

## **Additional Representation on behalf of**

### **Theberton and Eastbridge Parish Council, Stop Sizewell C and B1122 Group**

At the Issue Specific Hearing on Transport, in particular ISH 2 session 3, Ms. Williamson, for the Applicant, talked about the role of the Sizewell Link Road (SLR) in its early years to provide a haul road route for transporting backfill material from the Two Villages Bypass, Yoxford Roundabout and SLR to the Main Development Site (MDS).

It was also stated that the reason the SLR could not be started earlier in the construction process was that the MDS had to be established at a level where the backfill materials could be accepted. We wish to make it clear to the Planning Inspectorate that none of this information had previously been shared with local communities, despite intensive discussions about the route and purpose of the SLR ever since EDF first proposed it.

We think it is appropriate that the history of the Applicant's statements on the requirement for a relief road as opposed to the use of the A12 and Heavy Route 100 (along the existing B1122) as the main HGV and Park & Ride Bus access route to Sizewell C is reviewed alongside the motivations for acceding to the inclusion of a relief road and the selection of the SLR as opposed to any of the other routes "assessed" during for the third consultation.

#### **Consultation 2**

- The maximum number of HGVs envisioned (Table 6.2) was 900 movements (450 deliveries) with an average at peak construction of 450 movements (225 deliveries).
- The assessments of traffic on the B1122 at Theberton and at Leiston, Abbey Road/B1122 junction showed that this was potentially the most heavily impacted with a 46% increase shown in Table 6.6.
- Also, section 6.7.20. states
  - "At B1122 Abbey Road in Leiston, flows increase significantly from a low existing level and the road capacity would not be exceeded."
    - This assumed that the green rail route would not be used and all rail traffic would be routing to the Land East of Eastlands Industrial Estate (LEEIE).
  - The flow predicted at peak would be 7,600 per day at peak, exactly the same as at the centre of Theberton where the increase is slightly less at 37% and therefore the capacity of the B1122 at that point would also not be exceeded.
- At this point in time EDF were clear that they believed a relief road to the site to avoid traffic impacts on the B1122 was unnecessary.

#### **Consultation 3 – Volume 1 Development Proposals**

- In the road-led strategy the maximum number of HGVs envisioned was 1500 movements (750 deliveries) with an average at peak construction of 750 movements (375 deliveries).

- Also, section 6.4.22. states
  - In some locations, such as B1122 Abbey Road in central Leiston (location B) and B1069 Coldfair Green (location D), the relative increase in bus flows is substantial but this is from a low base level, and would not cause the road capacity to be exceeded.
- and section 6.4.30. states
  - At B1122 Abbey Road in Leiston, flows increase significantly from a low existing level but the road capacity would not be exceeded.
- On SLR earthworks section 10.7.7. states
  - The proposed route would require both cut and fill earthworks (cuttings and embankments) to deal with existing ground levels. Based on the current design, circa 45,000 cubic metres of additional fill material would need to be brought to the site.
- Table 6.15 states that the increase in HGV and bus traffic through Theberton will increase by 273% at peak hour.
- The Scottish Power development, if approved, would also increase HGV traffic by approximately 47%.
- In combination these increases represent a major adverse impact on the B1122 at Theberton.

#### **Consultation 4 – Volume 1 Development Proposals**

- On changes to the SLR section 6.3.11 states
  - We are also proposing to put the main alignment around Theberton **in a deeper cutting** to enable Pretty Road to bridge over the Sizewell link road.
- Section 6.3.20 states
  - Whilst it was our intention, as expressed at Stage 3, to retain the Sizewell link road post-construction, in response to feedback received at Stage 3 we are open to an alternative approach to remove all or part of the road.

#### **Application Description of Sizewell Link Road [REP5-058](#)**

- Section 2.4.33 states
  - Earthworks would be designed to maximise cut and fill balance in order to prevent material being sent off-site.....
- Section 2.4.35 states
  - It is estimated that 98,460 tonnes of construction waste would be created.

