

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 2 (7 July 2021) – (ISH2) Traffic and Transport
Post Hearing Submissions including written summary of Suffolk County
Council's Oral Case**

Suffolk County Council Registration ID Number: 20026012

Deadline 5

23 July 2021

Issue Specific Hearing 2 (7 July 2021) - (ISH2) Traffic and Transport

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Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
	These Post Hearing Submissions include a written summary of the Oral Case presented by Suffolk County Council (SCC). They also include SCC's submissions on all relevant Agenda Items, not all of which were rehearsed orally at the ISH due to the need to keep oral presentations succinct. The structure of the Submissions follows the order of the Agenda Items but within each Agenda Item, the Submissions begin by identifying the main points of concern to SCC and then turn to more detailed matters.	
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 – Freight Management Strategy		
Capacity and Deliverability:	<p>SCC's aim is to encourage the applicant to show they are complying with NPS-EN1 to secure sustainable patterns of transport (NPS EN-1 5.13.9) and that water borne or rail transport is preferred over road transport at all stages of the project, where cost effective (5.13.10).</p> <p>In response to SCC's, as well as other Interested Parties', concerns on the freight management strategy, the Applicant has submitted the 'preferred strategy'. Firstly, as set out at paragraph 15.35 of our LIR, SCC welcomed the principle of increasing the amount of materials transported by sustainable modes and would therefore support the 'preferred' freight strategy over the 'integrated' strategy being considerate of the impacts of the different modes of transport. SCC retains the view that the modal split of transport modes in the preferred strategy should be regarded as achievable targets (not ceilings) and every effort made to exceed those for delivery by marine or rail. However, as set out at paragraph 15.50 of our LIR, a full overview of the required materials and the achievable</p>	<p>Suffolk County Council Relevant Representation [RR-1174]</p> <p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p> <p>NNB Generation Company (SZC)</p>

	<p>modes of transport for these materials has not been provided, and therefore SCC cannot conclude whether an even greater proportion of materials could be transported by sustainable modes. SCC sees no reason why the FMS [AS-280] cannot include a commitment to maximise the use of sustainable modes above 60% so far as practicable. That would demonstrate that 60% is not a ceiling but would also recognise that any measures to achieve a greater proportion than 60% will be tempered by what is practicable.</p> <p>We understand that further details regarding the materials strategy will be provided by the Applicant during the examination at D5. We will examine any information provided and comment as appropriate. We hope this would be sufficient to resolve matters of detail raised by SCC, provide forecast of material delivery to allow monitoring and clarity of how the separate elements of the FMS work together and are delivered at the appropriate time.</p> <p>As an example, SCC questions some of the contents of Table 15.3 in the Applicant's response [REP3-044] to our LIR. Further details on where reinforcement and tunnel segments can be manufactured locally are requested. The rock armour required for sea defences is not included in 'others'. In the Applicant's response to EXA Q1 (REP2-100) TT.1.0 a total of 920,00 tonnes aggregate will be sourced from one or more of the following:</p> <ul style="list-style-type: none"> • Hanson Birch Quarry – road access only • Tarmac Stanway Quarry – no direct rail access but sidings at Marks Tey used • Barham Sand and Gravel Quarry – rail linked <p>As can be seen not all are rail served as suggested in the table and the comments to TT.1.1 <i>'The current forecast assumes all concrete aggregate and 50% of the fill aggregate are imported by rail with the remaining 50% of fill aggregate imported by marine. This results in rail representing circa 46% of imports, marine accounting for circa 14% and road imports remaining at circa 40%.'</i></p> <p>Hinkley Point C Freight Management Strategy Oct 2011 (REP3-045) paragraph 7.1.3 estimated the project required 6.4 million tonnes materials (4.1mt (64%) by road 2.3mt (36%) by water). SCC would welcome for the Applicant to provide data that shows how effective this has been and whether the targets have been met.</p>	<p>Limited 'Deadline 2 Submission – 9.11 Response to the Examining Authority's First Written Questions' [REP2-100]</p>
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	<p>As set out at paragraph 15.36 of our LIR [REP1-045], SCC considers that robust caps and / or monitoring is needed to help to ensure that the development achieves its modal split aims. We would support monitoring of the modal split of freight, as set out in our Response to TT.1.21 at Deadline 3 [REP3-084] to ensure that the freight management strategy aspirations are realised.</p> <p>SCC considers that it would be very helpful to include profiles of HGV movements and numbers of workers within 8.4 Implementation Plan Update - Revision 2.0 [REP2-044]. This would assist in identifying potential risks, setting suitable controls and assisting future monitoring to ensure key assumptions in the modelling remain valid.</p> <p>SCC seeks clarification on whether either of the two issues below have an impact on the forecasts within the freight management strategy?</p> <ul style="list-style-type: none"> Phase 2 Bulk Earthworks. SCC notes that this has been delayed from 12 months after FID (V1.0) to 24 / 27 months (V2.0). This now enables completion of the highway, marine and rail improvements prior to commencement of this phase but the phase is compressed from 39 months to 27 months. The Implementation plan refers to 6.3 Volume 2 Main Development Site Chapter 3 Description of Construction dated 25/06/2020 (APP-184) which in turn refers to V1.0 of the Implementation Plan (APP-599) and table 3.2 and 3.3 to the previous quantities of materials (i.e. 10.1 million tonnes) rather than the 12.1 million tonnes in table 2.1 of the Freight Management Strategy (AS-280). <p>Clarity is also sought regarding HGV movements to and from the ALR road along the B1122. The applicant states in 5.3.2 of the CTMP (REP2-054) that all associated development sites will be served off the A12 corridor, but this appears impractical for the SLR. In the ISH the applicant referred to 700,00 tonnes of fill that was to be transferred between the associated sites and the main sites. It is not clear how these movements have been assessed nor if this material is included in the 12.1 million tonnes considered in the revised freight management strategy (AS-280).</p>	
Capacity and Deliverability: Movement of Freight by Rail	<p>Chapter 31 of the LIR [REP1-045] includes identification of 'Implementation of Delivery Risks' recognising that all projects, but particularly one of this level of complexity comes with risks to programmes. Table 31 of the LIR includes a summary of those risks; these include:</p>	<p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p>

