The Sizewell C Project, Ref. EN010012

Comments on any additional information/submissions received at D7

Suffolk County Council Registration ID Number: 20026012

Deadline 8 **24 September 2021**

Table of contents

SCC Response to [REP7-060] Comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish16 – Appendices 3

[REP7-061] Comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish16 15

[REP7-018] Appendix 2A of the Environmental statement: drainage strategy – tracked changes version 20

SCC response to [REP7-061] Comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish6 22

SCC response to [REP7-062] comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish6 appendix h: summary of changes to be made to the transport management plans 28

SCC response to [REP7-061] section 2.8.3 of comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish6 31

SCC response to [REP7-061] section 2.8.13 of comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish6 34

SCC response to [REP7-061] section 2.21.11 of comments at deadline 7 on submissions from earlier deadlines and subsequent written submissions to ish1-ish6 48

SCC response to [REP7-071] SZC Co. Written submissions responding to actions arising from ish8 51

SCC response to [REP7-050] SZC Co. Response to exq2 Volume 1 part 1 54

SCC response to [REP7-052] SZC Co. Response to exq2 Volume 1 part 3 63

SCC response to [REP7-053] SZC Co. Response to exq2 Volume 1 part 4 73
SCC response to [REP7-055] SZC Co. Response to exq2 Volume 1 part 6 87
SCC response to [REP7-036] Planning Statement Appendix 8.4k – Site Water Supply Strategy 113
SCC response to [REP7-030] and [REP7-032] Fourth Environmental Statement Addendum and Appendices 115

SCC RESPONSE TO [REP7-060] COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH16 – APPENDICES

Appendix F: Southern Park and Ride Drainage Design Note [REP7-060]

Ref	SZC Co statement	SCC Deadline 8 response
2.1.3	This concept drainage strategy was developed in consultation with drainage regulators and local authorities, including SCC and the Environment Agency (EA). The observations/requirements of drainage regulators were incorporated in the strategy.	SCC have not been consulted in the development of this drainage strategy. The only information previously seen by SCC in relation to the Southern Park and Rides drainage strategy, is that contained in the Outline Drainage Strategy [APP-181], responded to in East Suffolk Council & Suffolk County Councils Local Impact Report [REP1-045, para 20.91].
5.1.2	The new data which informs the design development is listed below: • Ground Investigation and infiltration testing undertaken in November 2019	The detailed results of infiltration testing have not been seen by Suffolk County Council. This information should be submitted to the examination in support of the proposed drainage strategy.
6.1.2	Infiltration testing in accordance with BRE365 (Ref. 1) was undertaken and the results are shown in Table 1	It is not possible to confirm the accuracy of this statement without seeing the results of infiltration testing.
Table 1	Southern park and ride site infiltration test trial hole results	Only two test runs are listed for each trial pit. This would not be in accordance with BRE365 methodology which requires three test runs per trial pit.
6.1.9	At the time of visit on 3 August 2021 further ground investigation works were in progress and include additional infiltration testing. The results of the further infiltration testing	Given the importance of this information is there no way it can be obtained sooner?

	will be taken into account at preliminary design stage. It is hoped that these results will demonstrate that infiltration is viable in other parts of the site but if this is not the case, it is considered that the current concept proposals will provide for suitable and effective drainage of the site.	Expanded on further in response to 7.1.14.
7.1.4	Runoff from the internal roads, the bus/HGV standing areas and the Traffic Incident Management Area, which must have an impermeable surface will be drained via surface outlets, gullies, linear channels and drains etc. These will discharge into underground carrier drains which will convey the runoff to the same attenuation basins and swales or in the north to infiltration basins.	Why 'must' these areas have impermeable surfaces?
7.1.5	Bypass interceptors will be installed downstream of the bus/HGV standing areas in order to remove hydrocarbon and silt contaminants which will improve the water quality of discharge to the attenuation basins, swales and infiltration basins	No pollution assessment has been undertaken. There is a general reliance on proprietary treatment measures as a primary method of surface water treatment.
7.1.7	In the centre and south parts of the site, the underground carrier drains will discharge all surface water into a series of swales and attenuation basins which will provide suitable treatment in accordance with CIRIA C753 The SuDS Manual (Ref. 2). The swale/attenuation basin network will discharge into a pumping station which will pump runoff to the infiltration basins to the north.	No mention of tanked system that provides the majority of the sites attenuation storage
7.1.14	The storage requirements for the infiltration basin to the north allow for the pumped flow at 50 l/s.	Suffolk County Council as Lead Local Flood Authority only allow pumped systems as a last resort. A lack of

		infiltration testing across the site is entirely within the applicants control and is not adequate justification to propose a pumped system. If further infiltration testing found no infiltration in the south of the site, SCC accept that pumping would be required. However, as per local LLFA guidance (page 18), where pumped systems are used, they must be designed to account for a 24 hour pump failure. This assessment has not been undertaken. However, if infiltration was proven in the south of the site, SCC would expect infiltration at source to be prioritised and all pumping arrangements to be removed. It has not been demonstrated that there is sufficient space allocated for attenuation in this scenario. SCC appreciate that an infiltration rate is required to determine an attenuation requirement. Therefore, SCC request that the Applicant demonstrates there is sufficient space for above ground attenuation (in compliance with national and local policy, best practice, and guidance) with a design infiltration rate of 10mm/hr, in the absence of the results of further infiltration testing. An assessment of the consequence of failure would also need to be undertaken and agreed with SCC to determine a suitable Factor of Safety to apply to the southern basin. This is the same approach that was recently applied to ScottishPower Renewables East

		Anglia One North and East Anglia Two DCO's in the absence of more accurate information and is entirely in line with the Rochdale Envelope approach. The above approach is required to demonstrate that there is sufficient space within the Order Limits to deliver the required mitigation, as identified in the Environmental Statement.
Table 2	Southern park and ride site drainage attenuation and infiltration infrastructure requirements at concept design stage	Total storage requirement = 13,435m^3 9,888m^3 of this requirement (73.6%) is met using below ground (tanked) storage. This approach does not comply with the following documents due to the lack of pollution treatment, biodiversity and amenity benefits associated with such an approach: • Local Plan Policy SCLP 9.6, particular attention drawn to paragraph 9.59 • Local Guidance - Suffolk County Council Flood Risk Management Strategy, Appendix A • National Guidance - CIRIA SuDS Manual The infiltration rate is stated as an average of the values obtained through testing. As per BRE 365 methodology (paragraph 3.2.3), the lowest of the three test results should be used for design. Therefore, this methodology and all subsequent information based on this result (including appended calculations) are not accepted by SCC.

		SCC made it clear in East Suffolk Council & Suffolk County Councils Local Impact Report that a below ground attenuation solution was not supported [REP1-045 para 20.94].
SCC comment		The catchments served by the northern and southern basins have not been identified on plan, based on established topography
Appendix A	LAYOUT PLAN SHOWING ATTENUATION STORAGE REQUIREMENTS	Infiltration basin 1 is shown as two separate basins, connected by pipework, however it is modelled as one single large basin, either the plan or calculations should be amended to accurately represent the proposed drainage strategy.
Appendix B	MAIN DEVELOPMENT INFILTRATION AND ATTENUATION STORAGE REQUIREMENTS	<u>Area 1</u> Utilises crated storage (see response to 7.1.14) Utilises FSR rainfall methodology. No comparison is made against FEH methodologies. No climate change allowance has been included. Extent of 16.854ha catchment not shown on plan Other design assumptions such as side slope gradients are unknown <u>Area 2</u>

		Utilises FSR rainfall methodology. No comparison is made against FEH methodologies. No climate change allowance has been included. Catchment of 0.62ha noted on Appendix A plan Water depth of 1.2m exceeds recommended maximum in national guidance Other design assumptions such as side slope gradients are unknown <u>General comment</u> Area 1 uses an outflow of 50l/s. Area 2 uses an outflow of 5l/s. Area 1 does not have an inflow of 5l/s from Area 2. Therefore, the infiltration basin is modelled with an inflow of 55l/s (combined outflows from Areas 1 & 2), not 50l/s, stated throughout this document. <u>Infiltration basin</u> Utilises FSR rainfall methodology. No comparison is made against FEH methodologies. No climate change allowance has been included. Only inflows are from Areas 1 & 2. No other catchment input is detailed. Does the entire site drain to the southern attenuation before being pumped

		back north? SCC would expect areas that can drain by gravity to the northern basin, to do so. Water depth of 1.2m exceeds recommended maximum in national guidance. The infiltration rate used for design is different to that identified in Table 1. A Factor of Safety (FoS) of 2 has been used, but no explanation has been provided as to why this was determined to be a suitable FoS.
Appendix C	SITE ENTRANCE INFILTRATION STORAGE REQUIREMENTS	Whilst this exercise to determine maximum space requirements with a minimum infiltration rate is encouraged. The half drain time is unacceptable. SCC recommend this exercise is completed again, with a design infiltration rate of 10mm/hr. If half drain still exceeds 24 hours, either increase the plan area of the basin or allow for an additional 1:10+CC follow on storm event after 24 hours to determine worst case sizing. Utilises FSR rainfall methodology. No comparison is made against FEH methodologies. No climate change allowance has been included. Water depth of 1.2m exceeds recommended maximum in national guidance.

		A Factor of Safety (FoS) of 2 has been used, but no explanation has been provided as to why this was determined to be a suitable FoS.

Appendix G: Freight Management Facility Drainage Design Note [REP7-060]

Ref	SZC Co statement	SCC Deadline 8 response
5.1.2	Infiltration testing in accordance with BRE365 (Ref. 1) was undertaken and the results are shown in Table 1.	The detailed results of infiltration testing have not been seen by Suffolk County Council. This information should be submitted to the examination in support of the proposed drainage strategy. It is not possible to confirm the accuracy of this statement without seeing the results of infiltration testing.
Table 1	Freight management facility site infiltration test trial hole results	As per BRE 365 methodology (paragraph 3.2.3), the lowest of the three test results should be used for design. TP01 & TP03 are considered to have failed due to the low results achieved. TP02 is considered to have an achieved design infiltration rate of 119.52mm/hr. Results of infiltration testing should be submitted to SCC as part of the examination. These results should be accompanied by borehole logs, as encouraged by national guidance. No assessment of soil conditions

		has been made to understand why infiltration rates vary so much across the site. It is unclear to what extent the soils with good infiltration are present across the site, and vice versa for soils with poor infiltration.
6.1.3	All of the internal roads and the HGV parking areas will have an impermeable surface. Surface water runoff will be drained via surface outlets, gullies, linear channels and drains, etc. These will discharge into underground carrier drains.	If all internal roads are proposed to be impermeable, drained by traditional drainage, directly into the crated system, where is adequate treatment of the surface water being provided for a site that is assigned a high pollution hazard level using the CIRIA SuDS Manual Simple Index Approach?
6.1.5	The concept design submitted for DCO and shown in Plate 1 provided for underground carrier drains which will discharge all surface water runoff into two underground attenuation storage tanks from where it will infiltrate to ground. The tanks are proposed to be located beneath the landscape bunds located on the east and west sides of the site.	All attenuation for this site is proposed in a below ground crated system. This approach does not comply with the following documents due to the lack of pollution treatment, biodiversity and amenity benefits associated with such an approach: • Local Plan Policy SCLP 9.6, particular attention drawn to paragraph 9.59 • Local Guidance - Suffolk County Council Flood Risk Management Strategy, Appendix A • National Guidance - CIRIA SuDS Manual The infiltration rate is stated as an average of the values obtained through testing. As per BRE 365 methodology (paragraph 3.2.3), the lowest of the three test results should be used for design. Therefore, this

		methodology and all subsequent information based on this result (including appended calculations) are not accepted by SCC. SCC made it clear in in East Suffolk Council & Suffolk County Councils Local Impact Report that a below ground attenuation solution was not supported [REP1-045 para 20.85].
6.1.6	The size of the tanks calculated for concept design stage was 88 m long x 22 m wide x 0.6 m deep. The surface water drainage network capacity was assessed by hydraulic calculation. The calculation was based on the average of measured infiltration rates at TP01, TP02 and TP03 and a requirement for the tanks to drain down by half their storage volume in 24 hours. For a 1 in 30 year return period rainfall event it was found that there was insufficient storage and as a result it is proposed that additional storage volume be provided by swales	SCC do not support the use of average infiltration rates for design purposes. This does not conform to BRE 365 methodology. Swales have not been included in hydraulic model which appears to have sized the below ground tanks for 1:100+CC.
6.1.14 & Table 2	The Option 1 tank size has been determined by a requirement for it to be located within the unpaved area to the west. The available size has been used in hydraulic modelling. A summary of predicted hydraulic performance is shown in Table 2 with full results in Appendix B.	As per SCC's response to Table 1, the results of TP01 conclude that infiltration is not feasible in this location. Option 1 of the proposed drainage strategy is therefore discounted.

Table 3	Freight management facility option 2 storage tank parameters	As per SCC's response to Table 1, in accordance with BRE 365 methodology, TP02 is considered to have a design infiltration rate of 119.52mm/hr. This is 32.88mm/hr less than the average number stated in Table 3. All subsequent information based on this figure (including appended calculations) is not accepted by SCC.
8.1.2	Surface water highway runoff will be removed by "over the edge" flow and collected in swales for disposal by infiltration to ground. The proven infiltration rates in the locale demonstrate that this is feasible. When the swales dimensions are determined at detailed design, if necessary, an underlying filter drain will be provided to increase the efficiency of infiltration.	The design of the drainage is still a matter of discussion between SCC and the applicant. Through the technical approval process SCC have requested that it has a preference for swales to be located at the top of embankments to ease maintenance and avoid erosion of the slopes, subject to an arrangement that would not destabilising the earthworks. SCC expect that the drainage design will follow the principles in CD501 Design of Highway Systems and associate DMRB documents unless otherwise agreed with the authority.
9.1.4	The freight management facility drainage design will be based on CIRIA C753 SuDS Manual (Ref. 2), Design and Construction Guidance for Foul and Surface Water Sewers (formerly Sewers for Adoption) (Ref. 3), and PPG4 Treatment and Disposal of Sewage where no Foul Water Sewer is Available (Ref. 4).	Principles of CIRIA SuDS Manual encourage above ground SuDS to maximise biodiversity and amenity benefits. It also contains methodologies for assessing and mitigating pollution hazards caused by proposed development. Neither these principles or methodologies have been applied to the development of this sites surface water drainage strategy.

Appendix B	OPTION 1 STORAGE TANK HYDRAULIC CALCULATIONS	Not reviewed as per response to 6.1.14 & Table 2.
Appendix C	OPTION 2 STORAGE TANK HYDRAULIC CALCULATIONS	Utilises crated storage (see response to 7.1.14). Utilises FSR rainfall methodology. No comparison is made against FEH methodologies. No climate change allowance has been included. Areas accounted for in impermeable areas not illustrated on any accompanying plan. As per response to Table 3, infiltration rate not accepted. Infiltration through base unlikely to be reliant through design life of development, especially given lack of upstream treatment and the nature of adjacent sandy topsoil.

[REP7-061] COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH16

Chapter 20: Flood and Water

Ref	SZC Co. Statement	SCC Deadline 8 response
Table 8 Line 1 Whilst infiltration rates have been shared with SCC for MDS, the raw data (results of infiltration testing) has not been provided for this site. Infiltration rates, including the raw data have been provided for LEEIE. SCC have not received design calculations for either of these sites, contrary to the Applicants statement.	SZC Co. has subsequently shared the raw infiltration data and source control calculations with SCC.	Raw infiltration data has been shared for the Main Development Site. However, only 2021 testing accords with BRE365 methodology. Unfortunately, SZC Co. have not provided a plan to accompany 2021 testing. Despite a specific follow up request for this plan, it has not been provided to SCC. Calculations for LEEIE have not been provided to SCC.
Table 8 Lines 2 and 4 Whilst the Outline Drainage Strategy sets out basic principles and proposed strategies, as a standalone document, it is not sufficient to demonstrate that sufficient & suitable mitigation can be delivered within the Order Limits in accordance with national and local policy, best practice and guidance. The FRA & ES are reliant on the implementation of	SZC Co. has submitted a series of drainage technical notes that validate the Outline Drainage Strategy [REP2-033] and Drainage Strategy (Doc Ref. 6.3 2A(B)) (submitted at Deadline 7). The additional information and detail demonstrate how the design solutions can be developed within the site boundaries: • Appendix B 'ACA Drainage Strategy Technical Note (DCO	SCC's individual responses to each of these technical notes and our representation made at ISH11 gave details on why SCC consider the level of information provided to date is insufficient.

SuDS as primary mitigation. It must therefore be demonstrated that this primary mitigation can be delivered, in accordance with national and local policy, best practice and guidance. Without this detail, it is not possible to rely on this primary mitigation in the ES. This work must therefore be completed as part of outline design during the Examination. Detailed design would be required for Requirement 5.	Task 4)' and Appendix D 'Main Development Site Water Management Zone Summary (DCO Task D2)' to SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) Appendices (Doc Ref. 9.54) [REP5-120]. • Appendix F 'Sizewell Link Road Preliminary Drainage Design Note', Appendix G 'Two Village Bypass Preliminary Drainage Design Note' and Appendix H 'Yoxford Roundabout Updated Drainage Strategy' to SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) Appendices (Doc Ref. 9.54) [REP5-120]. • Appendix E 'Temporary Marine Outfall Operation Summary (DCO Task D3)' to SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) Appendices (Doc Ref. 9.54) [REP5-120]. • Appendix A 'Northern Park and Ride Drainage Design Note' to Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent	

	Written Submissions to ISH1-ISH6 – Appendices (Doc Ref. 9.63) [REP6-024]. • Southern Park and Ride Drainage Design Note submitted at Appendix F to this document. • Freight Management Facility Drainage Design Note submitted as Appendix G to this document. SZC Co. is developing a further drainage design note for the green rail route.	
Table 8 Line 4 Whilst productive discussions on Sizewell Link Road, Two Village Bypass and Yoxford Roundabout have taken place, the level of information shared with SCC to date, short of results of infiltration testing, is limited. No comprehensive outline surface water drainage strategy has been presented with supporting calculations, plans and sections, for either of these three schemes	SZC Co. will provide the calculations to SCC for the Sizewell link road, two village bypass and the Yoxford roundabout prior to Deadline 8. The plans and sections form part of the next design stage and will be provided at that time, once fully developed, further to Requirement 5 of the draft DCO (Doc Ref. 3.1(F)).	Plans and sections are vital to understanding the proposed surface water drainage strategy, to determine the required land take, using a Rochdale Envelope approach, ultimately ensuring that the Applicants primary mitigation is deliverable within the Order Limits.
Table 8 Line 5 SCC acknowledge that the latest surface water drainage design iteration for LEEIE uses appropriate principles.	SZC Co. believe they have provided sufficient information within the following documents to demonstrate that the LEEIE design	No calculations have been provided for LEEIE. The size of proposed SuDS features therefore remains unknown. The greenfield

However, SCC have not been provided with sufficient detail at this stage to be in a position to confirm that the design is sufficient to manage a 1:100 + climate change rainfall event.	can manage a 1:100 + climate change storm event: • Appendix B 'ACA Drainage Strategy Technical Note (DCO Task 4)' and Appendix D 'Main Development Site Water Management Zone Summary (DCO Task D2)' to SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) Appendices (Doc Ref. 9.54) [REP5-120].	runoff rate has not been agreed with SCC or other stakeholders. The pollution assessment undertaken in the technical note overestimates the level of pollution mitigation provided by the proposed drainage strategy, but nonetheless, still fails to provide sufficient treatment in some areas. SCC therefore dispute that this can be considered sufficient information to demonstrate that primary mitigation is deliverable for LEEIE, to prevent and increase in surface water flood risk or pollution of surface water.
Table 8 Line 8 SCC requires detail for sites proposing direct connections into below ground attenuation structures from traditional gully and pipes systems and does not see monitoring and maintenance as sufficient mitigation for problems that may arise from this approach.	SZC Co. has not developed the preliminary design at this stage for the southern park and ride and freight management facility, which incorporate below ground attenuation structures. This design stage will support Requirement 5 and address this specific concern raised by SCC.	Why has preliminary design not been developed for these sites? This is primary mitigation which must be demonstrated as both suitable, sufficient and deliverable within the Order Limits. The use of below ground attenuation structures is contrary to: Local Plan Policy SCLP 9.6, particular attention drawn to paragraph 9.59

		Local Guidance - Suffolk County Council Flood Risk Management Strategy, Appendix A National Guidance - CIRIA SuDS Manual
Table 8 Line 9 SCC cannot say with any certainty what the proposed operational drainage strategy is. This remains a serious concern.	SZC Co. has focused effort on the highest risk and largest scale activities, and those delivered in the near future. The ongoing data collection, design development and operation of the construction water management zones will provide considerable and valuable information for the subsequent design of the operational (non-nuclear island) drainage, which are far smaller in scale and risk, and are to be delivered towards the end of the construction period. These designs will be required to fulfil Requirement 5. For SZC Co.'s response to the draft Deed of Obligation (Doc Ref. 8.17(F)) comments from SCC, see section 2.3 of this document. For the main platform, the operational design is ongoing and being developed in tandem with ongoing safety case	The DCO being applied for includes the operational phase. As such it is insufficient to state that this will be dealt with at an undetermined time in the future. The onus is on the Applicant to demonstrate that the impacts of the proposed development can be mitigated through the proposed primary mitigation, which must be demonstrated as being suitable, sufficient and deliverable within the Order Limits.

	assessments which extend beyond the period of Examination.	

Section 2.19 Appendices to SZC C. Comments on Submissions from Earlier Deadlines

Throughout this section SZC Co. state on multiple occasions that they believe they have provided an appropriate level of information and assurance. As per SCC's representation made throughout this response and our submission made at ISH11, we do not support the Applicants conclusion on this matter.

