

The Sizewell C Project, Ref. EN010012

Comments on any additional information/submissions received at D8/D9

Suffolk County Council Registration ID Number: 20026012

Deadline 10

12 October 2021


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Preamble

Given that this is the final Deadline, SCC has focussed its responses on issues which can and should be addressed at this late stage in the process. In particular, this is with regard to documents which have been first shared with SCC at D8, or have seen substantial changes. SCC has not attempted to respond to all areas of disagreement.

[REP8-078] SIZEWELL LINK ROAD OUTLINE LANDSCAPE AND ECOLOGY MANAGEMENT PLAN

Ref	SZC Co comments in [REP8-078]	SCC Deadline 10 response	Ref to other submissions
4.3.6	Planting/transplanting methods and design will need to be agreed with the highway authority but will be focussed on the key locations identified below. An image of a crossing point on the existing B1122, with tall vegetation is presented as below in Image 1	SCC notes that a clear space must be maintained above the carriageway to allow for passage of large vehicles.	
Image 2		Most bat hop overs are located at or near to points where public rights of way will cross the Sizewell Link Road, for example CP10 and C12. On no account should the vegetation associated with the hop overs, either as planted or when mature interfere with general forward visibility on the road and specifically that approaching these crossing points.	
4.3.10	A total of up to eight mitigation ponds would must be provided to provide new breeding habitats for great crested newts (Volume 3, Appendix 2.9.C of the ES Addendum [AS-209]), whilst a further six ponds are to must be created which will to function as an enhancement of the aquatic habitats within the site post development.	Can the applicant that these are separate to highway drainage lagoons	

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4.3.11	<p>Enhancement of existing watercourses within the extent of land which forms the permanent land take for the Sizewell link road will be undertaken (approximately 50m upstream and downstream of the proposed new culverts). In addition, enhancement measures will be incorporated within the three watercourse diversions (Middleton Drain, Pretty Road Drain watercourse diversion west to Pretty Road and Pretty Road Drain watercourse diversion east to Theberton watercourse) and and new wetland habitat, such as a scrape, incorporated into the Middleton Drain.</p>	<p>SCC understands that the order limits do not generally extend 50m either side of the new culverts.</p>	
Table 5.2: Ponds: P2	<p>Water levels to be topped up using non-chlorinated/untreated water as required to ensure depth of ca. 50% of planned maximum depth during the establishment period. December-January One per annum.</p>	<p>SCC notes that pond in the area is typically recharged by mid winter but dry out in late summer so question the benefit of this management measure</p>	

[REP8-115] SCC RESPONSE TO SZC CO. COMMENTS ON RESPONSES TO THE EXA'S SECOND WRITTEN QUESTIONS

Ref	SZC Co comments in [REP8-115]	SCC Deadline 10 response	Ref to other submissions
AQ.2.1	<p>SZC Co. commits to provision of at least 20% of car parking spaces with active electric vehicle charging, with a further 20% capacity for passive provision for the main development site. 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 capacity for up to 40% to be provided, with an initial 5% active electric vehicle charging provided on first occupation. The Construction Worker Travel Plan (CWTP) has been updated for Deadline 8 (Annex L of the draft Deed of Obligation; Doc Ref. 8.17 (G)) 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</p>	<p>SCC has accepted the overall strategy; however remain uncertain as to whether the 80% figure is the appropriate occupancy to initiate an increase in provision. However, as per our response to Annex L of [REP8-088], SCC are of the opinion that the implementation can be monitored by the TRG and the 80% figure can be amended if it is felt that this is resulting in electric vehicles exceeding the charging capacity.</p>	<p>NNB Generation Company (SZC) Limited Document Index Deadline 8 Submission - 8.17 Draft Deed of Obligation - Clean Version - Part 1 of 2 [REP8-088]</p>

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	<p>Co. to convert passive to active spaces. Based on discussions with SCC, a trigger of 80% utilisation of the active vehicle charging spaces is proposed for the conversion of further passive spaces to active, which is incorporated into the updated CWTP (Annex L of the draft Deed of Obligation; Doc Ref. 8.17 (G)).</p>		
<p>AL.2.0</p>	<p>There is no significant disagreement with SCC on these issues. At Deadline 7 SZC. Co provided comments on submissions from earlier deadlines and subsequent written submissions to ISH1/ISH6 – appendices [REP7-062] and, in particular, Appendix H. In Table 2.1 of that document SZC. Co set out its intention to update the Construction Traffic Management Plan [REP2-054] to incorporate the following:</p> <ul style="list-style-type: none"> • add monitoring of freight modal split – monitoring of materials delivery mode split between marine, rail and road to demonstrate the mode shares achieved. The 60% by rail and marine is over the whole construction phase but monitoring data will be provided to the TRG on an annual basis (electronic page 7). 	<p>As per our response to Annex K of [REP8-088], the Council understands that an aspiration to transport greater than 60% of freight materials by rail and marine has been included in 4.3.1 of the CTMP appended to the Deed of Obligation and considers this acceptable. SCC welcomes the inclusion of the monitoring of the freight modal split.</p> <p>SCC welcomes the inclusion of a quarterly average target and agrees that the review process is reasonable and addresses our concerns, and recognise the Project’s need to retain some flexibility.</p>	<p>NNB Generation Company (SZC) Limited Document Index Deadline 8 Submission - 8.17 Draft Deed of Obligation - Clean Version - Part 1 of 2 [REP8-088]</p>

