



B1122 Action Group on Sizewell

Sizewell C Development Consent Order. Written Representation - Report

1. Summary of Community Impacts

- *Transport*

The amount of road based transport would have severe adverse impacts on local communities and result in long term damage to the East Suffolk visitor economy. The proposed delayed completion of the SLR until year 3 of the development will mean that the A12 through Yoxford and the B1122 will carry substantially increased traffic during the first three years of site development, including additional 200 HGV movements per day associated with the SLR's construction over and above the 600 HGVs associated with the early years construction at the Sizewell facility. Furthermore, the majority of the other proposed transport mitigations will not be implemented in the early years' timeframe, leaving consequential and unfair adverse impacts on communities and road safety. The situation will lead to increased and unmitigated community severance, noise and air pollution. It will increase road danger on a road that is clearly acknowledged by the proposed design of the SLR as unfit for the purpose of carrying heavy traffic. Construction of the SLR at the same time will create, in aggregate, a 'surround sound' of unacceptable noise and disturbance from all sides, affecting residents' enjoyment of living in their communities, their health, safety and mental wellbeing. The magnitude of these cumulative impacts has not been inadequately measured: the ES fails to consider the most sensitive times of day. ***Is the applicant able to show that the early years' transport impacts will be acceptable at all times of the day, and that the combined impacts of noise and disturbance from additional traffic and SLR construction (the multi-faceted 'surround sound' effect) will be within acceptable limits?***

The proposed route of the SLR itself is unacceptable. Alternative routes exist, in particular potential routes starting from south of Saxmundham. Alternatives have been dismissed as options by the applicant with no adequate reasons, insufficient evidence and contrary to the views of Suffolk County Council as Highways Authority. ***Is the applicant able to provide evidence that there has been a thorough examination of all SLR options and that the applicant's favoured option (route Z) is the best in terms of its community impact and legacy value?***

- *Cumulative Impact*

The cumulative impact of the energy infrastructure projects currently planned for this part of the Suffolk coast is highly significant as it would adversely impact the lives of Suffolk residents, visitors, the tourism and hospitality industry and the built and natural heritage for many years to come. Cumulative impacts include Sizewell C, the operation of Sizewell B, the decommissioning of Sizewell A, the Scottish Power Renewables proposals for onshore wind farm infrastructure at Friston and other planned projects (Greater Gabbard, and Galloper wind farm expansions, Nautilus, Eurolink and two Sizewell to Kent interconnectors). The disbenefits to Suffolk life from Sizewell C and these other projects will be overwhelming and result in significant industrialisation of a rural area and landscape and biodiversity assets of national significance. ***Is the applicant able to provide evidence that there is no need for Government energy infrastructure policy to urgently address the cumulative impact of proposed energy infrastructure projects in East Suffolk?***

Transport

By Richard Lewis, an independent town and transport planner (transport evidence)

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Summary of Community Implications

2 Transport evidence

The following evidence has been compiled for Stop Sizewell C , Theberton & Eastbridge Parish Council and the B1122 Action Group by Richard Lewis MRTPI, a town and transport planner with over 20 years working in the public, private and community sectors.

2.1 Introduction

Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group object to the transport proposals set out in the Sizewell C project DCO for very good reasons relating to the quality of life of residents over a 10-12 year construction period and a future legacy for the Suffolk Coastal district as a sustainable destination for rural tourism. We refer in particular to the Inspector's questions TT.1 as issued on 21 April 2021 in response to the 2020 DCO and subsequently amended DCO documents submitted by the applicant, which reflect changes to proposed HGV movements and mitigations.

2.2 Policy tests: compliance with Government policy and consistency with the Local Plan as a material consideration.

Our response is framed by two simple tests: whether the proposals have adequately mitigated substantial impacts on surrounding transport infrastructure in accordance with EN-1; and whether the proposals meet the reasonable expectations as set out in the Suffolk Coastal Local Plan, which, in the context of this being a national decision, we consider to be a material expression of local priorities.

Overarching National Policy Statement for Energy (EN-1)

National Policy Statement (NPS) Policy EN-1, subsection 5.13 Traffic and Transport acknowledges that the transport of goods, materials and personnel can have a variety of impacts on the surrounding transport infrastructure with potential economic, social and environmental effects. Therefore, the consideration of transport impacts is an essential *part of* the Government's wider policy objectives for sustainable development.

Paragraph 5.13.6 states that the IPC should ensure that the applicant has sought to mitigate transport related impacts, and that if measures are insufficient the IPC should consider requirements to address the shortfall including inviting the applicant to enter into relevant planning obligations or requirements.

The key national policy test is drawn from NPS EN-1:

- Has the applicant sought to 'sufficiently' mitigate the substantial impacts on surrounding transport infrastructure during the construction phase?

Suffolk Coastal Local Plan 2020 (East Suffolk District Council)

We believe that, whilst the DCO is determined by the Secretary of State in accordance with national policy and the 2008 Planning Act and not by the local planning authority, the Local Plan should nonetheless reasonably be considered at the very least to be a material influence in the DCO decision-making process, since it has been through a due process of evidence gathering, stakeholder engagement, policy development, examination and political decision-making.

Policy SCLP3.4 acknowledges that the Council is a consultee in relation to Nationally Significant Infrastructure Projects. In this role, the authority will take into consideration the nature, scale, extent

and potential impact of proposals for major energy infrastructure projects including their cumulative impacts over time and eventual decommissioning. Bullet (b) seeks appropriate packages of local community benefit to mitigate the impacts of disturbance caused to those communities hosting the major projects; and bullet (i) seeks appropriate road and highway measures (including diversion routes) for construction, operational and commercial traffic during the construction, operational and decommissioning processes. Bullet (m) asks for cumulative impacts of projects to be taken into account to ensure that there are no significant impacts in aggregate.

- Has the applicant included a sufficient package of measures of local community benefit (including legacy benefits) to mitigate the impacts of disturbance from raised traffic levels?
- Do the applicant's proposals provide adequately for appropriate road and highway measures (including diversion routes) to mitigate highway and community impacts?

