

SPR EA1N and EA2 PROJECTS



DEADLINE 4 - COMMENTS ON APPLICANTS DEADLINE 3 SUBMISSIONS (TRAFFIC & TRANSPORT ISSUES)

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 13 January 2021

Issue: 2

INTRODUCTION

These comments relate to a variety of the Applicants' submissions made at Deadline 3 in respect of traffic and transport excluding the Applicants' comments on SASES' written representations which SASES made at Deadline 1 which are dealt with in a separate document. The fact that a comment is not made any particular submission should not be construed as SASES agreeing with the submissions made by the Applicants.

Outline construction traffic management plan - SPR Document 8.9 000943 Rev 01 [APP-586]

1 Introduction

Para 3 The OCTMP states that the final CTMP will not be presented until after appointment of contractors. The statement can be interpreted as not providing a CTMP until all sub-contractors and yet lower tiers of contractors are appointed. This opens the prospect of a fully definitive CTMP not being agreed until after commencement of works.

Para. 4 It is noted that Final CTMP appears to be limited to procedures for HGV traffic during the construction phase. There is no mention of pre-construction traffic, post construction traffic, or the operational phase, nor any mention of non-HGV traffic.

Para 19 Plate 1.1 indicates that the TCo (traffic coordinator) will be an intermediary between the local community, Parish Council and LAs (Highways) and SPR. This approach is considered to be a recipe for the dilution of local residents concerns.

Para 22 Refers to the appointment of a Local Community Liaison Officer, but fails to indicate remit or hierarchic position.

2 Control of HGV Movements

Para 24 The OCTMP reiterates that the Applicant considers the environmental impact of traffic would not be 'significant', that is, '**not significant**' in terms defined by the Applicant. Local residents may well have a difference of opinion on what is / is not significant.

Para 31 The OCTMP Indicates that all HGV construction traffic will enter the substation and NG sites via Access 10, yet drawing in the Outline Access Management Plan (OAMP) [Reference SPR Document 8.10 IBR – 00944] shows the splay at Access 13 is sized to accept a 6-axle HGV. [See– Plate TP4842-DR022].

Para 32 The OCTMP fails to make clear if the above restriction applies to HGVs and HGVs only. The OCTMP must clarify exactly the numbers and type of all other vehicle types entering or leaving via Access 13, including light commercial vehicles and employee vehicles.

Para 34 It is noted that the OCTMP states all HGV requiring access to the NG substation site will enter (and leave?) by Access 10. What is not clear is the size and composition of the additional traffic requiring access to the NG substation via Access 13

Para 35 Table 2.1 indicates likely daily peak HGV movements at Access Points 1&2 is 152 (Scenario 1), and at Access Points 9&10 is 255. Given a 12-hour working day, this is a movement rate of one every 3 minutes: given an 8 hour delivery slot this gives an HGV every 2 minutes – not exactly lacking in “**significance**” as stated in Para 24. Note this is just the HGV estimate. There are likely to be numerous other movements by smaller goods vehicles, ie < 7.5 tonnes GLW.

Para 38 The OCTMP indicates that the final CTMP will introduce a delivery booking system but fails to define what category of vehicle will come within the remit of a ‘booking system’. The Applicant must acknowledge that deliveries by goods vehicles just below the HGV starting point of 7.5 tonnes GLW are a realistic proposition if local suppliers are involved. Where are the figures for this class of vehicle?

Para 40 The OCTMP states aggregates will be off-loaded and be stockpiled, and then loaded according to need. This action has the potential to generate considerable noise in an area close to residential property (Knodishall). No consideration of the noise issue is contained in the Applicant’s analysis of construction traffic noise. The OCTMP fails to note the process of stock piling will lead to increased HGV movement whilst assembling the stockpile.

Para 41 Offloading / loading of aggregate at 7:00 am could be regarded as a considerable nuisance by residents living in close proximity to the Consolidation Compounds.

Para 48 States use of a pilot vehicle to gain site entry at Access Points 5&6 would be “infrequent”. The OCTMP needs to provide a definition of this term as it is difficult to extract this from other data.

Para 53 Table 2.2 The OCTMP needs to include a list of those events it considers impacted by site traffic. Most local events are planned and known to the police years in advance. There is no indication that the Applicant has gathered data from Local Authorities or Police regarding impact of events on site traffic.

The OCTMP fails to address the production of contingency plans to cope with an RTA on the stretch of A12 between Marlesford and Friday street to ensure local roads are not used by site traffic as relief roads. Given the likely impact on local villages as HGV and other drivers seek to meet pre-set schedules, this is considered a serious omission.