	<p>Daily HGV average target: update section 4 to provide an HGV quarterly average target of 500 daily 2-way HGV movements to/from the MDS during the peak construction averaged over a quarter. It would be a target rather than a cap and not meeting the target would trigger a review by the TRG and a decision if any action is to be taken. It would allow a decision to be made by the TRG based on marine/rail/road split. A cap may be instigated by TRG if practical and if exceedance occurs regularly. These two measures in combination would meet SCC's requests to have mode share constantly monitored and reported to TRG and provide the opportunity for TRG to influence the mode share. For example, the ability to tighten peak construction HGV traffic caps if the quarterly average is regularly exceeded would drive a greater share of transport by rail or sea. SZC. Co considers it important to retain some flexibility, particularly over choices between marine and rail transport for the reasons explained in its Response to ExA commentary on the draft DCO and other documents [REP7-058] at electronic page 17 but is happy to work with other TRG</p>		
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	members to optimise sustainable transport.		
AR.2.0	<p>a) SCC is correct that the establishment of the England Coast Path and the accessible coastal margin is in the determination stage with the Secretary of State. The Rights of Way and Access Strategy refers to this at paragraph 1.2.3 [REP7-023].</p> <p>b) Further clarity on the location of Footpath 21 (PRoW E-363/021/0), the Suffolk Coast Path, the future England Coast Path and Sandlings Walk (which are proposed to follow the same route along the coast within the main development site and, hereafter, referred to as the Coast Path) in relation to the sea defences was provided by SZC Co. at ISH12, and is included in the Written Summary of SZC Co.'s Written Summaries of Oral Submissions made at ISH12: Community submitted at Deadline 8 (Doc. Ref. 9.101). In summary:</p> <ul style="list-style-type: none"> • SZC Co.'s proposed route east of the hard sea defence is proposed so that the landscaped hard sea 	See SCC Comments at AR.2.1 Below	

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	<p>defence will screen lower level buildings and structures within the power station, allowing people to enjoy the coastal landscape and minimise intrusion by the power station. This is similar to the existing Coast Path and coastal defence alongside Sizewell B. This design approach is described at paragraph 6.12.7 and illustrated on Figures 6.14 and 6.15 of the Design and Access Statement submitted at Deadline 5 [REP5-070].</p> <p>SZC Co. has undertaken work recently which has identified that, through the Coastal Process Management and Mitigation Plan (CPMMP [REP5-059]), the Coast Path will not be eroded during the lifetime of Sizewell C, and SCC's concerns can now be alleviated. SZC Co. has updated the CPMMP to confirm a commitment to retain the Coast Path at Deadline 8 (Doc. Ref. 6.14 2.15.A(B)). There is therefore no reason, based on SCC's concerns, that the Coast Path should not be on the alignment proposed by SZC Co.</p>		
AR.2.1	SZC Co. reiterates that Requirement 6A has been added to the draft DCO requiring	ROW & Access Strategy Rev 5.0 (Clean Version REP8-055)	