Policy SCLP7.1 (c) states that development will be supported where "all available opportunities to enable and support travel on foot, cycle and public transport have been considered and taken". Bullet (f) in the policy seeks the integration, protection and enhancement of public rights of way, and bullet (g) seeks to reduce conflicts between users of the transport, i.e. pedestrians, cyclists and drivers.

- Do the proposals (sufficiently) take into account the need to consider all available opportunities to incorporate measures that will encourage people to travel by non-car modes? We would add 'freight by rail and sea' to this consideration.
- Does the SLR proposal deliver the "integration, protection and enhancement of public rights of way?"
- Will the development reduce conflicts between users of transport?

General performance against policy tests

We believe that the above policy tests are not met by the proposals or their mitigation on the following grounds:

- With the exception of two new train paths, the proposed package of transport mitigation does not take effect until the main construction phase commences. Prior to this, in the 'early years', there will be an unmitigated increase in all construction related traffic on the B1122, which will bear the brunt of the development impact, as referred to in Inspector's question TT1.95. We believe that this is contrary to EN-1 paragraph 5.13.6 as the main policy test, and is inconsistent with material Local Plan policies SCLP3.4 and 7.1.

Should the DCO be granted, we require conditions that the mitigation package is delivered to an agreed level prior to Early Years commencement of the works (from 2023); this includes construction of an SLR and reopening of the branch line passenger station at Leiston with regular shuttle train services. Compliance with our requirements would be consistent with the policy tests set out above.

- In the Early Years (and subsequently on the A12) development traffic will cause conflicts between road users, including fear and intimidation, contrary to the Local Plan policy SCLP7.1

described above. This is referred to Inspector's Question TT1.112 which states that Chapter 10 of the Environmental Statement does not take into account times when vulnerable road users may be present (noting school access / egress times, for example). Questions TT1.117 and 118 refer to fear and intimidation effects and pedestrian amenity which, inconsistent with Local Plan policy SCLP7.1(g), will not be mitigated on the B1122 by measures to improve pedestrian, cyclist and equestrian safety.

We require the applicant to undertake a new study which measures the likely impacts of its proposals at the most sensitive times – when most pedestrian and cycle movement is likely to take place, and to assess the decision not to build mitigations prior to the early stage of development at Sizewell.

- Construction of the SLR will itself create unacceptable levels of noise and disturbance combined with the aggregate impacts of additional heavy vehicle traffic including AILs and SLR construction vehicles on the B1122. Together, these impacts will lead to a likely measurable impact on the quality of life of residents. In addition, the travel plan fails to cover staff working at associated development sites, as highlighted by Inspector's question TT1.30. This fails to fully demonstrate that the proposals will be in compliance with EN-1 and consistent with material Local Plan policy considerations SCLP 3.4 and 7.1.

Should the DCO be granted, we require a study to inform necessary measurable updates to the travel plan and, wherever appropriate and practicable, full mitigation of all impacts including those arising from staff working on associated sites.

- In the early and subsequent years no effort has been made to consider opportunities to facilitate and encourage travel by active travel modes or by train even to the northern park and ride. Indeed, overall, it is proposed to make conditions considerably worse for people travelling on foot, cycle or horseback. During the main construction phase, only a few active travel measures will be introduced, including a ban on driving to the site from Leiston. The SLR as proposed will sever or unacceptably divert a number of public rights of way and also some existing lanes, including Pretty Road, as highlighted in Inspector's question TT1.97.

There are other grounds for objection too, as set out in more detail below with supporting evidence drawn from the applicant's DCO submission. However, we also set out the community's requirements for acceptable mitigation should the DCO be granted. These are included in the remainder of this representation.

As either stated or inferred throughout this document, Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group oppose the development of the new reactor (Sizewell C) for various reasons, including transport. Our opposition on transport grounds stems from the likely adverse impacts of additional motor traffic, including HGVs, staff and non-HGV service vehicles and overnight rail movements and the inadequacy of the mitigation measures proposed to protect the affected communities living in the district. The proposals will have a significant adverse impact on the valuable tourism industry which relies to a great extent on East Suffolk's peaceful rural landscapes, country lanes, heritage and character.

2.3 'Early Years'

Summary

We are opposed to the absence of any meaningful measures to mitigate additional traffic flows on the B1122 in the early years of up to 600 HGV movements per day in addition to other new traffic, and the failure to assess Early Years traffic impacts at the most sensitive times. Contrary to both NPS EN-1 paragraph 5.13.6 and inconsistent with what we believe are relevant and reasonable material intentions in Local Plan policies SCLP 3.4 and 7.1, the additional traffic will, in our estimation, have significant adverse impacts on four settlements (Yoxford, Middleton Moor, Theberton east and west and Westleton).

At the same time, the proposed SLR will be under construction in a process that will itself produce significant noise impacts and an additional 100 HGV movements per day on the B1122 over and above the 600 required for site preparation at the Sizewell plant. We have found little evidence presented so far of adequate mitigation to protect sensitive receptors from traffic noise and pollution, even though measures such as acoustic fencing and double-glazing would likely prove to be effective.

Should the DCO be granted, we believe that the applicant should enter into obligations and conditions requiring a package of mitigation measures to be implemented *prior to early works* commencing at the main application site. These include:

- The construction and opening of a SLR, the park and ride car parks and associated bus and rail services ready to operate on commencement of early works at the main site.
- Re-opening and extending the freight railway line ready to operate prior to commencement of the early works on the main site.

Early phase mitigation as proposed in the DCO

In the early phases of the development, in the first two to three years (2024-2027) prior to construction of the relief road and park and ride sites, there will be no mitigation provided by park and ride or bus services associated with the development proposals, and no relief road onto which to divert HGV and other site traffic. Indeed, the bulk of mitigation measures will be under construction during this period.

We believe that this situation does not meet the policy test in NPS EN-1 paragraph 5.13.6 which requires proposed developments at the national scale to mitigate substantial impacts on the surrounding transport infrastructure. It is also inconsistent with the material Local Plan which requires the mitigation of transport impacts including 'every opportunity' being taken to implement sustainable transport measures. We believe that the failure to mitigate all of the impacts arising from additional traffic on the existing road network prior to the early construction phase will result in significant cumulative impacts.