	<ul style="list-style-type: none"> • Failure to achieve the rail or marine facilities. • Delay in delivery of park and ride sites. • Delay in delivery of Sizewell Link Road and/or Two Village Bypass • Delay in delivery of accommodation campus. • Workforce numbers. <p>As set out at paragraph 15.4 of our Joint LIR [REP1-045] we remain concerned as to whether the required mitigation measures are deliverable at the time required by the Project to mitigate its impact on the highway network. Those concerns are exacerbated by the lack of any clear and enforceable commitments by the Applicant to deliver the key mitigation measures identified in the Implementation Plan in step with key stages of the project (this aspect was discussed further at both ISH1 and ISH3 and the Post Hearing Submissions for those events provide further detail on SCC's position. This is one of the many reasons why SCC has sought comprehensive controls on the development's associated traffic.</p> <p>As set out at paragraph 15.42, SCC welcomes the ambition to provide additional rail insofar as it takes HGV movements off the highway, but that the impacts of noise and vibration from night-time rail movements on local residents' needs to be clearly understood to avoid just transferring the harm. We agree with ESC that noise and vibration mitigation is fundamental to the acceptance of overnight rail movements but defer to ESC for detailed comments on this matter.</p> <p>As set out in SCC's response to NV.1.13 at Deadline 3, clarification is still being sought on the deliverability of noise mitigation. We understand this may be through requirement 25 Rail Noise although the latest version of the DCO [REP2-013] only refers to works no.4 which does not include the ESL. SCC defer to ESC on the matter of noise whilst noting this is of significant concern to that authority. It reinforces the SCC position that movement of freight during day is a better option but recognises at this time the opportunity to deliver this and meet the Applicant's deadlines has passed.</p>	<p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 8.4 Implementation Plan Update - Revision 2.0 [REP2-044]</p> <p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 8.8 Construction Worker Travel Plan - Revision 2.0 [REP2-055]</p> <p>NNB Generation Company (SZC) Limited 'Deadline 2 Submission – 9.11 Response to the Examining Authority's First Written Questions' [REP2-100]</p> <p>Network Rail 'Deadline 2 Submission – Response to the ExA's Written</p>
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	<p>SCC's views on the desirability of daytime rail transport, which would significantly reduce impacts on communities is documented in its Written Representation [REP2-189] response to the SZC consultations and our Deadline 3 Response [REP3-084] to NV.1.94. It does accept that unless there is significant delay to the proposed construction programme the infrastructure to support this is unlikely to be delivered in time.</p> <p>As set out at Paragraph 15.35 of the LIR [REP1-045], there remains a lack of clarity on the deliverability, timing and impacts of the proposals of additional train movements, as set out in the Applicant's 'Preferred' rail option. At Deadline 2 the Applicant responded to Examining Authority Question G.1.51 [REP2-100] setting out the number of processes that are needed to be completed with Network Rail, the Freight Operating Company and the Office of Road and Rail, and like any workstream with multiple elements this includes some inherent risk to programme as a result. In our Deadline 3 Response [REP3-084], SCC identified that no timescales for these legal agreements were included and whether Network Rail's new more rapid delivery process PACE might provide a means to fast track the programme.</p> <p>In the Applicant's response to HW.1.19 [REP2-100] it is identified that mitigation to reduce risk at level crossings on the Sizewell C Branch Line will be pursued by Network Rail. At response to HW.1.27 Network Rail [REP2-157] identify that they will ensure works on level crossings will be delivered before freight trains start to operate and it remains unclear how these works, both for the Branch Line and the East Suffolk Line, relate to the overall programme as indicated in SCC's comments on TT.1.5 at Deadline 3 [REP3-084], for instance whether they will require public consultation. SCC also raised concerns in our Deadline 3 Response [REP3-084] on the Applicant's Response to Examining Authority Question G.1.46 [REP2-100] and our need to see a full programme of work for the East Suffolk Line and Leiston Branch Line.</p> <p>SCC would seek clarification on how the issues raised by NR in HW.1.19 (REP2-157) and concerns raised by SCC in Paragraph 15.44 of the Joint LIR [REP1-045] regarding the East Suffolk Line (ESL) will be addressed by the applicant. While recognising the Applicant and NR are working together towards resolving the issues raised by NR regarding safety of level crossings (HW.1.19 and HW.1.27) on the ESL have not been resolved. SCC is concerned that resolution of this matter together with delivery of any signalling or crossing improvements may delay rail haulage to Sizewell C. SCC notes that improvements or mitigation (other than potentially noise) on the ESL are not secured within the</p>	Questions' [REP2-157]
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	<p>DCO nor included within the summary timetable provided to G.1.51. The agreements referred to in TT.1.3 only relate to the Sizewell Branch Line, again not the ESL. Thus, the rail works on the ESL are not aligned with those on the Leiston Branch, LEEIE or GRR. Requirement 25 is acknowledged as a possible mechanism to deliver mitigation for the noise impacts related to rail movements at night. While we will defer to ESC to comment on this matter it is noted that any mitigation works will need to be completed before freight movements commence as little spare line capacity will remain (i.e. 24-hour usage). This may also impact routine maintenance.</p> <p>Should the delivery of rail infrastructure and rail movements not meet the current timeline (Q4 Year 1 or 2023 for the Branch Line and Other Rail Improvement Works and Q1 Year 2 and/or 2024 for the Green Rail Route), as set out in updated Implementation Plan at Deadline 2 [REP2-044] and NR summary timetable response to G.1.51 [REP2-157], then the risk exists that the required freight will need to be transported to site by other modes (most likely road), with associated prolonged impacts to Suffolk residents.</p> <p>To ensure that the potential for additional HGV movements does not materialise; SCC would seek that there are adequate controls, which can be explored further at Agenda Item 3 of ISH 3, and were outlined at our Deadline 3 Response [REP3-079] to the submissions at Deadline 2 of the Construction Traffic Management Plan [REP2-054] and the Construction Worker Travel Plan [REP2-055].</p> <p>While SCC accepts that the risk to passenger services is reduced by restricting rail freight to night-time movements it is aware of NR concerns stated in NV.1.90, NV.1.94 (REP2-157) and the daytime 'flask train' path (SE.1.43).</p>	
Capacity and Deliverability: Movement of Freight by Marine	<p>Should the delivery of the secondary beach landing facility not meet the current timeline (Q2 Year 3 / Q2 2025), as set out in updated Implementation Plan set out at Deadline 2 [REP2-044], then the risk exists that the required freight will need to be transported to site by other modes (most likely road), with prolonged increased impacts on Suffolk residents.</p> <p>It is also noted that the use of sea delivery is seasonal. Acknowledging the potential of forward planning and the stockpiling there remains a risk that other modes of transport will need to be increased to deliver materials and AILs to site during the winter.</p>	Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]

	<p>To ensure that the potential for additional HGV movements does not materialise; SCC would seek that there are adequate controls and monitoring.</p> <p>As set out in our response to TT.1.10 at Deadline 3 [REP3-046] further information is sought on the variable nature of the tide and what potential exists for this to affect the amount of material that could be imported by marine, as we would like to see every opportunity for materials to be transported by marine taken up and so how this might link to more aspirational targets for the project.</p> <p>During the hearings, the Applicant misunderstood our request to secure a binding commitment to maximise use of marine freight by characterising it as a control. What we are suggesting is in fact a commitment to maximise the use of marine modes, subject to any qualifications which would be necessary to make it reasonable. Such an approach would not place rigid limits on the ability of the Applicant to use any other mode of freight or fetter their flexibility to deliver the project in the most suitable way according to the circumstances. However, it would require the Applicant to take practicable measures to maximise the use of the available BLF (temporary and permanent).</p>	
Capacity and Delivery of: Movement of Freight by Road	<p>As set out in REP3-084 in SCC's comments on the Applicant's response to TT.1.11, the HGV movement caps proposed by the Applicant provide the theoretical capacity for all of the 12.1m tonnes of freight materials required for the project to be delivered by road, without any need to use rail or marine modes. It is therefore critical that there are adequate and enforceable controls on the movement of freight by road to ensure that the Applicant does prioritise the delivery of freight by more sustainable modes.</p> <p>SCC would also seek further clarification on the Early Years cap of 300 HGVs, as it was set out during the ISH2 by the Applicant that this was a cap on HGV movements on the B1122 arising from all of the project's construction traffic (including to/from the associated development sites, and not merely HGV's to the Main Site as SCC had understood it, and whilst we welcome the Applicant's statements at ISH2, they are not currently reflected in the submitted documentation (see for example para 4.4.5 and 4.4.6 of the CTMP [REP2-054]) and we seek further clarification on this.</p>	<p>Local Impact Report (LIR) [REP1-045] (15.91)</p> <p>NNB Generation Company (SZC) Limited Additional Submission in relation to the Applicant's request for changes to the application and Additional Information - 8.18 Freight Management</p>

	<p>SCC remain concerned about the forecasting of the minimum number of HGVs, as shown at Plate 4.2 of the Freight Management Strategy [AS-280], which indicates exceedance of the Early Years cap of 300 HGVs in late 2023, and when this is compared to the completion of the Sizewell Link Road as set out in the Implementation Plan [REP2-044], which is not until the end of 2024. This implies more vehicles on the B1122 before the completion of Early Years. SCC are concerned about the total number of HGVs and AIL movements on the B1122 in the Early Years.</p> <p>Whilst there are a few locations where the capacity of the road network may cause some constraints for Sizewell C construction traffic (e.g. A12 around Woodbridge), overall it is more an issue of increased significance of the impact of that construction traffic on other users of the A12 corridor. The project will result in a substantial negative impact on the highway network, even with proposals for the second BLF and additional train deliveries: Impacts on severance, pedestrian delay, pedestrian amenity, fear and intimidation, driver delay, accidents and safety, noise and air quality, as well as carbon footprint (as set out in SCC's comments in REP2-517 on responses to TT.1.82). As a critical part of SCC's Major Road Network, the performance of the A12 is a key movement issue for SCC. SCC already has plans (as explained in REP2-517) to undertake a package of measures to improve the performance of the corridor (subject to funding). Whilst SCC recognises that the project is not the sole or the primary cause of the need for those interventions, it does consider that the Applicant should make a proportionate contribution to that package to assist in mitigating or offsetting its own impacts.</p>	<p>Strategy - Revision 1.0 [AS-280]</p> <p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 8.4 Implementation Plan Update - Revision 2.0 [REP2-044]</p>
<p>Capacity and Deliverability of: Movement of Freight by Abnormal Indivisible Loads</p>	<p>SCC noted at paragraph 15.69 of our Joint LIR that there are no controls proposed on total AIL movements and that there had been no quantified assessment of impacts and that the increase in abnormal loads would increase delays on the Suffolk road network at paragraph 15.102. Whilst there may be capacity on the highway network to accommodate AIL movements, SCC's concerns relate to the extent of the impact.</p> <p>An 'abnormal load' is a vehicle that has any of the following:</p> <ul style="list-style-type: none"> • a weight of more than 44,000kg • an axle load of more than 10,000kg for a single non-driving axle and 11,500kg for a single driving axle • a width of more than 2.9 metres 	<p>Local Impact Report (LIR) [REP1-045]</p> <p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 8.7 Construction Traffic Management Plan - Revision 2.0 [REP2-054].</p>

