

WICKHAM MARKET PARISH COUNCIL



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SIZEWELL C: Application for Development Consent Order

Written Representation for Deadline 3 June 24th 2021

We make the following representation:

1. Issue Specific Hearings

- 1.1 WMPC would like to speak at the **Traffic and Transport ISH** on either Wednesday 7th or Thursday 8th July. We will give an update on our meeting with EDF scheduled for 28th June and any further information we have regarding traffic impacts and the scheme of 'mitigation' for WM.
- 1.2 We also wish to speak regarding Traffic Monitoring options for ensuring that EDF enforce/ensure that cars and LGV's follow prescribed routes to the SP&R site and do not rely on worker code of conducts only. We have as yet received no firm commitment that options available will be explored and implemented.
- 1.3 WMPC would like to speak at the **Landscape and Visual Impact ISH** (regarding the SP&R) on Tuesday 13th July. We wish to address landscape and design issues relating to the SP&R and in making the representation, we will be including comments from our neighbouring parishes of Pettistree, Campsea Ashe and Hacheston. We are aware that a Parish Councillor from Marlesford will also want to speak to this topic and we will be coordinating the topic areas that each of us will cover.
- 1.4 With respect to the ExA question to EDF LI.1.122 The Applicant 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 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))."*

1.5 However despite requesting that this matter be discussed in some detail with EDF the only meeting which EDF agreed to regarding LVI issues relating to SP&R was held on 8th October 2020 with our group of interested Parishes. Apart from the reinstatement of the bund to the north west boundary of the Park and Ride 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. We have looked at some of the Hinkley sites and observed the 'mass planting of trees (and plastic) and consider that a more sensitive solution for this site should result in some effective mitigation, and planting which can remain in perpetuity, (eventually) according with local landscape character and enhancing the farmed landscape.

1.6 Please note on Tuesday 13th July we will not be available (to join Teams or to speak) between 9.30am and 10.45 am.

2. ASI held on Thursday 10th June

2.1 We were pleased to be given the opportunity to attend part of this visit and to be able to speak at the site proposed for the SP&R. However we were disappointed that there was a lack of time available for the Panel to visit the WM viewpoints of the SP&R site and 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. We will be pleased if the panel can carry out further visits when time permits and will of course be happy to accompany these if requested to do so. We also appreciate that the Panel may have undertaken such a visit at an earlier time too.

2.2 We note that EDF state that the additional viewpoints we requested have been assessed but as yet we have not been able to locate the Figures 18.51 and 18.52 referred to.

3. Deadline 2 Ex A Questions and documentation received from SZC Co., SCC and ESC

3.1 We have read the document from EDF, Responses to Examining Authorities written questions dated June 2021 PINS reference EN010012.

3.2 We note the questions relating to the choice of the Hacheston site for the SP&R site and remain of the view that the site is unsuitable, both in terms of landscape impacts and the resulting detrimental traffic impacts on Wickham Market parish and village. Noting the reasoning for abandoning the Woodbridge option (and doubling the size of WM/Hacheston site) we fail to see how the Fiveways roundabout will not experience a greater risk of traffic incidents; this being a concern relating to the A12/Woods Lane roundabout.

3.3 The answers given at AI. 1.22 – 26 to the questions relating to the choice of the site are not satisfactory.

3.4 Question AR.1.22 has resulted in the following answer below:

SZC Co. has been working closely with SCC, ESC and Wickham Market Parish Council (WMPC) to develop a package of improvements for the village that will widen footways, improve pedestrian crossing facilities and control traffic speeds through the careful application of footway build-outs and kerb re-alignment. As part of the scheme proposals SZC Co. proposes to rationalise car parking along the B1078 through Wickham Market, creating safe places for pedestrians to cross, improving visibility from property accesses and creating highway geometry that encourages slower speeds.

(i) Yes. Traffic Regulation Orders will be required to modify the current parking restrictions along the B1078 in Wickham Market.

(ii) On the B1078 between Border Cot Lane and Spring Lane, the peak number of vehicles parked along the High Street during a parking occupancy survey in 2019 was recorded as 22; the future capacity would be 17 (loss of five spaces). The capacity of the long parking bay along High Street between Spring Lane and Lower Street would be reduced from 12 to 10 spaces – however the parking survey recorded a maximum of 10 cars parked along the kerbside east of Spring Lane at peak, suggesting that the future design would be sufficient to accommodate demand. On Border Cot Lane parking for seven cars will be provided on the southern side between the High Street junction and Riverside View. This represents a reduction of approximately 3 cars compared to the existing situation, taking into account the presence of crossovers already present. There would be no change in parking provision west of Riverside View.

(iii) During high parking demand periods (typically late evening and overnight), a small number of drivers would need to find alternative parking within Wickham Market. The 2019 parking survey showed spare capacity on side-roads. Barhams Way was found to have adequate spare on-street parking capacity for displaced parking, with a public footpath linked directly back to the B1078 High Street (around 120m in length).

(iv) The majority of parking along the B1078 in Wickham Market is unmarked. No blue badge spaces are marked. The scheme proposals include marked parking bays, and so could incorporate marked blue badge parking bays, should that be required.

3.5 SCC have answered Qu AR.1.22 as follows:

(i) As part of the Wickham Market Improvement Scheme some changes to the parking restrictions on the B1078 High Street between Border Cot Lane and the Deben Bridge are proposed. A Traffic Regulation Order would be required.

(ii) The design is not developed to a point where the exact number of parking spaces being removed can be given.