[REP7-018] APPENDIX 2A OF THE ENVIRONMENTAL STATEMENT: DRAINAGE STRATEGY – TRACKED CHANGES VERSION

The updated Drainage Strategy contains further descriptions and references, when compared to the Outline Drainage Strategy that it supersedes. However, the bulk of the technical detail (which overall is still lacking) is not contained in this document and is instead located in the Technical/Design Notes to which this document refers.

Ref	SZC Co. Statement	SCC Deadline 8 response
2.5.16	In places where there is potential for increased risk of pollution or threat to receiving watercourses/sewers, proprietary systems will be considered and if necessary be used as a fail-safe method of treatment to supplement primary treatment observed using SuDS techniques. This will be explored further	Confirms that proprietary systems may be used as a fail-safe method of treatment to supplement the primary treatment delivered by SuDS. As such, it is critical that it is demonstrated there is sufficient space allocated for these primary SuDS to be designed as required

	in future design stages on a risk management basis.	by CIRIA SuDS Manual in order to be considered a level of treatment.
2.6.3	On the main development site, there is a very wide variation in infiltration capability across the site. The local source control elements and the detention basins have been sized using infiltration to ground as much as possible. The infiltration rates from site investigation reports from 2014 – 2020 have utilised the poorest infiltration rates to determine the worst case scenario for sizing SuDS structures.	Confirmation that designs have utilised infiltration rates achieved from 2014-2020 testing. This testing generally consists of falling head tests or tests that do not comply with BRE 365 methodology.
3.3.20	The site entrance hub will follow the same guidelines as laid out in this Drainage Strategy.	Figure 2A.4, appended to this document suggests that the site entrance hub is included within the catchment of WMZ6. This is also supported by the MDS WMZ Technical Note [REP5-120, Appendix D]. Also supported by Plate 3.5 of this document.
3.4.36	If further detailed testing reveals that infiltration rates do not indicate sufficient runoff acceptance within these WMZs then infiltration management will be supplemented with runoff to local watercourses at runoff rates (greenfield) previously agreed with stakeholders in accordance with the SuDS hierarchy.	Discharge to which watercourses and where?

SCC RESPONSE TO [REP7-061] COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH6

Ref	SZC Co statement in [REP7-061]	SCC Deadline 8 response
2.8.3	To confirm, the ESL bridge is expected to be completed in late 2023. In relation to the question on the Middleton Moor link, all off-line works associated with Middleton Moor Link Road will be constructed in line with Sizewell link road to assist with cut and fill balance. The online section, namely Middleton Moor Link Roundabout and associated approaches from the B1122, will be constructed following the opening of the Sizewell link road. This will ensure that all SZC traffic and local traffic have a suitable, short diversion around the tie in works.	SCC welcomes confirmation of the delivery of the Middleton Moor Link. SCC note that until the ESL bridge is available construction traffic for the SLR east of the ESL will have to use the B1122 and that these movements are included within the 600 HDV movement cap in the early years.
2.8.4 and 2.8.5	SCC has sought further details on how the haul roads within the Sizewell link road site will operate to allow for the movement of fill between the Sizewell link road, two village bypass and the Main Development Site. With regards to this comment, the use of haul roads along the Sizewell link road will provide an advanced means of access west to east, i.e. from the A12 to the B1122 south east tie in. Following the construction of the ESL over-bridge in late 2023, the majority of the Sizewell link road traffic will be removed from the B1122 by utilising the haul roads. These haul roads will either use completed sections of the Sizewell link road or temporary haul routes constructed parallel to Sizewell link road within the order limits. These will be temporary in nature and phased so as not to impede the construction of the main Sizewell link road works	SCC welcomes the clarification on this matter; further discussions will be needed on how it is proposed access to the haul road will be enabled. SCC welcomes commitment to early delivery of the Sizewell Link Road, as set out at Section 2.8.13, roundabout junction to allow for safer right turn movements from the A12 to the SLR and to minimise impacts during construction. SCC welcomes reducing the impacts on the B1122 during construction where those impacts do not lead to other material effects. Importantly the Applicant has agreed to the proposed HDV cap including movements through the communities on the B1122 [REP7-062], as set out in the proposed changes to the management plans.

	This strategy will allow for the movement of material within Sizewell link road from the east (general area of cutting) to the west side (general area of fill) of ESL and for the movement of material along the Sizewell link road to the Main Development Site from the two village bypass, Sizewell link road and other associated developments without adding HGVs to the B1122.	
2.8.6	SCC has requested clarity on whether vehicle totals at paragraph 2.4.20 of the Description of Development allow for movement of fill to main site. Refer to SZC Co.'s response to ExQ2 TT.2.14(Doc. Ref. 9.71) on this matter.	Noted.
2.12	Rights of Way Access Strategy	The following matters remain under discussion: 2.12.3 and 2.12.4 alignment of FP21 in relationship to the coastal defence features. SCC maintains its position that the permanent route of FP21 should be along the top of the hard coastal defence feature. . 2.12.6 This point relates to SCC's request for an off road link from BR19 to Eastbridge adjacent to Eastbridge Road. SCC believes the lack of an off road continuation from the northern terminus of BR19 to Eastbridge adjacent to Eastbridge Road is not acceptable. The creation of an off road link is covered in the PRoW Fund in the Deed of Obligation, but this would rely on Highways Act powers where an objected order is determined by the Secretary of State and thus not secure.

		2.12.5 SCC does not require the crossing of Lovers Lane to Kenton Hills to be signalised. During construction this will not form a through route and in the operational phase when BW19 is reopened the volume of road traffic will be substantially less. Nevertheless, SCC requests SZC Co ensure the crossing is properly audited to ensure it is a safe crossing. SCC comments on 6.3 Chapter 15 Amenity and Recreation Appendix 15I of the Environmental Statement: Rights of Way and Access Strategy Rev 4.0 – Tracked Changes Version 1.1.6 Bullet point 2's comment to "to minimise as far as possible any reductions in connectivity in and around the development, especially north-south" downplays the Sandlings Walk's importance, and is counter to SCC's wish the path should be a PRoW, and should be deleted. Bullet point 10 – the reference to building a legacy benefit to maintain and enhance recreational access that will perpetuate beyond the construction phase is welcome. Operation phase bullet point 1 – the deletion of restoring original PRoW "where practicable" is welcome. 1.2.5 & 1.2.7 The alignment of FP21 relative to the coastal defence is not yet agreed. 1.2.9 Minor but "The route would have a suitable firm surface" should read "routes".

		1.2.11 Addition of the BLF deck also allowing equestrian use is welcome. 1.2.13 SCC notes this new para and that equestrians will have to dismount to ensure safe crossing underneath the permanent BLF, via the use of mounting blocks. The county council considers this acceptable only on the condition the levels are incapable of being designed to allow mounted access under the BLF. 1.2.28 SCC seeks clarification which s.106 agreement (now DoO) covers the funding provision for the new public access at Aldhurst Farm. 1.2.32 As raised previously, there is only one highway authority therefore reference to improvements to PRoW and permissive footpaths being agreed by the relevant authorities is misleading. Only SCC can implement improvements to PRoW, and thus must be the final decision maker on those improvements. 1.2.33 The reference to “All existing permissive footpaths would remain as permissive footpaths” is not agreed in respect of Sandlings Walk. 1.2.35 As above, the alignment of FP21 relative to the coastal defence is not agreed as yet. 1.2.41 SCC contends the “formalised permissive footpath” from Kenton Hills car park connecting to the “extensive permissive network” should be public where it relates to the Sandlings Walk.

		1.2.42 Bullet point 5 – again SCC contends the "formalised permissive footpath" from Kenton Hills car park connecting to the "extensive permissive network" should be public.
2.18.13	SCC highlights four key areas of concern as set out below. SZC Co.'s response at Deadline 7 is provided alongside each.	Given the structure of the Table, it has been responded to separately below.
2.20.3	SZC Co has agreed with ESC an approach to the phased delivery of Project Accommodation, linked to Housing Fund contingency payments, which is set out in detail in [Appendix 3B to CI.2.1, 2, 3 to Doc Ref. 9.71]	SCC as highway authority notes that delivery of the accommodation campus also impacts on transport matters, specifically movement of NHB workers. The authority would be concerned that delays in delivery of the campus would create difficulties in achieving the mode share targets stated in the CWTP as the majority of walking and cycling trips to the site are related to workers using these facilities.
2.20.4	SZC Co.'s response to SCC's comments on Written Summaries of Oral Submissions at ISH2 and ISH3 [REP5-107 and REP5-108] are set out below. A number of comments do not require further response, and so these have been omitted from the table below in the interests of brevity.	Given the structure of the Table, it has been responded to separately below.
2.21.11	A number of comments in SCC's Deadline 6 submission [REP6-049] are addressed directly in the table below.	Given the structure of the Table, it has been responded to separately below.
3.2.1 and 3.2.2	At Deadline 6, ESC [REP6-032] commented on SCC's submission regarding an alternative outage car park.	See SCC comments to the Applicant's response to ExQ LI.2.9 below, in **Error! Reference source not found.**..

	SZC. Co supports the concerns raised by ESC in respect of the likely disruption caused by temporary park and ride facilities on local residents and also from a landscape and visual perspective.	
3.2.5	At Deadline 6, SZC Co. committed to providing further information on electric vehicle charging points and the use of low- or zero-emitting buses [REP6-025]. This is addressed in the ExQ2 responses (Doc Ref. 9.71).	Noted, this is responded to in our response to [REP7-071].
4.3.1	An updated Construction Traffic Management Plan(CTMP) (Doc Ref. 8.7(B)) and Construction Worker Travel Plan(CWTP) (Doc Ref. 8.8(B)) will be submitted at Deadline 8. The updated management plans will take account of feedback at the Issue Specific Hearings and subsequent discussions with ESC and SCC. The draft DoO (Doc Ref. 8.17(F)) has been updated to address feedback on the clarity of commitments in respect of the CTMP and CWTP. In respect of the CTMP and CWTP, the updated draft DoO includes: Drafting to confirm the power of the Transport Review Group to require SZC Co. to submit mitigation measure for its approval to address the impact of any shortfalls or exceedances against the targets or limited within the CTMP and CWTP identified through the monitoring and ensure SZC Co. is required to implement any approved mitigation measures.	SCC welcomes the submission of the updated management plans, and, whilst not all areas have reached agreement, we in general welcome the proposed inclusions. As set out at [REP6-049], SCC is aiming for the monitoring to be as comprehensive and up to date as possible to ensure that any potential exceedances are identified as early as possible and to enable as swift a response as reasonably possible. There are ongoing discussions with the Applicant, and good progress has been made in recent weeks on this matter.
4.3.2	An updated transport environmental assessment has been included within the Fourth Environmental Statement (ES) Addendum (Doc Ref. 6.18) submitted at Deadline 7.	Noted. This is responded to in our response to [REP7-030].

SCC RESPONSE TO [REP7-062] COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH6 APPENDIX H: SUMMARY OF CHANGES TO BE MADE TO THE TRANSPORT MANAGEMENT PLANS

Ref	SZC Co statement in [REP7-062]	SCC Deadline 8 response
Table 2.1 – CTMP	Section 1 – Introduction	SCC welcomes the proposed change and awaits submission of the document at Deadline 8.
Table 2.1 - CTMP	Section 2 – Management Structure	SCC in general welcomes the proposed changes; however, SCC does not consider current TRG proposals as appropriate or effective. Its D8 [ISH14 post hearing submission] sets out three options to make the TRG effective: (1) the voting rights of the TRG to be unequal in favour of SCC, ESC, Suffolk Constabulary and National Highways; or (2) SCC given a casting vote on the TRG; or (3) TRG is set up as a non-voting group that would seek consensus, and, in the exceptional circumstance where there is a dispute, the issues should be resolved by referral to seniors and ultimately expert dispute resolution.
Table 2.1 - CTMP	Section 3 – Freight Management	SCC welcomes the proposed changes within Section 3.
Table 2.1 - CTMP	Section 4 – Measures and controls for HGVs to/from the main development site	SCC welcomes the proposed changes within Section 4, specifically the time constraints proposed in the update of paragraph 4.4.13. SCC notes that the definition of local HGV's is yet to be agreed but welcomes SZC Co's commitment to do so.
Table 2.1 - CTMP	Section 5 – Management of Associated development site HGVs	SCC welcomes the proposed changes within Section 5.

Table 2.1 - CTMP	Section 6 – Management of LGVs	SCC welcomes the proposed changes within Section 6.
Table 2.1 - CTMP	Section 7 – Management of AILs	SCC welcomes the proposed changes within Section 7.
Table 2.1 - CTMP	Section 8 – Monitoring and Review	SCC welcomes the proposal that the methods of monitoring in table 8.1 will be set out in more detail but notes these have yet to be agreed although all parties are working towards agreement.
Table 2.1 – CTMP	Section 9 – Compliance and Enforcement	SCC welcomes the proposed changes within Section 9.
Table 2.2 – CWTP	Section 1 – Introduction	SCC welcomes the proposed changes within Section 1.
Table 2.2 – CWTP	Section 2 – Management and Structure	SCC in general welcomes the proposed changes; however, SCC does not consider current TRG proposals as appropriate or effective. Its D8 [ISH14 post hearing submission] sets out three options to make the TRG effective: (1) the voting rights of the TRG to be unequal in favour of SCC, ESC, Suffolk Constabulary and National Highways; or (2) SCC given a casting vote on the TRG; or (3) TRG is set up as a non-voting group that would seek consensus, and, in the exceptional circumstance where there is a dispute, the issues should be resolved by referral to seniors and ultimately expert dispute resolution.
Table 2.2 – CWTP	Section 3 – Objectives and Targets	SCC welcomes the proposed changes within Section 3.
Table 2.2 – CWTP	Section 4 – Travel Plan Measures	SCC welcomes the proposed changes within Section 4.

		With regards to the electric vehicle charging provision, this has been responded to in our response to the Applicant's Actions Arising from Issue Specific Hearing 8 [REP7-071].
Table 2.2 – CWTP	Section 5 – Monitoring and Review	SCC welcomes the proposed changes within Section 5. However, we understand that there is potentially some disagreement with the Applicant on the extent of monitoring required and are working towards agreement.
Table 2.2 – CWTP	Section 6 – Enforcement	SCC welcomes the proposed changes within Section 6.
TIMP	4.3 Holding Capacities within the IMA	SCC welcomes the information provided but requests that the capacity of the main site, including LEEIE is provided.
TIMP	Scenarios	SCC accepts the scenario testing as a realistic method of managing traffic during incidents. It notes that the authority proposed that the scenario of an outbound train missing the last departure time was also undertaken to identify any issues this would cause for the following days operations.

SCC RESPONSE TO [REP7-061] SECTION 2.8.3 OF COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH6

Given the tabular format of Section 2.8.3 of REP7-061, and as set out above, it has been responded to separately in the following table.

SCC Key Areas of Concerns as Summarise at Deadline 5	SZC Co statement in [REP7-061]	SCC Deadline 8 response
Para. 13. While SCC is generally satisfied with the traffic modelling and assessment of environmental impacts, we are awaiting final reports on a number of issues before reaching full agreement on these matters.	SCC's comment is understood to be primarily related to the on-going discussions to agree the transport effects within the Environmental Statement[APP-198] and Environmental Statement Addendum [AS-181]. SZC Co. has been working closely with SCC to agree the methodology and results. The revised assessment forms part of the fourth ES Addendum, which will be submitted to the Examination at Deadline 7.	SZC Co.'s understanding of this comment is correct. The Council notes submission of the document and has responded separately in our Response to [REP7-030].
Para. 14. While broad agreement has been reached on the management plans, a key remaining matter is controls and monitoring. SCC is in discussions with SZC Co. on these matters. SCC has identified an issue with process by which the Construction Workers Travel Plan transfers to the Operational Travel Plan. Discussions are in progress to clarify this transition process.	As noted in SCC's response at Deadline 5, discussions are continuing between SZC Co. and SCC to reach agreement on the proposed controls and monitoring measures which will underpin the Construction Traffic Management Plan[REP2-054] and Construction Worker Travel Plan [REP2-055]. Recent discussions have yielded significant progress in reducing the number of points of difference. A revised CTMP and CWTP will be submitted at Deadline 8, incorporating agreed changes. As stated in the Written submissions responding to actions arising	SCC agrees with the Applicant that significant progress has been made recently and notes that revised CTMP and CWTP will be submitted at Deadline 8. However, there do currently remain some areas where we have not reached agreement and discussions are ongoing, but the number of areas has significantly reduced since previous submissions. A matter of discussion is the commencement of the operational travel

	from ISH3 [REP5-115] SZC Co. will prepare an outline Operational Travel Plan (OTP) to be discussed with SCC and submitted to the Examination at Deadline 8. The revised draft Deed of Obligation(Doc Ref. 8.17(F)) submitted at Deadline 5 clarified in part 2 of Schedule 16 that SZC Co. will prepare a Framework OTP, which will be appended to the DoO. It states that SZC Co. will submit a draft OTP at least 6 months before the end of the Construction Period, for the approval of SCC, ESC and Highways England. The OTP will be enforced for a period of five years from the end of the Construction Period. The end of the "Construction Period" is defined in part 1 of the draft DoO (Doc Ref. 8.17(F)) as occurring at the receipt of fuel for Unit 2.	plan. SCC's opinion is that this should be in advance of the first operational worker to ensure that sustainable travel behaviour is encouraged from the beginning as there will be significant differences between the situation in the construction and operational phases. The Council also notes and welcomes confirmation of submission of the Framework Operational Travel Plan. SCC have previously set out that the Operational Travel Plan should be voluntarily extended beyond the five-year life proposed [REP6-049]. The authority notes that its guidance is that funding should be provided to support monitoring for the first five years, not that a travel plan should only last for five years.
Para. 15. SCC retains its position that the SCC chair should have a casting vote in the TRG.	Section 1.3 of the Written submissions responding to actions from ISH3[REP5-115] describes SZC Co.'s response to matters in relation to the TRG that were raised at ISH3. In particular, it notes that SZC Co. will review drafting of the draft Deed of Obligation, CTMP and CWTP to clarify or address the powers of the Transport Review Group (TRG) and its ability to enforce the controls in the CTMP and CWTP, the responsiveness of the TRG and protocols in place to resolve an inability of the TRG to reach agreement. SZC Co. do not agree that SCC or	SCC does not consider current TRG proposals as appropriate or effective. Its D8 [ISH14 post hearing submission] sets out three options to make the TRG effective: (1) the voting rights of the TRG to be unequal in favour of SCC, ESC, Suffolk Constabulary and National Highways; or (2) SCC given a casting vote on the TRG; or

	any other member of the TRG should have a casting vote. See SZC Co.'s response to ExQ2 TT.2.0 for a response on this matter.	(3) TRG is set up as a non-voting group that would seek consensus, and, in the exceptional circumstance where there is a dispute, the issues should be resolved by referral to seniors and ultimately expert dispute resolution.
Para. 16. SCC's detailed comments on transport related items in the deed of obligation are included in the separate SCC Deadline 5 submission on the Deed of Obligation.	For SZC Co.'s response to the draft Deed of Obligation comments from SCC, see section 2.3 of this document.	Noted.

SCC RESPONSE TO [REP7-061] SECTION 2.8.13 OF COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH6

Given the tabular format of Section 2.8.13 of REP7-061, and as set out above, it has been responded to separately in the following table.