Para 57 Annex 2 Indicates that “Non-Special AIL” movements will average about 16 per month over the 36 month construction period (Scenario 1), occasionally requiring 2 or more movements per day. The Applicant should acknowledge that this has the capacity to cause delay and diversion on local public roads.

Note: Annex 2 Indicates a total of 39 heavy plant vehicles being on site in Sections 1,2 & 4 plus National Grid works in month 1. There is no indication of how this would be accomplished as it would seem that an operational haul road were necessary to distribute these items. Without a haul road plant would need to access the NG site via crossing point 11/12 (Grove Road) requiring plant movement through Friston, which would lead to chaos in a small village.

The OCTMP contains no statement regarding the effect of later non-special order AIL movements’ with respect to local traffic disruption, delays, congestion.

The OCTMP needs to clarify that Non-special AILs are excluded from the HGV category.

Para 59 The OCTMP addresses HGV emissions but no comparable assurances are provided regarding on-site emissions by heavy plant.

3 Offsite Highway Works

Para 61 Annex 3 of the OCTMP depicts several off-highway 'mitigation' works. There are however other off-highway works at 4 other sites: Marlesford, A12/A1094 junction (Friday Street), A1094/B1121/B1069 junction, and B1121 at site Access 13. Each of these has the potential to cause driver delay or diversion but the OCTMP fails to indicate the likely magnitude or duration.

Refers to works to be undertaken at the A12-A1094 junction (Friday Street) but gives no indication of planned duration or likely effect on congestion at the junction

Para 65 Refers to works to be undertaken in the vicinity of the A1094 and B1069 junction at Snape: again there is no indication of duration or likely effect on the Snape crossroad junction. The junction is frequently congested in the peak holiday season and when events are being held at Snape Malting. Roadworks in the area have the potential to adversely affect safety by obstructing vision of on-coming traffic.

Paras 72, 73 & 74 Church Road Friston. The document fails to acknowledge that the proposed works will take place in immediate proximity to residential properties, the Village Hall and Parish Church, for which there is no alternative vehicular access. The OCTMP should have indicated that satisfactory work round plans will be established. Consultation by the CTMPCo is an inadequate response.

4 Monitoring and Action Plan

Para 78 et seq State that HGVs associated with construction will carry an identifier marking and be subject to monitoring and control. SPR should institute a similar arrangement for **ALL** vehicles associated with the Project, some of which may be up to 7.5 tonnes GLW, and not readily separable when viewed by the average observer, from an HGV weighing 10 tonnes.

Synopsis

1. The Outline Construction Traffic Management (OCTMP) presents information on the management of HGV traffic but fails to indicate how all other vehicular traffic will be managed. No data is presented to show that the effect of all non-HGV traffic may be safely ignored.
2. The OCTMP indicates there may be stockpiling of aggregates at Construction Consolidation Compounds, but there is no indication that aspects such as noise and short term increases in HGV movement have been considered.
3. In the OCTMP the Applicant enters the opinion that the impact of 400 peak two-way movements of HGVs in the development area is 'not significant'. To village residents, the passage of an HGV every 2-3 minutes is far from insignificant, especially if swelled by non HGV site traffic.
4. No data is provided to show the impact on traffic congestion of non-special AIL movements, nor of roadside works.

Outline travel plan - SPR Document 8.11 IBR – 000945 Revision 01 [APP- 588]

1 Introduction

Para 4 States final detailed Travel Plan (TP) will be produced post consent, prior to commencement of onshore construction. Elsewhere the Applicant has indicated a period of pre-construction work. Where is the TP relating to this activity?

Para 5 States that the OTP covers employee movement and not HGV movement. What control will be exerted by the Applicant regarding vehicle movement that is neither employee or HGV ? Excluding AILs, there must be other vehicle movements, such as LCV and LDV in the category >7.5 tonnes which have been excluded (or forgotten?)

Paras 16-19 The OTP envisages the existence of multiple contractors each appoint its own TPCo: this opens the door to multiple interpretations of travel policy, with Applicant acting as a “go between” Highways Stakeholders and Local Community and the plethora of contractors and sub-contractors. Plate 1.1 should make it clear that the Applicant is ultimately responsible for the activity of all contractors and sub-contractors in respect of vehicle movement.

2 Control of Personnel Movements

Para 24 The OTP concludes that when proposed mitigation measures are embedded, the Environmental Impact of employee vehicle movement would not be “significant” in EIA terms. It should be noted these EIA terms appear to be constructs developed by the Applicant and not defined independently.

Para 25 The Applicant has not presented any evidence from other developments to support the assertion that average employee vehicle occupancy is ≥ 1.5 .