Our arguments that the key policy tests described in the first part of this submission are not met in the Early Years centre around the following issues:

- *Noise and disturbance:* Construction of transport mitigating measures including the relief road, park and ride, online improvements to the A12 and the impacts of additional traffic are proposed to commence during, rather than prior to, the first three years of construction at Sizewell. This means that residents of Middleton Moor, Yoxford and Theberton will be subject to increased traffic levels during this period as well as new noise and air quality impacts arising from the construction of the relief road and changes to B1122 junction layouts with the B1125 to enable an unwanted connection between the B1125 and the SLR. Impacts from additional traffic and construction noise will together have a severe detrimental impact on residents' safety and quality of life, amounting to 'surround sound' from all sides of some receptors. This is contrary to the intentions of NPS EN-1 as a whole and also the intentions of Local Plan policies SCLP3.4 and 7.1.

This situation could be substantially avoided if the SLR is constructed in advance of the early years' construction at Sizewell.

- *Traffic generation:* Traffic on the A12 will increase, with 85% of currently projected HGV traffic entering the B1122 from the south via Yoxford, and 15% from the north (Transport Assessment Addendum [AS-266](#) 8.2.45). This will have significant adverse impacts on residents in Yoxford who are already subject to heavy traffic on the A12. Furthermore, it will increase congestion, air pollution (NO₂ and PM) and road danger at the A12 / A1120 junction in the village which has very limited visibility for drivers turning right towards either Peasenhall (west) or Saxmundham (south). This is inconsistent with Local Plan policy SCLP7.1(g) with regard to conflict between road users. ES vol 2 ch 11 ES vol 10 ch 2
- *Access and egress from the B1122:* Residents' experience of living alongside the B1122 with current low traffic levels is telling. There are many unsafe junctions and entrances along the length of the B1122. Regular road users and residents have, over time, developed safety strategies based on the current low volumes of traffic. Mirrors are used, although these are frequently misted by rain, frost and dew. Another approach is listening for traffic, but the planned volume of traffic will prevent this strategy. Some residents cope by turning left onto the road and then turning around at the next safe opportunity rather than attempting a right turn across traffic. This situation may explain why an AECOM engineering study commissioned by Suffolk County Council estimated that an SLR would save a net 103 collisions and 158 associated injuries and fatalities.
- *Non-motorised modes:* The projected increase in traffic means that conditions for walking and cycling are likely to be severely affected. This is important since it is very clear that the tourism economy benefits from people travelling to enjoy the popular and well used rural road and public rights of way networks, including the B1122 itself, on foot, cycle and horseback and thereby to enjoy the landscapes and areas of natural beauty that are characteristic of the district. Contrary to EN-1 and inconsistent with Local Plan policy SCLP7.1(c), the proposals not only create barriers to active travel; they also fail to explore all

opportunities to implement measures that will encourage people to travel by non-car modes. The proposals fail to set out any measures to mitigate the impacts of the development with regard to safety and access by public transport, cycling and walking during the early phase of development.

We anticipate that the reality and perception of road dangers to pedestrians, cyclists and equestrians will increase. There are several sections of road with residential frontages but no footway, or inadequate unmaintained footways, and heavy traffic is not conducive to cycling or horse riding.

To support safer and more comfortable conditions overall, should the DCO be granted with no change to the proposed the use of the B1122 in the early years, we require camera-enforced 20mph village speed limits and a 40mph speed limit between the villages, together with extensive improvements and additions where necessary to pedestrian footways and crossings – noting that these will only ever serve as partial mitigation of the likely impacts.

Two of the issues outlined above – noise and traffic generation – are described in more detail as follows:

Noise

Noise has a minor, moderate or significant impact on people's quality of life and mental health, as described in the Environmental Statement Volume 6, Chapter 4 Noise and Vibration ([APP-451](#)) During the day, residents will be subjected to noise from the B1122 and SLR construction activities.

The document states that there is no means of aggregating road noise and construction noise since these are experienced in different ways (paragraph 4.6.10); even so, it ventures that the predicted significant effects are "unlikely" to combine with construction noise in a way that would change the significance of either of the two sources, since construction noise would be considerably more than the road noise, in other words, it would drown it out. However, even if the ES (at paragraph 4.6.11) is correct to say that the combination of construction and road noise does not add significance, we nevertheless put it to the applicant that the aggregation of all impacts adds up in total to a significant adverse effect on people's quality of life in this rural area – and that these impacts have not been taken into account. Indeed, Inspector's questions TT1.112, 113, 115, 116, 117 and 118 all refer to assessment times and impacts that are not adequately covered by the ES, including fear and intimidation from traffic, pedestrian amenity, and impacts at times when vulnerable users are most likely to be present on the network.

Relief road construction will add noise disturbance during the week, adding to increased ambient noise from the B1122, effectively surrounding residents with noise so that certain noise receptors have no 'quiet side', even if one side of any receptor experiences 'insignificant' noise impacts. The Environmental Statement ([APP-451](#)) sets out values for construction noise generation during two periods of construction – the site preparatory works and main construction phase. During construction, the site will operate six days per week (Mondays to Saturdays) from 0700 until 1900 hours. During the main construction phase, 29 of the 41 sensitive receptor sites will experience major or moderate adverse noise levels on Saturdays, and 18 of the 41 receptors will experience **significant**

noise effect during the week, taking into account differences in severity thresholds during the week and at weekends. Noise levels are considerably less during the site preparation period, with four sites affected at weekends and one during the week.

