

SCOTTISH POWER DEVELOPMENT CONSENT ORDER
WRITTEN REPRESENTATION OF
THEBERTON AND EASTBRIDGE PARISH COUNCIL (T&EPC)

Introduction

Theberton

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community, surrounding areas and hosts Duke of Edinburgh Award Scheme events.

Eastbridge

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is the location for RSPB Minsmere. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the dark skies, the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via the National Trust's Dunwich Coastguard Cottages.

The villages have a mix of properties owned and rented into both the tourist and private rental sector. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasant, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors benefit from the close proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Relevant Representation

We are concerned regarding the potential cumulative impacts of construction HGV and other associated traffic on the B1122, from its junction with the A12 to Lovers Lane in Leiston, from:

- The current two proposals from Scottish Power Renewables, for East Anglia Two wind farm;
 - On-shoring and landside developments being pursued in parallel with East Anglia One North
 - Or
 - On-shoring and landside developments separated by an unspecified time gap between East Anglia Two and East Anglia One North
- The Sizewell B Facilities Relocation
- The “early years” of any approved Sizewell C Construction when no relief road will be available but will potentially be under construction, according to current unapproved EDF NNB proposals

There are also four other potential developments in this area with as yet unknown development timescales, being Nautilus and Eurolink interconnectors and expansions to Greater Gabbard and Galloper wind farms some of which also have potential to overlap with these more developed projects.

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2. Open Floor Hearing Presentation 7 October 2020

The B1122 divides Theberton in two and has a 30mph speed limit through the village but has no pedestrian crossing. The B1122 is one of the main HGV access routes to the cable access points on Lovers Lane close to Sizewell.

Our speed indicator device records average speeds of just below 40mph at the entry to the village inside the 30mph zone.

We are concerned about the impact of increased levels of traffic that will be experienced in combination with the Sizewell B Relocation, early years of Sizewell C construction before the Sizewell Link Road is built as well as other wind farm and interconnector projects on the Parish.

As a Parish we are pleased to see that Scottish Power will update their assessment of cumulative impact as a result of EDF submitting their DCO Application to the Planning Inspectorate but are disappointed that there is no way that the impacts of other energy projects can be considered properly and assessed.

With up to 700 HGV movements per day from SZC alone, prior to the Sizewell Link Road being completed, the additional traffic due to the SPR project will cause significant issues for Theberton residents from;

- Ability to cross B1122 at peak traffic times
- Noise
- Pollution
- Vibrational damage to listed buildings with shallow foundations

When combined with regular SZB traffic and SZB outage traffic increases, daily increases could range between 30-50% above normal.

Traffic rat-runs are already a problem on some roads especially at shift change times and exacerbated during outages. Increased traffic will only increase such behaviour.

Eastbridge, close to RSPB Minsmere, is only accessible through single track lanes. The lanes have no speed limits, including through the village, and there is a connection road north to the village of Westleton, through RSPB Minsmere. This is a private road owned and maintained by RSPB.

As the B1122 becomes busier, traffic from the north will increasingly use this route.

During harvest time we are used to having to reverse to the few passing places in the lanes to allow large machinery and trailer tractors to get to and from the fields. Added rat-running will potentially cause chaos to these roads for farmers, residents and tourists alike.

Currently no mitigation is proposed by either Scottish Power for these projects or by EDF for the SZC project for the village of Eastbridge or for the B1122 through Theberton during the SZC early years or the two wind farm projects which are likely to be concurrent.

Addition of local speed limits within Eastbridge village and a pedestrian crossing in Theberton should be considered.

Another problem we are expecting is that of fly-parking by workers accessing these projects. This has been the experience at other large developments such as Hinkley Point and with the narrow nature of local roads and lanes will cause significant issues for residents, farmers, and tourists.

Ironically, with the staggered nature of these projects, SPR, SZC, Galloper & Greater Gabbard expansions, Nautilus and Eurolink interconnectors and the two National Grid Operator interconnectors from "Sizewell" to Kent, and no over-arching strategy or ability to coordinate the planning for all of these projects, all we can do is look on and be dismayed at the chaos and constant despoiling of the countryside from coast to yet another substation and national grid connection.

Whilst this may not be the responsibility or result of Scottish Power's DCO application per se, it is the inevitable and sad result for the residents of Theberton and Eastbridge and the surrounding area.

I endorse the points made by Peter Chadwick of Save Our Sandlings in the presentation prior to this.

3. Written Representation from T&EPC

In order to assess the cumulative impact of traffic on Theberton and Eastbridge by the three project phases that are most likely to overlap, namely;

- Scottish Power EA1N
- Scottish Power EA2
- EDF Sizewell B Facilities Relocation
- EDF Sizewell C Early Years Development

It would be helpful if all these projects collected and reported their data in a consistent manner to enable a rigorous cumulative impact assessment to take place.

Whilst the two SPR projects use a consistent format for reporting their transport levels unfortunately it is slightly different to that used by EDF. Also, within EDF reporting in document **6.11 Volume 10 Project-wide, Cumulative and Transboundary Effects Chapter 4 Appendix 4A** there are inconsistent gaps in the data resulting in it not being possible to get a full picture of traffic movements in both 2023 (early years) and 2028 (maximum work scenario) along the B1122 through Theberton and for access to the B1122 from Eastbridge close to where the eventual development site entrance will be for the SZC project.