Para 28 It is noted that the OTP does not prescribe routes by which site employees should travel. This means that local residents will be faced with increased traffic on minor roads and by-ways at peak time of usage (school runs etc).

Para 30 The OTP states: “...The Applicant has mitigated the risk of not meeting the employee car share ratio of 1.5 through commitments and measures contained within the OTP.....” The Applicant should explain or enumerate these measures.

Para 31 The OTP acknowledges the potentially significant impact of site traffic at the A12/A1094 road junction (Friday Street) and A1094/B1069 (Blackheath Corner) and proposes measures to alleviate these impacts. The ensuing paragraphs 32 to 43 do not provide a convincing explanation of how the impact of site traffic at these junction will be reduced.

3 Monitoring, Enforcement and Action Plan

Para 45 The OTP indicates employee arrival and departure will be monitored, but fails to explain how this will “enforce” a car share ratio of 1.5.

Paras 45 to 49 The OTP describes a typical bureaucratic reporting plan but fails completely to show the need how this will provided expedient remedy for emerging congestion and traffic delay concerns.

Paras 50 The OTP seems here to have strayed into developing processes for handling ‘construction’ traffic rather than employee access traffic

Paras 50 to 53 The OTP puts forward a further bureaucratic plan to “enforce” the final TP, but suggested process seems most unlikely to resolve promptly a “here and now” issues concerning employee access behaviour.

Para 55 The OTP indicates that the Contractors will be left to develop their own measures to implement the provisions of the TP. There is no indication of how the Applicant, having overall responsibility for the process, will monitor, agree, accept changes etc to these measures.

Synopsis

This document does not address the relatively straightforward concerns by local residents that employee access to the development site needs to be managed without detriment to local traffic flow.

Outline access management plan SPR Document 8.10 IBR – 000944 Revision 01 [APP-587]

Introduction

Para 3 Indicates the Applicant (SPR) intend to provide the definitive position on Site Access, post DCO consent and after contractors have been appointed. The Applicant further wishes to define the term ‘contractor’ after DCO consent. Given that site access is required from Day 1, DCO consent should be conditional on provision of the Access Management Plan, with a formal control process for any change sought post consent.

Access Design

Para 13 Divides the onshore works into 7 areas, each requiring access from the public highway. Annex 2 of the Outline Construction Traffic Management Plan (OCTMP) [SPR Document 8.9 000943 Rev 02] details the movement of heavy plant (as non-special AILs), but fails to indicate their need for Access. Plate Figure 1 EA2- DEV-DRG-IBR 000741 dated 14/12/20, implies the existence of 6 other access points, approximate map references as below:

Grove Road Friston TM 41512 60512

Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816

Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720

Sizewell TM 45848 62480

Thorpeness TM 46480 60272

Thorpeness TM 47000 60000

The OAMP must indicate the purpose of these access points, stating clearly physical extent, frequency of use, duration of use and limitations to be imposed regarding plant type.

Regarding the above, note should be taken of a statement made in Chapter 6 of the Project Description, [vide 6.7.3.63] of reference to “Temporary Construction Access Roads”.

Para 15 Introduces the “temporary haul road” then in the following sentence uses the term “haul road”, then reverts again to “temporary haul road”. This inconsistent use of terminology by the Applicant, which occurs throughout the DCO submission, has caused much confusion to local residents trying to understand statements made regarding traffic, particularly those associated with HGVs. The Applicant should publish a statement to the effect that the term: ‘**temporary haul road**’ should be read as ‘**haul road**’ or vice -versa.

Para 15 contains the statement:

.....**All construction traffic to the onshore substation and National Grid Substation to avoid travelling via Friston or Sternfield by accessing from the B1069 south of Knodishall / Coldfair Green and travelling along the temporary haul road and crossing over Grove Road;**but

Para 16 contains the statement that:

...No HGV traffic would be permitted to travel via the B 1121 through Friston, Sternfield or Benhall Green.....

Para 18 Table 2.1 The OAMP again assures the reader that “.....Access 13 would provide a permanent access to the East Anglia ONE North and National Grid substations following completion of construction....” During construction the access would **only be used for Abnormal Indivisible Load (AIL) deliveries.**

These three statements are inconsistent. The OAMP must define explicitly:

- the exact purpose of Access 13 and limitations set during the construction of EA1N, EA2 and NG substations
- the extent of use of Access 13 post construction

Para 21 The OAMP now defines Access 13 as the intended permanent access to all three substations. No indication is provided regarding vehicle type, load type (special or non-special deliveries), access frequency or time of day or approach direction (Sternfield or Friston). The Applicant must as a matter of urgency provide ExA and local residents with relevant details.

