

The Sizewell C Project, Ref. EN010012

Suffolk County Council's responses to the Examining Authority's written questions and requests for information (ExQ2)

Suffolk County Council Registration ID Number: 20026012

Deadline 7, 3 September 2021

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ExQ2	Question to:	Question:
G.2 General and Cross-topic Questions		
G.2.14	The Applicant, SCC, ESC	<p>Policy and Need The ExA's ExQ1 G.1.12 questioned whether the Planning Statement [APP-590], paragraph 3.9.2, was correct to state that it was appropriate to treat EN-1 and EN-6 as providing the primary policies relevant to the determination of the application. The responses to that ExQ1 from the Applicant, ESC and SCC together with the Applicant's comments on the responses received from ESC and SCC are noted [REP3-046]. In the decision dated 19 February 2021 relating to the application for the Wheelabrator Kemsley K3 Generating Station and Wheelabrator Kemsley North Waste-To-Energy Facility Order the Secretary of State for Business, Energy and Industrial Strategy, at paragraph 6.3, states: "As set out above, sections 104 and 105 of the Planning Act 2008 set out the procedures to be followed by the Secretary of State in determining applications for development consent where National Policy Statements have and do not have effect. In both cases, the Secretary of State has to have regard to a range of policy considerations including the relevant National Policy Statements and development plans and local impact reports prepared by local planning authorities in coming to a decision. However, for applications determined under section 104, the primary consideration is the policy set out in the National Policy Statements, while for applications that fall to be determined under section 105, it is local policies which are specifically referenced although the National Policy Statements can be taken into account as 'important and relevant considerations'." It is recognised that there are obvious differences on the facts between that particular case and the Sizewell C Project application. Nevertheless, further comments are sought on the principle of the approach to the primacy of policy in a s105 case, as expressed by the Secretary of State in that decision.</p>
	SCC response at Deadline 7	<p>SCC observes that the Wheelabrator decision cited in the question provides an example of the Secretary of State exercising his reasonable discretion in balancing the weight to be attached to local policy and the relevant NPSs in the way described in our response to G.1.12. Whilst s.105 PA 2008 does not in terms refer to local policies, it does refer directly to local impact reports, which would be expected to address local policies. SCC therefore believes that its comments made in response to G.1.12 remain a correct reading of the position.</p> <p>Noting the Applicant's reference to language within NPS EN-1 in their comments on responses to G.1.12 for Deadline 2 [REP3-046], SCC maintains that there is no automatic primacy to be given to NPS policies in a case under s.105 PA 2008 where (by definition) those NPS policies do not 'have effect' in relation to the particular proposal. SCC submits that it is a matter of planning judgment for the decision maker, having regard to the content and relevance of the particular policy statements in question, whether more weight should be given to a local policy or to an NPS policy in the event that they contain divergent guidance. This issue is also further addressed in SCC's Post Hearing Submission at Deadline 7 for ISH9 in relation to Agenda Item 5.</p>

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ExQ2	Question to:	Question:
AQ.2 Air Quality		
AQ.2.1	SCC, ESC	<p>Electric Charging Points</p> <p>(i) What policies do SCC and ESC rely upon to encourage or require electric charging point provision?</p> <p>(ii) Is the number currently proposed policy compliant?</p>
	SCC response at Deadline 7	<p>(i) Suffolk County Council have an electric vehicle charging guidance in place for parking at residential and non-residential developments in section 3.4.2 of the Suffolk Guidance for Parking (SGfP), which can be found at the following link: https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf. The guidance considers that 'Local planning authorities will take into account this technical guidance in their planning decisions; as such it will be a material document in planning considerations'.</p> <p>(ii) In the response to ISH3 [REP5-174] SCC made the following comment:</p> <p><i>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. 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).</i></p> <p>In the CTWP REP2-055 the applicant is only proposing 5% of the spaces to have charging points and a further 5% to have passive electric vehicle provision. Therefore, the measures proposed by SZC do not comply with the SCC Parking Guidance.</p> <p>At ISH8 Agenda Item 9 (see 1:21:46 of [EV-169]) SZC Co verbally committed to providing 20% of the parking spaces to with electric charging points and infrastructure for a further 20% within the park and rides. Subject to approval of the details in writing this would be acceptable to SCC. Details of the charging at the site campus are still to be agreed but the Council has indicated this should be 25% charging points plus 25% additional parking spaces with infrastructure to install electric charging at a later date as stated in the SCC parking guidance for hotels.</p>
AQ.2.2	Applicant, ESC, SCC	Air Quality Management Areas (AQMAs)

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ExQ2	Question to:	Question:
		<p>There does not yet appear to be an agreed position in respect of the likely effects in terms of emissions from construction traffic on the air quality standards within the two AQMAs at Woodbridge and Stratford St Andrew.</p> <p>(ii) Please advise the ExA of the latest position and what controls may be put in place to ensure the air quality in both areas is maintained at suitable levels throughout the construction programme.</p> <p>(ii) The ExA understand a commitment has been made by Scottish Power to limit the number or proportion of HGVs which do not meet the highest emissions standards. If this is correct, in light of the higher number of vehicles associated with this development is it not reasonable to expect a similar restriction for this development, or an even higher standard in light of the higher numbers of vehicles?</p> <p>(iii) In the event a commitment is made to ensure a proportion of the 'cleanest' vehicles is made, how would this be secured, monitored, and managed throughout the construction programme?</p>
	SCC response at Deadline 7	<p>(i) Woodbridge AQMA:</p> <p>SCC accepts that the Applicant's transport strategy discourages SZC traffic passing through the Woodbridge AQMA, that SZC HGVs are prohibited (Construction Traffic Management Plan (REP2-054) 4.4.3 and 4.4.4) and therefore there should not be a risk that emissions are increased 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> <p>(i) Stratford St Mary AQMA</p> <p>SCC has accepted in the SOCG AQ5 (to be submitted at D7) that the potential effects of emissions impact within the Stratford St Andrew Air Quality Management Area have been adequately assessed. It is also agreed that the approach to Euro VI compliance has been agreed (see (iii)) for construction vehicles accessing the development and SZC Co. have agreed to continue supporting ESC monitoring of nitrogen oxides in the AQMA.</p> <p>(ii) Scottish Power Renewables (SPR)</p> <p>SPR has made a commitment to manage HGV emissions for the EA1(N) and EA2 projects. This is included in the Construction Traffic Management Plan section 5.1.5.</p> <p>https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf</p>

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ExQ2	Question to:	Question:
		<p>(iii) Emission standards</p> <p>The commitment for HGV emission controls is contained in the Construction Traffic Management Plan (REP2-054) 4.4.45 and 4.4.46. SCC understands that this will be updated at D7 to confirm 92% of SZC HGVs (including associated development sites) will comply with EURO VI standards and the remainder with EURO V and that compliance will be monitored through the DMS and reported to the TRG.</p> <p>SCC is seeking clarity regarding the definition of local traffic and / or local suppliers to ensure that the air quality impacts of this traffic is understood (as AQ 2.4).</p>
AQ.2.4	Applicant, ESC, SCC	<p>CoCP</p> <p>As currently drafted, there is an exemption for 'community/local suppliers' in the standard of vehicle that may be allowed.</p> <p>(i) How is the community/local supplier defined?</p> <p>(ii) Do the mechanisms for monitoring ensure that these operators can be clearly identified?</p> <p>(iii) In seeking to support local suppliers in this way can the air quality standards that need to be achieved still be met?</p>
	SCC response at Deadline 7	<p>i) The Council consider that this should be defined within the CoCP and the Deed of Obligation.</p> <p>ii) No. SCC has requested that the Applicant defines local supplier, specifically in terms of HGV and LGVs. The Council is concerned that the controls and monitoring applied to movements to the main site and associated development sites may not be applied to local deliveries.</p> <p>iii) EURO V emissions date from 2008. Data from https://www.statista.com/statistics/1203363/uk-licensed-hgvs-by-age/ suggests that 20% of HGVs are likely to predate this date. As newer vehicles complying with EURO V and VI are likely to be concentrated adjacent to low emission zones there is a risk that local suppliers in Suffolk are operating elderly HGVs. SCC is willing to work with the applicant to support and incentivise local suppliers to invest in newer vehicles compliant with EURO VI.</p>
AI.2.0 Alternatives		
AI.2.0	The Applicant, SCC	<p>Strategic alternatives for the movement of freight</p> <p>The Applicant, in comments on the response by SCC to ExQ1 AI.1.10 [REP3-046] states that the constraints at Sizewell compared to the situation at Wylfa do not make the scale of marine intervention proposed at Wylfa practical. The Applicant has also provided its comments on the LIR [REP3-044] in</p>

