

DEVELOPMENT CONSENT ORDER EN010012 : THE SIZEWELL C PROJECT

Sylvia Ballard

24 September 2021

ISSUE SPECIFIC HEARING 12 – SESSION 3 Section 4 ii re: BRIDLEWAY 19 LEISTON CUM SIZEWELL

To the Examination Authority

Dear Mr Monde

Thank you for letting me speak on the matter of **Bridleway 19 Leiston cum Sizewell (BR19)** at Issue Specific Hearing 12.

I first raised my concerns about **BR19** in my submission [AS 333](#) where I stated:

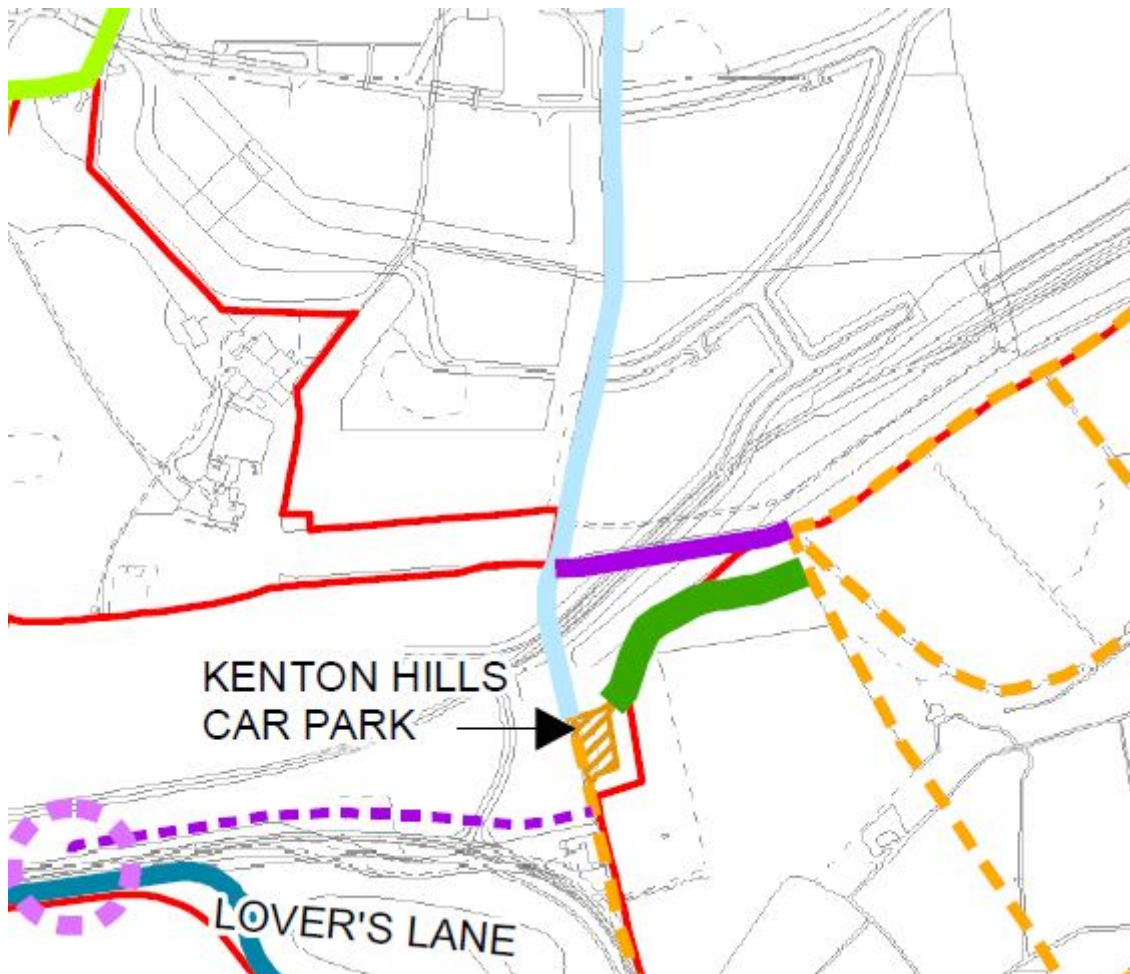
For the terms of the Development Consent Order EN010012-002875 SZC to be met, a suitable and safe alternative route for the northern section of Bridleway 19 Leiston cum Sizewell must be provided, be certificated by Suffolk County Council, and be open and available for use by horse riders and all other members of the public before any temporary stopping up can be authorised and before any construction work affecting BR19 can commence. However, the only possible alternative route for BR19 will not be available until the end of the initial construction stage. As BR19 is located within the construction site, the route cannot safely remain open to the public during the construction of the alternative route. This conundrum has not been adequately addressed by the applicant of DCO EN010012-002875 SZC .

