

# Middleton-cum-Fordley Parish Council

## Issue Specific Hearing 3: Traffic and transport

### Post-hearing submission

20th July 2021



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#### 1. Introduction

Middleton cum Fordley Parish Council (MCFPC) was represented at Issue Specific Hearing 3 on July 8th 2021 by Julian Cusack, the Chair of the Council.

At the hearing we made representations on three issues:

1. Governance of the Transport Review Group (TRG)
2. Incident management with respect to congestion risks on minor roads in the Middleton area ('rat running')
3. The severance impacts of the proposed Sizewell Link Road in relation to transport and traffic issues

In this document we expand on the points made at the hearing and provide additional representations in relation to the impact of the SLR.

#### 2. Governance of the TRG

##### Background

The following text is extracted from the Applicant's document APP-607 (Traffic Incident Management Plan (TIMP)) for ease of reference.

" **3.2.1** A transport review group (TRG) will be established with members taken from the key transport stakeholders and SZC Co..

**3.2.2** The scope of the TRG in relation to the **TIMP** is proposed to be as follows:

- receive transport monitoring reports from SZC Co. relating to the implementation of the **TIMP**;

- monitor the implementation and effectiveness of the **TIMP**;
- consider the case for, and approve amendments to the **TIMP**;
- consider the use of the Transport Contingency Fund if issues relating to incident management need to be addressed;
- advise SCZ Co. on potential enhancements to the **TIMP**; and
- consider the views and opinions of the transport and traffic groups.

3.2.3 The TRG will have further duties with regards to the **CTMP** and **CWTP**<sup>1</sup>, which are set out in those documents.

3.2.4 The TRG members would comprise:

- the transport co-ordinator;
- one representative to be nominated by Suffolk County Council (SCC);
- one representative to be nominated by Highways England;
- one representative to be nominated by East Suffolk Council (ESC); and
- two representative, in addition to the transport co-ordinator to be nominated by SZC Co..

....."

The TRG is clearly intended to have a major role in the management of Sizewell related traffic over a wide area and it is likely therefore that affected communities such as Middleton cum Fordley will be looking to it to try and limit adverse impacts whether from normal traffic flows or following traffic incidents such as accidents on the A12.

The governance arrangements for the TRG are therefore of concern.

In this respect we note that because the transport co-ordinator will be appointed by SZC the voting rights will be equally split between the applicant with three votes and the other three members.

In our opinion this gives a low level of confidence that decisions will be made, and actions taken that may be of considerable benefit to local people but difficult or expensive for the applicant.

We request therefore that the governance arrangements be reviewed to improve transparency and scrutiny by requiring that its meetings be held in public under arrangements like those which apply widely to local authority Council and Committee meetings.

We noted that this request was supported at the Hearing by Theberton and Yoxford Parish Councils and we were disappointed with the Applicant 's response which was that they considered publication of minutes to be sufficient and had no plans to hold the TRG meetings in public.

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<sup>1</sup> Construction Traffic Management Plan and Construction Workers Transport Plan

## 2. Rat running

Several Parish Councils represented at the hearing raised concerns that a traffic incident could lead to vehicles seeking alternative routes using minor roads in the area.

This already happens from time to time with the current road configurations and traffic levels.

An example of this was provided by one of the residents of Fordley Road, Middleton who wrote as follows in respect to an incident resulting from an accident on the A12 on July 3rd 2021.

The photo is one of many taken this morning due to a rat run caused by an accident near Yoxford on A12 and provides clear evidence Fordley Road residents and any type of services would be unable to access their properties. This is a major health and safety and work issue concern and cannot be allowed to happen.

It would be appreciated if this information is forwarded to PINS at the appropriate time by Council's.



At the hearing the applicant responded by saying that their traffic management plans would prevent Sizewell C related traffic using minor roads such as Fordley Road.

There is some scepticism on this point, but at the hearing we made the following observation:

"Whether deliberately or otherwise, I don't think the spokesman for the applicant properly understood or responded to the point about rat running through the minor roads leading north of Saxmundham through Kelsale to the B1122 and the SLR. We understand that those

would not be permitted routes for Sizewell C workers. Our point though is that when there is an incident on the A12, non-Sizewell related traffic would also be involved. And we are concerned that that would exacerbate the existing problem of rat-running through those routes, because of the overall increased level of congestion caused by the Sizewell C project. And I don't feel the applicant properly took on board that point."

We note that the Inspector leading the questioning at this point did press the Applicant for a further response which was effectively an acknowledgment that the management of non-SZC traffic in an incident would be a matter for the County Council and the Police.

