

Written submission of Campsea Ashe for Issue Specific Hearings; Deadline 5, 23/07/2021

Issue Specific Hearings on Traffic and Transport, ISH2&3

including issues of concern to Marlesford PC, Glemham, Hacheston, Snape and Tunstall. Comments are loosely in line with the order of topics on the ExA agendas for the two days.

Issue Specific Hearing 2 (ISH2) Traffic and Transport (Part 1)

Date: Wednesday 7 July 2021

Agenda Item	Topic	Campsea Ashe Comment
2	Freight Management Strategy	
	Capacity and delivery of movement of freight by rail	- CA hugely concerned re the 4 train a day are actually 8 movements a night, creating considerable impacts on the local residents. (see ISH4 submission) - CA is not convinced by the actual deliverability of a 60% sea/rail split for delivering bulk, aggregates etc. Only if it is, can the crucial HGV numbers be said to be minimised. - We share concern of other PC's re timing of the availability (early years), availability of network space (pathing) and sidings availability to hold 340m long trains. That therefore makes it difficult to correctly assess the full impact of HGV traffic on East Suffolk communities until these uncertainties are clarified. Suffolk County Council 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. - It is not clear whether the Applicant's plans for increased use of rail will not have an adverse impact on the operation of Felixstowe Port, which is a vital driver of the East Suffolk economy.
	Movement of freight by sea	We strongly support the increased use of marine transport of construction materials, but - again - the benefits in terms of HGV reduction will remain unclear until the Applicant produces its final plans.

	• Movement of freight by road	• 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”. It is inevitable that the increase in traffic on this strategic corridor will lead to delays – particularly during the construction of associated development. • We believe that the delays will lead to driver frustration, increased risk taking in order to overtake as well as the use of unsuitable minor roads as alternative routes (rat-running). 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. • CA, Hacheston & Marlesford are very concerned about its minor roads that access onto the A12. The increase in construction traffic along the A12 will reduce the ability of local drivers to safely turn onto the A12. • This – again - is also likely to contribute to increased “rat-running” on minor roads which avoid the A12. Particular roads such as the <u>B1078 East of SP&R</u> going through CA, Tunstall and ultimately Snape (B1069) do not have sufficient safe capacity to cope with additional and cumulative volume increases, especially as the <u>B1078 East</u> has over eight width restricting pinch points, which impede safe passing of oncoming vehicles. 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 address it through the Transport Review Group.
3.	Transport Strategy relating to Associated Development Sites	
	Two Village Bypass – Implications for possible Four Village Bypass;	• The Local Transport Plan recognises that there are long-standing traffic volume issues affecting Marlesford, Little Glemham, Stratford St Andrew, and Farnham. 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. • 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 Two Village Bypass (TVB) is likely to encourage further traffic on the A12, which will itself have further negative impacts on Marlesford and Little Glemham and subsequently for parishes along the B1078/A1152 /B1069 (‘alternative routes’)

		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.
	Freight Management Facility - Alternatives and access arrangements	Capacity issues of the A14 Orwell Bridge, compounded by a general increase of volumes linked to other larger developments, remain a concern.
4.	Transport Assessments approach and modelling	
	Early years traffic modelling	No comments
	Seasonal traffic effects	- CA and surrounding parishes remain highly sceptical regarding traffic modelling and assessments, especially during seasonal peak times. - East Suffolk is a major agricultural producing area as well as a holiday destination. The agricultural traffic is the heaviest from June to October each year, often causing already problems on the smaller roads and lanes, especially around the B1078 (Campsea Ashe/Tunstall) and the A1152 / B1069 (Eyke/Rendlesham/Tunstall), as the traffic is mainly linked to the Bentwaters (Rendlesham) agricultural distribution centre. <u>Tractor / trailer traffic already causes regular delays on the A12 and will become more frequent and prolonged.</u> <u>CA does not believe that traffic modelling is truly representative of the likely impacts.</u> - All traffic (both local and tourist) is likely to be affected by the associated development on the A12, including “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. - The industrial estate on Bentwaters at Rendlesham is already a main local concern regarding sustainable traffic volume on small country lanes and roads. That concern is shared by SCC Highways. <u>Bentwaters has developed into one of the largest agricultural distribution sites in the UK, and its traffic affecting the A1152, B1078, B1069 and the A12, peaking in September with over 5380 HGV movements (data Sept 2019) .</u> Bentwaters also hosts several Anaerobic Digesters, which require regular ‘feeding’ and maintenance that involve large amounts of tractor, HGV and tanker movements, as the feeding material is harvested from fields and waste materials delivered (to) within ca 10 miles of the Bentwaters location.

		• Additionally, Bentwaters might even host numerous of the expected subcontracting companies, which are not subject to monitoring by EDF and will further impact local road infrastructure • <u>A Joint Parish Traffic Initiative of eight Parishes is currently engaging with SCC and ESC in trying to set long overdue limits to the traffic emanating from the Bentwaters area, as it is already breaching set HGV limits on several month a year (during harvest season, actual data from 2019). The creation of such joint initiative is testament to an already precarious traffic situation in the area. SZWC related traffic (direct and indirect) will only compound the effect on the B1078 and A1152.</u> • 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 from minor roads in the Marlesford/Campsea Ashe/Hacheston area, particularly if right-turning. This issue is becoming compounded during holiday & agricultural seasons.
	• Buses	• 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. • CA together with other Parishes insist, that <u>all</u> buses used by the Applicant and its contractors should be electric..... the Applicant is, after all, an electricity company.
	• Park and Ride sites traffic modelling	• We share great concerns with other Parishes, 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.

