

**The Sizewell C Project, Ref. EN010012**

**Issue Specific Hearing 3 (8 July 2021) – (ISH3)  
Traffic and Transport**

**Post Hearing Submissions including written  
summary of Suffolk County Council's Oral Case**

**Suffolk County Council Registration ID Number: 20026012**

**Deadline 4**

**23 July 2021**

**Issue Specific Hearing 3 (8 July 2021) - (ISH3) 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.	
<b>Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings</b>		
<b>Agenda Item 2 – Continuation of Agenda Item 4 from ISH 2(if required) Transport Assessments approach and modelling</b>		
	Not applicable.	
<b>Agenda Item 3 – Monitoring and control mechanisms relating to traffic and transport</b>		
Early Years Control in the DCO	<p>SCC are currently of the opinion that there are no Early Years Controls in the DCO itself, but that the controls arise through the associated management plans, secured through the deed of obligation, and that on this basis it is important that there are clear definitions and that the controls are effective.</p> <p>SCC has repeatedly raised concerns over the extent and appropriateness of controls and monitoring in our submissions, most notably at Paragraph 28 of our Relevant Representations [RR-1174] and at ANNEX M of the Joint LIR [REP1-045]. SCC are looking for relevant controls and monitoring that ensure that what is consented falls within the scope of that which has been assessed in order to meet the requirements of the EIA regulations.</p> <p>At ISH3 the Applicant made oral submissions to the effect that there was no need to impose controls merely to ensure that the project stayed within the limits of what had been assessed in the ES. The Applicant referred to paras 4.1.7 and 4.1.8 of EN-1 to support its approach and argued that controls should only be imposed where necessary to make the development acceptable in planning terms. However, SCC submits that there is a circularity in this contention by the Applicant, in that in order to</p>	Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]