(iii) While great efforts are being made to maximise the retention of on-street parking there is a delicate balance between this, road safety (in particular for pedestrians) and minimising delays and congestion. There is no legal requirement to provide or protect on street parking, but a formal legal consultation process would normally be required to introduce any restrictions. SCC would expect that, as part of our consent with regard to Article 22 on this matter, we would expect there to be a consultation with local residents.

This process will enable residents to respond to the proposals.

However, it is clear that the removal of car park spaces will negatively impact local residents, and the local characteristics mean that provision of alternative car parking in the near vicinity of the lost car parks will be challenging.

(iv) The matter of provision of disabled parking has been a matter of discussion with Wickham Market Parish Council, but no final agreement has been reached regarding what, if any, provision will be made. Formal restrictions to provide disabled bays would be included within a traffic regulation order. Alternatively informal (but unenforceable) disabled bays can be provided without legislation. In either case the bays would be available to any road user with the necessary dispensation, not just residents.

However, this will not mitigate impacts on other people with protective characteristics,

such as elderly people who are not classified as disabled, or children. To SCC's knowledge, no assessment has been undertaken on impacts on people with protected characteristics.

3.5 WMPC have significant concerns regarding elements of these answers. The scheme has not yet responded to our desire for traffic calming measures at the three critical junctions/locations in WM (Chapel Lane/PO, Border Cot Lane and Spring Lane), nor has it fully addressed our desire for 20mph speed limit or zone. It has reflected some items referred to in the draft WM Neighbourhood Plan and those which were presented to EDF in March 2020 in our Working Document. We have not yet seen a satisfactory gateway design, nor any provision for cyclists travelling out of the village either to the SP&R or as part of the regularly used leisure cycle route.

3.6 We have requested the overall detail regarding parking numbers (both loss and alternative locations) and have requested (23rd June) sight of the 2019 Parking Survey of which we were previously unaware.

3.7 The possibility of using Barhams Way for displaced parking has not been raised or discussed at any time during our meetings with EDF despite our persistent questions. This road along with Spring Lane and Border Cot Lane are entirely unsuitable for permanent long term parking for High Street residents. The lack of footways, lighting, alleyway access (no lighting) between Barhams Way and high Street, other residents parking and road widths will all present practical issues. Residents do not and will not appreciate loss of parking and inconveniencing others to facilitate the additional volumes of traffic which EDF/SP&R will generate.

3.8 The matter of parking for disabled residents or road users has not been discussed at any time during our meetings with EDF. We note this has also been referred to by ESC.

3.9 **Question AR.1.23** has resulted in the following answer below:

EDF answer as follows:

... with regards to reducing delay though Wickham Market, SZC Co. has been working with the Parish Council to bring forward a public realm improvement scheme within the public highway which would represent the first phase of the implementation of the Wickham Market Neighbourhood Plan (rather than temporarily removing on-street parking on the B1078 or constructing a diversion route via Valley Road and Easton Road)

(ii) Any additional mitigation would be secured through the Deed of Obligation (latest draft of the Deed of Obligation is provided in Doc Ref. 8.17(C)). The public realm improvement scheme would address elements of the pedestrian safety, and cycling, walking and disability access routes policies of the draft Wickham Market Neighbourhood Plan, as well as deliver a number of the potential improvement works identified in the transport and movement section of the Neighbourhood Plan. Measures are currently exploring the introduction of village gateways, pedestrian crossings, narrowing of roads/widening of pedestrian routes, and demarcation of parking bays.

SCC answer:

(ii) The Wickham Market Improvement Scheme is intended to be the method by which mitigation can be provided to keep the impacts of the SZC construction traffic below a

significant level. SCC notes that these improvements are focused on Wickham Market and exclude the B1078 east of the parish boundary (Deben River Bridge) to the Southern Park and Ride access. Discussions with the Applicant are ongoing regarding this matter.

- 3.10 WMPC do not understand how the partially designed scheme offered at the time of writing will keep 'impacts below a significant level'. The scheme will 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.
- 3.11 We will explain how after convening meetings which commenced in December 2019 no satisfactory scheme has been delivered to address the issues highlighted by WMPC nor the solutions described by EDF.
- 3.12 We have also requested that any scheme be safety audited prior to public consultation and are concerned that EDF have advised this might be undertaken by the design company WSP. It is highly likely that there will be a conflict of interest.

4. To conclude

- 4.1 When we submitted at our WReps for D/L 2, 2nd June we stated that: *'no firm proposals (detail, scope, or specific measures) have been tabled by EDF, this despite regular meetings since December 2019. WMPC hope to receive a scheme shortly which can be used to consult the public. We have requested concern over some current proposals and the lack of speed controls proposed. We have also made clear that residents are unlikely to be able to welcome any reduced on-street car parking nor have alternative parking locations been proposed by EDF. No provision for either cycle or footway routes to the SP&R site are indicated on the DCO plans'*.

'As from March 2020, EDF brought in their traffic management and landscape design consultants to look at the WMPC Working Document which proposed several areas needing to be addressed and ways of providing traffic mitigation. After over a year of regular meetings, a design proposal should soon be ready for a public consultation carried out by EDF/SCC and WMPC. WMPC have requested that a highway safety audit of any scheme be carried out prior to that consultation. We have yet to receive final designs for village gateways, on street parking provisions and/or relocation for displaced parking, provision for cyclists travelling to SP&R or on the leisure route which sections of the B1078 provides nor agreements for speed reduction measures and controls'.

To date there has been no further detail presented to WMPC.

Wickham Market Parish Council Final 24th June 2021

Deadline 3

WMPC web site: <http://www.wickhammarket.onesuffolk.net/sizewell-c>

WMPC-SZC-SWG-DCO Process Written Reps for Deadline3 -24.06.2021