

DEVELOPMENT CONSENT ORDER EN010012 : THE SIZEWELL C PROJECT

SUBMITTED WRITTEN RESPONSE TO ADDITIONAL SUBMISSIONS AS 013, AS 261 and AS 266.

Sylvia Ballard
BHS and Cycling UK Member



31 May 20121

To the Examination Authority

Please accept my apologies as I do not have an IP ID Number, but hope that this submission will be accepted in response to the latest Additional Submissions concerning the Sizewell C Project.

Attached with my submission (Attachment 1) is a copy of a letter dated 16 December sent in response to the SZC Stage 4 Consultation Community Newsletter where I first became aware of the affect of the Sizewell C Planning Application on Bridleway 19 Leiston cum Sizewell. I was not aware at that time of the importance of also copying submissions to the Planning Inspectorate.

My particular concerns are for the northern section of **Bridleway 19 Leiston cum Sizewell (BR19)** that will be affected by the proposed development of Sizewell C.

I accept that for reasons of public safety an alternative route will need to be provided for users of this popular public right of way to enable the construction to take place, but how can this be achieved when the alternative route is part of the proposed construction of Sizewell C?

BR19 is a well-used by walkers, cyclists and horse riders as it provides a mostly off road connection between the extensive network of bridleways

and permissive riding routes to the north and byways and bridleways to the south.

Please see attached with my submission a copy of the Definitive Map of Public Rights of Way for the Leiston cum Sizewell area (Attachment 2).

I have used **BR19** for over thirty years as a horse rider, as part of a circular route which includes riding along the beach at low tide between the high and low water mark from Sizewell to Bridleway 14 Dunwich, and then passes through some of the best landscapes of the Suffolk Coast and Heath AONB.

I usually park my horsebox in the Kenton Hills car park, then ride south along the short section of **BR19** that is now located on the road now called Lovers Lane that was once just a sandy track like the remaining parts of **BR19** called Sandy Lane.

This section of the **BR19** was subsumed in the road when the road was developed as the access to Sizewell B. Horse riding on this section of road is no problem as the road is wide with clear sight lines to the next part of the off road bridleway. However the provision of an off road bridleway for this section is long overdue, and is to be welcomed whatever the outcome of the application to develop Sizewell C.

As shown on [AS 013](#) **2.4 Access and Rights of Way Plans: Main Development Site And Rail Rights Of Way Plans – Sheets 1 and 2 of 27** (pages 8 - 9) the northern part of **BR19** is located passing through the main construction site area, and is identified on the plan as **E-363/019/0** running northwards from near the Kenton Hills car park towards the Eastbridge Road in the north, and is described in the key as:

■|■|■|■| ■ **EXISTING FOOTPATH AND PRESUMED PRIVATE MEANS OF ACCESS TO BE TEMPORARILY STOPPED UP AND REINSTATED**

I am extremely concerned that this valuable route will be stopped up rather than temporarily diverted to a safe alternative horse riding route for the duration of the 10+ year period of the construction phase of the proposed development of Sizewell C.

As can be seen below on **AS 013: Rights Of Way Plans – Sheets 1 and 2 of 27** and throughout all the SZC consultation documentation all public rights of way are described as ‘footpath’ whatever their legal status.

NOTES:

ALL FOOTPATHS, CYCLEPATHS, BRIDLEWAYS, BYWAYS AND RESTRICTED BYWAYS ARE REFERRED TO AS FOOTPATHS.

Not only is this confusing, but it also means that any proposed alternative route described as ‘footpath’ may only be suitable for pedestrians where the provision of the alternative route needs to be safe and suitable for horse riders.