	<ul style="list-style-type: none"> • a rigid length of more than 18.65 metres <p>Special types vehicles are those which do not meet the C&U and AW Regs but can be used outside these rules under the authority of the <u>Road Vehicles (Authorisation of Special Types) (General) Order 2003</u> (STGO). Vehicles which do not comply with an STGO order can be used on the road if Special Orders have been issued by Highways England regarding abnormal loads not covered by C&U and STGO.</p> <p>Note that STGO Cat 2 and 3 movements i.e. >50000Kg (6 axles) are restricted to 30mph, and so for the B1122 might take in the order of 30 minutes to traverse it.</p> <p>Preferred high and heavy AIL routes are published by DFT. These were first published before the NPS water/rail borne policy came into force and have not been updated for improvements in infrastructure and hence do not replicate the current routes used in practice. HR100 from Lowestoft to Sizewell is generally as first described.</p> <p>Additional information on AILs was submitted at Deadline 2 by the Applicant including within the [REP2-054] Construction Traffic Management Plan (CTMP).</p> <p>SCC notes that all AILs will be required to be moved by road in before completion of the BLF in Q2 2025 (REP2-044) and also during the winter months when the BLF is unavailable. We also note that the police will not escort large abnormal loads in the night-time.</p> <p>The data provided in CTMP Table 3.2 (REP2-054) shows that around 80% of the AILs exceed 2.9m width and over 20% exceed 3.5m width. In 2.3.14 of Consolidated TA V4 (REP4-005) states B1122 approximately 6.0m in width. Thus, many loads wider than 2.9m loads will straddle the centre line, potentially requiring police escort and will prevent oncoming HGVs passing on parts of the B1122. The concern relates to the management of oncoming HGVs as well as associated delay. The Applicant noted in their oral submission that Suffolk Constabulary have successfully managed AILs along this route before, for example for deliveries relating to Sizewell B. However, it is one thing to successfully manage an AIL through this challenging route on an occasional basis and another to manage 125 such journeys per month for two years. Data from Hinkley Point C (see paragraph 3.3.23 of the Construction Traffic Management Plan [REP2-054]) suggests that the peak day for AILs</p>	<p>Suffolk County Council Deadline 3 Submission - Comments on responses to ExA's Written Questions (ExQ1) [REP3-084]</p> <p>AILs https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide</p> <p>https://www.gov.uk/government/publications/preferred-routes-for-high-and-heavy-abnormal-load-movements</p> <p>https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf</p>
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	<p>was 26 journeys. This quantity of journeys, both in terms of the peak and the average over a sustained period, would cause significant traffic disruption. SCC indicated at ISH2 that such a journey could take up to 30 minutes as a slow moving AIL. As AILs are not included in modelling, this disruption is not assessed in the ES and the traffic impact of these journeys is therefore unknown. In the ISH we noted that the applicant accepts that the B1122 is nominally 6.0m in width (REP2-045) but that a significant number of AILs (table 3.2 in REP2-054) will exceed 2.9m and intrude into the opposing carriageway.</p> <p>The number of such wide loads will also make temporary traffic management within associated development sites on the highway difficult. CTMP Table 3.3 also shows that the peak in AIL movements for HPC was during the first year, for SZC this would be prior to the BLF being open for use.</p> <p>SCC has commented on the delays resulting from AIL movements in the LIR (REP1-045) at paragraph 15.69 and in our Deadline 3 [REP3-084] response to TT.1.8 where we set out that SCC welcomed the provision of additional information on AIL movements, as set out at Table 3.3; however, that there is no quantification of the relative level of impact on the highway network of an AIL based on its width. It would be beneficial to have an understanding of the expected level of delay that an AIL might cause based on its width as per our comments at (REP1-045).</p> <p>As set out in our Deadline 3 Response we noted that Paragraph 7.2.2 of the CTMP sets out that the Applicant will <i>'seek to utilise spare capacity within the permanent BLF to deliver some of the construction AILs by sea'</i>. SCC would request further clarity on the process that would take place here to ensure that all available capacity is used to move the temporary construction AILs by marine where reasonable to do so. It would welcome any measures proposed by the Applicant to secure dockside accommodation to store or consolidate large loads for onward shipment to the BLF.</p> <p>Specific issues regarding AIL movements such as the management of these loads crossing the Darsham and Middleton Level crossing have been raised with the applicant and are under discussion, as set out in our Response to TT.1.28 at Deadline 3 (REP3-083). We understand that a process is being developed to allow AILs to safely navigate the Middleton Crossing without stopping through use of communication between the escort and NR.</p>	<p>https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005390-8.10%20EA1N%20Outline%20Access%20Management%20Plan.pdf</p>
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	<p>It should be noted that roadworks on the B1122 during the early years period will impact AIL capacity on that route and all other traffic. All the works listed will require traffic management, either in the form of road closures or temporary traffic signals. Creation of safe working areas is likely to reduce the road to one lane i.e. @3.2m width. Where new roads are tied into the existing construction traffic will be required to use temporary road surfaces which may be thinner than the construction required to carry heavy loads or lack suitable edge restraint.</p> <ul style="list-style-type: none"> • Scottish Power Renewables footway improvements in Theberton (as shown at Annex 5 of the EA1N CTMP). • Sizewell Link Road potential sustainable transport improvements on the B1122 • Sizewell Link Road new roundabout with B1122. • Sizewell Link Road new junction at Title Road. • Sizewell Link Road tying in with B1122 at its eastern end. • The new main site roundabout junction. • B1122 Rail crossing. • Realignment of the B1122 junction with Lover's Lane. • New crossing of Lover's Lane. • Scottish Power Renewables accesses to Sizewell Gap (as shown at Annex 2 of the EA1N OAMP). <p>SCC is aware than the B1122 and many parts of the single carriageway sections of the A12 are not of modern design and have evolved over the years with ad hoc repairs and improvements. These roads are therefore more susceptible to damage form the extraordinary traffic necessary to deliver SZC. For this reason, SCC seeks regular surveys and maintenance interventions to keep these parts of the network serviceable.</p>	
Agenda Item 3 – Transport Strategy relating to Associated Development Sites		
Two Village Bypass – Implications for possible Four Village Bypass;	<p>As set out at paragraph 36.54 of the LIR, there have been long term aspirations to provide a four-village bypass, but that it has not been possible to achieve Government funding to allow this.</p> <p>In the strategic business case four routes were examined in detail</p>	<p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p>