Para 30 This OAMP fails to define whether or not the crossing at Access 11 & 12 will be manned: visibility for southbound traffic is limited because of adjacent woodland and mud/sand from site traffic will give rise to a significant skid risk. Local knowledge associated with movement of farm vehicles knows this section of road to present a significant collision risk. No evidence is presented to show that signage or reduced speed limit will prevent collisions at this crossing.

Traffic Management

Annex 1 – Plate TP PB4824 DR 022 shows clearly that the splay at Access13 has been sized on the basis of the largest category HGV, (six -axle, 44 tonnes GLW). This again contradicts statements made in paras 15 and 16 above.

The diagram clearly shows an HGV heading in the direction of Sternfield suggesting that the Applicant has always envisaged HGVs entering/leaving the site from the B 1121 via Sternfield

Synopsis

1. The Applicant needs to produce a clear, unambiguous statement of the purpose and use of Access 13 for the duration of:

The Pre-construction Phase

The Construction Phase (National Grid Substation)

Construction Phase (EA1N and EA2)

Operational Phase

2. The Applicant needs to disclose the purpose and use of any pre-construction access points, such as may be inferred from Drawing EA2-DEV-DRG-IBR-000741 at the following map references:

- Grove Road Friston TM 41512 60512
- Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816
- Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720
- Sizewell TM 45848 62480
- Thorpeness TM 46480 60272
- Thorpeness TM 47000 60000

3. The OAMP should clarify whether haul road crossings where there is no access (ie crossings 3/4, 7/8 and 11/12) will be permanently manned to reduce risk of collision with local road users.

4. The Applicant should review all published text with respect to traffic management to ensure there is no ambiguity in terminology, eg “haul road” or “temporary haul road”.

5. It appears that the Applicant intends to delay proper definition of site access to post DCO and appointment of contractors. This is viewed as unacceptable as this would allow a ‘contractor’ or even a ‘sub-contractor’ to re-define use of an access, possibly detrimental to local residents.

6. The OAMP contains diagrams showing roadside alterations at crossing points for the haul road, and these are referred to as access points. The Applicant needs to make it clear in this documents and in the OCTMP that crossing points 11/12, 8/7 and 4/3 **will not be** used as access points from the public road system, and that this restriction applies to **all** categories of vehicle including employee private transport.

Traffic and Transport Deadline 3 Clarification Note [REP 3-055]

Para	Comment
1	No Comment (N/C)
2	N/C
3	N/C
4	States note contains details of all road closures. This is inaccurate See response at para 14
5	Refers to Chapter 26 Traffic & Transport [APP-074] – Drainage Connections on Church Road Friston
6	Note 3m lane width and 0.5m lateral safety clearance
7	Note 3 metre road width – will cause delays as buses and delivery vehicles will need to slow to walking pace to navigate
8	As above
9	N/C
10	N/C
11	States a working area of 2.5m would be needed - Surely 2.5 m width
12	Assumption by Applicant that minimum road width of 5.0 m is OK Explain “accomodation works”
13	States B1121 as having a width of 5.8 metres. Measurements made of road width using laser range finder (quoted accuracy 0.01 metre) indicated road width in vicinity of projected Access 13 to be 5.1 metres (tarmac width)
14	Omits to mention Church Road (para 5 above) is single carriage way with no passing places other than to use residents driveways over its complete length. Road widening is not an option.
15	N/C
16	Mentions Grove Road temporary widening: does not mention re-instatement
17	APP-074 not AP-074?
18	The proposed works will inevitably interrupt traffic flow (some of it large farm vehicles). Any diversion for those for residents living to the north of Friston and wishing to visit church, Village Hall, pub, bowls club or get to the petrol station at Snape will involve an additional journey of several miles.
19	Explain fully the term “alternative accomodation works”