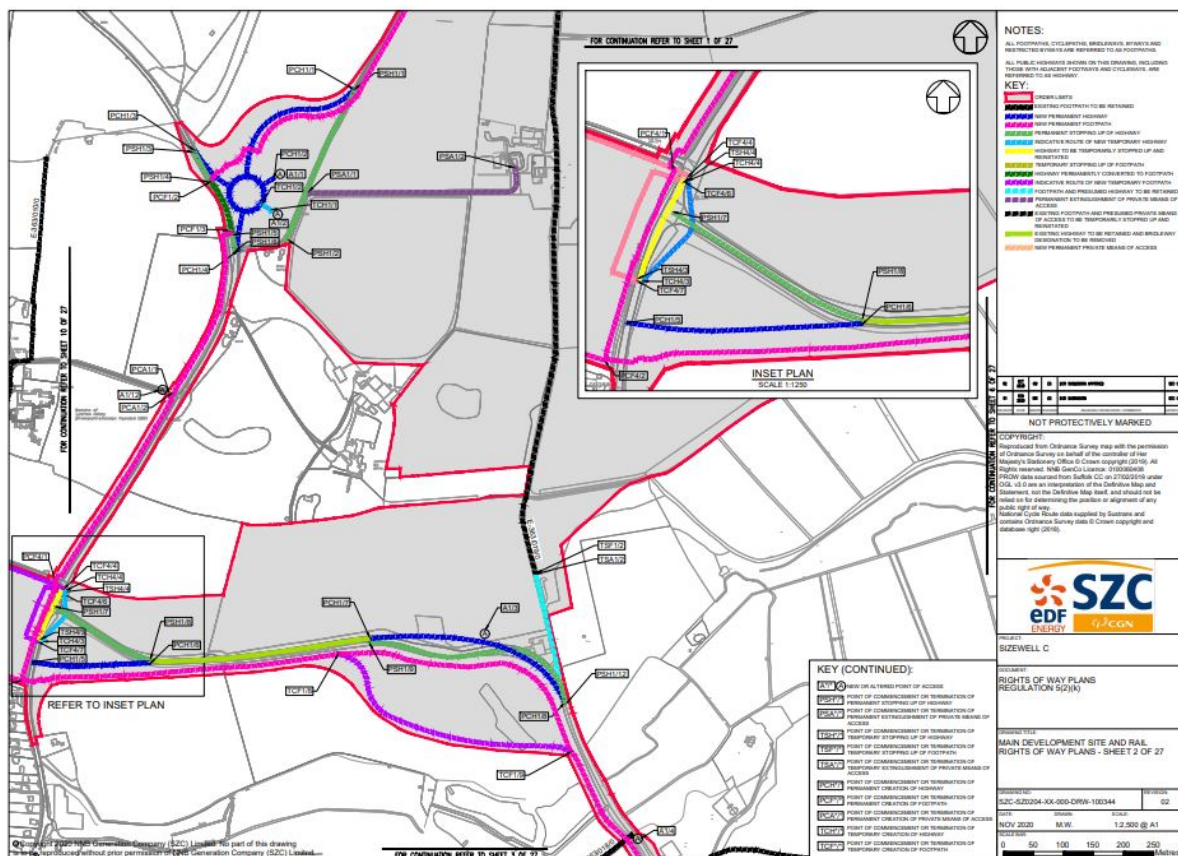


Figure 1:- AS 013: Rights Of Way Plans - Sheet 2 of 27

(AS 266) 8.5 Transport Assessment Addendum Section 12 paragraph 12.2.5 (page 150) assumes that the southern end of **BR19** will remain open to the public during the construction phase, but does not mention the temporary stopping up of the northern section of **BR19**. The only reference to the northern section of **BR19** as being ‘temporarily stopped up’ is in the Key on **AS 013 2.2 Access and Rights of Way Plans: Main Development Site And Rail Rights Of Way Plans – Sheets 1 and 2 of 27**

The provision of a brideway link across Lovers Lane described in **AS266 Transport Assessment Addendum Section 12 paragraphs 12.2.5-9** will benefit walkers accessing the Kenton Hills car park and permissive walking routes during the construction stage of the main Sizewell C site, but will not benefit horse riders attempting to use **BR19**.

(AS 261) 8.1 Main Development Site Design and Access Statement Addendum 2.5 Amenity and Recreation Strategy (page16) makes it clear that

2.5.4 The new permanent route and crossing point would be made available for pedestrians in the construction phase once the entrance to the main development site from the B1122 is in place and the number of HGVs using the early years access is reduced. The link would be designated as a brideway once construction is complete.

