

DEVELOPMENT CONSENT ORDER EN010012 : THE SIZEWELL C PROJECT

Sylvia Ballard

29 September 2021

ADDITIONAL SUBMISSION RE: ISSUE SPECIFIC HEARING 12 – SESSION 3 Section 4 ii re: BRIDLEWAY 19 LEISTON CUM SIZEWELL

WRITTEN RESPONSE TO THE FOLLOWING EXAMINATION LIBRARY REFERENCES:

[REP8-023](#) NNB Generation Company (SZC) Limited - 2.5(D) Main Development Site Highway Plans for Approval

[REP8-055](#) NNB Generation Company (SZC) Limited - 6.3 Volume 2 Main Development Site Chapter 15 Amenity and Recreation Appendix 15I of the Environmental Statement: Rights of Way and Access Strategy

[REP8-122](#) NNB Generation Company (SZC) Limited - 9.101 Written Summaries of Oral Submissions made at Issue Specific Hearing 12: Community (15 September 2021)- Revision 1.0

[REP8-126](#) The Sizewell C Project - 9.105 Revision: Written Submissions Responding to Actions Arising from Issue Specific Hearing 12: Community (15 September 2021)

[REP8-183](#) Suffolk County Council - Post Hearing submissions including written submissions of oral case - Issue Specific Hearing 12 (15 September 2021) – (ISH12) Community

To the Examination Authority

I have previously raised my concerns about **Bridleway 19 Leiston cum Sizewell (BR19)** in my submissions [AS 333](#) , [REP7-265](#) and [REP8-271](#) that as a material issue the provision of a safe and certificated alternative north-south connectivity route that is suitable for horse riders, cyclists and pedestrians as a temporary diversion of well used **BR19** cannot be achieved before the commencement of any of the construction works, as required by **Development Consent Order EN010012-002875 SZC**.

As with any planning application that seeks *permission* for a development that affects a highway (including public rights of way) of any status, the *rights* of the users

of that highway must be protected. A new temporary highway must be provided, which has been completed and is open for use by the public to the reasonable satisfaction of the Highway Authority. In the case of **Development Consent Order EN010012-002875 SZC** the Highway Authority is Suffolk County Council.

'It would not be acceptable for the DCO to be granted where changes to the highway network could not be implemented in the intended manner or which did not secure the integrity of the highway network for users.' [REP8-183 SCC](#)

The difficulty with the **DCO EN010012-002875 SZC** is that there are many discrepancies between the large number of submitted application documents. Plans that show one set of information such as the proposed changes to the lesser highways of Footpaths and Bridleways, do not correspond to plans showing proposed changes to vehicular highways and the extent of proposed development.

The following clip from [REP8-023](#) Main Development Site Highway Plans for Approval Sheet 6 shows the proposed secondary access road to the main development site for use during the construction period. The estimated time for the construction period is 10+ years.