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ExQ2	Question to:	Question:
		<p>relation to the Councils' position that SZC Co. has not fully explored the maximisation of delivery of materials by modes other than road and is not matching the aspirations of other nuclear projects.</p> <p>(i) Does SCC now accept that the increased proportion of sea-borne transport set out in the change to the application represents the upper limit that could reasonably be achieved?</p> <p>(ii) Should and, if so, how would the increase proportion of sea-borne transport set out in the change to the application be secured by the DCO?</p> <p>(iii) Please clarify and update the position in relation to the deliverability and timing of the additional train movements and the timing of the construction of the second BLF.</p> <p>(iv) Please specify how the mitigation of adverse impacts of the transport strategy would be monitored and controlled by the DCO requirements.</p> <p>(v) The Applicant's LIR comments indicate that for the permanent BLF weather conditions would impact the ability to use such a facility to the extent that during the winter months the deck of the facility is demobilised thereby removing the ability to use it for circa 5 months of the year. What would be the percentage material transported by road for this five month period?</p> <p>(vi) The Applicant also indicates that in relation to the temporary marine bulk import facility (MBIF) for the delivery of bulk materials during the construction phase, weather conditions have the potential to impact the ability to use such a facility all year around. Taking account of weather conditions what percentage of materials can reliably be transported using the marine option facilities?</p>
	SCC response at Deadline 7	<p>i) SCC considers that there may be opportunities to further increase the proportion of sea-borne transport, particularly in the later phases of construction. SCC accepts that it would be at this point unreasonable to have a requirement for a higher proportion of sea-borne transport, but would expect an aspiration in the CTMP for the Applicant to fully investigate and implement a maximisation of sea borne transport wherever possible. For example, if during the winter months sea conditions are milder than typically experienced, this could create opportunities for increased use of the beach landing facilities. SCC seeks for the Applicant to regularly report on this matter to the Transport Review Group.</p> <p>ii) Throughout the construction phase there would be a forecast of the modal split, this could be monitored by the TRG. The forecast should include a profile of materials by mode, with aspirations that the proportion of materials transported by sustainable modes remains above the forecast or potential corrective actions are identified where practicable. The Council's preference is that delivery of the supporting infrastructure ie beach landing facility is secured against commencement of phase 2 of the construction program to ensure that these are available at the relevant time.</p>

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ExQ2	Question to:	Question:
		<p>iii) The Council is awaiting further information from the Applicant to demonstrate that this is achievable.</p> <p>iv) The transport impacts are controlled and monitored through the measures set out within the CTMP, CWTP and TIMP, which are in turn secured by the Deed of Obligation. However, the details of some of these measures are under discussion.</p> <p>v) The Council considers that this is for the Applicant to answer.</p> <p>vi) The Council considers that this is for the Applicant to answer.</p>
AR.2 Amenity and recreation		
AR.2.0	The Applicant, SCC (point ii and v)	<p>PROW</p> <p>(i) [REP3-013] The Rights of Way Access Strategy provides plans at a very large scale of the existing and proposed coastal path routes, however, the Access and Rights of Way Plans [REP2-007] at a scale of 1:2,500 show greater clarity is it correct to assume the plans shown in [REP2-007] take precedence?</p> <p>(ii) Do SCC seek more detailed plans than those shown in [REP2-007] for the alignment of the coastal path, if so, what scale would you anticipate being appropriate?</p> <p>(iii) In light of the ongoing concerns raised by SCC and supported by ESC in the LIR [REP1-044] and in answer to FWQ AR1.7 what is the current situation with regard to the proposed route of the coastal path and the consequential future maintenance of this important route?</p> <p>(iv) It would appear a further iteration of the Rights of Way and Access Strategy is to be provided to address the concerns raised in the responses to FWQ AR1.7, while a revised version has been received [REP3-013] this does not appear to respond to the points referred to by SCC and responded to in the WR response from the Applicant. When is this proposed to be submitted to the Examination?</p> <p>(v) Has clarification been provided from SCC regarding "the changes proposed for the management of access to the coast" in their response to AR1.7?</p>
	SCC response at Deadline 7	<p>ii) SCC is satisfied the Access and Rights of Way Plans Rev 6.0, which are at a scale of 1/2500, will be able to show the alignment of the coast path</p> <p>v) AR.1.7 Response (i) 3 reads: "The Strategy needs to be updated to reflect the changes proposed for the management of access on the coast by SCC". SCC's Rights of Way& Access SZC case officer has been away from work for some weeks, but the changes proposed are assumed to relate to a) the establishment of the England Coast Path, where the defined trail and extent of spreading room is still at</p>

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ExQ2	Question to:	Question:
		the determination stage with the Secretary of State and b) SCC's contention FP21 should be aligned on top of the coastal defence, rather than on the seaward side.
AR.2.1	Applicant, SCC	<p>Footpath Implementation Plan (FIP)</p> <p>(i) SCC suggest in response to AR1.7 that the current FIP process is not appropriate. Has progress been made in resolving the differences in how and through what mechanism the FIP should be secured? Please advise of the latest position.</p> <p>(ii) If SCC remain of the view this should be a revised requirement, has a proposed wording been prepared, please provide this to the Examination.</p>
	SCC response at Deadline 7	<p>i) At AR.1.7, SCC stated its concern the FIP will be produced post consent and will not be a robust enough document to ensure that the routes being provided as embedded mitigation will be acceptable. SCC further noted the FIP is not secured by a requirement and therefore not bound by Schedule 23 leaving any disagreement to be determined by arbitration. Little has changed since, but SCC will continue to work with SZC Co to develop the FIP, as it will for the Rights of Way and Access Strategy (also not concluded).</p> <p>ii) SCC is not aware of any proposed wording having been prepared.</p>
AR.2.2	Applicant, ESC, SCC	<p>Leiston Sports Facilities</p> <p>Within the Deed of Obligation [REP5-083] page 60 para 2.2.6 reads "If all requisite consents for the Leiston Sports Facilities cannot be obtained, East Suffolk Council shall repay the remainder of the Sports Facilities Works Contribution to SZC Co and enter into discussions in good faith about the appropriate provision of alternative facilities."</p> <p>(i) What additional consents are required?</p> <p>(ii) In the event they are not granted how would the recreational provision be provided?</p> <p>(iii) The wording suggests there remains some doubt as to the provision of the facility, yet it has been included as primary mitigation in the ES assessment [Section 15.5 APP267]. Please clarify the situation</p>
	SCC response at Deadline 7	<p>(i) Refer to [REP6-050] setting out SCC issues as the landowner and the local education authority in respect of Alde Valley Academy which is the proposed location for the new sports facilities; which need addressing by the Applicant and ESC. The Secretary of State for Education will need to provide prior written approval for 'disposal' or 'change of use' of the education land under section 77 of the Schools Standards and Framework Act 1998. Following the CAH, the Department for Education (DfE) have provided a written submission for D7 which clarifies the matter for the ExA. SCC has suggested to the</p>

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ExQ2	Question to:	Question:
		<p>Applicant that the following wording is added to article 37 (temporary use of land for carrying out authorised development) of the DCO - "() Nothing in this article affects any requirement for the consent of the Secretary of State to be provided for the change of use of a playing field under section 77 of the School Standards and Framework Act 1998."</p> <p>(ii) Subject to the issues identified by SCC in [REP6-050] (and subsequently confirmed by the DfE) being adequately addressed by the Applicant/ESC there is, in principle, no objection to the new sports facilities being provided on the Alde Valley Academy site. However, if consent is not forthcoming from the Secretary of State, then this is a matter for the Applicant and ESC to advise on alternative options for the delivery of recreational facilities in Leiston.</p> <p>(iii) This is a matter for the Applicant.</p>
AR.2.3	Applicant, ESC, SCC	<p>Public Sector Equality Duty</p> <p>In response to FWQ AR1.27 ESC identified that concerns remained over whether all potential impacts had been properly identified for people with protected characteristics and consequently whether mitigation appropriate to those individuals/groups had been identified. Additionally, SCC did not consider there had been a comprehensive assessment in relation to community safety or community cohesion.</p> <p>(i) Can each party please provide an update on your positions to inform the ExA as to the suitability of the assessments, the conclusions reached, and the mitigation offered.</p> <p>(ii) Please advise on the latest positions in the discussions on the establishment of the Public Service Resilience Fund and Community Funds and whether these now have elements within them to address the concerns identified for people with protected characteristics?</p>
	SCC response at Deadline 7	<p>(i) SCC continues to have ongoing productive discussions with the Applicant to identify appropriate mitigation requirements for these issues. SCC considers that measures and funding agreed with the Applicant, and to be included in the Deed of Obligation (DoO), will be able to appropriately mitigate impacts on people with protected characteristics and protect public services from additional burdens which would affect people with protected characteristics</p> <p>(ii) As above, - ongoing discussions with the Applicant suggest that the parties are close to agreeing matters on mitigation requirements for the Public Services Resilience Fund and the Community Fund, which will contain elements to address the concerns identified for people with protected characteristics (e.g. the Public Services Resilience Fund covers contributions to adult and children's services, community safety, schools and early years settings).</p>
Bio.2 Biodiversity and ecology, terrestrial and marine		

