

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 8 (25 August 2021) –
(ISH8) Air Quality and Noise and Vibration Post
Hearing Submissions including written
summary of Suffolk County Council's Oral Case**

Suffolk County Council Registration ID Number: 20026012

**Deadline 7
2021**

3 September

Issue Specific Hearing 8 (25 August 2021) - (ISH8) Air Quality and Noise and Vibration

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

Note: 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.

Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 - The assessment of the noise and vibration impacts of the Proposed Development		
<p>(i) Whether the potential noise and vibration impacts of the Proposed Development can be satisfactorily assessed from the information submitted by the Applicant?</p> <p>(ii) If not, what additional information would be required?</p>	<p>(i) No, there are some outstanding areas where the potential noise and vibration impacts of the Proposed Development cannot currently be satisfactorily assessed. These are detailed in the initial Statement of Common Ground [REP2-076].</p> <p>ESC and SCC's consultants have submitted a number of questions and requests for additional information and clarifications in the form of numbered RFIs. These documents have also been submitted to the Examination [REP3-031 and REP6-032].</p> <p>The Applicant has supplied formal responses to the early requests [REP3-031] and also recently supplied draft responses to the later requests which we understand will be submitted to the Ex-A at D7. SCC are in the process of reviewing this information and will respond formally once these are submitted.</p>	<p>Department for Transport, Standards for Highways Series 900 https://standardsforhighways.co.uk/ha/standards/mchw/vol1/pdfs/3796149%20MCHW%20Vol%201%20Series%20900_Print%20v0.2.pdf</p>

	<p><u>(ii)</u> The Applicant has supplied draft responses to RFI's but these have not been fully reviewed so this is not an exhaustive list however the following issues are considered significant and known to be outstanding:</p> <p>Rail noise ESC is leading on the matter of Rail Noise and SCC is in agreement with its position stated in the hearing. Further information is provided in the joint local authority Statement of Common Ground.</p> <p>Road noise It is SCC's understanding that the upcoming revisions to the NMS will significantly reduce the number of properties eligible for insulation under the NMS, particularly properties along A12. SCC has requested details of the specific number of receptors along existing roads where increases in road traffic noise will trigger the Noise Mitigation Scheme (based on the originally and revised thresholds. Whilst the applicant indicated that this information had not been provided because it was not required by the methodology, the applicant (via Mr Rhodes) went on to give figures in relation to receptors who would be eligible for noise mitigation on the B1122, which would imply that the applicant has available information even if it considers the methodology does not require it. SCC would repeat its request for information on the numbers of affected receptors on the A12.</p> <p>SCC have also queried whether quiet road surfaces and associated maintenance funds (for new and existing roads) and noise bunds (new roads) being considered to meet the EN-1 and NPSE policy aims to minimise and mitigate noise above LOAEL. [RFI 41, REP6-032]. In the hearing SZC Co mentioned that they have been discussing potential noise suppressing bunds and low noise surfacing. SCC as the LHA and body for technically approving works that will become public highway the authority will need to be involved in the design of bunds, acoustic fencing and specification of road surfacing. Issues such as future maintenance and inclusion within the public highway also need to be addressed</p>	
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	<p>Manual of Contract Documents for Highway Works: Volume 1: Specification for Highway Works: 900 Series: Clause 942 table 9/17 allows specification of level 3 surfacing with a 3.5dB noise reduction, lower than the 2.5dB reduction suggested by SZC Co. however, lower noise surfacing are generally of poorer durability than 'standard materials' and this will need to be considered in the design of new and existing roads. The authority would expect SZC Co. to fund maintenance of such surfaces in the construction period of SZC. Unfortunately, due to the uncertainty of future highway maintenance, it is not possible for SCC to commit to do so in the longer term.</p> <p>SCC considers that level 3 is appropriate for existing roads (A12, B1122) but level 2 may be suitable for new roads where additional mitigation is possible, for example where bunds or cuttings reduce the overall traffic noise. SCC notes that these details will be refined at the detailed design stage and that the specification for the new/altered roads is a matter to be agreed under Article 21(3) of the draft DCO.</p> <p>(05/18) Noise</p> <p>34 (05/18) Where noise characteristics for the thin surface course systems are specified in contract specific Appendix 7/1 the SIPT shall include the assessment and measurement of noise characteristics as described in sub-Clauses 34 to 43 of this Clause. The declared level shall be 0 to 3 or 'NR' as given in Table 9/17.</p> <p>TABLE 9/17: (05/18) Road/Tyre Noise Levels</p> <table> <tr> <th>Level</th><th>Equivalence to Traditional Surfacing Materials</th><th>Road Surface Influence RSI</th></tr> <tr> <td>3</td><td>Very quiet surfacing material</td><td>-3.5 dB(A)</td></tr> <tr> <td>2</td><td>Quieter than HRA surfacing materials</td><td>-2.5 dB(A)</td></tr> <tr> <td>1</td><td>Equivalent to HRA surfacing materials</td><td>-0.5 dB(A)</td></tr> <tr> <td>0</td><td>Noisier than HRA Surfacing Materials</td><td>+1.2 dB(A)</td></tr> <tr> <td>NR</td><td>No requirement</td><td>No requirement</td></tr> </table>	Level	Equivalence to Traditional Surfacing Materials	Road Surface Influence RSI	3	Very quiet surfacing material	-3.5 dB(A)	2	Quieter than HRA surfacing materials	-2.5 dB(A)	1	Equivalent to HRA surfacing materials	-0.5 dB(A)	0	Noisier than HRA Surfacing Materials	+1.2 dB(A)	NR	No requirement	No requirement	
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NR	No requirement	No requirement																		
Whether the SOAEL, LOAEL levels for	SCC concurs with East Suffolk Council's comments on the Applicant's Initial Statement of Common Ground [REP5-138], The Applicant's assessment	SCC Infrastructure Asset Management Policy and Strategy																		