	<ul style="list-style-type: none"> • LB5d was the preferred option. This route does not follow the alignment of the Two-Village Bypass except for a section immediately south of the A1094 junction (up to Foxburrow Wood) generally being further to the east. • LB5s follows the route of the Two-Village Bypass to a point just north of the River Alde. • SB5s and SB5d both follow the route proposed for the Two-Village Bypass. <p>SB5s and SB5d were not recommended for further appraisal in the strategic business case, offering a lower benefit than LB1d and did not adequately solve all the problems through the four villages. Although not included within the report a route to between the north end of Wickham Market Bypass and the A12 at Tinkers Brook Lane to the west of Marlesford and Little Glemham was considered as an option in earlier studies. A spur off the Two-Village Bypass to allow continuation of the Two-Village Bypass to the east of Little Glemham and Marlesford to the north end of the Wickham Market Bypass while possible in engineering terms would require a second crossing of the River Alde valley with the associated environmental impacts. This is summarised in [REP2-108].</p> <p>SCC will continue to seek support to bypass the remaining two villages (Marlesford and Little Glemham) as the four village bypass remains as a key transport issue in our Local Transport Plan (LTP1) but recognises that it is likely to be more difficult to get funding following delivery of a Two-Village Bypass.</p> <p>Whilst it would be physically possible to achieve a four-village bypass following delivery of a Two-Village bypass; the cost of the scheme would still be likely to require Central Government funding. The current methodology for assessing schemes tends to rely on benefits accrued from journey time savings, and the majority of the delay, for which benefits can be accrued making a scheme good value for money, is associated with the eastern section; that which is being bypassed. This would indicate that the business case for the western section of the scheme in isolation would be more difficult and on that basis less likely to be successful. However, you would need to undertake the relevant assessment work to confirm this position and we recognise that assessment methods can change over time.</p>	<p>https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/2011-07-06-Suffolk-Local-Plan-Part-1-lr.pdf</p> <p>https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/SEGway-Strategic-Case-Full.pdf</p>
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	<p>As set out at paragraph 16.51 of the LIR [REP1-045], SCC supports the two-village bypass as effective mitigation as well as providing strategic transport legacy by removing through traffic from the existing A12 through the communities of Farnham and Stratford St Andrew, as well as rerouting to avoid the constraint at Farnham bend. The bypass will also improve network resilience and safety, particularly at the A1094 junction.</p> <p>SCC considers that the Applicant's response [REP3-042] to our written representation [REP2-189] para 1.3 (not 1.30 as quoted) 2.24 and 2.25 has taken the comment that the Two-Village Bypass is sub optimal out of context. SCC's comments were clearly relating to the proposed Two-Village Bypass against the strategic goals of SCC i.e. SEGWAY and not SZC. Indeed, the paragraph goes on to state '<i>we (SCC) are of the view that the Two Village Bypass is considered the essential minimum mitigation for the construction traffic of Sizewell C, and is an important improvement to the current road provision, with legacy benefit for Suffolk.</i>' 2.25 further amplifies this position <i>with the absence of DfT funding rendering the SEGWay impossible, we are of the view that the Two Village Bypass is considered the essential minimum mitigation for the construction traffic of Sizewell C, and is an important improvement to the current road provision, with legacy benefit for Suffolk</i>'.</p> <p>At paragraph 16.53 of the LIR, SCC sets out that we considered the A12/ A1094 roundabout scheme a road safety improvement and at paragraph 16.54 that the proposed route was the 'least worst' option when considering impacts on Foxburrow Wood. Again, this has been taken out of context by the applicant in their response (REP3-044).</p> <p>In SCC's Deadline 3 Response to NV.1.49, SCC set out that we considered it imperative that all efforts are taken to mitigate adverse effects above LOAEL and to avoid significant adverse effects above SOAEL. In the case of the Two-Village Bypass this is of relevance to properties such as Mollets Farm and Farnham Hall. SCC note that concerns have been raised regarding the impacts of noise from the new road particularly the Two-Village Bypass on Mollets Farm and Farnham Hall (and associated dwellings). We presume this will be discussed at future hearings if not resolved in writing prior to that.</p>	
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<p>Freight Management Facility - Alternatives and access arrangements</p>	<p>At Paragraph 16.110 of the Joint LIR [REP1-045] SCC noted that we considered the provision of a Freight Management Facility was likely to lead to better management of freight vehicles on approach to the site.</p> <p>As set out at Paragraph 16.111 of the LIR, SCC identified that the proposed location of the FMF is considered to be acceptable in principle; however, that the Applicant has not evidenced that this location is optimal in terms of managing HGVs particularly in the case of closures of the Orwell Bridge. SCC advised the Applicant in the pre-submission stage that potential alternative locations to the west of the Orwell Bridge, which could improve the site's ability to manage HGVs, should have been fully investigated.</p> <p>As noted at Paragraph 16.113 of the LIR, traffic impacts could have been reduced if a location had been identified which did not require multiple movements at the A14 / A12 junction.</p> <p>However, SCC note that the operation of the Freight Management Facility will be as much down to an effective processes and management through the Delivery Management System.</p> <p>Notwithstanding the comments above SCC accepts sole access to be off Seven Hills Roundabout but notes that this does increase movements on Seven Hills which is at times subject to delays (LIR para 16.112). Use of the slip off the westbound A14 as an alternative is not considered desirable due to the tight turn off the slip road although HE's views on this should be sought.</p>	<p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p>
<p>Sizewell Link Road – Transport consideration of alternative routes, timing of delivery and legacy benefits</p>	<p>SCC set out its view on the Sizewell Link Road in SCC's Written Representation [REP2-189] and as set out in our Deadline 3 Comments on the Applicant's response to Examining Authority's question TT.1.92 [REP3-084] we consider that the net legacy benefit of the Sizewell Link Road is very low, and so should be balanced against the ongoing cost of maintaining two parallel routes as well as the environmental harm caused by the physical presence of the retention of the Sizewell Link Road. The Written Representation sets out clearly that, based on the Applicant's Transport Assessment, at the completion of the site (assumed to be 2034), the traffic figures on the Sizewell Link Road return to a level that is far less significantly above the reference case.</p> <p>All new road infrastructure has to be a balance between the benefits achieved for the traffic using the route and the communities relieved from through traffic with the harm created for the</p>	<p>Suffolk County Council Deadline 2 Submission - Written Representation (WR)</p> <p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 9.11 Responses to the Examining</p>