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ExQ2	Question to:	Question:
Bio.2.1	Natural England, ESC, SCC	Please will Natural England, ESC and SCC set out their views on (a) the need and reasons for wet woodland compensation and (b) any concerns they have over establishing wet woodland
	SCC response at Deadline 7	<p>SCC would refer the ExA to comments set out in the LIR [REP1-046] at para 8.37, which remain pertinent, in addition to our further comments below.</p> <p>(a) Wet woodlands are an important complement to the fen meadow which comprises the greater part of the Sizewell Marshes SSSI and should be considered an 'associated habitat' to the wet grasslands mentioned in the SSSI citation. Wet woodlands provide diversity to associated habitats and support a wide variety of flora and fauna in combination with these. As well as the important association with the Sizewell Marshes SSSI, wet woodland is also a Priority Habitat for the UK Biodiversity Action Plan and for the Suffolk Biodiversity Partnership.</p> <p>(b) Wet woodland is not easy to establish, as it requires specific hydrological conditions in terms of quantity and quality of water. It also takes a considerable amount of time to mature to provide optimal ecosystem services, which means that full benefits are necessarily delayed from the initiation of a compensation programme.</p>
Bio.2.25	Applicant, ESC, SCC	Bio.1.145 - The draft non-licensable method statement is referred to. Attention is drawn to the ExA's comments on this in commentary on the DCO issued with these ExQs2.
	SCC response at Deadline 7	SCC defers to ESC on this issue.
CA.2 Compulsory acquisition		
CA.2.14	The Applicant, SCC	<p>Adequacy of the protective provisions set out in the draft DCO and the need for any other protective provisions to protect relevant interests</p> <p>The Applicant's response to ExQ1 CA.1.67 [REP2-100], and its response to the comments on those question responses [REP5-129], records that the parties are working to ensure that the draft DCO provisions as a whole adequately secure the highway works.</p> <p>(i) Please provide an update on progress and indicate whether this will take the form of a set of Protective Provisions to be inserted as a schedule to the DCO.</p> <p>(ii) Please also clarify the position in relation to the Protective Provisions additionally sought by SCC for other topic areas.</p>

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ExQ2	Question to:	Question:
	SCC response at Deadline 7	<p>(i) SCC submitted draft protective provisions for the highway authority at D6 [REP6-050]. The Applicant is currently not minded to include those provisions in the dDCO. Discussions are ongoing between SCC and Applicant to see whether amendments to articles 20 (construction and maintenance of new and altered streets) and 21 (agreements with street authorities) could give SCC sufficient comfort so that SCC considers protective provisions are not necessary. In the meantime, SCC maintains its position that protective provisions are required.</p> <p>(ii) SCC is not seeking protective provisions for other topic areas.</p>
Cu.2 Cumulative impact		
Cu.2.0	The Applicant, SCC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The DL5 response by SCC to additional submissions from the Applicant comments on the response provided to ExQ1 TT.1.133 [REP5-172] states, in relation to the assessment of cumulative transport impacts, that the Applicant has been working with SCC to address its concerns on the environmental assessment of road traffic. Please indicate whether this work has been completed and whether the position in relation to cumulative traffic impact and any additional mitigation that would be required is now agreed?</p>
	SCC response at Deadline 7	<p>The workstream is ongoing; the Applicant has worked with SCC to address our concerns; however, a revised version of the ES is under preparation by the Applicant, and we understand that this work is imminent, but will require review by SCC. For ease of reference, SCC will set out any areas of disagreement once we have a final submission of the ES; however we do not currently expect any areas of disagreement.</p>
Cu.2.6	The Applicant, SCC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL5 response to responses on Ex1 Cu.1.18 [REP5-129]. The Applicant's DL2 response includes Appendix 13A – update to cumulative effects assessment [REP2-110].</p> <p>(i) Since the preparation of Appendix 13A has any further information come to light in relation to the Nautilus Interconnector, the Eurolink Interconnector or other projects that would require the assessment to be updated?</p> <p>(ii) Has any further progress been made in relation to the traffic management necessary to deliver the associated development and how that would be secured?</p> <p>(iii) Please provide an update in relation to the timing of the delivery of the proposed Yoxford roundabout and whether that is agreed?</p>

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ExQ2	Question to:	Question:
	SCC response at Deadline 7	<p>i) We are not aware of further information for these projects having become available at this point in time.</p> <p>In respect of the Nautilus interconnection project, it is understood that National Grid Ventures intend to hold a non- statutory consultation on their proposals for 6 weeks from Tuesday 14 September – Tuesday 26 October. However, (subject to sight of the published content) SCC believes that the information likely to be contained within this consultation is at pre EIA Scoping stage, and therefore is unlikely to be sufficient to warrant a change in the SZC cumulative assessment. No further information or change to the Eurolink project is known at this stage.</p> <p>ii) An initial meeting has been held with the Applicant and SCC is willing to participate in future meetings.</p> <p>iii) The proposed delivery is included in the Implementation Plan. The Council has a long standing position that this roundabout should be delivered as soon as practical to avoid disruption of traffic (including Sizewell C construction traffic) on the A12 and B1122.</p>
CI.2 Community Issues		
CI.2.0	ESC, SCC	Clarification Within the LIR [REP1-045] on page 399 para 28.26 you refer to CYDS. What is this, it does not appear in the Glossary of Terms?
	SCC response at Deadline 7	The CYDS Project, also known as Young People Taking Action, is a drop-in centre in Leiston which offers advice support and guidance to young people.
CI.2.1	ESC, SCC	<p>Accommodation Strategy</p> <p>The Applicant in response to the LIR and the concerns raised at ISH4 in respect of the delivery of the accommodation campus and the caravan site at the LEEIE consider that it would not be appropriate to limit worker numbers as a mechanism to ensure timely delivery of the accommodation campus. In [REP3-044] the Applicant sets out their detailed arguments as to why this is considered inappropriate (paras31.2.5 onwards).</p> <p>(i) Do you agree that the assessment of the gap between the availability of project accommodation and the total amount of accommodation required would not exceed the amount of spare capacity available in the 60-minute area?</p> <p>(ii) Are there particular concerns for a smaller geographical area, reflective of the likely greater pressure on accommodation the nearer to the site you are?</p>

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ExQ2	Question to:	Question:
	SCC response at Deadline 7	SCC defers to ESC on matters relating to accommodation.
CI.2.3	Applicant, ESC, SCC	<p>Accommodation Strategy</p> <p>(i) The Housing Fund it is understood is intended to support the housing market, adding a degree of resilience and support the provision of additional capacity. Please explain how this is intended to work from the monitoring of the local housing market through to ensuring that capacity is maintained and the most vulnerable are safeguarded.</p> <p>(ii) The ExA have read what has been set out in para 31.2.49 onwards of [REP3-044], but it remains unclear how this would be proactive rather than reactive.</p>
	SCC response at Deadline 7	SCC defers to ESC on matters relating to accommodation.
DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants' responses to ExQs1 (all para numbers are prefixed DCO.)		
DCO.2.0	The Applicant, ESC, SCC, Natural England, MMO	Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation
	SCC response at Deadline 7	A response to the Commentary on the DCO has been submitted by SCC in a separate D7 submission.
DCO.2.6	Applicant, ESC, SCC	1.54 – Please update the ExA on the position. In particular what are the views of the councils on fees?

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ExQ2	Question to:	Question:
	SCC response at Deadline 7	<p>SCC would seek fees to cover technical approval and supervision of highway works. Typically, these are calculated as 7.5% of the bond (tender sum for highway works plus 10%)</p> <p>https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/</p> <p>We understand that this has been agreed by the Applicant.</p> <p>Schedule 23 to the DDCO sets out the procedure for approvals, consents and appeals and largely follows the content of Advice Note 15. Paragraph 3(2)(a) of Advice Note 15 (concerning fees) is not included in Schedule 23.</p> <p>The Applicant has confirmed to SCC that fees will be covered in the Deed of Obligation. So, the Applicant accepts the principle that fees must be paid.</p> <p>While it would seem neater if the whole of the procedure for approvals, consents and appeals (including fees) was set out in the same place (i.e. in Schedule 23), SCC is content for fees to be covered in the Deed of Obligation, provided that document contains enough information about fees, particularly their level.</p> <p>At the time this response was completed, however, the latest draft of the Deed of Obligation did not cover these fees.</p>
DCO.2.7	Applicant, SCC	1.56(iv). Noted, but what about the status of the road being altered, i.e. the A12. Is the SofS or a strategic highway authority the highway authority (s.22(3)(b)? Does this affect the approach?
	SCC response at Deadline 7	<p>The A12 north of the A14 Seven Hills Interchange is a Principal Road (part of the ie PRN) maintained by SCC as the Local Highway Authority and is not part of the Strategic Road Network.</p> <p>The process by which changes to the PRN are managed is set out in</p>