	<p>determine what is necessary to make the development acceptable in planning terms, the decision maker can only have regard to what has been assessed and has no informed basis to form a judgment on the acceptability in planning terms of what has not been assessed.</p> <p>Of course, SCC accepts that EIA is only concerned with the assessment of the likely significant effects of a development and there is no need (on EIA grounds) to assess that which is not significant or that which is not likely (and both of those matters involve the exercise of planning judgment). In addition, not every likely significant effect which has been assessed will be a harmful or adverse effect, so as to warrant any form of control to limit the development to such assessed effects.</p> <p>SCC also notes that paras 4.1.7 and 4.1.8 of EN-1 are not addressing EIA matters. EN-1 addresses EIA matters in section 4.2 and paras 4.2.8 and 4.2.9 refer to the need for the “maximum extent” of a project to be assessed where certain details are at large, and to the need for the decision maker to reflect any such uncertainty in “appropriate development consent requirements”. It is clear from this that the requirements should tie the development to the maximum extent of what has been assessed (where any likely significant effect would have harmful consequences for any aspect of the receiving environment).</p> <p>Para 4.2.8 of EN-1 also draws attention (via footnote 78) to the use of the ‘Rochdale Envelope’ in EIA to set the maximum extents of what has been assessed. Advice Note 9 from the Planning Inspectorate provides further guidance of the use of the ‘Rochdale Envelope’, including at para 2.4 that:</p> <ul style="list-style-type: none"><li>• “the clearly defined parameters established for the Proposed Development must be sufficiently detailed to enable a proper assessment of the likely significant environmental effects and to allow for the identification of necessary mitigation, if necessary within a range of possibilities;</li><li>• the assessments in the ES should be consistent with the clearly defined parameters and ensure a robust assessment of the likely significant effects;</li><li>• the DCO must not permit the Proposed Development to extend beyond the ‘clearly defined parameters’ which have been requested and assessed. The Secretary of State may choose to impose requirements to ensure that the Proposed Development is constrained in this way.”</li></ul>	
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	<p>Advice Note 9 also advises at para 5.5 that:</p> <p>“An Applicant may choose to include parameters within the DCO as a practical way to address uncertainty and provide the required flexibility. Parameters can be secured within the DCO in a variety of ways; for example by inclusion within principal powers, by inclusion within schedules detailing the Authorised Development or by inclusion within Requirements. Applicants should take care to ensure that any flexibility sought in their DCO has been consistently and robustly assessed within their ES.”</p> <p>SCC therefore suggests that with regard to the likely significant effects of the proposal relating to traffic and transport, the flexibility open to the Applicant when undertaking the development is limited by the maximum extent of what has been assessed in the ES, and it is entirely legitimate for SCC to expect that controls should be imposed (either by the DCO or by the Deed of Obligation) to limit the development to effects which are no greater than those which have been assessed. Whilst it is a matter of planning judgment whether any particular control is necessary to make the development acceptable in planning terms, SCC would suggest that the decision maker should be slow to conclude that an effect that has not been assessed (because it is materially greater or materially different from what has been assessed) would be acceptable in planning terms and so that there is no need to control it.</p> <p>SCC has outlined our concerns regarding the potential uncontrolled elements of the Early Years construction traffic; however, the main concerns relate to controls on:</p> <ul style="list-style-type: none"><li>• The North / South split of construction freight traffic.</li><li>• HGV traffic to the Associated Development Sites including those moving fill to the main site (unless the latter are included in main site deliveries).</li><li>• Workforce numbers prior to delivery of relevant mitigation (i.e. the accommodation campus and park and ride sites).</li><li>• AILs.</li></ul> <p>However, as important as controls is the monitoring, as set out at Paragraph 15.154 of our LIR [REP1-045], and ongoing monitoring is important to provide early identification of any potential impacts.</p>	
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	<p>Besides transport controlling HGV numbers is necessary so the modelling assumptions made for road noise and air quality remain valid.</p> <p>It was understood in the ISH that the Applicant was suggesting that the mode share targets would be sufficient for controlling impacts. SCC do not believe that the mode share targets would restrict the impacts of the development to that which has been assessed without relevant controls on total vehicle numbers, as the mode share is a proportion of the total. SCC understood that the Applicant also set out that they accept the figures within the management plans as absolute limits, however SCC do not believe that there are controls and monitoring within the current documents that ensure this. However, we welcome the Applicant's indication that there should be absolute limits.