The requirement to provide a safe alternative route for any ‘street’ as part of **Development Consent Order EN010012-002875 SZC** is a material consideration.

I note that there are some subtle changes to **The Sizewell C Project 6.3 Volume 2 Main Development Site: Chapter 15 Amenity and Recreation Appendix 15I of the Environmental Statement: Rights of Way and Access Strategy September 2021** that involve **BR19**

In this document section 1.2.18 describes the new off road combined bridleway, cycleway and footpath, which would include the temporary diversion of **BR19** which

would run roughly parallel to roads but mostly separated from them, with crossings as shown on Figure 15l.2



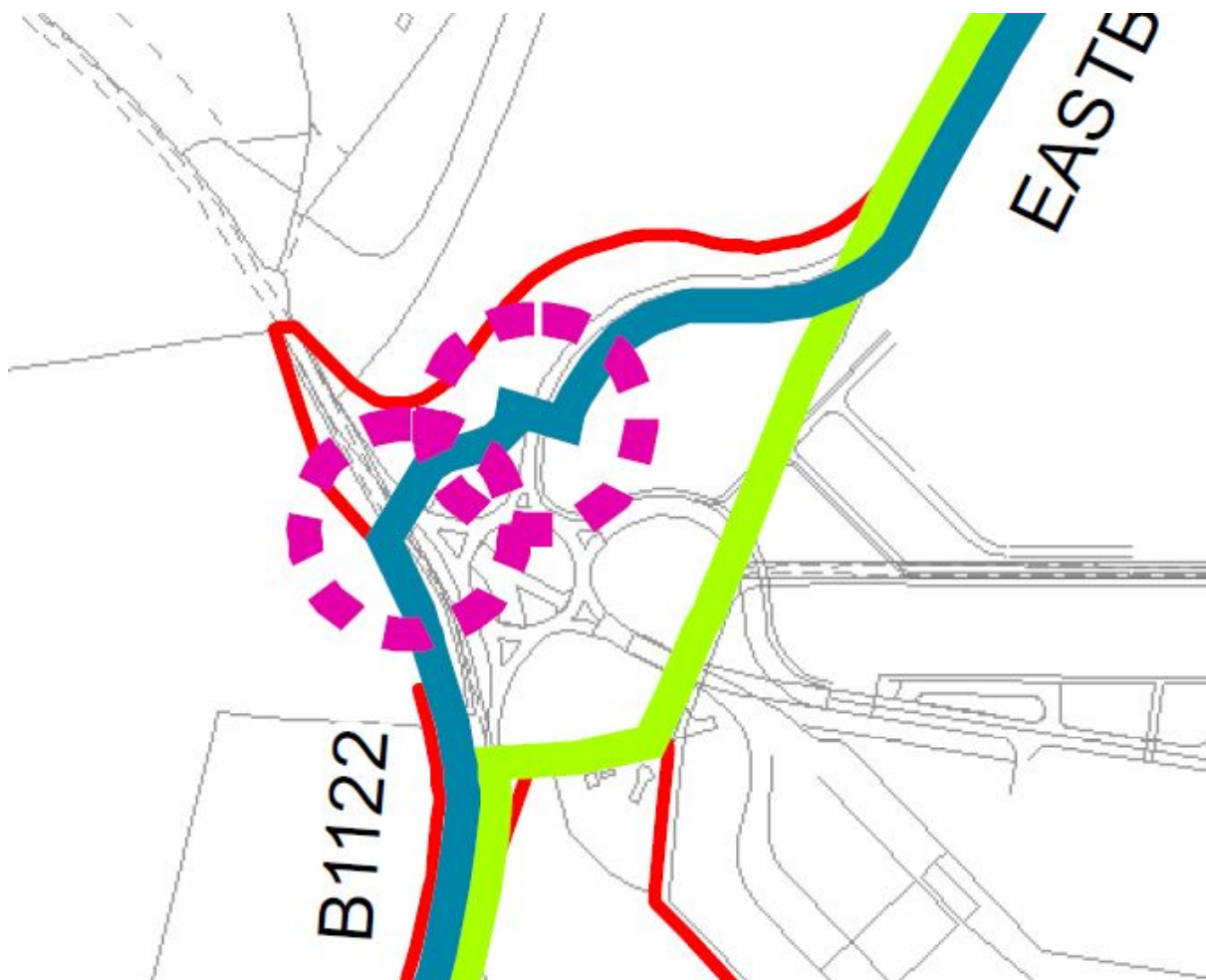
The above clip from Figure 15l.2 of the current Rights of Way and Access Strategy document clearly shows the current alignment of **BR19** (in pale blue) that needs to be closed during construction period. The underlying mapping detail shows the temporary vehicular entry to the construction site from Lover's Lane, and how the alignment of **BR19** will be crossed by the construction of the proposed railway, the internal access and haul roads within the construction site area and the proposed Sizewell Link Road. This is why the northern section of **BR19** will need to be closed before any of the proposed construction works can commence.