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ExQ2	Question to:	Question:
		<p>Guidance on road classification and the primary route network - GOV.UK (www.gov.uk)</p> <p>Specifically;</p> <p>1.19 Under the new approach, highway authorities have four responsibilities, the authority:</p> <ul style="list-style-type: none"> • will manage all local classification and PRN decisions, ensuring that the network is adequately signed • must consult with neighbouring highway authorities (including the Highways Agency) where relevant • must keep records and inform the National Street Gazetteer, Ordnance Survey and the department of any changes • should be prepared to explain its decisions if challenged, in case of appeal <p>1.20 Within the context of these four points, authorities are free to set their own policies. Responsibility for classification decisions within an authority is generally expected to rest with the traffic manager.</p> <p>1.21 The Secretary of State retains ultimate legal responsibility for roads classification and the PRN, and retains the right to intervene.</p>
DCO.2.15	Applicant, ESC, SCC	<p>(i) Please include the TEMMPP in the documents to be certified by the SofS.</p> <p>(ii) There are some concerns about including the entire ES as one certified document given its size. Evidence of that is the length of the ES Signposting Document [REP2-025] at 108 pages. Should it be broken down in the certification provisions?</p> <p>(iii) Additionally, given its complexity, the ExA would welcome views from the Applicant, ESC and SCC on the inclusion and certification of a guide if a suitable document exists in the examination documentation.</p>
	SCC response at Deadline 7	<p>(iii) SCC would be supportive of a guide being included and certified in principle. However, it is not clear to us which document, if any, in the examination library would perform this function.</p>

Suffolk County Council's responses to ExQ2: 03 August 2021

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ExQ2	Question to:	Question:
FR.2 Flood risk, ground water, surface water		
FR.2.5	Suffolk County Council, Environment Agency, East Suffolk Internal Drainage Board	Main Development Site (MDS) – Water Management Zone (WMZ) Summary Appendix D [REP5-120] provides details of the WMZ infiltration basins for the site. Provide any relevant comments including any areas where the information provided needs further clarification.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraphs 32, 33 & Table 13.
FR.2.7	Suffolk County Council, Environment Agency	Main Development Site – Temporary Marine Outfall (TMO) The Applicant has submitted a technical note (Appendix E) [REP5-120] concerning the Temporary Marine Surface Water Outfall. Provide any relevant comments on the justification for and operation of the TMO.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraphs 34 & Table 14
FR.2.10	Suffolk County Council, Environment Agency, East Suffolk Internal Drainage Board, East Suffolk Council	Ancillary Construction Area (ACA) (or LEEIE) Drainage Strategy Technical Note. Appendix B [REP5-120] sets out the drainage design for the ACA. Provide any comments you have in relation to the strategy set out in this document.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraphs 29, 30 & Table 12.
FR.2.13	Suffolk County Council, Environment Agency	Sizewell Link Road Flood Risk Assessment Addendum Revision 2.0 [REP5-045] Please provide comments of acceptability and coverage following the submission of this revision.

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ExQ2	Question to:	Question:
	SCC response at Deadline 7	SCC accept the results presented in the Flood Risk Assessment Addendum. We have considered the point made by the Environment Agency in their Written Representation [REP2-135, page 36] with regard to a slight increase in surface water flooding to B1122. We do not view this minor increase in flood risk as significant, nor do we request any further work to mitigate this minor increase in surface water flood risk.
FR.2.14	Suffolk County Council, Environment Agency	Sizewell Link Road Preliminary Drainage Design Note Appendix F [REP5-120] provides an initial assessment of the drainage design for the Sizewell Link Road. Provide any comments you have on this note.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraph 35 & Table 15.
FR.2.15	Suffolk County Council, Environment Agency	Two Village Bypass Preliminary Drainage Design Note Appendix G [REP5-120] provides an initial assessment of the drainage design for the Two Village Bypass. Provide any comments you have on this note.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraph 36 & Table 16.
FR.2.16	Suffolk County Council, Environment Agency	Yoxford Roundabout Updated Drainage Strategy Appendix H [REP5-120] provides an updated assessment of the drainage strategy for Yoxford roundabout. Provide any comments you have on this updated strategy.
	SCC response at Deadline 7	Please see SCC response, submitted at Deadline 6 [REP6-049], specifically paragraph 37 & Table 17.
HW.2 Health and wellbeing		
HW.2.0	The Applicant, SCC	<p>Severance Fear and Intimidation</p> <p>In light of the concern expressed at the ISH for Transport regarding the approach taken to the assessment on severance and Fear and Intimidation and the Question raised at TT.2.27.</p> <p>(i) Please advise whether it is regarded that the guidance has been properly used in understanding the implications for severance and the potential for fear and intimidation.</p> <p>(ii) If the ExA concludes that the Guidance has not been properly followed what the implications could be for the assessment and the weight the ExA should apply to the evidence presented to date.</p>

Suffolk County Council's responses to ExQ2: 03 August 2021

Responses due by Deadline 7: 03 September 2021

ExQ2	Question to:	Question:
	SCC response at Deadline 7	<p>i) SCC is content that the guidance, following the updated assessment, has been applied appropriately, subject to final review of that assessment. In relation to the fear and intimidation methodology, the table shown within the IEMA guidelines has been interpreted as the change in traffic / HGV / speed between the without and with development scenarios. If it is not based on the change in magnitude then the majority of links would experience 'extreme' magnitude, if including speed. It is unlikely that SZC is expected to result in a change in average speed over an 18-hour day at the levels set out within the IEMA guidance, therefore speed has been scoped out.</p> <p>The methodology used aligns to that used for other projects. However, the latest analysis needs to be reviewed by SCC following submission by the Applicant.</p> <p>ii) Whilst SCC is content with the methodology used following review by our consultants, if the ExA were to conclude that the Guidance had not been properly followed, perhaps the most proactive course would be for the Applicant to contact IEMA and for them to comment on the assessment method, if they believe that the Applicant has applied the method incorrectly, then the Applicant would need to determine whether any material effect would be likely by altering the assessment method and potentially submit a updated assessment, and propose any relevant mitigation, as a result.</p>
HW.2.1	The Applicant, SCC	<p>Severance</p> <p>(i) In light of the concerns expressed by a number of Parish Councils please advise of the progress of the work that has developed on the schemes at Wickham Market, Little Glemham and Marlesford and elsewhere along the proposed transport corridor.</p> <p>(ii) Are any of the schemes likely to be presented to the Examination setting out the details of proposed mitigation?</p>
	SCC response at Deadline 7	<p>i) Progress has been made on the schemes as follows:</p> <ul style="list-style-type: none"> Wickham Market: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation expected in September / October 2021 Little Glemham and Marlesford: Preliminary scheme details shared with Parish Council, ESC and SCC. Generally acceptable to SCC subject to minor revisions. A12 Yoxford: Preliminary discussions held between Parish Council, SCC and SZC CO on highway mitigation.

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ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> B1122 Corridor (Early Years): Meeting between Theberton and Eastbridge Parish Council, SCC and SZC in September 2021. Preliminary design drawings shared. B1125 Westleton: Discussion commenced between SCC and SZC Co on potential mitigation measures. Leiston Town Centre: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation underway. <p>ii) SCC is working with the Applicant to develop feasible mitigation schemes, but it is incumbent upon the Applicant to submit these to PINS.</p>
HW.2.2	Applicant, ESC, SCC	Dust Monitoring and Particulate Matter (i) In light of the advice from Public Health England in responses to FWQ AQ.1.35 and AQ.1.42 can you confirm that the Dust Management Plans will include sources of dust emissions; the location of sensitive health receptors; monitoring standards and guidelines; and a reporting schedule which allows for timely intervention if elevated concentrations are recorded.
	SCC response at Deadline 7	SCC defers to East Suffolk Council on this matter.
HE.2 Historic environment (terrestrial and marine)		
HE.2.0	ESC, SCC, Historic England	MDS: Requirement 3: Archaeology and Peat Noting discussions at ISH1 on 6 July 2021 and the subsequent submission by the Applicant [REP5-106], are you content with the inclusion of the term 'general accordance' in Requirement 3 [REP5-029]?
	SCC response at Deadline 7	Rev. 5 of the draft DCO included a new paragraph 1(4) in Schedule 2 (requirements), which states – “Where any requirement provides that the authorised development or any part of it is to be carried out in ‘general accordance’ with details, or a scheme, plan or other document that is listed in Schedule 22 and certified under Article 80 of this Order, this means that the undertaker will carry out such work(s) in a way that is substantively consistent with the information set out in those details, schemes, plans or other document and in a manner that does not give rise to any materially new or materially different environmental effects to those assessed in the environmental information”. Following discussions between ESC, SCC and the Applicant, the Applicant proposes to amend paragraph 1(4) (at Deadline 8) to state – “Where any requirement provides that the authorised development or any part of it is to be carried out in ‘general accordance’ with details, or a scheme, plan or other document that is listed in