	<p>a Public Rights of Way Implementation Plan be submitted and approved by SCC before any new or diverted public right of way listed in Schedule 11 may be commenced. The PRoW implementation plans must be in general accordance with the Rights of Way Strategy. SZC Co. has been working closely with SCC on the drafting of the Rights of Way and Access Strategy and submitted an updated version at Deadline 7 responding to SCC's comments [REP7-023]. A further updated version is submitted at Deadline 8 (Doc Ref. 6.3 15I(D)).</p>	<p><u>New Text Introduced by SZC Co Relating to DCO, Deed of Obligation and Code of Construction Practice</u></p> <p>SZC Co has introduced a significant amount of preamble to the strategy, between 1.1.4 and 1.1.10, which they say have been driven through on request from PINS to ensure that all documents are secured and legally enforceable, where appropriate. Clarification of the content has been discussed between SCC and SZC Co lawyers.</p> <p><u>Other Matters</u></p> <ol style="list-style-type: none"> 1. Throughout the strategy, the title “Rights of Way and Access Plans” is used, but the title of Rev. 7.0 of the plans is “Access and Rights of Way Plans”, 2. There are two 1.2.1.s in the strategy, 3. P.3 and 4 (second) 1.2.1 bullet point 1 – SCC seeks the deletion of the words “north-south” as it underplays the importance of east-west links, especially the Sandlings Walk, and is not reflective of concessions made by SZC Co on that route. SCC raised this in its Deadline 8 response, 	
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		<p>4. P.6 3.2.1 – this is a significant change in the way the alignment of FP21 in relation to how the coastal defence will be approved. The strategy states the exact alignment of PRow E-363/021/0 and the coast path will accord with the layout and scale details of the hard coastal defence feature, and these details must be submitted to and approved by East Suffolk Council, in consultation with Suffolk County Council. SCC suggests it might be helpful if the strategy made clear it is the hard coastal defence feature only which has to be approved by East Suffolk Council and not the alignment of FP21 and the coast path. The detailed alignment of FP21 is to be approved by SCC at a later date, and the detail for this should be captured in the Public Rights of Way Implementation Plans,</p> <p>5. P.7 3.2.3 – SCC acknowledges the final alignment of FP21 will not be agreed until a later stage and when detailed designs are being developed. The county council has made clear on previous occasions its preference for FP21 to be located on top of the HCDF, but has accepted this will need further</p>	
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		<p>consideration at the detailed design stage,</p> <p>6. P.9 3.2.12 – The term PRoW has been deleted and should be reinstated – see also comment below under P.14 4.5.1,</p> <p>7. P.14 4.5.1 – this section is headed “Coast Path”, and at 4.5.1 references to PRoW E-363/021/0 (FP21) have been deleted, in favour of the term the “Coast Path”. The section also refers to the England Coast Path.</p> <p>a. SCC requests the restoration of PRoW E-363/021/0 (FP21) to 4.5.1 and points out the distinction between:</p> <p>b. FP21, which is a PRoW for which the county council is highway authority, and which is the county council’s primary interest,</p> <p>c. The England Coast Path, which is a trail established by Natural England, which the county council will assume a maintenance and promotion role (with Natural England retaining certain functions, eg realigning the trail),</p>	
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		<ul style="list-style-type: none"> d. The 'coast path', which is a generic term and might refer to FP21, the England Coast Path or any other route along the coast, e. This representation also covers other references to coast path in the strategy, eg 3.2.12, f. In its response at Deadline 8 at AR.2.0, SZC Co state the company "has undertaken work recently which has identified that, through the Coastal Process Management and Mitigation Plan (CPMMP [REP5-059]), the Coast Path will not be eroded during the lifetime of Sizewell C, and SCC's concerns can now be alleviated. SZC Co. has updated the CPMMP to confirm a commitment to retain the Coast Path at Deadline 8 (Doc. Ref. 6.14 2.15.A(B)). There is therefore no reason, based on SCC's concerns, that the Coast Path should not be on the alignment proposed by SZC Co." 	
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		<p>g. REP5-059 refers to the Coastal Processes <i>Monitoring and Mitigation Plan</i>. SCC would welcome further information from SZC Co on what work was undertaken that demonstrated FP21 and the coast path will not be eroded during the lifetime of Sizewell C. Note also point 5. above,</p> <p>Additional Notes:</p> <p>8. As at 6th and 7th October 2021, the DCO Schedules and accompanying Access & Rights of Way Plans were still under discussion between SZC Co and SCC in respect of the detail needed to enable the county council as surveying authority to modify the definitive map and statement. SZC Co will be updating the ROW & Access Strategy to reflect the plans SCC should refer to for the detail of PRow alignment and width. <u>SCC will require clarity on status and alignment for all PRow changes requiring the definitive map and statement to be modified, and clarity on which plans can be relied upon as the</u></p>	
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		<u>legal event to do so under the Wildlife and Countryside Act 1981.</u>	
CA.2.14	SCC has indicated in recent discussions that in principle they are close to being content with relying on article 21. SZC Co. believes that provided they can agree with SZC Co the level of fees payable under the Deed of obligation for highway design and supervision fees, they will be content to drop their request for protective provisions in the DCO.	Agreement has been reached in the Deed of Obligation regarding the payment of fees.	
Cu.2.0	Please see SZC Co.'s Deadline 8 response to ExQ2 TT.2.28 for a summary of the position.	Noted.	
Cu.2.1	Further engagement has been undertaken with the relevant Parish Councils, SCC and ESC in order to confirm the agreed the proposed scheme of local improvements. The updated Deed of Obligation (Doc ref. 8.17(G)) provides the detail of the proposed schemes to be delivered.	SCC notes that continued engagement with the relevant Parish Councils will be necessary between the close of the examination and commencement and that stakeholders (SZC CO, ESC, SCC) have committed to this.	
NV.2.2	SZC Co. notes that any figures it quotes for anticipated noise reductions from quiet road surfaces are based on the values provided in the Design Manual for Roads and Bridges LA111 and they represent the Government-endorsed approach to the	Within the Statement of Common Ground to be submitted at D10 SCC has accepted that the use of lower noise surfacing on existing roads with low speed limits (ie Yoxford and Theberton) will have limited benefit in reducing traffic noise. However, its use at Marlesford and Little	

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	<p>assessment of such surfaces. The extent to which the acoustic performance of the road surface might change over time is not taken into account in any submissions on quiet road surfaces.</p>	<p>Glemham is still considered a benefit due to the likelihood of higher speeds, longer duration of impact and associated benefits with regard to vibration.</p> <p>SCC's position regarding lower noise surfacing on new roads remains as [REP7-162].</p>	
<p>TT.2.7</p>	<p>SZC Co. has continued discussions with SCC in relation to monitoring and controls and significant progress has been made in reaching agreement on these measures. A note was prepared by SZC Co. at Deadline 7 (Appendix H of Comments at Deadline 7 on Submissions from Earlier Deadlines and Subsequent Written Submissions to ISH1-ISH6 [REP7-060]) to summarise the proposed changes to the Construction Traffic Management Plan [REP2-054], Construction Worker Travel Plan [REP2-055] and Traffic Incident Management Plan [REP2-053] which had been submitted at Deadline 2.</p> <p>An updated CTMP (Annex K of the DoO Doc Ref. 8.17(G)) issued at Deadline 8, includes shoulder peak hour HDV/HGV targets for 07:00-08:00 and 16:00-17:00. Monitoring of the peak hour HDV/HGV caps and shoulder peak hour HDV/HGV targets is proposed to be via the DMS</p>	<p>SCC agrees that significant progress has been made and has been made since. SCC have provided the Applicant with our suggested changes to the versions of the Management Plans submitted as ANNEX K, L and M of the Draft Deed of Obligation at Deadline 8 [REP8-088]. SCC understand these changes will be incorporated into the final versions, and consider the documents are acceptable on the continued basis that the TRG are able to amend them.</p> <p>SCC welcomes the inclusion of the adjacent peak hour monitoring as per discussions with the Applicant.</p> <p>SCC welcomes the inclusion of the monitoring of the associated development site HGV movements.</p> <p>SCC agrees that the proposed daily notification will allow for early identification of issues.</p>	

	<p>through a GPS geofence around Theberton and Middleton Moor on the B1122 in the early years, and around the Sizewell link road in the peak construction.</p> <p>The updated CTMP (Annex K of the DoO Doc Ref. 8.17(G)) issued at Deadline 8 includes monitoring of HGV movements to/from the associated development site during their construction via the DMS, which will be reported to the TRG.</p> <p>The focus of the TRG should be on risk of non-compliance of the transport management plans as well as any non-compliance. SZC Co. must monitor the DMS on a daily basis against the requirements of the CTMP (Annex K of the DoO Doc Ref. 8.17(G)) and the TRG will be notified of any breaches of HGV caps or routes within 24 hours of them occurring. By undertaking this monitoring on a daily basis, any issues will be identified at an early stage and dealt with promptly.</p> <p>In addition, a summary of the DMS data will be emailed to the TRG members on a weekly basis throughout the construction period. This will not include the same level</p>	<p>SCC welcomes the commitment to the summary document.</p> <p>SCC agrees that exceedance of targets would trigger a review by the TRG only with associate remedial actions if appropriate.</p>	
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	<p>of detail as the monitoring reports but will provide an overview of compliance with the commitments set out in the CTMP. This will enable the TRG to understand if there is likely to be a risk of non-compliance of the controls and targets in the CTMP (Annex K of the DoO Doc Ref. 8.17(G)).</p> <p>Unlike for the caps, exceedance of targets would not be a breach of the CTMP (Annex K of the DoO Doc Ref. 8.17(G)) but would trigger a review by the TRG to determine if any remedial action is required.</p>		
TT.2.10	Please refer to the answer provided to ExQ3. TT.3.0.	Noted.	
TT.2.28	<p>As indicated in SZC Co. and SCC responses to this question at Deadline 7, SZC Co. has now prepared an updated assessment of the ES transport effects. The updated assessment was submitted to PINS at Deadline 7 as Appendix 2.C of the Fourth Environmental Statement Addendum [REP7-032]. The updated assessment addresses comments raised by SCC, as well as comments raised previously by the ExA. SCC's response to Cu.2.0 submitted at Deadline 7 states that SCC are still to complete their review of the updated ES assessment of transport</p>	<p>SCC has discussed our final concerns regarding the outcomes of the ES with the Applicant, and whilst we do not necessarily agree that an impact should be reduced by the presence of the contingency fund, given that it may not be used to mitigate the impact and that these are impacts that have been identified, are of the opinion that the mitigation strategy and overall conclusions are reasonable.</p> <p>As part of discussion, the Applicant has proposed to provide clarification on the dismissal of certain impacts, and the use of professional judgement, and this would address</p>	

	<p>effects, but ‘do not currently expect any areas of disagreement’. The updated transport effects tables were 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(G)) submitted at Deadline 8.</p>	<p>our final concerns around a small number of links.</p> <p>The dDCO Schedule 22 (REP8-036) needs to be updated to clearly show all relevant documents relating to the ES. The current position is that the schedule only refers to revision 1 of the Environmental Statement, the original submission, excluding addendums submitted during the examination</p>	
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[REP8-116] SZC CO. RESPONSES TO EXA’S THIRD WRITTEN QUESTIONS VOLUME 1

Ref	SZC Co comments in [REP8-116]	SCC Deadline 10 response	Ref to other submissions
TT.3.0	<p>SZC Co. has set out in detail the appraisal process that has been undertaken on route options, including Route W, within the “Sizewell Link Road Option Development and Summary Work Undertaken Post-Submission of the DCO”. This document forms Appendix 11 of the Sizewell Link Road Response Paper that was submitted at Deadline 2 [REP2-108] (electronic pages 341-504).</p> <p>The above document provides a review of the environment, economic, and community criteria that were considered in the Sizewell link road route selection. This includes consideration of whether the</p>	<p>SCC has approached issues around the routeing and permanency of the SLR consistently throughout the examination including in our Written Representation [REP2-189] and in our Response to CA.2.10 T.2.11, T.2.12, TT.2.15 at [REP8-179] and maintain our position on this issue. Namely that:</p> <p>Our position remains the same that the environmental and cost implications of the retention of the SLR outweigh the benefits once the construction phase of SZC is completed and the lack of utility</p>	

	<p>route option 'is likely to increase transport impacts on the wider network' [REP2-108] (electronic page 466). Against this criteria, SZC Co. does acknowledge that Route W is 'best placed of the options considered to intercept the Sizewell C HGVs from the south'. However, as noted above, the route selection considered a number of criteria, and overall, the Sizewell link road (i.e. Route Z) is the most appropriate route. In fact, for reasons set out in [REP2-108] it is the only appropriate route. These considerations are set out in Appendix 5D Sizewell Link Road: Principle and Route Selection Paper to SZC Co.'s responses to ExQ1 [REP2-108] (electronic pages 244 – 267) and were elaborated at the CA hearing on 17 August [REP7-064] (electronic pages 5- 7) and have also been set out in the written submissions following that hearing [REP7-066] (electronic pages 3 – 7) and are set out in response to Question CA.2.10 [REP7-056] (electronic page 139).</p> <p>As set out in the Sizewell Link Road Response Paper (electronic page 251) a peer review of the assessment work undertaken by SZC Co. was commissioned in 2019 to assess the identified options for the Sizewell link road. One of the criteria of the peer review was 'Minimising Route Mileage'. As set out in response to ExQ2 TT.2.10 [REP7-056] (electronic page 334), SZC Co. acknowledges that the vehicle km results for Route W and Z should have been transposed, and that Route Z (the Sizewell link road) would result in more mileage</p>	<p>of the SLR in the Operational Phase, especially when compared with the alternative route.</p>	
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	<p>than Route W. However, this difference in mileage is marginal, especially when considered as a percentage of the whole journey distance from the source of the journey.</p> <p>SZC Co.'s response to ExQ2 TT.2.12 [REP7-056] (electronic page 336) states that, when considering the whole journey of Sizewell C cars and LGVs across the study area, the difference in Veh-KMs between the two route alignments (Sizewell link road and Route W North), is in the region of 1-2% (i.e. marginally more Veh-KMs with Sizewell link road than Route W North alignment).</p> <p>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, there are a number of considerations, and not just transport related, that have been weighed up in selecting the route for the Sizewell link road.</p>		
<p>TT.3.5</p>	<p>(i) Based on the Implementation Plan there is expected to be a short period (circa 1 quarter) when the park and ride facilities are expected to be operational before the Sizewell link road is available for use. It is only during this one quarter that the CWTP would move from 'early years' to 'peak construction (i.e. once either of the park and ride facilities is operational) but the CTMP would still be operating under the early years controls (i.e. prior</p>	<p>SCC recognises the timings set out within the Implementation Plan, and have looked to give the TRG the relevant monitoring and resilience needed to respond to issues.</p> <p>SCC has agreed monitoring and management processes through the CTMP and CWTP.</p>	

	<p>to the Sizewell link road and two village bypass being available for use). Once the Sizewell link road is operational both the CWTP and CTMP would operate under the 'peak construction' commitments, targets and controls.</p> <p>Therefore, this question relates to the one quarter of time when the CWTP would be being monitored against the peak construction targets, which includes park and ride buses, but the construction workers would need to utilise the B1122. SZC Co. understands that the ExA is concerned that the traffic levels under this scenario have not been assessed as part of the Early Years assessment.</p> <p>First of all consideration needs to be given to the difference in mode share that would result from the change in transport strategy during this quarter. The workforce included in the Early Years assessment was 1,500 workers travelling to/from the main development site. At the time that the Sizewell link road is forecast to be available for use the workforce is expected to increase to circa 2,000 workers. The LEEIE park and ride facility would not be available and instead the workers would utilise the northern/southern park and ride facility. The campus would not be available at this time and therefore the peak construction mode share target would not be achievable from Day 1 of moving from Early Years to peak construction mode share targets.</p>	<p>The TRG will be provided with sufficient information to have early warning of potential issues and to identify measures to respond; most notably through management measures. The initial period after delivery of a park and ride will need to be managed effectively to minimise any additional potential significant impacts, and SCC is of the opinion that the proposed data and monitoring is able to achieve this.</p> <p>However, even with these processes in place there remains some potential for some exceedances, particularly associated with construction workforce movements, as a result of unforeseen impacts, however SCC has looked to minimise the likelihood of this and significance of the potential impacts should it occur.</p>	
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	<p>During the early years there is a commitment to achieve the mode share targets set out in Table 3.1 of the CWTP (Annex L of the DoO Doc Ref. 8.17(G)). Once either the northern or southern park and ride facilities are operational the target will be to achieve the peak construction mode share set out in Table 3.1 of the CWTP (Annex L of the DoO Doc Ref. 8.17(G)), which is based on the assessed mode share for the peak of the peak construction period, which will not occur for a number of years post delivery of the northern/southern park and ride facilities. It is standard practice in Travel Planning for final targets to be set, which are sought to be achieved by a particular point in time and interim targets set to ensure that this happens. The CWTP (Annex L of the DoO Doc Ref. 8.17(G)) has been updated to state that the TRG will be able to set interim mode share targets to ensure that the peak construction target is met. The interim peak construction targets would need to take account of when the campus will be available as that will have an impact on the level of walk and cycling that would be achievable.</p> <p>Based on this, on Day 1 of moving from the early years to the peak construction mode share targets set out in Table 3.1 of the CWTP, the 28% walk/cycle target would not be achievable prior to the accommodation campus being available (albeit other walk and cycle measures and infrastructure improvements are secured in the CWTP and Deed</p>		
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of Obligation, which would allow there to be proportion of walking and cycling). Therefore, if the non-walk/cycle peak construction mode shares were adjusted on a pro-rata basis excluding the 28% walk/cycle target, the mode shares would be similar to those applied in the early years, as shown below

Mode	Early years Split	Early Years Mode	Peak Split	Peak Mode	Pro-rata Mode
Walk/Cycle	0	0%	2,400	28%	0%
Car driver	242	16%	1,049	12%	17%
Car Passenger	58	4%	437	5%	7%
Direct Bus	600	40%	1,942	23%	32%
Park and Ride Bus	600	40%	2,654	31%	44%
	1,500		8,480		

Factoring the higher level of 2,000 workers to the pro-rata peak construction mode share targets (excluding walk/cycle) would yield the following:

Final Mode	Early Years Split	Pro-rata mode share	Higher Early Years Split
Walk/Cycle	0	0%	0
Car driver	242	17%	345

Car Passenger	58	7%	144
Direct Bus	600	32%	639
Park and Ride Bus	600	44%	872
	1,500		2,000

Compared with the early years assessment that has been undertaken, there could be around 100 more cars driving directly to the main development site per day (each way), many of which would travel on the B1122. There would be around 270 more workers using park and ride; however, the LEEIE park and ride facility would cease to be used once the northern or southern park and ride site is open, so all of the workers forecast to use park and ride at this point would be intercepted at the northern or southern park and ride facility rather than travelling onwards to the LEEIE park and ride facility. The additional workers driving directly to the main development site would be more than offset by the reduction in workers travelling through to the LEEIE park and ride facility; there would however be additional park and ride buses travelling on the B1122 to and from the northern or southern park and ride site. The potential number of buses on the B1122 is discussed in point ExQ3 TT.3.6(ii).

Based on these calculations, it is not considered that the traffic movements for this short period would change the assessment presented in the

	<p>Consolidated Transport Assessment [REP4-005] and the air quality, noise and vibration and transport assessments presented in the ES [APP-159 to APP-582] and subsequent ES Addenda [AS-179 to AS-260, REP6- 017], and is not considered to trigger a need for additional mitigation on the B1122 beyond that proposed (see ExQ3 TT.3.8). Therefore in response to part (i), the modal split approach currently proposed would not comprise the early years assessments.</p> <p>(ii) The peaks of different types of Project-related traffic will not occur at the same point of the construction period on all roads. We have assessed an appropriate and robust 'early years' scenario for the assessment of traffic impacts during this phase, with the assumptions set out in Table 7.7 of the Consolidated Transport Assessment [REP4-005]. It is considered more appropriate to consider the early years, for monitoring and management of the Project's construction by the TRG, in two parts reflecting the differing profiles of HDVs and construction workers in relation to their associated mitigation. This would better enable the management of the different traffic types against their associated caps and triggers during the construction phase. Please also see the Applicant's response to ExQ2 TT.2.8 [REP7-056] where it was stated:</p>		
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	<p><i>“The distinction between the Early Years period and the 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.”</i></p>		
<p>TT.3.9</p>	<p>The commencement dates for the highway improvements including the tie-in points for the SLR, TVBP and Yoxford are currently constrained by site access dates and the subsequent site clearance, ecology and archaeology.</p> <p>SZC Co. accepts that Yoxford and Friday Street roundabouts should be delivered as early as possible and would, subject to advanced site access and planning, seek to prioritise the delivery of both the Yoxford and Friday Street roundabouts.</p> <p>SZC Co. considers that the other highway tie-in points are currently scheduled in a reasonable way that can be managed and delivered so as to maintain traffic safety and flows without undue impact to the highway users. Please also refer to response to CU.1.22.ii.</p>	<p>SCC welcomes the commitment to prioritise the delivery of the Yoxford and Friday Street roundabouts as early as possible.</p> <p>Whilst SCC recognises the constraints on delivery of certain works, SCC continues to aim for all tie-in works to be delivered as soon as possible and with as minimal impact on the highway network as possible.</p> <p>The longstop dates for the delivery of the TVB and SLR have been a matter of discussion between SZC Co and SCC. Agreement has been reached on this matter by way of inclusion of the</p>	

	<p>Response to ExA's Further Commentary on the DCO (Doc Ref. 9.98) also sets out that the Construction Method Statement has been updated at Deadline 8 to include longstop dates for the delivery of the SLR and TVBP.</p>	<p>following text in the Construction Management Strategy:</p> <p><i>“The Sizewell link road (Work No. 11), the two village bypass (Work No. 12) and the temporary Beach Landing Facility must be available for use either within six months of the commencement of Phase 3, or before the start of the Phase 3 Installation of the Reactor Building Liner, whichever is the sooner”</i></p>	
<p>TT.3.15</p>	<p>Table 8.1 of the Construction Traffic Management Plan [REP2-054] and Table 5.1 of the Construction Worker Travel Plan [REP2-055] describe the monitoring strategy proposed at Deadline 2. SZC Co. and SCC have continued discussions in relation to the transport management plans and have agreed changes to the monitoring strategy. Appendix H of Comments at Deadline 7 on Submissions from Earlier Deadlines and Subsequent Written Submissions to ISH1-ISH6 [REP7-060] submitted at Deadline 7, describes the proposed changes to the transport management plans. A revised CTMP, Annex K of the DoO (Doc Rev. 8.17(G)) and CWTP, Annex L of the DoO (Doc Ref. 8.17(G)) are being submitted at Deadline 8.</p> <p>The proposed monitoring of Sizewell C vehicle movements secured via the CTMP, Annex K of the DoO (Doc Rev. 8.17(G)) and CWTP, Annex L of the DoO (Doc Ref. 8.17(G)) is summarised as follows:</p>	<p>SCC welcomes the commitments to monitoring of freight traffic through the DMS and awareness of breaches within 24 hours of them occurring.</p> <p>SCC welcomes the commitment towards traffic counters at the car park accesses and the monitoring on a daily basis and the weekly summary which will allow early understanding of travel patterns and potential early warning of any issues.</p> <p>SCC has requested some minor changes or clarifications to the management plans, and we understand that they have been incorporated into the final version. See responses to [REP8-088] Annex K, Annex L and Annex M below.</p>	

