

ID Number: 20026012

The Sizewell C Project, Ref. EN010012

Correction to Suffolk County Council Deadline 2 response to ExA's Written Questions (ExQ1) TT.1.82 [REP2-192] (clean version)

Suffolk County Council Registration ID Number: 20026012

25 June 2021

It has come to our attention that, due to a drafting error, we submitted at Deadline 2 incorrect figures in our response to the ExQ TT.1.82 [REP2-192]. We sincerely apologise for this, and any confusion that this may have caused. The correct answer is included in this representation.

ExQ1	Question to:	Question:
TT.1.82	SCC	Transport Assessment Addendum [AS-266] – Junction Modelling A12 Corridor Assessment. Paragraph 9.6.20 states that "Based on the VISSIM assessment, no perceivable impact is predicted and therefore no mitigation in the form of highway improvements is considered to be required for the A12 corridor between Seven Hills and Melton. SZC Co. will implement a Construction Traffic Management Plan and Construction Worker Travel Plan to monitor and manage the impacts of Sizewell C freight traffic and workforce movements during the construction of Sizewell C. A Transport Review Group (TRG) will be established to review these plans and review the monitoring report produced each quarter. A transport contingency fund will be made available to the TRG to be used if necessary, to implement any further mitigation measures and remedial actions." Do you agree with this analysis and the suggested approach to any necessary mitigation?
	Response	SCC do not agree with the conclusion that mitigation is not required on this corridor. SCC recognises that issues along this corridor are both pre-existing and worsened by general background growth, but that these issues will be further exacerbated by Sizewell C traffic. In particular, the Applicant's modelling, for which there is inherent risk within the results, has identified that the increase in traffic will result in the following impacts: a) In the early years average delay per vehicle will increase by 2 to 5 seconds and total delays on the corridor by 27 to 47 hours as a result of Sizewell C traffic. North to south journey times along the entire length of the corridor would increase by between 1 and 23 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under c), there are notable significant impacts of delay in specific location. b) For Peak Construction, a number of scenarios have been modelled, but average delay per vehicle would increase by between 7 and 11 seconds and total delay would increase between 67 and 133 hours as a result of Sizewell C traffic. North to south journey times would increase by between 9 and 62 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under d), there are notable significant impacts of delay in specific location. c) Some examples of noticeable impacts in the Early Years scenario include the following: O An approximate 17 metre increase in the queue length on the A12 north approach to the A12 / B1438 roundabout.

ExQ1	Question to:	Question:
		 An approximate 29 metre increase in the queue length and 23 second increase on journey time on the Foxhall Road approach to the A12 / Foxhall Road roundabout. An approximate 30 metres increase in the queue length on the A12 South approach to the A12 / Barrack Square roundabout. An approximate 25 metres increase in the queue length on the Barrack Square approach to the A12 / Barrack Square roundabout. Some examples of noticeable impacts in the Peak Years (1,000 HGVs) scenario include the following: An approximate 113 metre increase in the queue length and 16 second increase in journey time on the A12 south approach to the A12 / B1438 roundabout. An approximate 76 metre increase in the queue length and a 37 second increase in journey time on the B1079 east approach to the A12 / B1079 roundabout. An approximate 82 metre increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. An increase in travel time of 19 seconds on the A12 south approach to the A12 / A1214 roundabout. An approximate 104 metre increase in the queue length on the Anson Road approach to the A12 / Anson Road roundabout An approximate 28 second increase in delay at the Eagle Way approach and a 38 second increase in delay at the Anson Road approach to the A12 / Anson Road roundabout. An approximate 91 metre increase in the queue length on the A12 north approach to the A14 / A12 Seven Hills roundabout e) Although the methodology and therefore the outputs of the environmental assessment of road traffic have not been agreed, there are a number of locations along the corridor where the Applicant has identified a Major Adverse impact on Fear and Intimidation. f) Outside of the impacts associated with reduced capacity and increased journey times associated with AILs and incr

ExQ1	Question to:	Question:
LVÓT	Question to:	These impacts will result the following:
		 a) Negative impacts on the Suffolk economy, including on tourism, as a result of increased journey times (real and perceived); b) Reduced resilience along the corridor; c) Negative impacts on road safety as a result of increased congestion and driver frustration; d) Increased severance along the corridor; and e) Reduced vulnerable road user amenity along the corridor, particularly for pedestrians
		on the A12 at Woodbridge, and cyclists along the corridor. While large vehicles cannot deviate from the A12 or B1122, significant delays or disruption on this route will displace light vehicles to other routes such as the A1152/B1069 or B1078 preferable for workers. This may then result in additional impacts elsewhere.
		Notwithstanding the comments made on the modelled results, the modelling within the Transport Assessment relies on the assumption made regarding the volumes of construction traffic using the network particularly during peak hours. For example, the assumed shift pattens for workers places most journeys outside peak hours, and the number of peak hour HGV movements are currently not proposed to be capped. SCC considers this a significant risk and is requesting suitable monitoring and controls to ensure that the theoretical numbers assumed in the modelling are not exceeded. See LIR [REP1-045].
		SCC are preparing a bid for funding improvements to the A12 corridor east of Ipswich. These are primarily to support local growth over and beyond the duration of the Local Plan but would reduce delays and mitigate some of the impacts resulting from SZC. SCC as the local Highway Authority expects the Applicant to provide a proportional financial contribution towards Major Road Network (MRN) improvements, to mitigate Sizewell C's impacts on capacity, economic impacts of congestion, impacts on fear and intimidation and road safety along this part of the A12.
		The economic impacts of congestion as a result of Sizewell C construction traffic for this corridor is evidenced by a high-level assessment by Aecom commissioned by SCC, which is submitted as SCC Appendix to ExQ SE.1.42 . Accepting the limitations of this assessment in terms of it not being able to provide an exact prediction of the economic impact, SCC considers that the assessment clearly indicates a significant negative cost on

ExQ1	Question to:	Question:
		the economy for the A12 corridor between Seven Hills and A1152 Woods Lane as a result of increased congestion from Sizewell C construction traffic. It should be noted that these calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The identified range of the economic impacts based on the high level assessment method needs to be considered alongside the other impacts on this corridor, and supports the case for Sizewell C to provide a proportionate contribution towards the MRN improvements.
		The proposed MRN improvements may also make the A12 a more attractive route in terms of journey time and reliability for workers than cross country routes such as the B1078, thus may reduce the impact of Sizewell C on these routes.
		If the MRN bid is unsuccessful the LHA wil be looking to secure localised highway improvements funded by the Applicant to mitigate the specific SZC transport impacts on the A12 corridor.
		SCC considers that the Applicant needs to contribute to the mitigation as suggested above, and disagrees that reliance on the contingency fund to provide mitigation would be appropriate in this case. If mitigation was reliant on the contingency fund, the mitigation would be reactive, i.e. an impact occurring would trigger a need for mitigation which would at that point still need to be designed and delivered. Thus, mitigation on the A12 corridor would only be delivered after the impact or would not be possible to deliver it due to the combined impact of construction traffic and disruption of the construction of the mitigation itself.



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25 June 2021

It has come to our attention that, due to a drafting error, we submitted at Deadline 2 incorrect figures in our response to the ExQ TT.1.82 [REP2-192]. We sincerely apologise for this, and any confusion that this may have caused. The correct answer is included in this representation.

ExQ1	Question to:	Question:
TT.1.82	SCC	Transport Assessment Addendum [AS-266] – Junction Modelling
		A12 Corridor Assessment. Paragraph 9.6.20 states that "Based on the VISSIM assessment, no perceivable impact is predicted and therefore no mitigation in the form of highway improvements is considered to be required for the A12 corridor between Seven Hills and Melton. SZC Co. will implement a Construction Traffic Management Plan and Construction Worker Travel Plan to monitor and manage the impacts of Sizewell C freight traffic and workforce movements during the construction of Sizewell C. A Transport Review Group (TRG) will be established to review these plans and review the monitoring report produced each quarter. A transport contingency fund will be made available to the TRG to be used if necessary, to implement any further mitigation measures and remedial actions." Do you agree with this analysis and the suggested approach to any necessary mitigation?
	Response	SCC do not agree with the conclusion that mitigation is not required on this corridor. SCC recognises that issues along this corridor are both pre-existing and worsened by general background growth, but that these issues will be further exacerbated by Sizewell C traffic. In particular, the Applicant's modelling, for which there is inherent risk within the results, has identified that the increase in traffic will result in the following impacts:
		a) In the early years average delay per vehicle will increase by 3–2 to 5 seconds and total delays on the corridor by 24 27 to 43 47 hours as a result of Sizewell C traffic. North to south journey times along the entire length of the corridor would increase by between 1 and 18 23 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under c), there are notable significant impacts of delay in specific location.
		b) For Peak Construction, a number of scenarios have been modelled, but average delay per vehicle would increase by between 57 and 1311 seconds and total delay would increase between 5667 and 152133 hours as a result of Sizewell C traffic. North to south journey times would increase by between 91 and 62 seconds depending on the hour and direction as a result of Sizewell C traffic. However, as noted under d), there are notable significant impacts of delay in specific location.
		c) Some examples of noticeable impacts in the Early Years scenario include the following: o An approximate 17_metrein increase in the queue length on the A12 north approach to the A12 / A1214-B1438 roundabout.

 An approximate 4329 metremin increase in the queue length and 23 second increase on journey time on the Foxhall Road approach to the A12 / Foxhall Road roundabout. An approximate 30 metres increase in the queue length on the A12 South approach to the A12 / Barrack Square roundabout. An approximate 24min-25 metres increase in the queue length on the Barrack Square approach to the A12 / Barrack Square roundabout. Some examples of noticeable impacts in the Peak Years (1,000 HGVs) scenario include the following: An approximate 113_minetre increase in the queue length and 16 second increase in journey time on the A12 south approach to the A12 / B1438 roundabout. An approximate 76_metrein increase in the queue length and a 37 second increase in journey time on the A12-B1079 eastsouth approach to the A12 /
B1079 roundabout. An approximate 82_metrein increase in the queue length on the A12 north approach to the A12 / A1214 roundabout. An increase in travel time of 19 seconds on the A12 south approach to the A12 / A1214 roundabout. An approximate 104metrein increase in the queue length on the Anson Road approach to the A12 / Anson Road roundabout An approximate 28 second increase in delay at the Eagle Way approach and a 38 second increase in delay at the Anson Road approach to the A12 / Anson Road roundabout. An approximate 91_metrein increase in the queue length on the A12 north approach to the A14 / A12 Seven Hills roundabout e) Although the methodology and therefore the outputs of the environmental assessment of road traffic have not been agreed, there are a number of locations along the corridor where the Applicant has identified a Major Adverse impact on Fear and Intimidation.
e) Although the methodology and therefore the outputs of the environmental assessment of road traffic have not been agreed, there are a number of locations

ExQ1 Question to:	Question:
EXQ1 QUESTION to:	f) Outside of the impacts identified above, which are averages, there are the less quantifiable impacts associated with reduced capacity and increased journey times associated with AILs and increased incidents.
	These impacts will result the following:
	 a) Negative impacts on the Suffolk economy, including on tourism, as a result of increased journey times (real and perceived); b) Reduced resilience along the corridor; c) Negative impacts on road safety as a result of increased congestion and driver frustration; d) Increased severance along the corridor; and e) Reduced vulnerable road user amenity along the corridor, particularly for pedestrians
	on the A12 at Woodbridge, and cyclists along the corridor.
	While large vehicles cannot deviate from the A12 or B1122, significant delays or disruption on this route will displace light vehicles to other routes such as the A1152/B1069 or B1078 preferable for workers. This may then result in additional impacts elsewhere.
	Notwithstanding the comments made on the modelled results, the modelling within the Transport Assessment relies on the assumption made regarding the volumes of construction traffic using the network particularly during peak hours. For example, the assumed shift pattens for workers places most journeys outside peak hours, and the number of peak hour HGV movements are currently not proposed to be capped. SCC considers this a significant risk and is requesting suitable monitoring and controls to ensure that the theoretical numbers assumed in the modelling are not exceeded. See LIR [REP1-045].
	SCC are preparing a bid for funding improvements to the A12 corridor east of Ipswich. These are primarily to support local growth over and beyond the duration of the Local Plan but would reduce delays and mitigate some of the impacts resulting from SZC. SCC as the local Highway Authority expects the Applicant to provide a proportional financial contribution towards Major Road Network (MRN) improvements, to mitigate Sizewell C's impacts on capacity, economic impacts of congestion, impacts on fear and intimidation and road safety along this part of the A12.

ExQ1	Question to:	Question:
		The economic impacts of congestion as a result of Sizewell C construction traffic for this corridor is evidenced by a high-level assessment by Aecom commissioned by SCC, which is submitted as SCC Appendix to ExQ SE.1.42 . Accepting the limitations of this assessment in terms of it not being able to provide an exact prediction of the economic impact, SCC considers that the assessment clearly indicates a significant negative cost on the economy for the A12 corridor between Seven Hills and A1152 Woods Lane as a result of increased congestion from Sizewell C construction traffic. It should be noted that these calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The identified range of the economic impacts based on the high level assessment method needs to be considered alongside the other impacts on this corridor, and supports the case for Sizewell C to provide a proportionate contribution towards the MRN improvements.
		The proposed MRN improvements may also make the A12 a more attractive route in terms of journey time and reliability for workers than cross country routes such as the B1078, thus may reduce the impact of Sizewell C on these routes.
		If the MRN bid is unsuccessful the LHA wil be looking to secure localised highway improvements funded by the Applicant to mitigate the specific SZC transport impacts on the A12 corridor.
		SCC considers that the Applicant needs to contribute to the mitigation as suggested above, and disagrees that reliance on the contingency fund to provide mitigation would be appropriate in this case. If mitigation was reliant on the contingency fund, the mitigation would be reactive, i.e. an impact occurring would trigger a need for mitigation which would at that point still need to be designed and delivered. Thus, mitigation on the A12 corridor would only be delivered after the impact or would not be possible to deliver it due to the combined impact of construction traffic and disruption of the construction of the mitigation itself.