

SLAF
C/O Suffolk Highways

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Your Ref: EN010012
Our Ref: Registration ID 20026008

Date: 30 September 2020

Dear Sir

Representation to the Planning Inspectorate by the Suffolk Local Access Forum in response to the Development Consent Order by NNB Generation Company (SZC) for the proposed Sizewell C Nuclear Power Station. Planning Inspectorate Reference: EN010012

Local Access Forums are statutory bodies established by the Countryside and Rights of Way Act 2000 to comment and advise local authorities and other decision-making organisations on access issues for outdoor recreation and sustainable travel. They also respond to consultations and draft policy documents.

Since the start of consultation on a possible Sizewell C power station, the Suffolk Local Access Forum (SLAF) has had regular presentations from EDF at their meetings. We have welcomed these opportunities for dialogue and have subsequently made constructive comments to them at each phase of the consultation process. We are however concerned that although some of our comments have been taken into account, there are still outstanding issues we feel that still need to be addressed.

Summary

The main issues that we have been concerned about throughout the consultation process are:

1. The impact on the local and wider public rights of way network that the long construction phase will have, due to closures and diversions, and the consequential damage to the local tourism economy.
2. The impact of the suggested road schemes, and the increased traffic on the A12 on the rights of way network.
3. The need for a public access strategy during construction and a robust access legacy package to include all permissive routes and diversions to become definitive rights of way.

1. Impact on rights of way network

With regard to the local rights of way network SLAF has accepted the loss of Bridleway 19 during the construction period and welcomed the provision of an off-road route adjacent to the Eastbridge Road but would ask that this route is continued to Eastbridge itself. We would also ask for a safe pedestrian link from the B1122 through Aldhurst Farm to meet with Sandy Lane.

What is now the Suffolk Coast Path will shortly become part of the England Coast Path. Regrettably the route suggested by EDF is along soft sea defences which over time could disappear with coastal erosion. SLAF therefore requests that the definitive route of the path is moved onto the top of the new hard sea defences being constructed to protect the new power station.

2. Impact of proposed road schemes

Whilst SLAF has accepted the proposed new road schemes to help mitigate traffic impact on Farnham/Stratford St Andrew and Theberton, we welcome the dialogue that has occurred between EDF and the Highway Authority regarding the provision of safe crossing points for public rights of way on these new routes.

However, we have concerns that in the early years' construction traffic will access the site via Sizewell Gap which coupled with Sizewell A decommissioning traffic could lead to conflict with the use of local rights of way. Given the impact the additional traffic will have on the A12 from not only HGV movements but also construction workers and park and ride vehicles, we would ask that all points where public rights of way cross this road should be subject to a risk assessment audit.

3. Access strategy and legacy

This area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty between Aldeburgh and Southwold attracts large number of visitors who enjoy the local access network and bring significant economic benefits to the area. SLAF is concerned that that temporary and permanent closure of key north to south and east to west routes during the construction period would severely affect the local economy. We would expect EDF to provide local authorities, businesses, and communities with up to date information to enable the local population and visitors to make best use of the access available for walkers, equestrians, and cyclists. For example, when the Coast Path is closed whilst there are seaborne deliveries.

Post construction, SLAF are requesting that there should be a significant legacy benefit to the public access to the wider area around the power station including the permissive routes around Kenton Hills becoming definitive, with a new link to the coast path and better off-road cycle routes between Aldeburgh and Southwold.

Appendices

Attached are copies of SLAF's response to the Second, Third and Fourth EDF consultations

Your sincerely

Barry Hall
Chair Suffolk Local Access Forum

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SLAF Response

Sizewell - Stage 2 Consultation

SLAF notes that the construction phase will particularly impact on the Suffolk Coast Path shortly to become part of the National Coast Path, the Sandlings Walk which uses a permissive route through Gorse Hill, Bridleway 19 which will be closed and other public rights of way within the Leiston/Sizewell area. Consequently, we would seek reassurances that:

- ⤴ Any changes to the current network should be kept to a minimum.
- ⤴ Closure of the Suffolk Coast Path for development of sea defences, landing jetty and beach landing facility should be kept to a minimum so as not to impact on the use of the area by locals and visitors.
- ⤴ Any construction phase development should where possible have minimum physical and visual impact on access.
- ⤴ After construction, all closed routes including permissive ones should be re-instated to the satisfaction of the Highway Authority and where possible new routes which have been created should be retained and dedicated for public use.
- ⤴ Land used for campus and construction purposes should when established as heathland be dedicated as Open Access land under the CROW 2000 Act.
- ⤴ Regarding the Campus Site, Option 2 is favoured as this will enable retaining Eastbridge Road for access with the addition of the new bridleway/cycle route
- ⤴ With regard to the green rail route, where path closures are suggested with a long detour, it is felt that with the frequency and low speed of the freight trains these are not necessary are suggested with a long detour, it is felt that with the frequency and low speed of the freight trains these are not necessary provided crossings have adequate sight-lines.
- ⤴ Any highway improvements to the A12 and B1122 should have full regard for the safety of walkers, horseriders and cyclists.
- ⤴ The crossing at Lovers Lane should be a controlled one.

Publicity and Promotion

- ⤴ It is essential that any changes to public rights of way through diversions and closures whether long term or temporary are widely publicised through information boards around the affected routes, walk leaflets widely available at TIC's, hotels, b&b's, stations and libraries, and on relevant websites.
- ⤴ The construction site is likely to attract significant visitor interest and suitable arrangements such as viewing platforms should be put in place to cater for and manage this.

Legacy

- ⤴ Any new routes put in place as a consequence of the construction phase which would be to the benefit of the wider rights of way network should be dedicated for use by the public and shown on the Definitive Map.
- ⤴ Routes closed during the construction phase should be re-instated to the satisfaction of the Highway Authority.
- ⤴ Permissive routes on the EDF estate should where possible be dedicated as public rights of way.
- ⤴ New areas of habitat creation resulting from the reinstatement of land used for the campus and construction works should be when established should be open to the public and dedicated for Open Access under the CROW Act.

- ✦ The SLAF would expect EDF to engage in discussion with the Highway Authority how post-construction changes to the rights of way in the immediate area of Sizewell could better link in with proposals for the wider area included in the Rights of Way Improvement Plan.

SLAF further requests that EDF Energy makes information available to both the forum and Suffolk County Council officers on how the tourism and recreational legacy benefits from Sizewell will be scoped, developed and prioritised. The forum considers a timetable and process should be made available for working up legacy benefits.

SLAF Response Sizewell C -Stage 3 Consultation

Thank you for inviting the Suffolk Local Access Forum (SLAF) to comment on the latest round of consultations on EDF's plans for Sizewell C. As a statutory consultee and adviser to Suffolk County Council on issues affecting access to the countryside defined by the CROW Act 2000 we are concerned that little notice has been taken of our response to the Stage 2 Consultation and would stress that the points raised at that time are still valid.

See the Appendix restating our response to the Stage 2 Consultation.

The main issues that we have concern relating to the latest consultation are:

1. The impact on the local and wider rights of way network that the long construction phase will have.
1. The impact of the suggested road schemes and increased traffic on the A12 on the rights of way network.
2. The proposed closure and diversions of public rights of way crossings by Network Rail on the East Suffolk Line.
3. The impact on tourism.
4. The need to agree a legacy strategy with Suffolk County Council for access following the end of the construction phase.

Impact on Rights of Way

Assumptions seem to have been made regarding usage of the rights of way network by both EDF and Network Rail that are at odds with the experience of local communities and other bodies and we ask that further monitoring is carried out to provide a more accurate assessment.

We are concerned that the decision to dispense with a jetty and only provide a beach landing facility has implications to the use of what will be the England Coast Path and would request that this is reconsidered. The use of a jetty would have given walkers and cyclists access to the coast path most of the time, but the use solely of a beach landing facility could see the route closed several times each month during the main tourist season with a very long alternative route put in place. SLAF would expect that during closures a minibus should be made available to link Sizewell Beach with Eastbridge, Minsmere and Dunwich Heath. Closure of this key route could also encourage visitors to intrude into more environmentally sensitive areas.

