

WICKHAM MARKET PARISH COUNCIL



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SIZEWELL C: Application for Development Consent Order

Written Representation to PINS for Deadline 5 July 23rd 2021 (ISH 2, 3 and 5)

Further to ISH 2 (7th July) and 3 (8th July) Traffic and Transport

Summary of our position:

1. WMPC remain seriously concerned about the adverse impacts arising from the estimated 1000 plus vehicle journeys per day through Wickham Market. This number is estimated and may be exceeded.
2. WMPC are seriously concerned with the issue of the A12 as stated by SCC in the Local Impact Report that *“Construction traffic HGVs, AILs, abnormal loads, buses, cars and LGVs will increase delays across Suffolk’s highway network, specifically, along the A12”*.
3. It is inevitable that the increase in traffic on this strategic corridor will lead to delays and other rat running on our local road network particularly during the construction of associated development.
4. WMPC have been in consultation with EDF since December 2019 regarding the concerns expressed and to press EDF to deal with / devise traffic mitigation measures to offset the impacts their project will cause. Despite many serious reservations (some aspects of the scheme result in parking and crossings placed within critical highway visibility splays) WMPC consider that the traffic mitigation proposals for the village road network are almost at a stage where they should go to a village and parishes public consultation. However this is subject to reviewing the highway safety audit we were promised by EDF at the end of June.
5. Today, 23rd July at 13.25pm a 38 page document ‘Wickham Market Improvements Road Safety Audit’ has arrived for a discussion on Monday 28th July. The timing is typical, poorly timed and does enable effective consideration.

6. We had hoped that the scheme would also include measures to reduce traffic volumes and to monitor traffic routes. We had also hoped that the measures would have been produced much earlier (in 2020) and ideally prior to the DCO process commencing.
7. We still have significant concerns regarding the effectiveness of the measures proposed to deal with the increased traffic volumes, traffic speed, safety of pedestrians and cyclists, residents parking provision (to be reduced), and general ease of access for both residents and people accessing the key service centre.
8. Some concerns and requests presented in writing by WMPC have not been addressed, these relate to our desire for a 20mph speed limit, vehicle monitoring and the provision of traffic calming measures at road junctions along the High Street and adjacent road network.
9. We were pleased to be given the opportunity to attend part of the ASI visit on 10th June. However, we were disappointed that there was a lack of time available for the Panel to thoroughly look at the road network through the village and areas where we have specific concerns. These were set out in our ASI document dated 12th May for deadline 1.
10. We would be pleased if the panel can carry out further visits particularly during busy times of day and to experience the current traffic volumes and speed at which many drivers travel. There are times when hold ups occur for large HGV vehicles passing through the village (both High Street and B1078) and accessing local businesses.
11. We are surprised and concerned by EDF's and Suffolk County Council's answers to the Examining Authorities written questions Document 9.11 June 2021 PINS reference EN010012. WMPC do not understand how the partially designed scheme offered at the time of writing will keep *'impacts below a significant level'*. The scheme **does not** offer any **reduction in additional traffic volumes**. EDF have consistently failed to address the options for monitoring traffic in terms of routes followed to the SP&R site.
12. EDF have provided extracts from a 2019 parking occupancy survey (WMPC were not party to that survey). This lists out alternative potential parking locations which were also referred to in ExA Qu/answer AR.1.22. However, the alternative parking locations suggested at Spring Lane (this is being proposed as a Quiet Lane), Barhams Way and Border Cot Lane are all entirely unsuitable for this purpose. This due to a combination of issues existing road scape, lack of space, other residents parking and likely concerns, lack of footway, lack of lighting and remote access. As a long legacy project these options for displaced residents parking are inappropriate.
13. When raised at our last meeting with EDF on 28th June EDF noted that referral to the 2019 parking occupancy survey in the answer to question AR.1.22 was an error on their part. They appeared to be unaware of any suggestions in their answers to the Ex Auth for displaced parking to be relocated to the local residential roads.

