

WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)



TRANSPORT & TRAFFIC

Interested Party: SASES **PINS Refs:** 20024106 & 20024110

Date: 24 October 2020

Issue: 5

INTRODUCTION

1. This representation addresses issues surrounding the perceived impact of the increase in traffic flow in the vicinity of Friston as brought about by the declared intention of Scottish Power Renewables (the Applicant) to site two substations at Friston plus a new National Grid connection hub at Friston. It does not address specifically issues that arise from that part of the proposed development in proximity to the cable landfall site or the cable construction corridor Section 4. These are addressed in the written representation in respect of the [cable corridor].

2. In compiling this representation full use is made of the Applicant's document: primarily Chapter 26 - Traffic and Transport refers. [*vide* APP-074]

3. This representation is set out in four sections.

- **Section One:** Construction Traffic Impact: A12 and A1094
- **Section Two:** Impact of construction traffic in and around Friston
- **Section Three:** Pre-Construction Road Friston
- **Section Four:** Permanent Access Road 13

SUMMARY

4. The onshore activity necessary for the construction and later operational use of EA1(N), and EA2 and the National Grid connection hub will depend almost exclusively of use of the public road network in and around Friston. There is only one A class road in the immediate area, the A1094, which provides a direct link between the nearest trunk road (A 12) and Aldeburgh. All other roads are either B class roads, minor roads and by-ways, many being single track with passing places serving villages and farms. In the summer months the traffic numbers are swelled by tourists.

5. The build plus the associated cable connections to the coast will require extensive earth movement by tracked plant and tipper type trucks plus deliveries brought in by heavy goods vehicles. There will be need for a large number of ancillary vehicles including workers' transport and hospitality vehicles, excavation and cable ducting works, delivery of electrical apparatus such as transformers and switch gear plus permanent roadways for access and maintenance. The proposed development(s) may last between approximately 4 and 7 years and the operational life of the substation(s) perhaps 30 years or more. The duration of the decommissioning process has not been disclosed by the Applicant.

6. The reality of any increase in road traffic in a rural area is an increased concern by local residents regarding:

- Noise, dust and pollutants
- Congestion on narrow roads and junctions
- Perceived danger to cyclists, horse riders and pedestrians in the absence of refuges such as pavements
- Loss of amenity to cyclists and walkers
- Perceived Increased collision risk brought about by proximity of HGVs reducing the visual field of other road users
- Fear and intimidation experienced by local residents when confronted by HGVs moving on narrow roads.

A12 and A1094

7. The A12 to A1094 junction known as Friday Street is an accident black spot. The Applicant assesses that before mitigation the impact of the proposed increase in traffic is **“major adverse”**. The analysis and information provided in respect of mitigating this impact are inadequate as are the proposed mitigation measures together with the monitoring of those measures – see further paragraphs of Section 1 below.

8. Beyond Friday Street the A1094 is narrow and twisting with occasional inclines. The Applicant does not appear to have carried out an analysis to determine if/how construction traffic, particularly HGV's can readily pass each other on the road without adverse effect upon other road users. The Applicant needs to demonstrate that the largest vehicles proposed (other than AILs) can navigate these routes without causing increased congestion – see further paragraphs of section one below.

9. The junction of the a 1094/B1069/unnamed road, known as the Snape Crossroads, is another accident cluster and also suffers serious congestion not least because it is the main access to the cultural and retail destination of Snape Maltings. This junction will also become further congested as a result of traffic seeking to avoid the congestion on the A12. The Applicant has not analysed the increased congestion, the impact or proposed any mitigation measures.

10. Beyond Snape Crossroads to the B1121 and B1069 junctions the A1094 is used by cyclists as it forms part of the Sandlings way and part of a designated national cycle path. There is no refuge in the form of pavements or laybys. Increased traffic particularly HGV raises concerns with regard to safety and congestion which have not been analysed.

Friston Specific Issues

11. Within Traffic and Transport Chapter 26 [APP-074] there is little clarity regarding the purpose of access points 12/13 in particular the Applicant fails to show the impact that these access points or the associated works will have on the community of Friston. (Sections 3 and 4 of this document). In particular:

- The flow and designation of all traffic is missing.
- The monitoring of disturbance on the residents of Friston is missing.
- Mitigation for the safe use of the roads by pedestrians, cyclists and vehicles is missing.

12. Traffic flows per day are summarised in Tables 26.19 (HGV's) and 26.20(Construction Workers) Chapter 26 Traffic and Transport (APP-074) These tables are confusing and it is unclear to the reader how any vehicle movements are proposed.

