



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 5 – 23 July 2021

Written summary of oral case

ISH 2 Traffic and Transport, 7 July 2021

Issue Specific Hearing 2 Traffic and Transport

Agenda item	East Suffolk Council
<p>1. Introductions</p>	<p>Speaker on behalf of East Suffolk Council (ESC)</p> <p>Andrew Tait QC</p> <p>East Suffolk Council (ESC) usually defers to and supports Suffolk County Council (SCC) as Transport Lead except where detailed below.</p> <p>There are matters incorporated below that were not specifically raised at the ISH but that ESC consider may be of help to the Examining Authority.</p>
<p>2. Freight Management Strategy Capacity and delivery of:</p> <ul style="list-style-type: none"> • Movement of freight by rail • Movement of freight by sea • Movement of freight by road • Movement of freight by Abnormal 	<p>Overall ESC position: ESC is supportive of the transport strategy being proposed provided it can be delivered and the noise and air quality issues addressed. We support use of rail to take HGVs off road, but significant concerns remain with regards to noise impacts particularly overnight for residents. (2.23, 15.45, LIR [REP1-045]).</p> <p>Movement of freight by rail “As there is not enough capacity on the rail network overnight to operate the fifth train, it would need to run during normal operational hours. This may require the cancellation of a pair of passenger train services between Lowestoft and Ipswich”. (para. 4.5.10, 8.5 Consolidated Transport Assessment [REP2-045]) ESC would strongly object to this and have consistently encouraged the rail industry to free up the existing flask path (runs every morning, reserved by Nuclear Decommissioning Authority), to enable the passenger service to use it, enabling an hourly “clock face” timetable. Further restrictions on passenger service would be strongly resisted. (18.63 – 18.71 LIR [REP1-045]).</p> <p>Rail Freight – Noise and Vibration</p>

<p>Indivisible Loads (AIL)</p>	<p>ESC has significant concerns regarding the impact of noise and vibration on sensitive receptors from night rail freight associated with Sizewell C. These were not discussed at the hearing as the ExA indicated that matters relating to noise, vibration and air quality were not appropriate for this ISH. ESC’s concerns in relation to noise and vibration associated with Sizewell C Rail Freight are set out in the LIR [REP1-045] at 18.54 – 18.86.</p>
	<p>Movement of freight by sea</p> <p>ESC is supportive of aspirations to increase the ability to move a higher proportion of freight by sea through the use of an extended permanent beach landing facility and a new temporary beach landing facility. There are implications with regards to beach access and public rights of way during construction and operation of both Beach Landing Facility’s that are being worked through with the Applicant, and we are satisfied that these discussions are progressing positively. Safety needs to be assured through the use of the conveyor on the temporary BLF and there are coastal related aspects that will be discussed in greater detail at ISH6.</p>
	<p>Movement of freight by road</p> <p>ESC defer to SCC as local highway authority on the majority of road related input. We accept that the most sustainable form of freight management strategy that is achievable appears to be a mix of road, rail and sea. However, there are challenges with rail that will need to be addressed. Therefore, a balanced approach to the solution will be necessary to ensure that local communities are not disadvantaged by the ultimate mix.</p> <p>Road Freight – air quality</p> <p>ESC is in discussion with the Applicant as to air quality impacts and the commitments that should be secured in the Code of Construction Practice and the appropriate monitoring and mitigation measures. These were not raised at the hearing as the ExA indicated that air quality was not an appropriate topic for this ISH. (Paras 19.1, 19.14, 19.15, 19.30 LIR [REP1-045], 8.11 Code of Construction Practice Version 3 Part B Table 4.1 and Part C Table 4.1. [REP2-056] and 8.7 CTMP Sections 4.4.17, 4.4.45, 4.4.46 [REP2-054].</p>
	<p>Movement of freight by Abnormal Indivisible Loads (AIL)</p> <p>ESC understands that the undertaker will need to transport AILs to the site. The permanent beach landing facility is proposed to be used for the biggest AILs but there will be other AILs that will be transported by</p>