Section 1. 2. 20 states that the new off road bridleway would be constructed prior to the potential temporary closures of the Coast Path, temporary diversion of **BR19**, and closure of Bridleway 13, but says nothing about the construction and provision of the road and rail crossings. These are covered in Section 1. 1. 7 where it states that there will be further local short term temporary closures and diversions during, for example, construction of roads and other works.

This is particularly concerning where the alternative route for **BR19** will cross the construction of the Sizewell Link Road/Eastbridge Road roundabout on the B1122.

Temporary crossings for horse riders, cyclists and pedestrians during the proposed construction of this roundabout and junction are totally unacceptable. There will be movements of traffic, including heavy construction traffic, ground workers and associated plant and machinery. There will be safety barriers, flashing lights, and a high volume of noise. This construction location will not be a suitable thoroughfare for horse riders, or indeed cyclists and pedestrians.

It is therefore clear that while the quick win of the off road sections for the temporarily diverted northern section of **BR19** are achievable prior to the commencement of the proposed construction of the Sizewell C site, there will be no provision for safe crossing by members of the public at the road crossings, the proposed railway crossing and in particular the construction site of the Sizewell C Link Road/Eastbridge Road roundabout on the B1122.



The above clip from Figure 15l.2 of the current Rights of Way and Access Strategy document clearly shows the proposed roundabout, with the proposed Pegasus crossings to be constructed as a part development of the new road and roundabout.

In Session 4 of ISH 12 Mr Monde dealt with the question of timing of the construction of the Sizewell C Link Road (and thereby the construction of the Pegasus crossings for the alternative route for **BR19** at the Sizewell C Link Road/Eastbridge Road

roundabout on the B1122,) following the issue being raised by Mr Wilkinson that the western section of the Sizewell C Link Road should be completed before works on the main development site should be allowed to commence.

Mr John Rhodes for SZC responded that the consequence of providing the western section the Sizewell C Link Road first, which would include the construction of the roundabout, as a standalone project, would cause an unacceptable delay of at least two years to the delivery of urgent national infrastructure, and it was their intention to minimise the disruption and delay as far as possible.