SCC Key Areas of Concerns as Summarised at Deadline 5	SZC Co statement in [REP7-061]	SCC Deadline 8 response
Can SZC Co. give any indication as to the likelihood of the bidding process being unsuccessful or the timetable being affected or disrupted by other works? Trains travelling from Birmingham are likely to route via Ely which has limited, if any, spare capacity. SZC Co. is requested to confirm that capacity to route trains from Birmingham has been discussed with operators and Network Rail.	The timetable planning process has a c.24 month lead time, and SZC Co. is undertaking a pathing study to ensure these requirements are available in advance of this period commencing for the relevant timetable change. As part of the pathing study, paths have been identified from the origin points through to Sizewell, including through Ely where required. The paths comply with the relevant timetable planning rules, and these account for items such as line closures for maintenance. SZC Co . has an ongoing dialogue with Network Rail's freight team, and emerging findings of the pathing study continue to be regularly shared.	SCC welcomes the information provided however still remain unsure of the likelihood of the bidding process being unsuccessful, and what this would mean for the proposals.
SCC would suggest aspirational targets for the proportion of marine and rail should be set. However, SCC notes with some concern that, notwithstanding the helpful statement of intent by Mr Davies, SZC Co. also stated (at para 1.2.14) that 'a binding commitment to maximise marine would unnecessarily cut	SCC's comments regarding maximising marine where practicable are noted and understood. To this extent SZC Co. has a shared objective. Marine and rail both offer reductions to road import and the proportions between these non-road transport modes is based on the material type, nature and origin. SZC Co. will seek to	SCC welcomes the Applicant's commitment, and welcomes further discussion. SCC is of the opinion that there should be an aspiration to transport materials whilst taking into consideration the wider issues that the Applicant has

down on operational flexibility and the important resilience that flexibility provides'. SCC sees this as inconsistent. SZC Co. appears to want to take credit for making greater use of the marine facilities where achievable but is resistant to any suggestion that it should be obliged to identify or take up such opportunities. SCC accepts that there are practical reasons why greater use of marine could not be made into a 'hard control' but sees no reason why the FMS should not commit to maximising the use of marine where practicable. By recognising that the objective is subject to what is practicable, operational flexibility would be maintained.	continue to maximise these transport modes over road where practicable and economical as part of a blended approach to sustainable means of delivery. SZC Co. has set out its position on this and related delivery issues in response to the ExA's Commentary on the draft DCO and other documents (Doc Ref. 9.72) and in response to EXQ AI.2.0.	identified including environmental, and feasibility. As set out in our Response [REP7-163] to EXQ2 AL.2.0, SCC accepts that is would be 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 where possible. SCC welcomes the Applicant's commitment to monitor and report the modal split of construction materials. This should provide clarity for interested parties that the proposed modal share is being achieved and if not, that actions can be agreed between the TRG and SZC Co.
SCC would request SZC Co. to clarify if the site accommodation campus will generate any AIL movements, for example if constructed in prefabricated units.	The use of prefabricated modular units is intended for the construction of the accommodation campus. The size of these individual modules are well established with existing supply chain and haulage logistics to support their movement and delivery to sites. The general size is based on standard transport lengths up to 12.5m with a width of circa 3.5m, which would constitute AILs due to their width being over 2.9m. Allowance has been made for	Noted regarding inclusion within forecasts.

	pre-fabricated modular units being delivered to site within the AIL forecast.	
SCC notes that while Darsham Level Crossing has laybys enabling AILs to pull off the carriageway the Middleton Level Crossing does not.	The B1122 level crossing will primarily be used by AILs during the early years (i.e. prior to the SLR being operational) and to a lesser extent at peak construction just for AILs from the north. SZC Co. is liaising with the appropriate stakeholders to agree a protocol to allow AILs to notify Network Rail on their approach to the B1122 level crossing that they are about to cross it and have safely crossed it without having to stop and use the phone at the level crossing. The protocol will be incorporated into the CTMP.	Noted and SCC welcomes this clarification. SCC consider that this protocol should be referenced within the CTMP.
While considering delivery of the whole length of the SLR before commencement is desirable SCC considered that to place a Grampian condition to do so was not proportionate. However, it has made strong representations that the highway works affecting the A12 and B1122, for example the roundabouts and junction connections to the TVB, SLR and Yoxford Roundabout should be complete before the route is used by SZC construction vehicles to avoid disruption to road users including SZC Co. (15.27 in REP1-045). SCC sees no reason why these elements of the works cannot be prioritised as advance works within the construction programme set out in the Implementation Plan. (REP2-044). The phasing of these	The design of the tie in points on the existing highways, namely the A12 and B1122 have been developed so that the majority of the construction work can be undertaken off-line without disruption to traffic. The final tie in works will have a minimum impact on traffic flows. The delivery of these tie in points is scheduled to be undertaken early in the construction when the main works traffic will be at its lowest. The SLR tie in to the A12 and south-eastern end of the B1122 are the first works on the SLR to be undertaken in parallel with the ESL overbridge construction. The SLR strategy to complete the main alignment prior to the online works for the Middleton Moor roundabout and B1125 junctions ensures these works do not conflict with the SZC construction traffic or general traffic. In addition, the same	SCC welcomes clarification on the delivery of the tie in works and ESL Overbridge. SCC sees minimising impacts associated with delivery of highway works as crucial, and sees the most logical way of doing this as delivering the highway works affecting the A12 and B1122 as soon as possible, and before the route is used by SZC construction vehicles, as set out in our response 1.3.17 at [REP6-049]. SCC welcomes discussions around detailed phasing and the associated

works is a matter that SCC expects to see adequately addressed in the Implementation Plan but if that is not the case then a requirement would be appropriate to ensure they are delivered in advance of the construction commencing on the MDS.	approach has been adopted for the TVBP, with focus initially on the Friday Street roundabout and then the southern A12 roundabout. The delivery of Yoxford roundabout is also phased early in the construction programme, with the same design philosophy to maximise the offline construction. Detailed phasing continues to be developed to minimise the impact on traffic flows for both the existing highway users and SZC construction	traffic management proposals. SCC notes that within the constraints of the order boundaries the A1094 and B1122 are likely to present the greatest challenges in terms of disruption. SCC would encourage the Applicant to consider methods of working that minimise the overall impact of construction. In this respect it is willing to consider concurrent sections of traffic management on the A12 or B1122, subject to it being safe to do so.
SCC was unaware that significant volumes of fill were expected to be moved from the TVBP and SLR to the main site. The use of a haul road on the alignment of the SLR to remove these trips off the B1122 is welcomed. However, SCC is mindful that this requires early delivery of a bridge over the East Suffolk Line and the construction of a haul route parallel to the SLR will complicate construction of the permanent works	A response to this issue has been provided in response to [REP5-058]: SCC comments on SLR DoO 2.4.17 and 2.4.20 (see Section 2.10).	Noted.
SCC will continue to engage with SZC Co. on our concerns; however, we remain of the position that more extensive monitoring of	Discussions are continuing between SZC Co. and SCC to reach agreement on the proposed controls and monitoring measures which will underpin the Construction Traffic Management Plan[REP2-054] and Construction Worker Travel	The Council agrees significant progress has been made and await submission of the updated CWTP, and is hopeful that the areas of disagreement have been

workforce numbers is required as per [REP3-079].	Plan[REP2-055]. Recent discussions have yielded significant progress in reducing the number of points of difference. In [REP3-079] SCC requested that the number of workers during the construction phase are monitored annually. The number of workers during the construction phase is to be monitored every 6 months through the workforce survey, which is secured in Schedule 3 of the Deed of Obligation, which has been agreed with SCC.	minimised, albeit that a small number of key matters are yet to be agreed. Through discussions, it is believed that the extent of monitoring, which was previously one of the key areas of disagreement is close to being agreed.
SCC is not convinced that restrictions on car parking and the mode share targets set out in REP2-055 are sufficient without adequate monitoring to provide early identification of issues. Appendix 7B of the Transport Assessment Appendices (Part 1 of 6) include the car park accumulation assessment [REP2-046]. The assessment shows that for a significant amount of the time the car parks have significant spare capacity indicating potential for additional vehicle movements without exceedance of currently proposed controls. Be that as it may, it also would not address SCC's concerns regarding greater number of movements during the peak periods than SZC Co. has assessed	Refer to SZC Co.'s response to ExQ2 TT.2.9 with regards to parking controls, which are to be controlled via Requirement 8, which has been amended as part of draft DCO submitted at Deadline 7 (Doc Ref. 8.17(F)). Parts 2a) and 2b) of draft Requirement 8 provide a control of the maximum limit of car parking within Work No. 1A before the northern or southern park and ride facilities are operational to 650 car parking spaces and after the northern or southern park and ride facilities are operational to 1,000 car parking spaces. Both the main development site car park and Land East of Eastlands are included in Work No. 1A. This is in addition to the car park phasing which is set out in Table 4.1 of the Construction Method Statement [REP5-048], which Requirement 8 requires SZC Co. to build and use the car parking in accordance with. It is considered that the combination of the car park phasing and the absolute limits on car parking set	The Applicant's response regarding TT.2.9. is noted. The Council welcomes the proposed controls on car parking set out within Requirement 8 of the Draft DCO [REP7-272] and that it covers both the Main Site and LEEIE. SCC seeks clarification whether there is a differentiation between Work No. 1a (z) and (ee), which refer to parking for the temporary park and ride and parking for the caravan park. The Council maintains our position as set out at Table 5 para 1.2. and Table 8 para 1.6.10 and 1.6.63 of REP6-049 that the controls on car parking numbers and mode share do not necessarily mean that impacts will not exceed those assessed.

	out in Requirement 8 alongside the commitment by SZC Co. to meet the mode share targets in the Construction Worker Travel Plan will ensure that the mode share targets are met. In addition, the CWTP proposes to provide an arrival and departure profile of buses in and out of the MDS as part of the quarterly transport monitoring report, which will provide a useful indication of the shift pattern. In addition it is proposed to undertake an Automatic Traffic Count (ATC) survey 1 week per quarter at the site accesses (i.e. MDS, LEEIE (early years) and northern and park and ride facilities), to provide monitoring data of the profile of arrival and departure of workers. Shift patterns do not change regularly and therefore it is considered that the proposed monitoring will provide sufficient data to the TRG to understand the movement of workers over the course of the day and in particularly during the peak periods.	The Council believe that regularly reported ATC or camera monitoring is an appropriate and reasonable way to forecast and respond to potential issues by providing up-to-date information and also allowing for reasonable day to day variance so as to not lead to unrepresentative results. However, through recent discussions progress has been made on the extent of monitoring and agreement on sufficient monitoring and reporting that would help to address our concerns and have early warning of potential exceedance.
As per 1.2.1 above and in SCC's Post Hearing Submission for ISH3 [REP5-174], further clarity is needed on how mode share targets are met in situations where infrastructure has not been delivered and the modal split cannot be achieved. SCC welcomes discussions with SZC Co. on this. The vast majority of trips by foot or cycle are by workers in the site campus. It should be	Requirement 8, Schedule 2 of the draft DCO (Doc Ref. 3.1(G)) defines the maximum number of construction car parking spaces that can be used before either the northern or southern park and ride site is available. This limits the number of car parking spaces to levels that are consistent with the mode share targets in the CWTP. The draft Deed of Obligation (Doc Ref. 8.17(F)) states that SZC Co. will use reasonable endeavours to	The Council welcomes the proposed controls on car parking set out within Requirement 8 of the Draft DCO [REP7-272]. SCC understands that the aim is to achieve these mode share targets once the relevant facilities are in places (in reality the mode share target is

noted that workers will have to drive to the site accommodation campus, as evidenced by the 1,360 parking spaces provided, and will make non-work related trips to and from the main site. See also 1.2.0 which excludes the site accommodation campus in SZC Co.'s consideration of parking.	deliver the accommodation campus in accordance with the Implementation Plan. As stated in SZC Co.'s Written summaries of oral submissions made at ISH3[REP5-108], the modal split targets cannot be achieved without this infrastructure in place. The early years mode share target by walk and cycle is 2% and by peak of the peak construction it is 30%. As with any Travel Plan mode share targets are set over a time period and progress is made to meet them through the continued implementation of the Travel Plan. This will be the case for Sizewell C. Once the northern/southern park and ride facilities are operational the Travel Plan commits to achieve the peak construction mode share targets. The CWTP is to be updated to enable the TRG to set interim mode share targets to monitor progress in achieving the proposed peak construction targets by the time the workforce is at its peak. The on-site campus would provide many facilities to suit the needs of workers for personal and social purposes to minimise the number of non-work based trips. In addition, SZC Co. is providing a free direct bus between the campus and Leiston and workers would also be able to access rail services at Darsham via the park and ride buses from the main development site. SZC Co. is providing significant improvements to walk and cycle facilities in the MDS area, which will enable workers living at the	unachievable until delivery of the accommodation campus); whilst this is appreciated, it is important to maximise sustainable transport movements prior to the facilities being in place to minimise traffic impacts. This is particularly important regarding the accommodation campus. SCC welcomes clarification on the TRG's ability to set interim targets and awaits submission of the updated CWTP. The TRG will be responsible for monitoring these issues and comprehensive monitoring is considered necessary to both get early warning signs of potential impacts and to identify unforeseen impacts. SCC maintains our position on the need for comprehensive monitoring, and believe we may be close to agreement on the level of monitoring, but await submission of the updated CTMP and CWTP. SCC continues to strongly support the Applicant's commitments to sustainable transport, including the walk and cycle infrastructure, accommodation campus, park and rides and direct bus services.

	campus to access local facilities by active travel. Notwithstanding this, the assessment takes account of non-work based vehicular trips which are forecast to occur. Appendix 7B of the Consolidated Transport Assessment [REP2-046] describes the derivation of non-work related trips associated with the main development site accommodation campus accounted for in the assessment.	SCC agrees that the non-work trips have been assessed reasonably within the transport modelling.
SCC remains of the opinion that if an impact resulting from construction traffic has not been assessed then it is not possible to determine the harm and therefore a process to avoid that potential harm is appropriate. It follows that monitoring to identify whether the development is exceeding the assessed parameters is reasonable. Whilst SCC can accept as a generality that not every element of a development which is assessed needs then to be reflected in either a control or monitoring, it is necessary to make a planning judgment as to what degree of regulation is required. That judgment is, necessarily site/case specific, having regard to the particular local context (here a predominantly rural road network not suited to construction traffic), the scale of the construction traffic activity, and the duration of the construction traffic activity. SZC Co. makes reference to the fact that this is a	Discussions are continuing between SZC Co. and SCC to reach agreement on the proposed controls and monitoring measures which will underpin the Construction Traffic Management Plan [REP2-054] and Construction Worker Travel Plan[REP2-055]. Recent discussions have yielded significant progress in reducing the number of points of difference. An updated position statement on the management plans is provided in the note entitled 'Summary of changes to be made to the Transport Management Plans' (Appendix H to this document).	The Council agrees significant progress has been made and await submission of the updated CWTP, but is hopeful that the areas of disagreement have been minimised, albeit that a number of key matters are yet to be agreed. SCC's position on TRG voting has been set out in our [post-hearing submission on ISH14] and other places within this document. Through discussions, it is believed that the extent of monitoring, which was previously one of the key areas of disagreement, is close to being agreed.

unique project in terms of scale, complexity, and duration. SCC concur with this appreciation and consider it pertinent to the controls place on traffic arising from construction of the project Automatic Traffic Counters (ATC) as identified at [REP3-079] are inexpensive and would in a lot of cases provide a sufficient level of monitoring to identify issues as they arise; SCC also does not understand how they would affect the delivery of the project. SCC remains of the view that monitoring (and the potential for remedial measures) is required to ensure that the development's construction traffic remains within the assessed effects.		
As above, SCC does not understand how ATCs and associated monitoring are considered to be a burden. Compared to quarterly surveys ATC allow real time collection of data and allow for more immediate responses to issues as they arise as well as to understand profiles and to identify atypical traffic patterns.	SZC Co. is concerned that SCC is seeking ATCs in order to validate data that is already being collected through the DMS and GPS systems and it is not necessary to collect two different types of monitoring data. SZC Co. has agreed to collect ATC data for 1 week per quarter at the site accesses to provide data on the arrival and departure profile of cars, which are not included in the DMS but it is not considered necessary to collect this data on a daily basis as shift patterns do not change on a daily basis. ATC data will also differ from DMS data as the definition of an LGV and HGV is different between the two monitoring systems. Further justification for the proposed approach to collecting data is set out in the note	SCC maintains our position regarding the extent of monitoring required. It is important that issues can be forecast, identified, and responded to as quickly as reasonably possible. SCC do not expect the Applicant to analyse daily data, but a live source that means it could be analysed if deemed necessary is considered reasonable. SCC does not see why the Applicant would be concerned if ATCs or cameras were used to validate the data they are providing. Such data can provide real

	entitled 'Summary of changes to be made to the Transport Management Plans' contained at Appendix H to this document.	time information without the delays of quarterly surveys and identify significant changes as they occur. SCC recognises that there might be issues with figures 'matching up' exactly and that determination of vehicle classes may not match exactly, but, as with any tool, awareness of the potential limitations would be part of the process of use. SCC consider providing confidence to the public and transparency is an important factor for consideration.
As per [REP3-079] and SCC's ISH3 Post Hearing Submission at Deadline 5 [REP5-174], SCC maintains its position that SCC should be able to have the casting vote in the event of a deadlock. As the local highway authority for the roads (and road users) most likely to experience impacts from construction traffic, SCC is well-placed to fulfil this role, acting in the public interest. Whilst Brightwell Lakes is a large scale development, its impact is more constrained geographically i.e. around Martlesham. It is not considered that the construction traffic activity is comparable in scale to SZC. SCC does not therefore consider that it provides a sensible	Refer to SZC Co. response to ExQ2 TT.2.0 with regards to the TRG and SCC's request for a casting vote (Doc Ref. 9.71).	Noted. SCC have responded to TT.2.0 in our Response to [REP7-055].

comparator in relation to the effect of SZC Co.'s proposal.		
SCC remains of the position that it should have the casting vote as per [REP3-079] and the SCC's ISH3 Post Hearing Submission submitted at Deadline 5 [REP5-174]	Refer to SZC Co. response to ExQ2 TT.2.0 with regards to the TRG and SCC's request for a casting vote (Doc Ref. 9.71).	Noted. SCC have responded to TT.2.0 in our response to [REP7-055].
SCC supports the Police having voting rights within the TRG, as per SCC's response to TT.1.23 at Deadline 5 [REP5-172]	It has been agreed that Suffolk Constabulary will be a member of the TRG and will have voting rights. SZC Co. will have 4 members of the TRG in order to maintain the proposed balance.	SCC welcomes the inclusion of Suffolk Constabulary on the TRG. SCC's position on TRG voting has been set out in our [post-hearing submission on ISH14] and other places within this document.
The comment that LGV trips are generally not new trips on the network only applies to those LGVs dropping off items at the postal consolidation facility in the southern park and ride, not any LGV trips to the main site or AD sites. The justification of not tracking LGVs is based on the route choice assumed in the traffic modelling and no mechanism is provided to manage changes in the routing and potential impacts on the local highway network. SCC is also concerned that if LGVs are allowed into the main construction site rather than the main park and ride there will be no control on their numbers. It is requested that SZC Co. confirms if LGVs will be permitted to enter the main site for work purposes and if so what quantity of vehicles does this involve. Being mindful of the comments about the reasonableness of any	Chapter 6 of the Construction Traffic Management Plan [REP2-054] describes the measures proposed to manage and monitor LGV traffic through the Delivery Management System (DMS). SZC Co.'s response to ExQ1 TT.1.25(iii) describes the measures proposed to manage LGV movements through the DMS. Appendix 7D of the Consolidated Transport Assessment [REP2-046] describes an assessment of LGV movements to/from the main development site. The technical note also includes comparison of LGV movements at Hinkley Point C as a comparator for Sizewell C LGV movements. The work concluded that the LGV demand assumed in the Sizewell C assessment is reasonable and robust. There may be some workers that use LGVs rather than cars travelling to the MDS, but these would fall under the Construction Worker Travel Plan (CTWP)[REP2-055] and would need	SCC understands that inclusion of monitoring of number of LGV movements will be included within the CTMP and CWTP and that the TRG will be able to undertake a review of routeing in the event of exceedance. SCC would encourage inclusion of the differentiation between the two types of LGV user within the CTMP i.e. those used by workers to get to / from site and using the one site car park and those who require use of an LGV within the main site. SCC will review the management measures for LGVs following submission of the updated management plans.

control measures, SCC would consider a monitoring total LGV numbers travelling to and from the site against a programme related profile and maximum number would, together with the TRGs ability to invoke tracking proposed in 1.2.30 would be appropriate.	to qualify for a parking permit at the MDS as set out in the CTWP [REP2-054]. LGV movements not undertaken by workers would fall under the Construction Traffic Management Plan (CTMP) [REP2-054] and would be booked into the DMS and monitoring data provided to the TRG.	
SCC would welcome submission of a Framework Operational Travel Plan as per our ISH3 Post Hearing Submission [REP5-174]. This would be beneficial as it could set out the process of review of the Travel Plan. There are a number of differences between the transport options available to workers during construction and in the operational phase. An outline operational travel plan would enable good behaviour to be embedded in workers behaviour at an early stage. SCC's view is that the operational travel plan is a useful tool to manage workers choice of transport modes during outages to reduce dependence on car travel and hence the requirement for excessive temporary parking areas. SZC Co. is correct that SCC only ask for a workplace travel plan to be submitted to SCC for the first five years. However, there is nothing to prevent a travel plan being extended and a voluntary extension of the travel plan is recommended for such a significant project. SCC Guidance:	As stated in the Written submissions responding to actions arising from ISH3 [REP5-115], SZC Co. will prepare an outline Operational Travel Plan (OTP) to be discussed with SCC and submitted to the examination at Deadline 8.	SCC welcomes this commitment; however, maintains our position that a commitment to extending the five-year life of the plan as set out in our response to 1.2.46 at Table 5 and paragraph 1.8.1 of Table 9 in our Deadline 6 Response [REP6-049]. SCC maintains that the change from the CWTP to the Operational Travel Plan needs to be considered in detail as much of the infrastructure in the CWTP will not be present after construction is complete. The Operational Travel Plan should be available at an appropriate time to embed good travel behaviour reflecting the differing conditions prevalent during the construction phase and the operational phase (ie removal of P&R sites, site accommodation, local buses).

The Owner covenants to submit to the County Council on an annual basis on the anniversary of the date that the Full Workplace Travel Plan is first implemented the Full Workplace Travel Plan Monitoring Report until the anniversary of the date that the Full Workplace Travel Plan was first implemented which falls after the fifth (5th) anniversary of the date of Occupation of the final Commercial Unit forming part of the Commercial Development.		
SCC and SZC Co. have been working together to resolve our concerns regarding the ES, and this has included updates that should address many of our concerns; however, we are awaiting further information on elements of the assessment and completion of the updated workstream. Therefore, we cannot say that the process is fully agreed at this point.	SCC's comment is understood to be primarily related to the on-going discussions to agree the transport effects within the Environmental Statement [APP-198] and Environmental Statement Addendum [AS-181]. SZC Co. has been working closely with SCC to agree the methodology and results. The revised assessment is to be included in the Fourth ES Addendum (Doc Ref. 6.18), which is to be submitted to the examination at Deadline 7.	SZC Co.'s understanding of this comment is correct. The Council notes submission of the document and has responded separately in our Response to [REP7-030]. SCC seeks clarification on what in terms of the ES will be included in Schedule 22 Certified documents. The current version of the dDCO REP7-006 refs to version 01 document reference 6.1 to 6.3.
SCC have not yet received proposals of mitigation along the B1125 beyond a number of concepts and inclusion as a 'headline' item in the Deed of Obligation.	SZC Co. is continuing to develop concept proposals for mitigation on the B1125 and based on recent discussions with SCC it is envisaged that a preliminary concept can be agreed prior to the end of the Examination and included as part of the finalised Deed of Obligation. The design would need to go through further refinement,	SCC understands the applicant is developing a programme of mitigation measures for the B1125 'corridor' between Blythburgh and the B1122 west of Theberton. The Applicant has shared some initial proposals for Westleton and SCC has responded

	public consultation and technical approval by SCC prior to the delivery of the scheme.	with its comments. SCC has not yet been made aware of proposed mitigation on other sections of the B1125 but would welcome involvement in this process.
SCC note there is still disagreement between SZC Co. and the authority regarding the provision of safe pedestrian facilities between the northern end of BW19 and Eastbridge.	SZC Co. has provided further information within SZC Co.'s. Response to the Local Impact Report [REP3-045] and within the Deadline 3 Submission - 9.30 Comments on Responses to Examining Authority's First Written Questions (ExQ1) - Volume 1 - SZC Co. Responses - Revision 1.0 [REP3-046]	SCC believes the lack of an off-road continuation from the northern terminus of BR19 to Eastbridge adjacent to Eastbridge Road is of great concern. The creation of an off-road link is covered in the PRoW Fund secured in the Deed of Obligation, but this would rely on Highways Act powers where an objected order is determined by the Secretary of State and thus not secure.

SCC RESPONSE TO [REP7-061] SECTION 2.21.11 OF COMMENTS AT DEADLINE 7 ON SUBMISSIONS FROM EARLIER DEADLINES AND SUBSEQUENT WRITTEN SUBMISSIONS TO ISH1-ISH6

Given the tabular format of Section 2.21.11 of REP7-061, and as set out above, it has been responded to separately in the following Table.

SCC Key Areas of Concerns as Summarise at Deadline 5	SZC Co statement in [REP7-061]	SCC Deadline 8 response
The profile provided indicates that the proposed peak HGV movements would only be predicted to be exceeded once with 300 HGVs only exceeded during a few weeks. Whilst recognising that the figures are indicative, SCC would query why the peak HGV movement cap cannot be reduced to 600 HGV movements to reflect these profiles through good management with the DMS, as the number of exceedances does not appear particularly different to the early years?	The purpose of the HGV profile was to show the 'unfettered' profile without additional management of the DMS to ensure that the HGV movements remain within the proposed caps. The unfettered HGV profile shows limited exceedances, which could be managed within the spare capacity around those exceedances in the profile. Notwithstanding this, a 'smoothed' out HGV profile has been provided in response to ISH8 Written Submissions responding to Actions (Doc Ref. 9.83).	SCC accepts that the DMS may smooth out the profile, however, the point SCC was attempting to make was that, given the limited 'forecast breaches' that would need to be 'smoothed out' whether any potential existed for reducing the HDV cap. The Applicant's ISH8 Written Submissions [REP7-071] appears to show limited opportunity for reducing the Early Years cap; it is noted that this now includes the HDVs associated with the Desalination plant, which were not previously included in the profile. There does however appear to be reasonable opportunity to reduce the peak construction peak daily cap and this should be considered throughout the construction programme by the TRG.

While sourcing fill from the TVBP and SLR reduces the need for trips from further afield it still generates a significant number of movements along the B1122 corridor. The proposal for a haul road is welcome but SCC is concerned regarding the phasing of this, in particular the bridge across the East Suffolk Line. SZC Co. is requested to confirm that this material is included within the 12.1 million tonnes estimated in the materials strategy (AS-280).	The 12.1M t of material referred to in Table 2.1 of the FMS [AS-280] is the material import for the project and excludes the mass balance of material between the main site and the TVBP and SLR. The detailed phasing of the East Suffolk Line overbridge and the SLR / TVBP as well as the vehicles movements are provided in response to ExQ2 TT.2.14 (Doc. Ref. 9.71), and the response to REP5-058. Please also refer to the section of this report entitled 'Sizewell Link Road Description of Development'.	If the material imported from the TVB and SLR to the main site is excluded from the 12.1 million tonnes of material imported for the project, can the applicant confirm whether the import of fill from the SLR and TVBP is included within the calculation of the modal split presented in the materials strategy (AS-280)? Will this not significantly increase the HGV movements in proportion to rail and marine over the whole project? The response to TT.2.14 (REP7-055) states that on the section of the B1122 between the SLR site access (at a point unknown at this time) and the main development site (unclear if this is the main site entrance or the secondary site entrance on Lovers Lane) will experience 20-30 HGVs additional to the 600 HGV movements assessed and for a short period (5 months) this could increase to an additional 100-200 movements. This is dismissed as not having any impacts as there are no sensitive receptors on this section of the B1122. SCC notes that this section forms part of the public highway open to use, is crossed by a number of public rights of way and has two dwellings, Theberton House @165m north of the B11122 and Theberton

		Grange @270m south of the B1122. If the fill is being hauled to the secondary site entrance that would impact Abbey Road and part of Lovers Lane where sensitive receptors have been identified.

SCC RESPONSE TO [REP7-071] SZC CO. WRITTEN SUBMISSIONS RESPONDING TO ACTIONS ARISING FROM ISH8

Ref	SZC Co statement in [REP7-071]	SCC Deadline 8 response
1.9.2	In response to a request by the ExA in ISH8, the HGV profile has been smoothed to inform the mitigated HGV movements, which takes account of the management and controls proposed in the CTMP [REP2-054]. The 'smoothed' profile is provided below. It should also be noted that the 'smoothed' HGV profile includes the forecast water tankers associated with the proposed temporary desalination plant. In addition, it also includes bus movements along the B1122 routing between the northern and southern park and ride facilities and the main development site during the short period between the park and ride facilities being operational and prior to the Sizewell link road being operational. 130 two-way bus movements per day have been included within the profile, which is 25% of the peak park and ride bus movements to align with the forecast workforce during that time.	SCC welcomes the provision of this profile and it is noted that the profile shows limited opportunity for reducing the Early Years cap; however, this includes the HGVs associated with the Desalination plant which were not previously included and would add additional pressure to managing HDVs in the Early Years. It is also noted that Table 3-1 of [REP7-036] indicates an increase of 10 'truck' movements in October 2022, which increases to 60 by April 2023 and then to 74 movements from September 2023 to January 2024. It is understood that the profile also includes HGV movements to and from the SLR along the B1122 but can the Applicant confirm this as the response to TT.2.14 (REP7-055) suggests otherwise. The profile does continue to demonstrate some potential for reducing the peak construction HGV cap with good management; to potentially the 600 HGVs modelled in the Early Years, or that the peak cap could potentially be reduced to 500 HGV movements after Year 5 of the project. SCC would encourage all opportunities to reduce impacts to be investigated.
1.9.3	The proposed delivery management system will allocate individual daily delivery slots for each HGV up to the	SCC continues to support the proposed management system in general. As set out above, the potential for reducing the

	approved limits, thus ensuring that daily movements do not exceed the agreed caps. This will require the advanced import and on-site storage of some deliveries prior to the forecast peaks (when movements would otherwise exceed the caps) to reduce and spread the period and flatten the profile. It should also be noted that this forecast shows the peak expected daily movements each week and it is therefore not expected that this level of movement will be sustained throughout the working week. It is likely that there will be further 'natural' smoothing of the profile as the work progresses due to the resource levelling of the programme and progress on site, which would result in a smoother profile compared to the forecast profile.	HDV cap should be considered throughout the life of the project; this is particularly with regard to the residual capacity below the peak HDV cap during construction, based on the presented profile of movements being the peak of each week and therefore that there will be some additional capacity on the remaining weekdays. This is indicated by Appendix 6A of [REP7-057] which indicates broadly a ratio of the weekly peak day being 3.5 times the weekly average day, therefore even during week 199 which has the busiest forecast 'peak construction' day of 380 HGVs, which SCC appreciate will be smoothed down to below the cap using the DMS, there are approximately 1,332 HGV weekly movements forecast; this means of a total cap of 4,000 HGVs weekly HDVs, the Applicant is using approximately one third of that total capacity during that week and so SCC are of the opinion that there is reasonable potential to look to reduce the cap through management.
1.15.13	For the main development site permanent car park, at least 20% of car parking spaces will have active electric vehicle charging, with a further 20% capacity for passive provision. The demand for the permanent development site electric vehicle charging shall be reviewed in line with the Operational Travel Plan.	SCC sets out our position on Electric Vehicle charging in our response to AQ.2.1 at [REP7-163] and that subject to approval of details in writing this level of provision is acceptable for the main development site.
1.15.14	During the construction phase, temporary car parking on the main development site, the northern park and ride and the southern park and ride sites will have capacity for up to 40% to be provided, with an initial 5% active electric vehicle charging provided on first occupation. The CWTP is being updated to provide for monitoring of the use of the electric	SCC is content on the principle of the proposed provision and review of occupancy subject to an understanding of the length of time it would take to install new infrastructure and an understanding of the frequency of surveys. It is important that a lack of provision does not lead to disincentivising uptake of

	charging points by the transport co-ordinator, which would be reported to the Transport Review Group (TRG) in the quarterly transport monitoring reports. Based on the monitoring the TRG can then direct SZC Co. to convert passive to active spaces. Based on discussions with SCC since ISH8 a trigger of 80% utilisation of the active vehicle charging spaces is proposed for the conversion of further passive spaces to active, which will be incorporated into the updated CWTP.	electric vehicles and so a reasonable buffer in provision to ensure the workers always have confidence in the ability to charge their car is maintained. This is particularly important for the park and rides as there would be little opportunity for a management process to be put in place where electric cars could be moved once they had fully charged, which can occur at offices etc. It is also important that any time necessary for procurement and implementation is included within the review so that the charging points are available at the appropriate time.

SCC RESPONSE TO [REP7-050] SZC CO. RESPONSE TO EXQ2 VOLUME 1 PART 1

Ref	SZC Co statement in [REP7-050]	SCC Deadline 8 response
AL.2 Alternatives		
AL.2.0	Part ii) – the securing mechanism is the limit on HGV numbers enforceable through the **CTMP**. That limit cannot be met without the anticipated contribution from both rail and marine transport. This is explained further in Appendix A to **Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021)** [REP5-114] (Material Imports and Modal Split), which demonstrates that rail and road capacity cannot meet the materials requirements. That approach is considered appropriate to meet the requirement in NPS EN-1 to prefer sustainable transport modes whilst retaining some limited flexibility between those modes to respond to opportunities in the procurement of materials. **SCC has suggested [REP6-049] at electronic page 8 that** *"SCC accepts that there are practical reasons why greater use of marine could not be made into a 'hard control' but sees no reason why the FMS should not commit to maximising the use of marine where practicable."* SZC Co. would be pleased to explore that issue further with SCC and through the examination	SCC welcomes the Applicant's commitment, and welcomes further discussion. SCC considers that there should be an aspiration to maximise transporting materials by sea and rail, whilst taking into consideration the wider issues that the Applicant has identified including environmental, and feasibility. As set out in our Response [REP7-163] to EXQ2 AL.2.0, SCC accepts that is would be 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 where possible paying due regard to relevant considerations and impacts. SCC welcomes the Applicant's commitment to monitor and report the modal split of construction materials. SCC does not seek to control the process. We consider that regular reporting of the modal split, and any opportunities that were identified or investigated, to the TRG would be a reasonable approach which would not unduly constrain the delivery of the project. This would allow the TRG to

	more generally. There are, however, some points to be made at this stage, including: - none of the freight transport options are without impact. The ExA for example, has rightly examined the impact of vessel movements. Night time trains have effects, as do HGV movements; - with the SLR and two village bypass in place, it is not necessarily obvious that maximising marine movements would always be the right solution; - as SZC co. explained at ISH1, it is important to retain some practical and competitive tension between procurement options in order to optimise the efficient project delivery and maintain options for instance over the quality, guaranteed availability and price of materials. Were it to be agreed that an objective to maximise marine transport was appropriate, it would then be necessary to understand how that objective would operate and whether SCC or others wished to have control over how it was exercised.	monitor and consider whether opportunities should be further pursued. SCC agrees that all transport modes have impacts but the key to the success of the project in terms of a sustainable freight strategy is to minimise the overall impact. Consistent with NPS EN-1, SCC considers this is achieved by maximising marine and then rail transport. While it is accepted that SZC Co has made great efforts to propose mitigation on the highway network including two significant bypasses and other substantial works, it remains a fact that the mitigation does not resolve all impacts at all locations. It is acknowledged that, subject to completion of the ES workstream, the mitigation does address those locations where significant impacts were identified. Many of SCC's concerns are regarding the timely delivery of the mitigation particularly those not secured within the DCO (i.e. ESL level crossing improvements and ESL rail noise mitigation) and the appropriateness of 'reasonable endeavours' to secure delivery of those measures within the DCO. (vi) In appendix A of Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021) [REP5-114]) the theoretical capacity of the MBIF between April and October is stated as 1,400,000 tonnes with a minimum requirement of 700,000 tonnes i.e. 50%.

	Part (iii) – the up to date position on delivering train capacity is set out in the second Statement of Common Ground with Network Rail [REP5-095]. The parties are working to a programme to deliver 2 trains per day by October 2023 and 4 trains per day from March 2024. The Material Imports and Modal Split paper submitted at Deadline 5 (Appendix A to **Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021)** [REP5-114]) explains that the Marine Bulk Importation Facility is planned to be operational from Q2 2025. Part (iv) - multiple measures are proposed to monitor and control the mitigation of adverse effects arising from the transport strategy. These include: - The **Coastal Processes Monitoring and Mitigation Plan (CPMMP)** submitted in draft at [REP5-059] - Monitoring of dust impacts through the provisions of the **CoCP** (Doc Ref. 8.11 (D)); - Monitoring of rail and road noise through the **Noise Monitoring and Mitigation Scheme** secured by the CoCP (Doc Ref. 8.11 (D)), along with the **Noise Mitigation Scheme** (Doc Ref. 6.3 11H(C)); - Monitoring of transport effects through the **CTMP** (Doc Ref. 8.7(B)) and **CWTP** (Doc Ref. 8.8(B)) enforced through the provisions of	In the D7 response 765,000 tonnes is quoted as the 'reliable annual capacity' being 60% of the theoretical capacity (but is in fact 55%). If as stated 87% of this reliable annual capacity (665,550 tonnes) is available in the first two years of operation this would equate to 67.5% of the theoretical capacity. While we consider that SCC does not have access to the details of the data available to SZC Co. and does not dispute its figures it does appear that there may be spare capacity within the marine deliveries if it were practical, and consider that reporting process on the identification and use of this capacity is a reasonable approach.

	Schedule 16 of the **draft Deed of Obligation** (Doc Ref. 8.17(F)) Part (v) With reference to LIR [REP3-044] item 15.7.15, there are no plans to import materials via the Permanent BLF, this is solely used for the import of AIL. There is no need to import AILs during the winter period as the AIL schedule allows for AILs to be imported to site in the season prior to their requirement and stored on site until required. There is, therefore, not change to the model split during this period. The The MBIF's main period of utilisation is during the Phase 2 Bulk earthworks for the import of backfill, the required quantity of backfill is split between marine import during the summer and year-round rail imports. The proportions of marine and rail import of fill is shown in Figure 5 – Rail and Marine import of permanent works backfill, of **the Material Imports and Modal Split paper, Appendix A [REP5-114]**. The import profiles and onsite stockpiling of material has been developed so that no additional road import of fill materials is required in the winter period when the MBIF in not in operation. Notwithstanding the above and referring only to latter part of the question, for year 5, in which deliveries are typical of all the construction phase years, 1,9473 deliveries are made by road in 5 winter months out of an annual total of 46,807 deliveries, which is 42%.	

	Part (vi) For the temporary marine bulk import facility (MBIF) there is a reliable annual capability to receive 765,000 tons of material annually (assuming an appropriately graded and semi dry material). This reliable annual capacity is 60% of the facility's theoretical maximum annual capacity and has been adopted following allowance being made based on operational experience at HPC, the exposed North Sea location and the efficiency of end-to-end logistics operations. The MBIF is available for imports from 2025 and its utilisation in the first two years is 87% of this reliable maximum capacity.	
AL.2.5	Detailed discussions on mitigation which will address the effects on the setting of Leiston Abbey are progressing very well and SZC Co. and EHT are close to agreeing the specific amounts and measures to be included in the Draft Deed of Obligation. The Draft Deed of Obligation submitted at Deadline 7 (Doc Ref. 8.17(F)) has been updated to reflect the progress that has been made since the response to the Examining Authority's First Written Questions. SZC Co. has provided clarification to EHT and Historic England on how their existing legal right of access to Leiston Abbey from the B1122 will be maintained. The need to provide improvements to the junction of this access	SCC notes these comments regarding the protection of the existing right of access to Leiston Abbey. Any changes to the access will be subject to road safety audits and the authority would not accept any reduction in key design and safety criteria such as visibility.

	with the B1122 to ensure safe access to Leiston Abbey (second site) will be considered at the detailed design stage: Requirement 6A [REP6-006] requires SZC Co. to submit a right of way implementation plan to Suffolk County Council for their approval in their capacity as Highway Authority. This must be in general accordance with the Public Rights of Way Strategy [REP3-013] which includes the need "to minimise road crossing points and, where unavoidable, to carry out relevant road safety audits and implement recommendations to ensure user safety". Therefore safety of both motorised and non-motorised users will need to be considered and any appropriate safety measures incorporated in order to discharge the requirement.	
AQ.2 Air Quality		
AQ.2.0	SZC Co. is committed to provide electric vehicle charging bays. For the main development site permanent car park, at least 20% of car parking spaces will have active electric vehicle charging, with a further 20% capacity for passive provision. The demand for the permanent development site electric vehicle charging shall be reviewed in line with the Operational Travel Plan. During the construction phase, temporary car parking on the main development site, the northern park and ride and the southern park and ride sites will have	SCC sets out our position on Electric Vehicle charging in our response to AQ.2.1 at [REP7-163] and that subject to approval of details in writing this level of provision is acceptable for the main development site. SCC is content on the proposed provision at temporary car parking sites and review of occupancy subject to an understanding of the length of time it would take to install new infrastructure and an understanding of the frequency of data collection that triggers action. It is important that delays in installing additional charging points does not

	capacity for up to 40% to be provided, with an initial 5% active electric vehicle charging provided on first occupation. The CWTP is being updated to provide for monitoring of the use of the electric charging points by the transport co-ordinator, which would be reported to the Transport Review Group (TRG) in the quarterly transport monitoring reports. Based on the monitoring the TRG can then direct SZC Co. to convert passive to active spaces. Based on discussions with SCC since ISH8 a trigger of 80% utilisation of the active vehicle charging spaces is proposed for the conversion of further passive spaces to active, which will be incorporated into the updated CWTP. The Associated Development Design Principles have been updated at Deadline 7 to reflect the commitments for electric vehicle charging points.	create a lack of provision leading to disincentivising the uptake of electric vehicles. SCC is awaiting submission of the updated CWTP before commenting further on the proposals for managing electric vehicle car parking.
AR.2 Amenity and recreation		
Part 1 of 6 AR.2.0	**(ii)** The Access and Rights of Way Plans submitted at Deadline 2 [REP2-007] have been superseded by the Access and Rights of Way Plans Revision 6 [REP5-008] submitted at Deadline 5. The Access and Rights of Way Plans Revision 6 [REP5-008] are submitted 'For Approval' and therefore take precedence over the plans in the Rights of Way Access Strategy [REP3-013]. The Access and Rights of Way Plans Revision 6 [REP5-008] only show definitive Public Rights of Way and Highways. The plans in the Rights of Way Access Strategy [REP3-013] show definitive Public Rights of Way, and also show other recreational routes such as	(ii) SCC notes these comments but emphasises that the Access and Rights of Way Plans must accord to the schedules in the dDCO. (iii) SCC seeks the alignment of the FP21 (the coast path) on top of the hard coastal defence feature, being in its opinion, as the responsible highway authority, the most resilient route, and the one offering the best all round views and user experience, especially in the operational phase. The enjoyment of a PRoW is a consideration for proposed diversions when made under the Highways Act 1980.

	long distance walking routes, cycle routes and permissive footpaths, and accessible landscapes such as Open Access land and Common Land, but do not show Highways. (iii) The coastal path is a natural feature intended to replicate the existing. It is also adjacent to the soft coast defence feature and will be maintained as a part of this. The numerical modelling indicates that the soft coast defence would not be eroded back to the path under even extreme storm conditions. Maintenance of the soft coast defence feature will include regrading of the design profile to the lines and levels shown within the application, and this will include the coastal path, if required. (iv) The Rights of Way and Access Strategy submitted at Deadline 3 [REP3-013] is the same as the revised Rights of Way and Access Strategy submitted at Deadline 2 [REP2-035], but with plans (Figures) included which were inadvertently omitted from the document submitted at Deadline 2. SCC has made further comments on the Rights of Way and Access Strategy in their Written Response at Deadline 3 [REP3-079] (paragraphs 44 to 49) and Deadline 5 [REP5-172] (paragraphs 49 to 59). The Rights of Way and Access Strategy has been reviewed in light of SCC's comments submitted at Deadlines 3 and 5, and an updated revision is submitted at Deadline 7 (Doc Ref. 6.3 15l(C)).	In effect, SCC seeks the switch of FP21 from the seaward side of the coastal defence (as proposed by the Applicant) to the top, and the informal route from the defence top to the lower seaward route, The informal route at the lower level would provide an alternative to users not wanting to see the Sizewell A, B and C sites. No cogent explanation why FP21 and the coast path *cannot* be aligned on top of the defence has been put forward by the Applicant, including in its oral submissions at ISH12. SCC will work with the Applicant at the detailed design stage, with the primary objective of engineering a path on top of the hard coastal defence feature which meets the County Council's requirements for surface and width, and ties in with onward PRoW. SCC expects SZC Co. to use its best endeavours to work with the County Council on designing a route on top of the defence. (iv) SCC has made further comments on the ROW & Access Strategy at 2.12 above.

AR.2.1 box 1	(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. (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.	The FIP has been renamed the Public Rights of Way Improvement Plan and SCC is satisfied in inclusion in Schedule 2 6A of the Draft DCO resolves earlier concerns.
AR.2.1 box 2	Schedule 2, Requirement 6A has now been included in the Draft DCO, the latest draft of which is submitted at Deadline 7 (Doc Ref. 3.1(G)), which requires a Public Rights of Way implementation plan to be submitted and approved by SCC before any new or diverted public right of way listed in Schedule 11 may be commenced. This provides SCC with appropriate control over the timing, details and delivery of the PRoW diversions within the main development site. It is understood that SCC are content with this approach.	SCC is content that this resolves the matters raised in previous submissions including AR1.7 and provides and acceptable level of control for the authority.

