



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 5 – *23 July 2021*

Written summary of oral case

ISH 3 Traffic and Transport, 8 July 2021

Issue Specific Hearing 3 Traffic and Transport

Agenda Item	East Suffolk Council
1. Introductions	<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>
3. Monitoring and Control Mechanisms for Traffic and Transport <ul style="list-style-type: none"> • Early Years controls in the DCO • Construction Traffic Management Plan • Construction Worker Travel Plan • Traffic Incident Management Plan • Operational Travel Plan 	<p>ESC supports SCC, as Chair, in having the casting vote in the Transport Review Group.</p>
	<p>Early years controls in the DCO</p> <p>ESC defers to SCC as local highway authority. We support their suggestions for caps etc until the Associated Development is up and running – that includes Green Rail Route, BLFs and the road schemes.</p>
	<p>Construction Traffic Management Plan</p> <p>ESC agreed with points made by SCC.</p> <p>With relation to air quality, ESC is satisfied that air quality impacts from road freight can be satisfactorily managed through a commitment that has been made by the Applicant in CTMP Rev. 2 to a minimum proportion of the lowest emitting HGVs, referred to as Euro VI. However – there is still ongoing discussion around monitoring and management of this commitment and ESC is concerned that until those measures are agreed, there remains a risk to air quality within the Stratford St Andrew Air Quality Management Area</p>

	<p>(AQMA). ESC would welcome the opportunity to discuss all aspects of air quality at a future ISH. (CTMP Sections 4.4.17, 4.4.45, 4.4.46 [REP2-054]).</p> <p><u>“9.5.4 and 9.5.13 and 9.5.14: Contingent Effects Fund [Z] will be available to be drawn down by the TRG in the event that significant adverse transport effects arise that were not mitigated through the DCO affecting the road links or junctions identified in Annex [X] to the Deed of Obligation” (Doc Ref. 8.17(C)[REP2-054]).</u></p> <p>These effects are referred to as ‘Contingent Effects [Z].’” where Z = 1 and 2. It is a concern that only the listed road links or junctions are eligible for this fund as impossible to identify with complete certainty in advance.</p> <p>Construction Worker Travel Plan</p> <p>In relation to the peak construction workforce in 3.1 of the CTMP there is an assumption of the accommodation campus being in place by the time of peak construction in order to achieve mode share target. This reinforces the need to have a specific requirement for the campus to be in place at an identified trigger point (ESC’s suggestion is that the campus should be complete by the time 7000 workers are engaged in construction activity). ESC considers that this should be secured in the DCO.</p> <p>Traffic Incident Management Plan</p> <p>ESC agreed with points made by SCC at the hearing.</p> <p>In the Traffic Incident Management Plan (TIMP) the Incident Management Area (IMA) – is defined as the A14 between j.51 for A140 and j.58 for A12. ESC consider it should extend further east to Felixstowe as incidents could affect the Port of Felixstowe. (TIMP [REP2-053] and 22 in HE’s [REP3-071]).</p> <p>The TIMP states “During Operation Stack, SZC Co. would route Sizewell C HGVs direct to the main development site, with no HGVs routing via the freight management facility in order to relieve pressure on Old Felixstowe Road. This would continue until SZC Co. is notified that the port is open”. ESC has concerns about how the DMS would manage the HGVs if there were AILs scheduled. Operation Stack can last days</p>
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	<p>rather than hours. However, Operation Stack is rarely put in place so this may not be a frequent occurrence. (5.2.27 in the TIMP [REP2-053]).</p> <p>Operational Travel Plan</p> <p>ESC agreed with points made by SCC.</p> <p>ESC considers the Sizewell Link Road to play a key role during operation particularly in providing a permanent HGV route to Sizewell A, B and C, for providing an alternative to the B1122 for workers, and for providing an alternative route during outages at Sizewell B and C.</p> <p>ESC considers that there is the need for an increased number of EV charging points in the permanent operational car park.</p>
<p>4. Consideration of local transport impacts</p> <ul style="list-style-type: none"> • Difference in proposed mitigations identified in the Transport Assessment and those required by the Councils • Approach to assessment for impacts in Chapter 10 of the 	<p>Difference in proposed mitigations identified in the Transport Assessment and those required by the Councils</p> <p>ESC agreed with points made by SCC.</p> <p>B1122 cycling provision enhancements - ESC promotes and supports an east-west link (Leiston/Aldeburgh to Darsham) (16.81, 16.95, 16.97 LIR [REP1-045]).</p> <p>Local Transport Impact and related issues outside of those listed - There will be substantial use of Non-Road Mobile Machinery (NRMM) at the different construction zones. ESC will be seeking to ensure that NRMM conform to the most up to date Stage V emissions standards. Stage IV plant may be acceptable in some settings, but Stage V plant may be needed to ensure minimisation of PM emissions and to ensure that emission limits apply to NRMM with power output above 560 kW. In the event that Stage IV / V plant (as appropriate) is not available, ESC considers that plant with the highest available NOx and PM emissions standards should be used, and a cap on the maximum proportion of non-Stage IV / V plant should be</p>

<p>Environmental Statement</p> <ul style="list-style-type: none"> • Consideration of cumulative impact on local roads of the Proposed Development and the ScottishPower applications 	<p>specified. ESC is seeking amendments to the CoCP to reflect these considerations (para. 19.21 LIR [REP1-045]).</p> <p>Proposed local work in Little Glemham – ESC wish to see air quality monitoring carried out for a minimum of six months before and 12 months during operation of the pedestrian crossing to ensure air quality is not significantly negatively affected in view of the baseline traffic volumes on the A12 at this point, additional traffic resulting from the proposed development, and proximity to Stratford St Andrew AQMA. (Ongoing meetings with Marlesford / Lt Glemham). Ongoing discussion is taking place with the Applicant regarding a review process for the crossing in the event of air quality being adversely affected.</p> <p>Approach to assessment for impacts in Chapter 10 of the Environmental Statement</p> <p>ESC agreed with points made by SCC.</p> <p>ESC is satisfied that the assessment methodology in relation to rail noise predictions and air quality is to appropriate industry standards (AQ2, NV30, SoCG [REP2-076]).</p> <p>Consideration of cumulative impact on local roads of the Proposed Development and the ScottishPower applications</p> <p>ESC agreed with points made by SCC.</p> <p>Air Quality: SPR have committed to a minimum percentage of Euro VI HGVs for the construction of offshore wind farms and associated onshore infrastructure at East Anglia One North and East Anglia Two. Considered cumulatively with the Applicant’s minimum percentage of Euro VI HGVs, ESC considers that there will be no significant cumulative impact on the Stratford St Andrew AQMA prior to the Two Village Bypass being available for use.</p>
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	Ongoing monitoring of AQ in this area will be required in the Early Years prior to the Two Village Bypass opening to ensure this.
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