TECHNICAL NOTE

Date: 22nd June 2021

File Ref: P21-2187

Subject: **Grant Family – Deadline 3 Response**

1.0 DEADLINE 3 - SUBMISSION

1.1 Create Consulting Engineers have been appointed by the Grant family to provide a written response at Deadline 3 in line with the Planning Inspectorate timescale.

1.2 The purpose of this submission is to build upon the Deadline 2 submission with specific reference to;

- Highlight the severance of the Grant family home to Middleton and other important habitations as a result of the SLR; and
- Highlight fundamental concerns regarding the effect of the Sizewell Link Road (SLR) on the Grant family's home, specifically in relation to:
  - Noise
  - Lighting
  - Dust
  - Visual impact
  - Farm viability

1.3 Reference is made to the SLR Plans for Approval Parts 1 and 2, along with the DL2 Applicant documents supplied on 4th June 2021.

2.0 SEVERANCE

2.1 The Grant family own and actively farm land within the SLR DCO area. The family are directly affected by the DCO and associated works, specifically the Sizewell Link Road. The family home is Fordley Hall, a listed Grade 2 building, which is accessed and connected to Middleton via Fordley Road and Littlemoor Road, as reproduced in Figure 2.1.

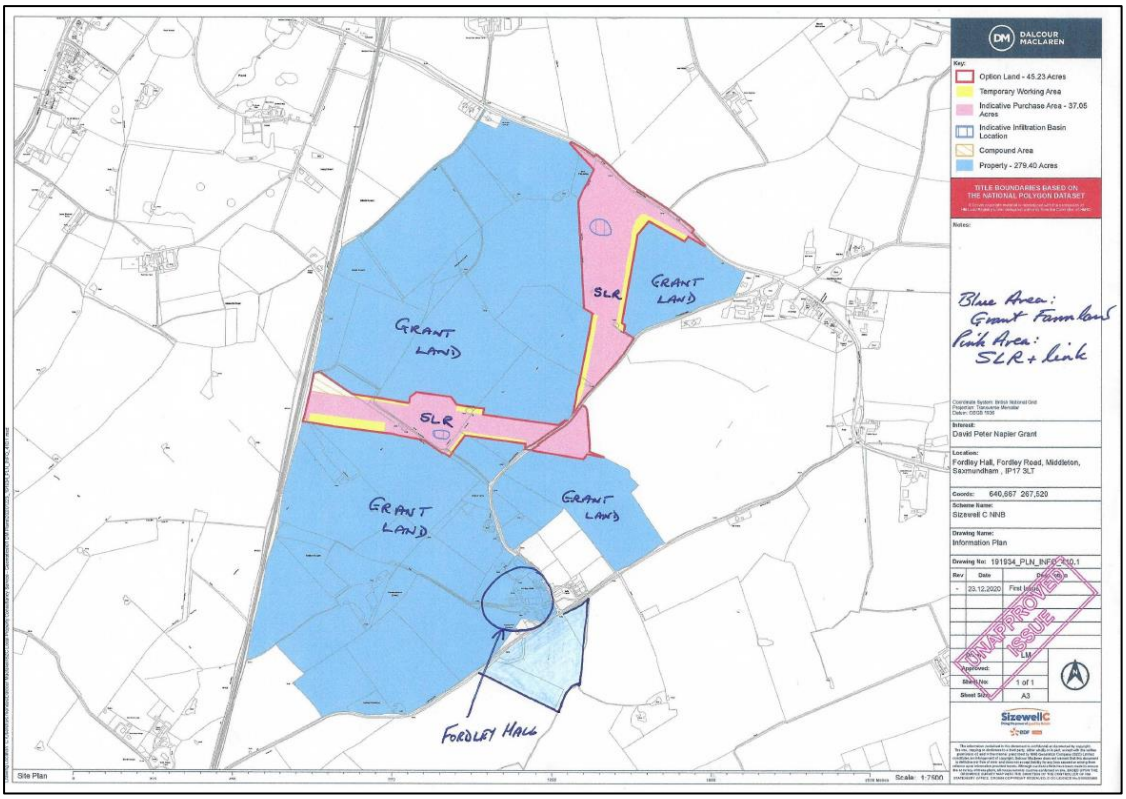

Figure 2.1 –Fordley Hall Farm Dissected by SLR

Fordley Road Closure

2.2 The concluding point from the Create DL2 submission considered the closure of Fordley Road as fundamentally flawed, severing several communities, as well as local residents of Middleton cum Fordley from important services, disrupting the Grant's and other local farming operations. This effect creates a potential rat run to the A12. All of which fail to deliver the legacy benefits promoted by the Applicant.

2.3 The removal of the SLR junction to Fordley Road south and the reinstatement of the Fordley Road connection whether by overbridge or underpass are therefore considered essential.

2.4 All points raised by Create within **the DL2 submissions remain relevant**.

2.5 Further points following a review of the Applicants DL3 submission are subsequently made below;

- The **Consolidated Transport Assessment** provides no junction performance assessment of the SLR / Fordley Road south junction. Create consider this is essential.
- The **Consolidated Transport Assessment** provides no base, construction, or future year traffic information along Fordley Road south. Create consider this is essential to fully explore the effects.
- The **Consolidated Transport Assessment**, specifically the Sizewell C Stage 1 Safety Audit, are considered insufficient. Create make the following comments on the Road Safety Audit;

- The use of WSP as the Applicants Transport Consultant and as the Road Safety Auditor is not considered best practice and we request a third-party independent safety audit is completed;
- The level of detail supplied by the Applicant on the SLR alignment would allow a more comprehensive Road Safety Audit to be completed in line with the GG119 Road Safety Audit guidance Rev 2. There is at present no assessment on the planned form of junctions, traffic use, interaction with pedestrians and non-motorised movements. Such consideration it is fundamental to the discussion on the Fordley Road South proposals.