Traffic generation and impacts in the early years

Table 8.5 in the Sizewell C Project Transport Assessment Addendum ([AS-266](#)) suggests that compared with background traffic in 2015:

- At Theberton, there will be a 20% increase in traffic between 0800 and 0900, and a 51% increase between 17:00 and 18:00, including all vehicles and demand from Scottish Power. This translates, respectively, to an increase of 900 and 2,750 vehicles passing through the villages during these peak periods.
- Table 8.4 suggests that over a 24-hour period on the B1122 traffic will increase from 6,050 vehicles (2023 reference case) to 7,900 vehicles, an increase of 1,850 vehicles or 30.6% at Theberton and from 4,150 vehicles to about 5,375, an increase of 1,225 vehicles or 29.5% – significant increases that will have substantial adverse impacts on quality of life in Yoxford, Middleton Moor, Theberton and other locations on the B1122 where the route passes close to people’s homes. The B1122 carriageway is narrow, typically 5.5m-6m wide, with intermittent footways, and blind hills and tight bends.
- At Yoxford (site Y), there will be a 7% increase in traffic between 0800 and 0900, and a 16% increase between 17:00 and 18:00 including all vehicles and demand from Scottish Power. This translates, respectively, to an increase of 80 and 200 vehicles during these periods. We are not certain that the representative times used are actually peak travel times with regard to shift changes and operations.
- Table 8.4 suggests that over a 24-hour period, traffic on the A12 at Yoxford will increase from 15,700 (2023 reference case) to 17,350 vehicles (high estimate), an increase of 1,650 or 10% over and above an already high traffic flow, adding to road danger at the A12 / A1120 junction with its limited stopping sight distances. It is already reported that flows regularly exceed the capacity of the single carriageway road at peak times with congestion extending over 350m from the B1122 junction without the proposed increased Sizewell C traffic.
- Meanwhile, due to the 24-month construction of the relief road, a further 200 HGVs (total two-way flow) will pass along parts of the B1122 between Yoxford and Leiston each day. These will be involved in all earth moving and construction activities.

The Environmental Statement ([APP-198](#)) at paragraph 10.3.11 classifies increases in traffic flows of above 30% as being perceptible and therefore subject to impact assessment. Below this level, the impact is considered imperceptible and is therefore not assessed. Flows very close to this magnitude will be experienced in one direction at Theberton.

The ES also measures the magnitude of transport based on seven criteria, namely severance, driver delay, pedestrian delay, pedestrian, cyclists and equestrian delay, fear and intimidation, collisions and safety, and hazardous loads (Doc 6.3, table 10.2). Only 'severance' and 'fear and intimidation' have clearly classified objective levels; the remainder are classified as either 'very low impact' or 'subject to judgement'.

It finds that across the rural areas affected by the proposals there are mostly related to there being instances of no pedestrian footways alongside carriageways that may be carrying increased traffic volumes including HGVs. This is particularly the case with the B1122 and its tributaries which will be carrying additional traffic in the 'Early Years' due to construction of the SLR. Our observation is that the footways which do exist are narrow, interrupted, often missing where there is frontage development, and largely unmaintained: they are not generally suitable for particularly vulnerable members of the community, namely young children, older people, and disabled people with restricted mobility.

2.4 Sizewell Link Road

Introduction

The SLR (applicant's preferred alignment) is proposed as part of the integrated package of measures to mitigate flows of additional vehicular traffic during the main (later) phase of construction and to provide access in legacy thereafter.

The requirement for a link road to protect villages from additional traffic is consistent with EN-1 and was established late in the public engagement phase. A link road is accepted in principle by Stop Sizewell C, Theberton & Eastbridge Parish Council and the B1122 Action Group as an essential component of the Sizewell C project, should the DCO be consented, but this is not the route that they consider would have the least damaging short and long term impact and have the greatest potential for legacy.

The road is intended to provide a connection to the construction site for day workers and heavy goods vehicles. The main alignment runs south-eastward from the A12 south of Yoxford with spurs linking to the B1122 and A12 north of Yoxford and the B1125 from Westleton which will be used mainly by cars. In effect, the SLR provides western and southern bypasses for Yoxford, Middleton Moor and Theberton.

Theberton and Eastbridge Parish Council believe that connecting the B1125 to the SLR will encourage additional traffic to use the B1125 from the north increasing impacts in Middleton and Westleton. This connection will introduce a staggered junction between the existing B1122 and the B1125 and given the early years use of the B1122 for traffic to the site will be a major disruption in both the short and long term. Removing the connection will likely encourage all traffic from the north to use the A12, new Yoxford roundabout and link on to the SLR.

The SLR is proposed to provide the principal route for park and ride buses arriving from Ipswich and Darsham as well as freight traffic and other vehicles going to and from the Sizewell application site and temporary site workers' accommodation situated to the south-east of Eastbridge, which will include a 1,400 space multi-storey car park. There will be traffic movement associated with

employees when they are not working on site – these may be in the evenings or at other times between shifts, or on ‘days off’.

Our principal objections to the mitigation as proposed are as follows:

- Inadequacies with the chosen alignment, which duplicates the existing B1122, within 150m in places, and would therefore leave no useful legacy for local communities upon completion of Sizewell C. In this regard we agree with the Highway Authority and contend that it provides poor value for both impact and money. Insufficient attention has been given to the possibility of an alternative route from the A12 south of Saxmundham.
- The design of the SLR, which is to be constructed to DMRB standards with a design speed of 60mph, is characterised by engineering features that are visually inappropriate in an area of locally acknowledged landscape value. These include multiple embankments up to 3.5m high and cuttings up to 3.5m deep for approximately 80% of its length. We believe that this level of engineering is excessive, and that a more sensitive and appropriate solution should be found – but it does underline the principle that the B1122 is wholly unsuitable for the type of traffic the SLR is currently designed to accommodate.
- The road design creates effective severance or diversion of public rights of way and several lanes which are popular and well used by local people and form part of the area’s innate appeal to tourist visitors. A total of 12 public rights of way are affected, with a number diverted quite some considerable distance from their current alignments. We contend that the longer diversions, of between 100m and 250m, are unlikely to be attractive compared with the current alignments through open countryside, and this is unacceptable given the importance of footpaths (at least one of which is promoted as a recreational circuit by Suffolk County Council) and also Local Plan policy SCLP7.1.