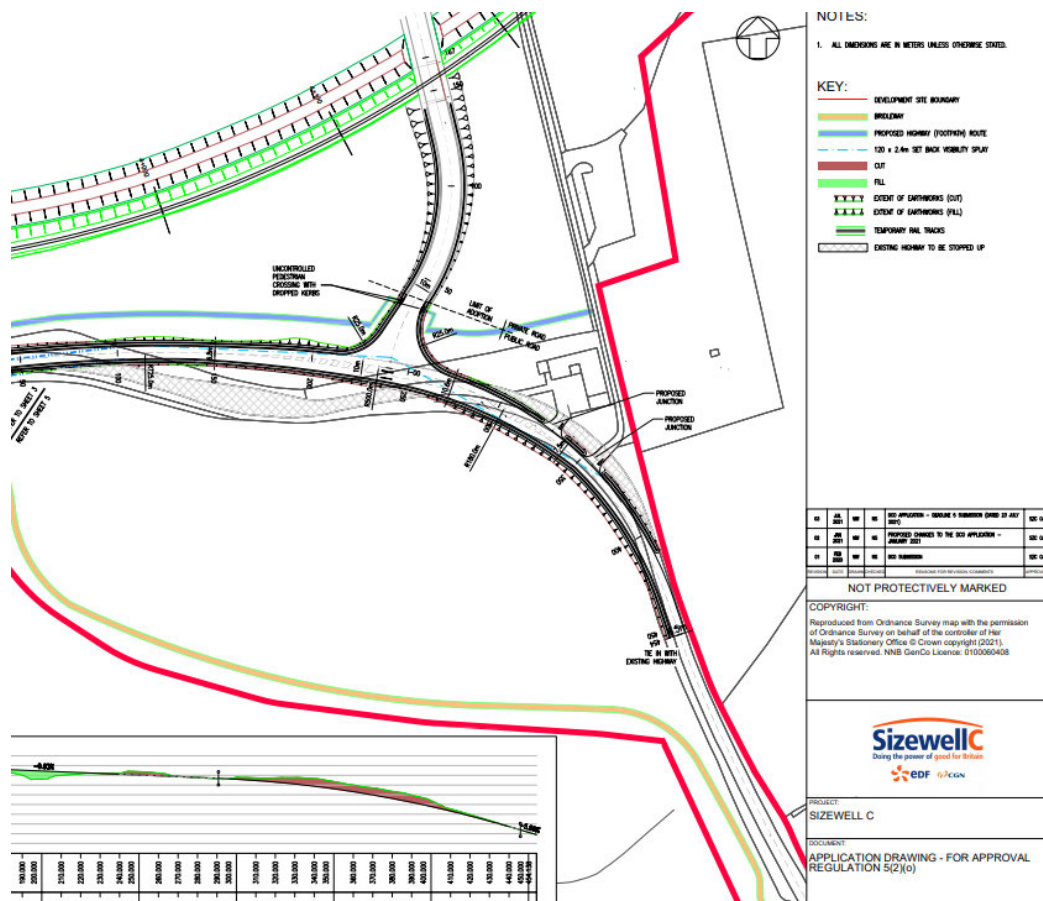


Diagram 1

The entrance from the vehicular highway to the secondary access road within the main construction site is shown in bold black. The proposed construction site access road crosses the line of the proposed development site railway shown embanked in green. The legend refers to a brideway shown in orange to the south of the proposed secondary main construction site access road. This is not the current definitive alignment of **BR19**.

