



B1122 Action Group on Sizewell

Sizewell C Development Consent Order - Written Submission of Oral Case

Transport Assessment and Addendum (8.5)

The B1122 Action Group is concerned that, while predicted vehicular traffic is given in detail, the rail element is qualified by statements such as “we have identified the potential to run four trains a day” and “this work is ongoing”. Similarly, the target of “up to approximately 100 beach landings per annual campaign” is worryingly vague.

We share the concern of Suffolk County Council (SCC) that failure to hit these targets will rebound onto road transport. The applicant’s record at Hinkley Point where, in December 2017 after DCO approval, they applied to increase HGV numbers further by up to 250 a day, shows that this is a real threat [<https://www.sedgemoor.gov.uk/article/3587/Transport>].

We submit that the Examining Authority should insist that traffic figures are final and not to be exceeded. If necessary, construction should be slowed to the pace of the available transport.

‘Early Years’

While other elements of the project have clear sections and chapters, the ‘Early Years’ phase, which for residents on or near the B1122 will be the worst period, does not. As a result, data and analysis is not as deep, and where it does exist, is hard to find. This is a clear failure in the application.

The B1122 is a B road, with all it implies. Residents on or near the road and in Theberton and Middleton are older with, we estimate, an average age of around 70. Norwood house retirement home at Middleton Moor specialises in dementia patients. Some homes are only a few feet away from the road edge.

At peak, the road would carry up to 600 HGV movements a day plus 200 for Link Road construction, close to the 840 HGVs and buses on the current A12 [*Stage 4 consultation, Table 4.4*], and the eventual Link Road; a huge number for an unimproved B road. With no Park and Rides operational, many hundreds of workers’ cars will also use it. Yet the applicant does not even state the traffic volumes at peak (07:00-08:00) but instead shows 08:00 – 09:00 [*Transport Assessment 8.7.13*]. We submit that the Examining Authority should demand and assess peak traffic volume data.

The B1122/ A12 Yoxford T junction is a real concern. We do not believe that the applicant’s modelling has properly accounted for the proximity of the A12/ A1120 and A12/ B1122 junctions and their interaction, the peaks that occur during the tourist season, festivals and bank holidays, nor

the hourly release of traffic from Darsham level crossing. At these times, tailbacks from the former can already prevent egress from the latter; this can only become worse with higher traffic volumes.

When one adds the inevitable disruption (omitted by the applicant) of the roundabout construction on the site of the current junction, we conclude that substantial congestion and occasional gridlock will occur.

The A12 through Yoxford (*location YX3*) is already (*2018 baseline*) on the limits of acceptable particulate levels, with annual concentrations of 15.5 and 10.6 µg/m³ of PM₁₀ and PM_{2.5} respectively [*6.8 Volume 7 Chapter 5, Table 5.10*], with a primary school 200 metres away. The World Health Organisation's Air Quality Guidelines are 20 and 10 µg/m³ of PM₁₀ and PM_{2.5}, respectively [http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/].

The applicant claims [*Tables 5.11 and 5.12*] that particulate levels will fall during the Early Years, and further still once the Link Road is open. We find that inconceivable, given the substantial increase in vehicles of all kinds.

We recommend that the traffic and pollution modelling and the assumptions behind it are re-examined thoroughly by an independent authority.

Safety, noise and vibration

The B1122 has many dangerous junctions and entrances. Some residents use mirrors on the opposite side of the road, if they are not misted with dew or rain. Alternatively they listen for oncoming traffic. The traffic levels in these Early Years will make these unfeasible.

Some parts of road are used by pedestrians, especially in Middleton Moor where there are no adjoining footpaths or sidewalks, and from Beveriche cottages over the level crossing to the A12 bus stop. There are also frequent horse riders and cyclists.

We have found no proposals for speed cameras or reduced speed limits. The applicant should consider an average speed camera system from the A12 to the site entrance.

We do not believe the applicant has taken noise and vibration at this stage seriously [*6.7 Vol 6 SLR Chapter 4*]. In referencing acceptable noise limits they use national SOAEL (Significant Observed Adverse Effect Level) figures, which take no account of baseline noise levels that individuals or environments are accustomed to. They are unable to combine the simultaneous noise levels from SLR construction and B1122 road traffic [*Para 4.6.10*], but state that this is acceptable because construction will drown out road noise: "when construction noise is at a significant level, road traffic noise would not contribute to the overall perceived level." [*4.6.11*]. This is not acceptable.

Vibration damage to properties on the B1122 does not appear to have been considered, despite close proximity to the road of several, or the listed status of some – in particular the 12th century Theberton Church.

We recommend a monitoring and compensation scheme including pre and post Early Years building surveys.

We believe it is unacceptable to use the unimproved B1122 to carry this level of traffic and recommend that the Examining Authority insists on the Link Road, Park and Rides and Two Villages bypass being completed and operational before any substantial traffic commences.

Sizewell Link Road [6.7]

We maintain that the process by which the route for the SLR was chosen was inadequate and unsupported by evidence, and the subsequent 'Peer Review' used subjective and non-standard numerical scoring without foundation in normal practice. We support the many negative conclusions drawn by SCC and ESC in their joint response of July 2019, which stated that further work was needed to provide an evidence-based approach if the chosen route be considered sufficiently robust.

The biggest problem is that the route runs the wrong way, north west, when the demand is from the south. This will encourage rat running along narrow country lanes to cut the corner. Sizewell workers already do this, and can be observed most days at the B1122/ Lovers Lane junction taking the single track farm road opposite towards the A12.

Legacy

The absence of any legacy value of this route to the community is a huge issue. SCC has been reluctant to adopt it after construction, and there have been serious discussions about removing it afterwards.

The SLR will impact many homes with noise, pollution, light and vibration. In some cases, it is as close as 100 metres to homes on the B1122. It will scar the landscape considerably: 80% of its length are either embankments up to 10 feet high or cuttings as deep into the landscape. It will need 45,000 cubic metres of filler material brought in. Those embankments and cuttings will create a barrier, slicing through the parishes of Theberton, Middleton, Kelsale and Yoxford, with outlying homes and farms split from their village cores. It will also prevent natural wildlife movement, especially of deer.

The route will create a ribbon of unusably small fields between itself and the B1122, and disrupt popular public rights of way. It will complicate local private traffic and farm traffic, forcing circuitous routes and adding to emissions.

Extended overnight hours for HGVs between 11pm and 7am are proposed. Given the proximity of many homes to the road this is entirely unacceptable.

We support demands from Middleton, Theberton and Yoxford parish councils for the removal of the B1125/ B1122/ SLR junction which will only serve to divert SLR traffic along the unsuitable B1125.

The most popular alternative route, which would run west of Leiston to the A12 south of Saxmundham, provides better outcomes. These are detailed in our report by Richard Lewis MRTPI of ActivePlanning. The route, originally recommended as 'D2' through a consultation process for Sizewell B, approximates to W North in the Stage 3 consultation. We understand that Suffolk County Council requested that this option be consulted upon at Stage 3, but this was rejected by the applicant.

We recommend that the Link Road route be reappraised by an independent authority.

Mitigation

We recommend that the applicant be required to provide in detail:

- noise insulation or double glazing on both the B1122 and Link Road, as was the case with Sizewell B,
- a robust system for handling noise complaints and a procedure for investigating and remedying them rapidly,
- a scheme for monitoring and compensating for vibration damage,
- a wider footprint for the Property Price Support Scheme,

Conclusion

We believe that the sheer scale of the project and its transport demands are out of all proportion to the ability of the area to reasonably cope with its impacts. Given all the other issues, we therefore recommend that the Examining Authority reject the application.