While we understand this response, we would like assurances that a holistic approach to incident management will be in place with adequate resources available to the County Council and the police to manage such incidents, working with SZC.

In relation to Fordley Road, which we assess as the road in our Parish most likely to be adversely affected, we request that if it is to be stopped up on the north side of the SLR as currently proposed that it should also be stopped up on the south side. This would eliminate any prospect of rat running past the 5 properties located on Fordley Road.

### 3. Severance issues

In May 2021 members of the Parish Council went door to door asking Middleton and Fordley residents what they thought about Sizewell C and the proposed Sizewell Link Road (SLR).

We got responses from 138 individuals which is about 44% of the total on the electoral register.

The results are set out in in Appendix 1.

The clear messages based on majority views (over 70%) are:

- opposition to the construction of a new nuclear power station at Sizewell
- support for a relief road if SZC does go ahead and for this to be in place before construction starts
- opposition to the proposed route of the SLR, with many expressing a preference for a route leaving the A12 further south
- strong support if the SLR does go ahead for more off-road pedestrian and cycling provision along the B1122 and B1125 and for traffic calming measures.

Opposition to the proposed route for the SLR derives from concerns about the resulting 'severance' of the Parish.

This has at least three consequences of concern:

1. The blocking under current plans of the 'minor road' routes to the south, which are used by many residents to access Saxmundham and beyond
2. The disruption of farming businesses from the loss of land to the road and the blocking of access routes, causing increased costs of working
3. The intrusion of the SLR into the landscape and the physical divide it will make between Fordley and Middleton.

Recognising that this hearing was about transport, we explained our concerns about the proposed stopping up of Littlemoor Road as one example of the difficult choices being forced on us by the proposed SLR.

Littlemoor Road currently has limited vehicular traffic. Use for amenity purposes by pedestrians, runners and cyclists has been increasing and this is a trend the Parish Council supports - for example by its proposal that the road be given 'Quiet Lane' designation and by an agreement with the Highways Authority to delay cutting the verges.

Under the current plans, Littlemoor Road which goes roughly south from the B1122 in the direction of Kelsale is proposed to be stopped up, both on the south side and on the north side. And in the latest iteration of the applicants' proposals, there is proposed to be a new right of way created, for pedestrians and cyclists, which will initially take a route to the west crossing the Middleton link road. It would then require the cyclist who has already had to wheel their bike across one main road, or the walker to dodge the traffic at sixty miles per hour on one main road, to then cross the SLR itself from north to south before eventually making their way back to the existing Littlemoor Road to continue their journey into Kelsale.

We had a meeting recently with representatives of the Applicant and I asked them what provision was going to be made for the safety of pedestrians and cyclists? They confirmed that there were no current plans to provide protection by way of zebra or pelican crossings, central refuges, or foot bridges. This response applies to the double Littlemoor Road crossing and also to other points along the SLR where diverted rights of way are requiring walkers to cross the road with little protection other than signage from fast moving traffic.

It is totally unacceptable that the current proposals will require pedestrians and cyclists to dodge across traffic moving at 60 miles per hour on the Middleton Link Road and the SLR. We have used this as an example because the same issues apply quite commonly along the route of the SLR and in other parts of the routes to and from the Sizewell main site.

Appendix 2 comprises our note of the meeting with the applicant referred to above. This records details of many other concerns resulting from the proposed severance of Middleton from Fordley by the SLR. As of the date of this document we are still awaiting to hear back on the agreed action points.

## Appendix 1: Survey results

Middleton Parish Council: Residents Survey May 2021				
Green = over 70% said 'yes'. Red = over 70% said 'no'. Amber = yes and no both less than 70%**				
Question	RESPONSE		YES	NO
1. Do you think SZC should be built?	91%	Red	15%	85%
2. Do you think a relief road is needed to reduce traffic through Middleton Moor?	94%	Green	88%	12%
3. Do you think the relief road should be on the route proposed by EDF?	87%	Red	28%	72%
4. If the Sizewell Relief Road (SLR) is built on the proposed route, do you think it should be permanent?	80%	Amber	61%	39%
5. Do you think construction of SZC should be deferred until the SLR is built?	97%	Green	93%	7%
6. Do you regularly use any of the following roads to get to Saxmundham?				
Pretty Road	99%	Green	79%	21%
Hawthorn Road	98%	Amber	39%	61%
Fordley Road	98%	Green	78%	22%
Littlemoor Road	95%	Amber	59%	41%
7. Would you support the provision of a bridge to take Pretty Road across the SLR?	85%	Green	93%	7%
8. Would you support the provision of a bridge or underpass to take Fordley Road across the SLR?	75%	Amber	55%	45%
9. Would you accept that Fordley Road be closed to motor vehicles if Pretty Road was kept open?	81%	Amber	56%	44%
10. If Fordley Road is closed to motor vehicles, would you be likely to use a footbridge over SLR?	81%	Amber	69%	31%
11. If vehicle access south to Saxmundham is maintained along Pretty Road and/or Fordley Road, would you accept the closure of Hawthorn and Littlemoor Road?	75%	Amber	67%	33%
12. Do you support a request to provide off-road pedestrian and cycling routes along:				
The B1122 from Middleton Moor to Mill Street?	95%	Green	89%	11%
The B1125 from Westleton to Black Slough?	95%	Green	85%	15%
The B1125 from Black Slough to Rectory Road?	95%	Green	92%	8%
The B1125 from Rectory Road to the junction of B1122? *	91%	Green	80%	20%
13. Would you support traffic calming measures on the B1125 and B1122 to reduce the incidence of speeding etc.	94%	Green	98%	2%
14. Specifically, would you support a 30mph speed limit on the B1125 between Westleton and Middleton?	95%	Green	95%	5%
15. Do you think the B1125 should be linked with a new section of road to the SLR?	75%	Amber	56%	44%
Notes:				
Survey results were obtained from 138 individuals at 102 addresses.				
These comprise 44% of the individuals and 60% of the addresses in the Parish.				
Not everyone answered each question. The response rate shown for each question is the proportion of the 138 individuals surveyed who answered that question.				
The percentages shown for yes and no are calculated on the total of those who answered the question.				
The surveys were carried out between 12th and 25th May 2021.				

## Appendix 2

### NOTES OF THE MIDDLETON CUM FORDLEY PARISH COUNCIL AND EDF ENERGY MEETING ON MONDAY 5<sup>th</sup> JULY 2021 AT 3:30 PM

#### 1. Attendees

##### Middleton cum Fordley Parish Council

Cllr. Julian Cusack (JC)

Sharon Smith – Clerk

##### EDF Energy

Tom McGarry (TMcG) – Head of Stakeholder Engagement

Richard Bull (RB) – Head of Transport Planning

#### 2. Minor Changes Consultation

##### Middleton Link Road Roundabout

- JC – concern expressed about the ease of access approaching the roundabout from the east against the flow of SLR traffic from Yoxford and waiting for a gap for a long time. Asking for consideration for a traffic light system with a sensor to give priority to residents.

- RB – we are not anticipating the SZC flow to be so significant to interrupt access for residents. Workers will be transported by bus and the majority of traffic will come from the south so will not be accessing that junction. We will check the traffic modelling to ensure there is no problem. There is a downside to traffic lights during the evening and weekends which will be detrimental to people trying to get around efficiently.

**ACTION: EDF to provide the forecast traffic modelling data to allay concerns.**

- JC – to the west there is a hatched green area and an attenuation pond, what will that area look like? Is it flat or does it have a gradient? Why is it shown as grassed instead of planted?

- RB – the hatched area is a proposed temporary compound during the construction phase. At the end of construction it is just shown as grassed rather than detailed landscaping. We could be open to landscaping this area if it is key to stakeholders. The land take will be larger during construction but the permanent land take will be smaller. We can provide detailed land plans to give you clarity.

- TMcG – the red line shows the land required for the compound for the contractors to build the SLR but the indicative compound area will no longer be required when it is built. The attenuation basin is for drainage. We can look at a detailed landscape design.

- JC – will the land in the red lines be sold to EDF? After construction is complete will it be retained by EDF or returned to arable land?

- RB – this will be set out in the land plans.

**ACTION: EDF to provide land plans to show the temporary and permanent land take west of the Middleton Link Roundabout.**

