

## A precis of oral representations made by Ian Galloway at ISH2 and ISH3 (Traffic & Transport Parts 1 & 2).

Wednesday 7<sup>th</sup> and Thursday 8<sup>th</sup> July 2021.

**Note:** further detail and explanatory notes are incorporated.

### OVERVIEW

My name is Ian Galloway and I am a resident of Kelsale-cum-Carlton, one of the largest (by size) Parishes in Suffolk. For some unfathomable reason the Applicant persists in referring to the Parish as either “South of Yoxford” or “Saxmundham”. This is not helpful in engendering a strong working relationship and is viewed by many residents and Parish Counsellors as deliberately discourteous and needless.

Following the Site Visits in June, members of the Panel will be aware Kelsale-cum-Carlton is also the point where the proposed SLR departs the A12 going ‘off road’ and cutting a swathe East across prime farmland and multitudinous wildlife habitats.

Eight years ago when I was asked to assist the Parish Council in responding to the early Pre-Application Consultations, I was at a loss to see how what we now know as the SZC Project, could ever be constructed without significant investment in enabling road, rail and/or sea infrastructure. Something I now know the Applicant thought could be largely addressed by minor tinkering with the A12 and the B1122.

However, it was the site of huge construction vehicles on low-loaders, tyres off, negotiating the urban streets of Somerset towns that really crystallised in my mind how absurd the situation might become in Coastal Suffolk, should the Applicant gain consent for a similar behemoth at Sizewell.

Subsequently I have shown, what some may regard as an unhealthy interest in the A12, the traffic using it, events on and around it, its’ general health and how it is maintained.

I would refer the ExA to my earlier written representation ‘Sustainable Transport’ for a more traditional examination of some of the Traffic and Transport issues.

For the sake of brevity, I will largely confine my observations to a section of the A12 between the Applicants proposed Park and Ride sites, a stretch of road almost entirely comprised of single carriageway, with the notable exception of the dual carriageway between the A1094 to Aldeburgh and B1121 at Benhall.

In particular, I would like the EXA to consider the impact on this stretch of road when the combined traffic of several energy projects, encounter any of the following events:

A steam traction engine towing a workers bunkhouse	A car driver repairing an offside punctured tyre
A low-loader carrying a 2-6-2 steam locomotive	Mobile hedge cutting by a 4WD tractor and flail
A potato harvest convoy comprising: 4 x self-propelled Grimme harvesters, 4 x tractor & 10 tonne tipping trailer combos, front & rear escort vehicles, a 10,000 litre water bowser, a 2,000 litre diesel bowser & a domestics trailer.	
A horse drawn Romany Caravan	Tree surgery (climber/picker) from the carriageway
A jack-knifed articulated lorry	A partial lost load of grain across the carriageway
A lost load of steel reinforcing rods requiring a mobile crane and second lorry to transfer the load onto	
An immobilised fuel lorry in the carriageway	Traffic attending/leaving Motocross at Blaxhall
Traffic attending/leaving Folk East at Glenham Hall	An overturned caravan and towing vehicle
A Sunseeker 74 Sport Yacht on low-loader with escort vehicle	A moderate flock of sheep
Removal of a large bulk carrier from a roadside ditch	Traffic attending/leaving Latitude
Planned carriageway repairs	Unplanned carriageway repairs

The foregoing is by no means an exhaustive list of events, it is however illustrative of the breadth of things that do impact on the A12 over and above the generic issues of; Orwell Bridge closures, flooding, seasonal visitor traffic increases, Bank Holidays, minor traffic accidents, police incidents, large groups of cyclists, car/lorry/agricultural/horse-drawn traffic turning across flows, drivers giving 'blue light' emergency service vehicles priority, pedestrians on or adjacent to the carriageway, dangerous driving, serious traffic incidents, road closures, temporary traffic signalling, air ambulance attendance, diversion off the A12, driving without due care, etc.