Proposed alignment

On the face of it, the selected alignment makes some sense since it acts as both a bypass for the affected villages and as a collector for traffic arriving via various routes. However, it is the joint view of Suffolk County Council, Theberton, Middleton and Yoxford Parish Councils, Stop Sizewell C and Theberton & Eastbridge Parish Council and the B1122 Action Group that the adverse impacts of the proposed road outweigh the benefits, even though the preferred alternative route might add some add traffic to the B1122 for the full 10-12-year construction period.

The road will create a barrier dividing the parishes of Theberton, Middleton, Yoxford and Kelsale, splitting outlying homes and farms and creating a ribbon of unusable small fields between itself and the B1122 – in an area with good agricultural land.

The road will also have a greater impact on heritage assets than EDF suggests.

We agree with Suffolk County Council, East Suffolk District Council and Create Consulting (acting on behalf of landowners) that weak and insufficient evidence had, at the time of their relevant representation, been submitted to the examination by the applicant regarding alternative alignments

for the link road, particularly those alternatives which start to the south of Saxmundham. The document, AECOM Sizewell C Proposed Nuclear Development Peer Review of Option Selection for SLR, prepared for EDF Energy in April 2019 appears biased towards the chosen 'route Z' underplaying the magnitude of impact on sensitive noise and air quality receptors. It claims a non-existent 'legacy benefit', while giving emphasis to relative visual impact as means of dismissing other options, particularly a route 'W' which is favoured by the community and takes an alignment starting south of Saxmundham. The report's conclusions were based on a scoring system that, in the Highways' Authority's view, was not sufficiently evidence-based and therefore, not 'considered sufficiently robust'.

The review does not consider the opportunity of deliver an alternative alignment and road that will assimilate more successfully into its surroundings, which is designed with due consideration of police concerns about HGV movements and road danger and which provides a positive and, above all, useful and adoptable legacy for Suffolk coastal communities in exchange for undoubted ongoing impacts while serving 'Energy Coast' projects and Sizewell's operational requirements once the reactor is complete. It is convenient for the case made by the applicant that the road is proposed to be designed to DMRB standards when a more sensitive design would be more fitting in its rural context. If the B1122 can be used, highly inappropriately, in the early years, why can't an enhanced, safer and more appropriate and sensitive design of a rural B road be used as a new SLR for Sizewell C construction and subsequent operation?

The case for an alternative alignment constructed to enhanced 'rural B road' standards (with a lower speed limit) is strengthened by proposed changes to the freight strategy ([AS-280](#)) and the HGV limits set out in the Construction Traffic Management Plan ([APP-608](#)), now reflected in the Transport Assessment Addendum ([AS-266](#)), which suggests that as a result of the preferred expansion of the BLF and increased rail traffic, HGV movements will be at the reduced rate of 500 movements per day during the peak construction period (100 fewer than in the early years) and a maximum of 700 movements on the busiest days, with 85% of HGV traffic arriving from the south. Overall, this changes the modal share of HGVs from the 60% assumed in the DCO to 40% (or a range between 30% and 50%). HGV flows will be significantly less than proposed in the original application with a reduced effect on the road network. The BLF is anticipated to run at 70% of its potential capacity, taking into account seasons, weather and other stoppages.

Reduced HGV traffic on the SLR provides a greater opportunity to design a road of rural character that is better assimilated into the landscape, and which can avoid sensitive receptors. The reduction of HGV flows overall includes a possible proportionate reduction in the number of HGVs arriving from the north, making their impact on the B1122 more acceptable if the SLR is routed from the A12 south of Saxmundham. However, as the Inspector points out in question TT1.94, it is not known where other, non-HGV vehicles will come from.

In its analysis of previous road options, the B1122 Action Group noted that in terms of impacts on households and landowners, 'Route W' had a number of clear advantages over and above 'Route Z':

Receptors	'Route W' North	Sizewell Link Road (Route Z)
Homes within 50m	0	2
Homes within 250m	3	33
Listed buildings within 750m	41	46
Length (new road)	8 km	7 km
Travel distance from south (Friday St roundabout to site entrance)	10 km	15 km
% share embankments and cuttings	c. 20%	80%
Special Landscape Areas (SLA)	Passes c200 m north of SLA	Abuts SLA in 2 places
PRoW affected	12	11
Community legacy value	Substantial	Nil
Utility for other energy projects	Substantial	Very limited

If the DCO is consented, we require the applicant to undertake a detailed review of options to construct the link road from the south and a design which is better assimilated into the rural landscape, which leaves a positive legacy for the Suffolk Coastal sub-district.

DMRB engineering design

We strongly object to the proposed design of the SLR (all options) "to DMRB" standards. On the basis of projected reductions in HGV traffic during the main development phase, we believe that *should the DCO receive consent, a road design that is more fitting in its landscape context should be possible subject to safety auditing the careful application of measures including lower speed limits, maximum corner radii, stopping sight distances and appropriate carriageway widths.*

This would substantially address the acknowledged visual and other environmental impacts of the 'full' DMRB design that is proposed, whilst providing a stronger legacy for local communities and the

tourism industry without adverse impacts on road safety. A cycle track that may also be used by pedestrians, designed to LTN1/20 standards and properly surfaced, should be included within the highway envelope, perhaps behind a hedge. We recommend that the road operates within a design speed and maximum speed limit of 40mph throughout.

Traffic generation

The Transport Assessment Addendum ([AS-266](#)) provides information about projected traffic levels on the B1122 in the Early Years, including a 2023 'reference case' which takes into account background traffic growth in 2023 as a baseline. We have used the 2023 baseline to calculate the increase in traffic overall and also on the B1122 if an alternative route for the link road is implemented.

Table 8.4 provides the 2023 baseline and additional 24-hour traffic levels on the B1122 prior to construction of the SLR. Early Years projected traffic increases between 0800 and 0900, and 1700 and 1800 are expressed as percentages in table 8.5 - see our section 6.42(3) above.