Mr Philip Braeshaw for SZC then contradicted Mr Rhodes by stating that he understood that there was a commitment to provide a safe alternative for users of **BR19** as part of the construction and that the alternative route would be provided, including the Pegasus crossings, and this route would be in place before the closure of the northern section of **BR19** happens. This, he said, would be confirmed in writing.

Revealing this issue for **BR19** by searching through the **EN010012-002875 SZC** documents, and all the changes as they have been drafted, has shown up this contradiction between the aspiration for development and the practicalities and precise commitments of construction.

So is there another alternative route that could be used by horse riders instead of **BR19** or the proposed diversion route?

Returning to the latest Rights of Way and Access Strategy document, I note it is proposed that dismounting/mounting blocks for equestrians will be located on either side of the Beach Landing Facility. See sections 1. 2. 11/12/13.

While it is commonly accepted that horse riders use the dunes, foreshore and beach, there is no public right of way for horses in this location. **Public Footpath 21 Leiston cum Sizewell (FP21)** is located on the engineered dunes fronting the existing Sizewell B power station, then continues northwards towards the shingle of the natural sea defences fronting RSPB Minsmere, and to Public Footpath 15 Dunwich. Horse riders using the dunes at Sizewell along the frontage of the proposed development only go as far as the 'tank traps' that are located near where the permissive footpath route through Kenton Hills and Goose Hill Woods joins **FP21**, but then have to turn back as the soft shingle of the natural sea defence further north is totally unsuitable for horses. It must also be remembered that cyclists have a right to use **BR19** too, so this route is also unsuitable for cyclists, and cannot be considered as a suitable alternative route during the temporary closure of **BR19**.

In my submission [AS 333](#) I described horse riders using **BR19** as part of a circular route, via Sizewell beach, to **Bridleway 14 Dunwich**. This is achieved by riding along the beach not the dunes.

To use the beach riders need to be mindful of the tides, and the through route is only possible at the lowest astronomical tide level (spring low tides) when sand is revealed. There is about a one hour window of opportunity of passage either side of a spring low tide, so a tide timetable must be consulted before this route is

attempted. This route is only available for a few hours of a few days every lunar month therefore use of the beach below mean high water as an alternative route for the temporary diversion **BR19** while the off road cycle/bridleway is constructed is not feasible.

CONCLUSION: As a material issue the provision of a safe and certificated alternative north-south connectivity route that is suitable for horse riders, cyclists and pedestrians as a temporary diversion of well used **Bridleway 19 Leiston cum Sizewell** cannot be achieved before the commencement of any of the construction works, as required by **Development Consent Order EN010012-002875 SZC**.

Yours sincerely

Sylvia Ballard

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ISSUE SPECIFIC HEARING 12 – SESSION 3 Section 4 ii re: BRIDLEWAY 19 LEISTON CUM SIZEWELL

To the Examination Authority

Dear Mr Monde

EQUESTRIAN CROSSINGS AT THE SIZEWELL C LINK ROAD ROUNDABOUT

At ISH 12 – Session 3 Section 4 ii I raised the issue about the safety for horses regarding the design of the crossing at the Sizewell C Link Road/Eastbridge Road roundabout which, after construction, will take traffic from both the already busy B1122 and the substantial level of construction traffic using the proposed new Sizewell C Link Road.