**Issue Specific Hearing 3 (ISH3) Traffic and
Transport (Part 2)**

Date: Thursday 8 July 2021

Agenda Item	Topic	Campsea Ashe Comment
2	Transport Assessments approach and modelling (continued from Wednesday if required)	See comments under Wednesday (above)
3	Monitoring and Control Mechanisms for Traffic and Transport	
	• Early Years controls in the DCO	• 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. • Rat running is a major concern for parishes along the A12, and there is a grave concern this is not sufficiently addressed by the applicant, as it seems to be viewed as a ‘non-SZWC’ matter. That the traffic impacts are worsening as a result of the SZW works needs to be expressed and mitigated more forcefully. We agree with Marlesford, that SCC are being insufficiently robust in seeking solutions to what could become a major aggravation to local communities. 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.” (see also 2. Freight Management. Movement of freight by Road) • Campsea Ashe, together with several other neighbouring PCs’s, especially Snape and Tunstall, are concerned that the B1078 and B1069 will face particular problems with rat-running. That problem will be compounded if Bentwaters is used as a distribution point for sub-contracting and/or materials destined for the SZC and EAN01/02 development sites. (as outlined at 4. Transport Assessment approach & Modelling) • Campsea Ashe, Tunstall, Snape, Marlesford & Pettistree, fear that their local lanes will increasingly be used by drivers avoiding congestion on the A12 and in Wickham Market.

		• 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. • <u>Parishes remain seriously concerned about monitor & control of non HGV movement from the beginning of the project together with the lack of realistic enforcement mechanisms that can address the issues quickly.</u>
	• Construction Traffic Management Plan	• We are 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. 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 east & west of Wickham Market) should be done. • We again refer to our concern re sub-contracting companies and their associated vehicle movements that are currently not subject to any monitoring. • CA shares Marlesford's position on engine specification for HGVs serving any of the Applicant's construction sites; 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" is the most environmentally sustainable option if the Councils are seeking to minimise air pollutants. • Campsea Ashe as a PC immediately affected by the project is concerned about the effectiveness of the Transport Review Group. Those PC's who will most likely experience immediate issues relating to transport, should have a direct accessible link to the main stakeholder, the Applicant as well as Highways.
	Traffic Incident Management Plan	• We strongly suggest to include all vehicles in the TIMP process, otherwise the local 'alternative route' network will get totally congested, particularly if a B1078/B1069 diversion has been put into action. • CA and other Parishes have 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.
4.	Consideration of local transport impacts	
	• Difference in proposed mitigations identified in the Transport	• CA shares Marlesford's position on engine specification for HGVs serving any of the Applicant's construction sites - insisting that all HGVs should be Euro VI compliant with no percentage minimum as

	Assessment and those required by the Councils	seems to be suggested by the two local authorities. "All Euro VI compliant" and all electric buses is the most environmentally sustainable option if the Councils are seeking to minimise air pollutants. • <u>The utterly necessary provisions of footways, pedestrian crossings, quiet surfacing and speed restrictions with regards to the A12 through Marlesford and Glemham will in fact add to A12 delays and congestions and CA is not reassured that has been appropriately reflected in assessments and modelling.</u> • It is important that all mitigation measures are delivered by the Applicant at the earliest opportunity. Early delivery will help to lessen the adverse impacts and do so with the least disruption to the highway network. • CA is very disappointed that mitigation measure with regards to the eastern B1078 / B1069 are currently not being addressed adequately, and hence are not included in any S106 agreement nor any Deed of Obligation.
	• Consideration of cumulative impact on local roads of the Proposed Development and the Scottish Power applications	• CA disagrees strongly with the applicants on the detail of impacts and negative outcomes, especially re journey times, 'alternative routes' (rat-running, as referred to above) and subsequent economic impacts. Like other PC's, we find the assessments seem not to reflect reality, residents experiencing already worsening congestion at peak times/hours, even before the larger energy projects (EN01-02 & SZW2), as well as numerous other larger residential and commercial developments in the area, have begun. The assessments of increased journey times in the area (1%-2%?) seem highly 'optimistic' and journey times will further increase when mitigation measures, such as speed limitation measures on the A12, pedestrian crossings, etc., are put in place. We severely doubt, that those issues been properly taken into account. <u>CA is currently not convinced proper assessments of the developing situation has been taken into account sufficiently and would regard in-combination effects – once all residential developments are included - higher than the stated 'moderate adverse'.</u> • <u>We also noted with concern that traffic modelling appeared to have only been undertaken up to the A12/A1152 intersection, leaving a void of realistic forecasting in our local area, upon which one could base better planning decisions</u> • Marlesford & CA agree 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, <u>which is a significant effect.</u>
		Campsea Ashe , 20 th July 2021