13. The tables focus on the peak flows per month and the "missing" months are presumed to be lower, however it is not clear and the Applicant should clarify this point.

14. Further detail of the flows exist in Appendix 26.14 /15 and 26.23. (APP 540) Whilst Table 26.19 of Chapter 26 (Traffic and Transport) match the figures contained in 26.14 for HGV's the figures in 26.21 (Construction workers of Chapter 26 traffic and Transport do not match and are half that indicated in Appendix 26.15.

15. The Applicant must clarify the variation in these figures without which an understanding of the full impacts of the traffic volumes are unclear. The Applicant has failed to address these issues which are further highlighted in the following representation.

Conclusion

16. There are many questions which need answering including, without limitation, those below.

- How will the traffic movements on the A12/A1094 junction after completion of their proposed mitigation be monitored?
- How will the changes on commercial, domestic tourist traffic movement as a result of the mitigation measures at the A12/A1094 junction be monitored?
- How will the safe and efficient passage of all traffic on the A1094 be ensured?
- Will a full Transport strategy addressing the NPS EN-3 requirement for detailed consideration of use of water and rail links be produced?
- When will a full detailed document detailing maps, use, timescales of use, and preparation for accesses 13 and 12 (including traffic volume routed and designations) be produced?

17. There are a significant number of errors and omissions in the Applicant's assessment and many questions, which remain unanswered as set out in the text below. Accordingly the assessment does not comply with section 5.13 of EN-1.

SECTION ONE - CONSTRUCTION TRAFFIC ON A12 AND A1094

A12 to A1094 Junction (Friday Street)

18. The Applicant begins by stating the proposed increase in traffic to be assessed as a “**major adverse**” effect on the traffic conditions at the A12/A1094 junction Chapter 26 Traffic and Transport 26.6.1.10.2 Cluster 3 then goes on in 26.6.10.2 SPR cite further mitigation measures Paras 295-301. Within these paragraphs The Applicant places undue reliance on EDF and their future plans to alleviate the traffic issues for themselves.

19. The Applicant concludes in Para 301 (APP-074):

*“in summary for cluster 3 it is forecast that the PIER package of highway movements improvements augmented with measures to manage employee traffic movements during peak hours (as defined by the OTP) would result in a predicted magnitude effect of **negligible** on a high sensitive receptor with an assessed residual impact of **minor adverse**”*

20. What monitoring processes will the Applicant have in place to track the traffic conditions as a result of their mitigation measures?

21. In their Relevant Representation Suffolk County Council state their views regarding the Applicant’s approach to mitigation at this junction.(AoC-007) as follows:

*“**Traffic and Transport** - The Council considers that the proposals are inadequate in a number of ways including: the provisions for abnormal loads are insufficient, particularly for the future as AIL access for maintenance and decommissioning are not assessed in either the ES or Transport Assessment (TA) beyond local widening of the B1069/A1094 junction; the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate in the Local Highway Authority’s professional opinion to avoid an increase in accidents and that alternative mitigation is required to do so including potentially a roundabout; no provision has been made to enter into a planning obligation with the Local Highway Authority to cover the cost of necessary highways works, for example permanent changes to the A12 speed limit at Benhall; the cumulative impact of this project and other future energy projects has not been assessed in transport terms, this specifically impacts the Stratford St Andrew Air Quality management Area (AQMA); the operational, maintenance and decommissioning activities of EA1(N), EA2 have been scoped out of the ES and TA; that limits of traffic movements have not been included in the outline Construction Transport Management Plan to limit the transport impacts to those assessed in the ES and TA; “*

22. Whilst a roundabout may improve safety it will increase congestion. Accordingly if this form of mitigation is agreed, the Applicant should make proposals as to how it intends to monitor and deal with the impact caused by roundabouts. In particular:

- The potential for further congestion at an already busy junction
- The slower acceleration and deceleration of larger vehicles i.e. HGVs
- The timescale for any works associated with the construction of a roundabout
- Diversion of traffic during its construction and the associated impact on by roads as alternative routes
- Loss of income for retail outlets due road closures

23. The build of EA1(N) and EA2 substations plus the NG connection hub is clearly a roads based development, and it is inferred, from Traffic and Transport Ch.26 **Ref 1** that the primary route into and out of the designated development area will be via the A12, with a significant part of transport load entering and leaving via the A12 - A1094 junction (Friday Street). At this point it should be noted that a new road running between the A12 and the site of the proposed Sizewell C Nuclear Power Station is envisaged, but as yet congruence with the Applicant's proposals is unclear.