During the construction of the proposed new sea defences we would expect the Coast Path to remain open. In the longer term we have concerns that the path being squeezed between the new dunes and the beach that if over time the beach erodes then the path could be lost when roll-back finally reaches the power station boundary.

Workers during the construction phase not on the campus but living close by should be encouraged to use cycling for their journey to the site. To encourage this proper dedicated safe cycle routes should be considered as this would also benefit the increasing number of leisure cyclist who use the area.

Any rights of way closures should be agreed with the Highways Authority well in advance of the submission of the DCO with dates, lengths of closure and alternative routes.

Impact of Road Schemes

SLAF notes that new bypasses are proposed for Farnham/Stratford St Andrew and Theberton. We are concerned that these will bisect public rights of way and would expect that as these schemes are firmed up in consultation with the Highway Authority, safety measures that reflect the status and use of the crossing points should be incorporated into their design. We are also aware that the increased traffic using the A12 during the construction phase on top of the existing traffic to Sizewell A for decommissioning and B for operation and maintenance means that Road Safety Audits should be carried out at sites on this major road where public rights of way cross the road and the necessary improvements made.

Rail Crossing Closures

SLAF is not convinced that the increased use of rail transport to bring construction materials into the site via the Green Rail route should be used by Network Rail as an excuse to close and divert twelve crossings on the East Suffolk line. We feel that a longer consultation period should be given, and more information

provided so that the proposed diversions can be properly assessed on the ground by the Highway Authority and where public roads are used a Road Safety Audit should be produced. SLAF would prefer no closures but the use of audible warnings and miniature stoplights instead.

Impact on Tourism

Being in an Area of Outstanding Natural Beauty, the countryside from Aldeburgh to Southwold attracts large numbers of visitors both local and from further afield who use the local access network and bring significant economic benefits to the area. SLAF is concerned that the temporary and permanent closure of many of the key routes during the long construction period would impact badly on the local economy and that a strategy should be agreed that would show which routes were closed or diverted and when. We would look to EDF to provide a Community Liaison Officer who would provide a contact point with local authorities, businesses and communities to ensure adequate signage and information was widely available throughout the area and host a dedicated web site.

Legacy

SLAF would expect that following the construction period there should be positive green access gains for the immediate and wider area including the reinstatement of all closed public rights of way to a standard agreed by the Highway Authority with a commuted sum for future maintenance, the retention and dedication of all temporary diversions where they make a useful addition to the network. In addition, the provision of a north – south bridleway/cycle route between Aldeburgh and Southwold and a west – east Sandlings Walk link to the coast would be welcomed.

SLAF Response Sizewell C Stage 4 Pre-Application Consultation

Thank you for giving the Suffolk Local Access Forum (SLAF) the opportunity to comment on your latest plans for the construction of Sizewell C and for briefing its members at our July meeting. Whilst we feel that the responses that we made to the previous consultations are still valid and that these should be taken into account by EDF prior to the submission of the Development Consent Order we feel that there are further points that we would wish to make in relation to the latest consultation.

Transport of Construction Materials

In our response to the previous consultation we expressed concern about the closure of the large number of footpath crossings on the East Suffolk rail line in order to provide a rail-led strategy. From SLAF's perspective there was not enough detail given by Network Rail and from our involvement with previous crossing closures proposed by them in Suffolk we were sceptical about their ability to deliver in the tight timescale for Sizewell C. Although a rail-led strategy would have been preferable, given our previous concerns we therefore now support the Integrated Strategy with the upgrading of the Sizewell branch with the improvements to the footpath crossings and the use of the green route. As part of this new route we would support a gated level crossing on Bucklewood Road rather than a road closure with a footbridge.

Road Improvements

SLAF notes that with an Integrated Freight Strategy the proposed Theberton by-pass would be part of a new Sizewell Link Road between the A12 south of Yoxford and the B1122 and the red line has been extended to provide more flexibility and allow better non-motorised traffic safety. We welcome the ongoing discussions with Suffolk County Council's rights of way team regarding that where public rights of way cross the proposed road, safe crossing points are provided for pedestrian, equestrian and cyclists and that the use of Pretty Road footbridge is part of the proposals.