Table 8.6 provides projected 2028 'peak' traffic flows with the SLR at key points on the network including the SLR. However to give a broader picture, we have used the 2023 reference case from table 8.4 to calculate residual traffic on the B1122 should the SLR be built on an alternative alignment:

- At site (R), B1122 east of Yoxford, traffic levels are expected to increase from 4,150 in the 2023 reference case to 4,600 vehicles, including 750 Sizewell C vehicles and 50 Scottish Power vehicles. This is an overall increase of 450 vehicles per 24 hour period on this stretch between Yoxford and the B1125 west of Theberton.
- At site F, the B1125 at Westleton, traffic levels will increase from 2,700 vehicles to around 3,225 vehicles, including 350 Sizewell C vehicles and 100 Scottish Power vehicles. This is an increase of 525 vehicles.
- The total traffic increase on the B1122 at Theberton would therefore be 975 vehicles. It should be noted that the 2028 'reference case' probably includes natural traffic growth as well as traffic added by the early stages of development, but this is not made clear in the assessment.
- If route Z is implemented, traffic on the B1122 at Theberton would reduce from 6,050 vehicles in 2023 without the SLR to 500 with the SLR in place.

Should the DCO be consented, the community is content that the additional projected traffic flows on the B1122, if correct, are acceptable for the full construction period as an exchange for constructing the SLR prior to early stage development and on a different alignment starting south of Saxmundham.

Noise and pollution

Please refer to *Proposed transport impacts: early phases* above. The impacts relate to road construction activity on sensitive receptors, aggregated with the various impacts of additional 'Early Years' traffic on the B1122. Note that the applicant has relied for its data on national standard SOAEL noise levels which will not take into account prior noise levels in the area.

However, the road itself, once complete, would present ongoing impacts on sensitive receptors since it is proposed to be used for extended operating hours. This will affect at least 35 homes within 250m of the route, which may be classified as sensitive receptors. Due to refraction (the movement of sound between warm air and cool air causing a shortening of sound waves), the impact of noise and disturbance will be greater at night.

Severance

Active travel is an important component of East Suffolk's tourism economy, with our observations noting that cycling and walking are particularly popular due to the network of lanes and public rights of way. Taking into account other impacts, the proposals will make the area less attractive to visitors, and the loss of public rights of way will have an adverse impact on the health and wellbeing of walkers, cyclists and equestrians at a time when inactivity and obesity are directly associated with one in six deaths in the UK, the highest rate in Europe

<https://www.gov.uk/government/publications/physical-activity-applying-all-our-health/physical-activity-applying-all-our-health>

Many footpaths in and around Sizewell are interlinked. Removing and closing important path arteries such as Bridleway 19 removes access to permissive ways once owned by the Forestry Commission as part of Dunwich Forest and granted in times before the applicant became influential in the management of this land. Goose Hill, Kenton Hill and footpath 21 to the beach inexorably diverted, in some cases blocked, in some cases access lost forever.

Horse riders, cyclists and walkers use these amenities intensively. Their loss or temporary closure would be a massive loss to the community. Many ancient hedges along FP19 are very valuable to the landscape and contain many veteran trees.

The proposed SLR and the rail extension will effectively block and stop up BR19 by traversing it. BR19 serves grade 2 listed Upper Abbey Farm and Ashwood Cottages and is known as an ancient part of the Black Walks. This possibly connected many hundreds of years earlier Leiston Abbey with Dunwich, a once thriving port, via FP 20, Eastbridge to the beach sluice, or alternatively diverting half way along to the main ancient Dunwich Highway. BR19 is an ancient historic footpath as signified by the number of established and historic hedgerows and trees a habitat for bats, insects, larger mammals and birds.

Document 2.4 ([AS-113](#)) provides maps of PRoW diversions and stopping-up that will be caused by the DMRB design of the proposed SLR. The longer permanent PRoW diversions required are between 100m and 270m with several very convoluted routes being offered instead, including two instances of a highway being converted to a footpath. This is strongly inconsistent with East Suffolk Local Plan policy SCLP 7.1(f) which seeks the integration and enhancement of the public rights of way network. The diversions and stopping ups would have an appreciable and unacceptable impact on the enjoyment of the countryside and the public rights of way network as well as undermining efforts to encourage and facilitate more active travel for recreational, tourism and utility purposes. Taken together, this amounts to a potentially serious impact on the attractiveness of the area and therefore the viability of hospitality and other businesses that depend on tourism revenues – when these businesses may already be struggling to emerge from the Covid-19 pandemic.

Similarly, document 2.4 also maps a number of rural lanes that will either be stopped-up or diverted onto staggered or single-armed priority junctions with the SLR, reducing local permeability and further affecting the continuity of the network for pedestrians, cyclists and horse riders. Whilst it is understood that safety is a key driver of these changes, the proposals fail to consider mitigations or a positive future legacy of the road scheme for local communities and will have a serious barrier effect during and after construction. Given the local importance and indeed the heritage of Suffolk's dense network of attractive rural lanes, this situation is unacceptable and inconsistent with the Government's broader stated intentions for sustainable development referred to in NPS EN-1 and Local Plan policy SCLP3.4(b).

Heritage

In the Heritage Assessment, consultant Richard Hoggett found that, in considering the applicant's comparative assessment:

"The comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W [previously presented] reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from EDF Energy's reckoning of the total number of affected Listed Buildings and their grades. This inclusion of these figures alters the picture somewhat, and suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined.

"The comparative assessment [as presented at the time] has indicated that while the likely heritage impacts of Route Z and the northern version of Route W are superficially very similar, when the study area of Route Z is calculated appropriately, the southern variation of Route W has the least heritage impact, with the northern variation of Route W also having a marginally lesser heritage impact than Route Z."