20	Shows only works from one side of road. To complete a crossing in two stages, surely a second widening of the road on the opposite side is required. If so why does Plate 2 not indicate widening of both sides of road?
21	States the approach will permit roads to remain open whilst cables are installed: no account seems to have been taken of the need to have working plant in close proximity to passing traffic.
22	N/C
23	N/C
24	The Applicant has based the assessment of movement of traffic past projected roadworks on a maximum HGV width of 2.5 metres. Does this include wing mirrors? If the footpath works involve kerbing, then the parked HGV(s) will require more than 2.5 metres of the available road width.
25	N/C
26	The Applicant fails to mention that at the junction of the A1094 and B1069 visibility of the approach is severely limited. The parking of HGVs on either the A1094 or B1069 presents an existential threat to the safety of local road users.
27	It is noted that the need for additional safety measures at the A12/B1094 junction (Friday Street) to lessen the impact of the Applicants HGV (and other) movement is, ongoing with SCC.
28	N/C
29	N/C
30	It is noted that this 'Clarification' states "...the Works Plans (Onshore)...identify the potential requirement to undertake works along Church Road Friston" Are works required or not ? The Applicant should not equivocate.
31	It is clear that to accomodate such works will require road closure, preventing access to residents, Village Hall and Church. Statements like "temporary closure" and "short period of time" are inadequate.
32	As above
33	The Applicant again uses the term "temporary", here in relation to changes to the currently prevailing speed limit. Where such changes are applicable to the duration of the Project , then the word "temporary" should be replaced by " for the duration of the Project"
34	See above comment
35	N/C
36	Given that the A12/A1094 and also A1094/B1069 junctions currently accomodate the passage of HGVs, why is it felt necessary to carry out

	this work? Is this an acknowledgement by SPR that without such work the projected increase in traffic is prejudicial to the safety of other road users for the duration of the Project, or is just to accommodate passage of HVAC transformers using AIL delivery? Note: later §40 which acknowledges that the increase in construction traffic is potentially prejudicial to road safety.
37	N/C
38	See comments on §36 above
39	The Applicant should make clear that changes to the speed limit on A1094 and B1069 are for the duration of the roadworks only. If other periods of change to speed limits are envisaged then this should be clearly stated.
40	See §36 comment above
41	Can the Applicant supply calculations to support the assertion that reducing the posted A12 speed limit from 50 mph to 40 mph in the vicinity will result in a reduction impact (poor choice of descriptor!) significance from major adverse to minor adverse.
42	Whilst it is accepted that a temporary reduction in the posted speed limits on the A12 and A1094, (here taken to apply solely to the duration of road alterations and assumed to be limited physically to the environs of the proposed road alterations), it is unclear how this would minimise delays to road users as stated.
43	N/C
43	N/C
44	N/C
45	It is assumed that police and SCC would determine appropriate speed limits and not SPR or any of its sub-contractors
46	It is noted that “..No construction access or egress would be permitted from crossing points”...The use of the verb form “would” contains overtones of conditionality. The Applicant should make this statement abundantly clear and show intention to abide by the restriction. See also comment s applicable to Sketches on pages 10,11 & 12, and Appendix 2
47	N/C
48	The paragraph uses the term “temporally” , which does not have the same meaning as “temporarily”. The Applicant should make clear when using the term “temporary” to mean for the duration of the programme.
49	N/C
Table 3.1 Pages	The text relating to crossing 3/4 uses the term crossing 3/4. And the sketch shows Crossing 3/4 as Access 3 and Access 4. The Table should

10 11 12	<p>be amended to make clear to all readers that this is a “crossing” and not an “access”.</p> <p>This comment applies to crossing points 7/8 & 11/12.</p> <p>Also, the sketch should make clear that speed limit reductions are for the duration of the programme if that is the case.</p>
51	N/C
52 Table 3.3	Again refers crossings 11/12, 8/7 and 4/3 as “Accesses” The Applicant should make clear these are not “Accesses” but crossings.
Appendix 1	<p>The Highway works, Drawing EA1N-EA2 –DEV-DRG-IBR-001254 fails to explain the purpose of the intersections of the development area with the local road network at the following approximate map references</p> <ul style="list-style-type: none"> • Grove Road Friston TM 41512 60512 • Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816 • Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720 • Sizewell TM 45848 62480 • Thorpeness TM 46480 60272 • Thorpeness TM 47000 60000 <p>These have previously been referred to as “pre-construction roads”, although their purpose has never been disclosed.</p>
Appendix 2 Crossing 4/3	Drawing TP-PB4842-DR027 should make clear that this is not an “Access” but a crossing
Crossing8/7	Drawing TP-PB4842-DR007 should make clear that this is not an “Access” but a crossing
<i>Crossing</i> 11/12	Drawing TP-PB4842-DR014 should make clear that this is not an “Access” but a crossing
Access 13	<p>Why does drawing TP-PB4842-DR022 show swept path for a 6-wheeled HGV, no HGV are permitted access from the B1121 via either Sternfield or Friston and the drawing text box state: ..ACCESS 13 B1121 SAXMUNDHAM ROAD MAX ARTICULATED HGV SWEEP PATH ANALYSIS..</p> <p>Access 13 is described elsewhere IN SPR documentation as the intended access point to the substation complex for the AIL delivering the HVAC supergrid transformers. Why then does the drawing not show the impact of the swept areas for a multi-axle low-loader delivery</p>