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ExQ2	Question to:	Question:
		<p>Schedule 22 and certified under Article 80 of this Order, this means that the undertaker will carry out such work(s) in a way that is consistent with the information set out in those details, schemes, plans or other document unless otherwise approved by the discharging authority.</p> <p>Provided these amendments are made to paragraph 1(4), SCC is content with the inclusion of the term 'general accordance' in Requirement 3.</p>
HE.2.2	The Applicant, SCCAS	<p>MDS: Lower Abbey Farm</p> <p>Have site specific mitigation proposals been agreed with SCCAS in respect of Lower Abbey Farm?</p>
	SCC response at Deadline 7	SCC defers to ESC and HE on this issue.
HE.2.3	SCC	<p>MDS: SSSI Crossing</p> <p>Confirmation was provided at ExQ1 HE.1.10 [REP5-120] that the SSSI crossing site will be subject to a site-specific Written Scheme of Investigation. Does this allay the concerns raised at [REP3-084]?</p>
	SCC response at Deadline 7	Following the above response, SCC is satisfied that the Applicant has made suitable provision for archaeological assessment and mitigation at the SSSI crossing site, to be secured through appropriately worded and robust DCO Requirements.
HE.2.6	The Applicant, SCCAS	<p>Peat Strategy</p> <p>Please confirm where differences remain in terms of the proposed Peat Strategy (Appendix 16G of [APP-275]).</p>
	SCC response at Deadline 7	Following the response to this issue made by SCC at Deadline 5 (REP5-172), SCC hopes that the differences between ourselves and the Applicant regarding the Peat Strategy (which may be due to a misinterpretation of our comments rather than a substantive disagreement) have now been addressed so that this no longer remains a point of difference. SCC is satisfied with the latest proposed DCO Requirement wording relating to the Peat Strategy and Peat Written Scheme of Investigation.
HE.2.8	SCC, ESC	<p>Sizewell Link Road: Hill Farmhouse</p> <p>Noting the response made at [REP3-044], do you concur that in respect of the historic interest the construction and operation of the SLR would result in a minor adverse effect which would not be significant?</p>
	SCC response at Deadline 7	SCC defers to ESC and HE on this issue.

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ExQ2	Question to:	Question:
HE.2.9	SCCAS	Sizewell B Relocated Facilities: Pillbox Field Please provide a response to ExQ1 HE.1.18 [REP3-046].
	SCC response at Deadline 7	<p>SCC has no objection to the location of the proposed landscaping scheme, as long as precautions are made to avoid any ground disturbance to the defined archaeological sensitive areas during or after landscaping or planting works.</p> <p>SCC also supports the production of a management plan within a site specific WSI to set out the long term preservation <i>in situ</i> of the defined archaeological area both during and after landscaping works in this field, but also during wider construction, removal and reinstatement works as part of the Sizewell C project as a whole.</p> <p>The site specific WSI will also need to set out an appropriate archaeological mitigation strategy as a safeguard should the Applicant's plans change to involve any ground disturbance within the defined area of archaeology.</p>
HE.2.10	The Applicant, SCC, ESC, Historic England	Enhancement to Proposed Mitigation Schemes Please provide an update on discussions regarding potential enhancement of mitigation schemes for the below assets: (i) Theberton Hall (ii) Abbey Cottage (iii) Farnham Hall (iv) Hill Farmhouse (v) Barrow Cemetery Group (FMF site)
	SCC response at Deadline 7	SCC defers to ESC and HE on this issue.
LI.2 Landscape impact, visual effects and design		
LI.2.1	SCC, ESC, Natural England, The AONB Partnership, National Trust, Stop Sizewell C, TASC	Additional Construction Visualisations Additional illustrative day and night-time construction photomontage visualisations are to be produced from four Representative Viewpoints [REP5-117]. Please comment on the suitability of the selected locations.
	SCC response at Deadline 7	SCC is content that the proposed additional visualisation locations set out at para 1.5.3 of Rep 5-117 are acceptable

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ExQ2	Question to:	Question:
LI.2.3	The Applicant, SCC, ESC	Design Review Panel Please provide an update regarding discussions on the proposed role of a design review panel.
	SCC response at Deadline 7	SCC Defers to ESC on this matter
LI.2.4	ESC, SCC	Design Review Panel Paragraph 1.4.18 of [REP5-110] confirms that the design review panel would be used to provide independent support for the processing of design submissions defined by the requirements. Are you content with the proposed timing of the role?
	SCC response at Deadline 7	SCC Defers to ESC on this matter
LI.2.7	ESC, SCC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	SSSI Crossing – Design Amendment Please review the amended SSSI crossing design [REP5-010] and provide comment.
	SCC response at Deadline 7	In respect of the design issues of the SSSI Crossing, please see the comment on Principle 79 in answer to LI2.22 below. The issue of the principle of the causeway is addressed elsewhere in SCC's submission to D7 (see Written Submission on ISH10)
LI.2.22	ESC, SCC, Natural England, The AONB Partnership, National Trust	Design and Access Statement –Overarching Design Principles and Detailed Built Development Principles Several amendments and additions have been made to Tables 5.1 and 5.3 of the DAS [REP5-070]. Please review and comment on the amendments and additions.
	SCC response at Deadline 7	Principle 56 The changes to this principle dealing with the main turbine halls whereby there is to be agreement with ESC on the colour palette is to be welcomed. It is considered that there could be greater clarity given here by reference to the 'Guidance on the Selection and use of Colour in Development' published by the Suffolk Coast and Heaths AONB', as there is in the revised Principle 79 for the SSSI Crossing and as countenanced in Para 6.17.6 of the DAS. Principle 57 with regard to Interim Spent Fuel Store. Similar comments to those above on reference to the AONB Colour document could be included here. However, SCC considers that there could have been greater clarity given to the Examination on the scale, form and materials to be used for this building as a straightforward building which could have been designed specifically for this location

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ExQ2	Question to:	Question:
		<p>rather than being a duplicate of a building at Hinkley Point C which may not be appropriate for this more sensitive setting.</p> <p>Principle 79 with regard to the SSSI crossing. The clarification of the use of colour is welcomed. However, consideration needs to be given as to whether there is adequate expression of controls to ensure that the nature of the SSSI crossing, in particular the size and nature of the culvert/one span crossing being discussed at ISH10 is achieved</p>
LI.2.23	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p>Design and Access Statement –Overarching Design Principles</p> <p>In respect of Overarching Design Principles 17-21 [REP5-070], are you satisfied that the proposed design of the MDS meets the objectives of these principles?</p>
	SCC response at Deadline 7	<p>SCC has expressed disappointment in the past that the design of the Sizewell C power station has not been able to more adequately reflect the strong design principles evidenced by Sizewell B, in particular the way in which the colouration of the dome is able to be a recessive form while at the same time allowing the whole to become an iconic structure. However, within the constraints created by self-imposed intention to replicate the design used at Hinkley Point C, the Applicant has sought to achieve the best outcome reflecting Principles 17-21. The exception to this is the use of pylons and overhead cables for power transmission within the site which will detract from the achievements in the MDS. This has been addressed more fully elsewhere.</p>
LI.2.24	ESC, SCC, Natural England, The AONB Partnership, Theberton and Eastbridge Parish Council, Stop Sizewell C, TASC	<p>Design and Access Statement – Accommodation Campus Design Principles</p> <p>Please review and comment on the revised design principles contained within Table A.1 [REP5-075].</p>
	SCC response at Deadline 7	<p>SCC Defers to ESC on this matter</p>
LI.2.30	The Applicant, SCC, ESC	<p>Associated Development Sites – Requirement 22A</p> <p>SCC [REP5-176] considers they should be the discharging authority for Requirement 22A as the proposed landscaping is on highway land. Are discussions regarding this matter underway?</p>
	SCC response at Deadline 7	<p>Preliminary discussions have been held between ESC, SCC and SZC Co regarding discharge of landscaping on land that is or will become highway maintainable at public expense.</p>

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ExQ2	Question to:	Question:
		At the time this response was completed, SCC was waiting for the Applicant to provide updated plans to help it better understand the requirement.
NV.2 Noise and Vibration		
NV.2.2	Applicant, SCC, ESC	<p>Quiet Road Surfacing</p> <p>(i) What additional acoustic benefit might be expected if this surface were to be used for the Sizewell Link Road and the Two Village Bypass?</p> <p>(ii) Would a different maintenance regime from a standard road be required in the event this surface were to be adopted to maintain the acoustic benefits it may bring?</p> <p>(iii) Is this now being factored into the discussions?</p> <p>(iv) In the event that quiet road surfacing were to be offered how would this be secured?</p>
	SCC response at Deadline 7	<p>(i) 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.</p> <p>The authority considers that level 3 is appropriate for existing roads (A12, B1122) but level 2 may be suitable for new roads <u>where additional mitigation is possible</u>, for example where bunds or cuttings reduce the overall traffic noise.</p> <p>https://standardsforhighways.co.uk/ha/standards/mchw/vol1/pdfs/3796149%20MCHW%20Vol%201%20Series%20900_Print%20v0.2.pdf</p> <p>(ii) Lower noise surfacing are generally more porous and hence 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>(iii) and (iv)</p> <p><u>Existing Roads</u></p> <p>Low noise surfacing forms part of the proposed mitigation scheme for the A12 at Marlesford and Little Glemham and this will be secured as a specific item named within a defined scheme in the Deed of Obligation. Early discussions with the Applicant indicate that this will be acceptable for other schemes where quieter surfacing is proposed (Yoxford and Theberton).</p> <p><u>New Roads</u></p>

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ExQ2	Question to:	Question:
		The provision of quieter surfacing will need to be included in the detailed design that will be technically approved by SCC. SCC proposes this can be done through additional plans for approval if that is acceptable to other parties.
SA.2 Section 106		
SA.2.0	The Applicant, ESC, SCC, Natural England, MMO, Trinity House	Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation
	SCC response at Deadline 7	SCC has responded to the commentary in a separate submission submitted simultaneously at D7.
SE.2 Socio-economic		
SE.2.0	The Applicant, SCC, ESC, Network Rail	<p>Rail Services</p> <p>In trying to understand the socio-economic and community effects which may result from the development. Can you assist the ExA in understanding the status of the Rail Prospectus referred to within the LIR [REP1-045]. This appears to indicate that in order to support economic growth in the region upgrading of the rail line to improve both passenger and freight capacity during the construction period for the development is sought.</p> <p>(i) What status in planning terms does this document have?</p> <p>(ii) Would operating the night time rail freight service as proposed prevent the delivery of rail improvements during this period?</p> <p>(iii) Had the Council's or Network rail developed a mechanism to fund the rail improvements envisaged within the prospectus, by for example requiring developer contributions through the Community Infrastructure Levy or other mechanism?</p> <p>(iv) Did the socio economic assessment consider the implications of effects of the DCO scheme on the potential delivery of rail improvements during the proposed construction programme?</p>
	SCC response at Deadline 7	<p>i) The Rail Prospectus supports the Local Transport Plan, which is a statutory document that sets out our transport investment priorities and transport policy framework. The Prospectus itself does not have a planning status, but is considered a guidance document.</p> <p>ii) SCC is not aware of any specific impact that the delivery would have; however, it is likely that running of night time trains would reduce the ability to deliver any future improvement works on the East Suffolk Line through night time closures. SCC has requested that the</p>

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ExQ2	Question to:	Question:
		<p>Applicant tests a scenario where the last night-time freight train is delayed and cannot leave Sizewell.</p> <p>iii) SCC is not aware of any mechanism for funding the works that has been developed.</p> <p>iv) The Applicant is best placed to respond to this query.</p>
TT.2 Traffic and Transport		
TT.2.1	Suffolk County Council	<p>Streetworks Permit Scheme</p> <p>The Applicant provided a response [REP3-046] stating that "The permit schemes implemented by SCC are authorised pursuant to Part 3 of the Traffic Management Act 2004 (the "TMA 2004"). The TMA 2004 is not disapplied by the draft DCO [REP2-015] and therefore the Applicant is of the view that the permit schemes would still apply to the highway works comprised in the authorised development. However, should SCC be of the view that specific drafting is required to provide for the application of the relevant permit schemes to the works authorised by the DCO then the Applicant would be willing to consider including such drafting in a future revision of the draft DCO."</p> <p>Do you still consider revised drafting is required and are you progressing this with the Applicant?</p>
	SCC response at Deadline 7	<p>Subject to an agreement for recovery of SCC's reasonable costs and an appropriate procedure for raising permits (unless the applicant can do so as a statutory undertaker) no additional drafting is required.</p>
TT.2.2	Suffolk County Council	<p>Suffolk County Council - A12 improvements: A14 'Seven Hills' to A1152 Woods Lane</p> <p>Please clarify the position with respect to the following:</p> <p>(i) Status of the A12 major route network project;</p> <p>(ii) Whether the modelling work for this project included the modelling of Sizewell C impacts /mitigations;</p> <p>(iii) Does this modelling identify improvements in network performance for all traffic including Sizewell C traffic;</p> <p>(iv) Review paper in Appendix A [REP5-115] and provide any comments; and</p> <p>(v) Are you seeking a local contribution to this scheme proportionate to the impact of Sizewell C traffic on network traffic levels and performance?</p>
	SCC response at Deadline 7	<p>(i) The A12 MRN project is currently developing towards submission of an Outline Business Case to the Department for Transport in Autumn 2021.</p>

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ExQ2	Question to:	Question:
		<p>(ii) SCC has included both SZC traffic demand and SZC network interventions into the Suffolk County Transport Model as part of our A12 MRN appraisal.</p> <p>(iii) Yes, the modelling identifies improvements for all traffic, including Sizewell C traffic. For the combined scheme Outline Business Case we now have SZC & SPR included in our Core Scenario. DfT have accepted our approach to include this in the Core Scenario for the business case submission. The scheme is currently returning sufficient journey time user benefit to make the scheme value for money. Although this is work in progress, we are currently demonstrating the scheme has benefit to all traffic including SZC beyond even the consented mitigation agreed as part of the Brightwell Lakes development.</p> <p>(iv) SCC responded to [REP5-1115] at Appendix A of our Deadline 6 submission [REP6-049].</p> <p>(v) SCC will be expected to provide a local contribution to the scheme as part of our bid to DfT; we are seeking that the Applicant provide a contribution proportionate to their impact compared to background growth which would form part of our local contribution. The exact method for determining this is a matter of discussion, including which element of network performance is used; however, the Council are looking to take a reasonable approach, focussed around impacts on increased delay and it appears we are close to agreement with the Applicant on an appropriate level of contribution. Should the bid be unsuccessful, SCC would use the contribution to fund either sustainable transport improvements or smaller more localised interventions along the corridor to mitigate the proportional impact of Sizewell C; however further work would be needed looking at individual interventions to ensure that they offer value for money and work in collaboration with the Brightwell Lakes improvements.</p>
TT.2.6	Suffolk County Council, Suffolk Constabulary	<p>Abnormal Indivisible Loads (AIL) Management [REP5-114]</p> <p>Provide comment on whether the position with respect to AIL set out by the applicant is acceptable on the following routes:</p> <p>(vi) A14;</p> <p>(vii) A12, Lowestoft to Leiston;</p> <p>(viii) A12, Woodbridge to Leiston; and</p> <p>(ix) B1122.</p>

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	<p>SCC response at Deadline 7</p>	<p>The AIL Management Strategy</p> <p>SCC understands that Suffolk Constabulary and the Applicant have been working towards an agreed matrix (the pre-mitigation Matrix) which will guide the requirements for the policing of AIL movements to and from the working areas associated with the Project (i.e. including the main worksite; the off-site associated developments; and the off-site road projects of the Sizewell Link Road (SLR), the Two Villages Bypass (TVBP) and the Yoxford Road roundabout). It is understood that the pre-mitigation Matrix will be included within an updated CTMP. A post-mitigation Matrix could be included in the CTMP, subject to agreement between the parties. The Applicant also proposes to prepare an additional post-mitigation Matrix which will reflect on the effects of the SLR, TVBP and Yoxford Road roundabout on AIL access and egress. It is understood that the Applicant will put forward that the post-mitigation Matrix will reduce the anticipated draw on the Constabulary's resource by reducing the need for police escorting. The Council understands that the post-mitigation Matrix has yet to be provided to the Constabulary by the Applicant for review.</p> <p>Subject to the pre-mitigation Matrix being formally presented in the CTMP in line with the detail that is being agreed between the parties, it is understood that the Constabulary will be satisfied that the Applicant has the correct guidance in place to provide to its contractors and hauliers to inform the movement of AILs to and from the Project. The duty is then on those moving the AILs to comply with that guidance or to demonstrate why it is appropriate to deviate from it. SCC is content with this process.</p> <p>The pre-mitigation Matrix and post-mitigation Matrix will be used by the Applicant to predict the volume and anticipated profile of AIL movements associated with the Project – based on data from the Hinkley Point C (HPC) project. In turn that prediction will allow the Constabulary to model the resource requirement to manage the Constabulary's involvement. It is then expected that the Applicant will fund that resource for the term of the construction period, subject to agreed reviews to reflect changes in predictions and programme. The frequency of reviews has not yet been set.</p> <p>Subject to the funding, it is understood that the Constabulary will be able to support the AIL movement strategy to the level of resource provided by the Applicant.</p> <p>It is noted that the Applicant is agreeing in principle to fund resources for a bespoke AIL unit [Paragraph 1.4.5 of document reference REP5-114]. It is understood that this will enable the Constabulary to provide the assistance required to escort loads up to the quanta and distance over which the escorts are required to reflect that which will be predicted by the Applicant and then agreed with the Constabulary as the quantum to match the resources funded. That will set the level of assistance that can be dedicated to the Project and will be the Applicant's risk to set the resourcing correctly.</p> <p>What must not be neglected is the demand for AIL movements to and from the associated development sites during their construction and removal – which includes the construction of the SLR and TVBP. These will also have a draw on police resources and if that demand is not included within the resource allocation to be funded by the Applicant then the management of those movements will be carried out</p>
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		<p>using the existing resources within the Constabulary. The excess AIL movement demands beyond those identified by the Applicant's predictions and funding will be subject to the same procedures and programming as other hauliers experience when wishing to engage Constabulary resources to move an AIL. This operation is at the Undertaker's own risk.</p> <p>The Constabulary has indicated to the Applicant that the AIL Unit will be able to apply any spare resource time to other roads policing tasks, which will be rostered to reflect the demands on officer time once AIL management is accounted for. It is understood that there can be no commitment to what that time and input will be and the Applicant should not rely on that input to mitigate effects of the Project.</p> <p>The pre-mitigation Matrix is predicated on assumptions, which have been agreed between the Constabulary and the Applicant, which SCC supports. Those assumptions will inform the size of the dedicated AIL Team for the project. If the assumptions are changed, or deviate from that agreed, this needs to be communicated by the Applicant as this may impact of the size of the AIL Team required.</p> <p>Two elements which are informing the definition of the AIL strategy, and the resources required, are the use of the Orwell Lorry Park as a location for the assigned Police escorting team to meet AILs; and the prospect of locations mid-route along A12 north and south of Yoxford to supplement the strategy and potentially reduce the necessary escorting distance by allowing AILs to travel part way along A12 before joining the police team for the load and vehicle to be inspected and escorted.</p> <p>Firstly, it is noted that the Orwell Lorry Park has been identified for redevelopment which will require the Applicant to identify an alternative location to meet the Police escorts and have the commencement inspections carried out safely – where a mid-route A12 meeting place is not available or appropriate.</p> <p>Furthermore, if an acceptable configuration and location cannot be achieved for the mid-route meeting point on A12 south then the resource requirement will be based on the need to meet all escorted AILs at the Orwell Lorry Park, if it is available of a similarly agreed point close to the Suffolk County boundary. Any changes to the strategy will need to be reflected in the conclusions draw on the resources and associated funding required.</p> <p>It is understood that the Constabulary has expressed to the Applicant that even with the funding of a dedicated AIL Unit, the current practices regarding the notifications of AIL movements is paramount. It is considered that through the appropriate scheduling and notification of the AILs, and good liaison between the Applicant, the TRG and the Constabulary, that the smoothest movement of AILs can be achieved.</p> <p>The Council supports the Constabulary in its position that it requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p>
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		<p>Supplementary Observations on REP5-114</p> <p><u>B1122 journey times:</u></p> <p>The Constabulary considers that the estimates of travel timings along B1122 between Yoxford and the main site [at paragraphs 1.4.6-1.4.9 of [REP5-114] are appropriate under current conditions and with no other external effects e.g. third party incidents. These times could extend if AILs (and associated escorts) come into conflict with similarly large vehicles in the opposing direction, which can quickly add travel time and disruption whilst the escorts manage the opposing flows at the most convenient passing point. The Constabulary's experience, when escorting larger AILs (e.g. over 3.5m wide), is that the average speed is much lower than 30mph.</p> <p>It is noted that the travel predictions relate only to B1122 and do not reflect on the movement of AILs on the A12 corridor.</p> <p><u>Classification of AILs:</u></p> <p>Paragraphs 1.5.1, 1.6.38 and Appendix A Figure 1 of REP5-114 sets out the vehicle type that are to be monitored during the construction of the Project. The classifications do not include HGVs over 44t and therefore excludes a number of AILs. The Applicant has to date recorded all vehicles arriving and departing the HPC works site. The Constabulary would expect all AILs movements to be recorded in the observations of HGVs access the main works. Within reason, the Constabulary does not comment on the appropriateness of the caps on HGV movements and whether this should include or exclude AIL movements [paragraph 1.6.45 REP5-114 refers]. This would be a matter for SCC and ESC as Local Highway Authority and Local Planning Authority, respectively, until the movements of HGVs and other vehicles associated with the Project became such that the volumes of traffic hindered the safe and efficient operation of the road network and the management of AILs. The Constabulary is, however, keen to have the data on the number and format of AIL movements recorded and monitored to allow for the on-going management of the AIL systems and resourcing, and would therefore propose that vehicles in excess of 44t are also recorded, reported and monitored. This will be important to assist with monitoring and auditing.</p> <p>In view of the pivotal role the Constabulary holds when maintaining the safety of road users in Suffolk, and the need to monitor and react accordingly to potential impacts of the Project, the appropriate mechanism for reporting and monitoring the management of AIL numbers and reviewing the effects of the operations is through the TRG. The Constabulary notes that the Applicant has proposed that the Constabulary is invited to attend the TRG, however, the Constabulary must be a full member of the TRG with voting rights in order properly to represent its interests during the construction period as a key stakeholder in the management of Roads Policing. This view is one that has been repeated by the Constabulary to the Applicant, and is supported by those key strategic partners that wish to see the smooth operating of Suffolk's roads during the Project.</p> <p><u>Constitution of the Transport Review Group</u></p>
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		<p>Paragraphs 1.6.12 and 1.6.13 of REP5-114 refer to the constitution of the TRG and its associated power and mandate on the management and control of the construction period traffic. The proposed constitution of the TRG would be for a 50/50 split between the Undertaker and local authority stakeholders. Those local authority stakeholders include Highways England (to be rebranded National Highways at the time of writing). Highways England's role in relation to the construction of the Project is related to the effects on the Trunk Road network. Its jurisdiction in Suffolk therefore ends at the junction of A14 with A12 (the Seven Hills interchange). It can be reasonably anticipated that Highways England would be minded not to use their vote on matters that do not directly affect the Trunk Road network, thus giving the casting vote on contentious matters to the Undertaker. It would therefore seem appropriate to restore that balance by providing the Constabulary full voting rights on the TRG, not least as they are a key stakeholder in the management of the road network across Suffolk, but also that decisions made at the TRG will have a direct effect on the Constabulary's operations.</p> <p><u>Off-site Mitigation Clarification</u></p> <p>The Constabulary has requested clarification relating to the design and layout of the SLR and the TVBP, regarding the configuration of the associated roundabout junctions and the need, or otherwise, for central double white lining along the corridors. These design clarifications will affect the scale of resourcing that will be required to support the construction period which the Applicant will require. The Applicant proposes that a revised AIL matrix will be sought to reflect its off-site mitigation (i.e. the SLR, TVBP and the adjusted Yoxford Road roundabout). That matrix will be considered by the Constabulary once received and reflecting the design clarifications which have been sought.</p> <p>At paragraph 1.7.1 of REP5-114, the Applicant asserts that the Yoxford roundabout is sized to <i>"accommodate the largest expected AIL movement for both Sizewell B and C"</i>. The Constabulary previously has sought from the Applicant clarification on when it anticipates it will need to utilise the dedicated through route which crosses the centre of the roundabout. The Applicant has provided swept-path information on scenarios of AIL configuration which can negotiate the junction between A12 north and Yoxford Road, but it has not confirmed when the central route will be required and how that use will be managed. Subject to the temporary traffic management mechanisms that the Applicant proposes to put in place on those occasions, the use of the central route could require the Constabulary in attendance to direct general traffic.</p> <p>Further to the consideration of the movement of AILs associated with Sizewell B and C, the Constabulary requires clarification on the configuration of vehicles that can move through the junction between A12 north and A12 south (and vice versa) without Constabulary assistance. The A12 corridor will continue to be used for AIL movements for vehicles not associated with the Project or Sizewell B. SZC Co. needs to show that the introduction of a roundabout in this important corridor will not affect the ability of other AILs to move along the A12 without the assistance of the Constabulary, where previously assistance was not required.</p>
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ExQ2	Question to:	Question:
TT.2.7	Suffolk County Council	<p>Peak Hour HGV Caps</p> <p>In paragraph 1.6.16 [REP5-114] the peak hour HGV movement caps are set out. Provide any comment on the peak hours chosen and the levels set.</p>
	SCC response at Deadline 7	<p>Firstly, it should be said that SCC has always welcomed the peak hour caps to which the Applicant has committed, as set out in REP5-114 and the CTMP at REP2-054. These figures broadly reflect those that have been assessed travelling from the wider network to the main development site. However, SCC has also always been concerned that the adjacent hours (specifically 07:00 to 08:00 and 16:00 to 17:00) can also be the network peak hours, particularly in more localised areas. It is also of note that the 07:00 to 08:00 hour is the Reference Hour that is assessed within the ES.</p> <p>Since our submission of Table 2 at REP3-079, which set out that SCC were looking for controls on the adjacent peak hours, SCC have looked to find resolution on all our concerns around monitoring and controls, including our concern regarding caps on peak hours and what should be capped, controlled or monitored. At Deadline 5 [REP5-172] in response to 15.5.3, SCC maintained its position that controls should be included for the adjacent hours; however SCC is not proposing to cap those hours, but are looking for the adjacent hours to include targets within the CTMP based on those figures assessed within the ES, with a process in place that should those targets be regularly exceeded then a review should be undertaken and management measures implemented to address the exceedance. This matter is under discussion with the Applicant, and recent progress has been made which SCC understands is agreed and will inform a revised CTMP.</p> <p>It is worth noting that the Applicant has not committed to any peak hour caps associated with HGVs for the AD sites, and in order to be pragmatic SCC has accepted this control is outweighed by the need to deliver the Associated Development Sites as expeditiously as possible. However, the Applicant must monitor both main site and associated development HGV movements and report these to the TRG. SCC considers it reasonable for the Applicant to engage with this group if HGV movements come close to the numbers assessed in the TA and ES and manage demand so that the movements assessed in the TA and ES are not exceeded.</p> <p>SCC understands that the peak hour caps proposed for the main site apply to the B1122 in an identical way that the daily caps do (i.e. HDVs including Associated Site trips), and will seek confirmation of this in the updated CTMP, which is understood will be submitted at Deadline 7.</p>

