NORTON ROSE FULBRIGHT

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Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Direct line
[redacted]

Email
[redacted]@nortonrosefulbright.com

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Attention: Sizewell C Case Team

Your reference	**Our reference**
EN010012	SFIT/CARW/1001117461

Dear Sirs

The Sizewell C Project – Deadline 6: Comments on any additional information/submissions received by D5

1 We act for the Heveningham Hall Estate (Unique Reference: 20026675) (the **HHE**) and write further to the publication of the following documents at Deadline 5:

(a) Document 9.49 - Written submissions responding to actions arising from ISH2: Traffic and Transport Part 1 (8 July 2021) **[REP5-114]**; and,

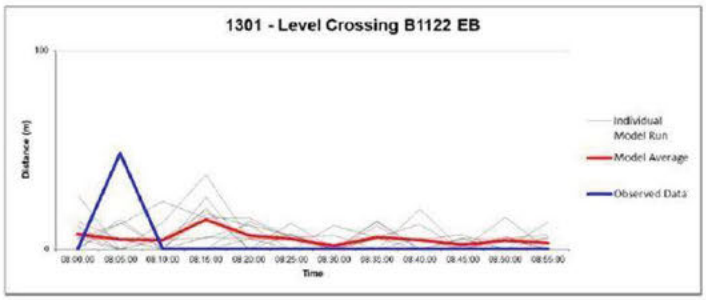
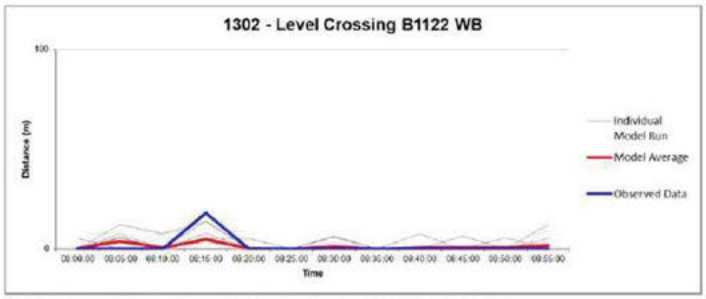
(b) Document 9.50 - Written submissions responding to actions arising from ISH3: Traffic and Transport Part 2 (8 July 2021) **[REP5-115]**.

2 Transport Planning Consultants (**TPA**), acting on behalf of the HHE, make the following comments regarding the above documents in Table 1 and paragraph 4 to this letter.

3 Please note that the fact the HHE has not commented on or responded to a particular point made or document published at Deadline 5 should not be interpreted as tacit approval.

Table 1: TPA comments on REP5-114

Extract	Comment
1.12.4 There are a small number of instances where the level crossing queues do not materialise at exactly the same time of day in the model and in the observed data. This is simply because the trains in the VISSIM model are assumed to	The Applicant's explanation only applies to a limited number of cases and does not address the scale of difference between the modelled and observed results (i.e. the magnitude of the observed queues). The difference between the modelled and the observed queues cannot be attributed to a delay in the train timetable. The observed queues were themselves much longer.

Extract	Comment
run to timetable whilst a small number of trains captured in SZC Co.'s observations were not on time. This therefore does not indicate a calibration problem with the model. Detailed queue length calibration graphs are presented in Consolidated Transport Assessment Appendix 9B **[REP2-050]** (p220-252) and demonstrate a high degree of correlation with observed conditions.	TPA disagrees with the Applicant's assessment that the calibration graphs in the Consolidated Transport Assessment demonstrate a "high degree" of correlation with observed conditions. TPA also regards the difference between the modelled and observed queues to be unacceptable, given that the VISSIM model is the tool used by the Applicant to estimate the impact along the corridor.   **Figure 9 – B1122 Level Crossing Queue Length Validation (AM peak)**
1.13.3 At the ISH2, SZC Co. agreed to provide a written response with regards to the following comments made by Heveningham Hall Estate: • Why the 3,000 workers allocated to the accommodation campus and caravan park are not included in the gravity model and the Estate's suggestion that there may be an underestimate of workers in the gravity model if there are less people living in the campus and caravan park at peak	The Applicant's response wholly fails to address the HHE's point regarding the tidal movement of workers on a Friday night or a Sunday night from their homes to the main construction site. Please see the HHE's Deadline 5 submission at paragraphs 3.2-3.3 **[REP5-278]** for further details.