1. Further to ISH 2 and 3 (7th and 8th July 2021) and points raised by A Stansfield

In summary:

- 1.1 We have suggested methods to monitor worker traffic to the SP&R site and although one meeting took place with EDF on this subject EDF have not accepted any methods we suggested to monitor traffic. Nor have they provided any reasoning for not considering our detailed proposals on this matter. We raised this again at our meeting with them on 28th June and were told by SCC Highways that this matter should be raised at the DCO inquiry.
- 1.2 We do not consider that this matter is being taken with the seriousness that it warrants. Residents lives and livelihoods are being placed at risk and EDF need to account for this.
- 1.3 Without effective monitoring it will be impossible to control the volume of SZC traffic passing through Wickham Market and also using the neighbouring roads and lanes. Our neighbouring parishes are also concerned about traffic volumes and rat running routes which are likely to arise.
- 1.4 We learnt at the ISH on 7th June that EDF prefer the term 'route choice' to rat running. Herein lies our concern, if drivers choose their routes then we will experience very serious local issues around workers and LGVs using local roads to access the SP&R site. We know that the suggested methods, mobile app with geofence and smart cameras with ANPR, will work and we can provide PINS with further detail on this topic.
- 1.5 The B1078 both west of and through our village does not have sufficient safe capacity to cope with additional traffic volume increases, including the cumulative increases arising from other developments served by this road. Suffolk County Council 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 leave it to be addressed through the Transport Review Group.

2. Monitoring of worker journeys to work location.

2.1 We will not repeat the description (previously submitted at D/L2 REP 2-493) of the mobile phone app and use of geofences to monitor the workers' journeys. However, we would like to emphasize that it is **not a tracking system**. The phone used for monitoring will know its position from GPS at any point in time, but that data is not transmitted to be stored in any connected computer system. Mobile phone users often allow the GPS position of a phone available to Google or Apple depending on settings on the phone and is often used in searches to find nearby points of interest. The methods described are no more intrusive in terms of privacy.

2.2 The salient points are as follows:

Mobile phone app with geofences

- Geofences are controlled by EDF. EDF may wish to consult on the geofence definitions with the local community
- The app need only be active to monitor the journey to/from work
- The app will download the geofence data
- The app will be aware when the phone is inside a geofence and will report: entry time, exit time, geofence name and information to allow EDF to identify the driver. It need not report exact locations.
- EDF will be storing personal and vehicle details of workers for other reasons - for example access to car parks and the main site. Therefore, there should not be any GDPR issues that are difficult to overcome.

Smart cameras with number plate recognition

- Registration numbers to monitor can be downloaded to the camera
- Cameras can be placed on any road that requires monitoring
- The camera would only report on the downloaded registration numbers
- It would be possible to download registration data to the camera on a time basis, so that vehicles would only be monitored during the expected journey times to and from work.
- EDF will be storing personal and vehicle details of workers for other reasons -for example access to car parks and the main site. Therefore, there should not be any GDPR issues that are difficult to overcome.

2.3 The increased traffic volumes on local roads will be a particular problem if local people are employed on the project, as these people may also be residing in the local parishes and be needing to travel to the SP&R site. Whilst local jobs will be welcomed we need to be sure of the traffic monitoring of those workers which will take place, including regular data collection and management of traffic volumes, speeds and driving behaviour.

Construction Worker Travel Plan

2.4 The Construction Worker Travel Plan states 980 drivers to southern park and ride. EDF estimate 1050 vehicles per day through WM (525 vehicles in each direction) along the B1078 through Wickham Market. We assume this to mean that 50% of cars travelling to the SP&R will travel through Wickham Market.

2.5 We expect congestion to occur through Woodbridge on the A12 which will cause additional traffic to use the B1078 and other roads through 'route choice' to travel to/from Ipswich, and west to the A14.