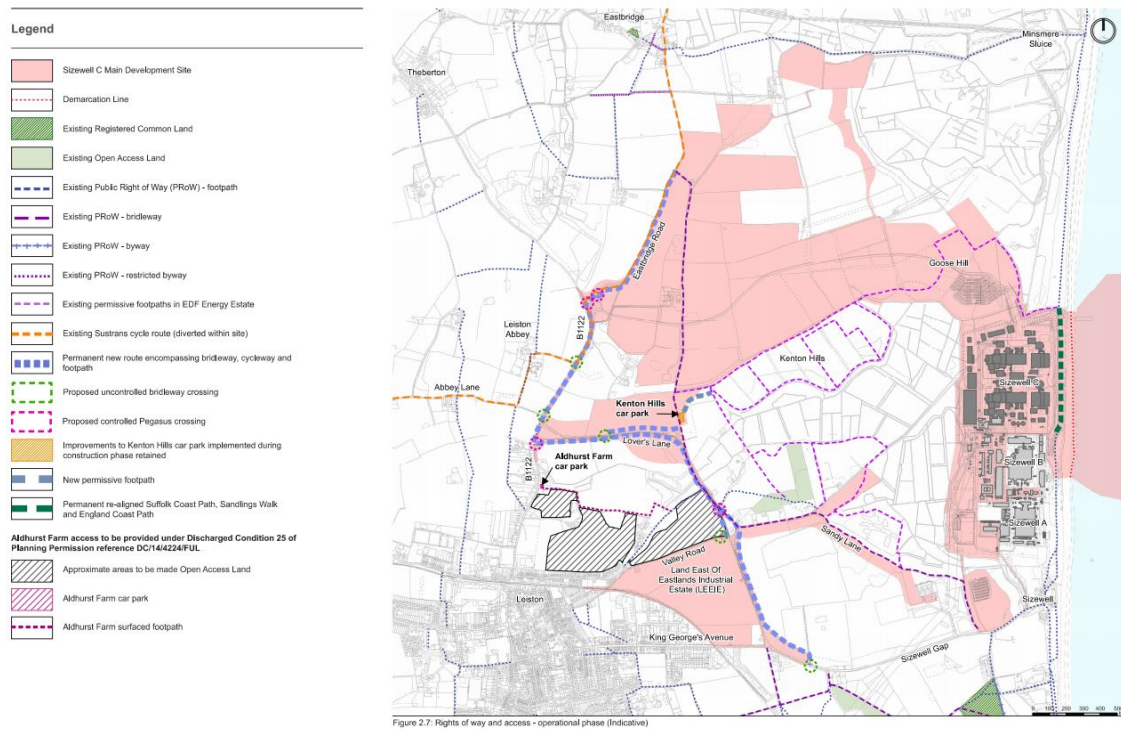


Figure 2:-AS261 Amenity and Recreation Strategy Figure 2.7 (page17)

The proposed 'permanent new route encompassing bridleway, cycleway and footpath' shown above on **Figure 2.7 of AS261 Main Development Site Design and Access Statement Addendum 2.5 Amenity and Recreation Strategy (page17)** will not be available until it is built as part of the proposed alterations to the B1122 road, and then during the 10 year+ construction period will only be available for pedestrians. If this is the alternative route for **BR19** where is the provision for horse riders?

The construction of the main development site, the alterations to the B1122 and the provision of the permanent new bridleway, cycleway and footpath are all encompassed in the whole development of the Sizewell C site.

As the northern section of **Bridleway 19 Leiston cum Sizewell** is located in the main construction area, the temporary stopping up of this right of way would need to comply with the requirements of [\(DCO\) Schedule 17 of the Draft Development Consent Order EN010012-002875 SZC](#) before any of the development construction could take place.

Under **Schedule 17 of the Development Consent Order EN010012-002875 SZC** it is clearly stated that that no public right of way ('street') may be wholly or partly stopped up or extinguished unless a new temporary right of way ('street') to be substituted for it has been completed and is open for use to the reasonable satisfaction of the street authority.

The proposed diverted route for **BR19**, which would also include the temporary diversions of the Suffolk Coast Path and the Sandlings Walk, was identified at an early stage in [\(APP 270\) Environmental Statement Volume 2 Chapter 15 Amenity and Recreation](#) and shown in **Appendix 15I Figure 15I.2.** (page 118)

1.2.16. The new off-road bridleway would be constructed prior to the closure of the Coast Path and temporary diversion of bridleway 19 and closure of bridleway E-363/013/0.

As the consultation and additional submissions have progressed all the Right of Way Plans use the term 'footpath' to describe all public rights of way, whether they are footpaths, bridleways, byways or restricted byways. So when temporarily diverting **Bridleway 19 Leiston cum Sizewell**, to meet the criteria of **Schedule 17 of the Development Consent Order EN010012-002875 SZC**, the substitute way provided

may be described in the plans as a 'footpath' but must be suitable and safe for horse riders.

As has been shown from the various submissions made by NBB Generation Company (SZC) Ltd no safe alternative route would be provided during the entirety of the construction period that was open, safe and usable by the horse riders who currently enjoy free access along **BR19**.

The safe passage of all the users of **BR19** must be protected, and it is unacceptable for horse riders to lose this valuable through route for the duration of the construction of the proposed Sizewell C.

CONCLUSION: For the terms of the **Development Consent Order EN010012-002875 SZC** to be met, a suitable and safe alternative route for the northern section of **Bridleway 19 Leiston cum Sizewell** must be provided, be certificated by Suffolk County Council, and be open and available for use by horse riders and all other members of the public before any temporary stopping up can be authorised and before any construction work affecting **BR19** can commence.

However, the only possible alternative route for **BR19** will not be available until the end of the initial construction stage. As **BR19** is located within the construction site, the route cannot safely remain open to the public during the construction of the alternative route.

