

WICKHAM MARKET PARISH COUNCIL



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Freepost SZC Consultation

20th March 2019

Dear Sir/Madam

Wickham Market Parish Council response to Sizewell C (SZC) stage 3 pre-application consultation

1. Introduction

- 1.1. This response represents the views of Wickham Market Parish Council. We have coordinated this response with surrounding Parish Councils. We understand that if the project goes ahead then EDF only propose one location for the Southern Park and Ride which is the Wickham Market option. Unless a suitable diversion route can be found for Wickham Market the Parish Council will not be able to support the SZC project.
- 1.2. Wickham Market is a large village which acts as a key service centre for some 24 surrounding villages. It lies just north of the A12 some 14 miles North East of Ipswich. The B1078 runs through the northern end of the village and this road connects the A14 to the A12. This route is used as a cut through by many travelling from the Midlands and wishing to go north on the A12 or vice-a-versa. The B1078 is a designated HGV route for vehicles accessing the hinterland villages northwest of the village such as Otley, Debenham and Debach. However, the B1078 is a narrow road and is not wide enough for two-way HGV traffic in many locations. At peak times there is already vehicle congestion on the B1078 in the section at runs through the village.
- 1.3. It is excellent to note that our concerns regarding traffic though the north end of Wickham Market that we outlined at Stage 2 Consultation were taken into account and two mitigation measures have been proposed at Stage 3. Unfortunately, neither of these measures withstand our scrutiny. It may be possible to amend the proposed diversion route to provide a workable solution.

2. Overview

- 2.1. In principle Wickham Market Parish Council are not against this significant project as it will increase employment opportunities for the residents and may slow the trend of Wickham Market becoming a retirement community. However, unless a suitable diversion route can be found for Wickham Market the Parish Council will not be able to support the SZC project.
- 2.2. Wickham Market is a large village which acts as a key service centre for some 24 surrounding villages. It lies just north of the A12 some 14 miles North East of Ipswich. The B1078 runs through the northern end of the village and this road connects the A14 to the A12. This route is used as a cut through by many travelling from the Midlands and wishing to go north on the A12 or vice-a-versa.
- 2.3. We are concerned that the Sea option for the movement of materials has been discarded with what seems to be inadequate justification. Left with the choice between a road-led and a rail-led option we strongly support the rail-led option.
- 2.4. Wickham Market are in the process of securing funding for a new Village Hall. At this stage we wish to put down a marker for a strategic Community Fund grant to assist with this project.
- 2.5. We are still concerned that no Delivery Management System (DMS) is to be used for LGVs as 700 movements a day are forecast of which 175 are associated with the Southern Park and Ride. A significant number of these are expected to use the B1078 as their route of choice.
- 2.6. It is noted that EDF's only proposed option for the Southern Park and Ride is the Wickham Market option. However, from Stage 2 to Stage 3 the size of the park and ride has grown from 900 to 1250 vehicles. We do not disagree that, from a traffic management perspective, having one large site is far easier to manage, but the option of a number of smaller park and rides on the southern side would significantly reduce the impact in Wickham Market and be more convenient for the workers. We urge that this possibility is given further investigation.
- 2.7. Wickham Market Mitigation Option 1 suggests removal of roadside parking on the B1078 from the junction with the High St to Rackham's bridge for the 12 year duration of the project and in our opinion is clearly not workable. Of interest Wickham Market is not currently considered to be of significant accident concern as the parked cars on the roadside have the effect of slowing the traffic down significantly. Wickham Market Parish Council strongly supports roadside parking and this view is borne out by our Neighbourhood Plan. Specifically, we think this option is flawed for the many reasons given in our response.
- 2.8. Wickham Market Mitigation Option 2 suggests a bypass for the village and this concept is very attractive, but the suggested route is not viable. Wickham Market Parish Council have suggested a possible alternative, but this option is not supported by all councillors. Should a bypass be provided it would provide an excellent lasting legacy for the village.

