

# SPR EA1N and EA2 PROJECTS



## DEADLINE 8 – POST HEARING SUBMISSIONS (ISH13) TRAFFIC & TRANSPORT

**Interested Party:** SASES

**IP Reference Nos.** 20024106 and 20024110

**Date:** 25 March 2021

**Issue:** 1

These submissions are made further to Issue Specific Hearing 13 which took place on Friday March 2021.

### **Agenda Item 2 – AIL and HGV**

1. Steve Merry on behalf of Suffolk County Council expressed serious reservations about the Applicants' proposals referring to them as the "least worst option" and expressing concerns about the resilience of the plans. This of course derives from the Applicants' inadequate site selection when in the RAG assessment they gave Friston a green rating in respect of accessibility<sup>1</sup>. That has proved to be somewhat optimistic. The contrast with the existing Bramford substation site (indicated with the red pointer) could not be more stark as can be seen from the map below. Bramford is accessed from the A14, the major trunk road which links the container port of Felixstowe to the national motorway network. Traffic travelling from Felixstowe merely has to exit the slip road to join the B1113, the first part of which is dual carriageway. It then needs to proceed for a short distance until it turns right onto Bullen Lane which is the access road to the substation. No railway lines have to be crossed and only a single watercourse. Further the traffic does not need to pass through any towns or villages. As Councillor Fellowes of Aldeburgh Town Council noted, the delivery of AILs to this manifestly easily accessible location still caused serious problems.

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-001052-6.3.4.2%20EA1N%20ES%20Appendix%204.2%20RAG%20Assessment%20for%20Onshore%20Substations%20Site%20Selection%20in%20the%20Sizewell%20Area.pdf>



2. In terms of resilience, when the Applicants when questioned on the likelihood of equipment failure which may require delivery of AILs in the future, the best the Applicants could do in support of their proposition that equipment failure will not arise was that the transformers “*were not designed to fail*”. Self-evidently nothing is “designed to fail” however the reality of the world is that equipment does fail. Furthermore if there are four items of a particular piece of plant then the likelihood of any one of those four items failing increases by a factor of four. These factors alone cause serious doubt on the viability of the Applicants AIL and HGV strategy.

**Agenda item 3(b) (d) &(f) – A12/A1094 Friday Street Junction**

3. Previous submissions have been made in respect of the signalling proposals for this junction the consequent congestion risks with knock-on effects of congestion and safety issues elsewhere – see paragraphs 23–29 of SASES Deadline 5 submission – Comments on Applicants deadline 4 submissions (REP5-097). Submissions have also been made in respect of the suitability of the A1094 to carry substantial volumes of HGVs.
4. The Applicants and outline construction traffic management plan (REP6- 009 (clean)) is inadequate in the following respects.
5. Table 2.1 details the forecast HGV movements on a daily basis. However there is no analysis as to how long this Will continue. This is relevant to understanding the duration of the disruption (noise, application, congestion etc) will continue). Also it prevents any analysis as to whether substantial HGV movements will clash with peak visitor periods and the numerous events which take place in this part of East Suffolk.

6. Paragraph 54 there should be no deliveries prior to 7 am in the morning or after 7 pm at night. Further (see third bullet) advice to drivers not to wait overnight is not sufficient. There should be an absolute prohibition on overnight waiting.
7. Table 2.3 - measures adopted during events. The controls around “managing traffic demand during major events on the highway (e.g. bike races praise et cetera) and around public holidays is inadequate given the multiplicity of major events which take place in this part of Suffolk. Those events may not constitute “major events on the highway” but they do relate to result in very substantial increases in traffic. Given the years which the Applicants have had to develop these plans it is unsatisfactory that the OCTMP clearly indicates (see fourth box down on the right) that the Applicants are not aware when major events will occur, not least given the multiple representations made by residents and interested parties during both consultation and examination. It demonstrates the Applicants have failed to engage with the traffic issues specific to this area.

