



B1122 Action Group on Sizewell

Comments on responses to ExA's Written Questions (ExQ1)

Air Quality

AQ.1.56 Early Years

The applicant's air quality data shows that the A12 through Yoxford is already on the limits of acceptable particulate levels, with annual concentrations of 15.5 and 10.6 µg/m³ of PM₁₀ and PM_{2.5} respectively [location YX3, 2018 baseline - 6.8 Volume 7 Chapter 5, Table 5.10]. Yoxfords Primary School is only 200 metres away. The World Health Organisation's Air Quality Guidelines are 20 and 10 µg/m³ of PM₁₀ and PM_{2.5}, respectively. [http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/].

The applicant states in Tables 5.11 and 5.12 that particulate levels will fall during the Early Years, and further still once the Link Road is open. We find that inconceivable, given the substantial increase in vehicles of all kinds, including the near doubling of HGV numbers.

We recommend that the traffic and pollution modelling and the assumptions behind it are re-examined thoroughly by an independent authority.

Noise and Vibration

NV.1.52 Sizewell Link Road Preparation phase – significant adverse effects are identified at Fir Tree Farm, Rosetta, Dovehouse Farm, Church Farm, Rookery Farm and Keepers Cottage

We believe that the applicant's mitigation measures (section 4.7 in Volume 6, Chapter 4 of the ES) are insufficient, in particular as screening vegetation will take some time to grow. The applicant should add noise screening fencing and double/triple glazing.

We do not believe that sufficient weight has been given to receptors exposed simultaneously to Early Years traffic and SLR Construction noise, including Norwood House retirement home, Thatched House and other residences in Middleton Moor on the south side of the B1122, Garden House Farm, Annesons Cottage and Valley Farm. These should also be offered noise screening fencing and double/triple glazing. This also applies to receptors on the B1122 in Yoxford.

NV 1.76 Vibration effects on Heritage Assets

The applicant states that “HGV traffic does not typically generate vibration sufficient to reach thresholds of damage to buildings, including heritage buildings, except where there are defects in the road paving or supporting formation” without providing any reference or support. It may be that they are relying on Transport and Roads Research Laboratory reports 156 and 207 from the late 1980s, and the Design Manual for Roads and Bridges (DMRB) which is based on them.

Since then, the permitted size and weight of HGVs has increased from 38 tonnes to 44, and we submit they are no longer appropriate.

In 2008 the City of Bath, with the support of Unesco and Civitas, stated that ‘it was their belief that HGV vibrations are a cause of structural damage to historic buildings and set aside the advice and guidelines in DMRB’. (reported in ‘Context’, Institute of Historic Buildings Conservation, No 144, May 2016).

We would also refer the ExA to the following more recent studies:

Modeling Traffic-Induced, In-Dwelling Vibration Using Urban Design and Planning Variables, K. Mert Cubukcu, Journal of Architectural and Planning Research 32(4):307-323 December 2015

This states “A general review of the literature reveals that architectural damage may occur when the PPV exceeds 5 mm/s, and structural damage may occur when the PPV exceeds 10 mm/s for modern buildings.”

Traffic-induced vibrations. The impact on buildings and people. Anna Jakubczyk-Galczyńska, Robert Jankowski, The 9th International Conference “ENVIRONMENTAL ENGINEERING”, 2014

Which states: “Traffic-induced vibrations may cause plaster cracks, structural damage and even failure and collapse of the structure.”

There are listed buildings on the B1122, not least Theberton Church, while others in Yoxford, Middleton Moor and Theberton are very close to the road.

NV 1.77 Early Years

We maintain that the level of traffic generated during the early years creates an unreasonable burden on the local community in terms of traffic, noise and air quality. We do not believe that the applicant has addressed this sufficiently. They state that “these effects are only acceptable if there is no practical alternative and should not be sustained for longer than it takes to deliver the Sizewell link road.” There is an alternative: that the Link Road (ideally on the Route W North/ D2 route) be operational before work starts.

The applicant also states that “it would be unacceptable for these effects to be imposed on the communities along the B1122 for the whole 10-12 year construction programme.” It is hard to understand how it is acceptable for 2-3 years, which would be ample for a normal project, when it is

not for 10. Noise and air quality are experienced and measured on a day-by-day, month-by-month basis. Is the applicant seriously telling residents “It’s OK because it will be gone in two years time”?