2.5 Active travel

A number of measures are introduced to support walking cycling, as outlined in the Construction Worker Travel Plan (document 8.8). Combined with providing accommodation close to the worksite, these measures are welcome in principle as they will connect the site to where people are living and they will leave a useful and positive legacy for the community. Additional active travel measures are proposed in Leiston and a s.106 fund is offered to support active travel around Wickham Market. However, the measures have a number of shortcomings that will undermine the good intentions of the travel plan:

- From the drawings we have seen, the proposed cycleways do not meet the layout or geometric design requirements set out in Local Transport Note 1/20 and CD1/95. Experience shows that 'shared use paths' do not attract cycling, and neither cyclists, pedestrians nor equestrians like sharing the same space, so, wherever possible, segregated infrastructure should be specified. Many of the proposed shared use paths are directly adjacent to carriageways and heavy traffic when a soft buffer should be provided both to assist perceptions of safety and to 'catch' road grit and other debris. At junctions it is clear that

active travel infrastructure has been ‘retrofitted’ onto the proposed DMRB designs which owe more to prioritising motor vehicles than emphasising the role of active travel in reducing congestion, health and climate impacts.

We believe that poor design of active travel infrastructure is unacceptable given the availability of comprehensive design guidance. Therefore, *should the DCO be consented, we require a condition that the applicant must review the designs in line with Government guidance in LTN1/20 and CD1/95 as a minimum standard for implementation consistent with Government policy.*

- There is no proposed active travel infrastructure to provide mitigation for existing communities against likely heavy traffic. Existing footways are in poor condition and mostly absent, with particular issues of missing footways along built frontages. This reflects our wider concern that the area will become less attractive to visitors who enjoy exploring the sub-district by active modes of transport.

For example:

- Nothing is proposed in the early stages to mitigate the impacts of increased motor traffic on the B1122 in the absence of a link road, park and ride and other travel plan measures. Conflict along the B1122 will increase, leading to a higher risk of conflict between drivers, pedestrians, equestrians and cyclists using the route.
- No provision is made on the proposed SLR or its crossings to safely accommodate active travel modes except near to the Sizewell C worksite. This includes a failure to maintain accessible routes across the road where local lanes have been stopped up (which may also be contrary to the Equality Act 2010 with regard to disabled users).
- The design of roundabouts and other junctions would leave vulnerable road users exposed to unpredictable, fast-moving vehicles on all arms, making it impossible to cross safely. There is no reason for junctions to be designed in a way that gives such a level of priority to motor vehicles that vulnerable road users are essentially designed out.

In Cambridge, failure to deliver active travel infrastructure in accordance with the provisions of LTN1/20 has been used in support of a planning refusal in respect of a major development close to the main railway station (Planning reference 18/1678/FUL – notes of committee meeting here: <https://democracy.cambridge.gov.uk/ielIssueDetails.aspx?Ild=24651&Opt=3>). We trust that impacts on active travel will be taken into consideration by the Inspector.

Should the DCO application be consented, we require the following additions supported by a comprehensive Local Cycling and Walking Infrastructure Plan that meets the requirements of Local Transport Note 1/20, which:

- *Establishes and audits existing networks and conditions for safe walking, cycling and horse-riding activity (non-motorised users – or, as described here, ‘active modes’). This includes the*

network of existing lanes, roads, PROWs and walking core zones (near to town centres and major walking trip generators).

- *Identifies new links in the network to overcome barriers and respond to desire lines.*
- *Establishes a delivery programme of prioritised works to be delivered prior to early construction to serve the Sizewell campus that will leave a suitable legacy for communities following completion of Sizewell C, comprising measures including:*
 - *Quiet lanes.*
 - *Improved and extended rural footways.*
 - *Accessible bridleways and footpaths with some sections hard-surfaced to enable utility access on foot and cycle.*
 - *Junction treatments that enable active travellers to safely interact with major roads when crossing or turning into junctions.*
 - *Segregated active travel ways on main roads including the proposed SLR (shared surfaces outside of built areas, and segregated walking and cycling infrastructure within built areas)*
 - *Grade separated and / or controlled active travel crossings and other means of crossing major road barriers without requiring unacceptable deflections from desire lines. This includes designing major roundabouts to LTN1/20 or CD1/95 standards, rather than traditional DMRB layouts, incorporating pedestrian and cycle crossings on all arms. **Note** that, in fact, CD 1/95 is now part of DMRB and is therefore mandatory.*

2.6 Rail alternative – uncertainties which may lead to increased road traffic

The applicant proposes an increase in the frequency of freight train movements to facilitate bulk material imports by rail. We note the continued uncertainty regarding Network Rail. We are also fully aware that what may have the potential to reduce impacts on one community to a limited extent, would impose them upon others, especially the antisocial and weekend hours suggested. We see no contingency plans about what would happen if there were engineering works or faults on the main lines that would affect these deliveries. Would materials revert to HGV delivery?

We continue to be disappointed that insufficient confidence can be applied to these changes after nearly ten years of planning and consultations. EDF have had plenty of time to generate a plan with Network Rail that provides certainty as to what is possible and yet in Network Rail's Relevant Representation, they still cite lack of clarity on EDF's proposals as a reason for being unable to reach any sort of conclusion.

2.7 Beach landing facility (BLF) – uncertainties which may lead to increased road traffic

The applicant proposes enhancement of the permanent Beach Landing Facility (BLF) and a new temporary BLF (jetty) to enable material imports by sea. There is a lack of detailed information about the potential impacts of the temporary BLF and the enhancements to the permanent BLF on coastal processes. The high-level conveyor across the beach would further damage the AONB landscape. As above, we see no contingency plans about what will happen if prolonged adverse weather conditions affect deliveries. Would materials then revert to HGV delivery?

The long-requested reduction in HGV traffic along with better utilization of rail and a request for delivery by sea have been made by a variety of consultees. We understand the reasons for the earlier rejection of the substantial jetty structure for environmental and coastal impact, given results from modelling and the impact on longshore drift that was experienced from jetty use for the Sizewell B development.

Any temporary Beach Landing Facility (BLF) needs to provide a significant and workable reduction in HGV traffic within the capacity of the construction site to stockpile delivered materials alongside whatever increase in capacity is achieved through increased rail deliveries. This must be achieved with little or no impact on coastal sediment transport either to the north or south of the site, in particular for Thorpeness and Aldeburgh where there are already significant coastal erosion issues. Any structures that result in sediment accretion at Sizewell in the predominantly north to south sediment transport regime is unacceptable.