3. Wider Issues

- 3.1. The technology of smaller nuclear power plants is now significantly more advanced than when Sizewell C was proposed. It may be that it would be better to invest in a number of these smaller plants rather than sinking so much money into this one venture.
- 3.2. Climate change is a reality, and this is leading to a rise in sea levels. The UK Committee on Climate Change are estimating sea levels will rise by 1m by the end of the century. In addition, more extreme weather events are happening more frequently. Sizewell C is on the coast and its defences are only 14m above sea level. Should a record storm surge or a seismic event occur in the North Sea then the defences could be over topped and a disaster similar to Fukushima could result.
- 3.3. Sizewell C is not the only power project which is currently ongoing in East Anglia. There are number of offshore wind farms requiring substations and cabling. These projects will overlap with Sizewell C and the cumulative impacts should be taken into account.
- 3.4. The extra burden on emergency services created by the additional traffic in personnel coming to the area should not be underestimated.
- 3.5. It is evident from EDF's assessment of responses to Stage 2 Consultation that a Marine Led Freight Strategy was very well supported. WMPC support this method of moving bulky construction materials to the Sizewell C site. We are therefore extremely disappointed to see that the strategy is no longer being pursued. The option is discussed in a few short paragraphs without detailed reference to the background reasons for the dismissal. Cost, time and harm to the environment are all cited as barriers to the adoption of a marine led option.
- 3.6. Robust traffic management methods must be in place. However, if these methods depend on mobile phone communications an enhanced mobile coverage in East Suffolk will be essential. There are many pockets within East Suffolk where mobile coverage is extremely poor or non-existent.
- 3.7. The traffic modelling was done prior to the development of the new Local Plan by Suffolk Coastal District Council. This new plan proposes a significant additional amount of development within the A12 corridor which will create additional traffic. The cumulative effect is likely to mean that the rise in traffic has been underestimated.
- 3.8. Currently there is an hourly train service from Ipswich to Lowestoft. We are aware that Abellio East Anglia have an aspiration to run a half-hourly service on this line, but current infrastructure makes this impossible. With the investment that EDF would bring if a rail-led strategy is chosen it would seem prudent to use this opportunity to improve the infrastructure to a standard that would allow this to happen. This may then have the additional benefit that a greater number of trains would be able to be used in the rail-led strategy.

4. Sizewell C proposals: overall

- 4.1. In principle Wickham Market Parish Council are not against this significant project as it will increase employment opportunities for the residents and may slow the trend of Wickham Market becoming a retirement community.
- 4.2. Our major concern still relates to traffic as the current road network will struggle to cope with any increase. It is of deep concern that the Stage 3 consultation shows clearly that EDF have no confidence in Network Rail completing the required infrastructure work for a rail-led transport option on time. The project is of such importance that, with government assistance, Network Rail should allocate sufficient priority to the works to ensure timely completion.
- 4.3. The lack of traffic management for vehicles under 3.5T gives these vehicles free rein to travel on the route most convenient to them. With the significant increase in traffic this significantly increases the chance of “rat-runs” being created which destroys the character of Suffolk’s country lanes.

5. Main development site: overall

- 5.1. No Comment

6. People and economy

- 6.1. Sizewell C will provide a significant number of jobs but the current unemployment in this part of East Anglia is very low, consequently many jobs will have to be filled by people from outside the area. Hopefully, it will provide jobs for some school leavers and this may reverse the trend where youngsters are leaving the area in order to get work. With regard to tourism the owners of holiday lets may be extremely pleased as their properties may be full of site workers for the duration project. However, the tourist industry will suffer as there will be fewer holiday lets available thus reducing the number of visitors to the region’s tourist attractions. In addition, there will be much more traffic on the roads making it a significantly less desirable place to visit.
- 6.2. The additional personnel moving into the area for the project will place a significant burden on existing community facilities such as doctors, dentists and emergency services many of which are already working to capacity.
- 6.3. The additional demand for houses will push up prices. This is particularly worrying as the current average house price in Wickham Market is 7.6 times the lower quartile income which is one of the highest in the country.
- 6.4. Wickham Market are in the process of securing funding for a new Village Hall. At this stage we wish to put down a marker for a strategic Community Fund grant to assist with this project.

7. Accommodation: overall strategy

7.1. Wickham Market Parish Council supports the proposal to accommodate many of the work force on site as this will reduce traffic to and from the site. We realise that there are significant landscape impacts associated with this aspect of the project and strongly hope that these are taken into account in the final design,

8. Accommodation: temporary campus and caravan site

8.1. No Comment

9. Transport: movement of materials

9.1. Assuming the sea led option is not being considered further then the choice is between a road led and a rail led transport strategy, in that case Wickham Market Parish Council strongly favour the rail led option. This option will remove about 150 HGVs off the roads every day at peak construction, which is essential given the fact that the roads are very near their capacity at present. Even with the rail led strategy it is appreciated that considerable road movement will still be required. It should also be noted that we still prefer the rail-led option even though the trains travelling at night will be heard in Wickham Market.

