

24 June 2021

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By email: <u>SizewellC@planninginspectorate.gov.uk</u>

Dear Sirs

NNB Generation Company (SZC) Limited Application for an Order Granting Development Consent for The Sizewell C Project (EN010012)

Deadline 3 Submission on behalf of East Anglia ONE North Limited

1. Comments on Responses to the ExA's Written Questions (ExQ1)

We refer to the Planning Inspectorate's Rule 8(3) letter dated 18 June 2021 (the "Rule 8 Letter"). In accordance with the deadlines at Annex A of the Rule 8 Letter, we enclose Comments on Responses to the ExA's Written Questions (ExQ1) on behalf of East Anglia ONE North Limited, a subsidiary of ScottishPower Renewables (UK) Limited (SPR) in response to the 24 June 2021 Deadline within Annex A of this Letter:

2. Comments on Applicant's first revised draft DCO

2.1 Protective Provisions

East Anglia ONE North Limited are seeking Protective Provisions within the Applicant's DCO to ensure that the construction, operation and maintenance of the Sizewell C Project does not adversely impact the East Anglia ONE North offshore wind farm project. East Anglia ONE North Limited will progress this matter through direct engagement with the Applicant with a view to agreed protective provisions for the benefit of East Anglia ONE North being included within the next version of the draft DCO to be submitted at Deadline 5.

2.2 Draft DCO & Associated Documentation

East Anglia ONE North Limited acknowledges the submission of the revised draft DCO and associated documentation by the Applicant at Deadline 2 including:

- REP2-054 8.7 Construction Traffic Management Plan Revision 2.0
- REP2-053 8.6 Traffic Incident Management Plan Revision 2.0
- REP2-045 8.5 Consolidated Transport Assessment Revision 3.0 and associated appendices.

East Anglia ONE North Limited will continue to liaise with Sizewell C Project representatives in respect of these documents and in order to seek to progress the matters

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outlined in East Anglia ONE North Limited's Written Representation submitted at Deadline 2 (REP2-260).

3. Notification of Issue Specific Hearings

East Anglia ONE North Limited acknowledges the Notification of Issue Specific Hearings (ISH) by the Examining Authority on the 8th June 2021 and confirms that they request to attend the following ISHs:

- ISH2 Traffic and Transport 7th July 2021
- ISH3 Traffic and Transport 8th July 2021

Attendance by East Anglia ONE North Limited is subject to consideration of the detailed agendas once these are made available. East Anglia ONE North Limited confirms that they will respond in writing to any questions or Hearing Action Points that are raised for East Anglia ONE North's attention as part of the written process of examination.

Pours faithfully

Richard M

Richard Morris, Senior Project Manager **East Anglia ONE North Limited**

Enclosures





ANNEX A

Table 1: Comments on Responses to the ExA's Written Questions (ExQ1) Published on 21 April 2021



East Anglia ONE North and East Anglia TWO Offshore Windfarms

East Anglia ONE North Limited and East Anglia TWO Limited's comments on the responses to ExA's WQs for SZC Examination

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Date: 24th June 2021 Revision: Version 01

Author: Royal HaskoningDHV



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
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1 Introduction

- 1. This document has been submitted by East Anglia ONE North Limited and East Anglia TWO Limited to the Sizewell C Project's Development Consent Order (DCO) examination.
- 2. This document presents East Anglia ONE North Limited and East Anglia TWO Limited's comments on the responses to the Examination Authority's (ExA's) written questions (WQs) as part of the Sizewell C (SZC) examination for Deadline 3.



2 East Anglia ONE North Limited and East Anglia TWO Limited's Comments on the Responses to the ExA's WQs for SZC Examination for Deadline 3

ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
Cumulativ	e effects with	other plans, projects an	d programmes	
ExQ1 PART 3 OF 6 Cu.1.0	The Applicant	Cumulative assessment in EIA and HRA 'in-combination' assessment Natural England (NE) [RR- 0878] does not consider that a suitably robust assessment has been undertaken within the HRA of impacts from different aspects of the project, or of 'in combination' impacts between other projects which may impact on the same internationally designated sites and features. In particular,	(i) SZC Co. disagrees with Natural England's position. In relation to the combined impacts from different aspects of the project, to supplement the assessment reported in the Shadow HRA Report [APP-145 to APP-149], further assessment of potential effects from the Sizewell C Project was reported in Appendix 1A to the Shadow HRA Report Addendum [AS-174]. That assessment provides supplementary analysis of the effects on qualifying features of each European site that could arise due to interaction between the various effect pathways (screening categories) listed in Table 5.1 of the Shadow HRA Report [APP-145]. These effects are referred to as 'inter-pathway effects' in Appendix 1A to the Shadow HRA Report Addendum [AS-174]. A draft version of this supplementary assessment was shared with	 (i) To clarify the statement "Since the Shadow HRA Report [APP-145 to APP-149] was prepared, East Anglia ONE North, East Anglia TWO and East Anglia THREE have been combined to form the East Anglia HUB", the combining of the projects relates to the procurement process in order to achieve the most efficient procurement and delivery of the East Anglia ONE North, East Anglia TWO and East Anglia THREE projects. The East Anglia ONE North, East Anglia TWO and East Anglia THREE projects however remain separate projects proposed by separate legal entities. See (ii) for further commentary on SZC's response. (ii) East Anglia ONE North Limited and East Anglia TWO Limited note that there is no preference for sequential or parallel delivery of



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		the cabling for East Anglia ONE North (EA1N) and East Anglia TWO (EA2) would come ashore and be routed through this part of the AONB close to the Sizewell C construction site. (i) Please provide an update on the latest position in relation to discussions with NE on this topic and indicate any outstanding points of disagreement for this element of the HRA process; (ii) Please provide an update on the part of the Sizewell project's nine to twelve years construction phase that would be likely to coincide with the EA1 North and EA2 cable route's construction?	Natural England (and East Suffolk Council, the Royal Society for the Protection of Birds, Marine Management Organisation, the Environment Agency, Suffolk Wildlife Trust and Suffolk County Council) in advance of a meeting held on 24 November 2020. With respect to in-combination effects with other plans and projects, Appendix C to the Shadow HRA Report [APP-145 to APP-149] lists those plans and projects considered in the Shadow HRA process, which includes the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) projects. In addition to the above matter, with regard to in combination effects with other plans and projects, Natural England [RR-0878] specifically advised the preparation of a Site Integrity Plan (SIP) for the Southern North Sea Special Area of Conservation (SAC). A SIP was provided as Appendix 9A to the Shadow HRA Report Addendum [AS-178]. Since the Shadow HRA Report [APP-145 to APP-149] was prepared, East Anglia ONE North, East Anglia TWO and East Anglia THREE have been combined to form the East Anglia HUB. The SIP (Appendix 9A to the Shadow HRA Report Addendum [AS-178] includes assessment of incombination effects with the East Anglia HUB, reflecting the new construction programmes (see below).	the East Anglia ONE North and East Anglia TWO projects. The East Anglia ONE North and East Anglia TWO DCO Applications have assessed both construction scenarios and DCO consent is sought to allow for both construction scenarios. It is noted that East Anglia ONE North Limited and East Anglia TWO Limited have made a commitment that should both projects be consented and proceed on a sequential basis, that the ducting for the second (later) project will be laid in parallel with the first project. East Anglia ONE North Limited and East Anglia TWO Limited also highlight the Outline SPA Crossing Method Statement that was submitted to the East Anglia ONE North and East Anglia TWO examinations as this presents further detail (including seasonal restrictions) on the onshore cable route works within the SPA. Also see the response to ExQ1 PART 3 OF 6 Cu.1.9 (i) below.



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			(ii) As set out within Appendix 13A of this chapter, the new construction programmes, as detailed on the new 'East Anglia Hub' website, state that offshore construction of all three schemes will commence in 2023, on shore works will commence in 2024 and all three schemes will be operational by 2026. Information provided by Scottish Power Renewables states that construction is likely to be sequential, with parallel construction being the worst-case scenario. An updated construction programme for the Sizewell C Project is provided within the Implementation Plan (Doc Ref. 8.4I(A)) submitted at Deadline 2. The anticipated peak early year of construction remains 2023 and peak year of construction at the main development site is in 2028, with Sizewell C due to become fully operational by 2034, as set out in the ES.	
ExQ1 PART 3 OF 6 Cu.1.7	The Applicant, EA1N	Cumulative effects with other plans, projects and programmes EA1N [RR-0340] indicates that its representatives have engaged proactively with Sizewell C representatives to better understand the scope and impact of	SZC response - Volume 1 SZC Co. continue to engage with Scottish Power Renewables (SPR) to ensure coordination between East Anglia One North (EA1N) and East Anglia Two (EA2) and Sizewell C Project. See response to TT.1.62 within Part 6 which describes recent discussions between SZC Co. and SPR in relation to consistency between traffic models. A technical note (refer to Appendix 24B) has been produced summarising the differences in the SPR Preliminary Environmental Information Report (PEIR) and ES	East Anglia ONE North Limited and East Anglia TWO Limited's transport consultants (Royal Haskoning DHV) have engaged with SZC Co. transport consultants (WSP) to clarify the traffic data that informed the former's DCO application. Royal HaskoningDHV have reviewed Appendix 24B Technical Note 1 Comparison of Scottish Power Renewables Development Traffic Assumptions (REP2-050) and can confirm the traffic data presented is a correct disaggregation of the traffic demand presented in the East Anglia ONE North



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		the proposed Sizewell C Project and its potential cumulative and in-combination effects, in particular on transport related matters. Please confirm that such discussions are ongoing and indicate whether any further information is available at this stage in relation to potential cumulative and incombination effects of the projects with particular regard to transport- related matters.	traffic inputs. A Statement of Common Ground (SoCG) has also been developed between SZC Co. and SPR (Doc Ref. 9.10.28), setting out a commitment to engage in relation to coordination of highway mitigation proposals and programmes (see response to TT.1.63 in Part 6 for further information).	and East Anglia TWO DCO applications. Discussions on traffic distribution remain ongoing with SZC Co. Contrary to that stated within Technical Note 1, Royal HaskoningDHV have not commented on or agreed the significance of the changes in East Anglia ONE North and East Anglia TWO traffic from PEIR to DCO application (and the influence on the SZC Transport Model) as it is considered this is a matter for SZC Co. and the relevant authorities to determine.
ExQ1 PART 3 OF 6 Cu.1.8	The Applicant, EA1N, EA2	Cumulative effects with other plans, projects and programmes EA1N [RR-0340] and EA2 [RR-0341] explain that the Order limits for the EA1N Project and the Sizewell C Project overlap in three areas of the public highway,	SZC response - Volume 1 i, ii, iii) See response to TT.1.63 in Part 6 which discusses the coordination of highway mitigation proposed by SZC Co. and SPR for EA1N and EA2. A commitment to regular engagement during design and construction phases is set out in the SoCG between SZC Co. and SPR (Doc Ref. 9.10.28). SZC Co. propose to establish clear communications protocols between all three parties, which will be defined in the terms of reference of the Transport Review Group	East Anglia ONE North Limited and East Anglia TWO Limited are not a member of SZC Co's Transport Review Group and cannot comment on its scope or function. Notwithstanding this, East Anglia ONE North Limited and East Anglia TWO Limited have ongoing engagement with SZC Co. in relation to the respective parties' DCO applications. Deadline 2 Submission - 9.10.28 Initial Statement of Common Ground - East Anglia



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		namely: Sizewell Gap (close to the Junction of Sizewell Gap/King George's Avenue); the junction of A12/A1094 (Friday Street); and the junction of A1094/A1069 (Snape Road). (i) Please indicate whether any progress has been made in relation to opportunities for coordinating works in these areas and how this would be secured by the DCO(s). (ii) If not, what are the perceived obstacles to any such co- ordination? (iii) Explain the way in which the various works for these schemes in these locations could conflict?	(TRG). iv) The SPR EA1N and EA2 Works interact with Sizewell Gap at Work Nos. 10, 11 and 15. The EA1N and EA2 draft DCO (Schedule 9) sets out the purpose for which temporary possession may be taken at these Works (e.g. construction and carrying out of authorised project, vegetation clearance, access for carrying out the project). The SoCG between SZC Co. and SPR (Doc Ref. 9.10.28) notes that these works do not materially conflict with the construction of the Sizewell C Project. The draft DCO (Doc Ref. 3.1(C)) includes protective provisions which adequately protect SZC Co.'s interests with regard to interactions on Sizewell Gap.	One North and Two - Revision 1.0 (REP2-092) contains the following 'in principle' agreement: The Applicant and EA1/EA1N recognise that all projects involve works at Friday Street, Sizewell Gap and Snape Road and will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicant and EA1/EA1N as well as the wider community that works at Work No. 35 [A1094/A1069] be coordinated as far as reasonably practicable. East Anglia ONE North Limited and East Anglia TWO Limited are seeking protective provisions and side agreement with SZC Co. to ensure the protection of East Anglia ONE North Limited and East Anglia TWO Limited's interests as a result of the Sizewell C Project.



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Of ExQ1 PART 3 OF 6 Cu.1.9	The Applicant, EA1N, EA2	Cumulative effects with other plans, projects and programmes ES Volume 10 Projectwide, Cumulative and Transboundary Effects [APP-578], Chapter 4, paragraph 4.4.13, indicates that the construction of EA1N and EA2 could overlap with the construction of the Sizewell C Project. Paragraph 4.14, states that the 'concurrent build' traffic flows have been used, derived from the preliminary environmental information for the EA2 development. (i) Please indicate whether any further information is available at this stage as to the likely timing and duration of the overlap should all these projects be approved. (ii) Please comment on	(i) As set out within Appendix 13A of this chapter, the new construction programmes for EA1N, EA2 and EA3, as detailed on the new 'East Anglia Hub' website, state that offshore construction of all three schemes will commence in 2023, on shore works will commence in 2024 and all three schemes will be operational by 2026. Information provided by SPR states that construction is likely to be sequential, with parallel construction being the worst-case scenario. An updated construction programme for the Sizewell C Project is provided within the Implementation Plan (Doc Ref. 8.4I(A)) submitted at Deadline 2. The anticipated peak early year of construction remains 2023 and peak year of construction at the main development site is in 2028, with Sizewell C due to become fully operational by 2034, as set out in the ES. As explained within Volume 10, Chapter 4 of the ES [APP-578], the peak SPR construction traffic flows were considered as part of the peak early year (2023) assessment of Sizewell C construction within the ES. Furthermore, although the proposed timeline for concurrent construction shows the SPR	(i) The temporal overlap of traffic demand between East Anglia ONE North and East Anglia TWO and Sizewell C is clarified in Deadline 6 Submission - ExA.AS-6.D6.V2 EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (EA2/EA1N REP6-043) of the East Anglia ONE North and East Anglia TWO examination). The note examines SZC Transport Assessment Addendum (AS-266) and identifies the following worst case cumulative impact assessment (CIA) scenarios: • CIA Scenario A –SZC early years construction traffic + East Anglia ONE North and East Anglia TWO peak construction traffic, assuming a 2023 reference year; and • CIA Scenario B – SZC peak construction traffic (main development sites) + East Anglia ONE North and East Anglia TWO peak construction traffic, assuming a 2028 reference year.



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		the reliability of the ES assessment given that it has utilised preliminary environmental information and indicate whether this has now been superseded?	schemes to be completed before the Sizewell C peak construction phase, if the construction programme were to be delayed the concurrent build could still be underway by Sizewell C peak construction phase, therefore the SPR 'concurrent build' traffic flows were also assessed in the Sizewell C 2028 peak construction 'cumulative' scenario. The SPR schemes would be completed by the Sizewell C operational stage. This remains robust and valid. (ii) See response to question TT.1.62 within Part 6 which describes recent engagement between SZC Co. and SPR to check on the validity of the SZC Co. assessment using the latest traffic flows from the EA1N and EA2 Environmental Statements. A note has been produced to summarise the differences in the SPR PEIR and ES traffic inputs (refer to Appendix 24B). The flow differences are small. The conclusion of that review is that there would be no material impact on the SZC Co. environmental assessment, if the updated SPR flows were used. It is also noted that due to the proposed timings and location of the onshore elements of EA3, it is not	(ii) Please refer to comments on responses to ExQ1 PART 3 OF 6 Cu.1.7.



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			considered that this would have cumulative transport	
ExQ1 PART 3 OF 6 Cu.1.11	The Applicant, EA1N, EA2, SCC	Cumulative effects with other plans, projects and programmes ES Volume 10 Projectwide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes [APP-578], paragraph 4.4.53, explains that the cumulative assessment for Sizewell C with EA1N	With regards to the assessment of EA1N and EA2, the assumptions are agreed and considered to be acceptable by the Council. For clarity, the Applicant has recently submitted an updated technical note to the Council (see TT.1.62) highlighting that there are some minor differences between the EA1N and EA2 flows assessed in their DCOs and in the Sizewell C DCO; however, these are considered to be minor and highly unlikely to materially impact any conclusions. The assessment here relates to the cumulative impact for the implementation of EA1N, EA2 and SZC. It does not take into account the possible construction of other energy projects in the vicinity.	Please refer to comments on responses to ExQ1 PART 3 OF 6 Cu.1.7 and ExQ1 PART 3 OF 6 Cu.1.9.