<p>construction, traffic, rail noise and vibration are set at appropriate levels.</p>	<p>approach has substantially changed since pre-application consultation and significantly different LOAELs and SOAELs have been adopted in the ES. This approach also differentiates SOAELs from the levels identified as significant in EIA terms. SCC supports ESC's focus on practical measures to minimise and mitigate noise impacts as far as possible and is therefore generally prepared to accept the LOAEL and SOAEL values in the ES for construction, traffic, rail noise and vibration provided the various issues relating to practical controls discussed under agenda item 5, are addressed.</p> <p>In the case of road traffic noise, the SOAELS and LOAELS are aligned with traceable standards for road traffic noise and therefore accepted.</p> <p>In the hearing Saxmundham Town Council asked about the current surfacing on the A12 adjacent to the town. Generally, SCC resurfaces roads with surface dressing, hot rolled asphalt (HRA) or thin surfacing. Of these HRA is considered a benchmark with surface dressing being noisier and thin surfacing being quieter. Note this applies to tyre / road noise and not other sources such as transmission noise.</p> <p>SCC's Infrastructure Asset Management Policy and Strategy do not include commitments that require the authority to use or maintain low noise surfacing. Nor is it practical for the authority to commit to do so within the constraints of highway maintenance funding.</p> <p>SCC has responded to Mr Hiley on these matters.</p>	<p>https://www.suffolk.gov.uk/roads-and-transport/highway-maintenance/highway-asset-management/</p>
<p>Whether higher standards of protection are appropriate in light of the potential length of the construction period</p>	<p>The engineering proposals for mitigation in the ES are non-specific. SCC considers that quiet road surfaces with associated maintenance funds (for new and existing roads) and noise bunds (new roads) should form part of the mitigation measures incorporated into the detailed design of the road schemes, in order to meet EN-1 and NPSE policy aims to minimise and mitigate noise above LOAEL.</p> <p>Of particular concern to the Council is the duration of SZC construction traffic passing through Marlesford and Little Glemham as these communities do not benefit from the proposed Two Village Bypass. The applicant has made a</p>	