For this route and the proposed two villages by-pass we would expect that where there are public rights of way crossing these new routes the following principles should be applied:

1. Continuing liaison with SCC rights of way and highways teams
2. Road safety audits are carried out at all proposed crossing points
3. Adequate sight lines with dropped kerbs at crossing points
4. Level entry at all crossing points, not direct off steps. Where this is likely, a diversion should be made to a safe crossing point
5. Any stopped-up road should be retained with bridleway status
6. All changes need to be in place before construction begins
7. All surfacing, signage etc. should be agreed with the highway authority and routes should not be made available until signed off.

With regard to the Farnham bypass we welcome the proposed new bridleway bridge by Farnham Hall and the upgrading of the St Mary's church to Barn Farm as a bridleway.

Public Rights of Way and Bridleway19

As you are well aware, the role of SLAF is to advise the local highway authority and other organisations on access issues and that has been our focus during each stage of consultation. We welcome the amendments proposed to the proposed Bridleway19 diversion which will be used during the construction phase, particularly the reduction in road crossing points, the split surface shared route for equestrians, pedestrians and cyclists, also the new link to the proposed worker's caravan site. However, we would like to see the off-road bridleway route to be extended further north towards Eastbridge itself before it meets Eastbridge Road. The safe crossing points to be constructed as part of the Bridleway19 should be retained post construction.

However, we still have concerns regarding some other rights of way issues.

We are especially concerned about the soon to be England Coast Path. As SLAF understands it, during the construction of the new sea defences in front of Sizewell C the path may be diverted down the beach towards the sea. This raises safety issues, for instance if there is a high spring tide. We would also expect any such diversion to be accessible to all users with matting or something similar laid over the shingle to provide a level surface. Once the sea defences are in place, we would like to see the definitive legal route of the public right of way moved to the top of the defences which should be of sufficient width to accommodate this. This would future-proof the route against any long-term erosion issues.

With the possibility of closures of the Coast Path to enable beach landing of construction materials, these should be kept as short as possible and the frequency and duration notified well in advance to all interested parties. SLAF is still concerned that proposed long diversion route could cause problems to people who are walking to a tight schedule and the extra time taken for that this route could cause them accommodation problems at the end of the day. We therefore would see the provision of a shuttle minibus between Sizewell and Dunwich as an alternative of great benefit.

At Kenton Hills, whilst we welcome the new connection route to the permissive path network we would like to see post construction the link between Bridleway19 and the Coast Path become a definitive route as part of the legacy.

With regard to Valley Road which is very narrow. If this was downgraded to a bridleway it could provide a useful cycle route from the worker's caravan site to the construction site.

Habitat Compensation Land

SLAF notes that additional areas of land have been suggested for habitat creation as part of the mitigation measures. We ask what consideration has been given on the impact to nearby rights of way? For example, the construction of the lagoon off Sandy Lane could impact on the use of this narrow track by walkers if used to remove the spoil.

General points

SLAF would expect that a programme of regular meetings should be held during the construction phase with representatives of the local community and stakeholders so that any issues arising can be speedily resolved. We would also like to have regular updates at our meetings. As we already stated, SLAF would like to see a Community Liaison Officer funded by EDF in post before construction begins, as a link between them and the local community and businesses to address day to day problems that might arise.

Wording of the Section 106 agreement should be flexible as to how it can be used to deliver improvements. We would expect that it would be agreed between the relevant bodies prior to the submission of the DCO. SLAF is concerned about the amount of SCC rights of way staff time that has been expended on the project so far and will continue as it progresses and therefore feel that the agreement should allow for the funding of an extra staff member for at least two years as other work has suffered.

Legacy

SLAF has been highlighting in previous consultations the disruption that the construction phase of Sizewell C will cause to the public right of way network which will be wider than in just the immediate area. We would therefore expect EDF to provide a post-construction mitigation package which will enable a more accessible and joined up rights of way network that will bring positive benefits to the whole of the Area of Outstanding Natural Beauty including an off-road cycle route between Aldeburgh and Dunwich.