</p> <p>SCC also seek further clarity on the Applicant's position that failure to achieve the mode share targets would constitute a breach, as those mode share targets rely on the delivery of infrastructure that based on the Implementation Plan would not be in place for certain timeframes during each period. The most obvious example of this is that if a park and ride is delivered then this would trigger the peak years mode share targets for the CWTP, however, if the accommodation campus is not delivered and fully occupied, it would not be possible for the development to achieve its walking and cycling mode share. It is clear from para 4.4.19 of the Consolidated Transport Assessment [REP4-005] that the CTA has assumed that workers at the accommodation campus will walk (or cycle) to work (once that facility has been provided) and this assumption also underpins the mode share assessment targets in Table 3.1 of the CWTP [REP2-055], where during the peak construction period 28% of the Main Development Site workforce are expected to travel by walking/cycling.</p> <p>Following the Applicant's oral submission, SCC are also concerned that there are two separate definitions for 'Early Years', one for freight movements (ie HGVs) and the other for workers and the potential implications of this on the impacts considered in the Transport Assessment and Environmental Assessment, particularly on the B1122 corridor. For example, delivery of the park and rides sites would in the current framework allow the number of workers to increase above that assessed in the early years scenario but before the early years highway mitigation (SLR) is complete. This would result in more busses and workers travelling to the main site on the existing B1122 that we understand have been assessed.</p> <p>Discussions are being held with the applicant to reach agreed positions on these issues.</p>	
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<p>Construction Traffic Management Plan</p>	<p>SCC remained concerned about the process for dealing with a breach to the controls within both the CTMP and CWTP and the ability to effectively respond quickly to address associated impacts, especially in the event of a tied vote. As set out in our previous responses including our Deadline 3 submission [REP3-079], the County Council acting as chair of the group with a casting vote would be an appropriate mechanism to respond quickly to real impacts occurring on the ground.</p> <p>At ISH3 the Applicant made oral submissions that Schedule 16 of the draft Deed of Obligation [REP2-060] included an ‘absolute requirement to implement the CTMP’. Whilst para 2.2 of Schedule 16 is a covenant that the Applicant ‘will implement’ the CTMP ‘During the Construction Period’, the CTMP itself does not contain sufficient enforceable measures to enable SCC to take action if its measures are not being delivered. For example, para 9.1.3 of the CTMP is a commitment by the Applicant to ‘fund the approved TRG actions to ensure compliance with the CTMP’ but such an action can only become an ‘approved TRG action’ after a meeting of the TRG which makes a decision to approve such a measure, with the Applicant comprising half of the membership of the TRG and no party having a casting vote. Thus, in the event of an impasse, SCC could not show that the Applicant had failed to implement the CTMP so as to make out a breach of the Deed of Obligation. The Applicant suggested at ISH3 that such an impasse could be referred to the Delivery Steering Group (in Schedule 17 of the Deed of Obligation) but on that body too the Applicant comprises half of the membership so an impasse could continue. Moreover, the DSG is not empowered to direct outcomes to the TRG but merely to ‘provide assistance, guidance, and advice on actions that should be taken’ (para 3.5.3). Thus, the DSG could not break the impasse at the TRG even if it made a decision.</p> <p>At ISH3 the Applicant also made oral submissions that non-implementation of the CTMP could be enforced against the Applicant by means of an injunction, including the HGV caps. However, to secure an injunction would first require SCC to show that there was a breach of the CTMP. If the HGV cap was exceeded there is no provision in the CTMP to stipulate that any specific remedial action should be taken. Section 9 of the CTMP addresses compliance and enforcement but it does so by reference to reporting matters to the TRG, and it is only if the TRG makes a decision to require some remedial or corrective action that is not then taken by the Applicant that SCC could show a breach of the CTMP. Whilst the remedy of injunction might provide a ‘long-stop’ means of dealing with persistent breaches of the CTMP, it falls far short of a swift or effective method of addressing a failure to adhere to the HGV caps.</p>	<p>[REP3-079] SCC Deadline 3 response on controls, monitoring, Implementation Plan, CTMP, TIMP, CWTP</p> <p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p> <p>Deadline 2 Submission - 8.5 Consolidated Transport Assessment - Revision 3.0</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 - 8.7 Construction Traffic Management Plan - Revision 2.0 [REP2-054].</p> <p>NNB Generation Company (SZC) Limited Deadline 3 Submission - 8.17 Draft Deed of Obligation - Clean Version - Revision 5.0 [REP3-024]</p>
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Throughout our responses to consultations and within our Relevant Representation and LIR [REP1-045], SCC has emphasised the importance of appropriate controls and monitoring for managing the impacts of the development. SCC considers that in general the management plans are the appropriate tool for ensuring the traffic impacts of the development do not exceed those that have been assessed with the Environmental Statement and Consolidated TA [REP4-005]. SCC also considers that appropriate monitoring and controls are critical for managing the development's impacts, particularly with regards to risks that exist around the delivery of infrastructure. Monitoring is considered essential to ensure that elements of the project such as the modal share set out in the freight management strategy, worker distribution in the gravity model and the timing of workers trips to the park and rides are consistent with the assumptions made that underpin the ES and TA. Discussions are being held with the applicant to reach agreed positions on these issues.