24. Regarding the current state of the A12, Highways East of England Route Strategy, published in 2017 states: **Ref 2**

“the region is highly dependent on the A12, as it is the only major access North and South for communities and freight companies to Lowestoft and Great Yarmouth”“congestion on the A12 is a potential barrier for Economic prosperity”.....

25. That section of the A12 between Ipswich and Great Yarmouth has not received any funding for road improvements following this review and the section remains less than adequate for current vehicle movement. It is recognised that it needs upgrading, however the next round of reviews is not due to start until 2020-2025. This would indicate strongly that the Applicant would be ill advised to assume an upgrade to this route will provide mitigation for the increased traffic associated with construction.

26. The Applicant should therefore make clear how it intends to mitigate any disruption to the supply chain caused by accidents, delays and road works on the A12 and A1094 roads and provide assurance that vehicular traffic directly engaged in construction will not resort to using the B1121 and smaller by-roads.

27. Suffolk County Council (SCC) in conjunction with Highways England established designated HGV routes in East Suffolk for access to locations. The designation was established in 2011-2017 **Ref 3**. It should be noted that these designations were established to aid the safe passage of local traffic and vehicles serving local businesses and residential premises. There is no indication that they were ever produced to aid large scale onshore civil engineering programmes such as EA1(N) and EA2.

28. It is thus incumbent on the Applicant:

- To explain why a designation established in 2011-2015 to route vehicles on roads designed for local traffic only, and which have had no significant subsequent upgrades, can now be considered suitable for major volumes of construction traffic in 2023 involving HGVs.
- To explain why it now considers it acceptable to employ the largest size of HGV (typically earth/spoil removal types such as tipper trucks) on what are acknowledged to be narrow rural roads.
- To show that it has carried out surveys that confirm HGV vehicles of the type and dimensions it proposes to use, will be able to pass safely on A1094 and B1069. This is essential because all such movements are “two-way movements” and current local experience shows frequent mounting of verges are needed to facilitate passage. The route has recently been included for upgrading of the Suffolk Regional Cycling Plan. **Ref 4**

- To show clearly the size, tonnage and number of axles, speed limits for those HGVs to be employed in the construction programme (see Ch.26 p.32),(APP-074) such that local residents can understand risks posed at a personal level.

29. Regarding the junction of the A12 with the A1094 (cluster site 3), the Applicant cites that a proposal by Suffolk County Council exist to replace the junction entirely as part of the SEGway project. However, given this is not yet constructed and is outside the Applicant's control, the Applicant is proposing the following mitigation measures:

- A temporary reduction on posted speed limit in advance of the junction from 50mph to 40mph Southbound and Northbound
- Provision of enhanced warning signage to better highlight the junction to approaching drivers
- Provision of rumble strips and associated markings, to provide audible and visual warning of the hazard to approaching drivers

30. The above measures would appear to be a meaningful attempt by the Applicant to reduce the likelihood of accidents at this junction. Should this approach be deemed adequate mitigation, then a mechanism should be incorporated to monitor all accidents at the junction on a regular basis. Additionally, a contingency fund should be set aside for further safety measures should accidents increase a direct result of the project -centred traffic growth. The Outline Construction Traffic Travel Plan (APP-566), which outlines management measures to mitigate transport impacts, should be updated to reflect commitment to further improvement should they prove necessary.

31. EN-1 5.13 states...*"If additional transport infrastructure is proposed, Applicants should discuss with network providers the possibility of co-funding etc".....*

32. In line with current UK commitments regarding climate change and reduced motor vehicle pollution, the Applicant should have included within the EIA, descriptions of:

- How it intends to mitigate the increased level of noxious gases and particulates that will arise as a consequence of the increased traffic flow and increased transit delays at the A12 - A1094 junction (Friday Street).
- How it intends mitigate the effect of increased greenhouse gas emissions associated delays at this junction. "An evaluation of the impact of the Dublin Port tunnel and HGV Management Strategy" **Ref 5**

33. Clearly SCC, having responsibility for highways, identifies the A12/B1094 junction as a dangerous junction and that many minor changes having been made over the years to reduce accidents. The Applicant should explain why it considers that the application of rumble strips and signage would be sufficient mitigation to improve the situation and be adequate to cater for the increase in the number of vehicles, particularly HGVs, using this junction. If reducing speed limit on the southbound dual carriageway and adding rumble strips and/or more signage would reduce collisions, then these changes would have been installed already.

