Abnormal Indivisible Load Access Summary Appendix E3

Having studied this document with regards to the transport arrangements I offer the following comments:-

The four 116tonne transformer units (7.4m Length, 3.0m width and 4.4m Height) will arrived at either Lowestoft or Ipswich docks, a third point of arrival, Felixstowe, has been mentioned verbally, but it can be assumed that the transportation from Felixstowe and Ipswich will be the same once the loads leave the A14 in Suffolk.

The preferred route is from Lowestoft, however the obvious route (A47 & A140) cannot be undertaken due to the railway bridge on the A140 at Dunstan having a 44 tonne permanent weight restriction. That bridge cannot be overbridged due to its length, curvature and inclination. This will require the loads to come A47-A12-A1145-A146-A143 and then on to the A140 at Scole before heading North along the Long Stratton bypass from where they will travel south on Norwich Road to turn right into Flowerpot Lane. This is stated to 'probably be' the preferred route for National Highways.

Travel from Felixstowe or Ipswich would require overbridging a structure at Brockford Street that cannot be avoided by re-routing. The onward route would then be North on the A140 to Scole and then the same route as shown above. This is apparently not the preferred route for Norfolk & Suffolk Roads Policing who will be escorting the loads.

Wynns provide two options for transporters to carry the transformers.
Appendix E3 Appendix 3.

1. A 16 axle girder frame trailer: this has to be utilised in a 'pulling -pushing' configuration with dual tractor units, it cannot be pulled around tight corners - it relies on the rear tractor unit being used in a pushing/steering action. The trailer can be configured depending on its load weight in an infinitesimal number of ways both in length and width. The statistics quoted (rounded) are overall length 57m Overall, width 4.1m, Height 4.4m, gross weight 202.8 tonne. It will impose a loading of 3.17 tonnes per wheel on the road surface. No statement has been made to the road structures being able to accept these loadings.

2. A 5 axle bed 5 axle draw bar trailer. This can be used with a single drawbar tractor unit and has its distinct advantages. It is shorter at 36m length and its gross weight is less at 162 tonne. It also exerts less loading on the road surface of 2.03 tonne per wheel as it has a greater number of wheels in contact with the road surface.

The difficulty faced is that the shorter 5 axle unit requires a turning circle radius of 23m (75ft) while the larger and longer sixteen axle girder frame only requires a turning circle radius of 18.5m (60ft). Therefore to negotiate the tight turns along the route from the A140 to the site, the sixteen axle larger unit would logically be the preferred option.

It is important to note that Wynns have only carried out a desktop assessment of the routes. They clearly state that a dry-run would be needed to determine the viability of any route.

There is no indication that FIELD have requested such an assessment be carried out. No conclusive evidence is available to confirm the viability of any planned routes.

The major problems will start from the moment the loads leave the A140 and enter Flowerpot Lane.

Stratton Road from Flowerpot Lane to Hall Lane Wacton is a winding and narrow road and would appear almost un-negotiable to a vehicle up to 58m in length and 4.3m overall width without causing considerable damage to roadside structures and embankments.

There are 34 locations between the A140 and the site where both electric and/or communications cables pass over the carriageway. At many points these consist of multiple single cables (up to 12). This cannot be assessed in a desktop survey. One assumes that any cables that will impeded the progress of the loads will either require manual lifting or disconnection and temporary removal at huge inconvenience to residents.

There is no assessment provided by UK Power Networks, Openreach, Gigaclear or County Broadband who own this infrastructure.

There are a large number of trees that would need to have limbs cut and many of these are on private land and possibly covered by TPO's.

It is stated that the turn from Market Lane to Carr lane can be negotiated because the extra land required to provide a turning radius is 'within the ownership of the landowner'.

However, little is being said about the Hall Lane/Market Lane turn (SPA03) said 'not to be negotiable'. No alternative suggestion is made but seemingly this land could be made available, however you cannot drive a 202 tonne load across a field, some form of temporary structure designed to accept such loadings would be necessary.

Of course, once the transformers are unloaded the transporters will have to make their way under escort away from the site. Whilst they will be unburdened they will still be the same overall length and width.

There is no other access to the site from any other direction mainly due to a number of extremely tight turns and traversing level crossings carrying 25Kv overhead power lines which possibly have too little clearance for the loads to pass under without risking high voltage arcing.

Chapter E Transport

This chapter contains so much contradiction and misleading information that it reads more like a script for an episode of 'Only Fools and Horses'.

Assessment Methodology and Significance Criteria

Consultation: (Pg 6)

'No formal consultation specifically related to transport has been undertaken to date'

The statement shows the total disregard for public safety in respect of one of the most impacting aspects of the whole project.

Major Hazards and Accidents.