There are a great many issues arising from the A12 being the only viable north/south route through East Suffolk, not least of which is; **it is a single point vulnerability** with no clear or adequate resilient routing for the; current, anticipated or forecast SZC traffic volumes and/or the profoundly changed traffic flow composition.

It is however, **the backbone and critical network** for all East Suffolk residents and businesses, an enabler not only to movement within the coastal Suffolk area, but also vital for; goods and services, agricultural produce (transport and supplies), travelling further afield to; gain access to critical and personal services, places of work, the trunk road network, international travel access points, etc.

In summary, **the effective functioning of the A12 is the lifeblood of the whole of the East Suffolk area** and so to 'hold it hostage to fortune', risks irreparable damage to the well-being of; individuals, communities and businesses throughout the area.

I urge the ExA to review the experiences of people in Somerset with regard to the impacts of traffic and transport on their daily lives and then imagine how East Suffolk might struggle to cope with potentially even more than that (in combination with other energy projects, should they gain appropriate permissions and consents).

This is not about "snobs and jobs" and other scurrilous epithets circulated by those who cloak themselves in anonymity in order to continue maligning those who really care about the survival of East Suffolk in the face of; an impending inundation of roads and lanes by construction related traffic on a virtually constant basis for at least 12 years.

## **1. SIGNIFICANT ISSUES & COMMENTS MADE AT HEARINGS ISH2 AND ISH3**

**1.1 Freight Management Strategy** – it is a somewhat pyrrhic victory to hear that there is to be no 5<sup>th</sup> train a day and then hear of (given the reliance on rail and sea to avoid all the potential excesses of a maximum HGV thread within the overall strategy) the narrowness of some margins that the Applicant is reliant on to; ensure the Rail thread of the strategy can meet the tonnage levels previously stated as 'essential'.

It is noted that ESC are assuming the 'noise' issues are resolvable, however there is little evidence available publicly to substantiate the faith they are showing in the Applicant, let alone any suitable mitigations for the vibration impacts accompanying the noises, especially as SZC Freight trains are likely to be limited to 10mph, as suggested at Hearing 1.

From my perspective, Mr Lovelock's observations in respect to the wider network and 'points of origin' exemplify the omissions of the Applicant in consulting properly on their proposals, the complexity and vulnerability of their strategy, all points I am sure won't be missed by the ExA.

**1.2 ‘Early Years’ HGV movements** – commentary by the Applicant in respect to HGV movements to and from the Main Development Site and the ‘caps’ applying to them in the ‘early years’, were less than enlightening and did little to enable the layman to unknit the quirks of what seemed an unnecessarily complex presentation.

Consequently, I would ask that the ExA seek to obtain from the Applicant ‘Early Years’ monthly projections of the volume of ‘HGV’ vehicle movements (as defined by the Applicant), breaking them down into some (or all) of the standard Department of Transport categories below;

Light Goods Vehicles	[2 axles to 3.5 tonnes]
Smaller 2 axle lorries	[2 axles from 3.5 to 7.5 tonnes]
Bigger 2 axle lorries	[2 axles from 7.5 to 18 tonnes]
3 axle lorries	[Rigid or Articulated to 26 tonnes]
4 axle lorries	[Rigid to 32 or Articulated to 38 tonnes]
Vehicle and draw-bar trailer	[4 axles to 36 tonnes]
Vehicle and draw-bar trailer	[4 axles to 36 tonnes]
5 axles or more articulated	[5 axles to 40 tonnes]
Vehicle and draw-bar trailer	[5 axles to 40 tonnes]
6 axles articulated	[6 axles to 41 tonnes]
Vehicle and draw-bar trailer	[6 axles to 41+ tonnes]
Larger lorries	[5 & 6 axles to 44+ tonnes]
AILS	Various, not necessarily loaded weight driven

**1.3 ‘Early Years’ B1122** – it was reassuring to have my previously expressed grave concerns regarding the use of the B1122 as an interim solution to SZC freight vehicle issues (in the absence of a suitable link road being available), confirmed by others. Not least of which was the testimony of Suffolk and Norfolk Police who confirmed the presence of several ‘pinch points’ that made the passage of two large vehicles in opposing directions hazardous.

**1.4 ‘Change in the project methodology being employed’** – Ms Williamson for the Applicant confirmed my suspicion that the Applicant, having failed to be able to confirm delivery of SZC to 2035 using a more traditional ‘waterfall’ project approach, has now embarked on transitioning to a methodology more akin to the ‘Agile’ approach, used extensively in web, software and gaming developments and known better in some industries sectors as ‘time boxed roulette’).

I do not intend to comment on the merits of either approach, but would like to make the ExA aware that this seems to be underway and that they may wish to take independent advice on the potential risks of transitioning a project of this scale and complexity to an Agile style project environment.

Moreover, the ExA may wish to enquire of the Applicant when; they anticipate completing the transition and therefore, presumably being able to make available a re-cast, detailed project plan for the construction and commissioning elements of the proposed station.

**1.5 ‘To be or not to be...a haul road’** – Ms Williamson also mentioned the SLR and stated *“Well for us the first job that the SLR does, it acts as a haul road, so it allows us to take material out, not just from the SLR footprint but from the 2 Villages By-pass and Yoxford roundabout...”* This is something the Applicant has previously and stridently denied.

Moreover and in this connection Ms Williamson continued *“...this mass balance, the spoil removed to the main development site, is the equivalent of 70,000 vehicle movements. So, the fact we can use that haul road, then take advantage of that site is actually in our view of life, beneficial.”*

As far as I am aware, this activity and/or haul road is not specified in the Applicants documentation, although I do admit I have not been able to navigate and read the huge volume of material produced by the Applicant as deftly as I would have hoped. I put that down to; age, human frailty and time!!

Subsequent to that section of the hearing, Mr Bull on behalf of the Applicant insinuated that I was being disingenuous by using the term “haul road”. Instead, I reminded him (through Mr Humphrey) that I was merely repeating the words selected by their agent.

**1.6 ‘A conspiracy of silence...’** – However, what this episode and the Applicants sensitivity about the use of the term “haul road” illustrates to me is that;

- a) the selection of the proposed SLR’s routing was convenient, in that it enabled the:
- b) facilitation of an interim “haul road” and in so doing also enabled the Applicant to;
- c) gain beneficial access to a secure, significant and very local source of seemingly suitable ‘backfill’ materials...
- d) at little additional cost...
- e) so long as it isn’t subsequently required to reinstate the land (taken by the SLR) to agricultural use...
- f) perhaps also explaining the Applicants reluctance to countenance removal and reinstatement after construction...
- g) and their rather bizarre insistence that the SLR is a plausible ‘legacy asset’ of significant value to residents!

With the foregoing in mind, I would ask the ExA to investigate further the selection of the SLR and the potential cost benefit of the described scenario to the Applicant. Thereby identifying the potential means, method, opportunity and motive!

**1.7 ‘Construction Worker Travel Plan’** – In commenting on Main Development Site parking Mr Rhodes referenced *“...limited parking that is strictly defined.”*

Regrettably, I cannot reconcile this with the figures laid out in “Schedule 1 Authorised Development” and detailed in my previously submitted Written Representation No. 3 and summarised below:

#### **Schedule 1 (Part 1)**

Work No. 1a (items r,x & z) totalling 2,970 permanent, temporary and P&R parking spaces

Work No. 1d (items gg and hh) totalling 688 operational and an unquantified number of Outage parking spaces

Work No. 3 (items b, c(ii) and iii) totalling 1,300 plus 60 Blue Badge parking spaces

## Schedule 2 (Part 2)

“Other Associated Development...and in connection with Work No. 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16 and 17”

(iii) – temporary vehicle parking (unquantified/unlimited)

(f) – Vehicle and bicycle parking areas (unquantified/unlimited)

(i) – parking areas (unquantified/unlimited)

I would ask the ExA to explore with the Applicant the seeming contradiction between the verbal and written word.

