



Together Against Sizewell C

C/o Wood Farm, Westward Ho, Leiston IP16 4HT

18th September 2023

To: East Suffolk Council (ESC) Planning

Cc Tom Daly for information

Cc Suffolk County Council Planning

DC/23/3361/DRR for Soil and Dust management for site establishment of early access road Sizewell C DCO Requirement 2

Preamble

TASC can find no evidence of any application to Suffolk County Council for what appears to be a 4 lane equivalent, 12 metres wide, 2.82kms long, tarmac covered highway from a (possibly unauthorised) entrance off Lovers Lane Leiston. This appears to be a material change from the current 10 metre tarmac entrance which was constructed following approval by ESC of DC/23/0722/DRR on 4th April 2023.

Objection

TASC strongly object to this application for what would be an enormous (and expensive) pre Final Investment Decision (FID) intrusion into the Suffolk Coast and Heaths AONB which could also impact the Sizewell Belts SSSI. TASC consider the proposed highway standard access road to be part of the main development, therefore not part of the preliminary works.

This current temporary access is not in the DCO approved position, nor has it got the DCO required 40mph speed limit or visibility splay. It is apparent that the existing Lovers Lane should have been realigned and an entirely new access constructed. We estimate the correct position of the access to be at least 50 metres nearer to the District Survey Lab. We believe the correct drawing for the off highway access is found at [PowerPoint Presentation \(planninginspectorate.gov.uk\)](#) ref. 100111

Note this is for a 10 metre wide access track. There are no drawings of onsite works, we assume the developer is reliant on approvals under the Rochdale envelope.

There is no record on SCC planning portal of any application for the temporary (current) access road nor any registered application to SCC for any new access. This appears to have been permitted under the previous Discharge application DC/23/2772/DRR_ to ESC which TASC consider has resulted in the highway access being positioned in a place that is not consistent with plans approved in the DCO. TASC concerns are that a dubious practice is hiding major works in a discharge of requirement for dust and soil.

We would also like to advise that when we made direct enquiries to SZC Co regarding these early works and another site at LEEIE, SZC supplied an incorrect out of date link to us. This is totally

unacceptable behaviour by the developer. Even so, there is no detail of the currently proposed highway within the links provided by SZC Co or the later version of plans we discovered ourselves on PINS website.

TASC would like to draw your attention to related information in two DCO documents:-

1. On Page 42 of '6.3 Revision: 1.0 Applicable Regulation: Regulation 5(2)(a) PINS Reference Number: EN010012 Volume 2 Main Development Site Chapter 3 Description of Construction, May 2020' para 3.4.196 states *"HGVs would travel along Lover's Lane to access the secondary entrance to the temporary construction area. **Prior to completion of the SSSI crossing**, HGVs would access the main platform along Sizewell Gap via the existing Sizewell A and B access road."* In TASC's opinion, this links this access road directly to the construction of the SSSI Crossing so would be required for the actual construction activities rather than to enable the preliminary works to be undertaken. Therefore, this tarmac access road should not be allowed as a preliminary work.
2. In '6.3/ 10.3 Book 6 Revision: 6.0 Book 10 Revision: Applicable Regulation: 1.0 Regulation 5(2)(a) PINS Reference Number: EN010012 Volume 2 Main Development Site Chapter 3 Description of Construction Appendix 3D of the Environment Statement: Construction Method Statement - Clean Version, October 2021', on page 43 in the section headed 'Temporary construction area: Vehicular accesses onto the B1122 and Lover's Lane' it states in para 3.4.35 *"The TCA will be accessed principally via a new roundabout to be located on the existing B1122, approximately at the site of the existing junction with Eastbridge Road. All workers and most construction materials travelling by road must access the temporary construction area via this roundabout."* and then goes on to state in para 3.4.38 *"**A secondary vehicular access road must be provided to connect the temporary construction area to LEEIE via Lover's Lane. This will be by means of a new priority junction on the northern side of Lover's Lane, a short distance west of Kenton Hills car park. This is required to facilitate the early delivery of materials into the main development site from LEEIE by HGV, generally before the roundabout is complete and after a SSSI crossing has been established. This access must also serve as an emergency access point in the event of an obstruction at the main development site entrance. Some permanent realignment to the existing highway will be required to ensure safe operation of the junction.**"* As with the document referred to in para number 1. above, this clearly establishes, the access road as needed for the SSSI Crossing so should not be considered as part of the 'preliminary works', it being part of the main construction activities.

It appears that the developer has no proper DCO approved drawing of the currently proposed road and access. Also, there appears to be no evidence that this is an approved route or that this route across the AONB and close to the Sizewell Belts SSSI, has been properly assessed for environmental impact. It may be that this is a material change to the DCO.

In view of the lack of proper drawings/mapping we respectfully suggest that the developer should be required to apply for a formal consent for access to the highway through SCC or PINS before reapplying to discharge construction of this access road.

M Taylor, for and on behalf of TASC