#### **Application Description of Two Villages Bypass [REP5-060](#)**

- Section 2.4.30 states
  - Earthworks would be designed to maximise cut and fill balance in order to prevent material being sent off-site.....
- Section 2.4.32 states

- It is estimated that approximately 49,500 tonnes of construction waste would be created through the construction of the proposed development. The proposed route would require both cut and fill earthworks to deal with existing ground levels

## Analysis

There are several worrying aspects to the statements and sequence of changes that have travelled with this project from the earliest consultations through to the latest Applicant submissions regarding the need for a direct route to the MDS from the A12 which avoids the unsuitable B1122 with its problematic junction with the A12 at Yoxford, the fact that it passes through Middleton Moor with narrow double bends and through Theberton with Pretty Road blind bend, multiple residences very close to the road and St Peter's Church with listed status, to name but a few.

We have now arrived at an application for Sizewell Link Road that offers no appreciable legacy compared to that which a more southerly route similar to D2 or W North would provide.

- Analysis by EDF in the early consultations was that the B1122 was nowhere near capacity even with the worst assumptions for road-based traffic and thus the idea that a "Relief Road" was necessary was simply unsustainable. We also had many discussions that implied that NSIPs were not "allowed" to leave a legacy and indeed several parliamentary questions and answers dealt with this very point. This despite the 273% increase in HGV and bus traffic referred to in Consultation 3 Table 6.15 above.
- As jetties came and went, rail delivery remained problematic, AECOM reports commissioned and references back to the original D2 proposal for Sizewell B were exercised and whilst capacity on the B1122 remained stubbornly un-exceeded, the Applicant acceded to the need for a Relief Road and looked at WS, WN (both similar to D2), X, Y and Z (SLR) as potential routes. The Applicant chose route Z, now known as the SLR whilst also toying with two smaller bypasses of Middleton Moor and Theberton and a hybrid rail and road scheme.
- It is notable in consultation 3 that the need for "45,000 cubic metres of additional fill material" for the SLR was quoted yet we now find ourselves with a design for the SLR that yields an excess of 90,460 tonnes that are required at the MDS as backfill. Also, the 273% increase in HGV and bus traffic referred to in Consultation 3 Table 6.15 above it is clear that impacts along the B1122 at Theberton and other B1122 locations are adverse.
- Questions asked at the Accompanied Site Visit of the Applicant's development team on why there are so many cuttings in the SLR design remain unanswered and indeed at a recent meeting between Theberton and Eastbridge Parish Council with the Applicant, the same question was asked again, and we still have no answer.
- Perhaps another reflection and reason why route W North was not chosen is the fact that there is basically no significant opportunity to create cuttings - and backfill - as once the route proceeds west from the A12, it has to cross the railway line, drop height to cross the B1121 and Fromus valley before rising onto the eastern side of the Fromus valley and then proceed "**at grade**" all the way to a connection to the B1122 and site roundabout. The Leiston spur railway can easily be crossed with a level crossing given

the low frequency of train movements along that line for the duration of the project. As we have already discussed, this route for 85% of the HGV traffic is shorter, more sustainable, it relieves the B1122, Middleton Moor and Theberton of 85% of the HGV traffic and all southern Park & Ride buses and leaves a much better legacy for Leiston, Sizewell A, B and C as well as the off-shore windfarm on-shore installations.

### Concerns for the Early Years

Starting at Consultation 3, the impacts of traffic on the B1122 have been increasing, especially for the Early Years. In the ES 6.3 Volume 10 on Transport ([APP-198](#)) Table 10.15 for link 10 in Theberton shows a 278% increase in HDVs and major adverse amenity effect and Table 10.16 a 440% increase in HDVs and major adverse effect for the representative hour of 07:00 to 08:00. Having said that, the Applicant's assessment states there is no adverse effect on severance, fear and intimidation, or driver passenger delay or accidents and road safety. Such clearly contradictory assessments cannot be taken as credible.

The selection of monitoring point 10 is to the south of Theberton village and the sensitivity assessment at that point is given as medium ([APP-199](#) Table 1.1) even considering that, within the village itself, footpaths are not overly wide, houses to the east are very close to the B1122 carriageway and part of the eastern side has no footpath.

In terms of the Early Years construction traffic, we have failed over the years to get a consistent answer to the question of how much traffic will use the B1122 and of what type and why the Relief Road cannot be built prior to work on the main site is started, thus providing the mitigation prior to the impact rather than after the impact. Whilst this might well be due to the fluid nature of the Applicant's plans, it has taken until these Issue Specific Hearings to unearth the some of rationale now prevailing for both the SLR and why it will not be provided prior to the Early Years, when HGV traffic is at its worst.