**1.8 ‘Community Forum’** – I would like the ExA to be aware that the independently Chaired EDF Community Forum has not met since 2019, nor has the Applicant made any concerted effort to continue dialogue in a structured way across the Parishes constituting East Suffolk, nor for that matter those adjacent and adjoining; Leiston, Theberton, Yoxford, Middleton-cum-Fordley, etc.

I do understand that in recent months, the Applicant has sought relatively short notice meetings with some Parish Councils, largely where they (the Applicant) are seeking to be perceived as progressing issues likely to arise during the course of the Examination.

**1.9 ‘Traffic Incident Management Plan’** – I would like to add my support to the comments and observations made by SCC, ESC and HE in respect to the context in which the TIMP will exist.

As identified by others, there is limited Incident Management capability within the Applicants proposal, as indeed there is little or no ‘HGV hold’ capacity on the A12, particularly north of Yoxford through to Lowestoft, but also to the south and indeed in both directions of the A14 beyond the proposed FMC at Seven Hills.

As was touched on during the Hearing, I would agree that significant ‘scenario planning’ must be jointly undertaken way ahead of work commencing. In my experience, to be useful this will involve significant resources from all agencies and will also require significant preparatory work by a team of people familiar with the locality, the environment, the disposition of local agencies and a full understanding of the inter-agency protocols.

I would ask the ExA to ensure that there is an undertaking from all involved parties to initiate this preparatory work at the earliest opportunity, recognising of course that operational pressures may mean public services are unable to commit until such time as there is confirmation of the project. I would also suggest that items considered at 1.2 above might be included in such preparatory work.

I do welcome the unequivocal confirmation of the Applicant that; they do not plan to use the proposed Theberton Bypass for the lay-up of vehicles in the event of an incident precluding access or egress from the Main Development area.

However, I urge the ExA to seek a resolution from the Applicant for the northern section of the A12 which seems totally unconsidered despite *‘1 in 6 (16.7%) of HGV movements will use this route’*, plus of course AIL movements!



**1.10 'Fordley Road and SLR Junction'** – As I explained at the Hearing, the current proposed junction poses an existential threat to residents of Fordley Road, North Green, Kelsale-cum-Carlton, East Green, Lowes Hill, Butchers Road, Tiggins Lane, numerous Red List Species, at least 3 Nature Reserves, Heritage Assets as well as a Conservation Area.

I do not propose to duplicate the submissions of Kelsale-cum-Carlton Parish Council in Pre-Planning Consultations and to the ExA itself, except to say;

I implore the ExA to direct the Applicant to bring forward proposals that offer all communities impacted by this serious shortcoming in the design (of the proposed SLR), protection from the worst excesses of motorists trapped on the A12 and/or the proposed SLR.

**1.11 Fordley Road and 'Suffolk Quiet Lanes'** – Pictures (P1 & P2) demonstrate the in direct impact of a remote accident on the A12 on Fordley Road, a narrow, high sided country lane and part of a network of Quiet Lanes, designated by Suffolk County Council linking and passing through the Parishes of Middleton-cum-Fordley, Kelsale-cum-Carlton and Theberton. Picture (P3) demonstrates what happens to narrow lanes when EDF surveying is being undertaken!

P1



P2



P3





**1.12 Fordley Road on normal days** – Pictures (P4, P5, P6) demonstrating that even on ‘normal’ days the route can throw up everyday vehicles that can be a trial for the unwary or inexperienced driver!

Agricultural vehicles also present regular challenges; tractors, cultivators, hedge trimmers, sprayers and nitrate spreaders, etc.

During harvest, the LGV is more likely to be a tractor and grain trailer combo, whilst the waste lorry could easily be a combine harvester or a large grain lorry collecting from the store.