### **Agenda item 3(c) – Traffic in Aldeburgh and Leiston Assessment of Existing Environment : Traffic Surveys**

8. As stated at ISH13, the Applicants’ assumptions about projected impact of Construction Traffic (including large numbers of HGVs) on existing rural roads in the locality was informed by Automated Traffic Counts (ATCs) of existing Annual Average Daily Traffic Flows. These were presented in the PEIR.
9. The Applicants correctly indicated at ISH13 that traffic surveys are essential in order to determine a least worst project design, but would seem to have relied entirely upon ATC data without ‘sanity checking’ the results through ‘eye ball’ observation of actual traffic flows.
10. A numerical distribution of vehicle types (by DfT class) should have formed the basis of SPR’s analysis of ‘present state’ traffic flow and should have been presented in the PEIR, together with a forecast distribution by actual class of vehicle planned for use during the construction programmes. The absence of such analyses has been a major shortcoming in the Applicants’ Traffic and Transport submissions.
11. Vehicles with Gross Weight in excess of 7.5 tonnes are at present a rarity on the quiet B class rural roads in the Substations and Cable Corridor area along which SPR intends to direct its HGV Construction traffic,
12. On some of the quiet rural roads along which SPR intends to direct its HGV Construction traffic, vehicles with Gross Weight in excess of 7.5 tonnes are at present a rarity. The Applicants’ PEIR ATC reports included DFT Class 5, type 2 R4 vehicles as HGV traffic.
13. It has been accepted by DfT that Class 5 counts are notoriously inaccurate. Most vehicles counted in Class 5 are actually small transit type delivery vans and lorries under 7.5 tonnes gross weight.
14. SASES anticipates that the majority of HGV traffic associated with EA2 construction having greatest impact on local communities would comprise Class 7, 35 tonne flat bed 4 axle flat bed lorries carrying aggregates etc. Consequently some of the PEIR forecast percentage increases in HGV volumes would be gross under estimates.
15. SASES presented detail at ISH13 on an example taken from the PEIR. The Classified 24/7 ATC carried out by Royal Haskoning DHV at Traffic Count 5 from 3 June 2018 counted an AADT of 139 HGVs passing along B1122 at Aldringham. Through subsequent examination

of this base data, SASES determined that 100 of those were type R2 / Class 5 and would have in the main comprised local delivery vans, not HGV's as the general public understands the term. The Applicants' ATC Survey counted only 39 vehicles in classes 6 to 11, of which 23 were buses.

#### **Agenda Item 4(e) – Cumulative effects**

16. The Applicants have made no attempt to assess what the cumulative impact may be of further energy projects in particular the two NGV projects Nautilus and Eurolink. SASES have made previous submissions on this subject in particular the expansion of the National Grid substation at Friston, the fact that National Grid take a “standard approach” to substation design and the documentation issued by NGV showing landfall between Thorpeness and Sizewell with a cable route, some or all of which will follow the cable route proposed by the Applicants. A key document is the Nautilus Interconnector Briefing pack published by National Grid Ventures in July 2019.
17. Given the traffic analysis of the area (however flawed) carried out by the Applicants and given the experience of the developers with similar projects, there should be sufficient information available to conduct a cumulative impact assessment recognising that of course some assumptions would need to be made. It is not acceptable that no attempt whatsoever has been made to cumulatively assess traffic impacts not least on the A12 and at the Friday Street junction which will inevitably be used as the access to this area.

#### **Agenda Item 5 - Any other business relevant to the Agenda - Stopping up of Streets**

18. The Applicants responded to ExQ1 on page 7 at para 1.6 Road Crossings [REP1-091] with a commitment regarding the Stopping Up of B1353 (Thorpeness Road), B1122 (Aldeburgh Road), Sloe Lane, B1069 Snape Road and Grove Road as follows:  
*"The Applicants' design basis for the crossing of roads is to use traffic signal control to reduce traffic down to one lane, allowing works to be undertaken on the closed lane. Once completed, open and closed lanes will be reversed allowing works to be undertaken on the newly closed lane. This process will be followed on the five public roads that the onshore cable route crosses. The Applicants therefore do not consider that trenchless techniques are necessary to cross these roads".*
19. It not clear how this commitment that those roads and pavements would not be fully closed during construction is secured in the Draft Development Consent Order.