This conundrum has not been adequately addressed by the applicant of **DCO EN010012-002875 SZC**.

Thank you for considering the content of my submission.

Ms S M Ballard



16 December 2020

SZC Consultation
info@sizewellc.co.uk

CONSULTATION ON CHANGES TO DCO PLANNING APPLICATION SIZEWELL C PROJECT

Potential change: A new bridleway link between Aldhurst Farm and Kenton Hills

This proposed bridleway link is in addition to the proposed changes affecting Bridleway 19 Leiston cum Sizewell.

The access requirements for horse riders are very different from those of walkers. The proposed bridleway link between Aldhurst Farm and Kenton Hills may benefit pedestrians, who can use public rights of way of any status as well as permissive footpaths such as those at Kenton Hills, but will not benefit horse riders at all, as the route of Bridleway 19 beyond the Kenton Hills car park is proposed to be diverted.

The current route of Bridleway 19 follows a wide historic alignment bounded by many mature trees and important hedgerows from the Sizewell Gap road, via Sandy Lane, with a short section subsumed in Lover's Lane, passing the Kenton Hills car park and continuing to the Eastbridge road.

Bridleway 19 forms part of a network of well used bridleway routes between Aldeburgh and Southwold. Local riders have customarily had access to the beach at Sizewell, and at low tide can make a circular route along the beach from Sizewell to the bridleway at Dunwich Heath and returning via bridleways in Dunwich and Westleton, past the Eel's Foot pub where there is a tethering rail for horses, and Bridleway 19 Leiston cum Sizewell back to their starting point. This route passes through some of the best landscapes in the Suffolk Coast and Heaths AONB and is an absolute joy to ride.

The proposal to permanently divert the whole of Bridleway 19 to a route adjacent to or on busy roads with 3 uncontrolled bridleway crossings and 4 controlled Pegasus crossings will not 'improve recreational connectivity and enhance the north-south recreational routes within the Suffolk Coast and Heaths AONB'* for horse riders.

Most concerning is the double Pegasus crossing at the roundabout where the Sizewell Link Road connects to the B1122. This roundabout will carry all the usual heavy traffic of the B1122 as well as the heavy plant and lorries accessing the proposed development site of Sizewell C. Even with the provision of a double

Pegasus crossing this location is unsuitable for recreational use by horse riders, especially in the context of the loss of the original rural route of Bridleway 19.

Bridleway 19 runs through the heart of the proposed development area for Sizewell C and has been identified as having significant trees and important hedgerows. Some of these trees and hedges have been shown in the landscape retention and site clearance plans, and are destined for removal. The remaining hedges and trees, as well as the surface of the historic track, will be at high risk of damage from the movement of heavy vehicles and plant and the movement, storage and collection of construction materials for the proposed development.

Bridleway 19, with its benefits to the local community, is not included in the land restoration of Pledge 7.

Having been identified as being affected by the proposed development, as part of the planning process Bridleway 19 may need to be temporarily diverted should planning consent be granted. As Bridleway 19 forms such an important part of visitor access to the AONB, particularly for horse riders, there is no justification for permanent closure and diversion of this quiet, rural route.

So in response to *Consultation response: Question 10: Other main site changes, e) **Bridleway** my answer is:

No, this additional bridleway link and road crossing will not improve or enhance the recreational use by horse riders of the proposed diverted route of Bridleway 19 Leiston cum Sizewell, and under no circumstance should the diversion of Bridleway 19 be made permanent. Should planning consent for the proposed development be granted, and Bridleway 19 be temporarily diverted, the historic route should be safeguarded from damage as part of a cherished landscape.

Yours sincerely

Sylvia Ballard



Leiston-cum-Sizevell 363

WORKING COPY OF
RECORDED PUBLIC RIGHTS OF WAY
DERIVED FROM THE DEFINITIVE MAP
FOR THE FORMER RURAL DISTRICT OF
BLYTH

Relevant date: 1 July 2019
Date of issue: 1 October 2019

The information on this map should only be
relied on for this named parish only. Routes
shown in other parishes may have been
subject to legal orders not reflected on this map.

Email: definitivemaps@suffolkhighways.org
Telephone: 01473 264774

© Crown copyright and database rights 2019
OS 100023395. You are permitted to use this
data solely to enable you to respond to, or
interact with, the organisation that provided
you with the data. You are not permitted to
copy, sub-licence, distribute or sell any of this
data to third parties in any form.

Scale 1:10000

- KEY to Rights of Way symbols**
- Footpath
 - Bridleway
 - Restricted Byway
 - Byway Open to All Traffic
 - Definitive Map parish boundary
 - Former district boundary



Growth, Highways and Transport
Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX.