

The Sizewell C Project Examination (ref. EN010012)

Deadline 3 - Highways England comments

Date: 23rd June 2021

1. Please find enclosed Highways England's comments on information/submissions received by Deadline 2 of the Sizewell C examination, specifically the following documents prepared by the applicant NNB Generation Company - Sizewell C Company (SZC Co): Construction Traffic Management Plan; Traffic Incident Management Plan; Construction Worker Travel Plan; Draft Deed of Obligations; and the draft Statement of Common Ground between Highways England and SZC Co.
2. Highways England is appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). In respect to Sizewell C, our interests relate to the impact of the proposal on the A14 and A12 trunk roads and their connections with the local road network, ensuring that the SRN can continue to operate safely and efficiently during construction and operation.

Summary

3. Highways England has reviewed the Construction Traffic Management Plan (ref. 8.7, Revision 2, June 2021), Traffic Incident Management Plan (ref. 8.6, Revision 2, June 2021), Construction Worker Travel Plan (ref. 8.8, Revision 2, June 2021) and Draft Deed of Obligations (re. 8.17, Revision 4, June 2021) prepared by SZC Co. and submitted by Deadline 2.
4. Whilst progress has been made through on-going dialogue with SZC Co. representatives regarding the management of SZC traffic and potential levels of impact on the SRN, there remain some notable gaps in information and evidence that would provide Highways England with greater reassurance that the development's impacts can be managed appropriately and the proposed mitigation measures and protocols are realistic and deliverable.
5. A key outstanding concern relates to the management of construction Heavy Goods Vehicles (HGVs) across the entire road network and the role, specification and effectiveness of the proposed Delivery Management System (DMS).
6. We have concerns that the Incident Management Area (IMA) is too limited and await further details on procedures for notifying HGVs on route to the Freight Management Facility (FMF) in the event of an incident or disruption.
7. We recommend details are provided on HGV routes over a wider area; potential holding locations or parking areas across the SRN which HGVs bound for the FMF could be advised to route to in the event of an incident or disruption; a flow chart setting out the sequence of procedures or steps that would occur in the event of an incident or disruption; and details of the Global Positioning System (GPS) based DMS-tracker and geofencing.

8. This is set in context with an overarching concern around the deliverability of SZC Co's mode strategy for transporting construction materials to/from the development site. We are encouraged by the efforts which SZC Co. appear to be going to, to ensure that rail and sea modes will play a significant role which will reduce traffic impacts on the road network.
9. Consequently, the HGV totals are reduced from earlier assumptions and this will reduce the pressure placed upon the SRN. We are in agreement with the maximum HGV numbers set out in the Construction Traffic Management Plan in the context of the impact on the SRN, although if lower volumes can be achieved this would be beneficial in traffic capacity terms, for example through efficiencies, types/payloads of HGVs, increasing the proportion of materials by rail or marine. Highways England's acceptance of the HGV numbers, the traffic modelling inputs, and subsequent conclusions drawn regarding impacts of SZC traffic on the SRN are contingent upon SZC Co. successfully delivering its proposed mode strategy which includes significant upgrade works to the rail network. Although not directly applicable to our organisation, we understand that the acceptance, approvals and evidence that rail upgrade proposals are realistic and deliverable, have not yet been secured through discussions with Network Rail and therefore we are keen to see further progress being made in this regard.

Detailed comments

Construction Traffic Management Plan (ref. 8.7, Revision 2, June 2021)

10. Paragraph **4.4.6** sets out the HGV limits which has underpinned SZC. Co's assessment of the road network. Highways England is in agreement with the assumed 700 two-way daily (busiest weekday day) limit during peak construction, rising from 600 in the early years, in the context of the assessed impact on the SRN. We recognise however to achieve these numbers, a substantial proportion of construction materials will need to be transported by rail and marine, as set out in the Freight Management Strategy, and that the necessary approvals and evidence to demonstrate the feasibility and deliverability of improvements to rail and marine infrastructure are not fully in place at this time.
11. Paragraph **4.4.29** of the Construction Traffic Management Plan (CTMP) outlines the objectives of the proposed Delivery Management System (DMS tracker, including the ability to provide a mapping interface to give real time visibility of HGV locations within a geofenced area (a virtual boundary) to monitor HGV movements.
12. The proposed geofences are not defined in the CTMP. Highways England has had some preliminary discussions with SZC Co. representatives regarding the concepts of GPS geofences but await a more detailed specification. Related to the IMA (see paragraph 21 below) we consider that the DMS-tracker will need to have sufficient coverage to enable construction traffic approaching the FMF and the main construction site to be viewed over a large area and for an effective response to be made in the event of disruption or a violation of HGV routing rules.
13. We recognise that SZC. Co's ability to manage a construction HGV over its entire route from its point of origin to Sizewell may be impractical, especially as we understand it there is potential for some construction movements to originate from other parts of the UK and possibly northern France, but not beyond the realms of the technology perhaps.

The DMS-booker would presumably provide confirmation of all HGV construction traffic movements, their origins, the designated routes to reach Sizewell, however a question remains around whether the geofence will be limited to the IMA or it will be defined over a larger area.

14. Paragraph **4.4.30** of the CTMP states that smaller supply chain partners may be excluded from the DMS-tracker because they do not have the required GPS equipment installed in their fleet, and that a smart phone app “could be developed” to allow integration. It is uncertain of how much reliance will be placed upon smaller suppliers, but if they were to make up a sizeable proportion of all construction traffic movements, any lack of ability to monitor their movements through the DMS-tracker will be a significant disadvantage to the efficient running of the FMF and main construction site. Furthermore, the broad definition of HGVs adopted by SZC Co. under paragraph **3.2.1** includes some larger Light Goods Vehicles (LGVs) which are potentially less likely to be fitted with the GPS technology required for the DMS-tracker, and therefore would also be reliant upon an alternative app. Highways England considers that as well as the DMS-tracker using GPS-based technology, SZC Co. should commit to developing an alternative app-based system to ensure all supplier’s vehicles are tracked and managed.
15. Paragraphs **4.4.38** and **4.4.39** refer to the use of laybys on the local road network by construction HGVs presumably awaiting a slot to arrive at the construction site. Similar issues may occur on the SRN by construction traffic heading towards the FMF. Clarification is requested from SZC. Co. regarding the management of time slots at the FMF, notably whether HGVs will have a short time slot to arrive or whether there would be some flexibility that would enable HGVs to arrive early, for example up to 15-30 minutes prior to the defined slot.
16. In the event an HGV was approaching the FMF earlier than allocated arrival slot, and there are measures to prevent or penalise early entry into the FMF, HGV drivers may be forced to find a place to park prior to reaching the FMF, or in the vicinity of the FMF on either the SRN or on local roads. There are for example several laybys on the A14 and A12 west of the FMF which could be used in such instances. Highways England’s concern is that these laybys could get quickly overrun by waiting HGVs, even if for a short period of time. The monitoring and discouraging of use of laybys should apply to all SZC related traffic including LGVs. An HGV parking accumulation assessment of the FMF would also be helpful to understand the expected dwell times and turnover of spaces.
17. Paragraphs **6.2.5** and **6.2.6** indicate that LGVs will not be covered by the DMS-tracker however they will be encouraged to adhere to the signage strategy and a driver induction will be provided on arrival at the construction site. It is accepted that LGVs will be more difficult to control and we understand the volume of LGVs compared with cars and HGVs may not be particularly significant. Nevertheless, consideration should be given to providing an online induction and route information to LGV drivers/operators prior to travelling to the construction site for the first time.
18. Paragraph **7.2.3** refers to the use of a Muster Port to temporarily store construction materials prior to transporting by sea to the proposed Beach Landing Facility. It should be clarified whether materials would be transported to the muster port by sea first, or by road, and if the latter whether there would be an impact to consider on roads in the

vicinity of the muster port. Clarification should be provided of the potential options for muster ports, for example Lowestoft and Great Yarmouth (A47), or the Ports of Felixstowe (A14) and Harwich (A120), all of which lie on the SRN.

19. **Table 8.1** describes the proposed CTMP monitoring. The proposed monitoring frequency is set at monthly intervals for the first 3 months of construction and then every 3 months, presumably then for the full duration of construction. If this is the case, it is recommended that the frequency of monitoring is increased again to monthly intervals for the first 3-6 months of peak construction where activity at the development site is expected to intensify.

Traffic Incident Management Plan (ref. 8.6, Revision 2, June 2021)

20. Many of the points raised in relation to the CTMP are also relevant to the Traffic Incident Management Plan (TIMP). This document does not appear to have evolved as much from the previous version submitted as part of the original DCO. Highways England's comments raised previously would therefore still apply in most cases.
21. **Plate 1.1** shows the proposed IMA. We note that the IMA has now been extended to cover the A14 between the Seven Hills interchange (A14 Junction 58) and Beacon Hill interchange (A14 Junction 51) at Needham Market (previously it only extended as far west as the Wherstead interchange (A14 Junction 56)). The extension is welcomed, and we recognise that the Beacon Hill interchange is critical in terms of ensuring construction traffic does not divert off the A14 and 'cut the corner' using the B1078 to reach Sizewell.
22. We recommend the IMA is extended further to include the remainder of the A14 to the Port of Felixstowe and the A12 south of Ipswich. The length of the A12 to be included should be discussed further with Highways England and it depends on the intended purpose of the IMA. If SZC Co. envisages that beyond the IMA they do not intend to monitor HGVs (see discussion on the DMS-tracker under the CTMP above) then the IMA should certainly be extended. We consider at a minimum the IMA should extend the length of the A12 south of Ipswich to the Suffolk county border or potentially further south.
23. Highways England considers that in order to provide a clear indication of how incidents would be managed and the processes of communication involved, it would be helpful for SZC Co. to provide a flow chart setting out the broad sequence of steps that would be followed. It is appreciated that different types and locations of incidents may require slightly different procedures, however the same broad steps would mostly apply. For example, what would be the steps taken if the construction site needed to be closed at short notice? Highways England is seeking assurance that the steps likely to be taken are well defined and that any assistance we can or are expected to provide is clear.
24. Linked to the discussion earlier on the proposed DMS-tracker, Highways England awaits further details on defined HGV routes not only within the IMA but the wider network. This should cover an area wide enough to include critical route decision points on the SRN. We consider therefore that the M11 (between Junctions 6 and 9a), A11 (between the M11 and A14), A120 (between Bishop's Stortford/Stansfeld and Marks Tey) and the M25 (between Junctions 27 and 28) should be included. Although they do not form part of the

SRN, the A13 and A130 between The Port of Tilbury and Chelmsford should also be included.

25. Furthermore, we have had discussions with SZC Co. representatives on defining suitable locations where HGV construction traffic could be advised to park in the event of an incident further downstream on the way towards the FMF. This should identify safe locations suitable to accommodate waiting HGVs which may include defined roadside services, and in some instances, laybys. These should be identified across the network mentioned in paragraph 23 above. It should be noted that in contrast to the A14, we consider that the A12 south of Ipswich has fewer and more dispersed locations which could be suitable for waiting HGVs.
26. Paragraph 5.2.3 discusses the closure of Orwell Bridge in relation to high winds. Highways England has implemented measures to reduce closures due to high winds by means of a changeable speed limit. However, it should be noted that the bridge is still susceptible to closures for due to other reasons.

Construction Worker Travel Plan (ref. 8.8, Revision 2, June 2021)

27. **Table 3.1** presents the main development site mode share assessment targets. Highways England queries the reason for excluding rail as an access mode. Rail has the potential to transport workers from locations further afield including Colchester and Chelmsford, trips that may otherwise be made by car along the A12 corridor. It is recognised that passengers would need to change trains in Ipswich which will influence the attractiveness of this mode, and mode share is likely to be very small, but given one of the proposed Park and Ride facilities is next to a railway station, we would consider it sensible to monitor rail usage.
28. **Table 3.2** presents the main development site mode share aim targets. We consider that car sharing should play an even bigger role than the 5-6% indicated.
29. **Table 3.4** presents Park and Ride mode share aim targets. The aim targets are 20% Car Passenger for the Northern Park and Ride and 17% for the Southern Park and Ride, compared against 75% and 77% respectively for Car Driver mode. It is noted under paragraph 4.6.2 of the CWTP a car share scheme is proposed. Clarification is requested that targets have been informed by experience at similar construction sites such as Hinkley Point C.
30. Paragraph 6.5.1 describes the proposed Contingency Effects Fund. Highways England requests that maps be provided clarifying the roads and junctions where contingency funds could be spent and confirmation therefore of whether the SRN will be covered.

Draft Deed of Obligations (re. 8.17, Revision 4, June 2021)

31. Under **Schedule 16 paragraph 2.3** Highways England welcomes the opportunity that we will have to review the Operational Travel Plan prior to the approval of Suffolk County Council. We request that this is further clarified in the CWTP document.
32. Under **Schedule 16 paragraph 5.1** reference is made to an A14 signage strategy in the context of the B1078 road safety contribution. We recognise the importance of signage

in influencing the safe and efficient movement of Sizewell C construction traffic. We however recommend that the definition of the signage strategy is broadened slightly to cover the A12 approach towards the A14/A12 Copdock Interchange as traffic heading towards the FMF or rather the construction site could still potentially route towards the B1078 (or other alternatives routes to the north of or through Ipswich) in the event of severe disruption east of the Copdock Interchange.

33. Under **Schedule 16 paragraphs 7.1-7.5** reference is made to obtaining approvals from Suffolk County Council for abnormal indivisible loads (AIL) structural surveys and routes. This should be amended to also include Highways England under its duties of reviewing and approving AIL movements on behalf of the Secretary of State for Transport.

Statement of Common Ground

34. Highways England has liaised with SZC Co. representatives to prepare the draft Statement of Common Ground. We consider that the version which was prepared and submitted as part of Deadline 2 continues to reflect our current stance and that we will continue to engage with SZC Co. representatives to work towards resolving more of the outstanding issues.

Protective Provisions

35. Highways England is currently reviewing the need to put forward protective provisions concerning the Strategic Road Network which we intend to share and discuss with SZC Co. at a future date.