



# **Marlesford Parish Council**

## **Response to East Suffolk Council Consultation on: Draft Cycling and Walking Strategy 2021**

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## 1. Summary

- Marlesford Parish Council (MPC) is arguing for a new combined pedestrian and cycleway between Marlesford and the Sizewell C (SZC) Southern Park and Ride at Hacheston. The new path would connect to the proposed path from Wickham Market to the Southern Park and Ride.
- We ask for East Suffolk Council (ESC) to support the provision of a new pedestrian and cycleway by including it in their emerging Cycling and Walking Strategy.
- Rural communities lag behind their counterparts in urban areas in having easy access to safe active travel facilities. We ask ESC to recognise this and address a real need for this rural community.
- The existing path is unsafe for use by pedestrians and unusable by cyclists. We therefore argue for the new path on the grounds of improving the safety of vulnerable road users.
- We argue that the potential increase in traffic resulting from the cumulative impact of SZC and energy developments in the Friston area will make the provision of a new path essential and its funding should come from the energy project developers.
- We require the path to be appropriately surfaced to allow its use by wheelchair users.
- MPC wants to promote the health benefits of active travel and we also recognise that the provision of a new path will contribute to fewer car journeys.

## 2. Introduction

MPC welcomes the opportunity to comment on ESC's Draft Cycling and Walking Strategy 2021 and supports the broad principle behind enhancing access to active travel opportunities with the aim of improving health and wellbeing and reducing car journeys. We have provided some comments in the on-line consultation document (see Appendix 2), but this submission should be taken as our comprehensive consultation response.

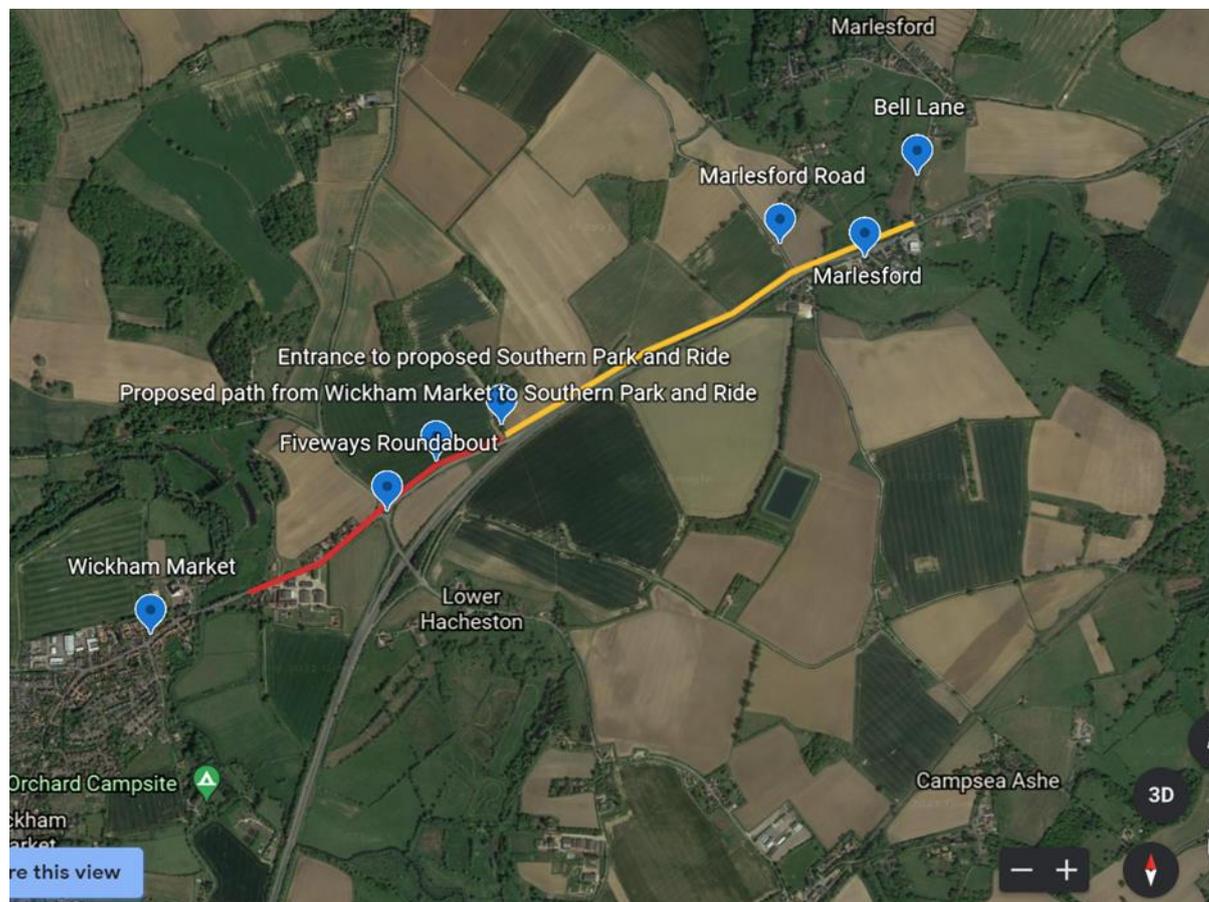
We will argue below for a new pedestrian and cycleway to be constructed between Marlesford (Bell Lane) and the entrance to the proposed SZC Southern Park and Ride at Hacheston.