	<p>road. ESC defers to SCC and Suffolk Police to provide detailed commentary on how they expect this to be managed. Concerns with regards to the potential Economic Costs of Congestion are under discussion with the Applicant (Economic Development S106 discussion with the Applicant).</p>
<p>3. Transport Strategy relating to Associated Development Sites</p> <ul style="list-style-type: none"> • Two Village Bypass – implications for possible Four Village Bypass • Freight Management Facility – Alternatives and access arrangements • Sizewell Link Road – Transport consideration of alternative routes, timing of delivery 	<p>Overall ESC position ESC supports the 2 major new road links – Two Village Bypass and Sizewell Link Road. We note SCC requests for further enhancement to the highway network, including on the A12 from Seven Hills to Woods Lane, Melton (2.30 SCC’s WR [REP2-189]). ESC is supportive of these works but seeks further evidence and detail from SCC on the measures that would be required – we understand that this will be made available in the next few weeks to ESC.</p> <p>Two Village Bypass – implications for possible Four Village Bypass ESC defers to SCC to provide the detail on acceptability of a Two Village Bypass. ESC has previously supported SCC in its earlier aspirations and proposals to achieve a Four Village Bypass.</p> <p>ESC supports the chosen route of the Two Village Bypass. SCC is responsible for assessing implications arising from road noise.</p> <p>Freight Management Facility – Alternatives and access arrangements ESC defers to SCC as Highway Authority in this matter, but we share concerns with regards to the potential that HGVs from the east on the A14 (Felixstowe) may not travel through the Seven Hills roundabout to access the Freight Management Facility.</p> <p>Sizewell Link Road – Transport consideration of alternative routes, timing of delivery and legacy benefits ESC recognises that there will be a two-year gap between the commencement of the project and delivery of the Sizewell Link Road. ESC considers that the Link Road is suitable to minimise impacts on the B1122.</p> <p>ESC consider that the route of the Sizewell Link Road is acceptable and has seen no evidence of a preferable alternative route. It considers that it would facilitate an important benefit in promoting the B1122 as a pedestrian and cycle friendly route once it becomes bypassed by the Sizewell Link Road.</p>

<p>and legacy benefits</p> <ul style="list-style-type: none"> • North and South Park and Ride sites – size and modelling coverage 	<p>ESC agrees with the Applicant that the Sizewell Link Road should be permanently retained post-construction as there is a legacy advantage to its retention to serve the Sizewell A, B and C stations and for outages and other developments in the vicinity including onshore substations serving offshore windfarms. Its retention enables the majority of the existing B1122 to be re-purposed from an HGV route to a pedestrian and cycle friendly route from Sizewell to the north. Furthermore, the removal of the Link Road would result in additional environmental impacts which ESC do not consider can be justified. (16.93 – 19.96 LIR [REP1-045] ESC Comment on WRs [REP3-060] and Ongoing transport discussions on [REP2-045]).</p> <p>The Applicant states “The Sizewell link road would remove nearly all traffic from the B1122 and would reduce collisions.” (p. 32 8.5 Consolidated Transport Assessment [REP2-045]). ESC does not consider this to be correct for the mile at the west end, from the Yoxford roundabout to the drop-down link at Middleton Moor. ESC has concerns about HGVs on the narrow country road. However, ESC is engaged in positive discussions with SCC and the Applicant on the potential opportunities for promoting the B1122 as a pedestrian and cycle friendly route and for an alternative route to the western end of the B1122 to provide a safer route to Darsham rail station.</p>
	<p>North and South Park and Ride sites – size and modelling coverage</p> <p>The percentage of Electric Vehicle Charging points provided at the park and ride sites in the application is 5% + 5% passive provision. ESC (and SCC) consider that this is too low and should be closer to 20% + 25% as per SCC Parking standards. This is under discussion with the Applicant. (4.7.15 Construction Worker Travel Plan [REP2-055]).</p> <p>ESC is encouraging the Applicant to commit to using ultra-low emission buses or electric buses to reduce the impact on local air quality and to promote the use of sustainable transport on all park and ride and bus routes during the construction phase.</p>
<p>4. Transport Assessments approach and modelling</p>	<p>Early years traffic modelling</p> <p>ESC (with SCC as lead) has agreed the approach to the traffic modelling in the Statement of Common Ground (SoCG). (p.151-152, TM01, TM02 SoCG [REP2-076]).</p>

<ul style="list-style-type: none"> • Early years traffic modelling • Seasonal traffic effects • Buses • Park and Ride sites traffic modelling 	<p>The gravity model is only an estimate and the potential for more or less condensed distribution of the workforce will have implications on the transport network. (15.52 LIR [REP1-045]).</p> <hr/> <p>Seasonal traffic effects ESC primary concern with regard to seasonal traffic effects is the potential impact it may have on tourism. The Applicant has sought to re-assure that shift patterns will take into account potential additional movements such as during the summer months on Friday and Sunday, during particular events, Latitude, Aldeburgh Food and Drink Festival etc, and we expect ongoing conversations during the construction phase to manage seasonal traffic effects. The Tourism Fund (the subject of discussion at ISH4) will help to mitigate some of the tourism related impacts through marketing strategies etc.</p> <hr/> <p>Buses ESC welcomes the flexible approach the Applicant proposes with regards to fluidly managing bus movements on a demand and supply basis in the early years in order to mitigate the risk of unauthorised park and rides appearing that require enforcement action. This will also, it is hoped, reduce the potential for fly-parking in the District. We would welcome the use of electric or hydrogen powered buses.</p> <hr/> <p>Park and Ride sites traffic modelling ESC are satisfied with the locations chosen for the southern and northern park and ride. Subject to the right detail under the discharge of requirements with regards to landscaping, lighting, design, we have no specific concerns. (5.4, 15.87, 15.90, LIR [REP1-045]).</p>
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