Conclusions

Stop Sizewell C, Theberton and Eastbridge Parish Council and the B1122 Action Group conclude that the applicant has failed to consider the scale of combined and cumulative impacts from its approach to delivering the requirements of National Policy Statement EN-1 paragraph 5.13.6. This includes the failure to deliver mitigations prior to the early stages of site development at the Sizewell facility as well as traffic from the Scottish Power Renewables onshore development at Friston, other wind farm expansions and interconnector infrastructures; resulting in substantially increased traffic flows on the B1122 for three years (or longer if there are legal challenges to the relief road CPO).

Whilst the Local Plan may have very limited material influence over this national decision, it nonetheless includes important contextual policies that seek to deliver sustainable development whilst protecting the communities of East Suffolk from harms caused by major development. The proposed mitigations and their timing are, in principle, inconsistent with the Suffolk Coastal Local Plan.

We therefore conclude that the proposed mitigations as they stand are inconsistent with or fail the policy tests outlined at the beginning of this representation by reason of their timing, impacts and failure to deliver community benefits.

We object to the Sizewell C development, however if the DCO is granted, the agreements we require are as follows:

- *The applicant should be bound to deliver the package of mitigations including a link road, park and ride, online improvements to the A12, green rail route and confirmed rail paths prior to commencement of the early works at the main Sizewell power station site and at the proposed Eastbridge Accommodation Campus.*
- *The link road should be constructed on a different and less impactful alignment from south of Saxmundham. It should be designed in such a way as to better assimilate into the landscape,*

avoid sensitive ecological and noise receptors, and it should deliver a legacy of long-term value to current and future residents of East Suffolk.

- *The applicant should confirm and commit to the reduced HGV movements and assess the impacts of traffic increases at the most sensitive times with a view to mitigating these impacts, particularly along the B1122 and the A12 at Yoxford.*

The combined Stop Sizewell C, Theberton and Eastbridge Parish Council and B1122 Action Group position, as expressed in four previous consultations and as set out in Stop Sizewell C's [Relevant Representation](#), remains unchanged by recent amendments to the DCO including accompanying environmental statements and changes to mitigating measures. Our opposition to the project is unchanged due to unresolved uncertainties as follows:

- There is no guarantee that the proposals consulted on can be delivered. We consider it inappropriate to seek approval for options that the applicant cannot express certainty about whether they are possible, and we further find it astonishing that given the consistent expressions of concern, for example over traffic, for the last 8+ years, new ideas should only be forthcoming at this time.
- The new proposals, even if they prove to be deliverable, do not make the project acceptable. The proposed development remains the wrong project in the wrong place, on a fragile coastline, surrounded by rare designated and sensitive habitats and impossible to deliver without unacceptable impacts on local communities.

3 Community Safeguards should DCO be granted

3.1 Sizewell Link Road (SLR)

- Together with other components of the transport mitigation package, the SLR shall be constructed and opened prior to commencement of the early works at the Sizewell site.
- that the SLR as proposed shall be removed by the applicant following the period of construction of Sizewell C. Arrangements for funding of this work to be established by way of an appropriate legal agreement and/or endowment before commencement of the development.
- that land taken by the proposed SLR shall be restored to its original condition and use and to a standard agreed by local communities and landowners as well as the Local Planning Authority.
- the design of the proposed SLR should reflect recognised highway standards related to safety, and it must include separate infrastructure for use by bicycles, pedestrians, people with mobility difficulties and equestrians constructed to the standards set out in Local Transport Note 1/20 as a minimum.
- the applicant shall fully fund the maintenance of the proposed SLR for the period of its use.
- the applicant shall give due consideration to the impacts of community severance as a result of the construction of the proposed SLR and design the road accordingly e.g. SLR to bridge over or under minor roads (e.g. Pretty Road) to maintain local permeability and accessibility.

3.2 Planning Act 2008 – Section 88 Initial Assessment of Principal Issues

The following list of recommended community safeguards is mostly based on the Initial Assessment of the Principal Issues prepared under section 88(1) of the Planning Act 2008 (PA2008). The ExA says that *it will have regard to all important and relevant matters during the Examination and when it writes its Recommendation Report to the Secretary of State for Business, Energy & Industrial Strategy after the Examination has concluded*. Stop Sizewell C and Theberton & Eastbridge Parish Council believes that these matters cover many of the issues that need to be addressed as planning conditions and legal agreements between appropriate parties should Development Consent be given

3.3 Traffic and Transport – to include:

- Effectiveness, enforcement and monitoring of the Transport Strategy and site travel plan, including consideration of movement of people and freight by mode of travel and the extent to which it meets the requirements set out in the Local Plan
- Robustness of the Environmental Statement with regard to measuring impacts at the most sensitive times, i.e. when people are most likely to be using the B1122 and other roads on foot and cycle.
- Suitability of the Transport Assessment and modelling approaches.
- Effects on local road networks and roads, including access, congestion, road danger and disruption.
- Effects on emergency services.
- Effects on the Strategic Road Network (SRN).
- Effects on PRow and Non-Motorised User (NMU) routes
- Effectiveness of mitigation and control measures, monitoring and enforcement.
- Consideration of effects of other developments.

3.4 Air Quality

The Local Planning Authority and Public Protection departments need to be in a position to ensure that the applicant addresses local Air Quality through

- its air Quality impact baseline assessment methodology;
- dealing with effects on air quality arising from dust and particulates during the construction phase including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;
- dealing with effects on air quality arising from dust and particulates during the operational phase including through changes in vehicular activity and changes in distances between sources of emissions and air quality sensitive receptors;
- mitigation, monitoring and control measures for air quality, dust suppression, control and use of equipment/plant and construction traffic management and how such matters would be secured and enforced including by the Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP);
- dealing with effects on air quality arising from dust and particulates during the decommissioning of the Proposed Development including through construction activities, emissions from construction traffic and equipment/plant and changes in traffic flows;

- the adequacy of the environmental measures incorporated into the design and mitigation proposal and whether all reasonable steps have been taken and would be taken to minimise any detrimental impact on amenity from emissions.
-