Marlesford lies 2.7 miles northeast of Wickham Market which is Marlesford's nearest service centre and provides supermarket, post office, doctors' surgery, library and other amenities all of which are regularly used by our residents. The A12 dual carriage bypass of Wickham Market ends to the southwest of Marlesford at which point the A12 becomes single carriageway. The A12 severs Marlesford village with part of the community situated to the north of the A12 and part to the south.

There is an existing path (which is incomplete) which runs from Marlesford towards the Fiveways roundabout (junction of B1116 and B1078) – the path is on the northwest side of the A12, adjacent to the carriageway. The path is not continuous, is narrow, overgrown and so close to the carriageway that it is considered to be dangerous.

Because of a revetment which would prevent widening of the existing path, MPC is arguing that the only option is for a new pedestrian and cycleway to be created on the northwest side of the existing path behind the existing hedge. The land required for the creation of the path is outside Highways ownership and the Parish is about to enter into talks with the landowners in order to secure commitments to provide the land required for the new path.

**Figure 1. Route of Proposed Pedestrian and Cycleway from Marlesford to Southern Park and Ride and Ride.**



**Red route** shows part of the proposed EDF-funded pedestrian and cycleway from Wickham Market to the entrance to the proposed Southern Park and Ride.

**Yellow Route** shows the new pedestrian and cycleway from Marlesford (Bell Lane) to the entrance to the proposed Southern Park and Ride.

Photographs of the existing path are included at Appendix 1.

### 3. Policy

We note the weight of policy at national, county and district level designed to encourage active travel and produce a modal shift from car usage. We are encouraged to note Policy SCLP7.1 in the District's local plan which states "Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities." We would ask ESC to support the provision of a new pedestrian and cycleway as part of the mitigation measures to be delivered by EDF in Marlesford and Little Glemham.

We also welcome Transport East's report on Active Travel Strategy which was published at the end of October 2021. The Parish Council is particularly encouraged by Transport East's statement that it "has ambitions to propel Active Travel across the region; extending the bold vision described in Gear Change (UK Government's vision for walking and cycling) beyond urban areas to people in market towns, coastal communities and local neighbourhoods." We endorse the principle of ensuring that local neighbourhoods and particularly rural communities, are as well served by pedestrian and cycling infrastructure as the communities in urban areas.

We note that many of the policy statements recognise the health benefits (as well as the reduction in car journeys) that result from access to well-integrated active travel facilities. The health benefits of active travel are recognised in Suffolk County Council's (SCC) Suffolk Local Transport Plan 2011-2031 Part 2 - Implementation Plan, but we lament the fact that so much emphasis is put on urban schemes and not enough focus is directed towards rural active travel.

#### **4. Current Situation**

As stated in the Introduction above, Marlesford currently has a narrow and incomplete path running from just west of Marlesford Road in Marlesford, southwest towards the Fiveways roundabout and Wickham Market. We argue that because of the narrowness of the path, it is dangerous and therefore not fit for purpose. This appears to be recognised by ESC in its response to Community Recommendations from its Initial Cycling and Walking Strategy Consultation (October – December 2020). Councillor Dr Roger Waterfall made recommendations which have been numbered 305 and 459 in the current consultation document. Against both items (under the safety heading) ESC states "This section of the A12 is a busy 'A' type road with a national speed limit and appears to be often utilised by HGVs. Despite this section of the A12 having an existing small footway adjoining the NW side, removing cyclists and pedestrians away from the road will have considerable safety benefit. A score of 3 is deemed reasonable." We entirely endorse this view as one of our major concerns about the current path is its safety.