34. The Applicant highlights the A1094 as a "key link from A12 in the West to the town of Aldeburgh in the East" **Ref 6** The Applicant also states the A1094 to be a "rural road". As such the Applicant needs to justify:

- Why several years of added pollution and traffic delay at the junction with A12 and A1094 (Friday Street) should now be considered acceptable.
- Why it considers A1094 it as low magnitude in terms of safety and delay.
- Why it considers mitigation measures in the form of minor road realignment can improve the established fact the road is and will remain narrow and winding, and already servicing a high volume of tourist and local traffic. (Local experience confirms that repairing a single pothole can cause significant tailback of traffic on this road)

35. The Applicant should show:

- Why mitigation measures such as such as road realignments will not lead to 'rat runs', as local users seek to avoid delays so caused.
- How it intends to prevent delays in the existing efficient delivery of goods and services, access by emergency vehicles including health care provision, and prevent loss of visitor enjoyment.
- How it will address the needs of pedestrians and cyclists for whom the close passage of large numbers of HGVs is a daunting prospect.
- How it will create safe and secure layouts that will minimise conflicts between traffic and cyclists or pedestrians whilst avoiding street clutter.

A1094/B1069/Unnamed Road - Snape Crossroads

36. Table 26.14 Chapter 26 Traffic and Transport (APP-074) lists five junctions that currently are classified as accident clusters. Of the five junctions, only two are considered by the Applicant to have an "emerging pattern", and three have been excluded for further assessment because "no clear pattern can be found between each accident". The excluded junctions are:

- A1094.B1069 (Cluster 3)
- A1094/B1069/Un-named road Junction (Cluster 4)
- A12/B1122 Junction (Cluster 5)

37. The fact that these junctions are identified as clusters, with several accidents occurring at each over the past 5 years, should warrant further consideration by the Applicant. The fact no pattern can be found between the accidents is beside the point, these are accident clusters through which the Applicant SPR is proposing an increase of traffic, therefore mitigation should be considered to ensure as far as practicable accidents do not increase as a result of its traffic. Furthermore there is no linkage between each accident at each cluster listed above as several have the same causation factors.

38. Snape Crossroads is an important local junction providing access to Snape Village which in addition to residential property, includes a primary school, the Snape Maltings Concert Hall and Retail Outlet, being the shortest direct route from the A12. It should be noted that the Snape Maltings is a world renowned concert hall seating approximately 800 patrons all of whom arrive by vehicle. On the same site is a shopping complex with frequent events. The site also provides holiday accommodation. **Ref 7.** There is increasing use of this road as an alternative to the already busy A12. Accordingly the Snape Crossroads suffers from significant congestion

39. The Applicant should identify what mitigation measures will be provided to eliminate the likely adverse impact of increased vehicular flow on the A1094 on the social, cultural and commercial activities of this important venue. The Applicant should explain why it considers

that an increase of HGV/LCV/LGV traffic will have a minimal impact on the accessibility to and from this venue. **Ref 8**

A1094 to B1121 & B1069 junctions

40. This section of road is single carriageway, subject to a 60 mph speed limit (widely ignored) with hidden dips, culminating in a blind corner. It is much used by farm traffic and extensively used by cyclists as it forms part of the Sandlings way and part of a designated national cycle path. There is no refuge in the form of pavements or laybys.

41. There would appear to be no scope for mitigation methods, other than the Applicant providing procedural measures that will prevent the single track lane known as Mill Road being used as a shortcut to Friston by LGVs engaged in substation construction: signage currently indicates its unsuitability for HGVs.