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		and EA2 is based on certain worst case assumptions. Please indicate whether those assumptions are agreed between all parties and that they comprise a complete list of potential 'worst case' factors?	SZC response - Volume 1 See response to question TT.1.62 within Part 6 which describes recent engagement between SZC Co. and SPR to check on the validity of the SZC Co. assessment using the latest traffic flows from the EA1N and EA2 Environmental Statements. A note has been produced to summarise the differences in the SPR PEIR and ES traffic inputs (refer to Appendix 24B). The flow differences are small. The conclusion of that review is that there would be no material impact on the SZC Co. environmental assessment, if the updated SPR flows were used. Furthermore, SPR flows were previously accounted for within the 2023 early years peak assessment year. With the revised programme for East Anglia Hub, the 2023 assessment year remains correct.	
ExQ1 PART 3 OF 6 Cu.1.13	The Applicant, EA1N	Cumulative effects with other plans, projects and programmes EA1N [RR-0340] in relation to offshore matters notes that whilst the Sizewell C Project's Work Nos. 2B, 2D and 2F fall outside the EA1N Order limits, there remains an overlap in	SZC response - Volume 1 The EA2/EA1N Order limits are located 152m from Work No. 2F and an indicative 500m working width area is required between the EA2/EA1N Projects Order limits and the location of offshore export cables. There is a minimum indicative separation distance of 652m between the Sizewell C cooling water intakes at Work Nos.2B, 2D and 2F. and the nearest potential location of the EA2/EA1N offshore export cables. The construction, operation and decommissioning of the EA2/EA1N projects and the Sizewell C project can be undertaken without unreasonable hinderance. EA2,	The draft DCOs for East Anglia ONE North and East Anglia TWO include protective provisions in favour of SZC and the parties are currently negotiating a side agreement on this matter also. East Anglia ONE North Limited and East Anglia TWO Limited are seeking protective provisions for their benefit to be included within the SZC DCO and also require a side agreement to be entered into during the SZC examination in order to protect their interests.



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		the Order limits. The company expresses concern that it must not be hindered from undertaking the necessary works for the EA1N Project as a result of the Sizewell C Project works at these locations. Please indicate the form of assurance sought in this respect and whether this has been provided to the satisfaction of EA1N?	EA1N and SZC Co. will keep each other informed as to the precise siting of their respective infrastructure during detailed design and will work to ensure that the EA2 and EA1N and the Sizewell C infrastructure can be constructed, operated and decommissioned without unreasonable hinderance. A Statement of Common Ground (SoCG) for the EA2/EA1N Projects (Doc Ref. 9.10.28) has been developed on that basis.	
ExQ1 PART 3 OF 6 Cu.1.22	The Applicant	Cumulative effects with other plans, projects and programmes SCC [RR-1174] considers that the full cumulative impacts of the existing and potential future projects in the East Suffolk area have not been adequately assessed. (i) Please indicate whether any further	(i) For the construction of the Sizewell C Project the delivery of highway mitigation schemes will be undertaken in two distinct phases: • Design Phase • Construction Phase Both phases will be developed to reduce disruption during construction and to provide the required access to other developments surrounding Sizewell C. The preliminary design stage has taken cognisance of the potential disruption to road users during the construction phase.	Please refer to comments on responses to ExQ1 PART 3 OF 6 Cu.1.8. It should be noted that through discussions with SCC, East Anglia ONE North Limited and East Anglia TWO Limited have agreed to deliver specific mitigation measures proportionate to their contribution to significant cumulative transport effects and this has been secured under the East Anglia ONE North and East Anglia TWO DCOs.



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		information has come to light on the schemes considered by the ES and other schemes coming forward since the time of the assessment including offshore wind projects, inter-connector cables across the North Sea and the interconnector project to Kent; (ii) Please summarise the proposals for the delivery of traffic mitigation schemes and explain how that could be achieved in practice without disrupting traffic from other projects including use of the A12/B1122 and A12/A1094/B1069 transport corridors by East Anglia ONE North and East Anglia TWO traffic; (iii) Please explain how cumulative impacts which are not currently	Design considerations taken during the preliminary design stage include: Optimising the alignment of proposed roundabouts and junctions so that most of the new construction can be undertaken outside the footprint of the existing highway network. Considering pavement design so that pavement overlays can be undertaken on sections of the proposed tie-in works with the existing highway in lieu of full depth road construction. Identification of reduced speed limits in the vicinity of construction works. These design considerations provide the following benefits to the existing road users: Reduced construction duration on live road networks where much of the works are undertaken off-line. Reduced interface duration with existing road users during tie-in works between proposed and existing road networks. The construction phase will require detailed consultation with Suffolk County Council in the development and approval of Traffic Management Plans for all interventions on the existing highway network. SZC Co. has held initial discussions with Suffolk County Council on proposed traffic management arrangement to be implemented during construction. The following traffic management principles have been broadly agreed with Suffolk County Council:	



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		proposed to be mitigated due to the length of time they are expected to occur and their deemed likelihood of occurring would be monitored, identified and then mitigated should they in fact occur?	 Proposed roundabouts and junctions will be prioritised and constructed early in the construction programme subject to construction access dates. All highway interventions will be developed, approved and programmed in consultation with Suffolk County Council prior to commencement of working on the existing road network. A12 and B1122 interventions such as tie-in works will be undertaken during offpeak travel times (night time or weekends). All Interventions on the existing highway network will always aim to maintain one way traffic flow under traffic light signal traffic management arrangement. Where necessary, road closures will be planned and coordinated with Suffolk County Council with alternative diversion routes communicated with road users and other impacted stakeholders. Use the new roundabouts for site access following their construction. Access to and from the A1094 to the A12 to be maintained during construction of Friday street roundabout. As with the design phase, the aim of the construction phase traffic management principles is to reduce the impact on existing road users and continue to provide access for other projects. 	



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			(ii) SZC Co. proposes to manage Sizewell C construction traffic through the implementation of a Construction Traffic Management Plan (Doc Ref. 8.7(A)) and Construction Worker Travel Plan (Doc Ref. 8.8(A)), which would be monitored on a quarterly basis throughout the construction phase and reviewed through a Transport Review Group (TRG). The TRG would include representatives from SZC Co., the local authorities and Highways England. A Transport Contingency Fund is to be established by SZC Co. through the Deed of Obligation (Doc Ref. 8.17(C)) and made available to the TRG in the event that further mitigation or corrective actions are required. SZC Co. proposes to monitor the cumulative effects of Sizewell C with Scottish Power Renewables of East Anglia 1 North (EA1N) and East Anglia 2 (EA2) during the construction phase and, if any significant effects arise, could utilise the Transport Contingency Fund to implement additional measures to manage/reduce Sizewell C effects. SZC Co. would support a proportionate approach to funding of any mitigation measures in the event that significant cumulative transport effects arise through the monitoring process.	