The A12 (particularly the single carriageway stretch through Marlesford) is not safe for cycling and the existing path is too narrow and close to the carriageway to allow use by cyclists. In addition it is overgrown.

We have stories of parents pushing pushchairs along the existing path in order to get to Wickham Market. This is extremely dangerous as the path is so close to the carriageway that the air displacement from passing HGVs and buses could lead to a serious accident.

Both ESC and SCC acknowledge the problem in their Local Impact Report (LIR) to the Planning Inspectorate regarding SZC where they say at Para 17.33 "Marlesford has been identified by the Councils as a location of particular concern with regard to increased severance, fear and anxiety of vulnerable road users and reduced amenity."

## 5. Impact of Nationally Important Infrastructure Projects

In May 2020 NNB Generation Company (SZC) Limited submitted its Development Consent Order (DCO) application to the Planning Inspectorate. MPC fully engaged with the examination process and has consistently argued, in its various representations, the need for improved cycle and pedestrian connectivity between the village and Wickham Market. There is a need now, but it will become even greater if the SZC project goes ahead as the project will introduce up to an extra 1,000 HGV and bus movements per day on the A12 through Marlesford. The Marlesford submissions which cover active travel can be found in the PINS Document Library under the following references:

[REP2-365]

[REP5-237]

[REP5-238]

[REP6-065]

[REP7-207]

[REP10-333]

We are hugely disappointed that EDF has not been required to include a new pedestrian and cycleway between Marlesford and the Southern Park and Ride. They argue that it would not be proportionate for them to provide such a path and even if they were minded to create a new path, they regard the required land being in private ownership as an obstacle. We completely disagree with EDF on these issues and argue that the level of fear and intimidation currently experienced by Marlesford residents as a result of traffic on the A12 (let alone the adverse impacts from the SZC and other energy project traffic in the future) justifies the provision of a path, and the fact that land is in private ownership should not be seen as an insurmountable barrier to delivery.

At Annex L of the Draft Deed of Obligation (Construction Worker Travel Plan) at Para. 4.2.6 the Deed refers to “a Wickham Market Scheme to fund pedestrian, cycle and public realm improvements in Wickham Market; and a Little Glemham and Marlesford Scheme to fund improvements for vulnerable road users in Little Glemham and Marlesford;” We welcome the A12 mitigation measures already agreed with EDF for Marlesford (and Little Glemham) but argue that they do not go far enough as they don’t include the requested pedestrian and cycleway.

We are also unsure that EDF has enshrined in the Deed of Obligation (DoO) their commitment to a Cycle Connectivity Fund, as requested several times by SCC.

The Joint LIR (PINS Library Ref [REP1-045] submitted to PINS by ESC and SCC, is supportive of active travel measures as both mitigation for adverse impacts caused by increases in traffic resulting from the cumulative impact of SZC and other energy projects, and as legacy benefits once the energy projects have been completed. In addition to the comment quoted from Para. 17.33 under Current Situation above, the same paragraph goes on to say “The Change submission assessment considers that during the peak years amenity reduces as a result of the changes. Where it increases the impact on severance, mitigation is proposed in the form of a shared footway/cycleway thus reducing the effect on severance to not significant. The Councils will expect this mitigation to be incorporated in revised work plans.”

But in response to the Councils, EDF said “In Marlesford the effect on fear and intimidation increases, however the transport assessment addendum [AS-266] considers the overall effect to be minor adverse - not significant”. ESC and SCC do not agree with this assessment - as noted in the transport section (paragraph 15.103) [of the LIR]. Marlesford has been identified by the Councils as a “location of particular concern with regard to increased severance, fear and anxiety of vulnerable road users and reduced amenity.” We agree with this assessment by the local authorities but are very disappointed that the recognition of the adverse impacts that will be experienced by Marlesford have, as yet, not resulted in a commitment from EDF towards the proposed pedestrian and cycleway.