SECTION 2 - IMPACT OF CONSTRUCTION TRAFFIC IN AN AROUND FRISTON

Designation of Vehicle Types

42. The DVLA makes clear that all Goods Vehicles are either Light Goods Vehicles (LGVs) or Heavy Goods Vehicles (HGVs). LGVs are identified as having no more than 2 axles, no rear side windows, and having a maximum gross weight of 3.5 tonnes. **Ref 10**. All other lorry type vehicles are categorised as HGVs, having between 2 and 6 axles, and have a maximum gross weight between 3.5 and 44 tonnes. It is acknowledged that AILs are a special case and will fall outside this restriction. **Ref 9**
43. The Applicant has produced an Outline Construction Traffic Management Plan (OCTMP) [APP-586] but this fails to make clear what constitutes 'Construction Traffic', in particular what constitutes construction HGV traffic and what is other construction traffic. Chapter 26 Traffic and Transport introduces the term LCV (see frontispieces Page 5, Page 9, Page 53), but provides no clear definition of where this vehicle type sits in the DVLA categorisation. **Ref 10 and Ref 11**
44. In all discussions with the Applicant, local residents have been assured that no HGV traffic will be allowed to traverse that section of the B1121 between the A12/B1121 junction at Benhall and the B1121/A1094 junction at Blackheath Corner. Discounting AILs, no such assurance has been given regarding all other forms of vehicular transport. **Ref 12**
45. At this point the Applicant has not yet shown any charts relating to the movement of LGV traffic (up to 3.5 tonnes). **Ref 13**
46. Tables 26.20/26/21 Traffic and Transport Ch 26 (APP-74) show the traffic movement for LCV and HGV only. There are no similar charts to indicate the number of Light Goods Vehicles, of which there will be many, associated with the development of this size.

Ancillary Traffic routes

47. In its limited appraisal of traffic in the area surrounding Friston, it appears that the Applicant fails to acknowledge that the village is bisected by the B1121. The Village Green, Children's play area, Village Hall, Church, allotments and Bowling Green are on the northern side, and the majority of the housing stock, Public House, Vehicle Repair garage and Baptist Chapel on the southern side. Any increase in road traffic on the B1121 as a consequence of substation build will have an adverse effect on village life. All other roads entering the village are essentially single track (e.g. lanes) with occasional passing places. These lanes are used by cyclists, horse riders and farm vehicles and with few passing places, vulnerable to congestion. To enable objective assessment of the level of disruption caused by construction traffic in and around Friston, the Applicant must identify what types of vehicle and likely numbers may be expected on the B1121, on links 5 & 7, Grove Road, Mill Road, Church Road and Church Lane.
48. The Applicant has made much of how it intends to monitor and route HGVs, but has failed to describe how this process will be extended to all other types of vehicles associated with a construction programme. Of particular concern is the number and natures of vehicles requiring access to the Pre-Construction Road (see following section) off Grove Road in Friston and at Access Point 13 (substation permanent access road on B 1121). This road

has also been referred to by the Applicant as an operational access road presumedly to distinguish it from being a construction access road.

49. The Applicant has indicated that a car share ratio of 1.5 workers/car has been assumed. It is not clear how this figure was arrived at or how it will be monitored, enforced or reported. A particular concern for residents in Friston and the immediate area, is the possibility of “Fly Parking”, where access to fields and passing places on narrow lanes is blocked by site workers.
50. The Applicant has stated that evening and weekend working may be required to maintain programme progress and for specific time critical activities. With the exception of Horizontal Drilling, no engineering tasks appear to need 24 hour working. Strict limits must therefore be imposed on the Applicant to prevent abuse of such an easement to the length of the working day just to “maintain programme progress”, which is a wholly commercial matter. As mitigation, abuse of the easement should therefore attract a significant financial penalty or withdrawal of weekend working permits. **In respect of working hours see written representation in relation to construction.**
51. Within Traffic and Transport, Chapter 26 (vide Tables 26.20 & 26.21), (APP-074) the Applicant has set out projected numbers of Construction Traffic vehicles to be associated over a 36 month period of construction. For further clarification of these figures, the reader is directed to appendices 26.14/26.23/26.15 [APP-540, APP-541 & APP549]. The format of these figures has proven difficult to follow and to develop a clear understanding of the situation.
52. The Applicant could improve matters by:
- Explaining why the matrices used in Chapter 26 are in different format to those use in the appendices?
 - Explaining why values are different in tables making it impossible to cross check numbers between the main document Chapter 26 and Appendices.
 - Explaining why it appears that some 20 months are omitted from the Traffic Tables 26.20/26/21
 - Explaining why there is no uniformity within the document regarding intervals i.e. days, weeks or months nor consistent format of tables.
 - Setting down clearly the number of vehicles, their type e.g. HGV, LGV (and any other designation adopted such as LCV) and their designated routes.
 - Explaining why LGV numbers are not included in any calculation of traffic numbers?
 - Presenting some assessment of the difficulty that may be encountered by construction vehicle of all categories endeavouring to pass on the roads surrounding Friston. For example, the A1094, the B1121, Grove Road, Church Road, Church Lane and Mill Road are all known by local residents to be very narrow in places and frequently present difficulties in passing and resulting in vehicle damage.
 - Acknowledging that one of greatest concern to residents of Friston is the use of lanes which cross the B 1121. These have no pedestrian footpaths, no passing places and have poorly defined driveways which exit straight on to the roadways.
 - Acknowledging that in many cases homes and house exterior walls are in many cases immediately adjacent to the roadway.
 - Acknowledging that public footpaths and children’s play areas border these lanes.