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ExQ1 PART 3 OF 6 Cu.1.23	The Applicant	Cumulative effects with other plans, projects and programmes SCC [RR-1174] in respect of the cumulative ecological impact, submits that it is not clear why the construction of the EA1 North and EA2 have been scoped out of the assessment of cumulative impacts, particularly in respect of Natura 2000 sites, when the cable corridor passes relatively close to the Sizewell C project. Please provide further details and reasoning to justify the scoping out of that matter from the cumulative impact assessment.	SZC response - Volume 1 Volume 10, Chapter 4 of the ES [APP-578] considered the potential for cumulative ecological effects to arise with the offshore components of EA1N and EA2 along with EA3, however, concluded that there would not be a potential for the onshore components of these schemes to result in cumulative ecological effects when considered in combination with the Sizewell C Project. The Applicant presented additional information on the cumulative ecological effects with the onshore components in Volume 3, Appendix 10.4.C of the ES Addendum [AS-201]. It considered the potential for cumulative effects with EA1N, EA2 and EA3 on the following receptor groups during construction: • Designated sites; • Farmland birds; and • Bats. The updated assessment concluded that construction and operation of the onshore elements of the three offshore windfarms, would not change the conclusions of the operational cumulative ecological effects and would remain as described within Volume 10, Chapter 4 of the ES [APP-578]. In addition to this, Appendix 13A considers any recent changes that have been made to the nearby energy Nationally Significant Infrastructure Projects (NSIPs), scoped in to the cumulative effects assessment in Volume 10 of the ES [APP-572 to APP-582]. In relation to the three offshore wind farms, the new information related to the construction programme only which would not change the conclusions of cumulative ecological effects	For clarity, East Anglia THREE makes landfall at Bawdsey, approximately 26km from Sizewell Beach and is not relevant to any onshore ecological cumulative effects with SZC. The EIAs for East Anglia ONE North and East Anglia TWO consider SZC within the onshore ecology assessment <i>Chapter 22 - Onshore Ecology</i> (EA2/EA1N APP-070) based upon SZC pre-application information. There were no significant impacts, largely a reflection of the lack of spatial overlap or proximity of the respective development footprints. Following the submission of the SZC DCO application, the assessments were reviewed by East Anglia ONE North Ltd and East Anglia TWO Ltd. Given that there were no changes to the order limits of SZC no updates to the submitted assessments were deemed necessary



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			assessment described within Volume 10, Chapter 4 of the ES [APP-578].	
Traffic and	Transport			
ExQ1 Part 6 of 6 TT.1.34	The Applicant, SCC, Scottish Power	Transport Assessment (TA) [AS-017] — Cumulative Assessment with EA1 and EA2 In the Table 26.2 of Chapter 26 of Environmental Statement (ES) for the East Anglia One North and Two Offshore Windfarm application it is identified that there may be a need for potential structural alterations to the existing bridge on the A12 at Marlesford to facilitate the movement	(i) SCC is not aware of any consideration by the Applicantof Marlesford Bridge. However, the Applicant indicates that the largest/heaviest AlLs are proposed to be transported to site via the permanent BLF. (ii) Information provided by SPR (See EA1N examination library [REP8-021]) considered that temporary strengthening of the bridge deck would be adequate for their AlL movements. In SCC's response (EA1N examination library [REP9-046]) it was noted that such work would only be permitted outside normal working hours to avoid disruption to traffic using the A12, including that to or from SZC.	Deadline 8 Submission - EA1N&EA2 Applicants Comments on Suffolk County Councils Deadline 7 Submissions (EA2/EA1N REP8-046) sets out East Anglia ONE North Limited and East Anglia TWO Limited position with regard to Marlesford Bridge. It is clarified that the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic.
		of abnormal load vehicles over this bridge. Has this requirement: (i) Been considered as part of the Sizewell C project? (ii) If this was to be	(i) Suffolk County Council (SCC) has confirmed that the highway structures on the A12 between the A14 at Seven Hills and the B1122 have all been approved by SCC for Special Type General Order (STGO) Category 1, 2 and 3 loads and	



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		required how would construction work impact on traffic flows on the A12 at Marlesford?	Construction and Use (C&U) loads (i.e. loads below 150 tonnes). It is proposed to provide a permanent beach landing facility (BLF) to deliver the largest/heaviest AlLs by sea. Given the existence of the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell, it is envisaged that any heavy loads not delivered via the permanent BLF would be delivered via the heavy load route. Therefore, structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project. (ii) As set out in (i), structural alterations to the bridge on the A12 at Marlesford are not considered to be required.	
ExQ1 Part 6 of 6 TT.1.62	The Applicant, SCC, Scottish Power	Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2 Is the traffic data input provided used in the modelling of the Scottish Power proposal EA1 and EA2	SSC response The Applicant submitted a technical note to SCC that highlighted the differences in the flows between those assessed within the respective DCOs; it is understood that this technical note will be submitted to the Examining Authority by the Applicant. There are some differences to the flows assessed; however, SCC considers these as very minor and highly unlikely to have a material impact on any conclusions	Please refer to comments on responses to ExQ1 PART 3 OF 6 Cu.1.7.
		modelling of the Scottish Power	considers these as very minor and highly unlikely to	



ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
		still the correct current data?	(SPR) in order to discuss the traffic generation included in the SZC Co. traffic models for EA1N and EA2 (taken from the preliminary environmental information report, PEIR) and compare it with the SPR traffic figures included in their Environmental Statement submitted with their applications for development consent. Whilst there are minor differences, it was agreed these would not have a significant effect on the conclusions presented in the Sizewell C cumulative impact assessment included in the Transport Assessment Addendum [AS-266] and Environmental Statement. In order to respond to this question, a note (Appendix 24B) has been produced summarising the differences in the SPR PEIR and ES traffic inputs.	
ExQ1 Part 6 of 6 TT.1.63	The Applicant, SCC, Scottish Power	Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2 Explain: (i) How highway mitigations proposed for this project would be aligned with those proposed by East Anglia One North and	(i) Given the complexity and programming of projects there are a number of scenarios that could occur; meaning that SCC needs to ensure that each project mitigates its impacts in isolation. It is expected that there will be ongoing engagement between the SCC, ESC, Scottish Power Renewables and Sizewell C Co. SCC considers the timing of interventions is critical to avoid construction activities causing delays to either Sizewell C or East Anglia One North and Two haul routes.	(i)&(ii) Deadline 11 Submission - 8.9 EA1N Outline Construction Traffic Management Plan (Clean) - Version 06 (EA2/EA1N REP11-017 of the East Anglia ONE North and East Anglia TWO examination) contains provisions to manage the mitigation measures with potential for abortive works, namely Friday Street junction, Marlesford and Yoxford by committing to: As part of the final CTMP submitted for approval under Requirement 28, the Applicants will submit further details of the above mitigation works it proposes to implement (if any) to address predicted impacts [at Friday Street junction, Marlesford and



ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
		Two offshore windfarms; (ii) How any overlap of mitigations proposed would be managed to minimise potential abortive work; (iii) How highway works would be coordinated between the projects; and (iv) How the Construction Traffic Management Plans would be aligned and managed to ensure consistent approach to traffic management between all projects and existing highway users.	This may require some activities being brought forward. (ii) SCC considers there are three locations where the potential for abortive work could occur (Marlesford, Yoxford and A12 / A1094 Friday Street junction), and all Projects are expected to mitigate their proportional impacts at these locations. It is anticipated that there will be on going engagement between the relevant parties on the programming of works for all projects, and as set out at Paragraph 83, 101 and 105 of REP9-003 of the EA1N DCO, as part of the final CTMP, SPR will submit details of the mitigation works it proposed to implement (if any) to address predicted impacts at Friday Street junction, Marlesford and Yoxford taking into account of the most up to date information available on the Sizewell C programme to avoid the potential for abortive works. (iii) At SZC-402 to 404 of REP8-112 of the EA1N/EA2 DCO, which forms the EA1N / EA2 Statement of Common Ground with SZC Co., there is a commitment for regular engagement between the parties with regards to elements of the EA1N/EA2 mitigation. At SZC-501, there is a commitment to engage regularly between	Yoxford] taking account of the most up to date information available on the SZC proposals and programme. (iii)&(iv) East Anglia ONE North Limited and East Anglia TWO Limited have ongoing engagement with SZC Co. pursuant to the development of the respective parties' DCO plans. Deadline 2 Submission - 9.10.28 Initial Statement of Common Ground - East Anglia One North and Two - Revision 1.0 (REP2-092) contains the following 'in principle' agreement: The Applicant and EA1/EA1N will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicant and EA1/EA1N as well as the wider community that all projects be coordinated as far as reasonably practicable.



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			the parties so that any interface between the projects can be considered at an early stage. The Applicant would keep the Councils informed of highway works through the Transport Review Group incorporating their engagement with SPR and it is understood that this commitment will be included in a future submission of the CTMP.	
			(iv) The construction management plan of each project reflects their relative works, scale and impacts and as such are not identical. Through the TRG the highway authority will keep the Applicant informed of upcoming highway works and any programming associated with major schemes (i.e. the MRN works). SPR will be appointing a Construction Transport Management Plan Coordinator (paragraph 14 of the Outline Construction Transport Management Plan https://infrastructure.planninginspectorate. gov.uk/wpcontent/ipc/uploads/projects/EN 010077/EN010077-004831-8.9%20EA1N%20Outline%20Construction %20Traffic%20Management%20Plan%20 (Tracked).pdf) for their projects and it will be imperative that they co-operate with	



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			EA1(N) / EA2 DCO's there is a commitment by NNB and SPR to engage during design and construction of their respective projects (SZC-501 https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN 010077/EN010077-004486-ExA.SoCG18.D8.V2%20EA1N&EA2%20S tatement%20of%20Common%20Ground %20with%2 0NNB%20Generation%20Company%20(SZC)%20Limited.pdf) although SCC feels this short of the details require to assess how this will be done and whether this includes co-operation managing construction and worker trips.	
			SZC response - Volume 1 SZC Co. recognise the importance of regular and effective communication between SZC Co., Scottish Power Renewables (SPR) and Suffolk County Council (SCC) to co-ordinate the delivery of highways mitigation, so as to minimise the impact on the community and travelling public, avoid duplication and abortive works. A commitment to regular engagement during design and construction phases is set out in the Statement of Common Ground (SoCG) between SZC Co. and SPR. SZC Co. (Doc Ref. 9.10.28). SZC Co. propose to establish clear communications protocols between all three parties, which will be defined in the	



ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
			terms of reference of the Transport Review Group (TRG). (i) The SPR EA1N and EA2 project on-shore order limits overlap with Sizewell C order limits in three locations: (a) Sizewell Gap, (b) A12 / Friday Street and (c) B1069 Snape Road / A1094 Aldeburgh Road. Appendix 1 to the SoCG between SPR and SZC Co. (Doc Ref. 9.10.28) shows the overlapping areas. (a) Sizewell Gap will be used as a construction access during the initial period of construction of Sizewell C, but the works proposed by SPR do not materially conflict with the construction of Sizewell C. EA1N and EA2 have provided an Outline Sizewell Gap Construction Method Statement20 which describes the nature of the works on Sizewell Gap and how they are proposed to be undertaken to ensure that traffic is not disrupted. (b) Both SZC Co. and SPR propose an improvement at the A12 / A1094 junction. SPR propose a traffic signal scheme, whilst SZC Co. propose a roundabout. It is understood that Suffolk County Council (SCC) have identified that the proposed SZC Co. roundabout improvement, if delivered early enough, could negate the need for the SPR signal	