##### Littlemoor Road

- JC – the proposals show the road leaving the B1122 heading southwest, straight, then a bend, then a wooded area, then it will meet the SLR and be stopped at that point. Why stopped there and not further north? What is the purpose of keeping it open so far which will allow vehicles to run along there? Will there be a turning circle?
- RB – there will be a turning head. The purpose of keeping it open as far as possible is to maintain the public rights of way for pedestrians and cyclists. There is no ability for vehicles to cross the SLR.
- JC – would it be worth considering closing it to vehicles after Norwood House (shown on EDF map as Yankee Lodge) so that it remains a public right of way amenity and access for farm vehicles. We have concerns about fly-tipping and other nefarious activities if it is open so far.
- RB – we are happy to discuss this with SCC Highways and come back to you.  
**ACTION: EDF to discuss place of stopping up Littlemoor Road with SCC Highways and whether there is merit in closing the road to private vehicles.**
- JC – from the stopping up point, the cycle/footpath access is along the existing road and then cyclists would need to walk their bikes across the Middleton Link Road and again over the SLR, if there is a gap in the traffic, to continue on the footpath. Why are you introducing a double crossing when there was only one crossing before?
- RB – this is a highways safety issue to maximise visibility given the proximity to the junction with the Middleton Link Road.
- JC – are you saying it is safer to cross two busy roads instead of one?
- RB – it is safer now than the previous proposal.
- JC – we have huge concerns about the closing of the road to pedestrians and cyclists. The Quiet Lanes initiative is to encourage cyclists and pedestrians, which are increasing over the years, and this new route with its double crossing looks very problematic. We will speak against this at the Issue Specific Hearings.
- RB – we will double-check the reasons why this change has been proposed and come back with a detailed explanation as to the configuration.  
**ACTION: EDF to provide detailed reasoning for double crossing and safety elements.**

#### Pedestrian/Cyclist Crossings

- JC – what will the signage look like for crossing the Middleton Link Road and the SLR? Will there be zebra crossings? What protections will there be for pedestrians and cyclists?
- RB – there will not be any crossings. There will be public rights of way signage. We are keen to feed into the legacy of the B1122 which will have a different function. We will ensure the infrastructure of the lanes is linked as much as possible and signed so that they provide a purposeful route for pedestrians and cyclists.
- JC – why can't we have a pelican crossing?
- RB – we think the speed of the road precludes this as vehicles will be traveling at 60 mph.
- JC – so I have to wheel my bike through 60 mph traffic?
- RB – yes.
- JC – would you consider providing pedestrian bridges?



- RB – it would depend on the footfall. We have not particularly considered bridges but we understand your position. Littlemoor Road would attract more pedestrians/cyclists but a bridge is not part of our current proposals.
  - JC – we want to encourage walking and cycling as it is beneficial to well-being and health. There are very useful routes through to Kelsale and Saxmundham and severance is regarded as very serious to this parish. Why can't we have a central refuge or crossings or bridges? We would like some explanation.
  - RB – we are starting to scope out the Cycling Connectivity Fund so perhaps bridges could work. A link from Middleton to Fordley to Kelsale to Saxmundham would be a good legacy to deliver. We cannot commit but we can look at.
- ACTION: EDF to consider providing pedestrian footbridges.**

### Fordley Road

- JC – the junction to the SLR on the south side is controversial with many of our residents. Why is there a junction to the SLR?
- RB – in the early consultation stages we proposed to stop up Fordley Road and keep Littlemoor Road open. In stage 4 we changed approach to keep Fordley Road open to allow residents to use the road to maintain connectivity. If both Fordley Road and Littlemoor Road are closed it increases severance.
- JC – there are 5 properties in Fordley Road on the south side of the SLR, we note that 3 of the 5 households want Fordley Road kept open throughout and many back the proposal of an underpass made by one of the landowners. What are your views?
- RB – we worked up a design to understand the footprint. There are a number of challenges. The road is 1.5 metres above the current level of Fordley Road to deal with the flood risk as we would need to divert the watercourse and enhance the culvert. Creating an underpass is also challenging and not likely to be compliant with a flood risk assessment. A bridge would be 6-7 metres above the level of the existing road and would then need to go into a cutting at the back of Oak House. The embankment at Middleton Moor would be 200 metres long. The visual impact and the flood risk mean this is something we could not promote and it would not be a better outcome than we currently present. The current proposal is the most appropriate scheme.
- JC – the consensus of the residents of Fordley Road is that the junction will create rat-running. If there is congestion on the A12 to the south, then sat navs will send traffic through Kelsale via Tiggins Lane or Butchers Lane and along Fordley Road. There are traffic jams with the existing levels of traffic and with the increased SZC traffic the rat-running potential with this junction will be exacerbated.
- RB – there would be no benefit to join the SLR at the point where Fordley Road joins the SLR rather than taking the SLR. Understand if there is an accident on the A12 though.
- JC – I am not talking about during the ordinary course of business. The concern is if there is an accident on the A12. Rat-running already happens and this will be exacerbated by SZC traffic numbers.
- TMcG – in a road traffic incident, the whole system needs to be considered. There will be a freight management facility south of the A12. If there is a RTI, HGVs

will be stopped there. The construction site will also have a major HGV park so these vehicles would not be released. There will be a Traffic Incident Management Area at Wickham Market/Hatcheson. The park and ride strategy will retain additional traffic and if an RTI happens during a shift change then workers will be held at the park and ride sites until the incident is cleared. The management of EDF traffic is actually to combat rat-running.