We will be reporting these discrepancies to the Planning Inspectorate ExA for the SZC project.

Neither SPR nor EDF have monitored traffic flows to and from Eastbridge via Church Lane, Onners Lane, Potter Street or Eastbridge Lane but all these country lanes are used regularly by residents, visitors to RSPB Minsmere, the Eel's Foot Inn and two campsites at Eastbridge and will experience significant additional difficulties accessing the B1122 for travel to the A12 at Yoxford or towards Leiston.

Annual Average Weekday Traffic Flow (AAWT) figures for 2023 taken from EDF's transport tables and transport cumulative impact shows that whilst overall impact of SPR on the traffic flow at SPR Link 4 is <4%, HGV traffic increase from the SPR projects is >47%.

EDF also have examined the impact at a representative hour, 7:00-8:00am, as this is when there is likely to be significant overlap between SZC worker and HGV traffic as well as shift changes at SZB along with periodic additional SZB outage traffic.

Unfortunately SPR have not reported the traffic impact across the day so it will be difficult to determine the cumulative impact at a time when the residents of Theberton and Eastbridge are likely to be joining the B1122 to go to work themselves or for children catching school buses or being taken to school by their parents.

However, EDF's traffic plan shows that the increase in SZB/C related HGV traffic during this representative hour will increase by 440% compared to the AAWT increase of ~280%. There will likely be another traffic maximum after 3:00pm as we know that this is when the maximum HGV return traffic will leave the SZC development and this may partly overlap the afternoon shift change at SZB and school traffic.

Whilst the total numbers of vehicles along the B1122 do not saturate the capacity of the B1122, the cumulative HGV traffic increases are significant and will have a moderate to major adverse impact for those living along the B1122.

In EDF's **6.11 Volume 10 Project-wide, Cumulative and Transboundary Effects Chapter 4**, paragraphs 4.4.21 to 4.4.38, EDF assess that there is a major adverse effect on Amenity for the B1122 through Theberton (SPR Link 4) due to HGV traffic but oddly that no adverse effect on pedestrian Severance, Delay or Fear and Intimidation despite the very significant increases in HGV traffic at or around the time when pedestrian activity within the village of Theberton is likely to be at its highest. T&EPC dispute this analysis.

We realise that SPR's examination of cumulative impact from these projects is yet to be completed, but once complete should be made available for analysis and comparison to the analysis submitted by EDF within its DCO application and should any further ISH or OFH be held where this data was to be examined, T&EPC would reserve the right to participate in such hearing.

No specific mitigation has been proposed for householders along the B1122 for either project. In past consultation documents, there have suggestions by EDF for triple glazing, road changes, a controlled crossing and lowered speed limits, but these are now absent following the Sizewell Link Road proposal inclusion in consultation 4 and now the DCO. However, there are significant traffic impacts in the four and a quarter years prior to the SLR becoming a reality and it is this period where maximum cumulative impact between SZC and SPR projects will occur.

There are several listed buildings along the B1122 and within Theberton that are within 10 yards of the road and this level of HGV traffic will impact these buildings that have minimal to no foundations. EDF only consider these impacts for the operation phase of SZC and are ignoring the development period when the traffic impact is at a maximum.

Given the current differences in methodologies surrounding traffic impacts between SPR and SZC, it would be helpful to the residents in Theberton and Eastbridge Parish and the ExA to be able to see a consistent set of impacts that covered the cumulative traffic impacts both from an AAWT and Representative Hour (7:00-8:00am) perspective in the early years when no SLR exists.

We ask the ExA to have SPR break down their daily figures when they incorporate the SZC traffic figures from the current DCO so the impact can be properly assessed.

Since the OFH, EDF have announced a potential 14-point change to their DCO which will be consulted upon for one month starting 16th November, assuming the ExA for the SZC application agrees.

Several of the items within that consultation have the potential to reduce the overall traffic impact for the SZC application. It is not clear whether that reduction will affect the early years when cumulative impacts are greatest or whether the reductions will only impact the SZC project later in the development cycle and therefore have little effect on the early years.

Therefore, SPR's appraisal of the existing traffic impacts within the current SZC DCO application are likely to reflect a worst case scenario and will still be a valid and valuable exercise, especially if they can expand the analysis to include the representative hour.

Whilst the consultation will propose a number of changes including those affecting traffic impacts, until EDF inform the SZC ExA of the final changes it wishes to make to the DCO application after the end of the consultation, there is no guarantee that what is consulted upon will end up as part of the amended DCO application.

Based on existing data from the EDF DCO application we believe that mitigation is required along the B1122, in particular at Theberton (SPR Link4) to counter significant impacts for pedestrians and residents due to the impact of HGV traffic at peak times in particular. A pedestrian crossing and

monitoring of all listed buildings close to the B1122 within Theberton village should be included to ensure that no significant impact or adverse effects are experienced in Theberton.

4. Endorsements

We endorse the Relevant Representations of,

- SASES
- Save Our Sandlings
- Royal Society for the Protection of Birds
- Suffolk Wildlife Trust