9.2. Park and Ride facilities will be an essential part of the development and the concept of a Postal Consolidation Facility at the southern Park and Ride is a logical part of this strategy.

9.3. We are pleased to learn that both a Delivery Management System (DMS) and an Automatic Number Plate Reader (ANPR) system are proposed to track HGV movement for Tier 1,2 and 3 contractors.

9.4. We are still concerned that no DMS is to be used for LGVs as 700 movements a day are forecast of which 175 are associated with the Southern Park and Ride. A significant number of these are expected to use the B1078 as their route of choice.

9.5. We are pleased to see that measures have been put in place if there is an incident and these include an HGV holding area at the Southern Park and Ride and also at the Freight Management Facility (FMF). It seems that none of the modelling takes into account the relatively frequent occurrence of an Orwell Bridge closure due to high winds. A vehicle holding area, ideally south of the Copdock Interchange is believed essential in this scenario. If an Orwell Bridge closure happens then traffic will seek an alternative route. The second Orwell Bridge project has been shelved by SCC and the shortest diversion is through Ipswich which rapidly becomes very congested. The other favoured alternative, particularly if one is not travelling to Felixstowe, is via the B1078 which is designated as an HGV capable route. In the event of a road/bridge closure one would assume that contractors are allowed to deviate from their prescribed route, and this means a considerable number of HGVs could use the B1078, should the Orwell Bridge be closed, which would be unacceptable as there are several places on this route where two HGVs cannot pass.

9.6. We are concerned about the results of the traffic modelling. There are some results which do not make sense and are not borne out by the traffic monitoring

that we have done in Wickham Market. The figure which best estimates the traffic flow between the High St/Border Cot Lane junction and Rackham's bridge in Wickham Market is the one for location AC in table 6.2. This shows daily vehicle movement of 3650 and our measurements indicate that this figure could be 1000 movements a day short of the actual movements. It is also interesting to note that volume of traffic at location O in the Stage 2 Consultation was 4150 and this is reduced to 3850 in the Stage 3 Consultation document. We are aware that traffic flows were re-measured in Wickham Market in 2017 and suspect this is the reason, however, as your prediction is that traffic flows will rise, does it not indicate that a quieter period was used for measurement and hence the higher figure should have been used. It is also misleading to state that the current average daily figures in Table 6.2 are based on 2015 data, this cannot be correct as locations AC and AD were not monitored till 2017.

9.7. We are concerned at the increase in traffic shown by the modelling before Sizewell C commences. The consultation states that this takes into account housing growth between 2015 and 2027. The three locations where measurements were taken in Wickham Market O, AC and AD are predicted to increase by 61%, 48% and 44% respectively which is the 1st, 3rd and 4th highest of the 31 locations where the average growth was 24%. In addition, location P in Hacheston is only forecast to rise by 9% despite an explosion of houses in Framlingham since 2015.

10. Transport: Sizewell Halt or new rail siding

10.1. No Comment

11. Transport: rail led strategy, Buckleswood Road

11.1. No Comment

12. Transport: level crossings

12.1. No comment

13. Transport: level crossings (rail-led)

13.1. The Wickham Market named level crossing is in Campsea Ashe

14. Transport: road-led strategy, freight management facility (FMF)

14.1. We have no preference between the two proposed sites for the FMF, but we are in full agreement that an FMF is required on the A14. Of concern is the issue of an Orwell Bridge closure which has not been considered in the traffic modelling analysis. Neither of the sites proposed will be of any use for the 10 buses and 610 (Rail-led) or 1220 (Road-led) HGVs predicted at peak construction using the Orwell Bridge. An FMF, even if it is only an emergency FMF, is required at the Copdock Interchange location to cope with this scenario.

15. Transport: Park and Ride

15.1. Northern Park and Ride

15.2. No comment.

15.3. Southern Park and Ride

15.3.1. It is appreciated that EDF's only proposed option for the Southern Park and Ride is the Wickham Market option. However, from Stage 2 to Stage 3 the size of the park and ride has grown from 900 to 1250 vehicles. We do not disagree that from a traffic management perspective having one large site is far easier to manage, but the option of a number of smaller park and rides on the southern side would significantly reduce the impact in Wickham Market and be more convenient for the workers. We urge that this possibility is given further investigation.