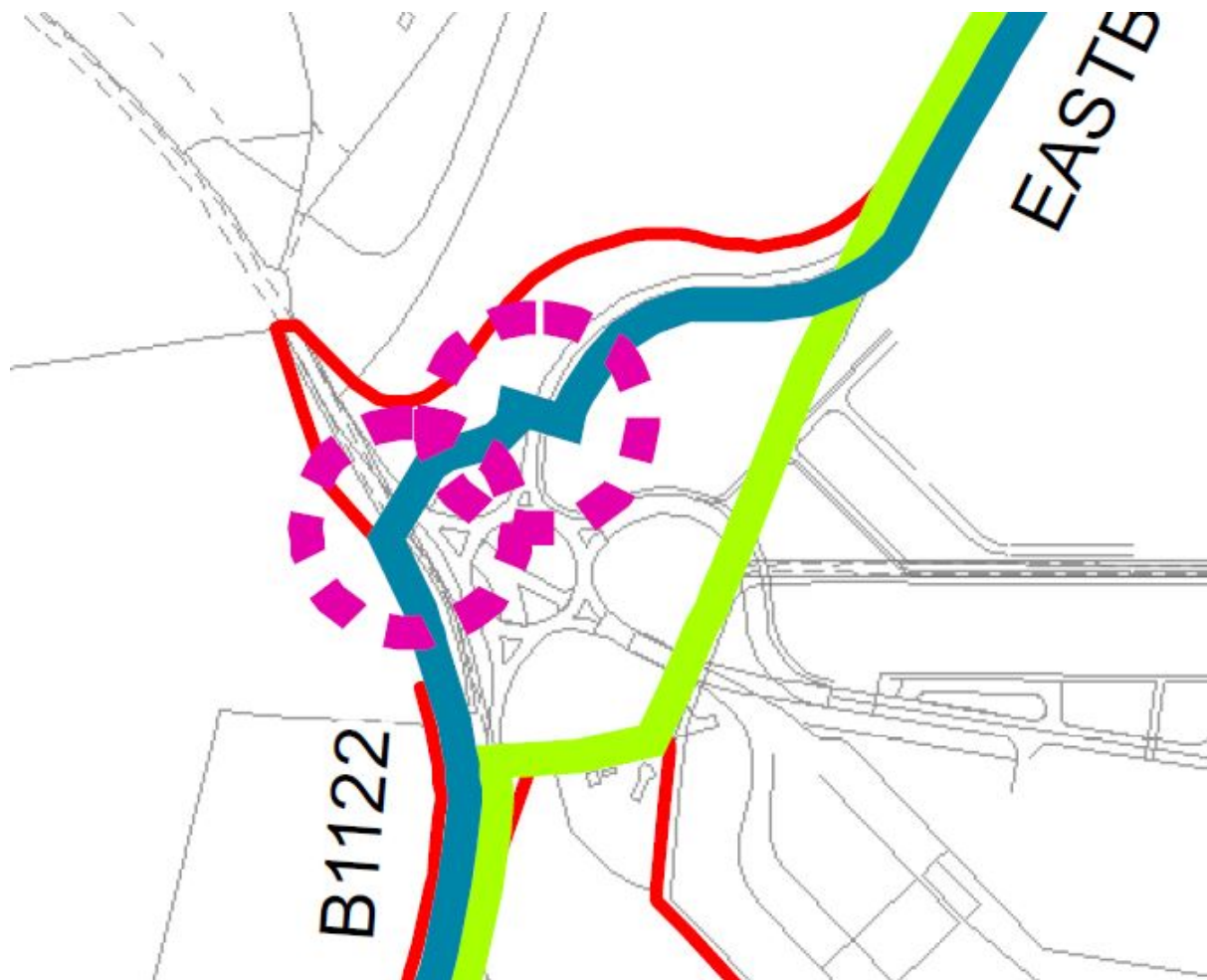
This proposed roundabout has five entry/exits which will be taking merged traffic to and from the proposed new Sizewell Link Road and the B1122. The proposed Pegasus crossings are to the north of the roundabout and there will be significant goods traffic including heavy plant movements in both directions on this busy intersection.

While this junction of the B1122 is not a dual carriageway, there will be traffic entering and exiting from the roundabout, possibly in two separate lanes in each direction, giving horse-riders up to four traffic lanes to cross. At times of heavy traffic flow horses may have to wait a significant amount of time while the traffic is controlled by the lights.

Horses do not have brakes, and will find using the double Pegasus crossing at this roundabout distressing due to proximity to the movement, noise and particularly the sound made by airbrakes of heavy goods vehicles and construction traffic suddenly held up by the crossing lights.

For horses accustomed to the current motorised vehicle and crossing free route of **BR19**, the proposed diversion route is far less commodious than the existing route, being considerably longer and riders coming northwards from Sandy Lane will

already have had to negotiate many unfamiliar crossings of roads and the proposed railway before encountering the Sizewell Link Road/Eastbridge Road roundabout.