	<p>environment. In this case, it is the view of SCC that, while traffic is at the high levels anticipated during the construction of the power station, the benefits of the road outweigh the environmental harm but that once traffic levels move to that for the operational phase, then the harm clearly outweighs the benefits. We do note that there are some benefits such as a well-designed route for AILs and HGVs besides removing lighter vehicles from Theberton.</p> <p>At Deadline 2, the Applicant submitted Appendix 5D [REP2-108] in their response to the Examining Authority's questions to address the selection of the route. SCC welcomes the provision of further explanation of the Applicant's route choice. Whilst SCC considers that no demonstrable 'best' solution emerges, it nonetheless acknowledges that the Applicant has made that choice and so formulated its proposals. SCC is focussing on the proposal on its own merits.</p> <p>In our Deadline 3 Response to AI.1.30 [REP3-084], SCC noted that based on the Applicant's assessment that the Sizewell Link Road offers considerably less benefit in shortening journey times and journey distance for the majority of construction traffic (especially HGVs) and offers no significant legacy benefit compared to Route W.</p> <p>In its oral submissions the Applicant argued that since the removal of the SLR was not part of the project it had to be viewed as an alternative and assessed against the guidance in section 4.4 of EN-1 (and in particular at para 4.4.3). The Applicant also made reference to the urgency of the project as a factor that would reduce the weight that should be given to an alternative of requiring the removal of the SLR. The relevant part of para 4.4.3 states that "in considering alternative proposals... whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development." However, SCC notes that a requirement to remove the SLR after the completion of the construction phase of SZC would have no implications for either the energy capacity of the project or the timescale for its deployment. SCC notes that Requirement 24 already requires the removal of various associated developments (including the park and ride sites, the freight management facility, and the green rail route) following completion of construction, and SCC considers the same could be required for the SLR. No case has been made by the Applicant that the SLR is necessary or required during the operational phase of SZC. There is therefore no reason why any urgency in relation to its deployment should weight against that alternative of requiring the removal of the SLR once construction has finished.</p>	<p>Authority's First Written Questions (ExQ1) Volume 3 - Figures Part 1 of 7</p> <p>Suffolk County Council Deadline 3 Submission - Comments on responses to ExA's Written Questions (ExQ1) [REP3-084]</p>
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	<p>Notwithstanding our position stated above, SCC remains of the view that a relief road must be provided during construction of SZC and, faced with the proposal submitted, supports the provision of a new road as an acceptable way to mitigate construction traffic impact on the B1122, during the construction period. However, based on the environmental impacts of the proposed SLR accompanied with limited legacy benefits, SCC maintains its view that the road should be removed when Sizewell C construction is complete, as set out in our Written Representations [REP2-189].</p> <p>With regards to the permanency of the SLR, in our Deadline 3 Response to AI.1.33 [REP3-084] we also outlined that the benefits offered during outages were limited by the number of outage workers who would use the route, that the occasional use of the road for AILs does not justify the environmental damage it would cause, and that whilst there would be environmental consequences for removing the route, this would be short term. Whilst larger in scale there are precedents elsewhere in the project to remove infrastructure (e.g. park and rides, LEEIE, GRR). A temporary road may, safety considerations permitting, be designed to a lower standard requiring a 'lighter' design.</p> <p>In their oral submission the Applicant set out that they are planning to take material from the SLR as well as other associated development sites and move to the Main Development Site and store it for later use. SCC are unaware of this point being raised historically and would seek further clarification, particularly on what this means for vehicle movements. We are concerned about the ambiguity on where those movements originated from, which cap they are included within, and whether this would result in movements on the B1122.</p> <p>As set out in our Deadline 3 Comments on the applicant response, notwithstanding its stated position SCC will continue to respond to the SLR as presented in the DCO, continue to work proactively with the Applicant, and that if so decided by the SoS that the SLR is to be retained, ensure the SLR is designed and built to a standard acceptable for adoption as public highway. SCC welcomes the Applicant's proposal to pay commuted sums towards future maintenance of the SLR as set out in response to 12r of their Deadline 3 Response to SCC's LIR (REP3-044).</p> <p>As set out at Table 41 of the LIR (REP1-045), in the event of retention of the link road we would also like to see the B1122 be downgraded as a quiet road for amenity. As part of their oral submission the Applicant identified that they saw that the combination of retaining the SLR plus downgrading</p>	
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	<p>the B1122 would be significant in terms of legacy benefits. The Applicant also highlighted the benefits of these proposals in ISH 3 and ISH 4, and SCC see it as important if the SLR is to be retained (contrary to its primary case) to capture these benefits. The details of these proposals are not currently agreed but SCC and ESC are in discussion with the Applicant to formulate a proposal to repurpose the redundant parts of the B1122 towards a local use with improved pedestrian, cycle and equestrian facilities together with key improvements to the adjacent B1122 to tie these facilities into the wider network.</p> <p>With regard to the timing of delivery of the SLR, SCC has set out in the LIR (paras 16.75 to 16.76) the impacts on the B1122 until the SLR is completed, and in its comments on the Deed of Obligation [REP3-083] SCC has set out its concerns at the lack of enforceable measures to require the delivery of key environmental mitigation, including the SLR.</p> <p>In its oral submissions at ISH2 the Applicant noted that SCC had not sought a 'Grampian' condition to prevent commencement of works until the SLR had been delivered and also referred to the urgency of the need to deliver the project as a reason why it could not commit to a specific timetable for the delivery of the SLR. The Applicant also referred to 2035 as a date sanctioned by Government policy and that it would not be possible to deploy SZC by that date if the SLR had to be delivered first.</p> <p>However, SCC has not argued that the SLR must be delivered before the commencement of works on the Main Development Site, but rather that there must be a clear commitment to its delivery at an early stage of the construction process (and enforceable caps on HGV movements both in the interim period and once it has been provided). If the Implementation Plan [REP2-044] was properly enforceable and its current 'indicative phasing' was tied by commitments to clear stages of the project, SCC could in principle accept that the SLR would not be completed until the end of Year 2 of the construction phase. To that extent, the Applicant seeks to paint an extreme picture in relation to urgency and the consequences for delivery of the SLR which is not a fair reflection of SCC's position. Moreover, SCC does not recognise any statement of Government policy which requires or expects the deployment of SZC by 2035.</p>	
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<p>North and South Park and Ride Size and Modelling Coverage</p>	<p>At Paragraph 16.13 (Northern) and 16.30 (Southern) of the LIR we set out that SCC strongly supported increasing the number of staff travelling by public transport and reducing the total vehicle mileage of workforce vehicle movements at Paragraph 16.14.</p> <p>The scale of the parking is derived from the Gravity Model. Although accepted as the best estimate available SCC is aware that there is a degree of risk associated with any modelling and sufficient monitoring is required to ensure that the assumptions and model outputs remain valid. Of particular relevance are the shift patterns assumed in the distribution of workers trips. Changes to these could result in more journeys during peak hours. In part this can be managed by the Applicant through controls placed on workers as proposed in REP3-079 – but will need to be monitored.</p> <p>SCC also noted that we supported earlier delivery of the facilities to capture demand. At Deadline 2, the Applicant submitted a revised Implementation Plan [REP2-044], which included:</p> <ul style="list-style-type: none"> • Accelerated delivery of the Southern Park and Ride to Q3 Year 2 compared to Q4 Year 2 set out in the original Implementation Plan [APP-599]. • Accelerated delivery of the Northern Park and Ride to Q2 Year 2 compared to Q2 Year 3 set out in the original Implementation Plan [APP-599]. <p>In principle SCC welcome earlier delivery of mitigation; however, would note that early delivery of the park and rides would result in additional bus movements, which may be an issue for those communities requiring mitigation (e.g. the Two Village Bypass and Sizewell Link Road) as the magnitude of effect of impact could be greater during the Early Years as a result. We are also however conscious that late delivery of the Park and Rides would result in additional worker movements on the highway network without mitigation in place.</p> <p>As set out at our Deadline 3 [REP3-079] response SCC is seeking justification of the proposed cycle parking provision and an increase in the proposed electric vehicle charging provision, and welcome ongoing discussions with the Applicant on this.</p> <p>Northern Park and Ride</p>	<p>NNB Generation Company (SZC) Limited 'Deadline 2 Submission – 8.4 Implementation Plan Updated' [REP2-044]</p> <p>NNB Generation Company (SZC) Limited '8.4 Planning Statement Appendix 8.4I Implementation Plan' [APP-599]</p> <p>Suffolk County Council Deadline 3 Submission - Comments on any additional information/submissions received by D2 [REP3-079]</p>
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	During the accompanied site visit SCC were aware that Yoxford Parish Council raised concerns about potential use of Willow Marsh Lane as a cut through by traffic from the A1120 to access the park and ride. In terms of distance the route via Sibton Road / Willow Marsh Lane would be slightly shorter @300-400m and avoid a turn from the A1120 onto the A12 at Yoxford. However, it is along predominately single track roads where delays can occur when meeting oncoming traffic. The risk of this has been considered by SCC but the only practical way to do so would be to prevent access from Willow Marsh Lane to the A12. It was considered that this would disadvantage local residents and businesses as they would be required to follow a diversion of significant length to avoid such a closure. Alternatives such as a prohibition except for access were not considered practical due to the likelihood that such measures would not be observed.	
Agenda Item 4 – Transport Assessments approach and modelling		
Early years traffic modelling	<p>The Applicant has set out the elements included in the Early Years Modelling at Table 7.7 of their Consolidated Transport Assessment. SCC agree that the modelling is acceptable. As with any model, whilst in the majority of cases the method has been based on the best available data available at the time there remains inherent risk associated with assumptions.</p> <p>The main control and difference between the Early Years and peak modelling scenario is set out at paragraph 4.4.6 of the CTMP [REP2-054] which does not allow more than 600 HGV movements between the main site and wider road network prior to the delivery of the Sizewell Link Road and Two Village Bypass. During the examination it was set out by the Applicant that the 600 HGV cap was for movements onto the B1122 and not specifically for movements to the main site, which was how SCC understood it to this point. We will await further clarification on this matter and respond appropriately.</p> <p>All the remaining assumptions within the assessment do not have associated controls currently proposed; and these include:</p> <ul style="list-style-type: none"> • Construction workers to/from the Associated development sites; • Early Years construction workforce numbers; 	<p>Deadline 2 Submission - 8.5 Consolidated Transport Assessment - Revision 3.0 [REP2-045]</p> <p>Deadline 2 Submission - 8.7 Construction Traffic Management Plan - Revision 2.0 [REP2-054]</p> <p>Deadline 1 Submission - Local</p>