- JC – how will an incident on the A12 be communicated?
- TMcG – HGV drivers will communicate. Also messaging from the police and other stakeholders.
- RB – our strategy is to get workers on buses and HGVs could not use Fordley Road in any event.
- JC – our residents are not concerned with SZC traffic. They are concerned with non-Sizewell related traffic rat-running.
- TMcG – you need to alert SCC Highways to this as an existing issue. We are trying to ensure we do not make an existing situation worse. Linkages are not there to incentivise rat-running and the wider traffic management system will manage SZC traffic.
- JC – the junction could be removed to stop rat-running.
- RB – we need to balance maintaining connectivity re sporadic incidents.
- JC – the traditional routes into the village are via Mill Street and Moor Road. People going to Saxmundham for shopping will probably find it faster to go via Pretty Road. I am not sure that the connectivity is that great. People are not going to use Fordley Road, the Middleton Link Road and the SLR to go to Kelsale. Many residents have accepted that they can use other routes.
- TMcG – do you want no link at all?
- JC – many of our residents' preferred option is for an underpass to keep Fordley Road open both ways. The second preference is to stop up Fordley Road north and south as there is an incentive for non-SZC traffic to rat-run through Fordley and Kelsale.
- JC – what are you proposing to alleviate noise and pollution for residents of Oak House in Fordley Road?
- TMcG – we are working directly with them and having meetings about their land and mitigation measures.
- JC – we are also concerned about the point where Fordley Road will be stopped up and the potential for fly-tipping and other criminal activities. Is it worth keeping it open or would it be better to cut it off at the B1122?
- RB – there needs to be access to the attenuation basin through the north section of Fordley Road and also farm access north of the SLR as it moves east. There will be a turning head but it will not be stopped up closer to the B1122.
- JC – will there be 'Access Only' signage?
- RB – yes.

**ACTION: EDF to consider the pros and cons of the southern access and look at the request to have no link.**

### Trust Farm

- JC – there is concern about the road linking the farm to the SLR. Will it be a public highway leading to the farm and its valuable assets?

- RB – the link road back to the B1122 will be a public highway but not the road to the farm.
  - JC – what will stop vehicles using this road?
  - RB – it will be a private road and signed appropriately. It may be a gravel road but this is subject to discussions and agreement with the landowner. The final design and detail has not been completed.
    - TMcG – I will raise this with the land agents.
- ACTION: EDF to raise concern with the land agents.**

### Hawthorn Road

- The residents of one of the properties in Hawthorn Road very near the route of the proposed SLR have informed me that red deer migrate through the piece of woodland there to Minsmere for breeding in the autumn/winter. Can you check your ecologists have this information and have taken it on board?
- TMcG – yes.
- JC – have you engaged with the residents of the residential and farm properties on or accessed from Hawthorn Road?. I recommend you engage individually with all these residents to ensure they have understood and taken on board the implications of the stopping up of Hawthorn Road on the north side and its junction with the SLR on the south side. They also have concerns about the environmental impacts.

**ACTION: EDF to ensure ecologists aware of red deer migration route and write to residents.**

### B1125 Link to SLR

- JC – this linkage is controversial in the village. What are the arguments for it?
- RB – our view is not to encourage traffic down to that link to SZC. We will encourage traffic to go down the A12 to the northern park and ride. In design terms, the link to the B1125 was extended for a legacy perspective and to unlock potential for cycling connectivity. It is a better scheme really. We understand concerns about more traffic but this is not expected due to the park and ride site and the exercise of buses for workers.
  - JC – it may not be SZC traffic disobeying the rules but it will provide a route for non-SZC traffic to access Leiston from Blythburgh. There is scepticism that SZC workers will obey the rules but this is not the point I am making.
  - TMcG – there is no parking on the construction site and there will not be many LGVs travelling down from the north.
  - JC – what about workers travelling to the accommodation campus and caravan park?
  - TMcG – workers coming from Blythburgh/Lowestoft/Great Yarmouth will use the park and ride. This is the strategy to prevent rat-running. For those staying at the accommodation campus, they will come from further afield and will use the A14. We will monitor this, via the s.106, and if we see it happening we will put in mitigation to stop it.

TMcG recapped the agreed actions.

JC said the Council supports the proposed bridge at Pretty Road and that the Council's survey showed that Pretty Road was the most used of all the minor roads to access Saxmundham therefore it was the best route to keep open.  
The meeting closed at 4:30 pm.