We also note that the applicant’s Noise Mitigation Scheme would be “for properties within 300m of a new or altered highway”. Therefore, homes impacted by the Early Year’s use of the B1122 would not be included, no matter how badly they might be affected by up to 600 HGVs per day. Some homes on Middleton Moor are as close as 10 feet to the B1122.

The Noise Mitigation Scheme must be extended to cover homes within 300m of the B1122.

Traffic and Transport

TT 1.71 and 1.72

Transport Assessment (TA) [AS-017] – Junction Modelling Junction 13 A12 / B1122 Junction

The applicant was asked about the A12/ B1122 junction, both in the Early Years and once the roundabout has been built. We believe that their traffic data (Appendix 9B of the Transport Assessment Addendum) and their response to the ExA was too broad-brush, and did not properly cover the interaction between the B1122 Junction and the A1120 junction in both periods. No reference was made to seasonal peaks in August and the Latitude festival or daily ones - specifically the release of traffic from the Darsham rail crossing, or the substantial delays caused by the construction and integration of the new roundabout on the junction.

We maintain that for these reasons substantial congestion and particulate pollution exceeding WHO recommended levels will be inevitable, and we request that the applicant’s modelling data should be rerun by a qualified third party.

We ask the ExA that if the applicant’s traffic modelling proves to be overoptimistic (as we believe it will), and creates unpredicted significant congestion and pollution, what powers will be available to SCC or any other body to restrict SZC traffic movements in order to meet approved levels?

TT. 1.87 “Rat Running” Traffic Routes

The ExA stated that many Relevant Representations have raised concerns around rat running through less suitable routes by workers and traffic associated with Sizewell C. We believe these concerns are primarily about private commuter cars and contractor LGVs which the applicant concedes will have ‘route choice’.

The applicant does not consider this adequately in the Early Years phase, before the Park and Ride operations or the SLR will be in place,

We believe that the poor, North-West alignment of the Sizewell Link Road will exacerbate this issue, as many commuters and LGVs will ‘cut the corner’ southwards, and use inadequate country lanes (many of which are single track) via Knodishall, Friston and Coldfair Green. We are not convinced that the applicant’s modelling has accounted for this sufficiently.

We request:

- that the applicant institutes a tracking system for private worker cars and contractor LGVs to keep them to the allocated routes, either through GPS issued tracking devices or ANPR cameras,
- that SCC or another body retain powers to restrict worker car and LGV traffic if it exceeds approved levels,
- that activity on the Main Construction Site not commence until the Park and Ride operations or the SLR are operational.

TT 1.91 Sizewell Link Road -Traffic Analysis (Route Selection)

Like SCC, we maintain that the alternative Route W North/ D2 was not properly considered or modelled. The applicant assumed that the 10-15% of HGV traffic that would come from the North would be routed on the A12 through Yoxford to meet W North south of Saxmundham. They did not consider the possibility that this could be routed along the existing B1122. Initial discussions with Middleton and Theberton Parish Councils indicate that they would be open to a discussion on this, and that it may be a price worth paying to lose the proposed SLR route.

TT 1.92 and 1.93 Sizewell Link Road -Traffic Analysis (Legacy Benefit)

We believe that those Relevant Representations that state the poor level of legacy benefit from the proposed SLR route are comparing it with the alternative Route W North/ D2. The latter would reduce post-construction traffic through the villages on the B1122 by at least as much as the SLR.

It would also provide a much better route to reach the several proposed energy projects west and south of Leiston, and would connect Leiston directly to the A12. This would have a positive employment effect on the town once the construction 'boom' has abated – a significant problem after the construction of Sizewell A and B.

TT 1.95 Sizewell Link Road -Traffic Analysis (Early Years)

The ExA is absolutely right to point out the limitations of the Early Years strategy, which does not appear to deserve a section of the DCO application in its own right. This period will be exceedingly bad for the communities on the B1122. The applicant states that "disruption caused by construction traffic using the B1122 is kept to a minimum" but has proposed no significant mitigation. This is simply not good enough.

The applicant should be required to fund speed cameras and/or average speed systems, noise screening and vibration monitoring and pre and post surveys of vulnerable buildings.

TT 1.96 Sizewell Link Road - Pretty Road Vehicle Severance

We support the proposals to overbridge the SLR on Pretty Road without a junction.

We also support the requests by Interested Parties including Middleton Parish Council for a similar non-connecting underpass for Fordley Road.