	<ul style="list-style-type: none"> • All Sizewell C HGVs, AILs and LGVs will be monitored via the DMS, which will provide real time monitoring of freight traffic. • All Sizewell C buses will be on a fixed timetable and routes but in addition to this the buses will be GPS tracked to enable the profile of buses in and out of the park and ride facilities and main development site to be monitored as well as a swipe card system on the buses to monitor bus patronage. • All Sizewell C car parks will have a permanent Automatic Traffic Count (ATC) to monitor Sizewell C cars entering and departing the LEEIE park and ride and main development site car parks in the early years; and the main development site car park, campus car park and the northern and southern park and ride sites during peak construction. SZC Co. has agreed with SCC that an ATC is not required at the freight management facility, given the low car traffic flows expected at that access (i.e. primarily site operations staff). The ATCs are proposed to be recorded using permanent cameras installed at car park accesses. <p>Therefore, based on the above all Sizewell C traffic movements will be monitored on a daily basis.</p> <p>As set out in the CTMP, Annex K of the DoO (Doc Rev. 8.17(G)) and CWTP, Annex L of the DoO (Doc Ref. 8.17(G)), the TRG will be notified of any breaches of</p>		
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	<p>HGV caps or routes within 24 hours of them occurring. In addition, a summary of the monitoring data based on the DMS and ATC surveys will be emailed to the TRG members on a weekly basis throughout the construction period. This will enable the TRG to understand if there is likely to be a risk of non-compliance of the CTMP, Annex K of the DoO (Doc Ref. 8.17(G)) and CWTP, Annex L of the DoO (Doc Ref. 8.17(G)) and for any action to be taken if required. Based on the notification of breaches and weekly summary of DMS data any TRG member will be able to call an urgent TRG meeting to discuss the matters of concern and agree any action that must be taken by SZC Co.</p> <p>SZC Co. believes that the monitoring proposed in the management plans submitted at Deadline 8 is very comprehensive and responsive. It will enable the TRG to have early warning of any potential non-compliance as well as any instances of non-compliance as they occur.</p>		
<p>TT.3.16</p>	<p>SZC Co. anticipates that the TRG would operate in partnership with the shared objective of delivering nationally important infrastructure efficiently but sensitively. It should rarely be necessary to vote as the parties will have similar objectives.</p> <p>The CTMP, Annex K of the DoO (Doc Ref. 8.17(G)) and CWTP, Annex L of the DoO (Doc Ref. 8.17(G)) submitted at Deadline 8 include the following</p>	<p>It has been agreed with the Applicant that the process for management of the Transport Review Group (TRG) as set out in Schedule 16 of the Deed of Obligation will be through unanimous agreement rather than voting.</p>	

	<p>commitments with regard to TRG governance and voting.</p> <p><i>“All members of the TRG must participate in the TRG and perform the obligations of the governance group. Schedule 17 paragraph 2 of the DoO (Doc Ref. 8.17(G)) requires this of ESC, SCC and SZC Co. and the Deed of Covenants with National Highways and Suffolk Constabulary will also require this. If required from time to time, TRG representatives from SCC, ESC, National Highways and Suffolk Constabulary shall be able to nominate an alternative representative from their authority if they are unable to attend a TRG meeting. Should a TRG member abstain from a vote, SZC Co. must cancel or withdraw one of its votes so that the TRG can proceed as far as practical by consensus.”</i></p>		
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[REP8-088] DEED OF OBLIGATION ANNEX M ‘TRAFFIC INCIDENT MANAGEMENT PLAN’

Ref	SZC Co comments in [REP8-088]	SCC Deadline 10 response	Ref to other submissions
5.2	Planned Incidents and Scenarios	As set out in our Deadline 8 submission [REP8-179] responding to Appendix H of [REP7-062], SCC would like to see included a scenario of an outbound train missing the last departure time to identify any issues this would cause for the following days operations. It is understood that the Applicant is planning to discuss this issue separately with SCC. Any	Suffolk County Council Deadline 8 Submission - Comments on any additional information/submissions received by D7 [REP8-179]

SIZEWELL C PROJECT DEADLINE 10 - SUFFOLK COUNTY COUNCIL RESPONSE TO ADDITIONAL SUBMISSIONS FROM THE APPLICANT

		<p>updates may need to be reflected in future iterations of the TIMP as part of the TRG's remit.</p>	<p>NNB Generation Company (SZC) Limited Deadline 7 Submission - 9.73 Comments at Deadline 7 on Submissions from Earlier Deadlines and Subsequent Written Submissions to ISH1- ISH6 - Appendices Part 2 of 3 - Revision 1.0 [REP7-062]</p>
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