	<p>proposal to the Parish Council and SCC to install lower noise surfacing in the built-up areas. This would be acceptable to the Council provided that it is adequately maintained throughout the SZC construction phase. We understand that this will be secured through the Deed of Obligation, an updated draft that will be submitted by the applicant at D7.</p> <p>Although the potential exposure to traffic noise on the B1122 and in Yoxford is restricted to the early years this is still potentially 30 months and the Council is in discussion with the applicant regarding the appropriateness of quieter surfacing at these locations.</p> <p>Note: SCC cannot commit to maintain low noise surfacing on new or existing roads beyond the SZC construction phase. However, the SZC related traffic on these roads will significantly decrease during the operational phase.</p>	
<p>Operational noise at the MDS and traffic noise from the new roads</p>	<p>New roads</p> <p>The engineering proposals for mitigation in the ES are non-specific. SCC consider that quiet road surfaces with associated maintenance funds (for new and existing roads) and noise bunds (new roads) should form part of the mitigation measures incorporated into the detailed design of the road schemes, in order to meet EN-1 and NPSE policy aims to minimise and mitigate noise above LOAEL. [RFI 41, REP6-032].</p> <p><u>SOCG: Operation – Prediction (new roads)</u></p> <p>SCC raised two queries with The Applicant regarding the road traffic noise prediction methodology (RFI 15, RFI 16). The Applicant provided clarification and SCC are now satisfied that the prediction methodology is appropriate.</p> <p><u>SOCG: Operation – criteria (new roads)</u></p> <p>The assessment criteria for changes in road traffic noise are derived from DMRB. Absolute LOAEL and SOAEL values were also adopted from DMRB. SCC considers the criteria appropriate.</p> <p>SCC note the policy aim in NPS EN-1 to mitigate adverse effects above LOAEL and to avoid significant adverse effects above SOAEL. This means mitigating noise at source through the implementation of quiet road surfacing, road noise</p>	

	<p>barriers and landscaping as a first option before noise insulation is offered to residents.</p> <p>SCC consider that there are number of locations where the operational noise on new roads would trigger the policy requirement to “<i>mitigate and minimise</i>” adverse effects and “<i>avoid</i>” significant adverse effects and expect that eligibility for the Noise Mitigation Scheme would be triggered if avoidance of the SOAEL cannot be achieved through engineering solutions.</p> <p>Although traffic noise is generally lower in the operational phase, particularly for the SLR the following locations experience the greatest increase in noise during the operational phase:</p> <ul style="list-style-type: none"> • Two Village Bypass; • Pond Hall Cottages; • Farnham Hall and surrounding properties; • SLR; and • Oakfield House. <p>SCC requires that the Applicant makes a commitment to mitigate noise through engineering as a primary stage in its Draft Noise Mitigation Strategy, as well as clarify the process for monitoring and mitigating road noise.</p> <p>In terms of engineering this may include (in order of preference), designing out issues, noise bunding (on third party land), noise bunds on highways, acoustic fencing, lower noise surfacing. While the authority appreciates that noise on third party land is less secure and places the onus for maintenance on others it notes that this is the Network Rail preference stated by SZC Co. in the hearing. Note that SCC cannot guarantee that lower noise surfacing will be maintained beyond the end of SZC construction phase (2034). SCC would except long term maintenance of acoustic bunds.</p>	
Agenda Item 3 – The implications of the traffic noise from the Proposed Development during construction and operation		

The early years	<p>SCC are awaiting confirmation of the number of receptors along existing roads where increases in road traffic noise will trigger the Noise Mitigation Scheme (based on the originally and revised thresholds).</p> <p>SCC consider that quiet road surfaces (with associated maintenance funds) should be used on existing roads in situations where construction traffic causes the LOAEL to be exceeded, particularly during the early years. This is considered necessary in order to meet EN-1 and NPSE policy aims to minimise and mitigate noise above LOAEL. [RFI 41, REP6-032].</p> <p>SCC accept the 300 HDV (600 movement) cap on the B1122 in the early years subject to agreement of the B1122 early years mitigation and the B1122 maintenance contribution. SCC accept the proposal for a quarterly average daily HDV flow that is monitored and controlled through the TRG.</p> <p>The authority maintains its position that HGVs should be prohibited on the highway network between the hours of 2300 and 0700 not just prohibited from entering or leaving the main site.</p> <p>In terms of delivery, the authority recognises the urgency of the project but considers its stance, as stated in LIR REP1-045 that roundabouts and other connections to the existing road network should be completed before any significant HGV movements occur to avoid undue delays or disturbance to local communities, project traffic and other road users.</p>	
Traffic Noise upon completion of SLR, and at the P&R sites	<p>SCC consider that quiet road surfaces with associated maintenance funds and additional noise bunds should form part of the mitigation measures incorporated into the detailed design of the road schemes, in order to meet EN-1 and NPSE policy aims to minimise and mitigate noise above LOAEL. [RFI 41, REP6-032].</p>	
Effect of shift patterns and freight management strategy	<ul style="list-style-type: none"> Shift patterns would only have an effect on lighter vehicles. Rather than secure shift patterns SCC has a greater interest in monitoring actual trips originating to or from the MDS, P&R sites and FMF to ensure these 	

	<p>are within the modelled assumptions and the impacts assessed in the ES (including noise) remain valid.</p> <ul style="list-style-type: none"> The County's position is that HGV movements should be prevented on the highway network at night, not just to and from the main site (REP3-079). The latter does not prevent drivers of HGV stopping on the local network and resuming a journey between 2300 and 0700. <p>Table 3.1 of the CWTP (REP2-055) shows 600 workers arriving at the main site by P&R bus and another 600 by direct buses. The former will, until the southern and northern park and rides are operational, originate from the temporary park and ride at the LEEIE site. The direct buses are understood to originate from the local area (Leiston, Knodishall, Aldeburgh etc) with a limited number of trips from Lowestoft and Ipswich. The majority of these buses will use Lovers Lane to shuttle between LEEIE and the Main Site (secondary entrance) or the B1122/B1121/B1069 to the south of the site. There would also be car trips on all roads associated with workers accessing the temporary park and ride at the LEEIE including those on night shifts.</p> <ul style="list-style-type: none"> There is potentially a short period of around 6 months when the southern and northern park and rides become operational, but the SLR is not open. While the numbers of buses will be included in the 300 HDV (600 movement) cap for the B1122 it is understood that there are currently no controls in terms of overnight bus movements. Changes in proportion of transport modes in the FMS will alter the number of HGV, train and ship movements but SZC Co have in terms of HGVs assessed a maximum capped volume of HGVs (early and peak years) and this is accepted by SCC. 	
Agenda Item 4 – Night Time Rail Noise		
Whether the operation of the rail freight as proposed is an appropriate mechanism for delivery of the proposed development	<p>ESC lead</p> <p>SCC recognises ES'sC concerns regarding the impact of night-time rail movements and strongly supports its position that robust assessment is necessary with suitable thresholds of impact to identify mitigation and that this is imperative to make overnight rail movements acceptable. SCC supports ESC position that mitigation should be to remove or reduce the noise and vibration</p>	

	impacts at source e.g. continuously welded rail, track bed pad noise dampening, speed reductions as proposed in the Rail Noise Mitigation Scheme. SCC is aware of the tensions between overnight rail (noise, vibration, air quality) and daytime HGV movements (noise, vibration, air quality, road safety, severance, air quality, fear and intimidation) and is working with ESC and the Applicant to agree a mitigation package that minimises the overall impacts of construction traffic across all modes of transport.	
Agenda Item 5 – Mitigation and controls including: (a) The Code of Construction Practice (CoCP), (b) Noise Monitoring and Mitigation Plan (NMMP), (c) Noise Mitigation Scheme (NMS) and (d) Rail Noise Mitigation Strategy (RNMS): (e) Working Hours		
a) The Code of Construction Practice (CoCP),	SCC accepts it will be consulted in schedule 23 of the DCO on any changes to the CoCP and by inclusion within this the Noise Mitigation Strategy	
(b) Noise Monitoring and Mitigation Plan (NMMP),	ESC lead	
(c) Noise Mitigation Scheme (NMS) and	It is SCC's understanding that the recent revisions to the NMS will significantly reduce the number of properties eligible for insulation under the NMS. Specifically, properties along A12. SCC has requested details of the specific number of receptors along existing roads where increases in road traffic noise will trigger the Noise Mitigation Scheme (based on the originally and revised thresholds).	
(d) Rail Noise Mitigation Strategy (RNMS):	ESC lead	
e) Working Hours	See also SCC comments on timing of HGV movements above	
Delivery and timing of primary, secondary and tertiary mitigation	It is not clear from the most recent Statement of Common Ground between The Applicant and Network Rail [REP5-095] whether the mitigation measures set out in the Rail Noise Mitigation Strategy are deliverable. As primary mitigation	