SCC RESPONSE TO [REP7-052] SZC CO. RESPONSE TO EXQ2 VOLUME 1 PART 3

Ref	SZC Co statement in [REP7-052]	SCC Deadline 8 response
CA.2 Compulsory Acquisition		
CA.2.10	(a) SZC Co. proposes to retain the Sizewell link road for the reasons set out in SZC Co.'s response to ExQ1 AI.1.32 and ExQ1 AI.1.33 [REP2-100] (electronic pages 196 – 201) and at electronic pages 240 – 243 of the Sizewell link road Response Paper [REP2-108]. Retaining the Sizewell link road would result in benefits, including: • Permanent reduction in traffic for communities along the B1122. SCC commissioned a report in December 2014 (referred to as the 'Sizewell C, Route D2 and B1122 Study'[1]) to provide a high level assessment of options for providing relief to communities along the B1122. Page 254 of the study stressed the need for a bypass, both in the construction and in the operational phase by stating "If the bypasses were not constructed, the number of HGVs on the existing B1122 both during and after the Sizewell C construction period would be unacceptable." (paragraph 2.1.20 of Appendix 5D [REP2-108]). • The B1122 is substandard for the traffic that it currently carries – particularly in relation to forward visibility, carriageway width and its lack of amenity for cyclists and pedestrians. That analysis, together with	SCC continues to consider that, for the reasons set out in its Written Representations [REP2-189], the environmental and cost implications of the retention of the SLR outweigh the benefits once the construction phase of SZC is completed. It is noted that there will be short term impacts while the road is removed, but this would need to be weighed against the continuation of the disbenefits in perpetuity if the road was retained. These short-term impacts can be minimised by the necessary truck movements referred to in SZC Co's Response to CA2.10 (REP7-052) being routed along the route of the SLR, either on the existing road bed, or for those places where it has already been removed, using a haul route mirroring the process used during construction. It is anticipated that it would be a similar process to that already proposed by the Applicant for the removal of the linear infrastructure of the Green Rail Route. The issue raised about the removal of the SUDS and the impact on biodiversity can be resolved by not relying on these features for ecological mitigation, using measures such as district licencing to seek mitigation elsewhere and to ensure that through approaches including "newt fencing", not encouraging the establishment of significant populations at these locations.

[1] https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/141211-Sizewell-Study-REVH-final.pdf

	the amenity effects of its operation on the communities that front the road is set out in Section 2.1 of Appendix 5D, the 'Sizewell Link Road – Principle and Route Selection Response Paper' [REP2-108]. • Table 8.9 of the consolidated TA [REP4-005] provides information on the traffic levels during the operational phase of Sizewell C. This shows that there would be a 94% reduction in traffic on the B1122 Theberton during operation should the Sizewell link road be in place (there would be 7,000 daily AAWT traffic flows in 2034 without the Sizewell link road but 400 with the Sizewell link road in place) • Sustained improvements in noise and air quality would be achieved, particularly in Theberton from the permanent reduction in traffic along the B1122 (Table 2.2 of Appendix 5D in REP2-108 confirms the effects on the B1122 and local communities with and without a Sizewell link road. Paragraph 2.1.100 of Appendix 5D in REP2-108 states that "*by 2034, when construction traffic is no longer present, there would be either a negligible effect or beneficial [noise] effects as a result of the Sizewell link road for the majority of receptors, with only one receptor recording significant major adverse noise effects on a typical day*". Paragraph 2.1.128 of Appendix 5D [REP2-108] states "*Retaining the Sizewell link road offers permanent benefits, particularly in relation to the Theberton element of the bypass, including sustained improvements in noise and air quality in the village.*	

	The Councils summarised these benefits in their joint response to the Stage 4 consultation. Paragraph 246 of the Councils' response states: "The Councils consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction." • The opening and retention of the Sizewell link road would enable the existing B1122 to be re-purposed in response to dramatically reduced traffic levels. Lower traffic volumes on the B1122 would result in the route becoming more popular among cyclists and would contribute substantially to enhanced cyclist connectivity in the area (para 5.4.42 of Consolidated TA [REP2-045]). This would be directly consistent with the East Suffolk Council Quiet Lanes initiative. This initiative seeks to maintain the existing tranquillity of a suitable rural road and encourage the use of it through active and sustainable means such as walking, cycling, and horse riding. SZC Co. is working with the local authorities to contribute funds to achieve the repurposing of the road and to develop a cycle network that would maximise the use of the quieter roads, creating recreational routes that link up with local destinations. • ESC rightly identify this opportunity as "*hugely significant*" [REP3-060] at paragraph 2.11 onwards.	

	• The proposed Sizewell link road offers long term benefit to Yoxford. As the design of the Sizewell link road includes a link off the A12 south of Yoxford and the Middleton Moor link, it allows traffic from both the north and south travelling to Sizewell to avoid needing to pass through Yoxford. • The environmental harm that would be caused by removing the road would be avoided (further details about his harm are provided below). SZC Co. consulted on the option of a temporary Sizewell link road at Stage 4 pre-application consultation. 161 responses were received to the question on its removal, of which, 41 responses gave a view on whether the Sizewell link road should be removed and land restored. 68% opposed the removal of the Sizewell link road. This is set out in SZC Co.'s response to ExQ1 AI.1.32 [REP2-100] (electronic pages 197). Middleton- cum-Fordley Parish Council conducted a survey of their own in May 2021 and survey results were obtained from 138 individuals [REP5-242]. The survey found that, should the Sizewell link road be delivered on its proposed route, 61% considered it should be permanent (Question 4, 80% response rate). Removing the Sizewell link road would result in a significant amount of construction work and environmental damage. The impacts of the removal of the Sizewell link road are set out in SZC Co.'s response to ExQ1 AI.1.32 and ExQ1 AI.1.33 [REP2-100] (electronic page 192); at electronic pages 240 – 243 of Appendix 5D of the Sizewell link road	

	Response Paper [REP2-108] (submitted at Deadline 2); and at electronic page 149 of **SZC Co.'s Comments on the Councils' LIR** [REP3-044]. The Sizewell link road would need to be built to a high standard and this was recognised and accepted by SCC at the Issue Specific Hearing. With a 10-12 year overall construction period, and given the scale and nature of traffic involved, it is misconceived to think the Sizewell link road could be built as some form of temporary haul road. If the Sizewell link road was made temporary, the removal works would include: • Removal of the Sizewell link road itself, pavements, road drainage networks, utilities (e.g. cables, overhead lines) and the Pretty Road Overbridge. • Reinstating parts of the A12 and B1122, including: removal of A12 Western Roundabout and reinstating the existing A12 alignment; removal of Middleton Moor roundabout; and reinstatement of the existing B1122 alignment. • Removal of the Sizewell link road tie-in to the B1122 at the eastern end of the Sizewell link road and reinstatement of the existing B1122 alignment. The preliminary environmental information provided as part of the Stage 4 Consultation Document [APP-082] stated that "During the breaking of surfaced areas and removal of the road and associated infrastructure, there is the potential for significant adverse noise and vibration effects on nearby residential properties, as well as on the amenity of users of PRoWs and the setting of Theberton Hall".	

	These activities would result in a significant amount of construction traffic. To construct the Sizewell link road, a large amount of material is proposed to be moved to the main development site. If the Sizewell link road was temporary, this material would have to be transported back to the Sizewell link road site to reinstate the land. It is estimated that to move just this material from the main development site to the Sizewell link road site to reinstate the land would require 10,556 one way truck movements alone. This would be in addition to other construction traffic movements that would be needed for other works, including drainage and landscaping. At the Stage 4 consultation, ESC raised concerns about the potential environmental impact of the removal of the road. In particular, the removal of the SuDS that serve the Sizewell link road could have a negative impact on the biodiversity that would have established in the SuDS from the time they were constructed. Given the benefits of retaining the Sizewell link road and the drawbacks of removing it following construction of Sizewell C, there are clear and compelling benefits in its retention and justification for the permanent acquisition of this land. (i) Based on the existing numbers for Sizewell B outage traffic, it is expected that an outage at Sizewell C, would result in approximately 700 vehicles per day (630 cars, 63 LGVs, 3 HGVs). A planned outage occurs approximately every 18 months and lasts approximately 6 weeks. With Sizewell C the number of planned outages would triple.	

	The Sizewell link road would act as a dedicated promoted route from the A12 to the site to facilitate movement of workers (and their cars) to the main development site with less disruption to residents of the B1122 and through Leiston. The road would also serve Sizewell A and B, the Sizewell community (including the beach) and provide convenient access to parts of Leiston. HGVs and AILs would be required to route via the Sizewell link road, even during operation, which would ensure that any HGVs and AILs would not travel through the villages of Yoxford, Theberton and Middleton Moor. SZC Co. would ensure that HGVs and AILS route onto the Sizewell link road in the operation phase through the Operational Travel Plan, which is to be secured via the **Deed of Obligation** [REP5-082]. This is set out in SZC Co.'s response to ExQ1 AI.1.33 [REP2-100] (electronic page 199) and at electronic pages 240 – 243 of the Sizewell link road Response Paper [REP2-108]. With the benefit of the Sizewell link road, it is anticipated that signage would ensure that all but immediately local traffic would use the link road. (iii) The significant legacy benefits of the Sizewell Link Road are set out within the response to part *i* of CA.2.10 above.	
CA.2.14	(i) SZC Co. are not negotiating protective provisions in relation to highways with SCC. Our position, as we have always made clear to SCC, is that protective provisions for	(i) SCC accepts the alterations made by the applicant to article 21. Subject to this and satisfactory resolution of some minor issues relating to highway maintenance contained

	highways are unnecessary. Most DCOs (and other 'Works Orders' such as TWA Orders or hybrid Acts) require works to highways, and yet very few have sought to include 'protective provisions' for existing highways. We are not aware that absence of such provisions has caused any difficulties, and certainly has not at Hinkley Point C. The Highway Act 1980 protects existing highways from interference without 'lawful excuse' by persons other than the highway authority. Ordinarily, such interference is therefore authorised by a s278 agreement entered into by a developer wishing to carry out works to an existing highway or to create a new highway which will connect into an existing highway. The dedication of the new highway would ordinarily be dealt with via a s38 agreement, again made under the Highways Act 1980. The position is slightly different with a DCO, in that a DCO provides the undertaker with statutory authority to carry out the authorised works (including works which interfere with an existing highway), and therefore the DCO itself in principle authorises the entry onto the highway without the need for a lawful excuse in the form of a s278 agreement. For this reason, however, DCOs generally provide an express power for the local highway authority and undertaker to enter into an agreement to s278/38 agreements (under art 21 in the case of the SZC dDCO). We have added a new sub-paragraph to article 21 (art 21(3)) which prevents SZC Co from carrying out any highway works without completing such an agreement with SCC. This therefore places SCC in exactly the same position with regard to their ability to control the terms on which a highway may be interfered with as they would have but for the statutory authority afforded by the	within the Deed of Obligation SCC is prepared to withdraw its proposal for protective powers as the highway authority.

	DCO. SZC Co. consider this to be the simplest and most appropriate means of ensuring SCC has the necessary level of control over works affecting existing highways. For additional clarity, Rev 8 dDCO provides expressly that art 21 agreements may include such matters as might otherwise be included in a s278 or s38 agreement. We have invited SCC to offer further drafting to enhance article 21 should they wish to. (ii) SZC Co. are not currently discussing and are not aware of any Protective Provisions sought by SCC in addition to those referenced above.	
CU 2 Cumulative Impacts		
Cu.2.0	The updated cumulative transport environmental assessment has been provided within the Fourth ES Addendum (Doc Ref. 6.18) submitted at Deadline 7. The revised assessment addresses all of SCC's comments. The updated transport effects tables have been shared with SCC prior to Deadline 7 to inform the discussions on transport mitigation, which has now been agreed with SCC and is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)).	The Environmental Statement workstream has been responded to separately in our response to [REP7-030].
Cu.2.1	The package of proposed transport improvements to be delivered by SZC Co. in addition to the works included in the DCO has now been agreed with ESC and SCC and is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)). It has been agreed that the following schemes are to be delivered by SZC Co.: 1. Marlesford and Little Glemham – Pedestrian enhancements, formal pedestrian crossings, village	The list of mitigation schemes has been agreed in principle. A number still require the submission of details to provide comfort to SCC that the proposed mitigation scheme is acceptable. These are the following: 1 Marlesford and Little Glemham, 2 Yoxford Mitigation Schemes and 4. B1078 Road Safety Improvements: While plans are available they have yet to be appended to the Deed of Obligation.

	gateways and speed limits 2. Yoxford – pedestrian crossing 3. B1125 Westleton and Walberswick – village gateways and pedestrian enhancements. 4. B1078 corridor – road safety improvements 5. B1122 early years - Village gateways at Theberton and Middleton Moor, pedestrian enhancements and formal pedestrian crossing in Theberton, road safety improvements. 6. B1122 corridor repurposing – Change in use of B1122 to local access road and cycle / pedestrian route as well as integration and promotion of Quiet Lane scheme. 7. Leiston town centre improvement scheme – environmental and safety mitigation 8. Wickham Market improvement scheme – environmental and safety mitigation The delivery and timing of these schemes has been agreed with SCC and are proposed to be phased to minimise disruption to the highway network and local communities (refer to the draft Deed of Obligation (Doc Ref. 8.17(F) for details of phasing). In addition, a series of transport related contributions have been agreed with SCC and ESC and are set out in the draft Deed of Obligation (Doc Ref. 8.17(F) SZC Co. will continue the close engagement with both the EA1N and EA2 projects to ensure that there is close coordination for the delivery of works in particular where there are proposals for all projects in the same locations, such as at Theberton.	3: B1125 Corridor, 5 B1122 Early Years and B1122 Repurposing. While principles have been discussed, the LHA has not seen any detailed proposals. 7. Leiston Town Centre Improvement and 8. Wickham Market Improvement Schemes. It is understood that the indicative scheme will be based on the details forming part of the ongoing consultations. Although the method of delivery of these schemes has been agreed the timing has not. Not included within this list but forming part of the mitigation is the SZC Signage Strategy and associated implementation plans. The principles and approval process have been agreed with the Applicant but not the timing of the strategy or the implementation. The Applicant and SCC are in regular correspondence, and it is anticipated that agreement will be reached before the end of the examination.

SCC RESPONSE TO [REP7-053] SZC CO. RESPONSE TO EXQ2 VOLUME 1 PART 4

Ref	SZC Co statement in [REP7-053]	SCC Deadline 8 response
HW.2 Health and Wellbeing		
HW.2.0	Please refer to the response to TT.2.27. In addition, the methodology used by SZC Co. for fear and intimidation has been agreed with SCC; this will be set out in the updated version of the Statement of Common Ground with SCC and ESC to be submitted at Deadline 8.	SCC can confirm the methodology has been agreed.
HW.2.1	(i) Please refer to the response to CU.2.1 for details on the agreed local transport schemes that is reflected in the latest draft Deed of Obligation (Doc Ref. 8.17(F)) submitted at Deadline 7. (ii) Refer to (i) that the agreed position on the local schemes is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)) in terms of the scope of the works. It has been agreed that the local schemes will be delivered by SZC Co. and therefore SZC Co. will need to progress the detailed design of the schemes and gain technical approval by SCC as well as enter into a S278 agreement with SCC for SZC Co. to deliver the schemes on the public highway. Agreement has now been reached with SCC with regards to the schemes that will be delivered by SZC Co. and the proposed phasing of these schemes as well as an agreed package of transport contributions that will be made by SZC Co. The agreed position is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)).	(i), (ii) and (iii) SCC understand that details of the agreed local highway schemes will be included as annexes to the Deed of Obligation. Details on the progress to date are in our response to Cu.2.1. The implementation in terms of timing of these schemes is under discussion.

HW.2.3	(i) **Volume 2, Chapter 28** (Health and Wellbeing) of the **ES** [APP-346], does not identify significant impacts on local healthcare services despite taking a conservative approach, assuming no offsetting of demand on local healthcare services due to home-based workers using the "Sizewell Health" occupational health facility. Therefore, the residual healthcare contribution is voluntary, rather than being required to address a significant impact. (…)	SCC welcomes that the Applicant appears to have reached broad agreement with the CCG and Public Health about appropriate levels of healthcare contribution, although we understand that there is still disagreement with regard to a contribution from the Applicant on dentistry services to mitigate impacts from non-home based workers. So whilst we maintain the view as set out in the Local Impact Report [REP1-45] para 27.24, that, notwithstanding the provision of comprehensive on-site occupational health facilities, the Council anticipates the proposal will still have an impact on primary healthcare facilities in and around the area of the development, we will support the CCG's view as to the suitability of levels of mitigation.
HW.2.3	(ii) SZC Co.'s transport modelling does not predict significant journey time delays. Extensive transport mitigation is proposed to avoid journey time delays, including new roads and highway improvements, use of rail and sea transport, support for Suffolk Constabulary for AIL escorting and road safety, transport management plans and the various funds set out in Schedule 16 of the Draft Deed of Obligation (Doc Ref. 8.17(F)). The latter includes a contingent fund which the Transport Review Group will be able to draw down on to address any effects arising during the construction period. This is directed to ensuring that the construction of Sizewell C does not generate effects greater than those forecast in the Transport Assessment (i.e.to ensure the efficient and effective operation of the highway network). A fund (contingent or otherwise) for journey time delays is not justified and not proposed.	(ii) SCC set out its position with regard to delays in paragraph 20 and 21 of REP6-049. This has been a matter of much debate with the Applicant and SCC is of the view that provision by the applicant of funding for improvements on the A12 and a contingency fund to mitigate other impacts identified through the TRG is acceptable. In terms of monitoring delays there will be a significant amount of data available to the TRG, for example journey time data from the DMS. As the highway authority SCC also collects data which can inform the TRG on this matter.

HW.2.4	(…) SZC Co. has agreed with SCC both parties would prefer HWHW services to be contracted out from Sizewell Health to SCC, as this presents greater synergy with local public health and health care. This is reflected in the updated **Draft Deed of Obligation** (Doc Ref. 8.17(F)) definition of the occupational health service with a footnote noting that wording needs to be refined at D8 to allow for a scenario where this is not practicable e.g. because SCC do not have the capacity to provide this service, or it is not at a reasonable market rate when compared to other providers offering the same level of service provision.	SCC can confirm that we have reached in-principle agreement with regard to sexual health services, as set out in the Applicant's quoted answer, and we expect that requested amendments will be included in the next D8 draft Deed of Obligation that reflect our requirements.
LI2 Landscape impact, visual effects and design		
LI.2.2	(…) SZC Co. has reached agreement with ESC and SCC over the scope, scale and governance arrangements for the Natural Environment Fund, which provides an appropriate response to the residual impacts on the landscape. It is also worth noting that SZC Co. has agreed the scale of the Environment Trust, which will be secured separately to the Deed of Obligation. SZC Co. continues to work with the Councils and other stakeholders to finalise the detail (which will be secured through a separate legal agreement) including matters relating to governance. The Trust will have available to it £1.5 million per year of construction and the first 20 years of operation, and £0.75 million per year of the remaining operational phase. Further details will be provided to the community in the coming few months.	SCC strongly welcomes the commitment of the Applicant for the setup and scale of funding proposed for the Environment Trust; we also support the proposal for the "front-loading" of the funding for this trust, so that more money is available during construction and the first 20 years of operation. SCC has received and is reviewing a draft of the separate legal agreement to secure the trust and its funding, and continues discussion with the Applicant on the governance of the trust, but is optimistic that a workable approach can be agreed. To clarify, SCC is content that the combination of the Natural Environment Fund secured through the main Deed of Obligation and the funding of the Environment Trust provides an appropriate response to the residual impacts on the landscape and to the residual harm on the landscape character, the visual amenity, ecology and the special

		qualities of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) [although we note that SCC continues to consider that this residual harm could be reduced by removal of pylons and outage car park]. SCC is content about the scope and governance proposed for the Natural Environment Fund, and agrees with the combined scale of the Natural Environment Fund and the Environment Trust Funding. There are further discussions with and clarifications from the Applicant required, on matters of detail and the relationship between the Natural Environment Fund and operation and scope of the proposed Environmental Trust that need to be resolved.
LI.2.9	**Alternative Outage Car Park Note** Please review and comment on the content of the SCC submission [REP5-171]. SZC Co. notes and welcomes Suffolk County Council's re-confirmation at Paragraph 1 that it agrees there may be occasions where a single outage car park will be inadequate. This reflects SCC's statement in Paragraph 4.37 of its **Written Representation** [REP2-189]. Paragraph 2 is noted, although for the ExA's benefit the reference SCC provided to their Written Representation in that note should have been [REP2-189]. At Paragraph 3, SCC seeks an indication of the level of likelihood of two (or three) outages happening in parallel. The Sizewell complex will have three active reactors (one at	We note the Applicant's comments and clarifications in its response to LI.2.9 and LI.2.10. The Applicant's response to the issue of the question of risk of a double outage occurring does not provide the answer to the level of probability that exists. There is a 22% chance that if an outage occurred, that it would be within the period when there was already an outage taking place. This does not deal with the frequency within which it is estimated that a forced outage would take place. Thus, if a forced outage only occurred once every 10 years, there would only be a 22% chance that this would coincide with an outage in another plant in that whole period. Therefore, the likelihood of there being a need for two outage car parks on a frequent basis is very low.

	Sizewell B and two at Sizewell C). Assuming that planned outages are staggered and the typical schedule for each reactor over an 18-month period is 2-months outage and 16-months no outage, then each reactor would be in a planned outage 11% of the time. Applying this to the likelihood of double or triple concurrent outages: - *Double outage:* Two of the three reactors would be in a planned outage for 4 months out of 18, or 22% of the time. This means that there is a 22% chance in any given 18-month period that a forced outage on the other reactor would clash with a planned outage on one of the first two reactors. Forced outages happen randomly and the likelihood of a double outage clash needs to be planned for. - *Triple outage:* By contrast, the likelihood of two reactors going into a forced outage at the same time as a planned outage on the other reactor is far lower. This is because two randomly occurring events would need to happen at the same time as the 11% chance that the other reactor is already in a planned outage. The compound probability of a triple outage is significantly less likely. A response to Paragraph 4 is set out in Response to Question LI.2.10 below and is not repeated here. Whilst SCC is correct in Paragraph 5 that only relevant staff would be involved in forced outages, as would be the case in any repair for any work, they offer no advice as to the number of outage staff that would entail. This is because	SCC notes that for traffic modelling purposes the Applicant proposed during scoping that a single outage was considered for the operational year scenario and based on the rational provided accepted this. We stress that the approach suggested by SCC in [REP5-171] should be seen as one of many alternative options to the outage car park at Goose Hill as proposed by the Applicant. As [REP5-171] states in para 20, “Of course, there may be other alternative approaches to deal with parallel outages to the one proposed in this paper, which still would avoid the additional development of an outage car park within the AONB.” Notwithstanding that, we consider that the constraints of planning permission could be overcome by seeking a permanent planning permission for the occasional use of a site as an outage car park. This could then be retained by commencing the development through constructing the accesses (our submission at REP5-171 stated that it would be important for these to be established at an early point in order to allow swift establishment of the rest of the facility when required) and the permission would then not lapse, though the full car park facilities would not be required to be established until the occasion required. In the meantime, the land could continue to be used for agricultural purposes. We can also confirm that, whilst improved alternative transport modes (direct bus services) and car sharing could considerably reduce the demand for outage car parking, we

	clearly it is a specialist matter that SCC cannot reliably advise on and it depends on the maintenance or repair that needs to be made. In some cases staff numbers can be very substantial (up to 1,000) in order to complete the work as soon as reasonably possible. For example, in its current unplanned outage, Sizewell B has required up to approximately 1000 outage workers on site. This number of workers were on site for approximately 3 months of the outage. In Paragraph 6, SCC seek details relating to the environmental assessment of a clash between outages. This is set out in Section 1.8 of the Applicant's **Written Submissions Responding to Actions Arising from ISH5** [REP5-117]. Paragraph 7 appears to contradict SCC's own assertion in Paragraph 1 that there may be occasions where a single outage car park will be inadequate. Mr Lavelle is clear at Paragraph 1.5.24 of **Written Summaries of Oral Submissions made at ISH5** [REP5-110] that both an operational car park and an outage car park will generally be full to almost overflowing during a single outage. The Applicant agrees with SCC's view at Paragraph 8 that an off-site permanent facility is not appropriate. The "Sizewell C Transport Strategy Hierarchy" that SCC refers to in Paragraph 9 sets out SZC Co's process for minimising road-based traffic, followed by other measures	do not consider that this necessarily can remove the need for an outage car park altogether. A robust Operational Travel Plan that considers outage workers would be highly beneficial in managing demand, implementing mitigation measures and reducing the demand for parking. This could be considered as a reasonable alternative to providing excess parking or at least reducing the amount of excess parking. We also understand from the Applicant's comments in LI.2.10, that confirms that, once there is one occasion of a parallel outage, the likelihood is that the following outages would continue to be run as parallel outages (until another unplanned outage would occur). We appreciate that this would make a temporary outage car park, as proposed in [REP5-171], less feasible, though we consider that the difficulties for the recruitment of sufficient numbers of skilled staff and of then accommodating them in the area would mean that there would be strong economic and practical advantages for minimising the number of reoccurrences when such an overlap would take place. However, even if there can be a case made for a permanent outage car park, it does not seem that issues are insurmountable to locate the outage car park at a location outside of the AONB. It is recognised that the current DCO application does not include such an offsite provision, and given the late stage of the examination, it would not be possible within the examination period to change the DCO

	where necessary. The scale of traffic generated by coincident outages would be significantly less than the peak construction impacts which have already been assessed and so this hierarchy is not considered relevant to double outages. It has no meaningful link with how SZC Co. will respond at short notice to a randomly occurring event to safely bring the power station back online as soon as possible, which requires on-site car parking. Paragraph 9 also advocates car sharing and direct bus services for both operational and outage staff. The implication of this paragraph when read in the context of Paragraph 10 is that SCC assert these measures could remove the need for an outage car park altogether. In the light of that, the Applicant is unclear why SCC chose to not object to the Sizewell B outage car park on greenfield AONB land at Pillbox Field (planning application reference DC/19/1637/FUL2), if indeed it does consider the above measures are a realistic alternative. Clarification from SCC on this apparent inconsistency would be welcomed. SCC suggests an alternative proposal in Paragraphs 10-18 and SZC Co. responds to these points collectively below. As SZC Co. understands it, SCC employs farmers/contractors and their plant (i.e., tractors) to support snowploughing on a call-off basis during each winter season. Whilst on the face of it this seems to be a relatively	application to that effect. There would still be a period of at least ten years until the outage car park was required, which would allow for a TCPA application to be made. Possible alternative locations could include those of the temporary Associated Developments, such as the LEEIE or the Northern Park and Ride. It is noted that the LIR (para 16.25) considers a potential "for a legacy benefit of retaining a small proportion of parking at the southern end of the site associated with railway station parking. This would require planning permission." A similar approach, albeit at a larger scale, could be taken for the outage car park. There is no evidence that the difficulties suggested by ESC in its comments in [REP6-032] mean that a site could not be found that was more acceptable than one in the AONB, especially as it is anticipated that this would include very intermittent use. Furthermore, SCC considers that it would be quite possible to find a site which had acceptable road access. There is no inconsistency in SCC's position that it did not object to the use of Pillbox Field as a replacement outage car park for Sizewell B. It is recognised that there will be regular occasions when one car park is required for outages. What it finds as unacceptable is the building over of part of the AONB for a purpose which may be very intermittently used.

[2] East Suffolk Council Planning Website: https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=PQ5NVGQXJJ100

	straightforward and sensible approach for that undertaking, the same would not apply for an outage car park. The reasons for this are set out below: • *Outages can last longer than 28 days:* Forced outages can last for longer than 28 days and the temporary car park would require planning permission in accordance with Class B of Part 4 of Schedule 2 of the **General Permitted Development Order** (2015, as amended). It is noted that the current extension of permitted development rights (Class BA) to a total of 56 days per calendar year, which was created in response to the pandemic, will expire at the end of 2021 and is therefore not relevant. • *Setting up a temporary facility takes time:* This point is recognised by SCC in Paragraph 18 and this time would count towards the 28-day limit, as does removing the facility, thereby reducing the remaining permitted time available for use of the space as a temporary car park. The same would apply to the bus terminus and substantial associated facilities and structures required at the power station site. • *Highway safety:* Development permitted by Class B does not require highway safety to be taken into account. The Applicant is unsure whether SCC is advocating the temporary use of local farmland for large numbers of coaches and 600 cars that will inevitably need to pass each other and other vehicles on roads that are not designed for such use? The ExA may recall the difficulties experienced	It is for the Applicant to evidence that there is an overriding need to locate the outage car park within the AONB, in the absence of alternatives. SCC remains unconvinced that alternative arrangements are not possible and reasonably achievable, that would not involve the additional land-take within the AONB. Therefore, we recommend the Examining Authority, and ultimately the Secretary of State, to examine carefully whether this aspect of the proposal is appropriate as it stands, or amendments could be sought before a final decision is taken.

	when sending a single coach down a local rural road on the Accompanied Site Visit and it met a single car travelling in the opposite direction. • *Ecological considerations:* SZC Co. will need to accord with all relevant legislation and regulations. As the farmland would not be in temporary use as a car park for the majority of the time, there is a realistic prospect that protected species may inhabit the site and therefore the Applicant would need to satisfy itself through surveys that there is no risk of harm before installing temporary structures. It is an offence to proceed without a protected species licence when one is required. • *Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017:* Linked to the point above, the development would be part of Sizewell C, which is a Schedule 1 development under the EIA Regs. Permitted development rights would not apply unless the LPA has adopted a negative Screening Opinion. Whilst a Screening Opinion could be sought in advance, it is not feasible to expect the Applicant to take a judgement call at very short notice on whether there has been a material change in circumstance on that site. If there was then the Screening Opinion would be out of date, permitted development rights would be removed and the temporary use of that land without planning permission would be unlawful. • *Planning permission for an intermittent development of this nature could not be pre-emptively secured in*	

	advance: Whilst time-limited planning permissions that require removal after a pre-defined period are commonplace, it would not satisfy the necessary tests to permit a scheme that is developed and then demolished as and when it is needed (Paragraph 56, National Planning Policy Framework 2021 and Regulation 122, Community Infrastructure Levy Regulations 2010). Clearly applying for a new planning permission each time a forced outage occurs would take too long. An application for a 600-space car park in the Countryside is considered to be unlikely to gain planning permission as it is likely to conflict with **Suffolk Coastal Local Plan** (September 2020)[3]. SZC cannot be dependent on such uncertainty. The objective of a forced outage is to safely bring the NSIP back online as soon as possible. Relying on adequate temporary arrangements being in place off-site in a timely manner is not a realistic prospect for the reasons demonstrated above. SZC Co. also notes and agrees with Page 103 of ESC's **Comments on any additional information/submissions received by D5** [REP6-032]. SZC Co. agrees with the reasoning put forward by ESC on Page 103, as local planning authority. SZC Co. also	

[3] East Suffolk Council – Suffolk Coastal Local Plan (September 2020). https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf

	considers that the alternative put forward by SCC would be unlikely to be acceptable in planning terms. SCC's proposals are unclear. There is no reasonable alternative to the proposed on-site outage car parking and that exceptional circumstances exist in accordance with Paragraph 5.9.10 of NPS EN-1. The outage car parking proposed by SZC Co. falls entirely within the nominated site boundary for Sizewell C. Paragraph 2.4 of the **Appraisal of Sustainability: Site Report for Sizewell (November 2009)** states: "The site includes land in the Goose and Kenton Hills to provide for an access road and other facilities which may be located outside the nuclear power station boundary. The Goose and Kenton Hills are former areas of heathland although land use is now principally commercial forestry." The Government was fully aware that this area may be developed for an access road and ancillary facilities. There should not therefore be an in-principle objection to the development of an ancillary facility, such as an outage car park, in this location because the purpose of the Government's selection exercise was to rule out sites which were unacceptable in principle. The Applicant also refers the ExA to Mr Philpott QC's written summary of his oral submission made at ISH5, particularly Paragraphs 1.5.6 – 1.5.9 [REP5-110]. Those matters have still not been addressed by SCC.	

LI.2.10	Where a forced outage occurs within a few months before a planned outage, the two outages for the relevant reactor may be combined for efficiency purposes where it is economically and environmentally responsible to do so. A decision to combine the outages would occur on a case-by-case basis. The decision to combine the outages is based on a consideration of both the reduced power-station downtime (and therefore the reduced loss of electricity generation) and the remaining operational life of the nuclear fuel. This is because a planned outage typically includes refuelling. Once a planned outage period is shifted, future planned outages would then resume an 18-month cycle to gain the most benefit from the nuclear fuel. The Applicant respectfully confirms that SCC is wrong in its assumption that further outages are likely to be moved by the operator for the reasons they cite at Paragraph 4 [REP5-171]. This is because: • Delaying a future planned outage to avoid a clash would be a major commercial risk, with a significant cost to the operator if a restart was delayed. • SZC Co. would seek to make efficient use of nuclear fuel. Bringing forward a future planned outage to avoid a clash, without the presence of another forced outage to influence that decision, is not considered to be environmentally or economically responsible.	See above.

LI.2.12	On the subject of an alternative form of power export connection, SZC Co. has provided substantial information to show its consideration of alternative proposals and considers the broad proposal put forward by SCC to be neither workable nor achievable. A full explanation of the option evaluation process for the power export connections is given in the Technical Recommendation Report **Appendix 5E** of SZC Co's **Response to ExQ1s** [REP2-108]. Responses to the questions raised specifically on the potential suitability of Gas Insulated Lines (GIL) are detailed in SZC Co's response to question ExQ1 LI.1.51 [REP2-100]. A Requirement for post-consent approval, as suggested by SCC, is considered to be neither necessary nor reasonable. The Applicant refers the ExA to Mr Philpott QC's contribution to **Written Summaries of Oral Submissions made at ISH5** [REP5-110], particularly Paragraphs 1.5.6 – 1.5.9. Those matters have still not been addressed by SCC.	SCC's views are unchanged from our previous position explained in [Rep2-189], [REP5-172] page 60, and [REP5-176] , that we remain unconvinced that technical issues are insurmountable to avoid the need for pylons and overhead lines and it considers the use of gas insulated lines to be a viable alternative.
LI.2.30	SZC Co. have been discussing this requirement with both SCC and ESC. ESC consider that they are the appropriate discharging authority for this requirement, as they are able to look at the landscape proposals in a comprehensive manner and ensure that any proposals are considered with an appropriate planning balance. SCZ Co. agrees with ESC and has therefore not made any change to the requirement to the effect SCC have requested. It should also be noted	Following further discussions between the Local Authorities and the Applicant we have reached agreement that, whilst ESC will lead the discharge for landscaping for this scheme both within and beyond the Highway Boundary, rather than the discharge of requirements being split, there will be an additional provision for the undertaker to consult the highway authority regarding those proposals within the highway boundary before submitting details to ESC for approval. In this way, SCC would have input at the formative

	that SCC would be a consultee on the discharge of the detailed landscape proposals and ESC would be obliged to have proper regard to any representations that are made in respect of the landscape proposals. ESC would therefore be in the best position to determine the application. SCC, as the highway authority, would separately have to agree the proposed highway works, drainage and landscape buffer associated with the highway as part of the details that need to be approved as part of Article 21 of the DCO. This is considered to be a more appropriate place for SCC to define their requirements for the highway landscape works.	stages of such proposals (as well as consultation in the discharge process via Schedule 23, paragraph 1(4)). This would be on the basis of the following being included in R22A, which we understand is acceptable to the other parties: "(2) Before submitting details under paragraph (1) which relate to any proposals within the proposed highway boundary, the undertaker must consult the highway authority regarding those proposals."

SCC RESPONSE TO [REP7-055] SZC CO. RESPONSE TO EXQ2 VOLUME 1 PART 6

Ref	SZC Co statement in [REP7-055]	SCC Deadline 8 response
TT.2.0	(i) In addition to the precedent of the successful similar structure of the TRG at Hinkley Point C, as set out by SZC Co. in ISH3 [REP5-108], the Applicant does not consider a casting vote appropriate because the powers of the TRG are wide, including imposing a potentially uncapped liability on the Applicant to spend significant sums of money or take any action to remedy issues or stay within the limits committed to. All normal highway functions would be carried out by SCC – for example in relation to the design and implementation of agreed works on the highway etc. but the TRG is a wider governance process which requires a collaborative approach to joint working. In particular, the TRG has power over the Contingent Effects Funds 1 and 2, which are capped. TRG can amend the CWTP and the CTMP and the TRG also has power to approve mitigation measures to address shortfalls or exceedances in the event that any of the targets or limits set out in the Construction Traffic Management Plan (CTMP) [REP2-054] or the Construction Worker Travel Plan (CWTP) [REP2-055] have not been achieved or have been exceeded, or are not reasonably likely to be achieved or are likely to be exceeded. Any member of the TRG may propose such mitigation measures, not just SZC Co. This power enables the TRG to impose a potentially uncapped liability on SZC Co. Amendments to Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)) to be submitted at Deadline 7 have sought to make these powers of the TRG clearer. In light of these wide TRG powers, SZC Co. does not consider that any one TRG member should have a casting vote. Imposing a potentially	SCC does not consider current TRG proposals as appropriate or effective. Its D8 [ISH14 post hearing submission] sets out three options to make the TRG effective: (1) the voting rights of the TRG to be unequal in favour of SCC, ESC, Suffolk Constabulary and National Highways; or (2) SCC given a casting vote on the TRG; or (3) TRG is set up as a non-voting group that would seek consensus, and, in the exceptional circumstance where there is a dispute, the issues should be resolved by referral to seniors and ultimately expert dispute resolution. SCC welcomes the clarification within the Deed of Obligation on the ability of members to submit proposals. SCC welcomes the inclusion of the ability to call an emergency meeting; however, this requires a 28 Day notice period unless agreed by members of the TRG and so whilst an improvement is still slightly limited in its responsiveness. Following experience of remote working SCC considers that a method for online meetings would significantly improve the responsiveness of the TRG and can reduce the notice required for such meetings. SCC considers the claim that the TRG can inflict uncapped expenditure on SZC Co needs further

		uncapped liability on a developer, at the discretion of a third party such as SCC (who have sought a casting vote for themselves), is not fair or reasonable. It does not comply with national policy in NPS EN-1 paragraphs 4.1.7 – 4.1.8 that obligations should be fair and reasonable. Giving a casting vote to SCC could be akin to writing a blank cheque for wide ranging mitigation or operational changes. The ability to escalate matters to the DSG will enable any area where agreement cannot be reached to be re-examined by more senior representatives of the parties. It is reasonable to consider that may well lead to resolution. Escalation of disputes is a widely used and reliable method for resolving disagreements. In the unlikely event that resolution still cannot be reached, then Schedule 17 of the draft Deed of Obligation enables matters to be referred to an expert appointed in accordance with clause 8 of the draft Deed of Obligation, for independent determination which is final and binding in accordance with that clause. Overall, SZC Co. consider that this governance structure and process to resolve disputes will both be effective and appropriately protects the interests of all parties. It will also be sufficiently swift and responsive, for the reasons set out in the response to point (ii) below. (ii) The latest version of the draft Deed of Obligation, submitted at Deadline 7 (Doc Ref. 8.17(F)), includes provision for any member of the TRG to call an emergency meeting where that member considers it necessary (i.e. outside the regular quarterly meetings of the TRG). This would enable approval of additional interventions and mitigation where a rapid response is needed and enable consideration and response to be given to any other urgent matters.	examination (and note proposals put forward in SCC's D8 post hearing submission for ISH14). The contingency fund, the main source of mitigation funding for the TRG is capped through the deed of Obligation. Construction Traffic Management Plan REP2-054) Construction Workers Travel Plan (REP2-055) and the Deed of Obligation contain the same wording. The following refer to the CTMP paragraphs. The remit of the group in 2,3,1 is proposed to be as follows: • receive transport monitoring reports from SZC Co. relating to the implementation and operation of the CTMP (Doc Ref. 8.7(A)); • monitor the implementation of and compliance with the CTMP (Doc Ref. 8.7(A)); • agree actions <u>from the transport co-ordinator</u> for the continued implementation of the CTMP (Doc Ref. 8.7(A)); • consider the case for, and approve amendments to the CTMP (Doc Ref. 8.7(A)) <u>put forward by the transport co-ordinator</u>;

		• consider the use of the transport contingency fund if unmitigated significant adverse transport impacts arising from the monitoring require mitigation; • advise SZC Co. on potential enhancements to the CTMP (Doc Ref. 8.7(A)); • consider the Community Safety Working Group and Public Rights of Way Working Group meeting minutes with respect to transport and any actions arising from the meetings for the TRG; and • consider the views and opinions with regards to transport of the local transport and traffic groups, the parish councils and local community when carrying out its role. *All the actions listed above are put forward by the transport co-ordinator, not TRG* 8.3.2 The TRG will meet every month for the first 3 months and every 3 months thereafter throughout the construction phase. The TRG meetings will discuss the transport monitoring report and agree any refinements to the CTMP (Doc Ref. 8.7(A)) that are required. The following will be discussed at each TRG meeting: • consider the performance and effectiveness of the freight management measures; • consider any issues or breaches of the CTMP (Doc Ref. 8.7(A))and corrective action taken; and

		• discuss and agree any required actions for the ongoing implementation of the CTMP (Doc Ref. 8.7(A)). *It is not clear if the TRG can recommend action although 2.3.1 suggest this would be the Transport Coordinator doing so.* 8.3.7 Where it is considered by SZC Co. that, in the light of monitoring information or feedback, there is a need to amend or update the CTMP (Doc Ref. 8.7(A)), SZC Co. will submit an amended CTMP (Doc Ref. 8.7(A)) to the TRG for approval. 8.3.8 The TRG shall not be entitled to approve any amendments to the CTMP (Doc Ref. 8.7(A)) unless it is reasonably satisfied that the amendments are unlikely to give rise to any materially new or materially different environmental effects in comparison with those assessed in granting the DCO. 9.4.6 If the TRG considers it reasonably necessary that further corrective actions are required to address the breach and these have not been proposed by SZC Co., the TRG will require SZC Co. to submit proposals for further corrective actions to the TRG for approval. If SZC Co. fail to propose the requested proposal, then the TRG will invite Highways England or SCC (as relevant) to submit a proposal. *Paragraph 9.4.6 appears to be the only process by which the TRG members other than can submit a*

		proposal and this is as a result of a failure to comply by SZC. To summarise there are many checks and balances in the CTMP to prevent a the TRG demanding uncapped expenditure or additional liabilities for SZC Co. If there is a risk it would be repeated demands for data collection or abortive design. SCC considers by appropriate wording this matter can also be resolved.
TT.2.3	(i) See responses by SZC Co. to ExQ1 TT.1.61 [REP2-100] submitted at Deadline 2. That response confirms that the A12 improvements proposed by SCC between the A14 and A1152 have not been included or relied upon within the VISSIM modelling. These improvements are not committed and currently have no secured funding, and cannot be relied upon as a basis for assessment of the effects of Sizewell C. The VISSIM modelling of the A12 between the A14 and A1152 nevertheless concluded that there would not be a material impact on driver delay and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the corridor. (ii) SCC considers that the shortest possible timescale for their proposed A12 improvements would be for them to be completed by the end of 2025 and could therefore be operational by early 2026. However, this is subject to receiving Government funding and the planning and design process. Based on the SCC optimistic programme, there would be no benefits of the proposed improvements during the early years phase or the start of the peak construction phase of the Sizewell C project. Instead there would be disbenefits to all traffic on the corridor, including Sizewell C traffic, as a result of the forecast two years of construction of the proposed	i) SCC maintains its consistent position regarding the need for mitigation on this corridor. However, following detailed technical discussions regarding the significance of the impacts along the A12 between Seven Hills and Woods Lane, and notwithstanding the views expressed by SZC Co and SCC in previous submissions, agreement has been reached regarding a proportional contribution toward improvements to mitigate delays on this corridor. ii) Whilst estimated completion for the scheme is currently the end of 2025, that is the scheme as a whole. The scheme would be phased from start of construction and elements are likely to be completed throughout 2024 and 2025. Due to mitigation associated with the Brightwell Lakes housing development, a number of online schemes would be likely to be occurring during the construction period with or without the SCC scheme. Whilst the Council would look to minimise disruption along the corridor, as with