15.3.2. We note that the Postal Consolidation Facility will generate an estimated 175 LGV movements a day and that no DMS will be used for these vehicles. We also note that no DMS will be used for private vehicles. Vehicles that are not controlled will travel by the easiest route and therefore any diversionary route must be better than the existing route if it is to have any effect.

15.3.3. The Southern Park and Ride is situated between two Special Landscape Areas and close to the Marlesford Conservation Area in a prominent location. There are opportunities to enhance the wider landscape and to mitigate visual impacts and this needs to be identified through the Landscape and Visual Impact Assessment process (LVIA) and reflected in the detailed design. If this were done a long-term legacy of landscape improvements (hedges, trees and woodlands) within the area can then remain in perpetuity. We are also highly concerned at the loss of part of the woodland, Whin Belt, the green lane/footpath and its associated ancient trees, this is skyline vegetation currently offering natural landscape mitigation to your proposed site. We made this point at Stage 2 consultation, unfortunately this issue has not been adequately addressed at Stage 3.

15.3.4. The junction where the traffic from the Park and Ride joins the A12 whilst heading north is poorly designed. The A12 should not be restricted to one lane before this junction as this will cause queues. The slip road onto the A12 heading north should be designed to be long enough to merge safely into the A12.

15.3.5. Junction at end of slip road when turning off the A12 going south onto the B1078 has very poor visibility. This must be improved.

15.3.6. The capacity of the 5 ways roundabout is questioned as it already struggles to cope at peak times.

15.3.7. Wickham Market would be an ideal location for some of the SZC workforce to reside. There must be a good footpath from Wickham Market to the Park and Ride and it would also be sensible to provide a safe cycle route.

15.3.8. The Park and Ride must be returned to farm land when the project is completed, and all measures should be taken to ensure that this happens. Wickham Market Parish Council are concerned that the land owner may wish

to retain that site for another use once Sizewell C is complete although we understand that this would need to be subject to a further planning application.

15.3.9. It is very disappointing that the proposed plans are not yet sufficiently detailed to get a clear understanding of the impact that this development would have. For instance, what shops, cafes, offices, facilities, signage and lighting would be provided on the site to cater for workers on long shift? We would expect all buildings to be low level and designed to suit this rural location.

15.3.10. Wickham Market Parish Council recommend that a shop selling beverages, snacks and papers should be located at this Park and Ride. It would be ideal if the local paper shop were given the opportunity to run this venture.

15.3.11. At the first Wickham Market junction on the A12 when heading north it must be clearly signed that the Park and Ride turning is at the next junction. If this is not done some will take this junction in error as it is likely that satnavs will direct vehicles through the centre of Wickham Market to reach the Park and Ride.

15.3.12. We strongly recommend that a sign saying "For Sizewell C Southern Park and Ride use A14 then A12" be placed on the eastbound carriageway of the A14 before the A14/A140 junction.

16. Wickham Market Mitigation Measures

16.1. We are very pleased to see that mitigation options are proposed for Wickham Market to cope with the additional traffic caused by the Southern Park and Ride however these options will not provide adequate solutions to the traffic problems.

16.2. The B1078 traffic passes through the northern end of Wickham Market just before it reaches the proposed Southern Park and Ride site and the A12. From the High St/ Border Cot Lane junction to Rackham's Bridge there is predominantly parking on the southern side of the road making the road single track due to parked cars. There is nowhere else for residents to park their cars and EDF have confirmed that there has been no attempt to seek locations or talk to landowners. In the section between Border Cot Lane and Spring Lane it is not possible for a driver to see if this section is clear before entering this stretch. The northern end of the village struggles to cope with the volume of traffic currently using the B1078, particularly in rush hour. The pavements on the north side of the road are narrow and often vehicles mount the kerb in order to pass vehicles coming the other way; this is particularly dangerous for pedestrians.