53. With the possible exception of the junction of the B1069 and A1094 at Snape, which is already viewed as an accident cluster, it remains a serious concern to the residents of Friston that the Applicant does not consider that the development will adversely impact road safety in the vicinity of Friston.

SECTION 3 - THE PRE-CONSTRUCTION ROAD AT FRISTON

54. The Applicant has from the outset produced Works Plans using a red line to show the outline of their Proposed Onshore Development Area. (June 2018), that is, a generalised outline of the land they wish to use as set out in subsequent plans. Appendix 26.18 Environmental Statement Vol 3 Drawing TP-PB4842-DR014 Vol 3 [APP-543] see **Ref 14**

55. Shown on the map is the area where a Pre-Construction Road is planned but the detail of the road cannot be discerned as the image has been overlain over by an example of a 'Road Works' sign, making it impossible to see clearly the extent of the intended construction. Works Plans Sheet 6 and 7 [APP-001] & [APP-002] see **Ref 15**.

56. The Works Plans of 12/09/19 gave the first indication that the "generalised redline" used in previous plans would become a Pre-Construction Access, when previously the red line merely indicated "Area of Works ". It is emphasised: the Applicant gave no indication the thin red line would become a road! What has now become apparent is that despite assurances by the Applicant to the contrary, and it was never given at all PIDs, there was to be a major access to the onshore development in the village of Friston. This access to the Pre-Construction now will be adjacent to the haul road crossing Point 11& 12 on Grove Road Friston and will enable vehicles to leave the haul road and enter Friston.

57. The Applicant must explain:

- What is the purpose of the Pre-Construction Road?
- What type of vehicles will access this road and how many?
- When will this Pre-Construction Road will commence to operate?
- How long will it be in operation?
- What route will vehicles take to access the road?
- Why it avoids showing on all maps just how close to Friston village is this new access to the haul road
- Why this Pre Construction Access road was not included in all earlier consultations?

58. Access to this Pre-Construction Road, can only be achieved via Grove Road or via a single track lane (Church Lane/Church Road) adjacent to the Grade II* Parish Church. Vehicles would need to enter Friston by either B 1121 North and South [designated Links 5 or 7] or via Mill Road, which is a single track lane leading to the A1094. Links 5b and 7 have been identified by the Applicant as high risk.

59. It is emphasised that Grove Road is a narrow winding rural road within the village of Friston.

- It has limited passing facilities
- Blind bends
- It has no pedestrian footpath
- Many properties access directly on the road.
- It is part of the National Cycle Network and Sandlings Walk
- The children's playground and Village Green border Grove Road and have no safety barriers

Photographic evidence to support the above is available.



60. While SPR have stated there will be no construction HGV traffic through Friston it has not made the same statement regarding LCV or LGV. It is thus highly unsatisfactory that the plan for this Pre-Construction road has only become visible with the submission of the DCO. It thus appears that it has been the Applicant's intention to make the relevant information available when the opportunity to mount a challenge has been significantly reduced.

61. **Severance** Regarding severance of the village, the Applicant quotes in Chapter 26 Environmental Statement page 21 26.4.3.1.1 Para 67 [APP-074] **Ref: 16** the following:

Severance is the perceived division that can occur within a community when it becomes separated by a major traffic artery. The term is used to describe a complex series of factors that separate people from places and other people. Severance may result from the difficulty of crossing a heavily trafficked road or a physical barrier created by the road itself. It can also relate to relatively minor traffic flows if they impede pedestrian access to essential facilities. Severance effects could equally be applied to residents, motorists, cyclists or pedestrians.

It is considered that the volume of vehicles needed to support the construction of 3 large electrical substations in close proximity to a small rural village could result in severance.

62. Paragraph 128 of Chapter 26.[APP-074] It is evident from Table 26.13 that the B1121 (links 5 and 7) has a collision rate that is higher than the national average for a comparable road type and may be particularly sensitive to changes in traffic flow / type. In addition, the A1094 (links 6 and 8) has a collision rate that is just below the national average.

63. Paragraph 129 of Chapter 26. These links (links 5, 6, 7 and 8) are considered potentially sensitive to changes in traffic flow and are therefore assessed further in section 26.6.1.10. The remaining links have collision rates below the national average and are therefore not considered further.