2.6 WMPC and our neighbouring parishes consider that a baseline survey of traffic through Wickham Market and on the roads accessing the parish before the commencement of construction of SZC must be carried out. This should be followed by monitoring, leading up to and during construction of SZC in order to have a complete picture of traffic history. The monitoring should be devised so that Sizewell traffic can be isolated from other traffic. For example, if local traffic diverts along the

B1078 due to congestion at Woodbridge when Sizewell construction starts prior to the SP&R opening it will be apparent that congestion at Woodbridge is the cause of extra traffic on the B1078. This information would verify the assumptions and modelling of traffic affecting Wickham Market.

2.7 We have noted the draft Section 106 dated May 2021 and the draft 1 Deed of Obligation dated June 2021. Whilst we welcome the thrust of continuing liaison, we **do not** support the term used in the agreement - 'Wickham Market *Improvement Scheme*'. The scheme proposed at the current time cannot be described as such. The volumes of traffic proposed by EDF to pass through the village and the measures currently proposed for the road network cannot be described overall as an improvement scheme. They may offer some mitigation but as yet we do not know the views of residents. We could accept the use of the term 'Traffic mitigation scheme'.

2.8 We noted EDF offer at ISH 2/3 of Cycling Connectivity Fund. However, we are still awaiting details relating to the provision of cycle links to and from the SP&R to Wickham Market and Marlesford. At the time of writing the plans remain unclear as to the details of this provision and how this relates to the necessary footway improvements. Some of the route between the B1116 roundabout and SP&R will require land to be secured beyond the DCO red line.

2.9 With respect to the SP&R site TIMA, we listened to the comments regarding the possibility of 100 HGVs needing to use the TIMA in the event of an incident of the road network. We are concerned that the area indicated on the plans (such as GA SZC-SZ0204-FP-000-DRW-100009) may not have the capacity for 100 HGVs. Nor is there any entry point indicated into the TIMA area, only an exit back into the main car park roadways and on to the A12 / slip road.

2.10 We have discussed this with our neighbouring parishes and followed up with a query to EDF on 15th July, as yet no reply has been received:

- SP&R site proposed TIMA, is there a plan showing how 100 HGVs might fit into the area indicated on plans (double hatching). Is there sufficient space in this area?
- We have not located a plan indicating lighting for this area but you have previously confirmed that it will need to be lit.
- We are unable to locate the entry point into the TIMA, only an exit road (approx. 5m wide) from the TIMA (arrow indicates) into main site area is shown. The boundaries between the zones are all fenced. We have looked at the detailed site plans for drainage, signage and general arrangement at full size prints but remain unclear as to how the access will be accommodated.

'ISH 5' 13th July Landscape and Visual Impact and Design

3. Summary of our position (not discussed at ISH)

3.1 WMPC were very disappointed that there was insufficient time for WMPC and neighbouring parishes to speak at the ISH5 (Item 8) especially given preparation and

planning by working individuals. We understand that a further ISH will be convened to give time for this topic (Item 8) and other items to be discussed during the examination process.

3.2 The matter was raised by Marlesford PC with PINS immediately on 13th July and a new date for this ISH has been promised in principle. We hope to be given advance notice of the date to ensure that representatives are available.

At DCO Deadline 3 WMPC made the following point:

3.1 With respect to the ExAuth question to EDF LI.1.122 the Applicant/EDF has responded that,

“Since the submission of the application, SZC Co. have engaged with Marlesford Parish Council and other interested parties to work together to reduce and/or avoid the impacts, where possible, associated with the construction, operation and removal and reinstatement of the southern park and ride at Wickham Market. SZC Co. has sought to reduce any impacts of the proposed development through a range of mitigation measures embedded through the Associated Development Design Principles (Doc Ref. 8.3(A)).”