	SCC A12 improvements. The A12 improvements proposed by SCC identify highway capacity improvements at eight junctions on the A12 between the A14 Seven Hills and the A1152 Woods Lane, which include a range of measures such as signalising existing junctions, realigning arms of junctions, creating larger roundabouts and providing additional circulating lanes at roundabouts. It is also proposed to provide a new section of dualled road at Woodbridge. The majority of the SCC proposed A12 improvements are 'on-line' (i.e. improvements to the existing A12 corridor rather than constructing new sections of road/junctions on land outside of the existing carriageway) and would therefore require traffic management for the two year construction period which would result in some journey time delays for Sizewell C traffic and other traffic using the corridor. As set out in Chapter 9 of the Consolidated Transport Assessment [REP4-005], SZC Co. considers that there would not be an unacceptable impact of Sizewell C traffic on this part of the A12 corridor and no requirement for increased capacity has been identified. Notwithstanding this, it is considered that once the proposed SCC A12 improvements were operational there could be some short-term benefits for Sizewell C construction traffic although the extent of any benefits is considered to be limited. For example, any journey time benefit for the SZC traffic travelling on this section of the A12 needs to be seen in the context of the overall journey of the SZC traffic. The overall benefit to SZC HGVs on this section of the A12 would be negligible in percentage terms given the distances they will be travelling to/from the main development site. In addition, the primary purpose of the proposed A12 improvements is to reduce congestion in the network peak periods. However, Sizewell C construction traffic will be spread over the course of the day and will not be limited to	any highways scheme, including the Applicant's, there would be disbenefits to traffic as a result of traffic management during delivery. However, the exact level of disbenefit is not currently known. Whilst SCC considers that improvements as part of the MRN scheme are needed to mitigate the traffic impacts of the proposed Sizewell C development, SCC acknowledges that the purpose of the full MRN scheme follows a long term strategy which is modelling the schemes for a future year of 2040 to: • improve the capacity of the major road network (MRN) • reduce congestion and improve journey time reliability on the A12 • improve connectivity to the region's ports • support local economic growth and the creation of jobs • support the delivery of planned housing growth • support the visitor economy • support the Energy Coast • support and encourage walking and cycling • improve services for bus users As set out in our response to TT.2.5 at Deadline 7 [REP7-163], the modelling identifies improvements for all traffic, including Sizewell C traffic. The scheme is currently returning sufficient journey time user benefit

	the network peak periods, which will further reduce any benefits to Sizewell C traffic. In order to provide an estimate of the duration of any short-term benefits, the Sizewell C HGV and workforce profiles have been reviewed against the SCC outline programme of the A12 improvements. It can be seen from the HGV profile included in the Material Imports and Modal Split Paper Appendix A [REP5-114] that the daily number of HGVs reduces considerably for the last three years of construction and would be negligible for the operational phase. Therefore, any benefit of the A12 improvements to Sizewell C HGVs would only be for the six years between the start of 2026, which is the earliest date when the improvements might be expected to be operational, and end of 2031. Any delay to the SCC optimistic programme for delivery of the A12 improvements would further narrow this period of potential benefit. Likewise, it can be seen from the workforce profile included in Volume 2, Appendix 9A of the ES [APP-196] that the workforce is expected to peak in year 7 (2029) and reduce after that point, with there being an average of circa 1,700 workers (construction and operation) for the last three years of construction. The workforce vehicle trips would align with the workforce profile and therefore any benefit of the A12 improvements to Sizewell C workers during the construction phase travelling on this part of the network would be predominately limited to the period of time between 2026 and 2031. In summary, notwithstanding that SZC Co. does not consider that there would be an unacceptable impact related to Sizewell C on this section of the A12, the SCC proposed highway improvements may result in some	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 the consented mitigation agreed as part of the Brightwell Lakes development.

	short-term benefits to SZC traffic on this section of the A12 but, as set out above, these are considered to be limited. In addition, any limited short-term benefits would be reduced by disbenefits (i.e. journey time delays due to on-line roadworks) during the construction of the A12 improvements. It is worth highlighting that SZC Co. and SCC have agreed a contribution to SCC's scheme. Please refer to the draft Deed of Obligation for details.	
TT.2.4	Both sets of figures are correct. It should however be clarified that the figures stated in the CTMP [REP2-054] are correct but they are peak HGV movements and not an average over the construction period. The CTMP [REP2-054] will be updated to clarify this. The distribution of materials over the construction of a project is not even and therefore an assessment of average movement requirements over the total construction period cannot be undertaken. SCC's tabulated figures assume even distribution over 313 (Mon – Sat) or 261 (Mon – Fri) working days of the year. The early earthworks phase and latter surfacing phase of the highway schemes demand much greater HGV imports than outside of these periods.	SCC welcomes this clarification regarding the figures being peak movements. SCC has always recognised that there would not be a flat profile, but sought to understand the differences between the figures presented and also to highlight that the controls being proposed from Associated Development sites are far higher than the average day. Whilst SCC appreciates the purposes of assessing peak figures particularly with regards to Environmental Assessment, the Council continues to encourage the Applicant to reduce any caps where reasonable through good project management. For instance can the peak figure for the Sizewell Link Road be reduced down given the average figure is only one third of the peak, as set out in out comments on TT.1.15 at [REP3-084] comments on responses to EXQ1.
TT.2.5	SZC Co. has agreed to provide a contribution for the upgrade of Darsham Level Crossing to a full barrier crossing. As this is an existing safety concern for Network Rail with future funding understood to be set aside for the work, SZC Co. has proposed to provide a contribution of 50% of the cost of the full upgrade. This is still under discussion between the parties. Darsham, of course, is not affected by Sizewell C trains and the	The improvements at the Darsham Level Crossing would be a project sponsored by Network Rail with a contribution towards the cost from SZC Co. SCC would welcome any such improvements on both safety grounds and for improving pedestrian facilities. A small

	issue at Darsham arises from the location of the station car park across the A12 from the station. The current half barrier can encourage or enable unsafe behaviour from rail passengers. The Northern Park and Ride will add to traffic levels on this stretch of the A12 but the issue is understood to arise when traffic is static and the level crossing is in operation. Cars destined for the park and ride coming from it or buses coming to and from it to Sizewell C main development site in those circumstances would add to any short-term queue on the highway and should not in themselves pose a safety risk. Network Rail is believed to measure these issues on the basis that any increase in traffic in these circumstances theoretically adds to the (existing) risk. SZC Co. has agreed a Framework Agreement with Network Rail which commits the parties to work together to address the issue and is willing to contribute towards Network Rail's planned improvement. SZC Co. does not regard this as a 'requirement' in the sense understood by planning policy.	element of work within the public highway to improve the shared footway / cycleway is likely to be required together with modification of road signs and road markings. SCC is content that these matters can be addressed either through an arrangement with Network Rail so it is delivered as part of their scheme or separately as part of the s278 works for the Northern Park and Ride.
TT.2.8	The 'early years' is defined within the Construction Traffic Management Plan [REP2- 054] and Construction Worker Travel Plan [REP2-055]. The definition and rationale for the early years was discussed at ISH3, which is summarised at paragraph 1.2.1 of the Written Summaries of SZC Co.'s Oral Submissions at Issue Specific Hearings 3 [REP5-108]. With regards to HGVs, the early years is defined in the Construction Traffic Management Plan [REP2-054] (paragraph 4.4) as the 'period of time prior to the delivery and availability of the Sizewell Link Road (SLR) and the Two Village Bypass (TVBP). In that period, the control applies that there can be no more than 600 two-way HGV movements per day'. With regards to the construction workforce, the early years is defined in the Construction Worker Travel Plan [REP2-055] (paragraph 3.4) as the 'period prior to the delivery of the northern or southern park and ride facilities. In that period, the control is provided by the early years mode share targets'. The distinction between the Early Years period and the	SCC set out our response at Table 5 of [REP6-049] our concerns regarding to having two definitions for Early Years, which are linked to the delivery of infrastructure in contrast to the remainder of the elements in the implementation plan which are delivered to calendar dates. In response to the concerns expressed regarding the two Early Years scenarios, and specifically construction traffic accessing the SLR construction site from the B1122, SCC accepts that the Applicant's proposal to cap HDV (not HGV) movements on the B1122 (REP7-062) would be an acceptable measure. Although content with this cap, SCC recognises that the water tanker movements associated with the early part of the water supply strategy and movement of fill

	later construction and operational phases ensures that vehicle movements are appropriately controlled, until such time that suitable infrastructure is available to mitigate the forecast transport impacts. The separate definition for Early Years for (a) freight and (b) construction workforce is to ensure that the project is not unnecessarily constrained beyond the point at which mitigating infrastructure relevant to either (a) freight or (b) the workforce is provided. This is why it is not appropriate to have a single approach to defining the Early Years. The Early Years definitions and controls are set out in in the CTMP [REP2-054] and CWTP [REP2-055], which will be annexed to the Deed of Obligation (Doc Ref. 8.17(F)) and will be secured by that deed. Schedule 16 (paragraph 2.2 of the draft Deed of Obligation (Doc Ref. 8.17(F)) requires SZC Co. to implement and act in accordance with these documents. That provides the necessary control.	material from the TVB and SLR to the main site will present a risk for the applicant in terms of compliance. See also SCC D8 post-hearing submission on ISH14
TT.2.9	Schedule 2, Requirement 8 of the draft DCO submitted at Deadline 7 (Doc Ref. 8.17(F)) includes parking controls for the main development site that are two-fold: First, the draft Requirement requires SZC Co. to build and use the car parking in accordance with Table 4.1 of the Construction Method Statement [REP5-048], which provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking relates to. Secondly, parts 2a) and 2b) of draft Requirement 8 provide a control of the maximum limit of car parking within Work No. 1A before the northern or southern park and ride facilities are operational to 650 car parking spaces and after the northern or southern park and ride facilities are operational to 1,000 car parking spaces. Both the main development site car park and Land East of Eastlands are included in Work No. 1A. The early years limit of 650 car parking spaces prior to the northern or southern park and ride facilities are available has been calculated from the combined	As set out in our responses at Table 5 para 1.2. and Table 8 para 1.6.10 and 1.6.63 of REP6-049, SCC does not agree that the proposed car parking limits and modal split provide a sufficient control on worker vehicle movements. However, we consider that sufficient monitoring, reporting and governance through the TRG would allow for proactive and reactive management of any issues as they arise. During the Early Years, the car parking is not constraining vehicle movements and certainly not across the entire day, so if there is an increased workforce, even if it is achieving the modal split, the potential exists for additional movements. That being said, SCC, is close to reaching agreement with the Applicant as to the extent of

	maximum accumulation at the main development site and LEEIE park and ride site (see Table 34 in Appendix 7B to the Consolidated Transport Assessment [REP2-046]), based on an 80% occupancy level. The 1,000 car parking space limit once the northern or southern park and ride facility are available is based on the total number of car parking spaces proposed at the main development site during the construction phase. Therefore, the combination of the car park phasing in the Construction Method Statement [REP5-048] and the absolute limits on car parking ensure that the mode share targets are met. Refer to the response to (i). Table 4.1 of the Construction Method Statement [REP5-048] shows that the LEEIE park and ride facility will only be available for Phase 1. Schedule 2, Requirement 8 of the draft DCO (Doc Ref. 3.1(G)) requires the car parking to be built and used in accordance with the Construction Method Statement. Table 4.1 of the Construction Method Statement [REP5-048] provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking is limited to being used for. Therefore, this acts as a control to prevent the creation of additional parking beyond that required at any point in time and beyond that set out in the Construction Method Statement. The absolute limit on parking spaces during the construction phase once the northern or park and ride facilities are available has been set at 1,000 spaces, as set out in part 2b) of draft Requirement 8 in Schedule 2 of the draft DCO (Doc Ref. 3.1(G)). This ensures that the total number of car parking spaces in Work No. 1A is limited to 1,000 spaces but that operational parking may be used by construction workers in the latter part of the construction phase when the temporary car parking at the main development site is being decommissioned.	monitoring and reporting required, which would alleviate these concerns. SCC has accepted the modal splits set out within the CWTP, both the targets based on the assessed figures and the aspirational target; however, as set out in Appendix 3B of [REP7-057]; the build out rate for the Accommodation Campus is setto begin Q4 of Year 3 and would not be completed until Q2 of Year 6. The peak construction mode shift targets require the delivery of the accommodation campus to achieve this modal split. We consider it not unreasonable to assume that the development will fail to achieve the main targets between delivery of the park and ride sites and completion of the accommodation campus, which might represent four years of the project's build out. Depending on the delivery, this could result in additional impacts. The aim of the TRG would be to identify the likelihood of these occurring and respond appropriately, such as through additional local bus services; however, even these could potentially have an impact. Table 4.1 of [REP5-048] does set out that the LEEIE Park and Ride facility car parking would only be available for Phase 1. The Implementation Plan [REP2-044] indicates that Phase 2 would begin in Q1

		2025 and that the park and rides would be complete in Q3 2024, it is assumed on this basis that if the park and ride delivery were delayed by 3-6 months then there would be no park and ride facilities at the beginning of Phase 2. This suggests that it is important that Phase 2 does not commence until the Park and Rides are delivered.
T.2.10	The assessment table in Appendix A of Appendix 5A Sizewell link road: Principle and Route Selection Paper Appendix 12 in the Responses to the ExA's First Written Questions (ExQ1) [REP2-108] has been reviewed and it is considered that the vehicle km results for Route W and Z should have been transposed and that route Z would result in 11% more mileage that route W. This aligns with the assessment for HGVs and buses in Table 5 of [REP5-114], which concluded that there would be 8-10% additional mileage for buses and HGVs to use the Sizewell link road when compared with W North. The percentages are slightly different because the Peer Review within Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] was based on the integrated freight strategy, which resulted in more HGVs than forecast by the preferred freight strategy that has been described in [REP5-114]. The results presented in the Peer Review appended to Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] have been updated to correct this error as set out in the table below but the revisions would not change the conclusions of the Peer Review.	The Applicant states that the mileage set out within the Detailed Assessment and Scoring of Options table for Route W is incorrect and that in fact the Sizewell Link Road results in 11% more mileage that Alignment W. This has resulted in a change to the ranking presented in the table included in the Peer Review. Despite the amendments to the ranking, the Applicant has set out that Route W still has a lower overall score than that of the Sizewell Link Road in relation to the vehicle mileage. The significance of the savings by Route W is potentially underplayed in the route comparison assessment due to the lack of weighting against the assessment criteria.
T.2.11	Sizewell C HGVs and buses need to utilise the existing highway network during the early years prior to the delivery of the proposed new roads (i.e. Sizewell link road and two village bypass). Once the Sizewell link road is constructed all Sizewell C buses and HGVs from the A12 south	SCC response to 1.3.21 at [REP6-049] sets out our position that the impact of additional HDV movements on the B1122 may have been considered acceptable in the context of greater legacy benefits.

	and north will be routed on a fixed route with no route choice via the A12 and Sizewell link road, and this has been agreed with SCC. Were an alternative alignment to be selected (e.g. Route W), Sizewell C buses and HGVs from both the A12 north and south would also be assigned to Route W on a fixed route even if there were a more direct route that could be taken via the existing highway network – it would be the purpose of any new road between the A12 and the main development site to accommodate 100% of Sizewell C HGVs and buses as well as other Sizewell C related traffic. The question assumes that an alternative alignment (such as Route W) is constructed, but 329 HDVs two way per day from the north continue to use the B1122, rather than the new route. That such a significant proportion of Sizewell C HDV traffic would continue to use the B1122, rather than the new road, for the entire construction period, significantly defeats the purpose of and the case for the new road. Further, whilst SZC Co. recognises the impact on the B1122 communities in the early years (and is seeking to mitigate it as far as reasonably possible), the acceptability of HDV traffic on the B1122 for the relatively short duration of the early years does not make significant numbers of HDVs (e.g. the 329 HDV two way per day referred to in the question) acceptable over the full 12 year construction period.	The Applicant's response does not consider the greater proportion of LGVs likely to be attracted to Route W rather than the SLR (or B1119) nor the larger proportion of operational and outage traffic that uses routes to the south of Leiston.
TT.2.12	The Sizewell C car and LGV peak hour Veh-KMs are provided for 8-9am and 5-6pm peak hours in Table 4 of [REP5-114], representing all trips across the study area (not just those using the SLR/Route W North). These can be converted to the whole peak construction period using the following process: 1) Factor the 8-9am and 5-6pm peak hour Veh-KMs to 24hr average weekday (i.e. AAWT) levels, using the ratio of SZC traffic demand in the 8-	SCC have insufficient information to fully check these figures and the methodology, but the outcome which confirms that the Route W results in a saving in route mileage is considered to be a reasonable conclusion. SCC is of the opinion that the significance of the savings is underplayed in the route comparison assessment due to the lack of weighting against the assessment criteria.

	9am and 5-6pm peak hours to 24hrs, as provided in Table 7.2 and 7.3 in the Consolidated Transport Assessment [REP4-005]. 2) Factor the average weekday (AAWT) values to average daily (i.e. AADT) levels using the approximate ratios of workforce presence as follows: • 100% workforce present Monday-Thursday • 85% present on Friday • 50% present on Saturday • 30% present on Sunday • ~ 0.81 AADT/AAWT ratio. 3) Factor the average daily (AADT) values to the peak construction period (10 years, based on the construction workforce profile summarised in Volume 2, Appendix 9A of the ES [APP-196]) by multiplying by 365 days x 10 years. Note the two-year 'early years' construction period is excluded from this analysis since the SLR would not be in place. 4) Since the daily SZC trip generation is based on the peak construction workforce (7,900) the values must then be factored by the average workforce level across the 10-year peak construction period (~0.59, based on the workforce profile summarised in Volume 2, Appendix 9A of the ES [APP-196]). The additional calculations are shown in red in the updated 'Table 4' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C cars and LGVs.	A review of the Applicant's modelling indicates that during the Operational Phase across the AM peak hour of 08:00 to 09:00 that 160 SZC light vehicles would use the link road at its eastern end and 54 at its western end, this compares with 136 using the B1119 and 84 using the B1069. Across the PM peak hour of 16:00 to 17:00 that 151 SZC light vehicles would use the link road at its eastern end and 46 at its western end, this compares with 128 using the B1119 and 161 using the B1069. With regards to total traffic (e.g. SZC + other traffic) although the traffic flows increase on the SLR, the flows remain light on the western sections, with a maximum two-way flow of 128 vehicles being observed between 08:00 and 09:00. Higher flows are observed in the eastern section with a maximum two-way flow of 697 vehicles during 16:00 and 17:00, which is well below the capacity of the proposed route. On the southern routes, traffic flows on the B1119 and B1069 display a maximum of 624 vehicles and 722 vehicles on the B1119 and B1069 respectively between 16:00 and 17:00.

Updated Table 4: Comparison of Total Vehicle KMs (Sizewell C cars and LGVs)

Hour	Car total veh (km) SZC	LGV total veh (km) SZC	Total veh km
Sizewell Link road			
8-9 am	6,172	2,593	8,765
5-6 pm	18,438	1,783	20,221
Total (peak hours)	24,610	4,376	28,986
Total (24 AAWT)	255,935	27,284	283,219
Total (24 AADT)	206,576	22,022	228,598
Total peak construction (10 years)	422,522,224	45,043,362	467,565,586
Route W North			
8-9 am	6,098	2,555	8,653
5-6 pm	18,204	1,729	19,933
Total (peak hours)	24,302	4,284	28,586
Total (24 AAWT)	252,732	26,712	279,444
Total (24 AADT)	203,991	21,561	225,552
Total peak construction (10 years)	417,233,722	44,099,239	461,332,961
W North / SLR Ratio	98.7%	97.9%	98.7%
Difference	-5,288,502	-944,123	-6,232,625

For Sizewell C buses, the weekday (AAWT) totals are shown in Table 5 of [REP5-114], representing only the route section between the A12 and the

	main development site (i.e. buses from the north were both measured from the A12/B1122 to the main development site and buses from the south were both measured from the A12/Route W north junction to the main development site, regardless of Sizewell link road or Route W North). These can be similarly factored to average daily (AADT) levels based on the workforce profile (0.81), then factored to the 10-year peak construction period by multiplying by 365 days x 10 years. As with Sizewell C cars and LGVs, the bus frequencies would essentially be pro-rata'd to the workforce levels so these values should be factored by the average workforce level across the 10-year peak construction period (~0.59, based on the workforce profile summarised in Volume 2, Appendix 9A of the ES [APP-196]). For Sizewell C HGVs, the weekday (AAWT) totals are shown in Table 5 of [REP5-114], which represent the same route section between the A12 and the main development site as for buses. The peak construction period Veh-KMs can be derived as follows: 1) Calculate the weighted average distance between the A12 and the main development site (shown in Table 2 of Appendix 10 to Appendix 5D in [REP2-108]), based on the split of HGVs from south (85%) and north (15%). 2) The HGV delivery profile is provided in Appendix 6A of the TT.2.25 response to ExQ2 which indicates a total of 458,139 HGV deliveries to the main development site across the whole construction period. Considering the 10-year peak construction period (year 3 to year 12) for consistency, this yields 377,339 HGVs deliveries in the 10-year peak construction period. 3) Double the HGV deliveries to achieve 754,678 HGV movements to/from the main development site across the peak construction period. 4) Apply the weighted average distance (in step 1) to the total HGV movements for each route alignment.	

The additional calculations are shown in red in the updated 'Table 5' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C HGVs and buses.