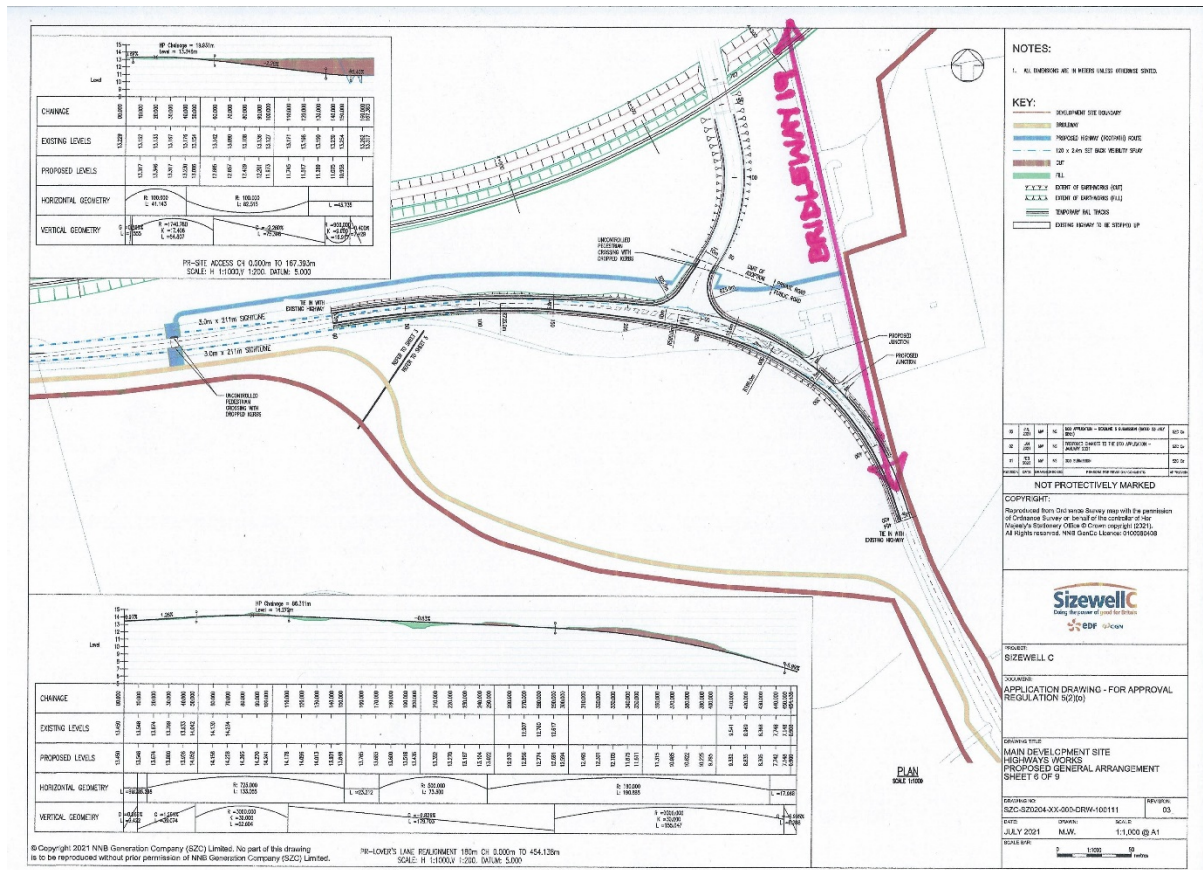


Diagram 2

What is missing from the plan on Sheet 6 of [REP8-023](#) is the definitive alignment of **BR19**, which I have added shown in pink on Diagram 2. Without local knowledge or the indication of the definitive alignment of **BR19**, it would be easy to assume that the construction of the access to the main construction site from the vehicular highway, and the construction and use of the internal access roadways and the construction and use of the proposed railway did not affect **BR19** or jeopardise the use of that right of way by the public.

Below is an enlarged clip from Figure 15I.2 of the Main Development Site Environmental Statement: Rights of Way and Access Strategy ([REP8 055](#))

BR19 is shown as a pale blue line and the legend notes: route closed during construction.