	<ul style="list-style-type: none"> • Construction workforce shift patterns; • LGV movements; and routing; • Level of car sharing; • HGV movements between the LEEIE and Main site; • Routeing of HGV movements between north and south; and • Peak hour movements of HGVs to Associated Development Sites. <p>SCC notes that the matter of accurate use of language was raised in ISH1. This is applicable to the use of terms such as caps, controls, forecasts and monitoring in the CTMP and will reflect on this when reviewing its position on this and the controls tables presented in REP3-079.</p> <p>Importantly we are seeking that the Early Years is appropriately defined, and the early year period is deliverable in terms of mitigation which can offset the associated impacts of Early Years traffic.</p> <p>As set out within the Joint LIR [REP1-045] and at ANNEX M [REP1-058] of the LIR, SCC is of the opinion that adequate monitoring and controls is the simplest and most pragmatic way of reducing the potential for unforeseen impacts, and SCC have set out proposed additional monitoring and controls within our Deadline 3 Response [REP3-079]. However, we are having active engagement to seek common ground.</p> <p>We are also seeking confirmation of a number of other controls or monitoring relating to routeing and timing of HGVs to the associated development and how they are embedded within the CTMP as set out in our Deadline 3 response.</p> <p>SCC however are not yet currently convinced that the commitments nor the level and frequency of monitoring is satisfactory to address these risks. At Deadline 3 [REP3-079] SCC set out our current position on monitoring, which can be discussed in ISH 3 Agenda Item 2. SCC's position is that it seeks to apply justifiable controls and monitoring to validate the assumptions made in the transport assessment and environmental assessment ensuring that the forecast impacts are not exceeded.</p>	<p>Impact Report (LIR) [REP1-045]</p> <p>East Suffolk Council / Suffolk County Council Deadline 1 Submission - Local Impact Report - Annex M Transport related mitigation, requirements and obligations [REP1-058]</p> <p>Suffolk County Council Deadline 3 Submission - Comments on any additional information/submissions received by D2 [REP3-079]</p>
Seasonal traffic effects	<p>SCC consider that assessment of a neutral month is acceptable for assessing transport impacts and reflects normal practice. SCC also consider that an element of robustness has been built into the</p>	<p>NNB Generation Company (SZC)</p>