SCC considers that the proposed caps, controls and monitoring measures are not sufficient to protect the highway network from impacts. The section "Transport risks identified from the transport modelling" (paragraph 15.59-15.72) in the Local Impact Report [REP1-045] provides a rationale for the proposed controls.

There are numerous different movements with different levels of controls and monitoring proposed. At Deadline 3 [REP3-REP79], SCC attempted to provide a summary of the Applicant's proposed controls and monitoring along with the additional controls that SCC request should be included. Each control would require adequate methods for monitoring to ensure compliance or so that a breach can be identified. We note that the applicant has committed to considering the implications of quarterly caps on HGVs and will respond at a future date, and we welcome this dialogue.

It should be noted that SCC's approach is to ask for what are considered fair and reasonable measures to with the purpose of ensuring that what is modelled in the Freight Strategy, TA and ES is what is what is delivered and this can be demonstrated to stakeholders.

With regards to the Contingent Effect Funds. SCC are in principle in favour of funding for unforeseen impacts. The nature and scale of the project makes it likely that however good the modelling, unforeseen impacts are likely to occur, and this should be seen in the context that some minor links are not modelled. On this basis, SCC are of the positions that those locations where mitigation can be provided should not be limited to those listed in the Annex. The list provided by SCC in its LIR was a reflection of

	<p>the information available at the time based on the developing TA, ES and local concerns / knowledge associated with the roads contained within the scope. As modelling exercises neither the TA or ES drilled down into local roads and SCC is concerned that exclusion of funding from the Contingent Fund can result in unforeseen impacts on these local roads falling outside the remit of the TRG. An example could be SZC and local traffic using the minor roads between the B1119 and B1122 Abbey Road.</p> <p>Personal Injury Collisions should not just focus on those involving SZC vehicles. Impacts such as driver frustration may lead to greater risk taking and an increase in collisions not involving SZC vehicles, but still a direct impact from the additional construction vehicles using the local road network (e.g. A12 Bredfield).</p> <p>In the CTMP the Applicant correctly identify that demand management measures should be considered before new infrastructure. SCC would argue this reinforces the authorities request for sufficient monitoring to be undertaken so that early warning when data indicates a departure from the forecasts for the SZC project (e.g. workers numbers, HGVs, P&amp;R usage).</p>	
Construction Worker Travel Plan	<p>Following the Applicant's reference to unlimited liability as a result of their commitments through the TRG, in our oral submission we raised concerns regarding the caps placed on the contingent effect funds. Following the Applicant's response it is understood by SCC that this liability relates to management measures that the Applicant would implement to sure that their impacts stay within the limits of the DCO. However, similar points arise as to the management or remedial measures being matters that have to be approved by the TRG before they become matters that the Applicant has to fund and the points SCC has made about the governance of the TRG in relation to the CTMP also apply to the CWTP. SCC would welcome further clarification on this through discussions with the Applicant.</p> <p>Table 3.1 of the CWTP [REP2-055] sets out the mode share assessment targets for the main site, whilst we recognise that these numbers reflect those assessed within the Transport Assessment, it is worth noting that the early years park and ride bus requires all staff to drive to the LEEIE, which is adjacent to the main site, and so the level of sustainability of that mode should be seen in this context. The mode share targets ref to two specific points in the project and there will be a transition period between these. SCC recognises this considers that further discussion is needed to ensure that it is clear when these become enforceable and that sufficient forecasts and monitoring are available so that early warning is provided to enable actions to be taken so that the targets are achieved.</p>	<p>[REP3-079] SCC Deadline 3 response on controls, monitoring, CTMP, TIMP, CWTP</p> <p>NNB Generation Company (SZC) Limited Deadline 2 Submission - 8.8 Construction Worker Travel Plan - Revision 2.0 [REP2-055]</p>



	<p>As set out in our Deadline 2 [REP2-192] response to AR.1.7 and AR.1.29 of the examining authority's questions, SCC remains concerned about the sustainable transport route for workers travelling from Leiston along Abbey Road to the site, as well as the impact on this route of increased vehicle movements for existing users. This route is the most direct between the site campus and the town centre and the existing facilities for NMU do not meet current design standards.</p> <p>Paragraph 4.3.12 of the CWTP [REP2-055] sets out that, aside from exceptional circumstances, workers living within 800m walk or cycle for Park and Rides would be required to travel to the sites by these modes. Whilst the principle is noted, this is in fact likely to include a very small number of properties and that there is an opportunity to make this a more meaningful aspiration if a wider area is considered.</p> <p>SCC is working with the applicant to confirm an appropriate provision of cycle parking, motorcycle parking and electric vehicle charging provision as per our Deadline 3 response.</p> <p>CWTP 4.7.15: EV Charging guidance for Park and Ride and FMF sites is considered to be closest to B1 Business and B2 General Industrial uses in the Suffolk Guidance for Parking. This requires 20% of all spaces to be fitted with a charging system, with an additional 20% of parking spaces with the infrastructure in place for future connectivity. This should be increased to 25% fitted spaces and 25% future connectivity for the site accommodation campus (i.e. C1 Hotel use).</p> <p><a href="https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf">https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf</a></p>	
Traffic Incident Management Plan	<p>No specific controls or monitoring is proposed in the TIMP. In terms of management this is likely to comprise reviews by the TRG and Suffolk Police in the event of complaints or issues arising from SZC traffic during an incident. SCC recognises that stacking capacity for HGVs is provided at locations, including the FMF and southern park and ride, but does not agree that SZC (TIMP 4.3.18) HGVs and buses should use signed diversions as these are often quite long, rarely suitable for significant volumes of traffic, and particularly for large vehicles. However, we welcome discussions with the Applicant on this, as part of their scenario planning.</p> <p>SCC have other comments on TIMP as submitted at deadline 3 [REP3-079].</p> <p>The key for successful management of traffic during an incident will be the delivery management system and supporting information management / distribution. While the TIMP is aimed specifically at the</p>	[REP3-079] SCC Deadline 3 response on controls, monitoring, CTMP, TIMP, CWTP

	management of HGV traffic there would be benefits to other construction related traffic such as the service buses, LGVs and workers travelling to the site or associated developments if the real time information can be made available to them (see 4.3.21).	
Operational Travel Plan	<p>SCC see the value in the provision of a Framework Travel Plan to set out the overarching objectives of the Operational Travel Plan; however have accepted that it would be a follow on document.</p> <p>SCC seek assurances that as there appears to be crossover between the beginning of operational workers being on site and the end of construction as indicated at Table1.5 of Appendix 9A of [APP-196] and as a result, as set out in our Deadline 3 response [REP3-079], it would be useful to understand how measures for operational staff can be embedded during this transition period and confirmation that they would be covered by the CWTP until the OTP was implemented.</p> <p>Given the scale of development and its location, SCC would welcome an extension of the Operational Travel Plan beyond the suggested five years, or a mechanism that would instigate a review at the end of the five-year period to see whether the Travel Plan had met its targets, and if not for the Plan to continue.</p>	<p>Deadline 2 Submission - 8.8 Construction Worker Travel Plan - Revision 2.0 [REP2-055]</p> <p>NNB Generation Company (SZC) Limited 6.3 Volume 2 Main Development Site Chapter 9 Socio-economics Appendices 9A - 9F [APP-196]</p>
<b>Agenda Item 4 – Consideration of Local Transport Impacts</b>		
Difference in proposed mitigations identified in the Transport Assessment and those required by SCCs	<p>The applicant, ESC, HE and SCC are engaged in discussions regarding the local transport impacts. Progress on the transport modelling and environmental impacts means these are close to agreement in many cases.</p> <p>The remaining substantive issues are:</p> <ul style="list-style-type: none"> <li>• A12 Seven Hills to Woods Lane</li> <li>• B1122 Early Years Mitigation</li> <li>• B1125 Corridor, specifically Westleton</li> <li>• Impacts on Yoxford (subject to ES)</li> <li>• NMU access between the main site entrance/ site campus and Leiston town centre</li> <li>• Leiston HWRC</li> </ul>	<p>Deadline 1 Submission - Local Impact Report (LIR) [REP1-045]</p>

In all cases discussions with the applicant are ongoing. We have been continuing to engage with the Applicant on mitigation; however, this work is being informed by the Environmental Statement and although that workstream is nearing completion we have not yet reached firm conclusions, of which we will keep the Examining body informed.

#### **A12 Corridor between A1152 Woods Lane and A14 Seven Hills**

Suffolk County Council is in the process of submitting a business case to the Department for Transport to improve the corridor. In our business case we will show that the scheme is needed:

- to reduce congestion
- to improve conditions for pedestrians, cyclists and bus users
- to deal with pressures arising from planned new development

At Table 15 of the [REP1-045] LIR SCC sets out that a contribution towards mitigating the development's proportional impacts on the A12 between A1152 Woods Lane and A14 Seven Hills was considered to be required mitigation for the development. Further details on the development's impact was included in SCC's response [REP2-192] to the examining Authority's question TT.1.82; however, this was amended due to a number of typos, for which we apologise, and resubmitted at for Deadline 2 [REP2-517].

SCC is of the opinion that there is a significant impact on this corridor when taking into consideration the in-combination effect of the changes in queuing and delay at a number of different locations, and associated increase in HGVs. SCC recognises that Sizewell C is only a proportion of the traffic on this corridor, but that it does contribute towards a worsening of the operation of the highway network. We hope to continue to have discussions with the Applicant on that and we can expand upon the specific impacts in our written submission.