2.6 Reference is also made to the Applicants Consultation Changes document June – July 2021, specifically Change 18 Paras 4.2.1 – 4.2.5 and the Pretty Road / SLR junction removal with the replacement with a new overbridge, this concludes;

A bridge suitable for vehicles would enable vehicular access to land either side of the proposed Sizewell link road ***(a matter which the landowner has explained is important to facilitate their ongoing use of that land****).*

2.7 Fordley Road and the landowner severance is as bad, if not worse, than Pretty Road.

2.8 A technical solution is practical and viable and therefore a similar change is expected.

3.0 FORDLEY HALL DIRECT IMPACT

3.1 Create have reviewed the technical information supplied by the Applicant and highlighted several areas of concern, these are set out in the DL2 response and not repeated here.

3.2 The following comments are made as a result of the Applicants DL2 submission.

Noise

3.3 The ES details a preliminary assessment of construction noise, undertaken in accordance with Method 1 of BS5228-1:2009+A1:2014. The aforementioned standard details two acceptable methodologies for the assessment of construction noise. Method 1: the ABC method, and Method 2: the 2-5 dB(A) change method. Selecting an appropriate method is discretionary and whilst both are acceptable in broad terms, a distinction should be made based on situational context.

3.4 As the assessment was preliminary only, assessments of the anticipated works were not based on any contractor method statements, plant schedules or construction phase staging. The construction noise calculations (and in turn, the resultant effects) therefore, have been based on 'professional judgement' and assumptions on behalf of the acoustic consultants. Whereas this would be considered appropriate to assess a site's viability for development, it would not be considered representative of the actual resultant noise levels during the phased works.

3.5 To date, there have been no dedicated construction noise assessments conducted for the receptor sites. For example, the 'Enabling Works' Table (Appendix 4A1, Volume 6.5), has assessed the construction noise for this phase against the sound levels produced by a single excavator alone. It is not clear where the information for calculating the resultant impact at the Fordley Road *et al* residences originated; however, this assumptive approach would not be considered robust or exhaustive to assess any resultant impact in practice.

3.6 The Mitigation Route Map (8.12) details various measures of mitigation for specific works phases in broad terms, stipulating adherence to BPM 'Best Practicable Means' and the CoCP 'Code of Construction Practice'. These mitigative strategies have been based on the assumed construction activities (as discussed above) and have not been directly quantified at the receptor locations to judge their effectiveness.

3.7 The reported ambient levels in section 4.4.5 of the ES states the 'Typical Measured Level – Day' at SLR3 (Fordley Hall) was 45-47 dB $L_{Aeq,T}$. Using the ABC method, a negligible impact would be a resultant sound level ≤ 65 dB(A) $L_{Aeq,T}$, which could be up to 20 dB greater than the measured ambient level. Table 4.15 estimates the work phase noise at the receptor locations to be:

- Preparatory Works: 38-53 dB $L_{Aeq,T}$
- Main Construction Phase: 52-57 dB $L_{Aeq,T}$

3.8 This would equate to a maximum of 12 dB above the measured ambient, which using the ABC method indicates a minor adverse/not significant impact (as detailed in the Applicants Table 4.16).

3.9 Create consider an appropriate assessment method is to use the 2-5 dB(A) change method. Noise levels generated by site activities are deemed to be potentially significant if the total noise (pre-construction ambient plus site noise) exceeds the pre-construction ambient noise by 5 dB or more, subject to lower cut-off values of 65 dB, 55 dB and 45 dB $L_{Aeq,T}$ from site noise alone, for the daytime, evening and night-time periods, respectively; and a duration of one month or more, unless works of a shorter duration are likely to result in significant effect.

3.10 Section 4.3.26 states: "*For noise sensitive receptors where the magnitude of change in the short term is minor, moderate or major at noise sensitive buildings, local circumstances must also be considered to determine the final significance, as required by LA111."* As the new road would be used by most/all the construction traffic for the next 10+yrs, this would be indicative of a significant effect; in addition to the operational phase going forward beyond this point and should be assessed and mitigated.

3.11 **Air Quality** – The Deadline 2 submission remain applicable, and we seek a receptor specific assessment to consider the dust and air quality implications.

3.12 **Visual Impact / Lighting** – The Deadline 2 submission remain applicable, and we seek a lighting and visual assessment specific to the Client's dwelling and usable outdoor space.

3.13 Given the unique setting and background levels noted by the Applicant, Create expect either online mitigation measures, or direct measures within the Grant's property to adequately protect the family home and outdoor space from the SLR impact.

Ecology

3.14 Our Client notes in the DL2 Applicants submission some conflict with the ecological work. Our Client advises that Arcadis carried out their ecological surveys between July and September 2019 and there has been no ecological surveys during 2020.

3.15 The Arcadis summary report was received in January 2020.

3.16 Separate DL2 submission have been made on ecology by our Clients Team.

4.0 CONCLUSIONS

4.1 The purpose of this note is to expand on the DL2 submission and consider the direct effects of the Sizewell Link Road the Client's home, farming business, outdoor space and land interests.

4.2 Create have, in DL2, shown that the SLR / Fordley Road junction proposal is not safe for several reasons, this position remains and is strengthened with the Applicants submission documents and position taken over Pretty Road.

4.3 The retention of Fordley Road is considered essential to support the Client's farming building and to offer a permanent legacy benefit to the local area.

4.4 Create have reviewed the Applicants reports and DL2 documents on the Client's direct landholdings and home. It has been shown that several important areas have been missed which could have misrepresented the final impact outcome.

4.5 We consider several site-specific mitigation measures are required to adequately address the shortfalls.

Note By: Paul Zanna - Technical Director