	<p>assessment by including the outage flows. As set out at Paragraph 2.3.72 and Plate 2.1 of the Applicant's Consolidated Transport Assessment [REP2-045] August can exhibit higher traffic flows, and this can be particularly noticeable in the Friday evening peak hour.</p> <p>It is worth noting that by increasing the background traffic; the potential exists that the assessment could dilute Sizewell C's impact as a discrete element (as opposed to in combination), especially with regards to proportional change in traffic flows.</p>	Limited Deadline 2 Submission - 8.5 Consolidated Transport Assessment - Revision 3.0
Buses	<p>As set out at paragraph 16.14 and 16.30 of the LIR [REP1-045] SCC strongly supports high numbers of staff travelling to the site via bus.</p> <p>SCC is of the opinion that buses have been modelled acceptably, and agrees with the Applicant's response to TT.1.50 part 3 [REP2-100] that the assessment includes a reasonable level of buses to assess the effects of buses on the highway network. However, this is on the basis of relevant controls being in place.</p> <p>SCC is content that the control on 'direct buses' set out at paragraph 4.3.6 of the Construction Worker Travel Plan [REP2-055] are acceptable.</p> <p><i>"The direct bus timetables and routes will be subject to ongoing refinement during the construction phase to adapt to the number and distribution of the workforce. Prior to a new direct bus service being implemented by SZC Co., the transport co-ordinator will submit information to the TRG in terms of the proposed route, bus stops and timetable for their approval by the TRG. Likewise, any refinements to direct bus services once they are operational would also need to be approved by the TRG."</i></p> <p>However, as set out in our Deadline 3 Response [REP3-079] we seek assurances that this control is also for park and ride buses to ensure that the impacts associated with these buses do not materially exceed those assessed.</p> <p>We are also seeking that monitoring of park and ride buses includes GPS data on routes to ensure that they utilise those routes assessed.</p>	<p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p> <p>Suffolk County Council Deadline 3 Submission - Comments on any additional information/submissions received by D2 [REP3-079]</p>

	As set out in our Deadline 3 [REP3-079] response, whilst supportive of the use of buses we would also like to see monitoring of bus occupancy to minimise empty buses on the highway network.	
Park and Ride sites traffic modelling	<p>SCC considers that the Park and Ride facilities have been adequately modelled both in terms of the strategic model and local junction models, subject to compliance with the assumptions within the assessment.</p> <p>As set out in Annex M of the LIR; the development should include monitoring of the park and ride facilities and level of car sharing. The Applicant proposed to undertake monitoring within the CWTP [REP2-054] and SCC is currently looking for more extensive monitoring than is currently proposed as set out in our Deadline 3 Response [REP3-079], as well as more extensive reporting on bus occupancy.</p>	<p>Deadline 1 Submission - Local Impact Report - Annex M Transport related mitigation, requirements and obligations [REP1-058]</p> <p>Deadline 2 Submission - 8.8 Construction Worker Travel Plan - Revision 2.0 [REP2-054]</p> <p>Suffolk County Council Deadline 3 Submission - Comments on any additional information/submissions received by D2 [REP3-079]</p>