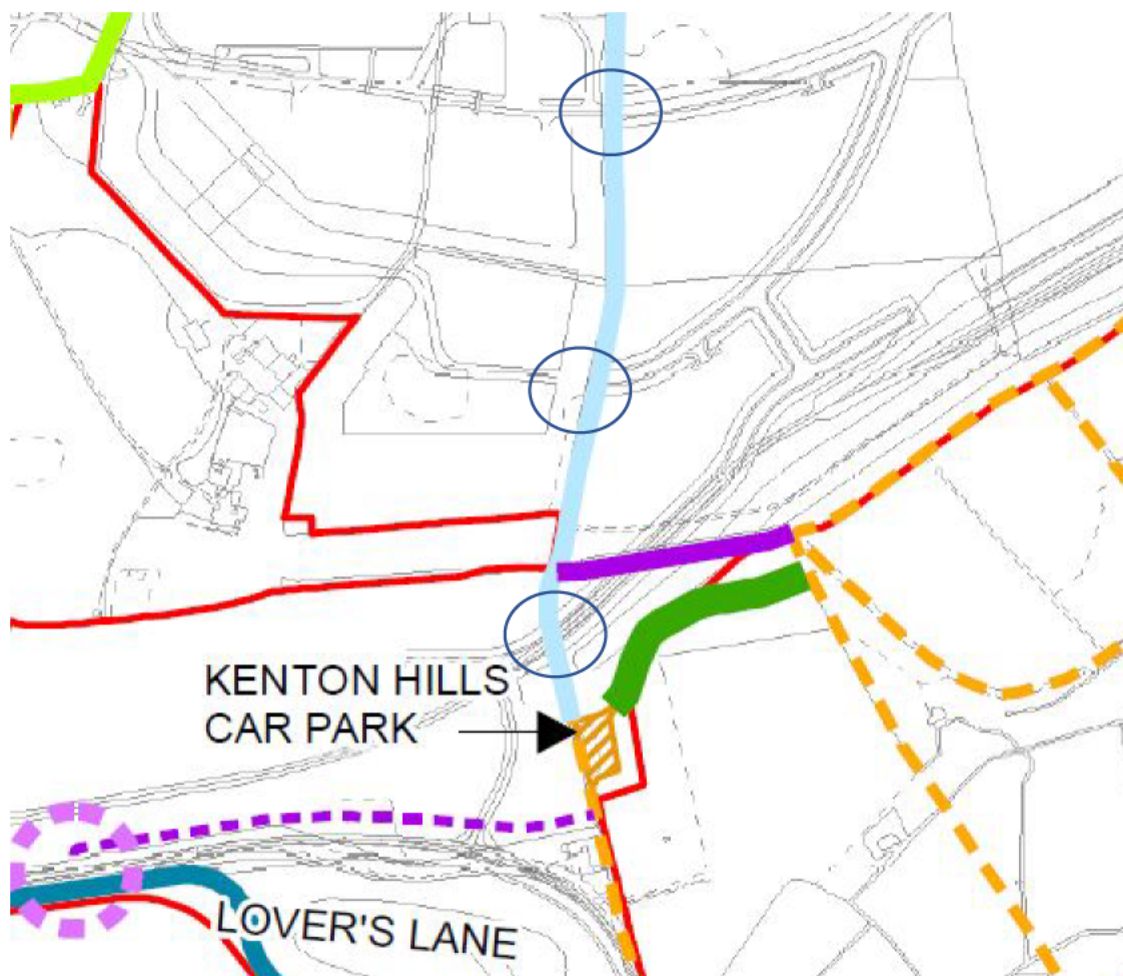


Diagram 3

Without local knowledge it is not clear to anyone viewing this rights of way plan that the grey detail of the background mapping is the proposed location of the secondary access to the main construction site from the vehicular highway yet to be authorised as shown in [REP8-023](#). **BR19** is compromised in at least three locations, as ringed in blue, by the internal access roadways and the proposed construction site railway of the proposed development site.

At ISH12 Mr Brashaw for SZC confirmed that SZC Co. is proposing a new safe off-road route and that there is a commitment through the drafting of the DCO that the **BR19** diversion will be in place before the existing route is temporarily stopped up. (see [REP8-122](#) section 1.4.9)

In [REP8-126](#) (section 1.9.1) SZC Co is now committing to continuity of **BR19** on its current definitive alignment during the early years of the development until such time as the diversion on a new permanent off-road bridleway around the construction site is completed.

As can be seen from Diagrams 1, 2 and 3 above, **BR19** will be immediately compromised by the proposed works within the main construction site. It is totally unacceptable that horse riders, cyclists and pedestrians should be expected to use this route at any time during the proposed construction period. There will be

movements across the definitive alignment of heavy construction vehicles, ground workers and associated plant and machinery. There will be safety barriers, flashing lights, and a high volume of noise. This construction location will not be a suitable and safe thoroughfare for members of the public.

The proposed alternative route for **BR19**, which will be created during the construction of the Sizewell C Link Road roundabout on the B1122, will also be subject to the same problems, as described in my previous submission [REP8-271](#) and is an unsuitable alternative route for **BR19** during the construction of the roundabout estimated to be a minimum of 2 years.

The 24/7 availability of a definitive public right of way through the centre of the main construction site will also pose a security risk to the proposed SZC development.

The issues regarding the location and use of **BR19** have clearly been foreseen by the Applicant, and much attention has been drawn to the aspirational 'new' and 'improved' access for non-motorised users via the north south combined bridleway, cycleway and footpath. The inability to meet the terms of Development Consent Order EN010012-002875 SZC to deliver a safe alternative route before the temporary diversion of **BR19** should not be seen as 'reasonable endeavours' having been made.

It is simply a question of geography. There is no immediately available alternative route for **BR19** either east or west of the proposed development site.

CONCLUSION: As a material issue the provision of a safe and certificated alternative north-south connectivity route that is suitable for horse riders, cyclists and pedestrians as a temporary diversion of well used **Bridleway 19 Leiston cum Sizewell** cannot be achieved before the commencement of any of the construction works, as required by **Development Consent Order EN010012-002875 SZC**.

Thank you for considering this written submission.

Sylvia Ballard