E5.10 'It is unlikely that any major accidents or hazards will be generated or occur due to the proposed development. Road traffic accidents are possible involving vehicles during both the operational and construction phases however, the risk is low'

E5.11 'A review of the existing accident data local to the site over a period of the last three years has not identified any accident patterns or clusters that may relate to unsafe junctions or road layouts'.

These are small narrow local roads used almost exclusively by locals who are highly conversant with the local area and topography. With the exception of a very small number of HGV movements mainly associated with farm collections and deliveries, traffic is mainly made up of private cars in very low volume. Accidents are only reported to the Department of Transport under the STATS19 system if they are recorded by the police for any reason. By that methodology Road Traffic Accidents not involving personal injury do not appear in any accident statistics unless the reporting officer deems the incident major or a Road Traffic Offence has been committed or is suspected.

How can any statement be made that introducing 51,169 extra vehicle movements on these roads many involving HGV's driven by individuals unfamiliar with the local area and in adverse conditions or the hours of darkness will only present a 'low risk'. This is totally unquantified 'finger in the air' guess work finding the question to a known answer.

E5.28 Hazardous/Large Loads

E5.28 Acknowledges the delivery to the site of abnormal loads but fails to make any reference to the conveyance of large quantities of Lithium-ion batteries.

A report by Frazer Nash consultancy included input and guidance from the

DEPARTMENT FOR ENERGY AND NET ZERO, KENT FIRE & RESCUE SERVICE AND BY A STRANGE COINCIDENCE FIELD.

This report states:

During transportation there is potential that BESS components will not have the same level of protection as they would once installed, for example from fire monitoring and suppression systems. It may be necessary to implement additional protections to mitigate this risk, such as disconnecting or separating components, limiting their charge level, or installing additional sensors that remain active during transport.

It is noted that there may be the need to charge batteries to a certain state of charge (e.g. between 20-50%) to avoid excess discharge impacting battery health. This and balancing charge across batteries can help with early installation and commissioning. Standard IEC 62281 describes various cell tests, packaging and handling considerations to support safe transport.

UN Transport Regulations classifies lithium-based batteries as "Class 9 - miscellaneous dangerous substances and articles" *(with various sub-classifications based on the battery type and how it is packaged).* ***These regulations will apply to the transport of grid-scale BESS, and as such they should be treated as dangerous goods.*** *Additional guidance on moving potentially dangerous goods and equipment is provided by the HSE [18] and Department for Transport [19].*

No mention is made that any consideration or risk assessment has been undertaken in respect of this part of the construction phase or adherence to this report of which FIELD themselves have been consultees. There is no indication that any measures will be put in place to safely convey Class 9 Hazardous materials on narrow public roads in close proximity to homes.

During Construction

5.14: During the construction stage a total of 51,169 vehicle movements will occur. *'2,628 will be involved in the movement of topsoil and will only be seen on Market Lane'.*

How will they get to and from Market Lane to carry out their duties, unless some form of teleportation is involved they must use other roads to get to the site.

An alternative would be to have these vehicles stored on site for the duration of construction, surely in that case the site would then become and have to comply with the requirements of becoming an Operating Centre.

E5.26 There will be an anticipated increase in traffic flows of 96 daily two-way vehicle movements during the construction phase. 'It is unlikely the increase will result in an increased number of collisions.

If you increase traffic flow along narrow country lanes with high banking both sides, it is sheer folly to imply 'no increase will occur' especially as many journeys will occur in the winter months along unlit roads that will become icy and possibly snow covered.

Pedestrian & Cycle Amenity.
E5.33: 'Considering the small increase in vehicle flows and the positive impact the footpath will provide [the permissive footpath along three sides of the site] it is anticipated the development will have a minor beneficial impact on pedestrian and cycle amenity during the operational phase'

How can this be quantified?

Strangely this document commits more words looking into the transport arrangements for the decommissioning process in 2070 than it does in looking at what is relevant today.

BULLET POINTS

Appendix E3; No evidence the dry-run assessment of the prescribed AIL required by Wynns Transport has been requested or carried out. Only a desktop assessment has been done.

Route has not been assessed by UK Power Networks, Openreach, Gigaclear or County Broadband to assess overhead cabling along the route Long Stratton – Great Moulton

Trees along route will require limbs removed, many are on private land with possible TPO's but no mention in application.

No formal transport consultation has been undertaken.

Major accidents and hazards assessment is made without any quantified or relevant statistics.

States that an additional 51,169 vehicle movements on narrow country roads is unlikely to increase the number of vehicle collisions despite vehicles and drivers alien to the environment will be utilised.

Total failure to acknowledge the Frazer Nash report (to which FIELD and the Government were consultees) on the dangers of transporting Class 9 Dangerous Goods (Lithium -ion BESS batteries) by road.

Declares 2628 vehicle movements will only be seen on Market Lane without explaining how they will get to that location or how and where they will be stored during downtime.