suite of baseline data for noise, air quality and vibration to be prepared prior to the start of construction. We then request that ongoing monitoring is carried out in the two villages throughout the construction period. We see this as a low-cost commitment for the Applicant and one that would provide comfort to residents of the two villages.</p>
2e.	Pedestrian and cycle path from Marlesford to Fiveways roundabout.	<p>The existing footpath from Marlesford to Wickham Market on the northern side of the A12 is wholly inadequate and is in some places unusable. It is in everyone’s interest to encourage a modal shift in transport and we want to be able to allow residents of Marlesford the opportunity walk and cycle safely from the village to Wickham Market - the closest service centre to Marlesford. The Joint LIR [REP1-045] acknowledges this need at Point 18g in Table 18: where it refers to <i>“Improvements of footway and cycling infrastructure linking the site to Wickham Market and Marlesford for Southern Park and Ride”</i> as being a positive contribution which should be secured by obligation/through DCO plans. To date there has been no commitment by the Applicant on the provision of such a cycleway and pedestrian route, but we will be insisting on its provision and the</p>

		<p>Applicant should see it was an opportunity to deliver a long-term legacy benefit. We understand that there are concerns over the availability of land and whether there is enough in Highways' ownership to be able to deliver the footpath and cycleway. Our view is that on such an important measure for safe pedestrian and cycle use, land ownership should not be a barrier to delivery and if required, additional land should be acquired by SCC Highways.</p> <p>We ask the ExA to full acquaint themselves with the current state of the footpath between Marlesford and Fiveways roundabout and see for themselves the need for a safe and sustainable route to Wickham Market.</p>

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