Updated Table 5: Comparison of Total Vehicle KMs (Sizewell C HGVs and buses)

HGVs (Typical Day)				
South HGVs (85%)	425	5,436	3,557	-1
North HGVs (85%)	75	567	1,160	5
Total Typical Day	500	6,003	4,717	-1
HGVs (Busiest Day)				
South HGVs (85%)	595	7,610	4,980	-2
North HGVs (85%)	105	794	1,625	8
Total Typical Day	700	8,404	6,605	-1
Total Peak Construction	754,678	9,060,512	7,120,613	1,9
Buses				
South HGVs (85%)	296	3,786	2,478	-1
North HGVs (85%)	224	1,694	3,466	1,
Total (24 Hr AAWT)	520	5,480	5,943	4
Total (24 Hr AADT)	420	4,423	4,797	3
Total Peak Construction	858,466	9,046,458	9,811,681	765
Buses				
HGVs (typical) + buses	1,020	11,483	10,660	-4
HGVs (busiest) + buses	1,220	13,884	12,548	-1
HGVs + buses (10-year peak construction period) based on workforce and HGV profiles	1,613,144	18,106,970	16,932,293	1,1
W North / SLR Ratio (based on typical day HGVs)			93%	

W North / SLR Ratio (based on busiest day HGVs)			90%			

The updated Table 5 above presents the same picture to that reported in REP5-114, in that the Route W north would result in around 7% (i.e. 18,106,970 / 16,932,293 = 7%) fewer Veh-KMs for HGVs and buses than the Sizewell link road alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in Veh-KMs between the two alignments would be far smaller.

The updated Table 4, which considers the whole journey of Sizewell C cars and LGVs across the study area, shows that the difference in Veh-KMs between the two alternative route alignments is in the region of 1-2% (i.e. marginally more Veh-KMs with Sizewell link road than Route W North alignment).

Were this revised calculation to be factored into the analysis of preferred routes, it would make no material difference, partly because the percentage difference is relatively small but more importantly for all of the reasons set out, for instance, in Appendix 5D Sizewell Link Road: Principle and Route Selection Paper to SZC Co.'s responses to ExQ1 [REP2-108] and elaborated for instance at the CA hearing on 17 August, summarised in the oral and written submissions following that hearing (Doc Ref. 9.74 and 9.76) and set out in response to Question CA.2.10. Route W exists only as a theoretical, historic line on a map; it has not been worked up or presented as an alternative; it is not deliverable and it is not preferable in environmental terms to the selected Route Z (i.e. the Sizewell link road alignment). It is not an alternative in any practical sense

<table>
<tr><td></td><td>and it cannot now be promoted as such consistently with the policy position set out clearly in section 4 of NPS EN-1.</td><td></td></tr>
<tr><td>TT.2.13</td><td>The model was only used to compare the assignment of traffic with the Route W North alignment in the 8-9am and 5-6pm peak hours, so it is not possible to derive modelled journey times for other hours. Journey time comparisons are not usually extrapolated over a period (i.e. construction period) as one would not sum or average the journey times based on the different years.
Notwithstanding this, an approximate comparison of Veh-Hours for SZC HGVs and Buses, which would be on fixed routes, can be made by multiplying the average peak hour journey time by the number of vehicles across the 10-year peak construction period (see Table 5 in response Question TT.2.12), to compare the Veh-Hours undertaken on the route section between the A12 and the main development site.
Table 2a below provides an average journey time and distance of the two peak hours, and the percentage difference.
Table 2a – Peak Construction journey time and distance comparison (average peak hour)
<table>
<tr><th></th><th colspan="4">Average Peak Hour</th></tr>
<tr><th>Route</th><th>SLR</th><th>W North</th><th>Difference (s)</th><th>Difference (%)</th></tr>
<tr><td colspan="5">Average Journey Time (mm:ss)</td></tr>
<tr><td>A12 / W North (S) to main development site</td><td>09:21</td><td>06:25</td><td>-2:56</td><td>-31%</td></tr>
<tr><td>A12 / B1122 (N) to main development site</td><td>06:10</td><td>11:37</td><td>05:27</td><td>88%</td></tr>
<tr><td colspan="5">Distance (km)</td></tr>
<tr><td>A12 / W North (S) to main development site</td><td>12.79</td><td>8.37</td><td>-4.42</td><td>-35%</td></tr>
</table>
</td><td>The Applicant sets out a calculation for deriving vehicle hours for the peak construction period for the Sizewell Link Road and Route W. This identifies that there is 5% saving in vehicle hours for the Route W over that for the Sizewell Link Road, highlighting a benefit of the route.
No details on distance, factors, or models have been made available to undertake a check. It should be noted that the factoring of hours has only been undertaken for the AM and PM peaks when further hours are available which could have been utilised. The calculations appear reasonable, however, for avoidance of doubt, the end results cannot be confirmed without further detail being provided.</td></tr>
</table>

A12 / B1122 (N) to main development site	7.56	15.47	7.91	**105%**	

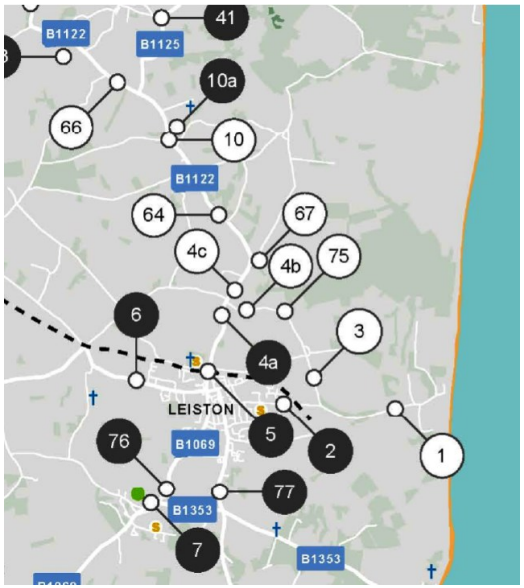
Table 2b provides a calculation of the 10-year peak construction Veh-Hours for SZC HGVs and buses, on the route section between the A12 and the main development site.

	Total Peak Construction period						
Route	**Number of HGVs**	**Number of buses**	**Total HGVs + Buses**	**Veh - Hours (SLR)**	**Veh - Hours (W North**	**Diff**	**I**
A12 / W North (S) to main development site	**641,476**	**488,665**	**1,130,141**	**176,140**	**120,784**	**-55,356**	**3**
A12 / B1122 (N) to main development site	113,202	369,801	483,002	49,675	93,537	**43,862**	**8**
Total	**754,678**	**858,466**	**1,613,143**	**225,815**	**214,321**	**-11,494**	**-**

These tables demonstrate that there would be around 5% fewer veh-hours for Sizewell C HGVs and buses using Route W North alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in veh-hours between the two alignments would be much smaller.

TT.2.14	(i) Details of the proposed Sizewell link road construction are set out in the Material Imports and Modal Split Paper Appendix A [REP5-	SCC has no specific reason for the use of the SLR as a haul route. Its concerns are related to how this affects

	114], which includes the early use of the SLR alignment for the haulage of some material. The section of the B1122 from the eastern end of the Sizewell link road to the construction site access point will be used as the access route to the site during both the early years and after the commissioning of the Sizewell link road. This short section of the B1122 does not have any sensitive receptors and Middleton Moor and Theberton are north-west of this location. (ii) During the early years 600 two-way HGVs have been assessed using this section of the B1122 between the SLR and main development site. However, 700 two-way HGV movements have been assessed using this section during the peak construction and, prior to the preferred freight strategy, the integrated freight strategy assessed up to 1,000 two-way HGVs on this section of the B1122 at peak construction during the busiest day. The use of the SLR as a temporary haul road during its construction would result in some additional HGV movements on the short section of B1122 between the Sizewell link road and main development site to those assessed in the early years but would be within the HGV movements assessed for this section of the B1122 for the peak construction. For example, once the SLR is available to be used as a temporary haul road during its construction, <u>there would be circa 20-30 two-way HGVs per day on this short section of the B1122 in addition to the 600 two-way HGVs per day assessed for the early years along the length of the B1122. For a short period (circa 5 months) there is expected to be 100-200 two-way HGV movements on this short section of the B1122 in addition to the 600 two-way HGV movements assessed in the early years along the</u>	phasing of the construction and particularly the impacts of the additional HGVs on those parts of the public highway used as part of the route. If SCC has understood SZC Co response (underlined) correctly, the number of HDVs using the B1122 between Theberton and the 'Main Site' will exceed the agreed cap of 600 HDV movements. This would not be acceptable to SCC. Further clarification would be required on • Where the temporary haul road would join the B1122 and what junction layout is proposed? • Will HGVs be accessing the Main Site at the main site access, the secondary access or via SZCB site access? In terms of the sensitivity SCC disagrees that this length of the B1122 is not sensitive. Link sensitivity (REP7-032) Link / Name / Sensitivity 1 / Sizewell Gap / Medium 3 / Lover's Lane (LEEIE) / Medium 75 / Lover's Lane / Medium 4b / Lover's Lane / Medium 4c / B1122 (N) Abbey Road / High 67 / Main Site Access / Very Low 64 / B1122 north of SZC access / Medium

	length of the B1122. The use of the SLR as a haul road during its construction acts to diverts these HGVs off the B1122 through Middleton Moor and Theberton prior to the SLR's formal commissioning. Whilst there will be additional HGVs for this short less sensitive section of the B1122 compared to the early years assessment, the HGV movements would not exceed those assessed for the peak construction for this section of the B1122.	Plan from APP-201  The authority notes that the combination of traffic using the SLR as a haul route and construction traffic using the B1122 has not been assessed in the ES.
TT.2.15	**Table 8.5 of the Consolidated Transport Assessment** [REP4-005] shows that in the early years (2023 Reference + SZC) the number of vehicles on the B1122 through Theberton is forecast to be 7,650 two-way vehicles per day. Table 8.9 shows that in the operational year (2034 Reference + SZC) the combined number of vehicles on the B1122 through Theberton and on the Theberton bypass part of the Sizewell link road is forecast to be 7,400 two-way vehicles per day. The ExA queries whether this demonstrates that the impact of the early years on the B1122 is too great or puts doubt into the legacy benefit for the B1122.	The ExA question on this matter neatly summarises the SCC concern about the lack of utility of the SLR in the operational phase This is particularly so when considered against the disbenefits of the scheme with environmental, community and financial costs. The Applicant sets out that in the Early Years, some 7,650 two-way daily vehicular trips would occur on B1122. Once the Sizewell Link Road is operational this would reduce to 400 two-way vehicular trips with the remainder using the Sizewell Link Road. The reduced level of vehicles is due to restricted route choice for

	The retention of the Sizewell link road would reduce traffic flows on the B1122 in the operational phase to circa 400 two-way vehicles per day, which allows for the road to be repurposed through a package of walk and cycle measures, which are being progressed with SCC and ESC. Were the Sizewell link road not to be retained then the B1122 would carry over 7,000 two-way vehicles per day and the repurposing would not be possible. The further benefits of retaining the Sizewell link road are set out in SZC Co.'s response to Examination Question CA.2.10. Further, SZC Co. recognises the short-term impact on the B1122 communities in the early years and is seeking to mitigate it as far as reasonably possible through a combination of demand management measures and physical improvements.	HGVs and buses for travel to site. As no Operational Travel Plan is available at this time, it is unclear how traffic travelling to the site will be controlled to ensure use of the Sizewell Link Road, with vehicle controls in place, when vehicles travelling from the south could use the alternative route along the B1119. It is appreciated that the Sizewell Link Road would provide some benefit to those travelling to the site such that they do not have to travel through the communities along the B1122 during the operational phase. If vehicles are unrestricted in terms of route choice, then there is nothing stopping the use of the B1119 therefore reducing the benefit of the Sizewell Link Road and increasing traffic elsewhere.
TT.2.18	The Implementation Plan [REP2-044] shows the indicative phasing, and duration of construction of the project, including the proposed environmental mitigation schemes included within the DCO order limits. Schedule 16 – Transport of the draft Deed of Obligation (Doc Ref. 8.17(F)) submitted at Deadline 7 has been updated to set out commitments for SZC Co. to provide funding to SCC for transport improvements as well as commitments for SZC Co. to deliver a number of additional off-site highway, traffic management and public realm schemes (e.g. Leiston Improvement Scheme, Wickham Market Improvement Scheme, B1078 Road Safety Improvements, Marlesford and Little Glemham Improvement Scheme etc). The timing of the delivery of the schemes to be delivered by SZC Co. set out in Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)) has been discussed and agreed with SCC and is reflected in the draft Deed of Obligation (Doc Ref. 8.17(F)).	SCC is awaiting details of when the highway schemes listed in the deed of obligation will be implemented. Discussions are ongoing on this matter.

TT.2.28	SZC Co. is to include an updated ES transport assessment within the Fourth ES Addendum to be submitted at Deadline 7 (Doc Ref. 6.18). This will address the comments raised by SCC on the ES as well as seek to address the comments raised by the ExA on the ES transport assessment.	The Council notes submission of the document and has responded separately in our Response to [REP7-030]. SCC assumes that Schedule 22 Certified Documents will be amended so it is clear which parts of the ES and associated addendums are certified. The authority's preference would be to have a single consolidated document but recognises the gargantuan task this would be.
TT.2.29	**Outage Car Parking – Transport Assessment** The Consolidated Transport Assessment [REP4-005] seeks to assess a core scenario for the Sizewell C Project for different stages of the project. The assessment includes a reasonable level of robustness but, in accordance with WebTAG guidance, does not seek to create a 'universal worst-case scenario that takes into account all risks' (TAG Unit M1). The Consolidated Transport Assessment [REP4-005] was scoped with Suffolk County Council as the local highway authority and an assessment of an unplanned outage with a planned outage was not required by SCC as part of the core assessment scenario. Notwithstanding this, there is a risk that a planned outage at Sizewell B could coincide with an unplanned outage at Sizewell C or vice versa and therefore separate outage car parks are proposed for each facility. Consideration has therefore been given in this response to the scale of traffic that that scenario would generate and whether it would result in new transport effects. A summary of this sensitivity assessment is provided below. A review of traffic flows across selected links close to the study area has been undertaken in the 2034 Operational phase to establish whether there would be any links with a substantially higher flow than has already been assessed in any hour, in either the 2034 Operational or the 2028 Peak Construction phase. Beyond this local study area the assessed 2028 Peak Construction traffic flows would be higher than traffic flows generated by a double outage. The 'Sizewell B outage' traffic flows on each link (which were already included in the Reference Case scenarios)	Whilst the Council agrees that the assessment method appears to show limited changes, it does need to be borne in mind that the assessment applies a 'maximum flow in any of the seven modelled hours', which is assumed to mean the 'total traffic flow' (i.e. background + SZC + outages), would be occurring at different hours, and that while the total traffic flows might be comparable to what has already been assessed, the proportional impact of Sizewell C might be noticeably different. The impacts of Sizewell C are reduced by the modelling of shift patterns, these shift patterns become far more 'typical' during the Operational phase meaning that the impacts are felt more around the peak hours. SCC notes that the decision to agree to include a single outage in the transport assessment was a result of discussion with the Applicant during scoping regarding the likelihood of outages overlapping. At that stage the Applicant did not provide the level of detail now being presented to justify the size of the outage car park. At that time SCC accepted the applicants view that overlapping outages was likely to be a rare occurrence.

	have been manually added again to the total 2034 Operational phase traffic flows, to represent two outages occurring. A manual adjustment has been made to account for the fact that the Sizewell C outage car park would be accessed via the MDS roundabout on the B1122, rather than the Sizewell B access on Sizewell Gap. The assessment was undertaken for each link as follows: • The maximum flow in any of the seven modelled hours, in the 2034 Operational 'double-outage' scenario, was calculated. • This was compared against the maximum flow in any of the seven modelled hours in either the 2034 Operational or 2028 Peak Construction scenarios. • The difference between these two maximum flows on each link is presented graphically on the network diagram below (blue numbers are negative representing a decrease from what has already been assessed and red are positive representing an increase from what has already been assessed). This demonstrates where traffic flows in the 2034 Operational phase, with a double-outage, could potentially be higher than any scenario already assessed within the DCO (red numbers within the diagram). • The diagram shows that there would be reductions in traffic on the B1122 and SLR compared to what has already been assessed. The diagram shows that around the local study area in Leiston the addition of an outage at Sizewell C as well as Sizewell B would not result in significantly higher traffic flows than has been assessed already as part of the DCO. The diagram shows the following increase in flows in the Leiston area compared to what has already been assessed: 5. - B1122 north of MDS roundabout +2 two-way veh/hr 6. - Abbey Road south of MDS roundabout +14 two-way veh/hr	

	7. - Abbey Road south of Lover's Lane +5 two-way veh/hr 8. - B1122 Aldeburgh Road +6 two-way veh/hr in Leiston, +13 two-way veh/hr at Aldringham and +31 two-way veh/hr between Aldringham and Aldeburgh 9. - B1069 in Leiston +11 two-way veh/hr, +41 two-way veh/hr north of Coldfair Green, +2 two-way veh/hr south of Coldfair Green 10. - A1094 at the junction with B1069 +2 to +4 two-way veh/hr The maximum increase in traffic generated by a double outage compared to the highest flows already assessed is +41 veh/hr north of Coldfair Green, which is less than 1 veh per minute increase.	

SCC RESPONSE TO [REP7-036] PLANNING STATEMENT APPENDIX 8.4K – SITE WATER SUPPLY STRATEGY

Ref	SZC Co statement in [REP7-036]	SCC Deadline 8 response
Phase 1 – Water Trucks	The Early Works construction phase is proposed to begin in December 2022. There is a brief period before this date where a small volume of water will be required for early site establishment and site surveys and trials, and therefore water supply by truck has been allow for from October 2022. This water would not be sourced within the local Blyth area which is resource-constrained. If NWL confirms that it can supply Sizewell C from Barsham WTWs, near Beccles, it may be sourced from there, although no decisions have been made and one or more other sources may be used. The desalination plant will be constructed and commissioned, ready to supply the site with water by the start of October 2023. To allow some contingency in supply methodology, Phase 1 is extended to January 2024, providing a 4 month overlap between Phases 1 and 2.	The potential for Barsham to be used was queried in our historic response to the Desalination Plant change consultation. It is recognised that paragraph 1.9.3 of ISH8 Post Hearing Submissions Responding to Actions Arising from ISH8 [REP7-071] shows a profile that does not exceed the Early Year caps and includes the movements associated with the desalination plant. However, SCC raised concerns regarding the potential for significant numbers of HGV movements from the north exceeding those figures previously assessed, particularly along the A145. Paragraph 1.54 and 2.24 of Appendix 7B of the consolidated TA [REP2-046] sets out that 5% of HGV movements have been assessed as using the A145 and 10% the A12 to the north of the A145 (i.e. the 15% to the north). Further confirmation is sought from the Applicant on this issue, and we understand this will be provided at Deadline 8. Table 1.1 and Table 1.2 of Appendix B of Appendix 2C Transport Environmental Assessment Addendum [REP7-032] identified the Early Years Change on Link 83 (A145) is a 16% (no. 5) increase in HDVs in the representative hour and an 18% (no. 52) in 24 hours. Assuming that that increased by a further 74 movements as set out at Table 3.1 of [REP7-036] this would potentially increase to a 43%

		increase, and this level of impact may be considered significant depending on the sensitivity of the receptor. Some consideration needs to be given as to the potential late delivery of the desalination plant; however, Appendix A highlights the profile for water required for the project indicating that there is a steep incline in required potable water in April 2024, approximately 6 months after the programmed delivery of the Desalination Plant, and on that basis presents a risk, albeit low, that this issue would occur. SCC considers this risk can be resolved with an appropriate control, specifically that construction of the cut off wall cannot commence until the desalination plant is operational. As stated in our ISH11 response as LHA we have concerns regarding road safety, particularly at the A12/A145 and the A145 / B1062 junctions.
3.2.3	The existing potable water network near the site is owned by Northumbrian Water Ltd (NWL). This draws upon the local Blyth Water Resource Zone (WRZ). NWL has confirmed that they are unable to supply any water to Sizewell C from this zone. There is some potential spare capacity in the WRZ at NWL's Barsham Water Treatment Works near Beccles which is located in their Northern / Central WRZ, from which water is proposed to be transferred to Sizewell via a 28km pipeline. This transfer will also require other water network enhancements, which NWL are currently investigating. The proposed transfer main would connect into the local Blyth distribution network at Saxmundham Water Tower, and at other locations subject to detailed design. These local connections have the potential to provide significant legacy	Consideration should be given at this stage to how impacts associated with the water main can be minimised in the delivery of the Sizewell Link Road and other infrastructure to avoid additional disruption on the local road network. As set out in SCC's Consultation response, consideration should be given to: • at an early stage, to a holistic approach to the construction activities associated with the water main to minimise disturbance on local communities i.e. whether elements of this work could be included as part of the SLR construction programme in order to minimise further disruption to the road at a later date, (notwithstanding SCC's position on the permanency

	benefit by increasing capacity and resilience of the distribution network.	of the road), which may occur as a result of the delivery of the water main. • to whether a cumulative assessment of the additional impact of delivery of the water main is required given the likelihood of its delivery during construction. This is likely to require additional construction workforce movements, freight movements and associated traffic management, with additional impacts on communities as a result.

SCC RESPONSE TO [REP7-030] AND [REP7-032] FOURTH ENVIRONMENTAL STATEMENT ADDENDUM AND APPENDICES

11. The Transport Chapter of the ES Assessment for the Applicant has been the subject of ongoing discussions prior to and during the examination. SCC welcomes the updated assessment and appreciates the Applicant's efforts in looking to address our concerns.

12. Following changes to the methodology reflected in the recently submitted Fourth ES Addendum [REP7-030] and [REP7-032] and a review of the associated assessments, the methodology has been found to be acceptable subject to agreeing the Implementation Plan, Monitoring and Management Plans. A small number of queries has been raised relating to impacts on a limited total of links, and further discussion and clarification regarding these specific impacts and the proposed mitigation strategy has been sought. We are hopeful of reaching agreement with the Applicant on this issue, which particularly relates to the determination of impacts being reduced from Moderate or Major Adverse to Minor adverse based on the contingency fund. Whilst the Council appreciates that the fund could be used to mitigate impacts at these locations, whether these impacts can be determined to be reduced by the presence of the fund, without any committed mitigation is debateable and needs to be considered.