Presumably the 147,960 tonnes of construction waste from these two off-site developments are mainly soils and subsoils and is the total that the developer's contractors have not been able to avoid being sent off-site.

Perhaps the Applicant doesn't consider transfer to the MDS as being off-site?

As Ms Williamson, for the Applicant states in session 3 of ISH2 "*the SLR will be used prior to completion as a haul route for excavated materials from the SLR, Yoxford roundabout and the Two Villages Bypass, which will save in total 70,000 vehicle movements.*"

Perhaps there is an error in terms here. Assuming an average of a 25-tonne load per HGV (50% 20 tonne 8 wheeled tipper and 50% 30 tonne articulated tipper) then 59,184 two way trips will be required to move this material to the spoil/resource heaps on the Main Development Site. So, assuming the additional 10,816 two-way movements are for the Yoxford Roundabout (seems too large) then the 70,000 **two-way trips** are accounted for but **NOT** "saved".

That means that about 34,000 two-way HGV trips will occur for the Yoxford Roundabout and Two Village Bypass and will almost certainly have to use the B1122. It is likely that some proportion of SLR's 36,000 two-way trips will also find themselves on the B1122.

It is highly unlikely given the developments of bridges, cuttings and embankments that any material other than that from the SLR itself will be able to use the under construction SLR as a haul road. Also given the fact that it is the Applicant's intention to develop the SLR from the A12 towards the B1122, it brings into question how many of the ~59,000 HGV two way trips will actually be possible on an incomplete SLR haul road.

For those SLR HGVs that use the unfinished SLR as a haul road they will presumably be joining the B1122 at some point south of Theberton village to complete their journey to the MDS. We have seen no description of how that will be achieved nor what sort of precautions for cleaning wheels prior to joining the B1122 or how any such junction will be implemented and controlled. The impacts on existing B1122 and new Sizewell C traffic will be considerable.

We must seek assurances that the types of large earth moving vehicles for grading and creating cuttings and embankments on the SLR will not be allowed to travel on the final stretch of the B1122 to the MDS as the road is not suitable for such vehicles no matter how short the journey. Should there be an intention to use such vehicles to transport backfill directly to the MDS, further information needs to be provided about how such vehicles propose to reach the MDS from the end of the SLR "haul road" as in general they are not licensed for use on public roads.

To repeat what was submitted as part of the summary of our oral submission at ISH 2, reference was made to the [AS-280](#) Freight Management Strategy, Plate 4.2 but that doesn't really answer any of these questions about what types of vehicles are coming from which Associated Development site, in what volumes, at what times in the development schedule, and which route combinations will they be using.

For those vehicles which exit the SLR haul road onto the B1122 for the short journey to the MDS, are they even counted anywhere in these Early Years?

## **Conclusion**

On reflection, what justification is there for an application choosing a location and then arriving at two designs for the SLR and Two Villages Bypass which have now become thinly disguised quarries for backfill material? Even this situation seems to have surprised the Applicant as previously they thought they needed to bring in 45,000 tonnes of backfill for the SLR and they would still have been short of backfill for the main site in excess of over 90,000 tonnes that is now coming from the SLR excavations.

We are pleased that the ExA has recognised the sustainability issues surrounding the choice of route for the SLR at the end of ISH 2 Session 3. It sits alongside the fact that as legacy it has little to recommend itself being a road parallel to the existing B1122, as referenced by the Highways Authority at Suffolk County Council.

Since the start of consultations with the Applicant almost 10 years ago, we have repeatedly asked for more information and justifications for their proposals and choices. We have been serially disappointed at each consultation and we are still asking for details and justifications and coming up short.

Given the farago above on backfill material, it is clear that the HGV numbers in the Early Years have been under-estimated and not properly reported, leaving us as consultees in the dark on the true impact of this development and even now it is hard to believe that the real impacts are being communicated by the Applicant. This is a situation which has to come to an end and we need a properly evidenced transport plan, especially in the Early Years, as the potential for adverse effects on air quality, noise, vibration, severance, etc. from the Two villages bypass all the way up the A12 and along the B1122 needs to be fully and honestly communicated.

As another consequence, the design and planned construction of the SLR now being described by the Applicant calls into question the aspiration of Suffolk County Council and our Member of Parliament - and EDF's questions at Stage 4 - to have the SLR removed post development. In order to achieve such an objective 90,460 tonnes of missing material would have to be sourced from somewhere to "fill in the holes".