referred to throughout the ES.	the outcomes of the rail noise assessment are reliant on all measures in the RNMS being deliverable in full. SCC's position is that mitigation should be in place in advance of the impact. For early years this would require mitigation to be in place prior to commencement. Details of delivery of mitigation within Associated Development sites would be agreed during technical approval.	
Suitability/enforceability of alternative to Section 60 and Section 61 of the Control of Pollution Act 1974 Procedure	ESC lead	
Whether any additional requirements, would be necessary to address adverse noise and vibration affects and whether the ExA should disapply the defence of statutory authority in whole or in part?	ESC lead	
Agenda Item 6 – Air Quality		
Methodology of assessment and whether methods used are appropriate to ensure that the Proposed Development will meet the highest environmental standards both during construction and operation	ESC lead	

PM10 and PM2.5 and NOx Action levels, monitoring locations and reporting procedures	ESC lead	
Agenda Item 7 – Dust mitigation		
Standard that would be enforceable, how monitored and managed to ensure standard is achieved, consequences when/if it is not.	ESC lead	
Agenda Item 8 - Stratford St Andrew and Woodbridge AQMA		
Assessment of baseline conditions and subsequent monitoring during construction	ESC lead	
Whether mitigation offered would ensure policy requirements are met	<p>ESC lead but monitoring and enforcement of HGVs and Emission class would fall within the CTMP and hence the remit of TRG.</p> <p>Woodbridge AQMA: SCC accepts transport strategy discourages SZC traffic passing through the Woodbridge AQMA, that SZC HGVs are prohibited and therefore there should not be a risk that emissions are increase by the SZC project. However, for certainty the council is awaiting scenario testing of the TIMP to ensure that the risk of traffic being diverted through Woodbridge during an incident has been addressed.</p>	
Agenda Item 9 – Mitigation and Controls including; (a) The Code of Construction Practice (CoCP), (b) Outline Dust Management Plan (c) Construction Traffic Management Plan (CTMP) (d) Construction Worker Travel Plan (CWTP) (e) Percentage of NMMP at highest standards of environmental control		

(f) Percentage of HDV at highest standards of environmental control		
Whether any additional requirements, would be necessary to address adverse air quality affects and whether the ExA should disapply the defence of statutory authority in whole or in part?	<p>ESC Lead but SCC supports additional NO₂ monitoring in Stratford St Andrew AQMA.</p> <p>Monitoring within the CTMP and CWTP is a matter of ongoing discussion between SCC/ESC and SZC Co. A key remaining issue is agreement on monitoring of park and ride sites (including site campus). The LHA considers permanent ATCs at the site entrances would provide suitable data to monitor actual trips against forecast to show that the assumptions in the TA and ES continue to be valid. SZC Co consider their proposals of weekly surveys every quarter are sufficient, so this is not agreed.</p> <p>SCC accept SZC Co's proposals in to increase the proportion of electric charging points in the park and ride sites from 5% to 20% and the same proportion of parking spaces that will be provided with infrastructure to allow installation of charging points in the future. SCC looks forward for inclusion of these revisions in the updated Construction Workers Travel Plan. SCC has recommended that this proportion should be increased to 25% for the site accommodation campus, in line with the authority's guidance for hotels.</p>	
Agenda Item 10 – Any other matters relevant to the agenda		
	EV charging: review of demand with commitment for SZC to install charging points if demand is there secured via the CWTP	