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ExQ2	Question to:	Question:
TT.2.10	The Applicant	<p>Sizewell Link Road - Vehicle Distance Travelled Comparison</p> <p>In paragraph 1.9.18 [REP5-114] Table 6 on electronic page 498 of [REP2-108] is referred to. Please explain why in the Assessment Table in Appendix A of that document why Alignment W results in 11% more mileage than Alignment Z, which is said to give the least route mileage of all options, given Table 5 [REP5-114] of the latest submission clearly shows the contrary?</p>
	SCC Response at Deadline 7	<p>The AECOM Report in Appendix 12 of REP2-108 was carried out at the request of the Applicant as an independent peer review of defined information with a high-level qualitative appraisal and scoring. It is understood from discussions with AECOM that it was not intended to form the primary basis for route selection, but rather as an internal document for EDFE to help inform their decision making and further work. It was undertaken in April 2019 before any comparative route option modelling was undertaken.</p> <p>The report was undertaken without any knowledge of the validity of the traffic modelling undertaken by that time, and the modelling has since evolved considerably through the stakeholder review process.</p> <p>Given that there was no validated modelling available for the respective route options at that stage, the route mileage assessment was based solely on route distance from a particular point on the A12. This highlights the high-level nature of the report.</p> <p>The assessment in Appendix 12 of REP2-108 does not account for vehicle mileage, which is a more accurate measure of the relative sustainability, and can only be determined through modelling which was completed at a later stage after requests by Suffolk County Council and the EXA. The later data presented in Table 5 [REP5-114] was prepared two years after the document in Appendix 12 of REP2-108 and is more representative of the relative vehicle kilometres offered by the routes. This confirms that Route W offers a more sustainable alternative in terms of vehicle kilometres.</p>
TT.2.16	The Applicant, Suffolk County Council	<p>B1125 / B1122 – Junction Priorities</p> <p>Create Consulting [REP5-258] on behalf of the Bacon Family express concern that the new arrangement with the link from the B1125 to the SLR alters the priorities where it meets the B1122. They suggest that the priority arrangements with the B1122 would make the B1125 a direct link and thus they consider it would serve to encourage the use of the B1125. It is understood discussions are ongoing with respect to the impact on the B1125. Could the issue of the junction priority for both legs of the B1122 from the new B1125 link be examined in this context?</p>
	SCC response at Deadline 7	<p>No changes to the layout of the B1125/B1122 SLR junction have been submitted to SCC although it was raised verbally at a meeting between the parties.</p>

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		Removing this junction so that traffic from the B1125 joins the existing alignment of the B1125 would not in SCC's opinion significantly reduce the attraction of through traffic on the B1125. It would mean than such traffic accessing the main site or Leiston would travel through Theberton and not use the SLR. Such impacts have not been assessed in the Peak Year scenario to make detail comments although it would appear that residents in Theberton would be subject to both a significant proportion of current noise from the B1122 and from the new SLR from the south.
TT.2.17	The Applicant, Suffolk County Council	<p>Yoxford Roundabout - Size of Roundabout</p> <p>The Heveningham Hall Estate (HHE)'s representation [REP5-278] maintains their view that a smaller diameter roundabout would serve the predicted traffic flows. Previous responses on this issue have focused on whether the proposed roundabout is acceptable. The point being made relates to whether a smaller roundabout with less land take could be operationally acceptable. Respond to this specific suggestion.</p>
	SCC response at Deadline 7	<p>There are two parts to this question, the first relates to the junction operating in terms of traffic capacity, whilst the second relates to design, including the need to cater for abnormal loads. Both elements can affect the scale and design of the junction. However, in the case of the Yoxford roundabout, the second element will have more greatly affected the roundabout's design.</p> <p>Regarding capacity, the results for the junction are set out at [REP4-005]; the junction has been modelled both within the Yoxford VISSIM model and using Junctions 9.</p> <p>SCC has consistently sought robust assessments of junction performance to be undertaken; this has been previously noted in our response to Seasonal Traffic Effects at [REP5-173] with regards to the inclusion of outage workers and it is also worth noting the Applicant's response at paragraphs 1.11.7 to 1.11.11 of [REP5-115] with regards to the expected potential reduction in growth forecasts, which would likely result in slightly reduced traffic flow in any future year assessment. The assessment also includes reductions to capacity on approaches to reflect unequal lane usage. SCC believes the methodology used for modelling the junctions is reasonable and robust.</p> <p>The outputs of the Junctions 9 modelling indicate that the junction will function with some spare capacity, whilst the VISSIM model indicates some queuing on the A12, but not that which would be considered to be significant. These results are considered acceptable despite the increase in delay for A12 southbound traffic in particular. There is of course elements of professional judgement in determining what junction operation would have been considered acceptable based on traffic capacity; and it may have been that a junction operating over capacity for very short periods of time would be considered acceptable depending on the frequency and year this was predicted to occur, as well as whether blocking back to other junctions or a level crossing would have resulted. It is likely on this basis</p>

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		<p>that a junction functioning worse than modelled may have been considered acceptable. This would indicate that in terms of traffic capacity there would be some potential to reduce the scale of the junction; however, in order to determine the exact scale this would need to be an iterative process that would need to be undertaken by the Applicant.</p> <p>The second element of the design is to accommodate Sizewell C traffic including the scale of vehicles that required for construction of SZC , which includes abnormal loads; SCC considers that the roundabout has been designed to safely cater for these movements whilst also providing an acceptable roundabout layout during normal operation, however, the Applicant is likely to respond in more detail on this issue.</p> <p>The necessity to deliver the roundabout offline is also likely to affect the roundabout's geometries, most notably the deflection which subsequently affects the required diameter.</p> <p>SCC as the Local Highway Authority have assessed what has been proposed by the Applicant to ensure that it is feasible in planning terms. The Applicant has confirmed that there are no departures from standards in the design. The highway designs submitted within the application are subject to technical approval by SCC. The draft DCO [REP6-006] Schedule 2, Requirement 22 requires that highway works are carried out in accordance with the approved drawings, limits of deviation, and save to the extent that alternative plans or details are submitted to and approved by SCC.</p>
TT.2.18	The Applicant, Suffolk County Council	<p>Highway / Traffic Management / Public Realm Schemes – Implementation</p> <p>Set out the expected implementation dates of the highway / traffic management / public realm schemes identified in the Deed of Obligation or the DCO that are not already shown in the Implementation Plan</p>
	SCC response at Deadline 7	<p>SCC has stated its position at Table 11 of our Deadline 6 response [REP6-049] that the majority of these schemes should be delivered by the Applicant. This has been agreed by both SZC Co and SCC. It is therefore incumbent upon the applicant to provide suitable timescales that deliver these works in advance of the impacts and minimise traffic disruption.</p>
TT.2.28	The Applicant, Suffolk County Council	<p>Environmental Statement (ES) – Assessment of Impacts</p> <p>Paragraph 1.10.8 [REP5-115] sets out that there are ongoing discussions with respect to the assessment of transport impacts set out in the ES. Set out the areas of disagreement and also what progress has been made in resolution.</p>
	SCC response at Deadline 7	<p>As set out in our Response at Deadline 6 [REP6-049] to 1.6.31, the Environmental Statement workstream is not quite complete. SCC is awaiting the updated assessment which will need to be reviewed; however, significant progress has been made. We are committed to all necessary engagement to complete this workstream. For ease of reference, SCC will set out any areas of</p>

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		disagreement once we have a final submission of the Environmental workstream; however, we do not currently expect any areas of disagreement.