ExA Question Ref.	Question addressed to	ExA Question	SZC Res	ponse at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
				scheme. The updated Implementation Plan (Doc Ref 8.4I(A)) shows that the Friday Street roundabout is proposed to be delivered early in the Sizewell C construction phase. SZC Co. will continue to engage with SPR and SCC as the detailed delivery programmes are developed to agree the works required to avoid duplication or abortive work. (c) At the A1094 / B1069 junction SPR propose temporary carriageway widening and vegetation clearance (on B1069) to accommodate AIL movements. SZC Co. mitigation also proposes vegetation clearance (A1094), signs and lines and a reduced speed limit from 60mph to 40mph to improve safety. The mitigation proposals are complementary, and should not lead to any abortive works.	
			(ii)	Refer to (i)	
			(iii)	The SoCG between SZC Co. and SPR (Doc Ref. 9.10.28) states the commitment of SZC Co. and SPR parties to engage regularly during design and construction so that any interface between the projects can be considered at an early stage, recognising it is in the interests of both parties and the wider community.	



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			(iv) The SZC Co. Construction Traffic Management Plan (CTMP) (Doc Ref 8.7(A)) states that the Transport Review Group (TRG) can invite representatives from other organisations to meetings for particular agenda items and this could include SPR to discuss the co-ordination of the two projects if considered necessary by the TRG. As stated above, SZC Co. Also propose to establish clear communications protocols between all three parties, which will be defined in the terms of reference of the Transport Review Group (TRG).	
ExQ1 Part 6 of 6 TT.1.66	The Applicant	Transport Assessment Addendum [AS-266] – Junction Modelling Junction 5 A1094/ B1069 junction, explain why the cumulative impact of Scottish Power is not considered given that in the assessment in the TA [AS-107] the cumulative impact has the junction operating over capacity in some time periods in both	SZC response - Volume 1 Junction 5: A1094 / B1069 Snape Road In the junction modelling within the Transport Assessment Addendum [AS-266], the B1069 minor arm is predicted to operate with a maximum ratio of flow to capacity (RFC) of 0.80 due to the combined impact of Sizewell C traffic and the proposed mitigation (see Table 9.10). This is within the 0.85 design threshold. The delay results show that the Sizewell C traffic causes delays to increase in 2023 and 2028 by up to 12 seconds per vehicle and by no more than 3 seconds per vehicle in 2034. In the Transport Assessment Addendum [AS-266], only results from the without Scottish Power model are presented within the main body of the report in Chapter 9, in the interests of	Deadline 6 Submission - ExA.AS-6.D6.V2 EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02, Section 2.5.3 (EA2/EA1N REP6- 043 of the East Anglia ONE North and East Anglia TWO examination) contains a cumulative assessment of the A1094/B1069 junction and concludes no significant impacts. In reaching that conclusion it is noted that the SZC assessment (AS-266) does not take account of the commitments made in the ONE North and East Anglia TWO Projects' ES to mitigate driver delay (EA2/EA1N APP-074). These include:



ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
		the Early Years and Peak Construction periods with Scottish Power traffic.	being concise. However, the results for all junction models were provided in Appendix 9A [AS-266]. The summary of junction modelling results in Appendix 9A provides the ability to compare the 'J5 existing layout with SPR', 'J5 mitigation layout with SPR' and 'J5 mitigation layout without SPR' results. As set out in Appendix 9A of the Transport Assessment Addendum [AS-266], the addition of the Scottish Power traffic causes the RFC of the B1069 arm of the junction to increase to 0.96 during the hour of 17:00-18:00 during the early years and peak construction phases. All other arms of the junction are shown to operate within the 0.85 RFC design threshold for all assessed hours. The B1069 arm provides direct access to the Scottish Power site and the capacity of the B1069 arm are considered to be an impact of the Scottish Power site and not Sizewell C. An element of caution needs to be given to the junction modelling as it is based on a number of worst case assumptions for both Sizewell C and SPR projects aligning in addition to limitations within the modelling software itself. Given that the junction modelling shows that the junction is expected to operate within the design threshold of 0.85 RFC for all arms and all time periods and scenarios except for one hour (17:00- 18:00) in the cumulative assessment for the B1069 arm in the early years and peak construction, it is proposed to monitor and manage the effects at the junction through the Construction Worker Travel Plan (CWTP) (Doc Ref 8.8(A)) and Construction Traffic Management Plan (CTMP) (Doc Ref 8.7(A))	 Scheduling of construction activities to smooth peak traffic demand; Increasing the employee to vehicle ratio through the use of minibus pickup or crew vans; or Increasing the employee to vehicle ratio through incentive measures.



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			rather than provide additional mitigation as part of the DCO. As set out in the CWTP (Doc Ref 8.8(A)) and CTMP (Doc Ref 8.7(A)), the Transport Review Group (TRG) will be able to draw down from a transport contingency fund during the construction phase if the transport monitoring shows that there are significant unmitigated impacts at particular junctions or roads. Therefore, it is proposed for this junction to be monitored and managed through the transport contingency fund. Any contingency fund mitigation would need to be cognisant of the transport policy set out in National Policy Statement of Energy (EN-1), which states at paragraph 5.13.8 that "where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts." Paragraph 5.13.9 of EN-1 goes on to recognise that the decision maker should "have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures." Therefore, demand management measures should be considered by the TRG if drawing down any transport contingency funding ahead of physical highway improvements.	
ExQ1 Part 6 of	The Applicant	Transport Assessment (TA) [AS-017] –	SZC response - Volume 1 Junction 13: A12 / B1122	Deadline 6 Submission - ExA.AS-6.D6.V2 EA1N&EA2 Sizewell C Cumulative Impact