The above clip from Figure 15l.2 of the current Rights of Way and Access Strategy document shows the design of the roundabout and the position of the proposed two Pegasus light controlled crossings

Any temporary crossings for horse riders, cyclists and pedestrians during the proposed construction of this roundabout and junction would be totally unacceptable. There will be movements of motor vehicles, including heavy construction traffic, ground workers and associated plant and machinery. There will be safety barriers, flashing lights, and a high volume of noise. This construction location will not be a suitable thoroughfare for horse riders, or indeed cyclists and pedestrians.

BR19 is currently the only recreational off-road route providing connectivity between the PROW network of Bridleways and Byways to the north and to the south of the development site and is very popular and well used. Section 1. 2. 17 of the current Rights of Way and Access Strategy document states the intention that the proposed diversion route onto a new off-road combined bridleway, cycleway and footpath is intended to carry not only the diverted users of **BR19**, but also cyclists using Sustrans route 42 and walkers using the Suffolk Coast Path, the Sandlings Walk and

the England Coast Path. The safety of the potential volume of non-motorised users of the crossings at the roundabout is therefore of paramount importance.

The British Horse Society, that has not been listed as a Consultee in the application process even though the diversion of **BR19** is a material consideration, advise in their Road Crossings advice leaflet that:

Trunk Roads and Dual Carriageways: At grade crossings of dual carriageways are difficult and sometimes impossible for many horses. Road designers or others involved may consider crossing easier because those crossing are only negotiating traffic from one direction at a time. However, unlike cyclists or pedestrians, equestrians may find it too risky to wait on a central reservation; particularly if there has already been a wait to cross the first carriageway and if waiting for longer than a minute, which is commonplace on many dual carriageways. The high noise level and strong air currents from passing vehicles can be distressing for horses and humans. On single carriageways traffic will commonly be held behind slower vehicles, creating gaps between vehicles long enough for equestrians to cross, except on roads where traffic is so dense it forms a continuous stream. On busy dual carriageways, gaps tend to occur only when a lorry is overtaking slowly, holding faster traffic behind it, and creating a gap ahead. This may be infrequent, resulting in continuous traffic and waits of several minutes for a gap. The preferred means of crossing a dual carriageway is by an underpass or overbridge. Ideally, the provision of underpasses where the road is on embankment and overbridges when it is in cutting would minimise visual impact and the length of ramps. Special factors which will have to be considered include high water table and high load routes, plus environmental impact of structures.

See [BHS ADVICE LEAFLETS](#) for details.

The intention stated in Section 1. 2. 23 of the current Rights of Way and Access Strategy document to make the new off-road route a definitive right of way also lends weight to the consideration of the design of the crossing into the future. An underpass would seem to be the best solution to provide a safe off-road route for all non-motorised users that would avoid a dangerous at grade crossing of this busy intersection.

However, concerns remain about the timing of potential temporary closure of **BR19**, the availability of the new off-road route, the various road, rail and roundabout crossings, and the possible conflict with the commencement of the construction period of the main Sizewell C site.

Section 1. 2. 23 of current Rights of Way and Access Strategy document describes the off-road bridleway route would allow for the temporary closure (for the minimum duration possible) and diversion of **BR19** during the construction stage.

This suggested temporary closure is contrary the requirements of **Development Consent Order EN010012-002875 SZC** and the suggested time span of a 'minimum duration' is too vague.

If a timespan of approximately two years from the commencement of the construction period is an indication of the 'minimum duration' needed for the

construction of the bridleway link at Lover's Lane near the Kenton Hills car park, then this is an unacceptable length of a potential 'temporary closure' of the well-used **BR19** until the alternative off-road route is completed.

CONCLUSION: If a way can be found to fulfil the requirements of the Development Consent Order, a safe grade separated design for non-motorised users must be considered for the Sizewell C Link Road/Eastbridge Road roundabout on the B1122.

Yours sincerely

Sylvia Ballard