64. Taking the above into account, SPR should be required to show that the traffic increase associated with Pre-Construction Road access on Grove Road and the movement of employees directed to use Access 13 will not lead to 'Severance' which will result in damage to the community of Friston.

SECTION 4 - ACCESS POINT 13

65. The Applicant has stated the intention to construct a Permanent Operational Access Road (POAR) between the substations and the B1121 north of Friston. This point is designated by the Applicant as "Access 13 Permanent Operational Access Road (POAR) " The approximate map reference is TM40160 61160 referred to in the Non -Technical Summary (NTS) **Ref 17 [APP- 572]**

66. The Applicant must clarify the use of the Permanent Operational Road at Access Point 13. The Applicant has indicated that this access, Access Point 13, will be used for the delivery to site of a maximum of 4 Abnormal Indivisible Loads (AILs) which will require temporary local widening of the B1121 to permit entrance. Given that Access Point 13 POAR will be required to meet a certain standard to accommodate the single one way delivery of the AILs.

- There is no evidence put forward by the Applicant that the POAR needs to be 8 metres in width to accommodate the passage of an AIL typically carrying an HVAC transformer, generally moved on a 14 axle transporter.
- Why is the POAR of such a high specification of construction?

67. In addition the AIL Survey Document (**Ref18**), carried out by Wynns for The Applicant, states:

"The load carrying capability of roads depends to a great extent on axle loading rather than total weight of the load being transported. The load carrying capability of the route has to be assessed in relation to the loadings that would be imposed by the total gross weight of the load plus transporter for each item to be transported.The tractor unit is normally considered as a separate unit in terms of imposed axle and wheel loading.

Road Crust

"Road crust strength is important , but with the spread of load obtained with multi-wheeled transporters, it is not normally a problem, providing the road is maintained to a reasonable standard. "

The Applicant must explain why the level of construction of the proposed POAR at Access 13 is of a higher standard than is required for the delivery of the AIL.

68. Regards use of the Access 13 POAR during construction **Ref 19** Table 26.22

"Vehicles to travel from the A12 via 1094 before heading north to access 10 on the B1069, vehicles would then travel via the haul road and cross over Grove Road at access 11 and 12"

The Applicant must confirm all traffic throughout construction associated with the NG works will access via access 10 and not via access 13 because paragraph 213 conflicts with the statement in Table 26.22 above.

Para 213 – *"The proposed access strategy (set out in Table 26.22) is promoted for all employees with the exception of the National Grid employees. These employees*

*would instead access from access 13, the B 1121 link 5 (to the North of Friston)
once this access is available*

69. The Applicant has stated that no HGVs will enter or egress the construction site via B1121 through Friston. The Applicant and National Grid must confirm they do not intend to use the POAR at Access 13 for vehicle access during the construction of EA1(N), EA2 and NG substations plus later NGV interconnectors. Heavy Goods Vehicles (HGVs) over 7.5tonnes, 2 axle lorries over 3.5 tonnes but below 7.5 tonnes, Light Goods Vehicles (LGVs) up to 3.5 tonnes.

Relationship to link roads

70. The only route to Access Point 13 is either northwards from the A1094 through Friston village (Link 7) along B1121, (identified by the Applicant as Highly Sensitive with an accident profile higher than the National Average for a road of this standard) or southwards from the A12 to Friston (link 5) via the B1121 through the small village of Sternfield, identified by the Applicant as unsuitable for construction traffic.

71. The AILs will have travelled to Friston via A1094 and B1121, which in places are no more than 5 metres in width, but the Applicant has not explained why the POAR at Access 13 needs to have width 8 metres, which is greater than that of the immediate public highway. The B1121 as measured at this point is currently 5.1metres.

72. Examination of the Highways Agency map showing existence of approved laybys for AILs on the route from A14 at Bucklesham to Friday Street junction with the B1094 via the A12, shows none have a width much in excess of 4 metres.

73. The B1121 (links 6 and 5) is a two lane B-road, which lacks central white lines to demarcate the lanes in many places. The road has high hedges and blind corners and overgrown verges. Many of the larger LGVs have a width of ~2.5 metres excluding mirrors, making passing on sections of the B1121 difficult, resulting in damage to the verges.

74. The Applicant must therefore indicate how the proposed mitigation measures of additional speed restrictions or increased signage will benefit the passage of traffic.