3.2 The statement is not correct. Despite requesting that this matter be discussed in detail with EDF the only meeting which EDF have agreed to regarding SP&R site LVI issues was held on 8th October 2020 with our group of interested Parishes. Apart from the reinstatement of the bund to the northwest boundary of the site, we have seen no other substantive changes to the proposals. We await further detail on mitigation measures to address the concerns and legacy issues raised at the meeting last October.

3.3 We have looked at some of the Hinkley sites and observed the ‘mass planting of trees (and plastic tubes) that has taken place. This is often poorly designed, highly expensive and wasteful, poorly executed and left unmanaged. Invariably such planting does not result in a long-term landscape solution or enhancement. For the SP&R site WMPC consider that a more sensitive solution should result in an element of mitigation, which can remain in perpetuity, and (eventually) accord with local landscape character, enhancing the farmed landscape and its varied habitat value. The woodlands are currently an important habitat for buzzards and red kites which can be seen and heard in the wider area. The habitats are critical but there are concerns that wildlife might be displaced as a result of activity, noise and light pollution.

3.4 WMPC are pleased that EDF have now addressed two new assessment viewpoints from Wickham and Pettistree as requested by the ExAuth. These are indicated in EDF document 9.11 Part 6/7 and are Figures 18.51 and 18.52. The positions chosen do not give the clearest views of the site from these two public rights of way; nor do they indicate the extent of the SP&R in the panoramic photographs, however they do show that the site will be viewed on the skyline. Both Figures identify Adverse effects but there is no further landscape mitigation proposed as a result of the locations being assessed. The images reinforce the

need for appropriate mitigation to be undertaken in the southern area of the SP&R site and around the slip road and site access.

- 3.5 We have queried the TIMA site area and access into it as stated above at Para 2.8. If this site area, access and capacity is not shown to be adequate, this will lead to further concerns about loss of farmland, expansion, and the highway network. Lighting of the area along with the car park itself is also of local concern. Whilst the car park lighting is shown in the suite of plans shown 'not for approval', the TIMA lighting is not. Light pollution will be experienced across wide parts of our local Parishes, WM, Marlesford, Hacheston and Pettistree.
- 3.6 It should be noted that there are still a number of plans which do not indicate the reinstated bund on the NW boundary of the site.
- 3.7 We have requested provision for a footpath link between the bridleway (8) and footpath (7), alongside the bund to the A12. This is indicated on the landscape masterplan but to date other plans have not been updated for issue.
- 3.8 Precise details are requested regarding the crossing point of the ancient bridleway 8/hedges/hazels and oak tree so the impacts can be fully understood and moderated by new planting and management.
- 3.9 The west site boundary/Bridleway 8 remains an area of serious concern where there is a lack of space for any effective screen planting. For a distance of approx. 150 metres there will be clear views into the site (Hacheston and B1116), the car park, coach parking and TIMA.
- 3.10 Finally we recommend that our previous advice regarding site boundary planting is encapsulated i.e. new boundary and hedges and trees. We also wish to see new planting of a suitable area (copse or spinney) which will provide some screening of the impacts arising from the slip road works, the access road into and out of the SP&R site and elements of the site itself. The landscape rises some 8 metres from the Fiveways roundabout (at 20m AOD) to the centre of the site (at approx. 28m AOD). This topography means that planting in the vicinity of the site access road will need to be either accompanied by mounds or planted on raised ground to be effective.
- 3.11 We have requested that opportunities for off-site planting secured by the S106/or Deed of Obligation be explored to provide some screening and a long-term legacy of landscape enhancement within the vicinity of the SP&R site.
- 3.12 Other concerns regarding the choice of this site and the adverse landscape and visual impacts arising from it have been submitted in our Relevant Representations and at DCO Deadlines 1, 2, 3.

Final 23rd July 2021 PINS EXAMINATION DCO PROCESS Deadline 5
 WMPC web site: [SIZEWELL C » Wickham Market Parish Council \(onesuffolk.net\)](https://www.wickhammarketparishcouncil.co.uk/size-well-c)