Much like the Professional judgement that the Applicant has used in determining that their impacts are not significant, we have used our Professional judgement when considering the modelling data and have reached a conclusion that the degradation of the operation of the highway network as a result of traffic growth requires an intervention. In our judgement, Sizewell C significantly contributes to that traffic growth which affects delay and queuing. These also have knock on impacts associated with road safety and the economic impact of congestion. Sizewell C also results in a significant proportional increase in HGVs, which would have impacts on vulnerable road users, as well as a significant increase in AILs, which

	<p>again would have impacts associated with congestion in particular. These impacts in combination we believe is significant.</p> <p>A high-level assessment of the economic impact of congestion has been undertaken and was submitted as Deadline 2 [REP2-192]. Whilst, it would be unreasonable to use the assessment to calculate an exact figure for the economic impact of congestion during construction; the assessment does indicate that for the A12 corridor between Seven Hills and A1152 Woods Lane there would be a significant negative cost on the economy, as a result of congestion along this corridor and gives a range of the economic impacts based on the high level assessment method, however we recognise that the Applicant does not agree to the conclusions of the assessment, as set out in their response to SE.1.42 at [REP3-046]. We have set out an initial response to SE.1.42 the Applicant in our Deadline 5 submission, but understand that the applicant plans to respond to our economic assessment at Deadline 5, and so depending on their response will subsequently look to suitably response.</p> <p>Further to the impacts above are the unquantified impacts of increased journey times associated with potential AIL movements along this corridor.</p> <p>When considering all of the impacts above as a result of the additional traffic along the extent of the corridor, SCC is of the opinion that there is a material impact.</p>	
	<p>For SCC's list of locations where mitigation is required or many potentially be required see Table 14, 15, and 16 of our Joint Local Impact Report [REP1-045]. These locations need to be seen in the context that the ES workstream is in the process of being updated, and so would need to be reviewed on this basis. We will undertake this review once the information is made available.</p> <p><b>Marlesford and Little Glemham</b> The Applicant has engaged with the two Parish Councils and Suffolk County and East Suffolk Councils on the matter and draft plans of mitigation have been developed. These are under consideration by the interested parties.</p> <p><b>Leiston</b> The Applicant is engaged with Leiston Town Council, ESC and SCC to develop a mitigation package for the traffic impacts in Leiston. While the primary focus on this is to prioritise pedestrians and cyclists there are</p>	<p>Deadline 1 Submission - Local Impact Report [REP1-045]</p> <p>NNB Generation Company (SZC) Limited 'Deadline 2 Submission – 9.11 Responses to Examining Authority's First Written Questions Volume 3 Appendices Part 5 of 7' [REP2-112]</p> <p>Suffolk County Council Deadline 3 Submission - Comments on</p>

	<p>also traffic benefits, predominately changes to the High Street / Park Hill / Station Road/ Waterloo Avenue junction that will contribute towards minimising delays.</p> <p><b>Wickham Market</b> The Applicant is engaging with the Parish Council, ESC and SCC to develop a package of highway measures to mitigate the transport impacts on Wickham Market.</p> <p><b>Yoxford</b> Initial discussions have taken place between the Applicant and SCC on the potential for mitigation at this location and a meeting has with the Parish Council I planned. We welcome the Applicant’s commitment to further dialogue with relevant interested parties.</p> <p><b>Westleton</b> Initial discussions have taken place between the Applicant and SCC on the potential for mitigation at this location. We welcome the Applicant’s commitment to further dialogue with relevant interested parties.</p> <p><b>B1122 Early Years</b> The Environmental Statement and the ES Addendum Transport chapters have been reviewed by SCC with a number of concerns raised. The Applicant has been working with SCC to address our concerns and that workstream has made recent progress, but has not been completed, and the results of which SCC will inform the Examining Authority with; however, it is unlikely that this workstream would materially affect any conclusions regarding impacts on the B1122, as the scale of change that would result in a reduced magnitude of impact is likely to be far too significant.</p> <p>At Paragraphs 16.75 and 16.76 of the LIR [REP1-045], SCC sets out the negative impacts on the B1122 prior to delivery of the Sizewell Link Road.</p> <p>At Deadline 2 the Applicant submitted the response to the Examining Authority’s questions [REP2-112] which included Appendix 24C ‘Mitigation for B1122 Communities During the Early Years’. Section 4 of the Appendix included identification of further actions to mitigate early years impacts. Subsequently, SCC is also in discussions with the Applicant over potential mitigation at this location and consider this improvement strategy for the area to be of considerable importance, and we welcome the Applicant’s commitment to these discussions and to resolving these concerns.</p>	<p>responses to ExA’s Written Questions (ExQ1) [REP3-084]</p>
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	<p><b>PROW</b></p> <p>It is understood that Publics Rights of Way may form part of a separate hearing; however, the key PRow issues raised to date are as follows:</p> <ul style="list-style-type: none"> <li>• Protection of the Suffolk Coast Path during construction and operation of the BLFs</li> <li>• Alignment of PRow relative to coastal defence</li> <li>• Delivery of a suitable diversion route for the Suffolk Coast Path and BW 19 that is safe and available at all times. The residual issues are the lack of a footway link from the north end of BW19 to Leiston and design of the bridge over Leiston Drain.</li> <li>• The lack of off road alternative to Eastbridge Rd to Eastbridge</li> <li>• Agreement of the details of the PRow interaction with the SLR and 2VBP and securing these through the DCO schedules</li> <li>• That the retention of the footpaths on Kenton Hills as permissive paths has no legacy benefit</li> <li>• Relationship of Public Rights of Way Working Group and TRG</li> </ul> <p><b>Economic and human cost of congestion</b></p> <p>Aside from the impacts identified, we expect there to be a residual impact which will have an adverse financial impact on local businesses and public service provision which should be mitigated, as well as potential impacts on emergency services, including response times.</p>	
<p>Approach to assessment for impacts in Chapter 10 of</p>	<p>The Environmental Statement and the ES Addendum Transport chapters have been reviewed by SCC with a number of concerns raised. The Applicant has been working with SCC to address our concerns and that workstream has made recent progress, but has not been completed and for which SCC will need to review. The results of which SCC will inform the Examining Authority with.</p>	