75. The Applicant states after completion of the development the POAR at Access Point 13 will be used only for occasional maintenance required at the substation complex site. This statement poses a number of questions:

- What will be the frequency of use?
- Can the Applicant confirm this road will be used only for delivery of Abnormal Indivisible Loads (AIL's)?
- Can the Applicant confirm this road will only be used in the future for occasional Substation maintenance?
- Can the Applicant confirm this road will not be used by employees or for any construction traffic purposes relating to National Grid, National Grid Ventures, the Applicant's developments (EA1(N) and EA2, or any future projects - see cumulative impact below?
- Can the Applicant state why this POAR should not be reduced in dimensions after delivery of the AILs?
- Who will own the road and control its use after completion of the project?
- Can the Applicant confirm any successor owner will be put under an obligation not to use the road for HGV traffic?

IN CONCLUSION

76. A development of such enormous proportions will generate large amounts of traffic to:

- prepare
- build
- maintain

77. In the large volumes of information of Traffic and Transport there are many charts, tables, numbers, yet no detailed Traffic Plan will be available until after the approval of the development. Any mitigation measures put forward cannot be relied upon, and must surely be merely suggestions subject to change.

78. To interpret the charts or tables it is nigh on impossible to unravel the data

- the charts are so scattered within the documents
- the charts are so small they become unreadable in any attempt to access
- the figures from one chart to another chart become impossible to correlate or understand.

79. Why, in submitting plans for such a significant development, the Applicant has not addressed:

- the severity of impact on the residents of Friston village?
- the disturbance such a development will create preventing the residents engaging in normal activities, such as walking safely in the village?
- the potential disturbance to the daily lives of villagers in a manner which cannot be mitigated nor appears to have been addressed, save the banning of HGV's through the village?

CUMULATIVE EFFECT

80. Little information has been given about the impact of traffic associated with the future developments planned for this area and that assessed only in relation to the proposed Sizewell C development.

81. There has been no cumulative impact assessment in relation to the six other major offshore energy projects either which will or may well connect at the National Grid connection hub and which will involve substantial additional infrastructure being built in the area – see Written Representation in relation to Cumulative Impact and Written Representation in respect of Land Use.

APPENDIX - REFERENCES

1.	Chapter 26 Traffic and Transport Environmental Statement Vol.1
2.	East of England Route-based strategy evidence report 2014, 4.7.1 Conclusion Highways England East of England Route Strategy March 2017, pages 6-7 https://assets.publishing.service.gov.uk
3.	Suffolk County Council www.suffolk.gov.uk.uk Lorry Management
4.	www.eadt.co.uk . five-year-cycling plan (Suffolk County Council Unveils 148 priority cycle Improvements)
5.	An Evaluation of the Impact of the Dublin Port and HGV Strategy www.sciencedirect.com
6.	Traffic and Transport Chapter 26 Environmental Statement Vol. 125.1.1 A-roads Page 29 para. 109
7.	https://snapemaltings.co.uk
8.	Traffic and Transport Ch.26 6.1.8.1.4 Link 6 para. 252-261
9.	https://www.gov.uk/government/publications/guide-to-lorry-types-and-weights Ch. 26.6.1.8.1.4 Link 6 para. 252-261 Refers
10.	Traffic and Transport Environmental Statement Vol1 Ch. 26.6.1.5 Page 52 and Page 53 Tables 22.20/26.21
11.	Environmental Statement Volume 3 Chapter 26 Traffic & Transport Appendix 26 .14 / 15 refer to HGV and LCV Appendix 23 also 24
12.	Traffic and Transport Ch. 26 Environmental Statement Vol. 1 P26 Table 26.4
13.	Traffic and Transport Environmental Statement Volume 1 Page 52 and Page 53 Tables 22.20/26.21
14.	Appendix 26.18 Proposed Preliminary Access Concepts Environmental Statement Vol.3 Access 11 and 12
15.	Works Plans Onshore Sheets 6 & 7 Access to Works Plans Onshore Sheets 6 & 7
16.	Traffic and Transport Ch.26 Vol. 1 Page 21 26.4.3.1.1 para. 59
17.	Non-Technical Summary Page 34 para. 72 and Outline Illustrative Mitigation Plans Figure 29.11b
18.	Appendix 26.3 Environmental Statement Vol 3, 6.4.1 Wynnes AIL survey document
19.	Traffic and Transport Ch.26 Environmental Statement Vol.1 26.6.1 Traffic Assignment P55 para. 210 Table 26.32