Extract	Comment
construction than forecast; […] 1.13.4 With regards to the first point, SZC Co. is confident that the proposed project accommodation will be fully occupied at the peak. Experience at Hinkley Point C, set out in response to ExQ1 AR.1.2, CI.1.2 and CI.1.6 [**REP2-100**] suggests that there will be substantial demand for this accommodation, and SZC Co. will price the accommodation to fill it. Please also see the comments in respect of worker mode share targets and limits on parking set out earlier in this note, which act as appropriate controls.	
1.13.7 Finally, within the gravity model, workers have been allocated to either the northern or southern park and ride based on their quickest overall journey time to the main development site (i.e. including journey time to the park and ride facility, transfer from car to bus and then onward journey by bus to the main development site). The gravity model park and ride allocation has not been based on the nearest park and ride facility to worker residence. It should be noted that the gravity model is based on Census boundaries and not worker postcodes but it is considered that it provides a reasonable basis from which to assess the effects of worker trips. 1.13.8 In reality, workers will be allocated to park and ride facilities based on their postcode rather than Census output area and there will be pragmatic judgements made with regard to the allocation between northern and southern park and ride facility. The issue raised by Heveningham Hall Estate relates to the area west of Saxmundham and that these workers have been allocated within the gravity model to the northern	The HHE's reference to workers from Saxmundham was but one example used to illustrate that the Applicant's methodology to design the model contradicts statements in the Construction Worker Travel Plan [**REP2-055**] that "*all […] workers will be allocated to the northern or southern park and ride facilities, depending on which is closest to their place of residence*" (see paragraph 4.8.1). Please see paragraph 4.5 of the HHE's Deadline 5 submission at **REP5-278** for further details as to why the Applicant's approach undermines its justification for the size of the Northern Park and Ride.

Extract	Comment
park and ride rather than the southern park and ride. Interrogation of the gravity model shows that this rural area is forecast to have 16 worker trips originating from it, which have been assigned to the northern park and ride as this would provide the shortest overall journey time. Even if in reality they were assigned to the southern park and ride it would not impact the conclusions of the Consolidated Transport Assessment [**REP4-005**].	

4 With regard to Document 9.50 - Written submissions responding to actions arising from ISH3: Traffic and Transport Part 2 (8 July 2021) [**REP5-115**] and the Applicant's description of how the two park and ride sites were designed and sized at paragraph 1.5, the HHE notes the Applicant has designed the sites to have an average occupancy of 78%, based on:

(a) an average of 84% for the Northern Park and Ride; and,

(b) an average of 72% for the Southern Park and Ride.[1]

As detailed in the HHE's Deadline 5 submission [**REP5-278**, paragraph 4.5], the park and rides are employee car parks. If the Applicant were to assign car parking spaces to employees, it would negate the need for a 20+% buffer of "spare" parking spaces. As a result, and allowing for a 5% buffer (not 15% or 22%), smaller park and ride sites would be sufficient to meet the anticipated demand. Using the figures in Table 13 of Appendix 7B of the Consolidated Transport Assessment [**REP4-005**] the peak parking demand across the two park and ride sites is 1,948 spaces (1,054 spaces at the Northern Park and Ride site and 894 at the Southern Park and Ride site). With a 5% buffer, this equates to a total of 2,046 (rather than 2,500) spaces.

Yours faithfully

[redacted]

Norton Rose Fulbright LLP

[1] See paragraph 1.5.14 of Document 9.50 - Written submissions responding to actions arising from ISH3: Traffic and Transport Part 2 (8 July 2021) [**REP5-115**].