ExA Question Ref.	Question addressed to	ExA Question	SZC Response at Deadline 2	East Anglia ONE North Limited and East Anglia TWO Limited's Comment at Deadline 3
6 TT.1.71		Junction Modelling Junction 13 A12 / B1122 Junction. Provide a Junction 9 assessment of the early years scenario of the existing layout so as to enable direct comparison of performance between the existing and proposed layouts and in addition so comparison can be made with the Junctions 9 assessment undertaken within the East Anglia windfarm applications	A VISSIM micro-simulation assessment was undertaken for the Yoxford area and included the A12 / B1122 junction. The VISSIM model covers the existing and proposed layouts, so junction modelling was not considered necessary at this location from a highway capacity perspective. In the 2023 VISSIM scenarios (no roundabout upgrade), queues and delays on the B1122 approach are expected to increase beyond those observed in 2015. A small increase is predicted in the 2023 Reference Case and a larger increase in the 2023 Early Years scenario, particularly from 07:30-08:00. This was summarised in Table 24 and Table 26 of Appendix 9B of the Transport Assessment Addendum [AS-266]. In the 2028 VISSIM scenarios, queues on the B1122 approach are expected to increase further still in the 2028 Reference Case scenario. However, in the 2028 Peak Construction scenario, queues are predicted to return to 2015 levels or better due to the introduction of the roundabout, despite the increase in traffic due to Sizewell C. This was summarised in Table 36 and Table 38 of Appendix 9B of the Transport Assessment Addendum [AS-266]. In the 2034 VISSIM scenarios, queues on the B1122 approach are expected to increase in the 2034 Reference Case scenario. However, in the 2034 operational phase scenario, queues are predicted to	Assessment Note (Traffic and Transport) - Version 02, Section 2.5.3 (EA2/EA1N REP6- 043) contains a cumulative assessment of the A12/B1122 junction and concludes no significant impacts. In reaching that conclusion it is noted that the SZC assessment forecasts the new roundabout would operate with spare capacity for cumulative impact Scenario B¹ (Appendix 9B of the Transport Assessment Addendum (AS-266)) and the existing junction would generally operate with spare capacity for a cumulative impact Scenario A² (8.5 Transport Assessment, Section 9.16 (APP-602)).

¹ SZC peak construction traffic (main development sites) + East Anglia ONE North and East Anglia TWO peak construction traffic, assuming a 2028 reference year.

² SZC early years construction traffic + East Anglia ONE North and East Anglia TWO peak construction traffic, assuming a 2023 reference year.



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			return to 2015 levels or better due to the presence of the roundabout. This was summarised in Table 46 and Table 48 of Appendix 9B of the Transport Assessment Addendum [AS-266]. The proposed roundabout does create a small increase in delays (up to +4 seconds per vehicle on average) on the A12 approaches but offers significant relief to the B1122 approach (reducing delay by up to 29 seconds per vehicle on average) mitigating the impacts of both the committed growth and Sizewell C demands.	
ExQ1 Part 6 of 6 TT.1.130	The Applicant	Cumulative Transport Impacts [ES-201]- Appendix 10.4 Explain why in the cumulative assessment provided with the East Anglia projects none of the assessments have considered traffic levels in the representative hour. Using this methodology, as is used in Chapter 10 [APP-198], it could for example change the Severance assessment in the early years such that it	SZC response - Volume 1 The assessment of cumulative transport effects in Appendix 10.4.A of Volume 3 of the ES Addendum [AS-201] assessed the typical/average cumulative transport effects based on average daily traffic flows. As part of ongoing discussions with Suffolk County Council (SCC) and East Suffolk Council in order to seek to reach common ground on the transport environmental assessment, further work is ongoing by SZC Co. to address SCC's and ESC's comments on the assessment. This includes a further cumulative impact assessment of the representative hour. A technical note will be submitted to the Examination summarising the further assessment that is being undertaken as part of the Statement of Common Ground discussions with the local authorities.	No comment



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		may show a major adverse effect significance on Link 11, B1125 through Westleton, with cumulative traffic added. Provide comparable assessment methodology using the representative hour as in the original Chapter 10 so direct comparison can be made.		
ExQ1 Part 6 of 6 TT.1.132	The Applicant	Cumulative Transport Impacts [ES-201]- Appendix 10.4 Scottish Power in the assessment of the transport impacts of both EA1 North and EA2 have identified the following area of mitigation required. Provide explanation why in the assessment of the effects of Sizewell C traffic, the	SZC response - Volume 1 SZC Co. is committing to substantial highway mitigation infrastructure embedded within the scheme proposals (e.g. Sizewell link road, two village bypass, freight management facility, park and ride facilities etc). In addition, SZC Co. has also identified significant mitigation funds which will be secured through the Deed of Obligation (Doc. Ref. 8.17(C)). Mitigation is proposed at all three locations identified in the question and is summarised as follows: (i) SZC Co. proposes the construction of the Sizewell link road running generally in parallel with the B1122 to mitigate potential peak construction impacts on	No comment.



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		following mitigations are not identified: (i) For the EA projects only footway improvements in Theberton on the B1122; (ii) Cumulative impact with SZC pedestrian improvements at Yoxford on the A12; and (iii) Cumulative impact with SZC pedestrian improvements at Marlesford on the A12	communities along the corridor, including Theberton. SCC and ESC are developing proposals to adapt the B1122 into an active travel corridor prioritising cycling and walking. SZC Co. are supportive of the creation of an active travel corridor along the B1122 and keen to work with SCC and ESC to bring about those cycling and walking improvements on the B1122, which would be enabled by the completion of the Sizewell link road. See also the response to question TT.1.95 of this chapter. (ii) SZC Co. proposes to upgrade the A12 / B1122 junction from a priority ghost island T-junction to a three-arm roundabout (referred to as the 'Yoxford roundabout') to increase traffic capacity. Proposals incorporate new and wider footways tying into the existing pedestrian network. Mitigation is proposed at Marlesford, to be delivered by SCC through the Marlesford and Little Glemham Improvement Fund, secured via the Deed of Obligation (Doc. Ref. 8.17(C)). See response to question TT.1.99.	