<p>the Environmental Statement</p>	<p>The Environmental Statement and the ES Addendum Transport chapters have been reviewed by SCC with a number of concerns raised. The Applicant has been working with SCC to address our concerns and that workstream has made recent progress, but has not been completed and for which SCC will need to review. This will affect the outcomes of the cumulative assessment.</p> <p>The Applicant has included a modelling scenario with SPR traffic, and as set out at our Response to TT.1.62 of our Deadline 2 Response [REP2-192] to the Examining Authority’s questions we consider that acceptable data has been assessed.</p> <p>Subject to confirmation of the updated ES workstream, we have been working with the Applicant on identifying reasonable and proportionate mitigation at those locations where a cumulative impact occurs.</p> <p>One noteworthy location where this is not the case is the A1094 / B1069 east junction: In the ‘with SPR’ assessments the junction is over capacity in both Early Years and Peak construction with demonstrable impacts associated with the developments. In the without SPR scenario the junction functions comfortably within capacity and in the SPR only scenario from their DCO submission the junction also functions within capacity. Both proposals include mitigation works at this junction; however, impacts here will need to be monitored and management measures considered in the event of the cumulative scenario occurring.</p> <p>As set out in SCC’s Response to TT.1.63 of our Deadline 2 Response [REP2-192] to the Examining Authority’s questions, SCC remains concerned that the lack of certainty regarding delivery of NSIP projects on the east coast of Suffolk, local development (e.g. Brightwell Lakes / Saxmundham Garden Village and the A12 MRN) scheme makes coordination and planning of highway works difficult. However, acknowledging this SCC seeks to co-ordinate these works as far as practicable.</p> <p><b>SPR in-combination mitigation</b></p>	<p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/ENO10077/ENO10077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/ENO10077/ENO10077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf</a></p> <p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/ENO10077/ENO10077-005439-ExA.SoCG-2.D12.V6%20EA1N&amp;EA2%20Statement%20of%20Common%20Ground%20with%20East%20Suffolk%20Council%20and%20Suffolk%20County%20Council.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/ENO10077/ENO10077-005439-ExA.SoCG-2.D12.V6%20EA1N&amp;EA2%20Statement%20of%20Common%20Ground%20with%20East%20Suffolk%20Council%20and%20Suffolk%20County%20Council.pdf</a></p>
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	<p>Details of the mitigation proposed for SPR are included in their Construction Traffic Management Plan (REP11-024 of the East Anglia One North DCO). These were developed to mitigate SPR's contribution to the cumulative impact of SZC and both SPR projects with the exception of the A12/A1094 junction where a traffic signal scheme was developed to mitigate the impacts of the SPR projects in isolation as it is anticipated that if SZC also is consented and delivered the A12/A1094 junction will be replaced by a roundabout as shown in the 2VBP plans. The Statement of Common Ground between SPR, ESC and SCC may also be of interest.</p>	
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