17. Wickham Market mitigation Option 1

17.1. The suggestion to remove roadside parking on the B1078 from the junction with the High St to Rackham's bridge for the 12 year duration of the project is clearly not workable. Of interest Wickham Market is not currently considered to be of significant accident concern as the parked cars on the roadside have the effect of slowing the traffic down significantly. Wickham Market Parish Council strongly supports roadside parking and this view is borne out by our Neighbourhood Plan. Specifically, we think this option is flawed for the following reasons:

- 17.1.1. Removing parking will increase the speed of the vehicles on this stretch of road. It will also increase pedestrian use as residents have to access their houses. The road is not wide enough for two vehicles to pass in places and the pavements are narrow. This will significantly increase the chance of a serious accident.
- 17.1.2. There are 23 vehicle access points within this stretch many of which have restricted visibility. Faster traffic will only increase the chance of an accident.
- 17.1.3. The part of the route from Spring Lane to the Border Cot Lane junction is a route used by many children as they walk to and from school from Barham's Way and King Edwards Avenue.
- 17.1.4. Alternative parking would be required for about 90 houses. No alternative parking areas have been suggested as there are none which would be suitable.
- 17.1.5. There are 25 houses that have doors which face onto the road. Many occupants are either not too mobile or have young families. These occupants would struggle significantly if they had to walk any distance to their homes.
- 17.1.6. There is a small business park near to Spring Lane with 6 shops/businesses. Without on road parking they would struggle to survive.
- 17.1.7. This stretch of road is often used by horses as the road connects Bridge Farm livery with various local bridle ways.
- 17.1.8. Wickham Market is a key part of many cycle routes and this stretch of is used for many sportives throughout the year.
- 17.1.9. The additional traffic will raise the pollution levels on this stretch of road.
- 17.1.10. Traffic travelling faster will increase the noise and vibration which is already a problem for some houses very close to the road.
- 17.1.11. On bin days the footways are not wide enough for pushchairs, wheelchairs or rollators to pass without going onto the road. With faster traffic this also increases the chance of an accident.
- 17.1.12. There are 41 listed buildings/structures in Wickham Market and 7 of these are located on this stretch of road. The historic environment will undoubtedly be damaged if no mitigation measures are provided.

18. Wickham Market mitigation Option 2

- 18.1. In principle the option of a bypass is very attractive, but the following observations on the proposed route indicate that the proposed suggested route is not viable:
- 18.2. The junction of Easton Rd and the B1116 is very poor. The suggested improvements are fully supported.
- 18.3. The section of road from Easton Rd to Glevering bridge is a flood plain which can be flooded for extended periods.
- 18.4. Glevering bridge is a single-track listed humpback bridge. It is narrow, has a weight limit of 10T and visibility is poor making it difficult to see if vehicles are approaching. This bridge is damaged fairly regularly resulting in closure.

- 18.5. The EDF proposal suggests widening and re-aligning the stretch of road from Glevering Bridge to the B1078. These suggested improvements should make the road two way, but the number of corners will not make it an easy road to drive.
- 18.6. There is a 25m pistol range close to the proposed diversion route at the junction just east of Glevering bridge. The proposed road improvements seem to impinge on the danger area!
- 18.7. The section of road past Valley Farm is well used by horses from the Valley Farm Riding Centre.
- 18.8. The junction where the diversion joins the B1078 is very dangerous. It is in a dip and vehicles coming from the Wickham Market direction will have very little time to stop should a vehicle be exiting or turning in to this junction.
- 18.9. It must be remembered that drivers will only use the proposed diversion route if it is easier. This proposed route is significantly more difficult to drive.
- 18.10. A possible alternative new road is shown in red below:

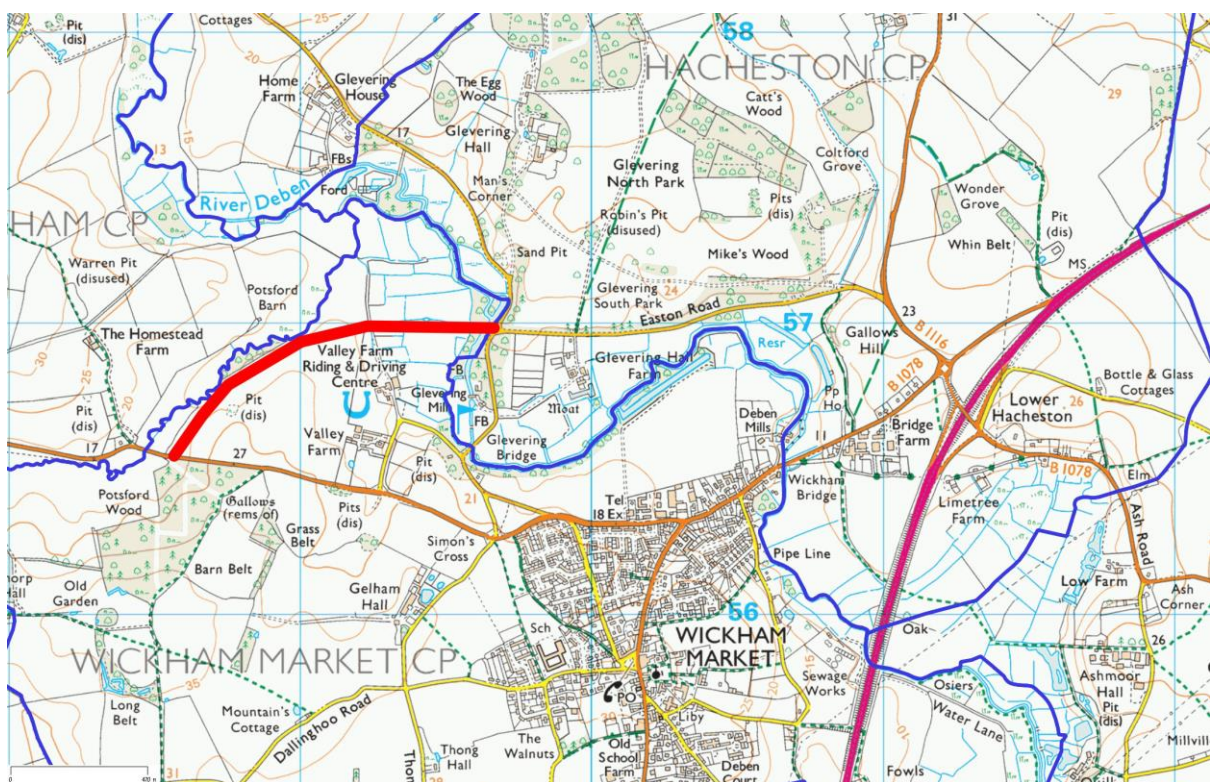


Figure 1 - Map showing Proposed alternative Route

This alternative has the significant benefit that road users will choose this route in preference to the existing road route as it will be quicker, a better road and an easier journey. The bridge/crossing over the River Deben will not be easy as it is on a flood plain however, once built it will form an extremely positive lasting legacy for Wickham Market as it will significantly reduce current HGV traffic through the north end of Wickham Market. It is appreciated that this option is not ideal from an environmental perspective and certainly does not have universal support within the Parish Council so if EDF could propose a better diversion route then that would be ideal. Alternatively, if there are significant environmental objections, the diversion route could be temporary, thus the river valley would be returned to its natural state after the project.

19. Transport: A12 two-village bypass

- 19.1. Wickham Market Parish Council agree that, of the 4 options proposed by EDF at Stage 2, the two-village bypass is likely to be the most beneficial option. That said the strong consensus within the village is that a dualled 4 villages Bypass is the best option. It is hoped that, should this project be given the green light, that the money set aside for the 2-village bypass by EDF can be added to government funding and the project will be complete in time for Sizewell C Construction. If this is not the case and the 2 village bypass proceeds, then there are significant issues with the current design.
- 19.2. The southern junction should be moved to the south by a few hundred meters to incorporate Tinker Brook road into the roundabout. If this is not done traffic turning in and out of this road could cause significant delay.
- 19.3. It seems that Walk Barn Farm has been completely cut off by the proposed bypass route.

20. Transport: road improvements

- 20.1. The road improvements suggested are generally supported. However, it is requested that when these improvements are finally designed that they will include provision for cyclists. It is very surprising that no improvements have been suggested for Coddendam as this location is currently extremely congested. Our comments regarding the Wickham Market diversion are given in paragraph 18.

21. Consultation process

- 21.1. We share the concerns of many other parties that that EDF are undergoing what may be the final round of consultation before submission of the Development Consent Order to the Planning Inspectorate. There seem to be so many issues that would benefit from a further round of consultation. We urge EDF to provide significantly more detail and solutions to the issues raised by our WMPC and many other parties and enter into a fourth stage of project consultation prior to the final DCO submission.



R J Jenkinson
Chairman
Wickham Market Parish Council