It is clear from 18g in Table 18 of the LIR that the Councils intended that EDF would provide cycling and pedestrian infrastructure for Marlesford as well as Wickham Market in order to connect with the Southern Park and Ride. At 18g the Councils say that they require “Improvements of footway and cycling infrastructure linking the site to Wickham Market and Marlesford for [access to] the Southern Park and Ride, if provided (by which we understand the Councils to mean “if constructed”). Under the same line in the table, the Councils go on to say that these facilities should be “secured by obligation / through DCO plans”. In the case of Wickham Market, it is believed that these plans are in hand, but in the case of Marlesford the pedestrian and cycle infrastructure envisaged by the Councils for our village have not been incorporated in the Draft DCO or the Draft DoO. It is not too late to hold EDF to account on this issue and greater weight could be given to the argument in favour of a new path if ESC supported its provision within the emerging Cycling and Walking Strategy.

A further safety concern for vulnerable road users, if SZC and the Scottish Power Renewables projects go ahead simultaneously, is the prospect of rat-running. There is a real fear that some drivers will avoid using the A12 because of the traffic on it and the difficulty of turning onto the A12 from minor roads. This anticipated added traffic on rural roads (often single track) will add to the safety issues faced by pedestrians and cyclists. This is particularly true for Marlesford cyclists who currently use the minor roads in order to get to Wickham Market.

## 6. Proposal

In meetings with EDF and SCC (which ESC also attend) to discuss A12 mitigation measures in Marlesford and Little Glemham, the issue of the pedestrian and cycleway has been regularly discussed, and Marlesford’s views are well known to all parties. EDF argues that it cannot fund the path as it is outside the DCO and DoO. SCC, whilst tacitly supporting the idea, see the issue of the required land being in private ownership (rather than the ownership of SCC Highways) as being problematic. Both EDF and SCC raise concerns about how the proposed path might be funded. This Parish Council believes that all these issues are capable of being overcome if all parties work together to achieve delivery of the proposed path.

Our proposal is for a combined pedestrian and cycleway starting at Bell Lane Marlesford and running (in the first instance) to the junction with Marlesford Road (both junctions are shown in Fig. 1 above). The newly created path would be on the north side of the A12 and would be part of the highway improvements already committed to by EDF.

A dropped kerb crossing should be provided at Marlesford Road and the path would continue towards the Southern Park and Ride on the northwest side of the existing hedge so that the hedge would provide a separation from the A12 northbound carriageway for cyclists and pedestrians.

The path would link with the proposed path from Wickham Market to the Southern Park and Ride and would therefore provide a continuous active travel route between the two villages.

We are advised by SCC Highways that the width of the path should be 3m.

We require the path to be properly surfaced to a standard that will allow wheelchair users and those pushing prams and buggies to use the new path safely.

MPC is about to open discussions with the landowners who would be required to put land into the project when it goes ahead, but it recognises that it will require technical support from SCC Highways once discussions are under way.

We do not see funding as an obstacle, although we don't underestimate the effort that will be required to assemble it. Our preferred option is that EDF should fund the project in its entirety in the way that is anticipated for other "off-site" infrastructure – we believe that it is not too late to put this obligation on EDF. However, if the EDF funding were to fall short of a full 100% coverage, we believe that other "pots" of funding will be available to facilitate the delivery of the scheme, some of which are set out in ESC's Draft Cycling and Walking Strategy 2021 consultation at Para 1.7.

## **7. Conclusion**

Whether SZC and other energy projects go ahead or not, MPC argues that the A12 between the village and Wickham Market is too dangerous for use by cyclists and the existing footpath immediately adjacent to the northbound carriageway is too narrow for safe use by pedestrians and contributes to a sense of fear and intimidation for vulnerable users.

The development of SZC and the cumulative impact of other energy projects would make a new pedestrian and cycle route between Marlesford and Wickham Market absolutely essential.

We regard the provision of a new path, funded by EDF and the other energy projects, as a valuable legacy contribution and a small price to pay for the upheaval that local residents will suffer over the next 10-12 years if the projects go ahead.

We urge ESC to include the Marlesford to Southern Park and Ride and Wickham Market to Southern Park and Ride combined pedestrian and cycleways in their schemes which will form part of their emerging Cycling and Walking Strategy.

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**Cllr Richard Cooper**

**10<sup>th</sup> January 2022**

## Appendix 1 – Photos of A12 Existing Footpath Between Marlesford and Entrance to Proposed Southern Park and Ride

Figure 2 The start of the existing path just west of Marlesford Road/A12 junction (looking towards Wickham Market).



Figure 3 The tarmacked path (heading west) ending approximately 300m from its start in Marlesford.



**Figure 4 Proximity of path to carriageway (looking east towards Marlesford)**



**Figure 5 Brambles and rose briars hanging into the carriageway.**



**Figure 6 Proximity of large vehicles to path (1)**



**Figure 7 Proximity of large vehicles to path (2)**



**Figure 7 Proximity of large vehicles to path (3)**



**Figure 8 Unmade track adjacent to A12 northbound sliproad.**



**Figure 9 Unmade track adjacent to bridleway at proposed entrance to Southern Park and Ride site.**



## **Appendix 2 – Marlesford Parish Council Responses to the online consultation document.**

The following comments are provided in the order in which the sections occur in the Draft Cycling and Walking Strategy 2021 consultation document. An online submission has been made but may be incomplete due to lack of space. The comments below are included for the completeness of this submission.

### **1. Comments under Introduction.**

Marlesford Parish Council is pleased to see that the proposals in the strategy are not exhaustive. MPC wants to take this opportunity to restate its case for a new pedestrian and cycleway from Marlesford Bell Lane to the proposed SZC Southern Park and Ride. This new path would link with the proposed path coming from Wickham Market to the Southern Park and Ride.

The requirement for the new path is in part driven by the potential development of SZC and the resulting increase by up to 1,000 movements per day by buses and HGVs on the A12 between Marlesford and Wickham Market and this could potentially be exacerbated if the Scottish Power Renewables proposals for Friston are approved. This would result in a significant cumulative impact in terms of traffic and will increase the fear and intimidation for vulnerable road users (as recognised by ESC and SCC).

MPC welcomes the recognition in the consultation that funding for pedestrian and cycleways could be linked to permitted Nationally Significant Infrastructure Projects (NSIPs).

We have a particular concern that rural areas can be left behind whilst urban area pedestrian and cycle facilities are improved. We want to make the case for allocating funding to rural areas and want to underline the imperative of providing safe and accessible active travel opportunities in non-urban areas.

### **2. Comments under Policy Context**

The weight of support for walking and cycling in national and local policy is clear. As a Parish Council, we endorse all policies designed to provide safe access to walking and cycling opportunities, particularly where these opportunities enhance connectivity between local communities. We welcome the ESC initiative to develop an East Suffolk Cycling and Walking Strategy on the basis that active travel will have a positive effect on health and wellbeing and contribute to a reduction in car journeys.

### **3. Comments under Recommendations**

We support the creation of corridors which provide longer connections between and within urban areas and the creation of imaginative recreational routes such as that proposed for the Yoxford/Aldeburgh/Benhall areas. Provision of active travel infrastructure is welcomed, but we ask ESC to ensure that rural areas do not “miss out” when funding is allocated. We particularly urge the Council to consider the safety requirements for pedestrians and cyclists in rural areas and recommend the Marlesford to Wickham Market improvements as part of an effort to address safety issues.

## **Marlesford Parish Council Comments on Community Recommendations**

In the initial consultation on a cycling and walking strategy at the end of 2020, Cllr Dr. Roger Waterfall made comments relating to Marlesford. These comments and the assessments of them have helpfully been presented in the current consultation document. The original representations are shown below, together with the Council's assessment **and in bold italics, we have added our comments on those assessments.**

### **Draft Cycling and Walking Strategy**

#### **ASSESSMENTS OF COMMENTS RECEIVED AS PART OF INITIAL CYCLING AND WALKING STRATEGY CONSULTATION OCTOBER TO DECEMBER 2020**

##### **Community Recommendation 305**

Marlesford A12 from Marlesford Road to B1116 (NW side of A12). To walk to Wickham Market from Marlesford requires several crossings of the A12. The path is often narrow and obstructed. A safe pedestrian and cycle way is required between Marlesford and Wickham Market.

I'm sure many of the Council will have driven through Marlesford on the A12. Has anyone tried to walk from Bell Lane to the Framlingham Road (B1116)?

A combined cycle/pedestrian track is required from Marlesford Road to the B1116 roundabout. This should be away from the highway, on the NW side of the hedge.

2 1 0 3 -1 0 5 The commenter proposes a footway with a segregated cycleway between Marlesford Road junction and the B1116 roundabout on the NW side of the A12 behind the hedgerow.

***Please note that the pedestrian and cycleway should be part of the SZC A12 mitigation measures in Marlesford village where improvements are proposed between Bell Lane and Marlesford Road.***

**Connectivity and Growth** – Wickham Market has a number of key services, which are not available in Marlesford, therefore the infrastructure will likely have significant connectivity benefit. However, as the proposed infrastructure does not cover the whole route into the centre of Wickham Market, a score of 2 is deemed acceptable.

***We argue that in the event of the SZC project going ahead, there is already a commitment to deliver a pedestrian and cycleway from Wickham Market to the Southern Park and Ride. This means that a new route from Marlesford would be able to connect at the Park and Ride and provide onward access to Wickham Market. The scheme should therefore attract a higher score.***

**Modal Shift** – According to PCT, if infrastructure is delivered to the highest standard, the proposal would result in a small modal shift hence a score of 1.

***We believe that this is subjective and anecdotal evidence would suggest a higher usage rate if a new, safe, pedestrian and cycleway was provided. We believe that this score should be revised upwards.***

**Optimisation** – The proposal is for new infrastructure and does not, therefore, optimise the existing.

***We draw your attention to Para 1.1 at the start of the East Suffolk Cycling and Walking Strategy which states that “the East Suffolk Cycling and Walking Strategy identifies potential cycling and walking infrastructure opportunities across the district. The Strategy focusses on the identification of new infrastructure opportunities rather than the maintenance of existing infrastructure. It provides context and information to support***

*detailed infrastructure proposals and inform decision making to support cycling, walking, and equestrian use.” This statement seems to be at odds with the optimisation evaluation comment which appears to require optimisation of existing facilities. At the moment, the existing path is immediately adjacent to the A12 carriageway, is narrow and not fit for purpose. The only solution is a new path.*

**Safety** – This section of the A12 is a busy ‘A’ type road with a national speed limit and appears to be often utilised by HGVs. Despite this section of the A12 having an existing small footway adjoining the NW side, removing cyclists and pedestrians away from the road will have considerable safety benefit. A score of 3 is deemed reasonable.

***We completely agree with this assessment, and it should be noted that the safety and fear and intimidation issues become greater if SZC and Scottish Power projects go ahead.***

**Biodiversity** – The commenter proposes implementing the cycleway and footway behind the existing hedgerow; therefore, the proposal will only result in the removal of managed grass hence a small negative score.

***We believe that the land on the NW side of the existing hedge is in arable cultivation and because of this there should be no, or negligible adverse impact.***

**Leisure** – No leisure impact.

***We would argue that the provision of any safe and serviceable path will, apart from its functional use of getting from Marlesford to Wickham Market, be used by local people for leisure. It is not correct to say that there is “No leisure impact”.***

#### **Community Recommendation 459**

Marlesford A12 north of Wickham Market. As already commented regarding walking, there is not a safe way of cycling from the Wickham Market roundabout to Marlesford and beyond. By providing a short section of Cycle/footpath this will allow cyclists direct access to Bell Lane which in turn leads towards villages around Parham Airfield, which is a designated industrial development area. This would allow somebody to cycle to work from Wickham to Parham without using the B1116 which is a busy route to/from Framlingham. Children from the villages could also safely cycle to school or access shops in Wickham.

2 1 0 3 -3 0 3 The commenter proposes a footway and cycleway between Bell Lane and the B1116 roundabout.

**Connectivity and Growth** – Wickham Market has a number of key services, which are not available in Marlesford, therefore the infrastructure will likely have significant connectivity benefit. However, as the proposed infrastructure does not connect into the centre of Wickham Market, a score of 2 is deemed reasonable.

***We argue that in the event of the SZC project going ahead, there is already a commitment to deliver a pedestrian and cycleway from Wickham Market to the Southern Park and Ride. This means that a new route from Marlesford would be able to connect at the Park and Ride and provide onward access to Wickham Market. The scheme should therefore attract a higher score.***

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***We completely agree with this assessment, and it should be noted that the safety and fear and intimidation issues become greater if SZC and Scottish Power projects go ahead.***

**Biodiversity** – The proposal could result in the loss of the established hedgerow adjoining the NW side of the A12 which warrants a significant negative score.

***Our proposal for a new pedestrian and cycleway would use land immediately to the NW of the existing established hedge (subject to obtaining private landowner agreement). It is therefore wrong to say that there would be loss of hedgerow and we ask that the score be revised accordingly. We believe that the land on the NW side of the existing hedge is in arable cultivation and because of this there should be no, or negligible adverse impact.***

**Leisure** – No leisure impact.

***We would argue that the provision of any safe and serviceable path will, apart from its functional use of getting from Marlesford to Wickham Market, be used by local people for leisure. It is not correct to say that there is “No leisure impact”.***

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